



**NATIONAL WATER AND ELECTRICITY COMPANY (NAWEC)**

**DRAFT**

**RESETTLEMENT ACTION PLAN (RAP) FOR GERMP PHASE III**

**30KV TRANSMISSION LINES WITH ASSOCIATED MV T-OFFS AND DISTRIBUTION NETWORKS FOR  
CENTRAL AND UPPER RIVER REGIONS**

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**MARCH 2024**

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**ABBREVIATIONS**

CRR	Central River Region
CRR-N	Central River Region-North
CRR-S	Central River Region-South
DOF	Department of Forestry
DPPH	Department of Physical Planning and Housing
ECD	Early Childhood Development
ECOREAP	Ecowas Regional Electricity Access Project
EIB	European Investment Bank
ESIA	Environmental and Social Impact Assessment
EU	European Union
GBOS	Gambia Bureau of Statistics
GERMP	Gambia Electricity Restoration and Modernization Project
GIS	Geographic Information System
GOTG	Government of The Gambia
GPS	Global Positioning System
GRC	Grievance Resolution Committee
IDA	International Development Association
LACA	Land Acquisition and Compensation Act
LV	Low Voltage
MV	Medium Voltage
NAWEC	National Water and Electricity Company
NBR	North Bank Region
NEA	National Environment Agency
NEMA	National Environment Management Act
NRA	National Roads Authority
OMVG	Organisation pour la Mise en Valeur du Fleuve Gambie (French acronym for Gambia River Basin Development Organization)
PDO	Project Development Objectives
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
SDF	Sustainable Development Focus
T&D	Transmission and Distribution
TAC	Technical Advisory Committee
WB	World Bank



WCR

West Coast Region

## DEFINITIONS OF TERMS USED IN THE REPORT

Unless the context dictates otherwise, the following terms shall have the following meanings:

**“Alkalo” pl. alkalolu:** The administrative head of the village usually from the founding family /clan of the village.

**“An Environmental and Social Impact Assessment (ESIA)”:** An environmental and social assessment instrument identifies and assesses major potential environmental and social impact of proposed sub projects; it evaluates alternatives and design appropriate mitigation, management, and monitoring measures. (*World Bank- Guidelines for Environmental and Social Impact Assessment (ESIA): Published: 9 Aug 2016*)

**“Bantaba”** means an open space in the village where people meet to discuss village matters.

**“Census”** means a field survey carried out to identify and determine the number of Project Affected Persons (PAPs) or Displaced Persons (DPs). The meaning of the word shall also embrace the criteria for eligibility for compensation, resettlement and other measures emanating from consultations with affected communities and the local seyfolu and *alkalolu*.

**“Compensation”** means payment in cash or in kind for an asset or a resource that is acquired or affected by a project at the time the asset needs to be replaced (*IFC, Handbook for Preparing a Resettlement Action Plan*)

**“Cut-off date”** means date of completion of the census and assets inventory of persons affected by the project. Persons occupying the project area after the cut-off date are not eligible for compensation and/or resettlement assistance. Similarly, fixed assets (such as built structures, crops, fruit trees, and wood lots) established after the date of completion of the assets inventory, or an alternative mutually agreed on date, will not be compensated (*IFC, Handbook for Preparing a Resettlement Action Plan*)

**“Displaced Persons”** mean persons who, for reasons due to involuntary acquisition of their land and other assets (or the use thereof) under the project, result in direct economic and/or social adverse impacts, regardless of whether or not the said Displaced Persons are physically relocated. These people will have their: standard of living adversely affected, whether or not the Displaced Person must move to another location; lose right, title, interest in any house, land (including premises, agricultural and grazing land) or any other fixed or movable assets acquired or possessed, lose access to productive assets or any means of livelihood.

**“District”** means an area demarcated under the Local Government Act 2002 and it is the administrative unit immediately below the Region.

**“District Authority”** means the district authority established under Section 132 of the Local Government Act 2002. The District Authority is responsible for managing the affairs of the district.

**“District Tribunal”** means subordinate court at district level that handles customary matters such as land under customary tenure.

**“Involuntary Displacement”** means the involuntary acquisition of land resulting in direct or indirect economic and social impacts caused by loss of benefits from use of such land; relocation or loss of shelter; loss of assets or access to assets; or loss of income sources or means of livelihood, whether or not the Displaced Persons have moved to another location or not.

**“Involuntary Land Acquisition”** is the repossession of land by government or other government agencies for compensation, for the purposes of a public project against the will of the landowner. The landowner may be left with the right to negotiate the amount of compensation proposed. This includes land or assets for which the owner enjoys uncontested legal rights including customary.

**“Land”** refers to agricultural and/or non-agricultural land and any structures thereon whether temporary or permanent and which may be required for the Project.

**“Land acquisition”** means the repossession of or alienation of land, buildings, or other assets thereon for purposes of the Project.

**“Local Authority”** includes the Council and the District Authority

**“Loumo”** means weekly market day

**“Market Value”** means the most probable selling price or the value most often sought by buyers and sellers.

**“Project-affected person”** means any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily. *(IFC, Handbook for Preparing a Resettlement Action Plan)*

**“Replacement cost”** means the rate of compensation for lost assets calculated at full replacement cost, that is, the market value of the assets plus transaction costs. For agricultural land: the market value of land of equal productive use or potential located in the vicinity of the affected land, plus the cost of preparation to levels similar to or better than those of the affected land, plus the cost of any registration and transfer taxes. *(IFC, Handbook for Preparing a Resettlement Action Plan)*

**“Resettlement assistance”** means support provided to people who are physically displaced by a project. Assistance may include transportation, food, shelter, and social services that are provided to affected people during their relocation. Assistance may also include cash allowances that compensate affected people for the inconvenience associated with resettlement and defray the expenses of a transition to a new locale, such as moving expenses and lost workdays. *(IFC, Handbook for Preparing a Resettlement Action Plan)*

**“Seyfo” pl. seyfolu** - the administrative head of a District.

## EXECUTIVE SUMMARY

This is the Resettlement Action Plan (RAP) prepared in the context of the Gambia Electricity Restoration and Modernization Project (GERMP) backbone Phase III focused on rural electrification, and it involves the communities that were not covered during GERMP Backbone Phases I and II, and the ECOREAP (ECOWAS Regional Electricity Access Project) initial phases of electricity infrastructure development carried out in other parts of the country.

The GERMP is a multi-donor-funded project that aims to increase NAWEC's generation capacity through renewable sources, and also to reinforce its transmission infrastructure in the Greater Banjul Area (GBA) as well as in the provinces. The Project is funded by the Government of The Gambia (GOTG), the International Development Association (IDA), the European Investment Bank (EIB), and European Union (EU).

The RAP is based specifically on 72 communities where it was determined that construction of the planned infrastructure will impact negatively on peoples' farmlands and fruit trees; 43 communities in Upper Fulladu West District in Central River Region – South and 17 in Sami District in CRR North; 12 villages in the Sandu District in Upper River Region-North).

### Rationale for the RAP

The RAP seeks to:

- i. Avoid or minimize, as much as possible, involuntary resettlement
- ii. Mitigate any adverse potential residual impacts
- iii. Ensure that the affected persons that must leave their living environment and / or lose part of their property or assets following implementation of the project:
  - Are compensated for these losses at integral replacement costs;
  - Are supported to restore their livelihoods;
  - Increase positive impacts of the Project for PAPs, including making sure they benefit from project activities.
- iv. Reduce the risks of poverty, exclusion, and inequitable access to benefits especially for the vulnerable and marginalized individuals and groups such as women, single-headed-households, elderly, children, etc.
- v. Ensure the Project is socially acceptable to maintain credibility of the implementing authority and funder.

### Legal framework

The main legal instruments that affect land administration in the Project area are the Lands (Regions) Act, (which has jurisdiction over all lands covered by the Project).

Other laws include:

- The Physical Planning and Development Control Act, 1991
- The Surveys Act 1991
- Local Government Act, 2002
- Land Use Regulations, 1995
- Lands Commission Act, 2007
- State Lands Regulations, 1995
- Development Control Regulations, 1995

- The Constitution of the Republic of The Gambia, 1997
- The Land Acquisition and Compensation Act, (LACA) 1991

With specific reference to compulsory land acquisition there is the Constitution of the Republic of the Gambia, 1997 which recognizes and upholds the principle of private ownership of lands and provides for compulsory acquisition of land and the conditions under which such acquisition can take place. These include, “the prompt payment of fair and adequate compensation, and aggrieved persons have a right of access to a court or other impartial and independent authority for redress.”

LACA provides further details on the compulsory land acquisition which include the provision that compensation must be based on replacement cost method, (Section 11).

The RAP is also guided by the World Bank and the European Investment Bank involuntary resettlement policies which prescribe the processes and procedures to be followed and the payment of fair and equitable compensation as well as the provision of support to PAPs, amongst other measures.

The national laws share many points in common with the Banks’ Policy guidelines; however, some areas of divergence exist. The payment of allowances for ‘disturbance’ and assistance to resettle PAPs is not provided for by Gambian law, nor are those who do not have a legal right (freehold, leasehold, or customary) to land considered for any form of compensation for lost property, assets, or earnings. National laws do not also provide for the establishment of a functional grievance mechanism to lodge complaints as well as a monitoring and evaluation system for the resettlement program. Therefore, the project must follow the OP. 4.12 and ESS6 for these areas of divergence.

### **Eligibility criteria**

In accordance with Banks’ policies, any person who will suffer loss or damage to a building, business, trade, or loss of access to productive resources, as a result of the Project will be considered eligible for compensation and/or resettlement assistance.

For this Project, the eligibility criteria include persons with formal legal rights to economic assets (including customary and traditional rights recognized under Gambian laws) as well as informal rights consistent with OP 4.12 and ESS6. OP 4.12 and ESS6 also recognize PAPs with informal rights to land, including squatters, renters, farm workers, etc. who have a right to support for their displacement. Also, informal economic activities have a right to resettlement support.

Proof of eligibility will include various forms of evidence including the following:

- PAPs with formal legal rights, documented in the form of certificates endorsed by the Alkalo or Area Council as required by law;
- Witness or evidence by recognized traditional authority, Seyfo, family heads and elders and the general community.

The cut-off date for being eligible for compensation and/or resettlement assistance was 29 December 2023, which was the last day during which the socio-economic survey was completed. Beyond this date, complaints by PAPs will be addressed through the Project’s Grievance Mechanism and will be reviewed by the Grievance Redress Committee (GRC) located at the Project Office.

## Public consultations and the Grievance Mechanism

During the development of the RAP, there were consultations with all relevant stakeholders-government agencies and beneficiary communities including PAPs, with special attention to disadvantaged and vulnerable groups (women, children and the disabled, etc.). The beneficiary communities were informed of the potential impacts of the project on their assets such as land, trees, and loss of earnings and about the compensation entitlements for the loss of these assets.

A grievance mechanism has also been included in the RAP to provide an effective avenue for project affected persons (PAPs) to express their concerns and resolve grievances caused by project activities in a fair, transparent, and easily accessible manner. During this RAP's development no grievances were received. However, during implementation any grievances or complaints will be addressed through the GRM.

## Census and socioeconomic situation

A total of **78** household heads were interviewed (73 males and 5 females), and **1,145** persons (617 males and 538 females) within these households will be affected by the Project. The main occupation within the communities is farming in which most of the household heads (89%) and 854 persons (52% of the other household members) are engaged. They rely almost exclusively on agriculture and livestock for their subsistence.

Agriculture in these communities is mainly subsistence rain-fed, producing food crops such as cereals (Early millet, late millet, maize, sorghum, rice, etc.). However, cash crops (mainly groundnuts), account for a greater portion of the production. The cultivation of horticultural crops (vegetables and fruits) is also practiced but mainly by women farmers growing tomatoes, okra, sorrel, etc. during the dry season.

Seventy-four persons were enumerated as vulnerable, and they included various forms of vulnerability such as by virtue of age; this group included men who are above 70 years, and women with 65 years or more. The reason for this is because men and women who are seventy and sixty-five years and above respectively in these communities are regarded as generally vulnerable in that they have passed their days when they are able to do laborious work to provide their daily needs from, for example farming activities, which is mostly the primary economic activity within these communities. Of this category, 54 persons (44 - 81.5%) men and 10 female-18.5%) were recorded. Another vulnerable group enumerated included five women household heads.

## RAP formulation and implementation schedule

The implementation of this RAP will be under the overall responsibility of NAWEC, and the Project Implementation Unit (PIU). The Ministry of Petroleum and Energy (MOPE), the parent ministry of NAWEC will provide policy oversight and support to NAWEC in the mobilization of the necessary funds to implement the RAP.

The PIU's Environmental Social and Safeguards Specialists (ESS), shall be responsible for the day-to-day management of the resettlement program. Other institutions such as the NEA, the Ministry of Lands and Regional Governments, (MOLRG), and its technical department will offer technical support where necessary. The RAP formulation and implementation schedule is presented in the Table below.

Activities/Tasks	Weeks											
	1	2	3	4	5	6	7	8	9	10	11	12
Cut-off-date	29 <sup>th</sup> December 2023											
Preparation of RAP												
Review and approval by WB												
Disclosure of RAP to PAPs												
Disclosure on Banks' Websites												
RAP implementation												
Internal Monitoring												
Independent Evaluation												

Implementation of the RAP is expected to take twelve weeks, from preparation through payment of compensations to the PAPs, to the monitoring and independent evaluation exercise. It is important to note that the RAP implementation must be completed, and the PAPs fully compensated before any civil work can commence. To facilitate this process, it is recommended that a consultant be recruited who will work closely with the PIU to implement the RAP and produce a RAP implementation report.

### Budget and funding arrangement

The estimated budget for the RAP's implementation, including compensation of PAPs, and its monitoring and evaluation is **D5,600,003.00** (five million six hundred and thousand two and three Dalasi) as indicated in Table below which is equivalent to **US\$ 83,961.40** (eighty-three thousand, nine hundred and sixty-one Dollars, and forty cents).

The funds will be provided from the resources of both the Government of The Gambia and the World Bank and EIB, and all payments to PAPs will comply with the relevant Gambian legislation and the Banks' requirements.

GOTG will contribute **D1,058,403.00** (one million and fifty-eight thousand four hundred and three Dalasi), equivalent to **US\$ 16,036.40** (sixteen thousand and thirty-six Dollars and forty Cents), and IDA/World Bank/EIB will contribute **D 4,541,600.00**, (four million five hundred and forty-one thousand, six hundred Dalasi) equivalent to **US\$ 67,925.00** (sixty-seven thousand, nine hundred and twenty-five Dollars).

The Banks' contribution will provide the remuneration for the Consultant to support the PIU in RAP implementation and to do a RAP audit after the completion of implementation.

### Budget for the implementation of the RAP

No	Activity/Item	Total (D)		Total US \$	
		Source of Funding			
		GOTG	IDA/EIB	GOTG	IDA/EIB
<b>A</b>	<b>COMPENSATION TO PAPs</b>				
1	Compensation for loss of farmland	624,185.00		9,457.34	
2	Compensation for trimmed trees	82,000.00		1,242.42	
3	Assistance to vulnerable groups	156,000.00		2,363.63	
	<b>Subtotal</b>	<b>862,185.00</b>		<b>13,063.40</b>	
<b>B</b>	<b>RAP IMPLEMENTATION</b>				
4	Consultant to support PIU in RAP implementation	0	2,503,100.00	0	37,925.00

5	Allowance to support personnel and logistics including meetings of GRC members	60,000.00	0	909.00	0
6	Internal monitoring and evaluation of RAP implementation by PIU	50,000.00	0	757.75	0
	RAP implementation audit		2,038,500.00		30,000
7	Contingency (10% of compensation cost)	86,218.00	0	1,306.33	0
<b>Subtotal</b>		<b>196,218.00</b>	<b>4,541,600.00</b>	<b>2,973.08</b>	<b>67,925.00</b>
<b>Subtotal</b>		<b>1,058,403.00</b>	<b>4,541,600.00</b>	<b>16,036.40</b>	<b>67,925.00</b>
<b>Grand total</b>		<b>5,600,003.00</b>		<b>83,961.40</b>	

1 US Dollar = D66.00

## CHAPTER 1: INTRODUCTION

### 1.1 Background and context

This is the Resettlement Action Plan (RAP) of Phase III of The Gambia Electricity Restoration and Modernization Project (GERMP) and involves the communities that were not covered during NAWEC's (National Water and Electricity Company) initial phases of electricity infrastructure development carried out in other parts of the country.

The RAP is based specifically on 72 communities where it was determined that construction of the planned infrastructure will impact negatively on peoples' farmlands and fruit trees; 43 communities in Upper Fulladu West District in Central River Region – South, and 17 in Sami District in CRR North; 12 villages in the Sandu District in Upper River Region-North.

The GERMP is a multi-donor-funded project that aims to increase NAWEC's generation capacity through renewable sources, and also to reinforce its transmission infrastructure in the Great Banjul Area (GBA) as well as in the provinces. The Project is funded by the Government of The Gambia (GOTG), the International Development Association (IDA), the European Investment Bank (EIB), and European Union (EU). It consists of the following three components:

1. **On-grid solar PV with storage:** This component comprises the development of a 20MW solar PV Plant in Jambur village in the GBA. The component will include battery back up to minimize grid absorption concerns.
2. **Transmission and distribution (T&D) restoration and modernization:** This component will include upgrades of the transmission and distribution network including a 225 kV line to:
  - i. Absorb the additional generation capacity
  - ii. Prepare for future capacity expansion including the OMVG and other pipeline projects and 30kV MV Backbone lines
  - iii. Reduce T&D losses
  - iv. Make future grid extensions possible. This component also includes activities such as emergency communications campaigns, LED bulbs to replace incandescent bulbs in government offices and replacement of streetlights as part of demand side management initiative, and urgent equipment rehabilitation.
3. **Urgent institutional support for sector turnaround:** This component involves institutional strengthening, capacity building and project implementation support related to improved operational performance of NAWEC.

### 1.2 Project development objective (PDO)

The development objective of the project is to improve the operational performance of NAWEC, and its capacity to dispatch variable renewable electricity. In this regard, the Project will improve the power generation capacity and efficiency of NAWEC's transmission network to increase access to electricity for the country's socio-economic development.

This objective is in line with the National Development Plan (NDP-2018-2021), The Gambia Electricity Sector Roadmap (2017) and the National Energy Policy (2014-2018), among other national policies which promote the extension, reliability, and quality of the Government's energy supply, as well as diversifying energy sources to include renewables.

### 1.3 Rationale of the Resettlement Action Plan

The *Environmental and Social Impact Assessment (ESIA) of the corridors through which the project will be implemented* identified potential impacts leading to involuntary resettlement, and loss of livelihood. Implementation of the Project can potentially lead to temporary, or permanent economic displacements with consequences on the affected persons in terms of loss of property, income, sources of income and access to natural resources that constitute their livelihoods. The project has been routed to avoid all physical displacement. Therefore, the following types of impacts include the involuntary taking of or restriction of access to land resulting to:

- i Loss of assets or access to assets
- ii Loss of income sources or means of livelihood, whether or not the affected persons must move to another location.

The ESIA also considered alternatives including choice of transmission line trajectories and various design options with the aim of identifying options with the least environmental and social impacts. Notwithstanding the efforts to avoid built-up areas, farmlands, forests, fruit trees and environmentally sensitive sites, some involuntary resettlement and loss of livelihood as a result of the Project is inevitable. Therefore, the ESIA recommended that a resettlement action plan be developed to mitigate such impacts.

According to The Gambia's Land Acquisition and Compensation Act (LACA), 1991, compensation should be given for involuntary resettlement although it does not legally require a RAP for such execution. However, since the Project is financed by the World Bank, the European Investment Bank (EIB), and European Union (EU) a RAP must be developed and implemented before any Project work or displacement of PAPs occurs in accordance with the World Bank's OP 4.12, and the EIB ESS6.

### 1.4 Objective of the Resettlement Action Plan

The objective of the RAP is to ensure that people negatively affected by the project are compensated for their losses, and their standard of living improved or at least restored to pre-project levels for sustenance of livelihoods. More specifically the RAP seeks to:

- i. Avoid or minimize, as much as possible, involuntary resettlement
- ii. Mitigate any adverse potential residual impacts
- iii. Ensure that the affected persons that must leave their living environment and / or lose part of their property or assets following implementation of the project:
  - Are compensated for these losses at integral replacement costs
  - Are supported to restore their livelihoods
  - Increase positive impacts of the Project for PAPs, including making sure they benefit from project activities.

- iv. Reduce the risks of poverty, exclusion, and inequitable access to benefits especially for the vulnerable and marginalized individuals and groups such as women, single-headed-households, the elderly, children, etc.
- v. Ensure the Project is socially acceptable to maintain credibility of the implementing authority and funder.

The RAP requires that due consultations be undertaken with all relevant stakeholders including PAPs before, during and after project implementation with special attention to disadvantaged groups (women, children and the disabled, etc.) within the community. In addition, the RAP should include a grievance resolution mechanism to address potential complaints and conflicts relating to the Project activities.

## 1.5 Approach and methodology in developing the RAP

### 1.5.1 Literature review

The literature reviewed consisted of national legislation, World Bank Operational Policies, European Investment Bank Environmental and Social Standards, and Project related documents relevant to involuntary resettlement.

The Land Acquisition and Compensation Act, 1991, provided the national provisions to consider during resettlement and compensation whilst the WB OP 4.12, and EIB ESS6 provides the funder's guidance for this study and implementation of the RAP.

The legislation and policies examined have also identified the legal scope of the resettlement process to ensure due consideration is given to the fundamental issues during the RAP development and implementation. Such issues include the need for community consultation, the need to ensure vulnerable groups are included, compensation for loss of livelihood and not only for involuntary resettlement resulting to physical displacement, notification, and disclosure.

The main Project document analyzed during the development of this RAP is the draft of the report entitled "**ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) FOR TWO 30 kV MV TRANSMISSION LINES WITH ASSOCIATED MV T-Offs AND DISTRIBUTION NETWORKS FOR CRR AND URR**" GM-NAWEC-339331-CS-CQS.

It provided the RAP study with the information necessary to identify the Project affected corridors. These included the:

- Physical scope of the Project in the regions and the list of proposed beneficiary villages (including their socio-economic baseline context); the corridors and specific project footprint were further refined during the RAP process in collaboration with the NAWEC engineer who designed the line routings
- Project components, materials and activities that will cause involuntary resettlement
- Alternative technology and design considered to prevent involuntary resettlement
- Institutional arrangements for the Project implementation.

In addition to the above, an extensive review was carried out on data from a variety of sources, including a selection of features derived from appropriate secondary spatial datasets collected by

different national sectoral institutions maintained in a GIS database. These were useful in the mapping of the project affected areas.

### **1.5.2 Field surveys**

Using the Project's draft ESIA report in which the identified communities with likely involuntary resettlement were highlighted, field visits were made to ascertain the conditions leading to involuntary resettlement; these included such as farmlands and livelihood activities, fruit trees, residential and commercial structures within the proposed line trajectories, etc.

In addition, the field survey consisted of a census and a socioeconomic survey to determine the number and to collect baseline data on the socioeconomic conditions of the PAPs. Overall, the census and survey provided information on:

- The number of potential PAPs to be compensated and their location
- The type of assets impacted and the nature of the impact
- Baseline data on the socioeconomic conditions of the PAPs
- The vulnerable persons among the PAPs and the nature of their vulnerability

The data collection in the field was supported by the use of Geographic Information Systems (GIS) in the analysis of supplementary primary data obtained from the field surveys. Specifically, to define the line routing and determine pole location on the farmlands, as well as to compensate the PAPs whose farmlands are impacted by poles, GIS was used.

### **1.5.3 Stakeholder consultations**

#### **1.5.3.1 Key stakeholder interviews and consultations**

Consultations and interviews with relevant Government agencies such as the National Environment Agency (NEA), National Roads Authority (NRA), Ministry of Lands and Regional Government (MOLRG), and Department of Forestry (DOF) were held, and will be further discussed in Chapter 3 (Public Consultations and Awareness Creation) below. The main aim of these consultations was to exchange views and consensus building about the way forward, including the definition of their respective potential roles and responsibilities in the development and implementation of the RAP.

For example, the MOLRG has legal mandate to provide land compensation should any PAP prefer land-for-land compensation, whilst DOF has mandate to manage forest resources in general, and specially has responsibilities under a Memorandum of Understanding between NAWEC and DOF which includes review of Project studies to prevent deforestation, develop and implement reforestation plans and monitoring, where applicable. The list of institutions and stakeholders consulted is provided in Appendix 3.5. List of attendees of the consultations is attached as Appendix 3.5.

#### **1.5.3.2 Community consultations**

Communities with potential involuntary resettlement as a result of the Project were visited, and small group meetings held with the village leaders, PAPs and other interested community members. The discussions were carried out using both structured and unstructured methods including public meetings and individual (one-to-one) meetings. Chapter 3 discusses the public consultations, and supporting documentation is annexed to the RAP.

The participants of the meetings were registered and informed about the Project benefits and activities, particularly those that may affect them negatively leading to loss of assets or loss of livelihood. Amongst others, these would include loss of land due to pole construction on farmlands; loss of economic trees due to trimming during line stringing.

The other reasons for the consultations with the communities included the need to inform the potential PAPs that a RAP is being prepared to assess the extent of impact that each PAP will suffer, and to carry out a valuation of all assets affected with a view to compensating them for all losses suffered.

Responding to questions regarding whether they can cultivate crops under the lines, the farmers were assured that there is no restriction to work under the lines after they have been constructed given that the main crops, they grow are groundnuts, millet, and sorghum which are not tall enough to obstruct the lines.

They were however advised to stay away during line construction for their safety. In addition, they were advised against cultivation of tree crops (such as mangos) under the lines as these grow tall and can obstruct the lines and thus become hazardous and unsafe for them. The discussions also considered the different forms of compensation and the Project Grievance Resolution Mechanism (GRM) in case of related conflicts or complaints.

#### **1.5.4 Socio-economic survey**

A socioeconomic survey of the PAPs was also conducted. In order to compensate the PAPs, it was necessary to collect socioeconomic data on the PAPs and their household members to:

- Identify the PAPs impacted by the project footprint and do a census of their households
- Provide their baseline socioeconomic conditions
- Confirm their losses (including temporary or permanent access restrictions)
- Assess the adaptability potential of the PAPs using data on occupation and education; this is especially true where the impact on the PAPs is of such magnitude that it affects their livelihood
- Identify and assess vulnerability of PAPs in relation to the project activities.

A structured questionnaire (Appendix 5.1) was developed to collect both qualitative and quantitative data on the PAPs and their household members. The questionnaire was simplified to cover only data that will be relevant and useful to the compensation process, to limit the interview time and avoid redundant data.

Telephone interviews were also carried out for some PAPs, whilst family members of absent PAPs were also allowed to respond on behalf of the PAPs, where the required details were known.

The collected socioeconomic data was then coded and entered for analysis using mainly Excel in a RAP database. Eventually, the compensation entitled to each PAP was computed using the analyzed data.

## CHAPTER 2: THE RELEVANT POLICY AND REGULATORY FRAMEWORK FOR INVOLUNTARY RESETTLEMENT

### 2.1 The national policy and legal framework

Tables 2.1 and 2.2 below indicate the relevant national policies and legal framework that will guide the development and implementation of this RAP.

**Table 2.1: Relevant national policy framework**

NATIONAL POLICIES			
Policy	Description	Relevance to the project	Focal institution
National Development Plan (NDP – 2023-2027)	Plan focuses on improving the policy and regulatory environment to attract investments into the energy sector	Provides framework for investments in the energy sector, such as the GERMP	MOFEA
Gambia Environment Action Plan, GEAP (2021-2030)	Integrated environment and natural resources management	Provides guidance in general environmental planning and natural resources management	NEA
National Energy Policy (2014 – 2018)	Policy aims to increase electricity coverage nationally	All electricity projects are implemented within the context of this Policy	MOPE/NAWEC
Forestry Policy (2023-2032)	Promotes state and community forests	Project infrastructure developed within forested areas and designated forest parks could degrade the forests	DOF
The National Biodiversity Strategy and Action Plan (NBSAP) (2015 – 2020)	Aims to increase biodiversity and protected areas	Project infrastructure developed within national wildlife parks could negatively impact Parks and wildlife	DPWM
National Transport Policy (2018–2027)	Defines the priorities and objectives of the road transport subsector, among other sectors	The types of roads around the project areas are usually defined and determined by the by this policy	NRA

**Table 2.2: Relevant national legal framework**

<b>RELEVANT NATIONAL LEGISLATION</b>			
<b>Legislation</b>	<b>Interpretation of legislation</b>	<b>Relevance to the Project</b>	<b>Enforcing institution</b>
State Lands Act, 1990 (Amended 2008)	Regulates land tenure and property rights	Potential involuntary resettlement for some Project activities	DLS
Land Acquisition & Compensation Act, 1991	Provides for consultation, resettlement, and compensation of land	Potential involuntary resettlement for some Project activities	MOLRG
Physical Planning and Development Control Act, 1991	Ensure developments in The Gambia are in line with land use planning and construction standards	The Project construction activities shall be in line with national landuse and planning rules	DPPH
National Environment Management Act, NEMA, 1994	Principal legislation for environmental management; Part V of provides for projects listed under Schedule A to be considered for ESIA	This Project falls under Schedule A requiring an ESIA/RAP	NEA
Development Control Regulations, 1995	These Regulations further prescribe the requirements for development control	All planning and construction phases of the Project should give consideration to these Regulations	DPPH
The Forest Act, 2018	Provides framework for the reservation and management of forests.	Designated forest parks could fall within the project's area of influence	DOF
Local Government Act, 2002	Act makes provisions for decentralized administrative structures including devolution of functions, powers, and duties of local authorities	The project falls under all administrative regions of the Country	MOLRG
The Gambia Roads and Technical Services Authority Act, 2003	Provides for the administration, control, and maintenance of all roads in The Gambia.  For the most part a defined right of way (ROW) is determined for the various categories of the national road network	Usually, NAWEC transmission lines are constructed along the road alignments defined by NRA.	NRA

## 2.2 World Bank's Involuntary Resettlement Policy OP 4.12

### 2.2.1 The World Bank Safeguard Policy OP 4.12

The Involuntary Resettlement Policy of the World Bank (OP 4.12) prescribes the processes and procedures to be followed where persons lose property, means of livelihood or where they experience a change in their standard of living as a result of the implementation of a Bank-financed project. Implementing the Project will result to direct economic and social impacts which will lead to the involuntary taking of land resulting in:

- i. Loss of assets or access to assets
- ii. Temporary loss of income, or means of livelihood, whether or not the affected persons must move to another location.

In view of the above, a Resettlement Action Plan (RAP) should be developed following the guidelines indicated below:

- i. That involuntary resettlement should be avoided, or minimized, as much as possible, by considering all feasible options including viable alternative project designs. However, if it is unavoidable, all persons affected by it should be compensated fully and fairly for lost assets
- ii. That involuntary resettlement should be seen and undertaken accordingly as an opportunity for improving the livelihoods of the affected people
- iii. That all persons affected by involuntary resettlement should be consulted and involved in resettlement planning to ensure that the mitigation of adverse effects as well as the benefits of resettlement are appropriate and sustainable.

There are two categories of resettlement plans (a full Resettlement Action Plan - RAP, and an Abbreviated Resettlement Action Plan- ARAP). A project is classified as requiring a full RAP when the number of persons to be displaced involuntarily is from 200 persons and above, and/or when the land-take is more than 10% of the total holding per person. However, where the number of persons to be displaced or affected is less than 200 persons, and the land-take is less than 10% of the total holding, OP 4.12 recommends an ARAP. Regarding this subproject, the total number of persons affected is 337 (head of households and household members) and hence the development of this RAP.

### 2.2.2 The European Investment Bank ESS 6

According to EIB's ESS 6, involuntary resettlement can have negative impacts on the economic and social well-being of affected persons; income sources can be irreparably lost, people can be relocated to environments where their skills may be less applicable, and monetary compensation may not be sufficient to prevent long-term hardship or disadvantage. The policy therefore provides standards and guidelines in implementing projects requiring land acquisition, expropriation and/or restrictions on land use, resulting in involuntary resettlement.

Firstly, it should be avoided as much as possible by exploring alternative project designs and locations. If it is unavoidable however, ESS 6 requires that the process should be undertaken with the full consultation and involvement, in the decision-making process, of all stakeholders, including the affected persons. In particular, the following objectives are desired, among others:

- i) Avoid or at least minimize, project-induced resettlement whenever feasible by exploring alternative project designs
- ii) Avoid and/or prevent forced evictions and provide effective remedy to minimize their negative impacts should prevention fail
- iii) Respect right to property of all affected persons and communities and mitigate any adverse impacts arising from their loss of assets, or access to assets and/or restrictions of land use, whether temporary or permanent, direct, or indirect, partial or in their totality
- iv) Assist all displaced persons to improve, or at least restore, their former livelihoods and living standards and adequately compensate for incurred losses, regardless of the character of existing land tenure arrangements or income-earning and subsistence strategies
- v) Pay attention to vulnerable groups, including women and minorities, who may require special assistance and whose participation should be vigilantly promoted.

### 2.2.3 Gap Analysis between Gambian laws and World Bank, and EIB policies

This section compares the requirements of Gambian legislation, specifically the LACA, 1991, and ESS 6 and OP 4.12 on compulsory land acquisition and compensation. Whilst there are gaps between the Gambian law and the lenders' policies, there are similarities in the following areas:

- i) It is generally accepted by the three policies that those losing land or property should be fully compensated before the works and that compensation should be assessed at replacement value
- ii) Notification of compulsory purchase is required, and redress is provided through the legal system for both policies.

There are, however, gaps between the three policies as indicated below, and some of the most important gaps are given in Table 2.1.

- i) Whilst OP 4.12 and ESS 6 aim to minimize severe long-term hardship, impoverishment, and environmental damage caused by involuntary resettlement, Gambian laws merely provide the environment for compulsory acquisition of land and subsequent payment of appropriate compensation.

There is no explicit requirement to minimize hardships; additional measures such as allowances for 'disturbance' and assistance to resettle PAPs are therefore not provided for by Gambian law.

- ii) The Banks' policies cover economic and social impacts resulting in relocation or loss of shelter, loss of assets or access to assets and loss of income sources or means of livelihood, Gambian law does not provide for additional measures to aid livelihood recovery, or to provide special assistance to vulnerable groups.

- iii) The LACA, 1991 provides for limited consultation procedures. Apart from a disclosure notice informing potential victims of Government’s intention of acquiring their property compulsorily for public purposes, the Act has no provision for public consultation and involvement in the acquisition process.

The Banks’ policies on the other hand, require public consultations to be made to ensure that all relevant stakeholders are given the opportunity for informed participation in resettlement planning with the goal that the mitigation of the adverse project impacts is appropriate, and the potential benefits of resettlement are sustainable.

- iv) The LACA, 1991 recognizes only those with legal title to the land to be acquired. Consequently, those without a legal (freehold, leasehold, or customary) right to land are not entitled to any compensation for lost property, assets, or earnings. These groups, who would therefore not qualify for compensation, include squatters whether residential or business and renters. The OP 4.12 and ESS6 recognize informal land tenure and note that these users should receive compensation and/or resettlement support.
- v) LACA, 1991 provides no legal requirement to prepare RAPs, or to undertake monitoring of the resettlement process unlike ESS 6 and OP 4.12.
- vi) Both the LACA, 1991 and the Banks’ policies provide redress through the legal system. In addition to this, however, the Banks’ further provide that the promoter shall set up and maintain a grievance mechanism that is independent and free.

Adherence to the above-mentioned policies of the lending Banks is a prerequisite for implementation of the Project; NAWEC must therefore fully respect and implement the provisions of the respective Bank policies, as well as the national legislation. Where they differ, the more stringent of the policies should prevail.

**Table 2.3 Comparative Analysis of LACA, 1991, EIB ESS 6 and OP 4.12**

Provision	Land Acquisition and Compensation Act	EIB ESS6 Involuntary Resettlement	OP 4.12	Gaps as addressed in this project
<b>Compensation</b>	1.Compensation required  2.Compensation to be assessed as replacement value	1.Compensation Required  2.Compensation to be assessed as replacement value	1.Compensation required  2. Compensation to be assessed as replacement value including all transaction costs	None
<b>Notification</b>	Required	Required	Required	None
<b>Redress</b>	Redress provided through the legal system	An independent and free grievance mechanism shall be set up and maintained	Redress provided first through the Project level complaint resolution mechanism and through the legal system	A Grievance Redress Committee (GRC) was set up to address complaints while

<b>Provision</b>	<b>Land Acquisition and Compensation Act</b>	<b>EIB ESS6 Involuntary Resettlement</b>	<b>OP 4.12</b>	<b>Gaps as addressed in this project</b>
				implementing this Project using the proposed GM. Complainants will also have recourse through the legal system.
<b>Consultation</b>	Provides for limited consultation procedures	Consultation with all relevant stakeholders must be made	Public consultation and involvement including disclosure and information on grievance redress procedures required	Extensive and inclusive consultations with women and vulnerable groups were held with the affected persons and communities, and will continue during RAP implementation
<b>Objective of Resettlement</b>	Merely provides for compulsory acquisition of land for public purpose and subsequent payment of compensation	Minimizes severe long-term hardship, impoverishment, and environmental damage	Minimizes severe long-term hardship, impoverishment, and environmental damage and must be treated as a development process	In addition to affected land, loss of livelihood was also considered for compensation, as well as considerations for reducing resettlement impacts on vulnerable groups.
<b>Coverage</b>	Does not provide for additional measures to aid livelihood recovery or for increased assistance to vulnerable groups	Covers economic and social impacts resulting in relocation or loss of shelter, loss of assets or access to assets and loss of income sources or means of livelihood	Covers economic and social impacts resulting in relocation or loss of shelter, loss of assets or access to assets and loss of income sources or means of livelihood	In addition to the relevant compensations considered for direct losses, support is provided to vulnerable groups
<b>Minimizing Resettlement</b>	No explicit requirement to minimize involuntary resettlement	Involuntary resettlement should be minimized as much as possible	Involuntary resettlement should be minimized as much as possible	In many instances where possible, corridors were re-routed to prevent

<b>Provision</b>	<b>Land Acquisition and Compensation Act</b>	<b>EIB ESS6 Involuntary Resettlement</b>	<b>OP 4.12</b>	<b>Gaps as addressed in this project</b>
				involuntary resettlement
<b>Eligibility</b>	Recognizes only those who have legal title	In addition to those who have legal title the Policy also recognizes squatters and vulnerable groups	In addition to those who have legal title the Policy also recognizes informal landowners and users including squatters and vulnerable groups. The types of compensation and support can vary according to the different types of land tenure	In addition to those with legal title, the Project also considered those whose livelihoods depend on the sites they do not own; and vulnerable groups such as children, women, the physically and mentally disabled, the elder etc.
<b>Cut-off Date</b>	The date that the MOLRG notifies potential PAPs of his approval for the acquisition of his property for public purposes	The date when PAPs' assets and infrastructure are recorded during the census survey	The date when the census of the people and acquisition of the inventory of their assets is completed	The date when the socio-economic survey and census was to be completed was published.
<b>Preparation of RAP</b>	No legal requirement to prepare RAP	RAP required	RAP required  Monitoring of resettlement process required	RAP prepared for this Project and included monitoring and evaluation of the RAP
<b>Livelihood restoration</b>	Not provided	Required	Required	Livelihood restoration plan will be prepared if livelihood is impacted, but it is not the case for this sub-project
<b>Monitoring of Resettlement Process</b>	Not provided	Required	Required	Monitoring and evaluation of RAP implementation will be carried out as indicated in Chapter 8

### 2.3 The institutional arrangement, roles, and responsibilities

The following institutions will have important roles to play in the implementation of the RAP:

#### a) Ministry of Petroleum and Energy (MOPE)

The parent Ministry for NAWEC will provide policy oversight and provide support to NAWEC for the mobilization of the necessary funds to implement the RAP.

#### b) NAWEC

The implementation of this RAP will be the overall responsibility of NAWEC, and more specifically, the NAWEC Project Implementation Unit (PIU). It shall be the responsibility of NAWEC to provide the necessary resources for the compensation payments as well as the implementation and monitoring of the RAP.

#### c) PIU

The PIU through the safeguards unit shall be responsible for the day-to-day management of the resettlement program which will include liaising with the PAPs, Government agencies and other service providers to ensure compensation and other forms of assistance are provided to PAPs in a timely manner. In this regard, it shall prepare monthly activity reports for the Project Steering Committee, the NAWEC management and the Bank. Through the social safeguard specialist and the gender / GBV specialist (who should also be involved in RAP implementation and especially support for vulnerable PAPs) the PIU will carry out the internal monitoring of the implementation of the RAP.

#### d) NEA

NEA, with support from the EIA Working Group will be responsible for overall external monitoring of the RAP implementation. NEA's mandate is to monitor the national environment, and so in collaboration with the PIU safeguard specialists, can also monitor compliance with the Banks' policies as they relate to this Project.

#### d) The Grievance Resolution Committee (GRC)

A Grievance Resolution Committee (GRC) has been created by the GERMP in the various Regions of the country and will play a crucial role in the RAP implementation process by addressing complaints and concerns raised resulting from the project activities.

#### e) Other national institutions

These include the MOLRG and DPPH, which may be required to offer mainly technical advice and/or regulatory information on land and resettlement related issues.

#### f) The local authorities (District Authority and District Tribunal)

These institutions will assist with RAP information dissemination, mobilizing communities for consultation, and where disputes about land ownership arise the traditional dispute resolution mechanism can be used. Where the traditional mechanism fails to resolve the complaint, the plaintiff can take the matter to the District Tribunal.

### 2.4 Capacity Building

Some of the institutions identified above such as the NEA and the Technical Advisory Committees (TACs) do not have adequate skill and capacity to implement the World Bank's social safeguard policies and would therefore need to be trained in that regard.

The PIU will facilitate technical support to NEA and the regional TACs to enhance their understanding of the World Bank's environmental and social safeguard instruments. Similar capacity building will be necessary for the Grievance Resolution Committees.

It is recommended that a consultant be recruited to support the PIU to implement this RAP; incidentally one of the two safeguard specialists has already been involved in RAP implementation before. This will help the PIU and the new specialists to further develop their capacity to manage the implementation of RAPs in future projects.

## CHAPTER 3: PUBLIC CONSULTATIONS AND AWARENESS CREATION

This Chapter presents the stakeholder consultation that was carried out between the 16<sup>th</sup> – 29<sup>th</sup> December 2023, and 13<sup>th</sup> March 2024. Please see Appendices 3.1 – 3.5 for summary of comments and views, registers of attendees at the meetings, lists of persons met, etc. Public consultations and participation are an integral part of the RAP preparation process because it creates awareness and provides an opportunity for the stakeholders to take a more active role in the process. It is through this process that stakeholders have the opportunity to influence and share control over development initiatives and the decisions and resources that affect them.

### 3.1 Objectives of the consultations

The consultations were aimed at achieving the following objectives:

- i. Discuss the Project with stakeholders, highlighting its components and the positive and negative impacts
- ii. Acquire key social and economic information, other social baseline information, and information on livelihood generating activities
- iii. Understand the social dynamics, relations, and the broader social and economic context of the stakeholders, and the possible impacts of this project
- iv. Collect views, questions, concerns, and expectations of the stakeholders on the sub-project and its land acquisition strategy, as well as validating the feedback with them
- v. Highlight the potential roles and responsibilities of all stakeholders during both RAP development and implementation.

### 3.2 Adopted approach

The approach adopted in this study was guided by the following principles:

- Free:** Engagement was free of external manipulation or coercion and intimidation
- Prior:** Engagement was undertaken in a timely way and prior to decisions being made so that views expressed can be taken into account
- Informed:** Relevant and understandable Project information was disclosed to help stakeholders to understand the risks, impacts and opportunities of the Project

### 3.3 Consultations with beneficiary communities

The Consultant adopted a full disclosure policy on all pertinent resettlement issues. Information disclosed included background information on the project; likely impacts and assets likely to be affected such as the land-take by the poles on the farmlands; trimming of tree branches to make way for the transmission lines; and possible disturbance and temporary loss of earnings during line construction.

Special emphasis was made on the size of land needed by the Project to set up the electric pole (approximately 2m x 2m = 4m<sup>2</sup>). To illustrate this point, the Consultant drew sketches of the approximate area for a pole in the sand for a better understanding of the PAPs of the size of the land

they would lose to the Project. This helped to allay their concerns on the potential land-loss, as well as manage their expectations on the amount of possible financial compensations.

**Figures 3.1 to 3.4** present consultation sessions in some of the communities in URR-North and in CRR-North and South.



**Figure 3.1: Consultations in the communities of Njiebe (27.12.23) and Mamadi Ceesay, URR-North (28.12.23)**



**Figure 3.2: Consultations in Sare Yero Gulory (20.12.23) and Nyameng Kunda (21.12.23) in U. Fuladu West, CRR South**



**Figure 3.3: Consultations in Fitu Fula (26.12.23) and Tabanani (26.12.23) in CRR-North**

The Consultants also informed the communities about the Project’s Grievance Resolution Mechanism (GRM) ensures that communities have a framework and platform to launch their complaints when they feel aggrieved, whether in the case of compensation payments or other matters.



**Figure 3.4: Consultation with PAPs in Nyankui, Sandu-URR-North (27.12.23)**

In their response, the beneficiary communities welcomed the news of electricity coming to their communities as they see it as an important aspect of development. In this regard, some of the community members even expressed their willingness to give the land required free since the arrival of electricity would bring a lot more benefits to them, and the size of land required, according to them, is very small.

On the voluntary donation of land, the Consultant replied that this was possible but that the process was lengthy. Therefore, the project has decided to compensate all PAPs financially for their land and there was no land donated as part of this sub-project.

**Appendix 3.1** presents the summary of the views and concerns expressed during the consultations. Meanwhile, some of the concerns raised by the communities include:

- How soon will the project start?
- How can they be connected?
- If financial compensation is to be paid, how will this be done?

In reply to these questions, the Consultant explained that the project is likely to start this year (2024) if the necessary procurement issues are finalized by the PIU. On the payment of financial compensation, the consultant replied that the PIU will travel to their communities to make the payments in due course. The PAPs will be informed before the compensation activities take place so that they are available to receive their compensation.

On the household connections, the communities were informed that once the lines are strung, NAWEC will arrange to send a team to each community to explain the condition of connecting households including costs, and to help them fill the necessary forms. In this respect because of their economic condition, NAWEC will charge any community member who wishes to connect to the grid 50% less than the normal national connection fees. This measure is not necessarily designed for only the persons on whose farmland poles will be erected, but indeed all the community members in villages where the line passes. Therefore, this clause is not included in the agreements between NAWEC and PAPs.

On cash compensation, the PAPs were informed that all compensation payments will be completed before NAWEC starts taking the land and putting up the poles. However, because of the size of the compensation amount, the Consultant recommended that payments be made in cash rather than by check, and that NAWEC should arrange to pay the PAPs in their communities instead of requiring them to travel outside their localities for which transport, and other costs may substantially reduce the amount of their compensation.

At every community visited, an attendance register was created of all persons that attended the consultations; Appendix 3.2 shows the completed attendance registers, and in Appendix 3.3 is the summary of the attendance registers. A total of 462 community members (352 men – 76% and 108 women – 24%) attended the consultations.

### 3.4 Consultations with government agencies

Consultations with central and local government institutions is critical to the success of the RAP process, and indeed for the entire GERMP project. Certain national institutions (such as the Ministry of Lands and Regional Governments (MOLRG), Offices of the Regional Governors, NEA, DOF, NRA, etc.) need to continually engage with the GERMP especially where their oversight regulatory functions on the Project are concerned. Engagement with these regulatory public authorities is often based on their respective institutional oversight and interest in activities related to the project. The summary of the minutes of the consultations, and list of institutions consulted are attached as Appendix 3.4 and Appendix 3.5 respectively.

A meeting was conducted with the Technical Advisory Committee (TAC)<sup>1</sup> in the Governor's office in CRR on the 15<sup>th</sup> of February 2024. TAC institutions usually have long-established relationships with affected communities and therefore can play important roles, for example, in convening and facilitating discussions between Projects and stakeholders. **Figure 3.5** shows the meeting of the Consultant with the CRR TAC chaired by the Deputy Governor, Mr. Sainey Mbye. Appendix 3.1 is the minute, and Appendix 3.6 is the list of attendees at the CRR TAC meeting.

The meeting with the TAC discussed issues related to RAPs and it enabled the definition of their strengths and weaknesses in relation to their potential roles and responsibilities in the implementation of the RAP, including their participation in the Grievance Resolution Mechanism.

During the discussion on the GRM, the TAC highlighted a case that happened in 2023 at Sami Tenda in CRR-North. According to them, a dispute broke out between a former female PAP (sells food in a make-shift canteen located along the line trajectory by the roadside) and NAWEC Project personnel. She was impacted by NAWEC's Ecogas Regional Electricity Access Project (ECOREAP) and was thus compensated for temporary "loss of daily earnings", i.e., she was refunded the three days' earnings (as prescribed in the RAP that was developed by this consultant) she was assessed to lose as a result of the pole construction and line stringing around her canteen during which time she was expected to close shop.

However, she was asked by the NAWEC contractor to relocate from her usual place of business permanently since she had been compensated in the ECOREAP RAP process. She refused to move, and the Deputy Governor - CRR was called in, but she still did not budge. Because she was compensated, the contractor and the government officials erroneously believed that she could not remain at the

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<sup>1</sup> The Technical Advisory Committee comprises the regional representatives of national institutions located at the offices of the Regional Governors. Different subcommittees of the TACs were created to address the different Government programs in the regions, and one of these is the EIA subcommittee comprising the different regional programs in agriculture, environment, and natural resources. Since the ESIA/RAP are interrelated this subcommittee oversees implementation of ESMPs and RAPs of national projects in to the Region.

site; they did not know that according to OP 4.12 she could go back to her place of business after the completion of the works, and that was why she refused to move because the works had since finished.

The TAC meeting was informed that the woman was right, and that the contractor and the NAWEC staff accompanying him had no right to remove her from her place of business. The Committee highlighted the need for more training and sensitization in RAP processes. These comments are reflected in Appendix 3.1



**Figure 3.5: Meeting of the CRR TAC with the Consultant (15<sup>th</sup> February 2024)**

Source: SD Focus Ltd, 2024

## CHAPTER 4: PROFILE OF THE PROJECT AREA

### 4.1 Project location

The Project will be implemented in four Regions covering a maximum of 300km of MV line; 105km will be in URR covering 14 villages along 4 corridors; in CRR covering 158km in 79 villages in 15 corridors, in LRR covering 4 villages in 2 corridors, and in the NBR with 1 corridor of 37km. Table 4.1 indicates the summary of the affected communities, and Appendix 4.1 provides the details. Figure 4.1 shows the location map of the project area.

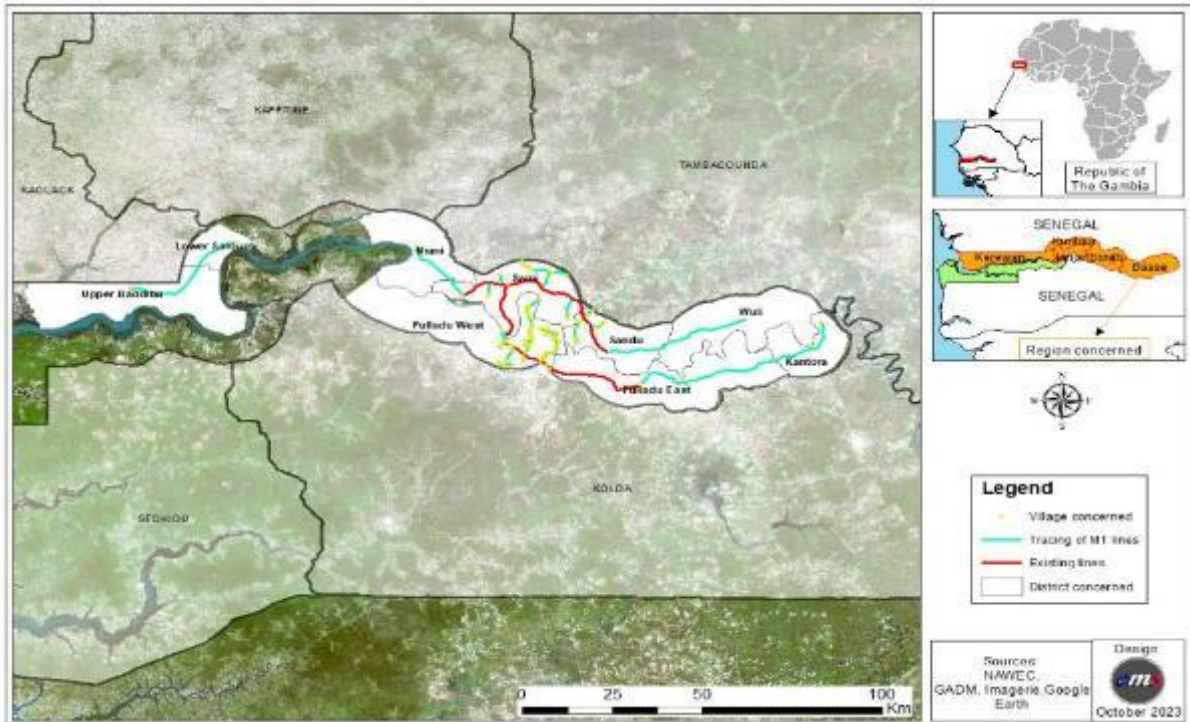


Figure 4.1: Global location map

Source: CHEMAS CONSULTING GROUP, LLC.

### 4.2 Description of sites and land use

#### 4.2.1 Routes of the proposed transmission corridors

Usually, NAWEC transmission lines are constructed along the road alignments, for the most part occupying a defined right of way (ROW) for the various categories of the national road network. The different categories include:

- i. **Primary roads** where the ROW is 40m from the center of the road on either side. These are “all-weather” roads and include the main trunk roads with bituminous finishing that connect large towns and communities. This is the type that runs between Bansang and Sare Bojo in CRR and URR-South respectively; between Kerewan and Suwareh Kunda in the NBR; between Soma and Misira in Jarra West and Toniataba, Kiang East in LRR. In URR-South, this is found between Sambuya and Sare Bojo via the village of Sare Bakary.

Along these corridors all the poles are usually constructed within the defined ROW, and therefore do not impact any private property.

- ii. **Secondary roads** have a ROW of 15m from the center of the road on either side, and they usually connect a particular region or locality to the primary network. Secondary roads have a lower standard in terms of quality than the primary road network.

This is the type of road that connects some of the communities that will be impacted by the project, and they include between Bantanto and Manneh Kunda; from Renerou junction to Tabanani; between Charen, Belal Fass, Sare Debo and Sare Tamanso, all in CRR-North.

- iii. **Urban roads**, (7.5m on either side of the centerline) which are usually located in urban centers and provide access to residential and commercial areas. These usually carry heavy traffic and are thus built to a higher standard in terms of quality and durability.
- iv. **Feeder roads** have a ROW of 15m on either side of the center line and are used for access between villages and the more remote areas of the country; they also provide access to farms, processing centers and rural markets.

Along these corridors poles are usually constructed within farmlands since the width of the roads are usually less than 15m, and thus the available service route is inevitably within adjacent farmlands. It is along such road corridors where the majority of the PAPs' lands has been recorded.

Typically, these include most of the corridors, and they include such as in CRR- South from Corridor 5 between Tamba Kunda to Sare Duta Wally (corridor consisting of 22 communities) and corridor 6 which starts from Santanto Bubu to Sinchu Samba Jawo, through 22 other communities.

In URR-North these types of roads are found along Corridor 1: Fittu Fula to Kujew Mandinka; Corridor 2: Changai Wollof to Daru Salam; Corridor 3: Renerou Junction to Sama Kunda via Ranerou Woloff, Tabanani, Chamen, Tabayel and Mbafaf, etc.

#### 4.2.2 Agricultural Land

Much of the proposed line corridors run through agricultural land, used for cultivation of a variety of crops including groundnut, maize, millet, rice, etc. The populations are principally subsistence farmers; the proposed lines will pass, for the most part, through the farmlands, behind the communities, rather than through them. This will avoid impacting houses and other private structures located along the usually narrow village pathways, to minimize the potential social impacts. Thus, the Project will impact mainly the farmlands.

#### 4.2.3 Crops

The principal annual food and cash crops cultivated by the farmers comprise millet, maize, sorghum, groundnuts, etc. These crops combined are important sources of food, nutrition and cash income of families and individuals. Therefore, the destruction of these crops would impact the livelihood standards of the famers and would warrant a compensation package for them.

The RAP process was undertaken in the month of December 2023, a period when there is usually no farming activity out in the fields, and therefore none of the above crops was encountered. Besides, the NAWEC contractors are not allowed to work in the fields during the rainy season (May/June to October) when these crops are cultivated, and therefore it is not expected to have any crop destruction. s

However, should there be any need for the contractors to carry out work in the fields whilst the farmers are cultivating these crops and happen to disturb or destroy them, they will have to be compensated using the formula in Section 6.1.5. The GRM will be used to identify any crop that is disturbed or destroyed during line construction.

#### 4.2.4 Fruit trees

Fruit trees are planted along the proposed line trajectories outside private compounds aligning the road corridors, or within compounds. Typically, mango trees are the main fruit trees that will be potentially impacted by the lines; they are planted along some of the proposed corridors notably in the villages of Mabali Koto and Misira in Upper Fulladu, CRR-South.

The trees are important as a source of supplementary food for families, and in some instances, the fruits provide cash to the owners when sold at local markets. The mango tree also provides shade for family and individual relaxation. Thus, felling the trees by NAWEC's contractors to make way for the lines could deprive these families of both food and income sources.

However, the ESMP advises to only trim the branches within the line's trajectory. Should there be need to cut down any private fruit tree, please see Section 6.1.3 on how to calculate the compensation.

#### 4.2.5 Human and socio-economic environment

In Table 4.1 is the summary of the demography of the communities that will be connected. NAWEC plans to connect seven 7 districts in four Regions (LRR, NBR, CRR and URR) with electricity in 100 communities. The villages have a total of 5,694 households with a total population of 45422 persons (male population 21804 – 48%, and female population 23618 - 52%).

**Table 4.1: Summary of demographics of communities to be connected**

Region	Districts	Villages	House holds	Population		
				Male	Female	Total
Lower River Region	2	4	2,576	7313	8018	15331
North Bank Region	1	2	816	2715	3119	5,834
Central River Region North	1	18	397	1953	2169	4,122
Central River Region South	1	62	1,501	7,472	7,928	15,400
Upper River Region North	1	13	268	1,563	1,570	3,133
Upper River Region South	1	1	136	788	814	1,602
<b>Total</b>	<b>7</b>	<b>100</b>	<b>5694</b>	<b>21804</b>	<b>23618</b>	<b>45422</b>

Source: Adapted from GBOS, 2019

#### 4.3 Process to identify the project affected persons (PAPs)

The process to identify the PAPs was varied depending on the type of impact. In the case of loss of farmland for erection of poles, once the position of the pole was identified, the PAP/owner of the farmland was traced and identified with the assistance and confirmation of the Alkalo (village head).

A few of the community members (including the Alkalo or his representative) were then physically taken to the farms where they confirmed the ownership and length/extent of the farms before measuring their lengths along the line trajectory using GPS technology. These are usually small communities where every person practically knows whose farms will be impacted when the trajectory of the lines was explained during the community consultations prior to the visit to the fields.

It was indeed during the consultations and field visits that the identities of the potential PAPs were known, and the sequence in which the impacted farms were located in relation to one another. The PAPs were then interviewed using the survey questionnaire to collect socio-economic details about them.

For loss of fruit trees, the impact was physically identifiable along the proposed MV line trajectory. When the trees were identified along the line trajectory and believed to be potentially impacted (with the assistance of the NAWEC Engineer/Planner) the owner (i.e., the PAP) of such trees was traced and identified with the assistance of the Alkalo. His/her details were subsequently taken by completing the designed questionnaire.

#### 4.4 Categories and types of impacts and persons affected

##### 4.4.1 Types of project impacts

Two types of project impacts were identified as indicated below:

- i. **Loss of agricultural land:** Construction of every pole on the farmlands will deprive affected farmers the use of at least 2m x 2m (or 4m<sup>2</sup>) area of land for ever. Although relatively small, the area occupied by each pole will be converted to concrete and would no longer be available to the farmer for any future crop production.
- ii. **Loss of income and food from trimming of fruit trees:** Although minimal, private fruit trees will be trimmed during line stringing to make way for the transmission lines. The trees provide economic benefit for their owners and in trimming them, the portions lost will not bear fruits for the next two years thus depriving the owners the produce and income from that part of the tree. They will be compensated for those two years of work and economic loss of fruit trees until the new trees they will plant become mature.

##### 4.4.2 Project Affected Persons (PAPs)

In this study only one type of PAPs was enumerated, and they were:

###### Individual PAPs

A total of 337 individual farmers will have poles located on their farmland, which is under customary tenure. They will be affected by the land use or acquisition needs of the Project; they are affected because they will lose, be denied to the areas where the poles will be constructed.

Thirteen (**13**) persons in two communities own fruit trees that will be trimmed during the construction of the lines are another set of individual PAPs. This group lives in the communities of Mabali Koto and Misira in Upper Fulladu West in CRR-South.

Another set of individual PAPs would potentially be farmers who cultivate cash/food crops such as groundnut, millet, sorghum, etc. under the lines; they could be impacted if the NAWEC contractors decide to construct the lines during the rainy season (May/June – October) when these crops are under cultivation, and thus be destroyed or disturbed. This type of individual PAPs was however not encountered along all the line corridors during the socio-economic census as it was done during the period of the year when the land is not in cultivation.

## CHAPTER 5: THE CENSUS AND SOCIO-ECONOMIC SURVEY

### 5.1 Objectives of the survey

The public consultations and awareness creation were followed by a census and socio-economic survey as prescribed in the Bank's OP 4.12. According to this policy, where land acquisition or restrictions on land use are unavoidable, a RAP needs to be developed as part of the environmental and social assessment. Thus, a census should be conducted to identify the persons who will be affected by the project; this will establish an inventory of land and assets to be affected and will also determine who will be eligible for compensation and assistance. In conjunction with the census a cut-off-date for eligibility will need to be established and disseminated throughout the Project's sphere of influence. The 29<sup>th</sup> of December was the cut-off-date in this project.

The census and survey provided the opportunity for the Consultant to:

- Establish a social profile of the affected population, especially the PAPs (such as household composition, education, health, and welfare, etc.)
- Identify the affected households and individuals
- Identify vulnerable individuals or groups
- Record all assets and properties (including land) impacted and determine the nature of the impact by the Project
- Provide a baseline for monitoring and evaluation.

### 5.2 Methodology

The survey utilized a structured questionnaire administered to all the PAPS identified (attached as **Appendix 5.1**). Prior to administering the questionnaire to each PAP, its content was explained, and purpose of requested information disclosed and carefully explained. The collected data was coded, entered in a database, and analyzed using Excel.

The attendees of the consultations included the persons enumerated as PAPs; these persons were further interviewed to collect socioeconomic data including demographic (age, sex, household size, health, education, occupation, etc.). This information is useful in providing a better understanding of the communities affected by the Project.

The survey data collection was conducted from 16<sup>th</sup> to 29<sup>th</sup> December 2023. Where identified PAPs were not present for reasons ranging from being absent from the village on personal business, or any other reason, their telephone numbers were obtained (where possible) to be interviewed by phone. Follow-up calls to many of these PAPs proved very difficult, as they could not be reached because their phones were not continually switched- off, or the network connections were not good enough to establish contact. In view of this the Cut-off date had to be decided as a month from the last date of the census and survey; the cut-off date was therefore pegged at 29<sup>th</sup> December 2023.

### 5.3 Principal findings of the socioeconomic survey

Analysis of the socio-economic data for the beneficiary communities is presented in the following Tables. A total of 78 household heads were interviewed, and 1,145 persons within these households will be affected by the Project.

## The demographic characteristics

### ***PAPs' household sizes and composition***

Table 5.1 presents the household sizes and composition. The age cohorts of 15-29 years form the majority of the PAPs, making up 412 (36%) of the total population of 1,145. Compared with the children (cohort 0-14 years) 332, were enumerated, and they made up 29% of the population, after the 15-29-year cohort.

Along gender lines, the male population makes up 617 (54%) of the total PAPs, whilst the women make up 538 (47 %).

For the age cohort of the elderly (>65 years) or the vulnerable groups, the survey enumerated 44 persons.

**Table 5.1: Household size and composition**

Age categories in households	Total	Frequency			
		Male	Percent	Female	Percent
0 – 4	73	46	4	27	2
5 – 9	142	78	7	64	6
10 – 14	117	59	5	68	6
15 – 19	180	96	8	84	7
20 – 24	110	63	6	47	4
25 – 29	122	59	5	63	6
30 – 34	98	48	4	50	4
35 – 39	59	22	2	37	3
40 – 44	58	31	3	27	2
45 – 49	51	24	2	27	2
50 – 54	47	24	2	23	2
55 - 59	19	13	1	6	1
60 – 64	25	20	2	5	0
65 – 69	13	11	1	2	0
> 70 – 74	31	23	2	8	1
<b>Total</b>	<b>1145</b>	<b>617</b>	<b>54</b>	<b>538</b>	<b>47</b>

Source: SD Focus Ltd, December 2023

### ***Main occupation of PAPs***

Table 5.2 indicates the main occupations of the PAPs. The majority of the PAPs enumerated 237 (or 89%) of household heads, and 854 persons (52%) of the other household members) are farmers. These rely almost exclusively on agriculture and livestock for their subsistence.

Agriculture in these communities is mainly subsistence rain-fed, producing food crops such as cereals (early millet, late millet, maize, sorghum, rice, etc.). However, cash crops (mainly groundnuts), account for a greater portion of the production. The cultivation of horticultural crops (vegetables and

fruits) is also practiced but mainly by women farmers growing tomatoes, okra, sorrel, etc. during the dry season.

Another important occupation of the PAPs is business and trading (in vegetable selling, small shops, etc.) which forms 2% of both household heads and of other household members. Civil servants (mainly security officers, and private sector employees) make up 3% of HH and only 1% from other household members.

**Table 5.2: PAPs' main occupation**

Type of occupation	HH Heads		Other HH members	
	Frequency	Percent	Frequency	Percent
Farming (crop and livestock)	237	89	854	52
Fishing	0	0	0	0
Business (cattle buying/selling; petty trading- vegetables, small shop, etc.)	6	2	30	2
Civil service (security officer, Arabic teacher, private sector employees)	7	3	21	1
Housewife	1	0	75	5
Tailor	1	0	4	0
Carpentry	5	2	12	1
Mason	0	0	9	1
Driving	0	0	18	1
Welding	0	0	7	0
Marabout	1	0	0	0
Mechanics (including plant operators)	0	0	1	0
Technicians (including plumbers, mobile repairers, electricians, etc.)	1	0	2	0
Students	0	0	452	27
Others (Specify)	3	1	19	1
None	5	2	149	9
<b>Total</b>	<b>267</b>	<b>100</b>	<b>1653</b>	<b>100</b>

Source: SD Focus Ltd, December 2023

### **Health Status of PAPs**

Table 5.3 indicates the health status of the PAPs, with (144 persons, or 66%) of HH and 1,524 persons or 90%) of other household members reporting no ill-health or disease. Twenty-four of the HH (11%), out of a total of 219 HH were recorded as being hypertensive; only 20 persons, or 1%, (from a total of 1,694) of the other household members (1%) were recorded as hypertensive. Two cases of HIV/AIDS were reported among the other household members.

**Table 5.3: Health and disease affecting PAPs**

Type of disease/health condition	Household head		Household members	
	Frequency	Percent	Frequency	Percent
None	144	66	1524	90
Diarrhea	0	0	6	0
HIV/AIDS	0	0	2	0

Diabetes	2	1	4	0
Hypertension	24	11	20	1
Cancer	1	0	0	0
Respiratory Disease	9	4	8	0
Malaria	12	5	10	1
Stomachache	6	3	24	1
Ear problem	4	2	44	3
Eye problem	2	1	1	0
Tuberculosis	0	0	5	0
Undisclosed	0	0	0	0
Others (epilepsy; arthritis; headache; back ache)	15	7	46	3
<b>Total</b>	<b>219</b>	<b>100</b>	<b>1,694</b>	<b>100</b>

Source: SD Focus Ltd, December 2023

### ***Education level of PAPs***

The education level of the PAPs is presented in Table 5.4 below. The level is generally low among both HH (household heads) 50% of whom had no education, and the other household members (40% of them).

Literacy level in Arabic/Quran among HH (32%) is low, but relatively high when compared to the level attained by the other household members (16%) indicating importance of Arabic and/or knowledge of the Quran to the HH.

**Table 5.4: Literacy level attained by HH and household members**

Level attained	HH Heads		Other HH members	
	Frequency	Percent	Frequency	Percent
Primary =1	23	9	363	21
Secondary = 2	18	7	340	20
Tertiary =3	4	2	15	1
Arabic/Dara = 4	80	32	280	16
No Edu. = 5	124	50	687	40
ECD = 6	0	0	16	1
<b>Total</b>	<b>249</b>	<b>100</b>	<b>1701</b>	<b>100</b>

Source: SD Focus Ltd, 2023

### **\* ECD = Early Childhood Development**

Secondary school level of education, especially among the household heads (7%) is much lower than the level of the other members of the household which is at 20%. Primary school level education is equally lower among the HH (9%) than among the other members of the household (21%) in this survey.

### ***Marital status of Household Heads***

The marital status of the HHs is presented in Table 5.5. Overall, 238 of the HHs (96%) were married, whilst only 11 (4%) of HHs were single. Fifty-two percent of the HHs had only one wife, and 31% (77 HH) had two wives; only three HH had 4 wives.

Other categories such as (divorced, widowed, single-parent households, etc.) were not captured in the survey.

**Table 5.5: Marital status of Household heads**

Status	Frequency	
	Total	Percent
Single	11	4
Married with 1 wife	130	52
Married with 2 wives	77	31
Married with 3 wives	28	11
Married with 4 wives	3	1
<b>Total</b>	<b>249</b>	<b>100</b>

Source: SD Focus Ltd, 2023

***Vulnerability status of PAPs***

Seventy-four persons were enumerated as vulnerable, and they included various forms of vulnerability such as by virtue of age; this group included men who are above 70 years, and women with 65 years or more. Men and women who are seventy and sixty-five years and above respectively in these communities are regarded as generally vulnerable in that they have passed their days when they are able to do laborious work to provide their daily needs from, for example farming activities, which is mostly the primary economic activity within these communities. Of this category, 54 persons (44 men-81.5% and 10 female-18.5%) were recorded. Another vulnerable group enumerated included five women household heads. Table 5.6 below shows the vulnerable persons in the various categories and Appendix 5.2 gives the details.

Due to their status, vulnerable persons are more likely to be adversely affected by the Project impacts and/or more limited than others in their ability to take advantage of the Project’s benefits. They are also more likely to be excluded from, or unable to participate fully in the mainstream consultative process and as such may require specific measures and/or assistance to do so. Persons with disabilities, for example may be unable to attend meetings for reasons due to their inability to reach the venues, and in this way will be excluded, and their voices and opinions may not therefore be considered.

**Table 5.6: Vulnerability status of PAPs/household members**

Vulnerability type	Male	Female
None	919	912
Elderly woman – 65 years above	0	10
Elderly man-70 years above	44	0
Female-heading a household	0	5
Persons living with disabilities	0	0
1- Hard of hearing	0	0
2- Blind	8	5
3- Mental health	0	0
4- Crippled	0	0
5- Physical illness	0	1

6- Other (specify)	0	1
<b>Total</b>	<b>971</b>	<b>934</b>

Source: SD Focus Ltd, 2023

According to the Bank’s OP 4.12, and ESS6 requirements, special attempts should be made during the consultations to involve the vulnerable groups; all necessary assistance and support to these groups will be ensured in the implementation of the Project. To this end in the few instances encountered, the Consultants met and discussed with some PAPs identified as sick and bed ridden, or too old to walk to the venues.

Even though the impact of the project activities is relatively small (4m<sup>2</sup>) and may not affect the livelihood of the PAP significantly, the project support to the vulnerable will help to alleviate some of the economic difficulties inherent in these communities. This group will receive special assistance and support during the implementation of this RAP as part of the project’s benefits, as indicated in Section 6.2.6.

**CHAPTER 6: VALUATION AND COMPENSATION FOR LOSS OF LAND AND AFFECTED TREES**
**6.1 Entitlement policy**

**Table 6.1** presents the summary of the Bank’s principles and policies that will guide the valuation and compensation of the assets impacted by the Project; the compensation measures for loss of land will follow the principle that the land and any structures on it will be valued at their full replacement cost. This will ensure that the PAPs experience no net loss.

In this project the only impact types identified were loss of agricultural land to host the poles and trimming of mango branches to make way for the lines during stringing.

**Table 6.1: Evaluation of land and other assets and compensation methods applied**

Compensation category	Types	Compensation method	Remarks
<b>Land acquisition and compensation (Permanent acquisition)</b> <i>Note: If remaining parcel is not viable, owner has right to require purchase of entire parcel.</i>	Farmlands (approx. 4m <sup>2</sup> ) lost to pole	Prevailing market value of the land to be acquired; otherwise, replacement value.  <i>Owner has the opportunity of being allocated a new plot if one is available and it is suitable to owner’s needs</i>	None of the PAPs requested their impacted land to be compensated given its small area. The project will compensate farmers for the permanent loss of their land occupied by the poles.
Crops under the lines	Groundnuts, millet sorghum, etc.	Prevailing market value of the crops impacted	Crops under the transmission lines are not expected to be disturbed during the construction phase since this will take place in the dry season.  Nevertheless, if they are impacted, they will be compensated at prevailing market rates.

Fruit trees	Fruit trees to be trimmed (mainly mangos)	Number of mango trees affected (x) the average actual/potential yield/tree (x) the prevailing market price divided by one third of annual potential yield (x) 3 years of loss production	It is assumed that only 30% of the tree would be trimmed, and thus PAP would lose 3 years of income commensurate with 30% of trimming
Fruit trees	Fruit trees to be cut down	$V = (NT \times Y \times P \times PROD)$ Where: V = Value of the tree (i.e., replacement cost) NT = Number of trees impacted Y = Average actual/potential yield/tree P = Price of the fruit per kg PROD = Productive years of the tree at time of felling	It is assumed that the entire will be felled
loss of revenue derived from economic activities	Formal and informal businesses, economic activities along the right of way that will be temporarily disturbed during construction	They will be provided assistance for the loss of revenue during the period that their economic activities are disrupted. An analysis will be done of their daily earnings to derive the amount of resettlement assistance provided.	These types of PAPs were not identified during the socio-economic survey as the sub-project mainly passes through rural / agricultural land. If impacted, these PAPs will be identified during the construction phase through the GRM and be compensated based on the methodology identified in this RAP.

### 6.1.1 Eligibility criteria for affected persons

According to OP 4.12, and ESS6 any person who will suffer loss or damage to a building, business, trade, or loss of access to productive resources, as a result of the Project will be considered eligible for compensation and/or resettlement assistance by the 29 December 2023, which is the cutoff date

to be eligible for compensation in this GERMP backbone phase III. Thus, the PAPs impacted by this Project are:

- Those who have formal legal rights to economic assets (including customary and traditional rights recognized under Gambian laws).
- Those with informal rights such as renters, squatters, etc.

### **6.1.2 Entitlement policy of PAPs losing fruit trees due to trimming**

As mentioned earlier, fruit trees are an important source of supplementary food for the families, and they also provide cash to the owners when the fruits are sold at local markets. Therefore, NAWEC will only trim the trees to allow the passage of the lines; it is estimated that only thirty percent of the tree branches will be trimmed. This means about 30% of its potential yield<sup>2</sup> will be lost and would take at least 2 years for the regeneration of the branches, and to bear fruit again.

To determine the basis of the compensation for trimmed mango and cashew trees investigations conducted within the area, established the following:

- The average/potential total yield of a mango tree per season = 150kg
- The prevailing market price of a kilo of mango on the local market = D25/kg
- The average potential yield for cashew per season per tree = 350kg
- The prevailing market price for cashew nuts = D30/kg

Given the above, the computation of the compensation with regards impacted mango and cashew trees will be as follows:

$$V = (NT \times Y \times P) / 3$$

Where:

V = Value of the tree (i.e., replacement cost)

Y = Average annual yield of the tree

P = Price of the fruit per kg

NT = Number of trees impacted

i.e., number of mango/cashew trees trimmed x the average actual/potential yield/tree x the prevailing market price divided by one third of annual potential yield x 2 years of lost production.

### **6.1.3 Entitlement policy for total loss of fruit tree**

Even though the RAP process did not identify any fruit/productive trees that need to be felled, the RAP provides a methodology for compensation of fruit trees should the need arise during the construction phase to cut the trees down.

The compensation methodology that will be used to evaluate trees is estimated by multiplying the number of fruit trees affected, multiplied by the average actual/potential yield/tree, multiplied by the number of productive years at time of felling, all valued at prevailing market price. The

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<sup>2</sup> information on annual yield per tree and price per kilo was given by the PAPs

mechanism will take into consideration the principle of full replacement value and thus, the formula will be as follows:

$$V = (NT \times Y \times P \times PROD)$$

Where:

V = Value of the tree (i.e., replacement cost)

NT = Number of trees impacted

Y = Average actual/potential yield/tree (kg)

P = Price of the fruit per kg

PROD = Productive years of the tree at time of felling

#### 6.1.4 Entitlement policy for PAPs losing farmland to the poles

The total number of PAPs on whose farmland poles will be constructed was 337 from 72 communities. The mechanism for compensating loss of land size (4m<sup>2</sup>) to accommodate a pole will be:

- The provision of replacement of farmland of equivalent size, satisfactory to the PAP, or in cash. Since no PAP requested replacement of the land due to its small size, all of them requested to be paid in cash.

Thus, each will be compensated at full replacement cost (at 2023/2024 prices) of the size of land lost, without deduction or depreciation. To determine the replacement cost of land to be lost to the project, the Consultant carried out a study of land prices in the various Districts (as was done on another similar occasion in 2020) between 15<sup>th</sup>-29<sup>th</sup> December 2023. Community members were asked how much land of 400m<sup>2</sup> would cost within their areas, and the figures they gave were analyzed to obtain a hypothetical cost of farmland per square meter in each District as shown in Table 6.2 below.

This figure was adjusted to cater for increases in inflation rates, and in price of groundnuts (the cropland that is mostly impacted by the project). In 2020, inflation rate in The Gambia stood at 5.93% compared to 18.5% in 2023, an increase of 12.6%. As a major determinant of commodity prices including land, this huge increase in inflation can therefore have an impact on general prices of land especially agricultural land. Thus, the results of the studies in 2020 and 2023 were used in analyzing the trend of potential land prices between the two periods as they prevail in the impacted Districts of the Project.

As all lands impacted by this Project are basically agricultural land (in most cases for cultivation of groundnuts), the recent high increase in the price of groundnuts from D20,700 per ton in 2020 to D38,000 per ton in 2023 (an increase of 83.6%), will ultimately have a significant impact on how agricultural land will be generally used in the impacted Districts and therefore its price, if it were to be sold. Consequently, the increase in the price of groundnuts was also a major consideration in determining the cost of a square meter of agricultural land in the impacted Project areas.

From the above, the cost of 4m<sup>2</sup> farmland will be at prevailing market rates ranging from D144.4 in Sandu District, D155 in Sami District, and D158.6 in Upper Fulladu West. In this regard, the 4m<sup>2</sup> area of land will be multiplied by the average cost of similar land, and the total number of poles in each PAP's farm to obtain the compensation for each PAP. **Table 6.2** shows the combined results of all these analyses to determine the replacement cost of farmland per square meter.

The number of poles to be located on a farm was determined by measuring the length of the farm along the proposed line trajectory using GPS technology. This was then divided by 100 meters (the average distance between poles) and 1 added to the result. This was necessary to ensure that at least

a pole is erected on any farm whose length is less than 100m and the last pole is located less than 100m from the start of the farm. A total of 337 PAPs will have poles erected on their farmlands within these communities. X

**Table 6.2: Determination of price of farmland per m<sup>2</sup>**

District	Mean price of farmland per m <sup>2</sup> (as deduced in 2020) (I) (GMD)	Mean price of farmland (as deduced in 2023) (II)	Mean price (Mean of I and II) (III)	12.6% diff. in inflation rate in 2023 (%+III) (IV)	83.6% increase in price of groundnuts in 2023 (%+III) (V)	Final price of land per m <sup>2</sup> (GMD)
Sami	85	175	130	146.4	238.7	155.0
Upper Fulladu West	85	181.5	133	148.8	244.2	158.6
Sandu	75	168	121	136	222.1	144.4

#### **X 6.1.5 Entitlement policy for farmers losing crops**

As indicated above, no crop was found in the fields during the RAP census, however, should there be any need for the contractors to carry out work in the fields whilst the farmers are cultivating these crops and happen to disturb or destroy them, the crops will be compensated.

In the light of this, the valuation would be based on the unit area cultivated (in ha) multiplied by the yield potential (kg)/ha which depends on the crop quality, multiplied by the prevailing market price (price/kg) of the crop to derive the value of income from one season's production. The same computation methods would be used for the following year's harvest. Thus, the formula below should be used:

$$V = UA \times Y \times P$$

Where UA = Unit Area (ha)

Y = Average/potential yield

P = Prevailing market price x 2 growing seasons

#### **6.1.6 Entitlement policy for loss of revenue derived from economic activities**

This category of entitlements covers PAPs who, whether or not they have ownership rights to affected land or structures, are current residential or commercial occupants of these lands or structures and will experience disruption to their living arrangements or livelihoods.

The main groups in this general category include farmers, economic and business operators (whether owners or renters of their premises) and squatters (such as Right of Way (ROW) occupiers).

This category covers the following impacts:

- (i) Loss of income from rent and expenditure incurred for alternative accommodation during reinstatement period;
- (ii) Loss of wages, loss of fees from apprentice, loss of job training;
- (iii) Loss of business income and loss of business goodwill.

For category (i) the comparative method is used based on the average monthly net profit, and for category (ii) the comparative method is used, and compensation is based on going fees and wages. These two categories are not usually found along the ROW of the transmission lines in the districts where the project will be implemented.

Category (iii) is usually the type that is encountered in similar projects along the road corridors in this country, and it involves temporary loss of business income whilst project activities are ongoing. The economic operators here are essentially squatters occupying the ROW of the lines along the road corridor and conducting business from mostly movable structures such as tables, stalls, or make-shift kiosks, or even displaying their goods on the ground.

They will be unable to carry out their normal business operations during the erection of pole and stringing of lines along the ROW. As a result, they will be entitled to compensation for loss of daily earnings derived from an analysis of the average daily income that each derives from his/her business operations. This will finally be multiplied by the number of days the works are projected to last. They can resume their business activities at the usual spots when the works are completed.

#### **6.1.7 Cut-off Date**

The cut-off date for being eligible for compensation and/or resettlement assistance was 29<sup>th</sup> December 2023, which was the last day during which the socio-economic survey was completed. Beyond this date, aggrieved PAPs' complaints will be addressed by the Grievance Resolution Committee (GRC) located at the Offices of the Governors of URR, CRR, NBR, and LRR as indicated in Appendix 6.1.

#### **6.1.8 Proof of eligibility**

Proof of eligibility will include various forms of evidence including the following:

- PAPs with formal legal rights, documented in the form of certificates endorsed by the Alkalo or Area Council as required by law.
- Alternative means of proof of eligibility will include witnessing or evidence by recognized traditional authority, Seyfo, family heads and elders and the general community.
- Rental agreements for persons who rent land- they can show length of tenure to prove their eligibility.
- People who are using the land before the cut-off date but have not formal title.

#### **6.1.9 Notification**

All farmlands and economic trees affected by the Project were valued and assessed according to OP 4.12 and ESS6. Owners of the farmlands and economic trees were notified in several ways, including one-on-one notification during the socio-economic survey, and also during public consultations.

Series of public announcements of the RAP process was made over the national radio as well as community radio stations located within the Project's area of influence. **Appendix 6.1** is a copy of the announcement.

## **6.2 The entitlement matrices**

This section presents the financial entitlements due to the PAPs based on the different types of impacts such as impact on fruit trees through trimming, and the impact on the farmlands due to the land-take for the construction of the poles.

### 6.2.1 Entitlement matrix for trimmed trees

Appendix 6.2 indicates the entitlement matrix of the PAPs whose trees will be trimmed, and Table 6.3 provides the summary. A total 13 PAPs from two communities were enumerated as impacted by tree trimming. Thirty-one trees were impacted (1 cashew tree and 30 mango trees) in the communities of Mabali Koto and Misira in CRR-South in Upper Fulladu West District. Eighty-two thousand (**D82,000.00**) Dalasi compensation will be paid to the 13 PAPs.

Using the formula  $V = ((NT \times Y \times P) / 3) \times SY$

Where:

V = Value of the tree (i.e., replacement cost)

Y = Average annual yield of the tree

P = Price of the fruit per kg

NT = Number of trees impacted

SY = Subsequent years to compensate for loss (2 years)

**Table 6.3: Summary of entitlement matrix for trimmed trees**

Region/District	No. of villages	PAPs	No. of trees	Compensation (D)
Lower River Region – Jarra West District	0	0	0	
Lower River Region – Kiang East District	0	0	0	
North Bank Region – Lower Badibu District	0	0	0	
Central River Region North - Sami District	0	0	0	
Central River Region South - Upper Fulladu West District	1	13	30	75,000.00
	1		1	7,000.00
Upper River Region North - Sandu District	0	0	0	
Upper River Region South - Fulladu District	0	0	0	
<b>Total</b>	<b>2</b>	<b>13</b>	<b>0</b>	<b>82,000.00</b>

### 6.2.2 Entitlement matrix for total loss of a mango tree

The RAP has not estimated any compensation for a mango tree that will be felled. However, should there be any need in the course of line construction, to fell a mango tree (or any private fruit tree) the formula in Section 6.1.3 will be applied in order to compensate the owner.

### 6.2.3. Entitlement matrix for loss of farmland

Appendix 6.3 provides the details of the matrix for lost farmland, and Table 6.4 below provides the summary. A total of 72 communities will have poles and power lines constructed within them impacting 337 PAPs' farmlands. Total compensation to be paid is D624,185.00

**Table 6.4: Summary of entitlement matrix for lost farmland**

Region/District	Number of villages	PAPs	Compensation (D)
Lower River Region – Jarra West District	2	0	0
Lower River Region – Kiang East District	1	0	0
North Bank Region – Lower Badibu District	2	0	0

Central River Region North - Sami District	17	89	156,613.00
Central River Region South - Upper Fulladu West District	44	180	319,961.00
Upper River Region North - Sandu District	12	68	147,611.00
Upper River Region South - Fulladu District	1	0	0
<b>Total</b>	<b>78</b>	<b>337</b>	<b>624,185.00</b>

#### 6.2.4 Entitlement matrix for loss of food and cash crops

As there was no crop found in the fields that will be impacted by the project during the development of the RAP there was no compensation computed. However, see Section 6.1.5 should the need arise, especially during the rainy seasons when the farms are under cultivation.

#### 6.2.5 Entitlement matrix for loss of revenue and earnings from economic activities

Given that economic operators were not encountered along the impacted road corridors in the course of developing this RAP, compensation was not computed. However, should a person (s) be impacted in the course of implementing the project, especially during pole construction and line stringing, refer to Section 6.1.6 above to estimate the compensation.

#### 6.2.6 Assistance to vulnerable groups

Although the assets that will be lost by the families may not substantially affect the livelihood of the PAPs and their households, it is desirable to extend some support and assistance to certain vulnerable members of the communities; this support can be regarded as project benefits to these community members.

A total of seventy-four persons were enumerated as vulnerable, among them are five females that are household heads. It is recommended that the five female household heads (HHs) be supported by providing them with food items i.e., one bag of 50-kilogram rice and one 20-litre cooking oil totalling D18,000.00 (eighteen thousand Dalasi).

The other vulnerable persons enumerated total 69, and each will be provided with a lump sum amount of D2,000, or the same equivalent in kind (food) as project support. One hundred and fifty-six thousand (**D156,000.00**) Dalasi will be paid as project support to these persons. See Table 6.5 below for details.

Meanwhile, those PAPs who do not have valid IDs and other relevant documentation, will be assisted by the project, in consultation with the various Alkalo where necessary. In the meantime, whilst their compensation is being paid during the implementation of this RAP, the PIU will accept alternative proofs (besides ID cards) of eligibility of the PAPs, such as from the Alkalo or other recognized traditional authority in the village in order to get paid.

**Table 6.5 Proposed support to vulnerable groups**

Item	Quantity	Unit price (D)	Total
<b>Five female HH</b>			
50kg bag of rice	5	2,000.00	10,000.00
20L tin of cooking oil	5	1,600.00	8,000.00
<b>Other vulnerable persons</b>			
Lump sum financial support	69	2,000.00	138,000.00
<b>Total</b>			<b>156,000.00</b>



## CHAPTER 7: MECHANISMS FOR PREVENTION AND RESOLUTION OF CONFLICTS

### 7.1 Types of potential complaints and conflicts to resolve

During the RAP development and implementation, and during the Project implementation, potential complaints and conflict may arise due to involuntary resettlement and loss of livelihood resulting from the proposed Project activities. Some stakeholders may also want to make suggestions relating to the Project activities and should be provided the platform. Likely types of conflicts and complaints include the following:

- PAPs not identified
- PAPs identified and not listed
- Inadequate assistance and related information
- Choice of project design or activities
- Complaints in the amount of compensation and rates used
- Disputes about ownership and equity in the amount of compensation received
- Delay in disbursement of assistance
- Disturbance/Destruction of crops during line construction
- Losses not identified correctly.

### 7.2 Prevention and resolution of grievance and conflict

Complaints or recommendations from stakeholders and project affected persons should be acknowledged, recorded, and duly addressed within reasonable timeframe. The Grievance Resolution Mechanism provides a platform to raise concerns regarding project-related activities and will help project management enhance operational efficiency in a variety of ways including: generating public awareness about the project and its objectives; deterring fraudulent activities; providing project staff with practical feedback that allows them to be more accountable, transparent and responsive to beneficiaries; assessing the effectiveness of internal organizational processes; and increasing stakeholder involvement in the Project.

In this regard, Grievance Resolution Committees (GRCs) have been created at regional levels, at the offices of the Governors with clear terms of reference for conflict prevention and grievance resolution. The GRC aims to address grievances and conflicts immediately at the community level. NAWEC and PIU staff should work closely with the communities to clarify and resolve any misunderstanding that could give rise to conflicts or further complaint.

As noted above, where PAPs have complaints or grievances to report, the PIU's contact persons are:

- Mr. Nuha Colley – Environmental Safeguards Specialist on Toll-free number:1266 (using Qcell and Gamcel): email: [ncolley@nawec.gm](mailto:ncolley@nawec.gm)
- Mr. Ousman Mankara – Social Risk Management Specialist on Toll-free number:1266 (using Africell and Comium): email: [omankara@nawec.gm](mailto:omankara@nawec.gm)

Where the dispute cannot be resolved at the community level, the affected persons will be advised to lodge a complaint to the GRC, and the Project staff should advise the party on how and where to file the complaint (at NAWEC PIU- Emporium Complex- Kairaba Avenue-Bakau or call this toll-free number 1266). Where a complaint has no merit (for example, not related to the Project) the GRC will refer the complainant to the relevant authority or other grievance process for redress.

Where traditional and administrative procedures fail to resolve disputes, the aggrieved party has the right to take the matter to the courts in accordance with the Constitution of The Gambia and other applicable national laws.

### **7.3 The Grievance Resolution Committee (GRC)**

The GRC consists of the following permanent members and ad hoc members based on the source of the complaint:

#### **Permanent members:**

- The NAWEC PIU Environmental Safeguards Specialist
- The Social Risk Management Specialist
- The Governor of the Region
- Representative of Department of Physical Planning and Housing
- Representative of Executive Director, NEA
- Representative of Director, Department of Lands and Surveys

#### **Ad hoc members:**

Specialized Government institutions (dependent on the type of complaint)

- Alkalo of the village where the complaint originated.
- 2 representatives of PAPs (1 male and 2 female) from the same community where the complaint originated.

#### **The functions of the GRC include:**

- Provision of support to PAPs on problems arising from loss of properties or livelihood as a result of the project
- Recording the grievances of the PAPs, categorization, and prioritization of the grievances that need to be resolved by the Committee
- Resolving grievances through amicable resolution methodologies (investigations, negotiations, proposing resolution strategies, ensuring resolution strategies are implemented, etc.)
- Keeping of records of grievances, maintaining registers, minutes of meetings, and correspondences for reference and inspection
- Reporting to the aggrieved parties about the developments regarding their grievances and the decision of the project authorities.

### **7.4 Grievances and appeals procedure**

The main objective of this procedure is to provide a mechanism to mediate conflict and cut down on lengthy and costly litigation. It will also provide PAPs who might have objections or concerns about their assistance, a public forum to raise their objections and through conflict resolution, address these issues adequately. The process involves:

- The complainant will file the grievance with the GRC, which will act within 7 days upon receipt
- If no understanding or amicable solution can be reached, or if the PAP does not receive a response from the GRC within 7 days of the registry of the complaint, he/she can appeal to the Governor of the Region, who should act on the grievance within 7 days

- If the PAP is not satisfied with the decision of the GRC they may submit the complaint to a court of law, at the local or national level. Note that PAPs can submit a complaint to the national judicial system at any time if they choose not to use the project’s GRM.

Any PAP affected will be exempt from all administrative and legal fees incurred pursuant to the grievance resolution procedures. All complaints received in writing (or written when received verbally) will be documented. GRC logistics (costs of litigation, inspection, training), resolution compensation, and court processes should be borne by the Project.

The GRM should be well publicized during stakeholder consultations and via other means such as the print and electronic media. These announcements should include the various options of sending a complaint (written or verbal) through the Alkalo, Village Development Committees, Regional Governors, NAWEC Headquarters and the PIU Office.

**Table 7.1: Proposed Grievance Resolution Mechanism for Ordinary Complaints**

Step	Process	Description / required action	Time-frame	Responsible agency /person
1	Receipt of complaint by the PIU	Document date of receipt, name of complainant, nature of complaint	1 day	GRC / PIU (Social Risk Management Specialist)
2	Acknowledge receipt of grievance	By letter, email, phone	1-5 days	Social Risk Management Specialist
3	Screen and establish the foundation or merit of the grievance	Visit the site; listen to the complainant / community; assess the merit	7-14 days	GRC members including the complainant or his/her representative
4	Implement and monitor a redress action	Where complaint is justified, identify and carry out the redress	21-30 days or at a time specified in writing to the complainant	Project Coordinator and Social Risk Management Specialist to coordinate the implementation of redress action
5	Extra intervention for a dissatisfied scenario	Review the redress steps and conclusions, provide intervention solution	2-4 weeks of receiving status report	GRC to review and react
6	Judicial adjudication	Take complaint to court of law	No fixed time	Complainant

#### **X 7.5 Specific process for GBV, SEA, SH, and VAC**

For sensitive issues including Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Harassment (SH) or Violence Against Children (VAC), an exceptional or ad hoc meeting will be called as soon as a complaint is received either through phone or face to face or email within 24hrs. It is recorded in the survivor register. Meanwhile, the survivor is supported with all the necessary services he or she needs.

The regional GERMP GRC/PSC, the contractor, and local authorities of the locality where this issue occurs will all meet as a plenary. They will be assisted by a service provider (or gender specialist of the Project) to guide them in this process, since these are sensitive issues which need special treatment. This service provider / specialist is in the process of being recruited and will be in place before the implementation of the RAP.

A committee is set up at institutional level, and an investigation team/panel is instituted (maximum of 4 members including the Gender Focal and a member of the GRC), and a decision-making body put in place to make decisions on findings of the investigation. In the meantime, the survivor is updated at every stage of the investigation.

Information on cases of GBV, SEA, VAC are treated or shared on a need-to-know basis, and confidentiality is maintained until the case closes. At all times, the approach for such issues will follow a survivor-centred approach and the anonymity of the survivor will remain intact. In addition, the survivor will be informed of options such as receiving psychosocial support, medical assistance, and other services as required.

In cases of rape and other capital offences, the police are informed, and legal services provided, and investigations started based on the consent of the survivor. If the survivor decides not to proceed with case, it must be respected. For capital offences, the national judicial system is used and the MGP is not implicated.

## **CHAPTER 8: MONITORING AND EVALUATION OF RAP IMPLEMENTATION**

### **8.1 Internal monitoring**

Internal monitoring and evaluation of RAP implementation will be carried out on a continuous basis by the GERMP PIU to ensure that all planned activities within the RAP are on track. This will be the responsibility of the Social Risk Management Specialist. NEA, in coordination with the EIA Working Group, the Regional TACs, will liaise and support the PIU.

The monitoring system will:

- Provide timely information about the implementation of the RAP
- Report any grievances that require resolution; and document timely completion of the Project resettlement obligations for all permanent and temporary losses, etc.

Given the exigency of making available the requisite quantitative and qualitative information/statistics for external monitoring, the report database will be continuously updated with respect to changes that occur on the ground as resettlement and compensation are being implemented. This will ensure factual, reliable and avoidance of under reporting on all aspects of the project activities and also keep the project abreast with changing realities.

It is important that feedback is provided to the various stakeholders and agencies involved in the process so that identified problems can be resolved and avoided for the remainder of the resettlement process. Specifically, the Safeguards Specialists at the PIU will prepare monthly reports on progress (especially in the compensation of PAPs) and the level of participation of PAPs. These reports will be submitted to the Project Coordinator for transmission to the Project Steering Committee (PSC) and/or NAWEC. The PIU will compile the monthly reports to make an integrated resettlement report in the annual monitoring and evaluation report to NAWEC's management and Board, and the World Bank.

### **8.2 Evaluation**

Whereas monitoring of the resettlement process is normally the responsibility of the PIU, evaluation is normally undertaken by an external agency. The method associated with this monitoring is to get both objective information and PAP perception. This is to determine whether the process and RAP has been properly designed and executed. The following are the objectives of the evaluation:

- General assessment of the compliance of the implementation of the RAP with the general objectives and methods as set in the RPF document
- Assessment of the compliance of the implementation of the RAP with the relevant laws, regulations, and safeguard policies
- Assessment of the consultative procedures that took place at individual and community levels, together with the Government and Local Government levels
- Assessment of fair, adequate, and prompt compensation as they have been implemented and access to a functioning grievance mechanism; and,
- Identification of actions, as part of the on-going monitoring, to improve the positive impacts of the project and mitigate its possible negative impacts, if any.

It is expected that there will be a mid-term review as well as final evaluation. The latter should preferably take place after all RAP activities have been completed including development initiatives, but before the financial commitments to the project are finished. This will allow the flexibility to undertake any corrective action that the auditors may recommend before the Project is completed.

The findings of the evaluation may be presented at a validation workshop to be attended by representatives of the PAPs, who would be asked to give: (i) their assessment of the resettlement process; (ii) the effects that this has had on their livelihoods; and (iii) suggestions as to first, what residual impacts they are still having to contend with, and second, what changes should be made for future projects.

### **8.3 Indicators for monitoring and evaluation**

#### **8.3.1 Monitoring indicators**

The monitoring indicators can be summarized as follows:

- Number of acquisition notices/agreements signed between NAWEC and PAPs, or delivered and those outstanding
- Number of PAPs who have left the project site by type, including owners who have lost land, trees, or structures
- Number, type, and value of cash compensation payments made
- Number and type of grievance redress applications, type of grievance made, and manner of resolution
- Issues brought to the notice of the PIU handling the resettlement process by PAPs, and the mode of settlement used.

#### **8.3.2 Evaluation indicators**

The evaluation indicators are summarized below:

Number of PAPs, number of stakeholder engagements conducted and duration (gender disaggregated)

- Compensation disbursed by type/ category of PAP
- % Or number of grievances received, number resolved, and number left unresolved and why
- Average time for the resolution of complaints
- % Or number of potential adverse impacts identified, number resolved
- % Or number of PAPs compensated and % or number that have regained their incomes and livelihood activities.

## CHAPTER 9: RAP FORMULATION AND IMPLEMENTATION SCHEDULE

### 9.1 Formulation and implementation schedule

Table 9.1 presents the RAP’s implementation schedule; this includes the duration and timing of the key milestones and tasks and covers the period from the preparation of the RAP through the payment of compensations to the PAPs, to the final independent monitoring and evaluation exercise.

It will be emphasized that the RAP implementation must be completed, and PAPs adequately compensated before any civil work can commence.

**Table 9.1: RAP Formulation and implementation schedule**

Activities/Tasks	Weeks											
	1	2	3	4	5	6	7	8	9	10	11	12
Cut-off-date	29 <sup>th</sup> December 2024											
Preparation of RAP	■	■	■	■								
Review and approval by WB					■	■	■	■				
Disclosure of RAP to PAPs								■	■			
Disclosure on Bank’s Website									■			
RAP implementation										■	■	■
Internal Monitoring										■	■	■
Independent Evaluation										■	■	■

### 9.2 Procedure in payment of compensation

It is recommended that a consultant be recruited to support NAWEC to implement this RAP; the Consultant will be supported by the PIU and NAWEC Planning staff and the Social Risk Management Specialist.

Once the RAP is approved by the Bank, the Consultant will be responsible for the day-to-day management of the resettlement plan which will include liaising with the PAPs, Government agencies and other service providers to ensure compensation and other forms of assistance are provided to PAPs in a timely manner.

Given the relatively small amounts of money due to the individual PAPs, it is recommended that rather than the PAPs be paid by checks (some of the amounts are too small for that), the Project should prepare a General Payment Voucher in which all the PAPs are listed by village. In this regard, the Project’s Financial Manager will travel to all the various corridors to pay the individual PAPs at their respective villages.

In view of the fact that many of the PAPs’ identification documents could not be obtained for one reason or another, the District Chief, village Alkalo, village elders, VDC Chairmen, or any community members of the respective villages will be present during the payment. They will help to verify that the right persons are being paid, especially in the case where the PAP does not provide sufficient documentary proof to indicate that he is indeed the right person.

Given the large number of PAPs in the affected communities without national ID cards for various reasons, and the limited time available for the implementation of project activities, it will not be feasible to provide the required support to them to acquire the relevant national documents. To do

this will require huge logistical arrangements given that many of the communities are located in very remote areas, far from the centers where the PAPs can acquire the relevant documents.

## CHAPTER 10: BUDGET AND FUNDING ARRANGEMENT

The estimated budget for the RAP's implementation is indicated in Table 10.1. The funds will be provided from the resources of the GOTG's counterpart fund, and all the payments will comply with the relevant Gambian legislation and the Banks' requirements. The funds for the payment of the PAPs will be disbursed as discussed in Section 9.2 above; for payments to other beneficiaries such as the Consultants who will support the PIU, members of GRCs, etc., payment can be made by direct transfer to bank accounts of the respective beneficiaries, or other appropriate means.

Internal monitoring of RAP implementation will be the responsibility of the PIU, and this will be part of the normal daily activities of the Safeguards Specialists who will be supported by a small budget for mainly telephone calls. Other costs such as daily subsistence allowances to the project sites will be paid from the PIU's usual budget for such expenditures.

The grand total for the RAP's implementation, including compensation of PAPs, and its monitoring and evaluation is **D5,600,003.00** (five million six hundred and thousand two and three Dalasi) as indicated in Table below which is equivalent to **US\$ US\$ 83,961,40** (eighty-three thousand, nine hundred and sixty-one Dollars, and forty Cents).

The funds will be provided from the resources of both the Government of The Gambia and the World Bank and EIB, and all payments to PAPs will comply with the relevant Gambian legislation and the Banks' requirements.

GOTG will contribute **D1,058,403.00** (one million and fifty-eight thousand four hundred and three Dalasi), equivalent to **US\$ 16,036.40** (sixteen thousand and thirty-six Dollars and forty Cents), and IDA/World Bank/EIB will contribute **D 4,541,600.00**, (four million five hundred and forty-one thousand, six hundred Dalasi) equivalent to **U\$ 67,925.00** (sixty-seven thousand, nine hundred and twenty-five Dollars).

**Table 10.1: Budget for the implementation of the RAP**

No	Activity/Item	Total (D)		Total US \$	
		Source of Funding			
		GOTG	IDA/EIB	GOTG	IDA/EIB
<b>A</b>	<b>COMPENSATION TO PAPS</b>				
1	Compensation for loss of farmland	624,185.00		9,457.34	
2	Compensation for trimmed trees	82,000.00		1,242.42	
3	Assistance to vulnerable groups	156,000.00		2,363.63	
	<b>Subtotal</b>	<b>862,185.00</b>		<b>13,063.40</b>	
<b>B</b>	<b>RAP IMPLEMENTATION</b>				
4	Consultant to support PIU in RAP implementation	0	2,503,100.00	0	37,925.00
5	Allowance to support personnel and logistics including meetings of GRC members	60,000.00	0	909.00	0
6	Internal monitoring and evaluation of RAP implementation by PIU	50,000.00	0	757.75	0
	RAP implementation audit		2,038,500.00		30,000

7	Contingency (10% of compensation cost)	86,218.00	0	1,306.33	0
<b>Subtotal</b>		<b>196,218.00</b>	<b>4,541,600.00</b>	<b>2,973.08</b>	<b>67,925.00</b>
<b>Subtotal</b>		<b>1,058,403.00</b>	<b>4,541,600.00</b>	<b>16,036.40</b>	<b>67,925.00</b>
<b>Grand total</b>		<b>5,600,003.00</b>		<b>83,961,40</b>	

1 US Dollar = D66.00

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**APPENDICES**
**Appendix 3.1: Summary of comments and views expressed during the consultations**

Date	Communities/Venues	Comments/views	Introduction and objectives of GERM Phase III
14.12 – 29.12.23	Consultant's remarks		<p>The lead Consultant introduced the team, including the NAWEC expert who was part of the field exercises.</p> <p>The Consultant shared information on matters surrounding the visit and the consultations with the communities; project background, processes, and procedures as well as the role of the communities and institutions during the development and implementation of the RAP.</p> <p>The communities were informed that the Project is IDA/World Bank/GOTG/EIB/EU funded meant to improve the power generation capacity and efficiency of NAWEC's transmission network to increase access to electricity throughout the country.</p>

		<p>The Consultant further informed the meetings that the proposed infrastructure (including the poles and lines) will pass through communities, along feeder roads, through farmlands, bushes/shrubs, etc.</p> <p>The meetings were informed that as part of the assessment, the routing of the lines will be collectively done with the NAWEC team, and the objective is to avoid or minimize environmental and social impacts as much as possible.</p> <p>Given that the ESIA for this sub project indicated that farmlands, and possibly other private assets such as fruit trees will be impacted, consequently it recommended development of a RAP which is supposed to address the issue of compensation to the owners of the impacted farmlands, and fruit trees.</p> <p><b>Rationale of the public consultations</b></p>
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		<p>The Consultant informed the meetings that the rationale for the public consultations is for information sharing with Project beneficiaries; to seek their opinion, and eventually develop the RAP report.</p> <p>Another important reason for the consultations is to inform PAPs about the GERMP GRM the main objective of which is to provide a functional and easily accessible mechanism to address complaints and grievances arising out of project activities.</p> <p>The creation of Regional GRCs was highlighted for this purpose.</p>
<b>Date</b>	<b>Location/venue</b>	<b>Comments/Views by communities</b>
<b>16.12.23</b>	<b>Sahuma Kunda – Sami District – CRR-North</b>	<p>Welcome to my community, and we deeply appreciate the electrification project. We have been long yearning for electricity for decades, and this is the most wonderful message reaching us this year.</p> <p>Are we to contribute towards</p>

		<p>the project, as this could be a challenge to us due to our financial status?</p> <p><i>Answer: No, you do not have to contribute to bring the facilities close to your house, the Government will do that. However, you will have to purchase your own cash power meter at a reduced cost, but you will be responsible for your daily cash power purchases</i></p>
<b>16.12.23</b>	<b>Tabanani – Sami District – CRR-North</b>	
	Amat Conteh	This is indeed a welcome development; we can even forgo the compensation. This is such small area, NAWEC is free to take the space without compensation.
<b>17.12.23</b>	<b>Raneru Fula – Sami District – CRR - North</b>	
	Njobo Bah	<p>Can we continue to farm under the lines?</p> <p><i>Answer: Yes, you can farm under the lines. The only area you will lose is the area occupied by the pole.</i></p>
<b>19.2.23</b>	<b>Misira – Upper Fulladu District – CRR-South</b>	
	Fanta Fatty	We assure the consultant of the community's cooperation and support during project implementation.

		<p>The overall benefit of the project outweighs any loss of land or its related compensation, or any other impact that comes with the project.</p> <p>Are you going to cut down out mango trees?</p> <p><i>Answer: No, only the branches that are in the way of the lines will be trimmed.</i></p>
<b>19.12.23</b>	<b>Mabali Koto – Upper Fulladu District - CRR-South</b>	
	Saja Ceesay	<p>When will the lines be constructed?</p> <p><i>Answer: NAWEC is constructing the poles in the communities that were compensated earlier, and as soon as those communities have been completed it will be your turn. Maybe before the next rains.</i></p>
<b>21.12.23</b>	<b>Sare Yero Yoba – Upper Fulladu District - CRR-South</b>	
	Demba Baldeh – Alkalo	<p>I hope the compensation will be sufficient to help us.</p> <p><i>Answer: The area that will be lost to the pole is very small, and as we indicated, it is not more than 4m<sup>2</sup> per pole. In this case the compensation will not be very large.</i></p>

<b>22.12.23</b>	<b>Sare Mansong – Upper Fulladu District - CRR-South</b>	
	Bubacar Kandeh	We welcome this development in the district. There are so many challenges that we face here without electricity.
	Jindeh Camara	With electricity, we can also watch television in the evenings after farm work and this will help us know what is happening in our country and beyond.
	Abdoulie Baldeh	Traders within the region will take advantage of our plight and offer very poor prices for the crops we produce here, and this is not advancing our income status.  The women walk long distances to market centers almost daily to buy the necessary ingredients for our meals and this is expensive and time wasting. With the availability of electricity precious time will not be lost travelling to market centers to acquire the same food ingredients.
<b>27.12.23</b>	<b>Nyankui – Sandu District – URR-North</b>	
	Alhaji Jawla – Alkalo	We welcome this initiative from NAWEC. The amount of land required by the project is insignificant. We do

		not have any problems with the land required
<b>27.12.23</b>	<b>Nawdeh – Sandu District - URR-North</b>	
	Musa Jawo	Any amount and type of assistance to us will be welcomed because at this time of year in our community there is hardly any economic activity that we engage in. there is now water for vegetable gardening, and all we depend on is the money from our groundnut crops.
<b>27.12.23</b>	<b>Njie Kunda – Sandu District – URR- North</b>	
	Basiru Njie	<p>We thank NAWEC for the electricity.</p> <p>When do we expect to have the electricity?</p> <p><i>Answer: As soon as work in other areas are completed, the Contractors will arrive in your area to begin work. We hope this will be before the next rainy season.</i></p>
<b>28.12.23</b>	<b>Demba Wandu – Sandu District – URR -North</b>	
	Boye Danjo	<p>Electricity brings lot of economic and health benefits as well as improved leaving standards</p> <p>This is an opportunity for us farmers with the support of Government, to improve on our</p>

		produce and also our income
<b>CONSULTATIONS WITH NATIONAL INSTITUTIONS</b>		
<b>7.2.24</b>	<b>NATIONAL ENVIRONMENT AGENCY- KANIFING</b>	
	Lamin Samateh – Senior Programme Officer -EIA	<p>The RAP should ensure that all PAPs are compensated for their lost assets</p> <p>NAWEC must put serious consideration on health and safety issues</p> <p>NAWEC should work with the Departments of Lands and Physical Planning to ensure that no PAP (who is already compensated) erects tall structures (such as storey buildings) along the line trajectory along the corridor</p>
<b>15. 2.24</b>	<b>CRR TAC MEETING – OFFICE OF THE GOVERNOR- JANJANBUREH</b>	
	Mr. Sainey Mbye – Deputy Governor - CRR	<p>I took part in settling the dispute between a female PAP and NAWEC contractors in Sami Tenda last year. The woman insisted on continuing selling food at her usual business site near the bridge even after she was compensated.</p> <p><i>Answer: The woman had every right to continue at the site because her compensation was based on the impact type i.e. “temporary loss of daily earnings”. She was compensated for lost earnings during line construction, and after the stringing, she could go back to resume work at her usual place of business. The contractors had no right to stop her.</i></p>
	Mr. Momodou Lamin Baldeh – Seyfo - Upper Fulladu West – Regional GRC member	We did not have this type of information during the process. We need to be sensitized on RAP issues
<b>11.3.24</b>	<b>NATIONAL ROADS AUTHORITY- BIJILO</b>	
	Ousman Sanyang – Managing Director	In one of the districts impacted by the project (in Sami District

		<p>in CRR North), new road construction has actually started, and new roads are being planned for Upper Fulladu and Sandu Districts as well.</p> <p>Road reserves have been identified for most roads, the width of which depends on the road classifications.</p> <p>NRA has created a multi-sectoral Road Reserve Committee whose membership includes NAWEC,</p> <p>The road constructions earmarked in the project areas are already planned as Feeder (rural) roads and therefore the appropriate road reserves should be 15m -20m on either side of the road.</p>
	George Jatta – Technical Director	<p>Many roads in the Gambia run along road corridors, but poles should be erected on the road reserve, not too close to the road itself; they must be at least 10 meters from the shoulder of the road.</p>
11.3.24	<b>MINISTRY OF LANDS AND REGIONAL GOVERNMENTS – BANJUL</b>	
	Mamudou Manjang - Deputy Permanent Secretary – Technical	<p>After being briefed about the GERMP Even though the degree of impact on any PAP’s land will be very small, the PAPs must be compensated before the commencement of the project.</p> <p>He also urged that the Department of Lands and survey should be contacted by NAWEC for support if any issues of valuations are encountered.</p>
	<b>DEPARTMENT OF FORESTRY- BANJUL</b>	
13.3.24	Muhamed Jaiteh - Director	<p>I urge the project to pay particular attention to the protection of forest trees; the districts in which the project</p>

		will be implemented have a number of community forests, as well as gazetted forests, containing a lot of forest.
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**Appendix 3.2: Attendance registers of community meetings**

**FALADU – CORRIDOR 1**

**MABALI KOTO**

**MISIRA**

**FULADU CORRIDOR 2**

**ROAD CORRIDOR**

**FALADU – CORRIDOR 3**

**SARE GIDEH**

**FULADU CORRIDOR 3**

**MANNEH KUNDA**

**FALADU – CORRIDOR 4**

**SANKABARY (NJOREN)**

**FALADU – CORRIDOR 5**

**SARE MODOU**

**FULADU CORRIDOR 5**

**TAMBA KUNDA**

**FULADU CORRIDOR 5**

**SARE KALLY**

**FULADU CORRIDOR 5**

**SARE YERO GULLORY**

**FULADU CORRIDOR 5**

**SARE PATEH EBADAN**

**FULADU CORRIDOR 5**

**SARE SILERI**

**FULADU CORRIDOR 5**

**BANI**

**FULADU CORRIDOR 5**

**FALADU SUKUTA**

**FULADU CORRIDOR 5**

**SARE MANSONG**

**FULADU CORRIDOR 5**

**SINCHU CHEDOYEL**

**FULADU CORRIDOR 5**

**NYAMENG KUNDA**

**FULADU CORRIDOR 5**

**SAMBA TAKO**

**FULADU CORRIDOR 6**

**SANTANTO MUNDONG**

**FULADU CORRIDOR 6**

**SANTANTO SAMBA DEMO (JABEL)**

**FULADU CORRIDOR 6**

**NDORNA**

**FULADU CORRIDOR 6**

**LOGOMEL**

**FULADU CORRIDOR 6**

**CHA KUNDA**

**FULADU CORRIDOR 6**

**SINCHANG FARAMBA**

**FULADU CORRIDOR 6**

**SARE SOFIE**

**FULADU CORRIDOR 6**

**SARE JARJEH**

**FULADU CORRIDOR 6**

**SAMBOIDO**

**FULADU CORRIDOR 6**

**SARE ALI**

**SANDU – CORRIDOR 2**

**NJIEBEH**

**SANDU - CORRIDOR 3**

**SARE JALLOW**

**SANDU CORRIDOR 2**

**NYANKUI**

**SAMI – CORRIDOR 1**

**FITU FULLA**

**SAMI - CORRIDOR 3**

**SAHUMA KUNDA**

**SAMI CORRIDOR 3**

**CHANGAI WOLLOF**

**SAMI – CORRIDOR 3**

**TABAYEL**

**SAMI – CORRIDOR 4**

**NJALAL TORO**

**SAMI – CORRIDOR 6**

**MADIANA**

**SAMI CORRIDOR 6**

**FORRI**

**SANDU CORRIDOR 3**

**WELLINGARA SUSSO**

**SANDU CORRIDOR 3**

**SANKIBAI**

**FULADU CORRIDOR 5**

**SARE CHEWTO**

**FULADU CORRIDOR 5**

**SERE YERO YOBA**

**FULADU CORRIDOR 5**

**SAMBUNDIYA**

**FULADU CORRIDOR 6**

**JAMWELLY**

**SANDU CORRIDOR 3**

**NAWDEH**

**FULADU CORRIDOR 6**

**SARE YEROYEL**

**FULADU CORRIDOR 6**  
**SARE PATEH KASSAMA**

**SANDU CORRIDOR 2  
DASILAME SECKA**

**SANDU CORRIDOR 2**

**SARE KALI**

**SANDU CORRIDOR 2**

**NAWDEH TENDA**

**FULADU CORRIDOR 6**

**SARE NGALLEN**

**FULADU CORRIDOR 6**

**SARE SAWADI**

**FULADU CORRIDOR 6**

**SARE SABO**

**FULADU CORRIDOR 7**

**CHARJEL**

**FULADU CORRIDOR 7**

**SARE GAI**

**SAMI CORRIDOR 1**

**KUJEW FULA**

**SAMI CORRIDOR 1**

**KUJEW MANDINKA**

**SAMI CORRIDOE 2**

**DARU SALAM**

**SAMI CORRIDOR 3**

**MBAFAF**

**SAMI CORRIDOR 3**

**RANEROU WOLLOF**

**SAMI CORRIDOR 3**

**RANEROU FULA**

**SAMI CORRIDOR 4**

**NJALAL FULA**

**SANDU CORRIDOR 1**

**DEMBA WANDU**

**SANDU CORRIDOR 1**

**MAMADY CEESAY**

**Appendix 3.3: Summary of attendance registers - community consultations**

No	Community	Gender		Total
		M	F	
<b>FULLADU – CORRIDOR 1</b>				
1	Mabali Koto	6	0	<b>6</b>
2	Misira	8	2	<b>10</b>
<b>Subtotal</b>	<b>= 2</b>	<b>14</b>	<b>2</b>	<b>16</b>
<b>FULLADU – CORRIDOR 3</b>				
1	Sare Gideh	4	0	<b>4</b>
2	Manneh Kunda	5	0	<b>5</b>
<b>Subtotal</b>	<b>= 2</b>	<b>9</b>	<b>0</b>	<b>9</b>
<b>FULLADU – CORRIDOR 4</b>				
1	Sankabary (Njoren)	4	0	<b>4</b>
<b>Subtotal</b>	<b>= 1</b>	<b>4</b>	<b>0</b>	<b>4</b>
<b>FULLADU – CORRIDOR 5</b>				
1	Sare Modou	4	0	4
2	Tamba Kunda	3	3	6
3	Sare Kally	6	3	9
4	Sare Yero Gullory	17	0	17
5	Sare Pateh Ebadan	8	0	8
6	Sare Sileri	3	0	3
7	Bani	2	6	8
8	Sukuta	5	6	11
9	Sare Manson	8	1	9
10	Sinchu Chedoyel	15	0	15
11	Nyameng Kunda	13	0	13
12	Samba Tako	7	1	8
13	Sare Chewto	5	3	8
14	Sere Yero Yoba	3	3	6
15	Sambundiya	3	3	6
<b>Subtotal</b>	<b>= 15</b>	<b>102</b>	<b>29</b>	<b>131</b>
<b>FULLADU – CORRIDOR 6</b>				
1	Santanto Mundong	4	0	4
2	Santanto Samba Demo (Jabel)	0	6	6
3	Ndorna	5	0	5
4	Logomel	5	0	5
5	Cha Kunda	9	0	9
6	Sinchang Faramba	6	1	7
7	Sare Sofie	6	2	8
8	Sare Jarjeh	5	0	5
9	Samboido	8	0	8
10	Sare Ali	7	0	7
11	Sare Yeroyel	2	4	6
12	Sare Pateh Kassama	5	4	9
13	Sare Ngallen	5	4	9
14	Sare Sawadi	3	2	5
15	Sare Sabo	5	0	5
<b>Subtotal</b>	<b>= 15</b>	<b>75</b>	<b>23</b>	<b>98</b>

<b>FULLADU CORRIDOR 7</b>				
1	Charjel	5	0	5
2	Sare Gai	2	5	7
<b>Subtotal</b>	<b>= 2</b>	<b>7</b>	<b>5</b>	<b>12</b>
<b>SAMI – CORRIDOR 1</b>				
1	Fitu Fulla	13	0	13
2	Sahuma Kunda	1	3	4
3	Changai Wollof	4	1	5
4	Tabayel	3	4	7
5	Kujew Fula	4	3	7
6	Kujew Mandinka	2	2	4
<b>Subtotal</b>	<b>= 6</b>	<b>27</b>	<b>13</b>	<b>40</b>
<b>SAMI CORRIDOR 3</b>				
1	Ranerou Wollof	8	2	10
2	Ranerou Fula	6	6	14
<b>Subtotal</b>	<b>= 2</b>	<b>14</b>	<b>8</b>	<b>24</b>
<b>SAMI – CORRIDOR 4</b>				
1	Njalal Toro	12	0	12
<b>Subtotal</b>	<b>= 1</b>	<b>12</b>	<b>0</b>	<b>12</b>
<b>SAMI – CORRIDOR 6</b>				
1	Madiana	6	0	
2	Forri	11	2	
3	Njalal Fula	1	4	
<b>Subtotal</b>	<b>= 3</b>	<b>18</b>	<b>6</b>	<b>24</b>
<b>SANDU – CORRIDOR 1</b>				
1	Demba Wandu	4	2	6
2	Mamady Ceesay	8	3	11
<b>Subtotal</b>	<b>= 2</b>	<b>12</b>	<b>5</b>	<b>17</b>
<b>SANDU – CORRIDOR 2</b>				
1	Njiebeh	8	0	
2	Sare Jallow	6	1	
3	Nyankui	9	0	
4	Jamwelly	6	0	
5	Dasilame Secka	1	2	
6	Sare Kali	2	2	
7	Nawdeh Tenda	4	3	
8	Daru Salam	2	4	
<b>Subtotal</b>	<b>= 8</b>	<b>38</b>	<b>12</b>	<b>50</b>
<b>SANDU CORRIDOR 3</b>				
1	Wellingara Susso	4	3	7
2	Sankibai	7	2	9
3	Nawdeh	3	0	3
4	Mbafaf	6	0	6
<b>Subtotal</b>	<b>= 4</b>	<b>20</b>	<b>5</b>	<b>25</b>
<b>Grand total</b>	<b>= 63</b>	<b>352</b>	<b>108</b>	<b>462</b>

### Appendix 3.4: Summary of views and concerns raised by national institutions

In addition to PAPs and other community stakeholders, formal consultations with government institutions were conducted; these included the National Roads Authority (NRA), the Ministry of Lands and Regional Government (MOLRG), the Department of Forestry (DOF) and the National Environment Agency (NEA), to inform them of the Project and find out what concerns they may have in its implementation. Summaries of the various meetings held as well as institutions and officials met are as follows:

#### i. National Roads Authority

The consultation meeting with the National Roads Authority (NRA) was held at its headquarters in Bijilo on Monday 11<sup>th</sup> March 2024 and was attended by:

- i) Mr. Managing Director.
- ii) Mr. – Technical Director.

The Managing Director confirmed that in one of the districts impacted the project (in Sami District in CRR North), new road construction has actually started, and added that new roads are being planned for Upper Fulladu and Sandu Districts, but these have not yet started.

Regarding the issue of MV poles, the Technical Director indicated that many roads in The Gambia run along road corridors but advised that such poles should be erected on the road reserve but not too close to the road itself (at least 10 meters from the shoulder of the road).

He further explained that road reserves have been identified for most roads, the width of which depends on the road classifications. He confirmed that NRA has created a multi-sectoral Road Reserve Committee whose membership includes all stakeholders responsible for the development and management of all roadside infrastructure and utilities, including NAWEC. He therefore confirmed that the road constructions earmarked in the project areas are already planned as Feeder (rural) roads and therefore the appropriate road reserves should be 15m -20m on either side of the road. He finally confirmed that construction of the road from Ranerou Woloff to Sama Kunda in the Sami District has already started with a road reserve of 20 meters.

#### ii. Ministry of Lands and Regional Governments

The Ministry of Lands and Regional Governments (MOLRG) was met on Monday 11<sup>th</sup> March 2024, represented by the Deputy Permanent Secretary (DPS-Technical).

After being briefed about the GERMP Backbone Phase III Project and the RAP being developed for it, the DPS (T) advised that even though the amount of impact on any PAP's land will be very small, the PAP must be adequately compensated before the commencement of the project. He also urged that the Department of Lands and Surveys should be contacted by NAWEC for support if any issues of valuations are encountered.

Mr. Manjang also said that the Ministry is not only the Agency responsible for the implementation of the Land Acquisition and Compensation Act (LACA), as well as the other land-related Acts, but it is also a member of the Project Steering Committee of the GERMP Project. He added that the Ministry also sits on the Project's GRC. In this regard, he called for more collaboration between NAWEC and his Ministry to avoid some of the problems encountered during the implementation of the GERMP 225kV transmission line in the Greater Banjul Area (GBA).

### iii. Department of Forestry

The consultation with the Department of Forestry (DOF) was held on Wednesday 13<sup>th</sup> March 2024 with the Director. Mr. Jaiteh started by urging the project to pay particular attention to the protection of forest trees. He also stated that the *districts in which the project will be implemented have a number of community forests, as well as gazetted forests, containing a lot of forest trees such as the Eucalyptus. He therefore urged that a copy of the proposed line corridors be made available to his department to give additional advice on possible impact of the project on these forest reserves.*

*The Director confirms that a memorandum of Understanding (MOU) has been signed with NAWEC which, if properly implemented, will adequately address most impending negative impacts of the project on forest trees. He however raised concern on the implementation of the MOU and relationship of NAWEC with his Department as follows:*

- i) The Salagy Substation: On submission of a restoration Plan, only 60% of the cost was paid resulting in 40% of the restoration Plan not implemented. The Department also wanted water supply but NAWEC would not support the Department resulting in drilling a borehole;
- ii) The Jambur Solar Plant: A restoration Plan was submitted but no response was received from NAWEC;
- iii) The Nyambai Forest Park: Space was made available to NAWEC for a borehole whilst the forestry office in the Nyambai forest does not have electricity. When NAWEC was contacted for connection, the Department was charged over one million Dalasi for the Forestry office to be connected.

### iv. National Environment Agency

This consultation was held by telephone with the Senior Program Officer at the National Environment Agency (NEA) Mr. Samateh on the 7<sup>th</sup> February 2024. During the meeting, he was informed that NAWEC is in the process of implementing the GERMP Phase III and includes the development of a RAP for the communities that will be impacted by the project. The process should therefore include consultations with all relevant stakeholders of which the NEA is key.

In response, Mr. Samateh informed the consultants that NEA has not yet received the ESIA Report for this Project which should inform this RAP. In this regard, Mr. Samateh said the required due process was not followed as a result of which a scoping was not conducted by the Agency. When informed that the NAWEC PIU had made available a copy of a draft ESIA Report to the consultant, Mr. Samateh said that in this case the RAP should proceed.







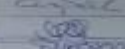
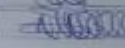



He also highlighted that the RAP should ensure that all impacted PAPs are compensated for their lost assets, and that these impacts should include land lost to the project, physical structures such as houses, fences, etc.

With regards to health and safety concerns, Mr. Samateh said that NAWEC should put serious consideration on this issue. In particular, he suggests that NAWEC should work with the Departments of Lands and Physical Planning to ensure that no PAP (who is already compensated) should in future erect tall structures (such as multi-level buildings) along the line trajectory.

**Appendix 3.5: List of persons met at the national institutions**

No.	Name	Institution/Sector	Designation
<b>Key stakeholders</b>			
1	Lamin B. S. Samateh	NEA	SPO, EIA
2	Ousman Sanyang	NRA	Managing Director
3	George Jatta	NRA	Technical Director
4	Mamudou Manjang	MOLRG	Deputy Permanent Secretary – Technical
5	Muhamed Jaiteh	Department of Forestry	Director

**Appendix 3.6: List of attendees at the CRR TAC meeting in Janjangbureh**

NO	NAME	ORGANIZATION	PHONE NO	PHONE NO	PHOTO
1	Agustinus Sidi	OLDO	0852 45111	7090572	
2	Head Security	1-		396097	
3	Lamin Sidi	1-2		3467244	
4	Head of Project	1-3		2962847	
5	Lamin Sidi	1-4		396097	
6	Head of Project	1-5		2558704	
7	Muhammad Sidi	1-6		3035174	
8	Alfa Sidi	1-7		3356158	
9	Sani Sidi	1-8		3452068	
10	Minister of Regional	Regional Office		9771272	
11	Chief of Police	Police Officer		5182359	

**Appendix 4.1: List of villages affected by the project**

No	Communities	Region/District	Population			# of Households
			CRR-N – Sami	Total	Male	
1	Kujew Fula	CRR	30	18	12	6
2	Kejew Mandinka	CRR	216	94	122	10
3	Konko Duma	CRR	61	34	27	5
4	Daru Salam	CRR	58	26	32	6
5	Njalal Fula	CRR	59	28	31	8
6	Ranerou Fula	CRR	269	138	131	26
7	Njallal Toro	CRR	435	196	239	50
8	Ranerou Wollof	CRR	726	351	375	74
9	Tabanani	CRR	471	233	238	54
10	Chamen	CRR	88	30	58	10
11	Tabeyel	CRR	55	32	23	9
12	Mbafaf	CRR	124	58	66	11
13	Sama kunda	CRR	848	384	464	64
14	Forie	CRR	218	112	106	20
15	Madiana	CRR	464	219	245	44
16	Changai Woloff	CRR	463	227	236	40
17	Sami Tenda	CRR	85	47	38	12
18	Fitu Fula	CRR	258	126	132	21
<b>Subtotal</b>			<b>4928</b>	<b>2353</b>	<b>2575</b>	<b>470</b>
1	Sambundinya	<b>CRR-S-U. Fulladu</b>	83	42	41	4
2	Sareduta (Duta Wally)	CRR	119	48	71	9
3	Sinchang Gelanjo	CRR	56	18	38	3
4	Sare Yeroyel	CRR	69	38	31	8
5	Jamwelly	CRR	64	32	32	6
6	Logomel***	CRR	-	-	-	-
7	Santanto Jabel	CRR	215	107	108	34
8	Ndorna	CRR	181	79	102	11
9	Santanto Ousman	CRR	82	43	39	8
10	Sare Dembaru	CRR	103	49	54	11
11	Sare Pateh Jawo	CRR	150	78	72	15
12	Belal Fass	CRR	214	103	111	23
13	Sare Giddeh	CRR	278	158	120	34
14	Santanto Budu	CRR	369	188	181	59
15	Sambuya	CRR	135	66	69	11
16	Sinchang Faramba	CRR	214	89	125	20
17	Bani	CRR	60	27	33	10
18	Samba Tacko (Ndikiri Kunda)	CRR	713	373	340	56
19	Nyameng Kunda	CRR	352	161	191	33
20	Librass	CRR	695	377	318	44
21	Kerewan Dumbokono	CRR	405	200	205	38
22	Sinchu Chedoyel	CRR	265	129	136	26
23	Fulladu Sukuta	CRR	317	134	183	35
24	Sare Sillereh	CRR	357	179	178	26
25	Sinchu Samba Jawo	CRR	204	96	108	16

26	Chargel	CRR	495	237	258	79
27	Sare Sabo	CRR				
28	Sare Ali	CRR				
29	Sare Sawadi	CRR	223	112	111	19
30	Sare Ngalleh	CRR	232	117	115	18
31	Sare Jajeh	CRR	99	38	61	9
32	Sare Soffie	CRR	498	239	259	65
33	Sare Gai	CRR	252	97	155	18
34	Cha Kunda	CRR	849	393	456	60
35	Santanto Wurma	CRR	484	247	237	34
36	Santanto Mundo	CRR	400	180	220	38
37	Daru	CRR	505	247	258	41
38	Sankabary	CRR	156	74	82	23
39	Tandi	CRR	250	118	132	29
40	Abea Kuta	CRR	209	102	107	18
41	Sare Tamanso	CRR	100	47	53	21
42	Sare Chewto	CRR	381	184	197	36
43	Sare Yerro Yoba	CRR	148	76	72	10
44	Charen	CRR	265	128	137	29
45	Njoben Karim	CRR	217	120	97	31
46	Sare Yero Gullory	CRR	389	204	185	38
47	Sare Modou	CRR	59	24	35	4
48	Manneh Kunda	CRR	307	146	161	30
49	Njoren	CRR	426	181	245	38
50	Sare Debbo	CRR	335	178	157	29
51	Mabally Kuta	CRR	542	263	279	46
52	Mabally Koto	CRR	374	182	192	28
53	Misira	CRR	431	191	240	41
54	Sare Gibel	CRR	215	107	108	34
55	Sare Bakary	CRR	210	100	110	24
56	Sare Kally	CRR	94	46	48	8
57	Sare Pateh Ebandan	CRR	104	44	60	9
58	Sare Mansong	CRR	85	46	39	10
59	Sinchang Samba Mberry	CRR	109	51	58	9
60	Sare Demba Sowe	CRR	30	14	16	6
61	Sare Pateh Kassama	CRR	122	70	52	15
62	Sare Samboido	CRR	105	55	50	14
<b>Subtotal</b>			<b>15400</b>	<b>7472</b>	<b>7928</b>	<b>1501</b>
1	Demba Nwandu	<b>URR-N-Sandu</b>	161	84	77	19
2	Mamadi ceesay	URR	424	221	203	38
3	Sare Ngai	URR	201	102	99	28
4	Dasilami Secka	URR				
5	Sare Kali ***	URR				
6	Nawdeh Tenda	URR	54	27	27	11
7	Njiebeh	URR	325	156	169	19
8	Nyankui	URR	665	343	322	61
9	Jakari/Njakajari	URR	743	262	381	29
10	Sare Jallow/Sare Malang	URR	298	147	151	28

11	Sankibai	URR	162	74	88	25
12	Wellingara Suso/Sare Batch	URR	100	47	53	10
<b>Subtotal</b>			<b>3133</b>	<b>1563</b>	<b>1570</b>	<b>268</b>
1	Sare Bojo	URR-South	1602	788	814	136
<b>Subtotal</b>			<b>1602</b>	<b>788</b>	<b>814</b>	<b>136</b>
1	Soma	<b>LRR-Jarra West</b>	12672	6,101	6571	2252
2	Misira		806	370	436	42
<b>Subtotal</b>			<b>13478</b>	<b>6,471</b>	<b>7007</b>	<b>2294</b>
1	Toniataba	<b>LRR-Kiang East</b>	806	370	436	166
2	Sey Kunda		1047	472	575	116
<b>Subtotal</b>			<b>1853</b>	<b>842</b>	<b>1011</b>	<b>282</b>
1	Kerewan	<b>NBR-Lower Badibu</b>	4570	2174	2396	676
2	Suwareh Kunda		1264	541	723	140
<b>Subtotal</b>			<b>5834</b>	<b>2715</b>	<b>3119</b>	<b>816</b>
<b>Grand Total</b>			<b>45422</b>	<b>21804</b>	<b>23618</b>	<b>5694</b>

Source: GBOS, 2019

\*\*\* Not seen in the Excel database

## Appendix 4.2: GERMP Backbone Phase III -Transmission line corridors

### CRR-S (Fuladu) Line corridors

Corridor 1: Bansang – Njoben Karim (Via Mabali koto and Misira, (Partially Road Corridor – (Mabalikuta, Sare Pateh Jawo and Njoben Karim))

Corridor 2: Bantanto – Manneh Kunda (Via Jibel) – Along Road Corridor

Corridor 3: Manneh Kunda – Sare Tamanso (Via Sare Giddeh, Charen and Belal Fass, Sare Debo) (Partially Road Corridor – (Charen, Belal Fass, Sare Debo and Sare Tamanso))

Corridor 4: Sare Tamanso –Njoben Karim (Via Sare Pateh Jawo)

Corridor 4A: Tamba Kunda – Njoren (Via Abeokuta Daru and Tandi) (Tamba Kunda – Abeokuta, Abeokuta – Daru and Daru – Tandi all are Road Corridors) – Njoren is also called Sankabari)

Corridor 5: Tamba Kunda – Sare Duta (Duta Wally) (Via Sare Modou, Sare Yorro Golori, Sare Pateh Ebadan, Sare Kali Kandeh, Sare Dembaru, Samba Tacko, Sare Chawto, Sare Yerro Yoba, Nyameng Kunda, Libras, Kerewan Dumbokono, Sincu Chedoyel, Sare Sileri, Kali Kunda, Sambundinya, Sare Mansong, Fuladu Sukuta, Sinchang Gelajo, Bani, and Sinchang Samba Mberry (Sinchu Samba))

Corridor 6: Santanto Bubu – Sinchu Samba Jawo (Via Santanto Mundong, Santanto Jabel, Santanto Ousman, Ndorma, Logomel, Santanto Wurumang, Cha Kunda, Jamwelly, Sinchang Faramba, Sare Soffie, Sare Jarje, Sare Samboido, Sare Yeroyel, Sare Pateh Gassama, Sare Ngallen, Sare Sawadi, Sare Ali and Sare Sabo)

Corridor 7: Sare Ali – Sare Gai (Via Charjel)

Corridor 8 Sambuya – Sare Bojo – (Via Sare Bakary) - Along Road Corridor

**Number of Corridors = 8**

### CRR-N (Sami) Line Corridors

Corridor 1: Fittu Fula – Kujew Mandinka – (Via Kujew Fula)

Corridor 2: Changai Wollof – Daru Salam

Corridor 3: Renerou Junction – Sama Kunda (Via Ranerou Woloff, Tabanani, Chamen, Tabayel and Mbafaf,) – (Partially a Road Corridor (Renerou Junction to Tabanani is a Road Corridor)

Corridor 4: Ranerou Woloff – Njalal Toro (Via Ranerou Fula)

Corridor 5: Njalal Fula Junction – Njalal Fula

Corridor 6: Sami Tenda – Madiana (Via Forry)

**Number of Corridors = 6**

**URR-N (Sandu) Corridors**

Corridor 1: Demba Wandu – Sare Ngai (Via Mamadi Ceesay)

Corridor 2: Dasilame Secka – Jakari (Via Sare Kali, Nawdeh Tenda, Njie Kunda and Nyankui)

Corridor 3: Nawdeh – Wellingara Sussoh (Via Sare Jallow and Sankibai)

**Number of Corridors = 3**

**LRR Line Corridors**

Corridor 1: Soma – Misira – Along road corridor

Corridor 2: Soma – Toniataba – Along road corridor

**Number of Corridors = 2**

**NBR Line Corridors**

Corridor 1: Kerewan – Suwareh Kunda – Along Road Corridor

**Number of Corridors = 1**

**Total Number of Corridors = 20**

**Appendix 5.1: Socioeconomic survey questionnaire – NAWEC Backbone Phase III**

**DATE**.....

**HOUSEHOLD NO:** .....

**NAME OF ENUMERATOR:** .....

**DISTRICT** .....

**REGION**.....

<b>Name of Household Member (Starting with Household Head-HH)</b>	<b>Sex 1.Male 2.Female</b>	<b>Age 00 if less than 1 year</b>	<b>Relation to HH</b>	<b>ID #</b>	<b>Type of Impact</b>	<b>Primary Occupation (7 years and above)</b>	<b>Highest Level of Education (3 years and above)</b>	<b>What kind of illness did you suffer from in the last one month</b>	<b>Vulnerabl e</b>	<b>Telephone</b>



**CODES**

**Illness Codes:** 1. None 2. Diarrhea: 3.HIV/AIDS: 4. Diabetes: 5. Hypertension: 6. Cancer: 7. respiratory disease: 9. Malaria 10. Stomachache: 11. Ear problems: 12. Eye problems 13. Tuberculosis: 14. Other (Specify).

**Relationship to the Household Head codes:** 1. Household Head: 2. Spouse: 3 Son: 4 Daughter: 5. Brother: 6. Sister: 7. Mother: 8. Father: 9. Other Relative (Please specify): 10. non-relative

**Impact Codes:** 1. Farmland: 2. Fruit trees: 3. Forest tress: 4: Fence: 5: House: 6. Welding workshop: 7. Carpentry workshop: 8. Tyre workshop: 9. Sheds at loumo: 10. Loss of earnings: 11. Meat shed: 12. Other (specify): 13. Not applicable

**Vulnerability Codes:** 1. Visually impaired: 2. Female-headed household: 3. Elderly man -70 years above: 4. Elderly woman - 65 years and above: 5. Hard of hearing: 6 Mental disability. 7. Physical disability 8: None

**Education Codes:** 1. Primary: 2. Secondary: 3. Tertiary: 4. Arabic: 5. None: 6: ECD/Nursery

**Occupation Codes:** 1. Farming/herding: 2. Housewife: 3. Tailor: 4. Student: 5. Carpenter: 6. Business: 7. None: 8. Driving: 9. Mason: 10. Civil servant: 11. Marabout: 12. Electrician: 13. Welder: 14. Other (Specify)

**Appendix 5.2: List of vulnerable persons**

No	Gender		Village	District	Vulnerability type	Amount (D)
	Male	Female				
1	X		Samba Tako	Upper Fuladu West	71 years	2,000.00
2	X		Sinchu Chedoyel	Upper Fuladu West	Visually Impaired	2,000.00
3	X		Sare Modou	Upper Fuladu West	Visually impaired	2,000.00
4	X		Sare Yorro Yoba	Upper Fuladu West	70 years	2,000.00
5	X		Sare Yorro Yoba	Upper Fuladu West	Epilepsy	2,000.00
6		X	Sare Yorro Yoba	Upper Fuladu West	65 years/visual	2,000.00
7	X		Sare Bakary	Upper Fuladu West	80 years	2,000.00
8		X	Sare Bakary	Upper Fuladu West	Visually impaired	2,000.00
9		X	Sare Pateh Ebadar	Upper Fuladu West	Visually impaired	2,000.00
10	X		Sare Pateh Ebadar	Upper Fuladu West	70 years	2,000.00
11	X		Kali Kunda	Upper Fuladu West	80 years	2,000.00
12		X	Kali Kunda	Upper Fuladu West	70 years	2,000.00
13		X	Sare Chewto	Upper Fuladu West	69 years/HH head	3,600.00
14	X		Sare Manson	Upper Fuladu West	88 years	2,000.00
15	X		Sare Mansong	Upper Fuladu West	72 years	2,000.00
16	X		Fuladu Keita	Upper Fuladu West	80 years	2,000.00
17	X		Yeroyel	Upper Fuladu West	79 years	2,000.00
18	X		Mabali Koto	Upper Fuladu West	80 years	2,000.00
19		X	Misira	Upper Fuladu West	70 years	2,000.00
20	X		Misira	Upper Fuladu West	Visually Impaired	2,000.00
21		X	Misira	Upper Fuladu West	Female HH head	3,600.00
22		X	Misira	Upper Fuladu West	Female HH head	3,600.00
23	X		Tandi	Upper Fuladu West	75 years	2,000.00
24	X		Sare Gideh	Upper Fuladu West	70 years	2,000.00
25	X		Sare Ali	Upper Fuladu West	70 years	2,000.00
26	X		Sare Ali	Upper Fuladu West	Visually impaired	2,000.00
27	X		Santanto Ousman	Upper Fuladu West	85 years	2,000.00
28		X	Santanto Ousman	Upper Fuladu West	85 years/visual	2,000.00
29	X		Santanto Ousman	Upper Fuladu West	70 years	2,000.00
30	X		Sare Sofie	Upper Fuladu West	70 years	2,000.00

31	X		Sare Sofie	Upper Fuladu West	76 years	2,000.00
32	X		Cha Kunda	Upper Fuladu West	78 years	2,000.00
33	X		Sinchan Faramba	Upper Fuladu West	80 years	2,000.00
34		X	Sinchan Faramba	Upper Fuladu West	65 years/visual	2,000.00
35	X		Ndoma	Upper Fuladu West	73 years	2,000.00
36		X	Sare Pateh Gassama	Upper Fuladu West	Visually impaired	2,000.00
37	X		Sare Mundong	Upper Fuladu West	Visually impaired	2,000.00
38		X	Sare Mundong	Upper Fuladu west	Visually impaired	2,000.00
39	X		Santanto Jabel	Upper Fuladu West	Visually impaired	2,000.00
40	X		Samboidou	Upper Fuladu west	Visually impaired	2,000.00
41		X	Sare Sawadi	Upper Fuladu west	2 years	2,000.00
<b>28</b>	<b>13</b>					
1	X		Chamen	Sami	75 years	2,000.00
2	X		Njalal Toro	Sami	70 years	2,000.00
3	X		Njalal Fula	Sami	87 years	2,000.00
4	X		Njalal Fula	Sami	74 years	2,000.00
5	X		Njalal Fula	Sami	77 years	2,000.00
6	X		KuJew Fula	Sami	Visually impaired	2,000.00
7	X		Chan Gai	Sami	80 years	2,000.00
8		X	Chan Gai	Sami	70 years	2,000.00
9		X	Madina	Sami	70 years & HH head	3,600.00
10	X		Madina	Sami	71 years	2,000.00
11	X		Fori	Sami	72 years	2,000.00
12	X		Forri	Sami	75 years	2,000.00
13		X	Forri	Sami	70 years/HH	3,600.00
14		X	Mbapaff	Sami	75 years	2,000.00
15	X		Tabanani	Sami	75 years	2,000.00
16	X		Tabanani	Sami	78 years	2,000.00
<b>12</b>	<b>4</b>					
1	X		Njiebeh	Sandu	74 years	2,000.00
2	X		Nawdeh	Sandu	75 years	2,000.00
3	X		Nawdeh	Sandu	70 years	2,000.00
4	X		Sare Jallow	Sandu	88 years	2,000.00
5	X		Sare Jallow	Sandu	70 years	2,000.00
6	X		Sare Jallow	Sandu	75 years	2,000.00

7		X	Sare Jallow	Sandu	70 ars/visual issues	2,000.00
8	X		Sankabary	Sandu	75 years	2,000.00
9		X	Sankabary	Sandu	Visually Impaired	2,000.00
10		X	Nyankui	Sandu	Physical disability	2,000.00
11	X		Nyankui	Sandu	90 years	2,000.00
12	X		Demba Wandu	Sandu	85 years	2,000.00
13		X	Demba Wandu	Sandu	75 years	2,000.00
14	X		Mamady Ceesay	Sandu	73 years	2,000.00
15	X		Mamady Ceesay	Sandu	80 years	2,000.00
16		X	Mamady Ceesay	Sandu	70 years	2,000.00
17	X		Mamady Ceesay	Sandu	70 years	2,000.00
<b>12</b>	<b>5</b>					
<b>52</b>	<b>22</b>					

## **Appendix 6.1: Public announcement for GERRMP Phase III Resettlement Action Plan (RAP) development process**

The Gambia Electricity Restoration and Modernization Project (GERMP) is an electricity project funded by the Government of The Gambia (GOTG), the International Development Association (IDA), the European Investment Bank (EIB), and European Union (EU). It aims to increase NAWEC's generation capacity through renewable sources, and also to reinforce its transmission infrastructure in the Great Banjul Area (GBA) as well as in the provinces.

In this regard 30kV transmission lines with associated MV T-Offs and distribution networks will be constructed in certain parts of the provinces involving 92 communities in Central River, Upper River, North Bank, and Lower River Regions.

From 19<sup>th</sup> – 30<sup>th</sup> September 2023 an Environmental and Social Impact Assessment (ESIA) of the sub project was conducted along the proposed transmission corridors. The assessment identified potential impacts leading to involuntary resettlement, with consequences on the affected persons in terms of loss of property, income, sources of income and access to natural resources that constitute their livelihoods.

The Alkalo and community members of the affected communities listed below were met during consultations, and a census/survey conducted to identify the project affected persons along the corridors between 16<sup>th</sup> - 29<sup>th</sup> December 2023. All those whose land(s) and fruit trees will be affected by the Project, after confirmation with their respective Alkalo of being left out of the census/survey, are requested to contact the NAWEC Project Implementation Unit (PIU) as soon as possible. The cut-off-date indicated for the census is December 29<sup>th</sup> 2023. The communities affected are listed as:

### **CRR-S (Fuladu) Line corridors**

Corridor 1: Bansang – Njoben Karim (Via Mabali koto and Misira, (Partially Road Corridor – (Mabali kuta, Sare Pateh Jawo and Njoben Karim))

Corridor 2: Bantanto – Manneh Kunda (Via Jibel) – Along Road Corridor

Corridor 3: Manneh Kunda – Sare Tamanso (Via Sare Giddeh, Charen and Belal Fass, Sare Debo) (Partially Road Corridor – (Charen, Belal Fass, Sare Debo and Sare Tamanso))

Corridor 4: Sare Tamanso –Njoben Karim (Via Sare Pateh Jawo)

Corridor 4A: Tamba Kunda – Njoren (Via Abeokuta Daru and Tandi) (Tamba Kunda – Abeokuta, Abeokuta – Daru and Daru – Tandi all are Road Corridors) – Njoren is also called Sankabari)

Corridor 5: Tamba Kunda – Sare Duta (Duta Wally) (Via Sare Modou, Sare Yorro Golori, Sare Pateh Ebadan, Sare Kali Kandeh, Sare Dembaru, Samba Tacko, Sare Chawto, Sare Yerro Yoba, Nyameng Kunda, Libras, Kerewan Dumbokono, Sincu Chedoyel, Sare Sileri, Kali Kunda, Sambundinya, Sare Mansong, Fuladu Sukuta, Sinchang Gelajo, Bani, and Sinchang Samba Mberry (Sinchu Samba))

Corridor 6: Santanto Bubu – Sinchu Samba Jawo (Via Santanto Mundong, Santanto Jabel, Santanto Ousman, Ndorma, Logomel, Santanto Wurumang, Cha Kunda, Jamwelly, Sinchang Faramba, Sare Soffie, Sare Jarje, Sare Samboido, Sare Yeroyel, Sare Pateh Gassama, Sare Ngallen, Sare Sawadi, Sare Ali and Sare Sabo)

Corridor 7: Sare Ali – Sare Gai (Via Charjel)

Corridor 8 Sambuya – Sare Bojo – (Via Sare Bakary) - Along Road Corridor

### **CRR-N (Sami) Line Corridors**

Corridor 1: Fittu Fula – Kujew Mandinka – (Via Kujew Fula)

Corridor 2: Changai Wollof – Daru Salam

Corridor 3: Renerou Junction – Sama Kunda (Via Ranerou Woloff, Tabanani, Chamen, Tabayel and Mbafaf,) – (Partially a Road Corridor (Renerou Junction to Tabanani is a Road Corridor)

Corridor 4: Ranerou Woloff – Njalal Toro (Via Ranerou Fula)

Corridor 5: Njalal Fula Junction – Njalal Fula

Corridor 6: Sami Tenda – Madiana (Via Forry)

### **URR-N (Sandu) Corridors**

Corridor 1: Demba Wandu – Sare Ngai (Via Mamadi Ceesay)

Corridor 2: Dasilame Secka – Jakari (Via Sare Kali, Nawdeh Tenda, Njie Kunda and Nyankui)

Corridor 3: Nawdeh – Wellingara Sussoh (Via Sare Jallow and Sankibai)

### **LRR Line Corridors**

Corridor 1: Soma – Misira – Along road corridor

Corridor 2: Soma – Toniataba – Along road corridor

### **NBR Line Corridors**

Corridor 1: Kerewan – Suwareh Kunda – Along Road Corridor

Claimants who feel they should be included should contact the projects Grievance Resolution Mechanism (GRM) through one of the contacts listed below, or visit the PIU Office, located at Emporium Complex, 114 Kairaba Avenue, Kanifing Municipality, to arrange a meeting with the surveyor and the Consultant. For further information, contact the Project's Social and Environment Safeguards Specialists:

Mr. Nuha Colley - Environmental Safeguards Specialist on Toll-free number:1266 (using Qcell):  
email: [ncolley@nawec.gm](mailto:ncolley@nawec.gm)

Mr. Ousman Mankara – Social Risk Management Specialist on Toll-free number:1226 (using Africell):  
email: [omankara@nawec.gm](mailto:omankara@nawec.gm)

**Appendix 6.2: Entitlement matrix for fruit trees**

PAP ID	Address	ID Card #	Impacted assets	Type of tree	No. of trees	Yield (kg)	Price/ kg	Compensation (D)
MBKO 08	Mabali koto	N/A	Fruit trees	Mango	1	150	25	2,500.00
MBKO 09	Mabali koto	N/A	Fruit trees	Mango	1	150	25	2,500.00
<b>Total PAPS</b>							<b>TOTAL</b>	<b>5,000.00</b>
MISI 01	Misira		Fruit trees	Mango	3	150	25	7,500.00
MISI 02	Misira	121056-510-002	Fruit trees	Mango	2	150	25	5,000.00
	Misira	121056-510-002	Fruit trees	Cashew	1	350	30	7,000.00
MISI 03	Misira	270857-510-001	Fruit trees	Mango	1	150	25	2,500.00
MISI 04	Misira	101069-020-008	Fruit trees	Mango	5	150	25	12,500.00
MISI 05	Misira	N/A	Fruit trees	Mango	4	150	25	10,000.00
MISI 06	Misira	100865-510-002	Fruit trees	Mango	5	150	25	12,500.00
MISI 07	Misira	N/A	Fruit trees	Mango	1	150	25	2,500.00
MISI 08	Misira	N/A	Fruit trees	Mango	2	150	25	5,000.00
MISI 09	Misira	N/A	Fruit trees	Mango	1	150	25	2,500.00
MISI 10	Misira	N/A	Fruit trees	Mango	3	150	25	7,500.00
MISI 11	Misira	5504873	Fruit trees	Mango	1	150	25	2,500.00
<b>Total PAPS</b>							<b>Subtotal</b>	<b>77,000.00</b>
			<b>31</b>			<b>82,000.00</b>		

**Appendix 6.3: Entitlement matrix for loss of farmland**

No:	PAP ID	Id card #	Land lost (M <sup>2</sup> )	Length of farm (M)	Number of poles	Area impacted (M <sup>2</sup> )	Land per M <sup>2</sup> (D)	Compensation (D)
1	MBKO 01	646248	4	177	2.77	11.08	158.6	1,757.00
2	MBKO 02	N/A	4	35	1.35	5.40	158.6	856.00
3	MBKO 03	N/A	4	140	2.40	9.60	158.6	1,523.00
4	MBKO 04	N/A	4	101	2.01	8.04	158.6	1,275.00
5	MBKO 05	N/A	4	69	1.69	6.76	158.6	1,072.00
6	MBKO 06	100565520001	4	177	2.77	11.08	158.6	1,757.00
7	MBKO 07	307495	4	119	2.19	8.76	158.6	1,389.00
<b>Subtotal = 7</b>								
1	MISI 03	270857-510-001	4	153	2.53	10.12	158.6	1,605.00
<b>Subtotal = 1</b>								
1	MNKD 01	N/A	4	172	2.72	10.88	158.6	1,726.00
<b>Subtotal = 1</b>								
1	SGID 01	N/A	4	105	2.05	8.20	158.6	1,301.00
2	SGID 02	N/A	4	50	1.50	6.00	158.6	952.00
3	SGID 03	N/A	4	110	2.10	8.40	158.6	1,332.00
4	SGID 04	N/A	4	115	2.15	8.60	158.6	1,364.00
5	SGID 05	230358-610-001	4	119	2.19	8.76	158.6	1,389.00
6	SGID 06	N/A	4	131	2.31	9.24	158.6	1,465.00
7	SGID 07	061056-010-001	4	100	2.00	8.00	158.6	1,269.00

<b>Subtotal = 7</b>								
1	TNDI 01	3062401	4	315	4.15	16.60	158.6	2,633.00
2	TNDI 02	N/A	4	448	5.48	21.92	158.6	3,477.00
3	TNDI 03	N/A	4	126	2.26	9.04	158.6	1,423.00
4	TNDI 04	N/A	4	225	3.25	13.00	158.6	2,062.00
5	TNDI 05	N/A	4	92	1.92	7.68	158.6	1,218.00
<b>Subtotal = 5</b>								
1	NJOR 01	220684-510-001	4	146	2.46	9.84	158.6	1,561.00
<b>Subtotal = 1</b>								
1	TAMK 01	N/A	4	220	3.20	12.80	158.6	2,030.00
<b>Subtotal = 1</b>								
1	SMOD 01	150352-510-001	4	120	2.20	8.80	158.6	1,396.00
	SMOD 01	150352-510-001	4	180	2.80	11.20	158.6	1,776.00
	SMOD 01	150352-510-001	4	212	3.12	12.48	158.6	1,979.00
2	SMOD 02	N/A	4	162	2.62	10.48	158.6	1,662.00
	SMOD 02	N/A	4	65	1.65	6.60	158.6	1,047.00
<b>Subtotal = 2</b>								
1	SYGO 01	040480-610-004	4	246	3.46	13.84	158.6	2,195.00
2	SYGO 02	N/A	4	50	1.50	6.00	158.6	952.00
3	SYGO 03	030674-610-004	4	218	3.18	12.72	158.6	2,017.00
4	SYGO 04	N/A	4	98	1.98	7.92	158.6	1,256.00
	SYGO 04	N/A	4	205	3.05	12.20	158.6	1,935.00
5	SYGO 05	N/A	4	85	1.85	7.40	158.6	1,174.00
6	SYGO 06	N/A	4	150	2.50	10.00	158.6	1,586.00
7	SYGO 08	140488-610-001	4	96	1.96	7.84	158.6	1,243.00
8	SYGO 09	101159-510-001	4	63	1.63	6.52	158.6	1,034.00
9	SYGO 10	N/A	4	50	1.50	6.00	158.6	952.00

10	SYGO 11	N/A	4	500	6.00	24.00	158.6	3,806.00
<b>Subtotal = 10</b>								
1	SPEB 01	N/A	4	80	1.80	7.20	158.6	1,142.00
2	SPEB 02	030277-610-002	4	95	1.95	7.80	158.6	1,237.00
3	SPEB 03	N/A	4	56	1.56	6.24	158.6	990.00
4	SPEB 04	100265-520-010	4	200	3.00	12.00	158.6	1,903.00
<b>Subtotal = 4</b>								
1	SMTA 01	30200465	4	56	1.56	6.24	158.6	990.00
2	SMTA 02	190562-010-001	4	194	2.94	11.76	158.6	1,865.00
	SMTA 02	190562-010-001	4	66	1.66	6.64	158.6	1,053.00
3	SMTA 03	060465-610-002	4	88	1.88	7.52	158.6	1,193.00
4	SMTA 04	151289-160-001	4	276	3.76	15.04	158.6	2,385.00
5	SMTA 05	100153-510-002	4	72	1.72	6.88	158.6	1,091.00
<b>Subtotal = 5</b>								
1	SABR 01	1832106151	4	219	3.19	12.76	158.6	2,024.00
2	SABR 02	N/A	4	162	2.62	10.48	158.6	1,662.00
3	SABR 03	210860-510-001	4	110	2.10	8.40	158.6	1,332.00
<b>Subtotal = 3</b>								
1	SKKN 01	N/A	4	248	3.48	13.92	158.6	2,208.00
2	SKKN 02	N/A	4	47	1.47	5.88	158.6	933.00
3	SKKN 03	N/A	4	85	1.85	7.40	158.6	1,174.00
4	SKKN 04	N/A	4	201	3.01	12.04	158.6	1,910.00
5	SKKN 05	160462-610-004	4	113	2.13	8.52	158.6	1,351.00
6	SKKN 06	010190-610-020	4	170	2.70	10.80	158.6	1,713.00
<b>Subtotal = 6</b>								
1	SCWT 01	120654-620-004	4	97	1.97	7.88	158.6	1,250.00
2	SCWT 02	N/A	4	120	2.20	8.80	158.6	1,396.00

3	SCWT O3	N/A	4	90	1.90	7.60	158.6	1,205.00
4	SCWT O4	N/A	4	142	2.42	9.68	158.6	1,535.00
5	SCWT O5	N/A	4	146	2.46	9.84	158.6	1,561.00
6	SCWT O6	N/A	4	48	1.48	5.92	158.6	939.00
<b>Subtotal = 6</b>								
1	SYYO 01	1832106010	4	48	1.48	5.92	158.6	939.00
2	SYYO 02	160364-510-002	4	212	3.12	12.48	158.6	1,979.00
<b>Subtotal = 2</b>								
1	NYMK 01	N/A	4	191	2.91	11.64	158.6	1,846.00
2	NYMK 02	020676-510-001	4	82	1.82	7.28	158.6	1,155.00
	NYMK 02	N/A	4	53	1.53	6.12	158.6	971.00
3	NYMK 03	N/A	4	30	1.30	5.20	158.6	825.00
4	NYMK 04	N/A	4	182	2.82	11.28	158.6	1,789.00
5	NYMK 05	N/A	4	294	3.94	15.76	158.6	2,500.00
6	NYMK 06	N/A	4	100	2.00	8.00	158.6	1,269.00
<b>Subtotal = 6</b>								
1	KDMK 01	1036701	4	366	4.66	18.64	158.6	2,956.00
<b>Subtotal = 1</b>								
1	SCHE 01	20117051	4	55	1.55	6.20	158.6	983.00
2	SCHE 02	N/A	4	140	2.40	9.60	158.6	1,523.00
3	SCHE 03	N/A	4	85	1.85	7.40	158.6	1,174.00
4	SCHE 04	18121062408	4	73	1.73	6.92	158.6	1,098.00
5	SCHE 05	N/A	4	108	2.08	8.32	158.6	1,320.00
6	SCHE 06	N/A	4	98	1.98	7.92	158.6	1,56.00
7	SCHE 07	12096651	4	115	2.15	8.60	158.6	1,364.00
8	SCHE 08	190574-510-001	4	180	2.80	11.20	158.6	1,776.00
<b>Subtotal = 8</b>								

1	SSLR 01	N/A	4	134	2.34	9.36	158.6	1,484.00
2	SSLR 02	040265-610-003	4	184	2.84	11.36	158.6	1,802.00
3	SSLR 03		4	292	3.92	15.68	158.6	2,487.00
4	SSLR 04		4	88	1.88	7.52	158.6	1,193.00
<b>Subtotal = 4</b>								
1	KLKD 01		4	1,140	12.40	49.60	158.6	7,867.00
<b>Subtotal = 1</b>								
1	SMDY 01	N/A	4	125	2.25	9.00	158.6	1,427.00
	SMDY 01	N/A	4	306	4.06	16.24	158.6	2,576.00
2	SMDY 02	1812106241	4	100	2.00	8.00	158.6	1,269.00
<b>Subtotal = 2</b>								
1	SMAN 01	N/A	4	100	2.00	8.00	158.6	1,269.00
2	SMAN 02	090592-11-278	4	138	2.38	9.52	158.6	1,510.00
3	SMAN 03	150635-510-001	4	200	3.00	12.00	158.6	1,903.00
4	SMAN 04	N/A	4	224	3.24	12.96	158.6	2,055.00
<b>Subtotal = 4</b>								
1	SUKU 02	80251610001	4	80	1.80	7.20	158.6	1,142.00
	SUKU 02	80251610001	4	121	2.21	8.84	158.6	1,402.00
2	SUKU 04	1812106211	4	160	2.60	10.40	158.6	1,649.00
3	SUKU 05	070344-510-001	4	150	2.50	10.00	158.6	1,586.00
	SUKU 05	070344-510-001	4	216	3.16	12.64	158.6	2,005.00
	SUKU 05	070344-510-001	4	107	2.07	8.28	158.6	1,313.00
4	SUKU 07	080251-610-001	4	155	2.55	10.20	158.6	1,618.00
	SUKU 07	080251-610-001	4	80	1.80	7.20	158.6	1,142.00
<b>Subtotal = 4</b>								
1	BANI 01		4	121	2.21	8.84	158.6	1,402.00
2	Bani 02		4	300	4.00	16.00	158.6	2,538.00

<b>Subtotal = 2</b>								
1	SBUB 01		4	482	5.82	23.28	158.6	3,692.00
<b>Subtotal = 1</b>								
1	SMUN 01	28029451	4	132	2.32	9.28	158.6	1,472.00
2	SMUN 02	N/A	4	80	1.80	7.20	158.6	1,142.00
3	SMUN 03	8221062815	4	182	2.82	11.28	158.6	1,789.00
<b>Subtotal = 3</b>								
1	SAJA 01	18221063011	4	90	1.90	7.60	158.6	1,205.00
2	SAJA 02	N/A	4	60	1.60	6.40	158.6	1,015.00
3	SAJA 03	230586-510-001	4	100	2.00	8.00	158.6	1,269.00
4	SAJA 04	040582-510-001	4	120	2.20	8.80	158.6	1,396.00
<b>Subtotal = 4</b>								
1	SOUS 01		4	55	1.55	6.20	158.6	983.00
	SOUS 01		4	82	1.82	7.28	158.6	1,155.00
2	SOUS 02		4	2	1.02	4.08	158.6	647.00.00
3	SOUS 03		4	60	1.60	6.40	158.6	1,015.00
4	SOUS 04		4	250	3.50	14.00	158.6	2,220.00
	SOUS 04		4	250	3.50	14.00	158.6	2,220.00
5	SOUS 05		4	280	3.80	15.20	158.6	2,411.00
6	SOUS 08		4	30	1.30	5.20	158.6	825.00
<b>Subtotal = 6</b>								
1	NDOR 01		4	102	2.02	8.08	158.6	1,281.00
2	NDOR 02		4	250	3.50	14.00	158.6	2,220.00
	NDOR 02		4	265	3.65	14.60	158.6	2,316.00
3	NDOR 03		4	80	1.80	7.20	158.6	1,142.00
4	NDOR 04		4	265	3.65	14.60	158.6	2,316.00
<b>Subtotal = 4</b>								

1	LOGO 01		4	65	1.65	6.60	158.6	1,047.00
2	LOGO 02		4	80	1.80	7.20	158.6	1,142.00
3	LOGO 03		4	82	1.82	7.28	158.6	1,155.00
4	LOGO 04		4	110	2.10	8.40	158.6	1,332.00
5	LOGO 05		4	200	3.00	12.00	158.6	1,903.00
6	LOGO 06		4	115	2.15	8.60	158.6	1,364.00
<b>Subtotal = 6</b>								
1	CHAK 01		4	186	2.86	11.44	158.6	1,814.00
2	CHAK 02		4	430	5.30	21.20	158.6	3,362.00
3	CHAK 03		4	495	5.95	23.80	158.6	3,775.00
4	CHAK 04		4	122	2.22	8.88	158.6	1,408.00
5	CHAK 05		4	225	3.25	13.00	158.6	2,062.00
<b>Subtotal = 5</b>								
1	JAMW 03		4	90	1.90	7.60	158.6	1,205.00
2	JAMW 04		4	90	1.90	7.60	158.6	1,205.00
3	JAMW 05		4	85	1.85	7.40	158.6	1,174.00
4	JAMW 06		4	90	1.90	7.60	158.6	1,205.00
	JAMW 06		4	95	1.95	7.80	158.6	1,237.00
5	JAMW 07		4	64	1.64	6.56	158.6	1,040.00
6	JAMW 09		4	85	1.85	7.40	158.6	1,174.00
<b>Subtotal = 6</b>								
1	SFAR 01		4	217	3.17	12.68	158.6	2,011.00
2	SFAR 01		4	22	1.22	4.88	158.6	774.00
3	SFAR 01		4	46	1.46	5.84	158.6	926.00
4	SFAR 01		4	170	2.70	10.80	158.6	1,713.00
5	SFAR 01		4	138	2.38	9.52	158.6	1,510.00
<b>Subtotal =5</b>								

1	SSOF 01		4	125	2.25	9.00	158.6	1,427.00
2	SSOF 02		4	35	1.35	5.40	158.6	856.00
3	SSOF 03		4	100	2.00	8.00	158.6	1,269.00
4	SSOF 04		4	413	5.13	20.52	158.6	3,254.00
5	SSOF 05		4	345	4.45	17.80	158.6	2,823.00
6	SSOF 06		4	178	2.78	11.12	158.6	1,764.00
<b>Subtotal = 6</b>								
1	SJAJ 01		4	148	2.48	9.92	158.6	1,573.00
2	SJAJ 02		4	96	1.96	7.84	158.6	1,243.00
3	SJAJ 03		4	82	1.82	7.28	158.6	1,155.00
<b>Subtotal = 3</b>								
1	SMBO 01		4	110	2.10	8.40	158.6	1,332.00
	SMBO 01		4	152	2.52	10.08	158.6	1,599.00
2	SMBO 02		4	135	2.35	9.40	158.6	1,491.00
	SMBO 02		4	55	1.55	6.20	158.6	983.00
3	SMBO 03		4	150	2.50	10.00	158.6	1,586.00
4	SMBO 06		4	140	2.40	9.60	158.6	1,523.00
5	SMBO 07		4	65	1.65	6.60	158.6	1,047.00
<b>Subtotal = 5</b>								
1	SYEY 01	N/A	4	380	4.80	19.20	158.6	3,045.00
2	SYEY 02	100644-620-001	4	380	4.80	19.20	158.6	3,045.00
<b>Subtotal = 2</b>								
1	SPGS 01		4	170	2.70	10.80	158.6	1,713.00
2	SPGS 02		4	141	2.41	9.64	158.6	1,529.00
3	SPGS 03		4	149	2.49	9.96	158.6	1,580.00
4	SPGS 04		4	280	3.80	15.20	158.6	2,411.00
5	SPGS 05		4	160	2.60	10.40	158.6	1,649.00

<b>Subtotal = 5</b>								
1	SNGL 01		4	135	2.35	9.40	158.6	1,491.00
2	SNGL 02		4	120	2.20	8.80	158.6	1,396.00
3	SNGL 03		4	136	2.36	9.44	158.6	1,497.00
	SNGL 03		4	105	2.05	8.20	158.6	1,301.00
4	SNGL 04		4	100	2.00	8.00	158.6	1,269.00
5	SNGL 05		4	75	1.75	7.00	158.6	1,110.00
<b>Subtotal = 5</b>								
1	SSAW 01		4	400	5.00	20.00	158.6	3,172.00
2	SSAW 02		4	185	2.85	11.40	158.6	1,808.00
<b>Subtotal = 2</b>								
1	SALI 01	1812106101	4	90	1.90	7.60	158.6	1,205.00
2	SALI 02	N/A	4	200	3.00	12.00	158.6	1,903.00
3	SALI 03	181210611	4	100	2.00	8.00	158.6	1,269.00
	SALI 03	181210611	4	140	2.40	9.60	158.6	1,523.00
4	SALI 04	N/A	4	51	1.51	6.04	158.6	958.00
5	SALI 05	N/A	4	132	2.32	9.28	158.6	1,472.00
6	SALI 06	N/A	4	125	2.25	9.00	158.6	1,427.00
7	SALI 07	N/A	4	90	1.90	7.60	158.6	1,205.00
<b>Subtotal = 7</b>								
1	CHJL 01		4	285	3.85	15.40	158.6	2,442.00
2	CHJL 02		4	166	2.66	10.64	158.6	1,688.00
3	CHJL 03		4	280	3.80	15.20	158.6	2,411.00
4	CHJL 04		4	100	2.00	8.00	158.6	1,269.00
	CHJL 04		4	190	2.90	11.60	158.6	1,840.00
5	CHJL 05		4	90	1.90	7.60	158.6	1,205.00
<b>Subtotal = 5</b>								

1	SGAI 01		4	75	1.75	7.00	158.6	1,110.00
2	SGAI 02		4	60	1.60	6.40	158.6	1,015.00
<b>Subtotal = 2</b>								
1	SSAB 01		4	60	1.60	6.40	158.6	1,015.00
2	SSAB 02		4	80	1.80	7.20	158.6	1,142.00
3	SSAB 03		4	95	1.95	7.80	158.6	1,237.00
4	SSAB 04		4	120	2.20	8.80	158.6	1,396.00
5	SSAB 05		4	80	1.80	7.20	158.6	1,142.00
<b>Subtotal = 5</b>								
1		4	200	3.00	12.00	155	1,860.00	
2		4	200	3.00	12.00	155	1,860.00	
3		4	60	1.60	6.40	155	992.00	
4		4	103	2.03	8.12	155	1,259.00	
5		4	130	2.30	9.20	155	1,426.00	
6		4	50	1.50	6.00	155	930.00	
7		4	90	1.90	7.60	155	1,178.00	
1		4	65	1.65	6.60	155	1,023.00	
2		4	65	1.65	6.60	155	1,023.00	
3		4	120	2.20	8.80	155	1,364.00	
4		4	170	2.70	10.80	155	1,674.00	
1		4	170	2.70	10.80	155	1,674.00	
2		4	220	3.20	12.80	155	1,984.00	
1		4	75	1.75	7.00	155	1,085.00	
		4	360	4.60	18.40	155	1,153.00	

2		4	86	1.86	7.44	155	3,100.00
3		4	400	5.00	20.00	155	2,852.00
		4	1160	12.60	50.40	155	7,812.00
4		4	290	3.90	15.60	155	2,418.00
1		4	530	6.30	25.20	155	3,906.00
2		4	140	2.40	9.60	155	1,488.00
1		4	140	2.40	9.60	155	1,488.00
2		4	41	1.41	5.64	155	874.00
3		4	61	1.61	6.44	155	998.00
4		4	43	1.43	5.72	155	887.00
5		4	80	1.80	7.20	155	1,116.00
6		4	72	1.72	6.88	155	1,066.00
7		4	60	1.60	6.40	155	992.00
8		4	104	2.04	8.16	155	1,265.00
1		4	118	2.18	8.72	155	1,352.00
2		4	92	1.92	7.68	155	1,190.00
3		4	54	1.54	6.16	155	955.00
4		4	46	1.46	5.84	155	905.00
5		4	186	2.86	11.44	155	1,773.00
1		4	101	2.01	8.04	155	1,246.00

2		4	211	3.11	12.44	155	1,928.00
1		4	125	2.25	9.00	155	1,395.00
		4	122	2.22	8.88	155	2,232.00
2		4	260	3.60	14.40	155	1,376.00
3		4	80	1.80	7.20	155	1,116.00
4		4	115	2.15	8.60	155	1,333.00
		4	75	1.75	7.00	155	1,085.00
5		4	101	2.01	8.04	155	1,246.00
		4	172	2.72	10.88	155	1,686.00
1		4	90	1.90	7.60	155	1,178.00
2		4	470	5.70	22.80	155	3,534.00
3		4	122	2.22	8.88	155	1,376.00
1		4	125	2.25	9.00	155	1,395.00
2		4	15	1.15	4.60	155	713.00
3		4	26	1.26	5.04	155	781.00
4		4	50	1.50	6.00	155	930.00
5		4	35	1.35	5.40	155	837.00
		4	140	2.40	9.60	155	1,104.00
6		4	78	1.78	7.12	155	942.00
7		4	52	1.52	6.08	155	1,141.00

8		4	84	1.84	7.36	155	1,488.00
1		4	125	2.25	9.00	155	1,395.00
2		4	55	1.55	6.20	155	961.00
3		4	318	4.18	16.72	155	2,592.00
4		4	351	4.51	18.04	155	2,796.00
5		4	150	2.50	10.00	155	1,550.00
6		4	430	5.30	21.20	155	3,286.00
1		4	398	4.98	19.92	155	3,088.00
2		4	353	4.53	18.12	155	2,809.00
3		4	290	3.90	15.60	155	2,418.00
4		4	226	3.26	13.04	155	2,021.00
5		4	131	2.31	9.24	155	1,432.00
6		4	69	1.69	6.76	155	1,048.00
7		4	13	1.13	4.52	155	701.00
8		4	45	1.45	5.80	155	899.00
9		4	45	1.45	5.80	155	899.00
10		4	27	1.27	5.08	155	787.00
11		4	33	1.33	5.32	155	825.00
12		4	47	1.47	5.88	155	911.00
13		4	50	1.50	6.00	155	930.00
1		4	362	4.62	18.48	155	2,864.00
1	3049559	4	265	3.65	14.60	155	2,263.00

1		4	270	3.70	14.80	155	2,294.00
		4	100	2.00	8.00	155	1,978.00
		4	143	2.43	9.72	155	961.00
2		4	219	3.19	12.76	155	1,550.00
3		4	55	1.55	6.20	155	1,798.00
		4	190	2.90	11.60	155	1,798.00
4		4	150	2.50	10.00	155	1,240.00
5		4	190	2.90	11.60	155	1,011.00
6		4	53	1.53	6.12	155	794.00
		4	100	2.00	8.00	155	1,321.00
7		4	63	1.63	6.52	155	1,240.00
8		4	28	1.28	5.12	155	949.00
9		4	113	2.13	8.52	155	1,550.00
10		4	130	2.30	9.20	155	1,507.00
11		4	238	3.38	13.52	155	1,426.00
12		4	150	2.50	10.00	155	2,096.00
1		4	138	2.38	9.52	155	1,476.00
2		4	210	3.10	12.40	155	1,922.00
3		4	167	2.67	10.68	155	1,655.00
4		4	50	1.50	6.00	155	930.00

5		4	57	1.57	6.28	155	973.00
6		4	32	1.32	5.28	155	818.00
1		4	205	3.05	12.20	144.4	1,762.00
2		4	225	3.25	13.00	144.4	1,877.00
3		4	225	3.25	13.00	144.4	1,877.00
4		4	470	5.70	22.80	144.4	3,292.00
1		4	305	4.05	16.20	144.4	2,339.00
		4	75	1.75	7.00	144.4	1,848.00
2		4	220	3.20	12.80	144.4	1,011.00
3		4	60	1.60	6.40	144.4	924.00
4		4	45	1.45	5.80	144.4	838.00
5		4	35	1.35	5.40	144.4	780.00
6		4	295	3.95	15.80	144.4	2,282.00
7		4	490	5.90	23.60	144.4	3,408.00
8		4	215	3.15	12.60	144.4	1,819.00
1		4	115	2.15	8.60	144.4	1,242.00
2		4	200	3.00	12.00	144.4	1,733.00
3		4	75	1.75	7.00	144.4	1,011.00
4		4	38	1.38	5.52	144.4	797.00
5		4	85	1.85	7.40	144.4	1,069.00

1		4	470	5.70	22.80	144.4	3,292.00
1		4	276	3.76	15.04	144.4	2,172.00
2		4	160	2.60	10.40	144.4	1,502.00
1		4	565	6.65	26.60	144.4	3,841.00
		4	270	3.70	14.80	144.4	1,912.00
2		4	231	3.31	13.24	144.4	1,993.00
3		4	245	3.45	13.80	144.4	2,137.00
4		4	135	2.35	9.40	144.4	1,357.00
1		4	70	1.70	6.80	144.4	982.00
2		4	175	2.75	11.00	144.4	1,588.00
3		4	120	2.20	8.80	144.4	1,629.00
		4	182	2.82	11.28	144.4	1,675.00
4		4	190	2.90	11.60	144.4	2,686.00
5		4	365	4.65	18.60	144.4	1,271.00
6		4	70	1.70	6.80	144.4	982.00
7		4	80	1.80	7.20	144.4	1,040.00
8		4	316	4.16	16.64	144.4	2,403.00
1		4	140	2.40	9.60	144.4	1,386.00
2		4	160	2.60	10.40	144.4	1,502.00
		4	45	1.45	5.80	144.4	838.00
3		4	75	1.75	7.00	144.4	1,011.00

4		4	40	1.40	5.60	144.4	809.00
		4	290	3.90	15.60	144.4	2,253.00
		4	360	4.60	18.40	144.4	2,657.00
5		4	60	1.60	6.40	144.4	924.00
6		4	102	2.02	8.08	144.4	1,167.00
7		4	170	2.70	10.80	158.6	1,560.00
8		4	420	5.20	20.80	158.6	3,004.00
9		4	275	3.75	15.00	158.6	2,166.00
10		4	100	2.00	8.00	158.6	1,155.00
11		4	85	1.85	7.40	158.6	1,069.00
12		4	85	1.85	7.40	158.6	1,069.00
13		4	63	1.63	6.52	158.6	941.00
14		4	260	3.60	14.40	158.6	2,079.00
1		4	305	4.05	16.20	144.4	2,339.00
2		4	242	3.42	13.68	144.4	1,975.00
3		4	160	2.60	10.40	144.4	1,502.00
1		4	85	1.85	7.40	144.4	1,069.00
2		4	90	1.90	7.60	144.4	1,097.00
		4	107	2.07	8.28	144.4	2,085.00
3		4	261	3.61	14.44	144.4	728.00
4		4	90	1.90	7.60	144.4	1,097.00
5	3167358	4	365	4.65	18.60	144.4	2,686.00

6		4	292	3.92	15.68	144.4	2,264.00
7		4	26	1.26	5.04	144.4	1,196.00
8		4	80	1.80	7.20	144.4	1,040.00
		4	390	4.90	19.60	144.4	2,830.00
1		4	125	2.25	9.00	144.4	1,300
2		4	250	3.50	14.00	144.4	2,022
3		4	415	5.15	20.60	144.4	2,975
4		4	125	2.25	9.00	144.4	1,300
5		4	75	1.75	7.00	144.4	1,011.00
		4	160	2.60	10.40	144.4	1,502.00
6		4	70	1.70	6.80	144.4	982.00
7		4	140	2.40	9.60	144.4	1,386.00
1		4	100	2.00	8.00	144.4	1,155.00
2		4	60	1.60	6.40	144.4	924.00
3	5055079	4	150	2.50	10.00	144.4	1,444.00
4		4	120	2.20	8.80	144.4	1,271.00

