

REPUBLIC OF THE GAMBIA



**WA-REMP MPA – Phase 2 : REGIONAL ELECTRICITY
ACCESS AND GENERATION SUPPORT
(P515184)**

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

For Negotiations

MARCH 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (hereinafter "the Recipient") is planning to implement the WA-REMP MPA Phase 2 : Regional Electricity Access And Generation Support (P515184) (hereinafter "the Project") with the involvement of the NAWEC Project Implementation Unit (PIU) under the Ministry of Petroleum, Energy and Mines (MOPEM) and the National Water and Electricity Company (NAWEC). The International Development Association (hereinafter the Association) has agreed to provide financing for the Project, as set out in the Agreement.
2. The Republic of The Gambia shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Republic of The Gambia shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Republic of The Gambia shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Republic of The Gambia, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Republic of The Gambia agree to update the ESCP to reflect the Waremp concept note. These changes through an exchange of letters signed between the Association and the Permanent Secretary of the Ministry of Petroleum, Energy and Mines. The Republic of The Gambia shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. Establish and maintain the Project Implementation Unit (PIU) under the National Water and Electricity Company (NAWEC) at the Ministry of Petroleum, Energy and Mines (MOPEM) with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including one Environmental Specialist and one Social Specialist.</p> <p>b. Ensure full-time and exclusive availability of qualified Environmental and Social Specialists..</p> <p>c. Enter into collaboration arrangements with the National Environment Agency (NEA), Labor Department and NCAC to manage E&S risks and impacts of the Project, and Department of Forestry for the management of trees and forest affected.</p>	<p>a. Maintain the current PIU with one (1) environmental specialist and one (1) social specialist, entirely dedicated to the WA-REMP Gambia,</p> <p>b. Prepare the Memorandum of Understanding (MoU) between the PIU and NEA, and between PIU and DoF before the project's Effectiveness and maintain the MoU throughout the project implementation.</p>	<p>National Water and Electricity Company NAWEC (NAWEC) Project Implementation Unit (PIU)</p>

<p>B</p>	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <p>1. Target Group: PIU, Implementing Entities (IE) and NAWEC at central and local level department agents</p> <p>Trainings topics:</p> <ul style="list-style-type: none"> ✓ The World Bank Environmental and Social Framework (ESF). ✓ Geo-Enabling initiative for Monitoring and Supervision (GEMS) ✓ Environmental and Social Impact Assessment and ESMP implementation. ✓ Workers and community health and safety including road safety and Incidents Reporting requirements. ✓ SEA/SH/ Violence against children (VAC) risk awareness; SEA/SH Prevention and Response Action Plan, including Codes of Conduct ✓ Implementation of Labor Management Procedures including workers GM ✓ Incident reporting ✓ Grievance mechanism for the project, project workers and referral pathways for SEA/SH <p>2. Target Group: Suppliers/Contractors/Sub-contractors/Workers on site</p> <p>Trainings topics:</p> <ul style="list-style-type: none"> ✓ Occupational health and safety including incident and accidents reporting, preparedness and response arrangements to emergency situations ✓ Labor Management Procedures including workers GM and CoCs ✓ Risks of GBV/SEA/SH awareness, SEA/SH Prevention and Response Action Plan 	<p>Throughout Project Implementation</p> <p>Prior to working on site and regular intervals during implementation</p>	<p>PIU</p> <p>PIU with Support from EI and National Agencies</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	✓ World Bank ESSs and ESMP implementation		
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. 	Submit quarterly reports to the Association throughout Project implementation, commencing three months after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.	PIU
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	Submit the monthly reports to the Association upon request to be submitted under action C above.	PIU
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p>	Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS</p> <p>1. Prepare and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the Project, consistent with the relevant ESSs.</p> <p>2. Require Contractors to prepare and implement C-ESMP as set out in the ESIA/ESMPs.</p>	<p>1. Prepare the ESIA and ESMP and incorporate relevant aspects of the ESMP as part of the respective bidding documents prior to the start of project activities. Once finalized, implement the ESIA and ESMP throughout Project implementation.</p> <p>2. Prior to the start of works and throughout their implementation .</p>	PIU
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, specify relevant E&S assessments or plans, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors and supervision firms to the Association.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.</p>	PIU
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, , that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	<p>Throughout Project implementation.</p>	PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 2: LABOR AND WORKING CONDITIONS		
<p>2.1 LABOR MANAGEMENT PROCEDURES</p> <ul style="list-style-type: none"> The Borrower shall ensure that labor management and working conditions for all Project workers are consistent with this ESCP and with the Borrower/Recipient's labor framework, which includes, but is not limited to, the country's relevant policy, legal and institutional framework, including its national, departmental, or local implementing institutions, and the applicable laws, regulations, procedures, and implementation capacity. The Borrower shall promptly notify the Bank/Association of any changes to the labor framework that may materially adversely affect the Borrower/Recipient's ability to manage the labor risks and impacts of the Project in line with ESS2 and the immediate measures taken or that are planned to be taken to address said changes and their ensuing potential risks and impacts of the Project. If the Bank/Association determines that these changes negatively affect ESS2 risk management aspects of the Project, the Borrower/Recipient shall agree to implement additional measures and actions to address them in a manner acceptable to the Bank/Association. The ESCP shall be updated to reflect such agreed actions. Labor-related requirements and compliance monitoring must be incorporated into the Project Operations Manual (POM) 	<p>The PIU shall submit quarterly reports from the Department of Labor detailing ESS2 compliance, occupational health and safety (OHS) incident reporting, functioning of the age verification mechanisms and worker grievances. These reports shall be included in regular environmental and social (E&S) reporting during implementation support missions or as requested by the Bank/Association. These requirements apply throughout Project implementation</p>	<p>PIU</p>
<p>2.2 OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Prepare and implement an OHS Management Plans for the energy activities to assess and manage the OHS risks and impacts of the Project.</p> <p>AND</p> <p>Require contractors and subcontractors to prepare and implement OHS Management Measures in accordance with the OHS Management Plan measures in accordance with the Construction ESMP to be prepared under action 1.1.</p>	<p>Prepare the OHS Management Plans for the road and energy activities same timeframe as for the preparation of the respective subproject ESMP and thereafter implement the plan throughout Project implementation.</p>	<p>PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <ul style="list-style-type: none"> The Borrower/Recipient shall align the Project's grievance mechanism (GM) with, and operationalize it through, the existing country systems in coordination with the Labor Inspectorate and the Ombudsman. The GM shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner. The GM shall ensure strict privacy and confidentiality protocols and prioritize the wishes and safety of survivors in all response actions. The requirement to maintain and monitor the GM, including compliance monitoring, must be included in the POM. Adequate budget to carry out the enforcement and monitoring activities must be included in the PTBA. The Project Implementation Unit (PIU) is responsible for documenting and following up on all project-related grievances, including SEA/SH cases, and for keeping the Bank/Association informed of cases and updates as part of regular reporting. 	The GM must be maintained and operated throughout Project implementation Unit. All project workers must be informed of the GM and trained on its use, including SEA/SH reporting pathways and survivor-centered protocols.	PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Prepare the WMP as part of the specific instruments (ESIAs/ESMPs) and contractors ESMPs and thereafter implement the WMP throughout Project implementation.	PIU
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.</p>	Same timeframe as for the preparation and implementation of the ESMP	PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.</p>	Same timeframe as for the preparation and implementation of the ESMP.	PIU
4.2	<p>COMMUNITY HEALTH AND SAFETY</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs prepared in accordance with the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs.	PIU
4.3	SEA AND SH RISKS Prepare and implement a SEA/SH Action Plan as part of the ESMP to assess and manage the risks of SEA and SH.	The SEA/SH Action Plan will be prepared prior to Project Effectiveness and thereafter implement the SEA/SH Action Plan throughout Project implementation.	PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT FRAMEWORK 1. Prepare and implement a Resettlement Plan (RP) or a Livelihood Restoration Plan (LRP) for each activity under the Project for such RP or LRP is required and consistent with ESS5.	1. The PIU will prepare and implement the respective RPs or LRPs prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.	PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Prepare and implement a Biodiversity Management Plan (BMP) as part of the ESMP in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS6.	Prepare the BMP Same timeframe as for the preparation and implementation of the ESMPs and thereafter implement the BMP throughout Project implementation.	PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES: This standard is not relevant			
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Ensure that the identification, protection, management, and conservation of cultural heritage that may be affected by the Project are undertaken in accordance with the ESCP,	Requirements for cultural heritage screening, assessment, avoidance and	PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<p>mitigation hierarchy, and compliance monitoring shall be incorporated into the site-specific ESMP including clear roles and responsibilities across the PIU, supervising engineers, contractors, and relevant authorities.</p> <p>Same timeframe as for the preparation and implementation of the ESMPs.</p> <p>The Borrower shall submit quarterly reports prepared in collaboration with the competent cultural heritage authority detailing ESS8 compliance, permits obtained, chance finds incidents and resolutions, consultations with affected communities and custodians, and any site-specific cultural heritage management plans (CHMPs). These reports will be included in regular environmental and social (E&S) reporting during implementation support missions or as requested by the Bank/Association.</p> <p>The above requirements apply throughout Project implementation.</p>	
8.2	<p>CHANCE FINDS</p> <ul style="list-style-type: none"> Develop a Chance Finds Procedure aligned with the national framework prior to commencement of any civil works, and ensure it is included in all bidding documents and contracts. The CFP shall: 	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ol style="list-style-type: none"> 1. Require immediate cessation of work within the discovery area. 2. Secure the site and prevent further disturbance. 3. Notify the competent authority (e.g., NCAC) and the PIU within 24 hours, and the Bank within 48 hours. 4. Provide for rapid assessment by qualified cultural heritage specialists and determination of appropriate measures (e.g., avoidance, conservation in situ, salvage and documentation) by the authority. 5. Specify decision-making timelines to minimize delays and ensure a safe, respectful, and legally compliant response. <ul style="list-style-type: none"> • Contractors, supervising engineers, and PIU field staff shall be trained on the CFP and their responsibilities, including reporting lines and stop-work protocols, prior to mobilization. • Implementation and monitoring of the CFP, including budgeted training and supervision, shall be included in the POM and the PTBA. • The CFP shall be maintained and enforced throughout Project implementation, with all chance finds recorded and reported in quarterly E&S reports. • 		
ESS 9: FINANCIAL INTERMEDIARIES: This Standard is not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Update and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p> <p>Implement the SEP throughout Project implementation and update/re-disclose it as needed to reflect changes in Project activities and sequencing.</p>	<p>The SEP was prepared and disclosed prior to Appraisal after WB review. The SEP will be implemented throughout Project implementation. If needed the SEP will be updated.</p>	PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p>	<p>The PIU already has an established and functional grievance mechanism that will be updated no later than three (3) months after project effective date and thereafter maintain and operate the mechanism throughout Project implementation.</p>	PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.		
INDICATORS FOR IMPLEMENTATION READINESS		
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> ✓ Maintenance of E&S risk management unit in the PIU with an Environmental and Specialists already recruited with planned additional hiring if necessary. ✓ Memorandums of Understanding: The PIU will be signing an MoU with the NEA, Labor Department, NCAC and DoF to ensure proper coordination of E&S risk management trees replanting activities. ✓ ESMP and other E&S risk management instruments prepared, consulted and disclosed prior to start of subprojects/ activities. <ul style="list-style-type: none"> • National labor-related requirements and compliance monitoring must be incorporated into the Project Operations Manual (POM). ✓ Strengthen the grievance mechanism including referral pathways for SEA/SH 		