

REPUBLIC OF THE GAMBIA



National Water and Electricity Company Ltd

The Gambia Water and Sanitation Project (P513113)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Appraisal

February 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (hereinafter "the Recipient") is planning to implement The Gambia Water and Sanitation Project (GWSP) (P513113) (hereinafter "the Project") with the involvement of the Project Implementation Unit of NAWEC under the Ministry of Petroleum, Energy and Mines (MOPEM). 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 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. 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. Enter into collaboration arrangements with the National Environment Agency (NEA) to manage E&S risks and impacts of the Project, and Department of Forestry for the management of trees and forest affected.</p> <p>c. Ensure full-time and exclusive availability of qualified Environmental and Social Specialists. Where exclusive dedication cannot be ensured, recruit additional qualified specialists to ensure effective supervision and compliance with the Environmental and Social Standards.</p>	<p>a. Maintain the current PIU with one (1) environmental specialist and one (1) social specialist, entirely dedicated to the GWSP, to be reassessed and confirmed positions prior to Project Effective Date and thereafter maintain the PIU and these positions throughout Project implementation.</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. Recruit additional qualified specialists to ensure effective supervision and compliance with the Environmental and Social Standards in case E&S specialists can't be exclusively dedicated to the GWSP.</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>All capacity-building activities and training shall be laid out in a plan embedded in the E&S instruments to be prepared before GWSP approval. Training shall be provided to the PIU, project workers and contractors to ensure that the Project is carried out in accordance with this ESCP.</p> <p>Trainings shall be prepared and delivered in accordance with the capacity building plan in the ESIA or IEAs and the following:</p> <ol style="list-style-type: none"> 1. Target Group: PIU, Ministry of Health (WASH Directorate), Department of Water Resources and National Environment Agencies (NEA), Grievance Resolution Committees at central and local level <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 ✓ Grievance Resolution Mechanism ✓ 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 CoCs ✓ Implementation of Labor Management Procedures including workers GM <ol style="list-style-type: none"> 2. Target Group: Suppliers/Contractors/Sub-contractors/Workers on site <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 	<p>Prepare a capacity building plan in the ESMF or ESIA's by project effective date.</p> <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
	<ul style="list-style-type: none"> ✓ Risks of GBV/SEA/SH awareness, SEA/SH Prevention and Response Action Plan ✓ 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. • Status of implementation of the MoU between PIU and NEA, and also with the Department of Forestry for the management of trees and forest affected. 	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</p>	Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.	PIU

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	<p>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> <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.</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 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, including,</p>	<p>Throughout Project implementation.</p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	inter alia, specify the E&S or plans to be supported under the TA in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.		PIU
1.4	CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC) FINANCING Prepare, consult, adopt, and disclose any environmental and social (E&S) instruments which may be required for activities under the CERC Part of the Project, in accordance with the CERC Manual (CM) and, if applicable, CERC-ESMF or CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.	<p>a) The adoption of the CM in form and substance acceptable to the Association is a withdrawal condition of the Financing Agreement for the Project.</p> <p>b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.</p>	The designated authority for the CERC and the Ministry of Finances
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Prepare and implement the Labor Management Procedures (LMP) for the Project. Details of labor management procedures will be reflected in the project operational manual (POM) for the Project in line with relevant national laws and regulations, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	Prepare and adopt the details of labor management procedures within the same timeframe as the preparation of the POM and thereafter implemented throughout Project implementation.	PIU
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Prepare and implement an OHS Management Plans for all the water and sanitation activities to assess and manage the OHS risks and impacts of the Project. AND	Prepare the OHS Management Plans for the water and sanitation activities at the same timeframe as for the preparation of the respective subproject ESMP and thereafter implement the plan throughout Project implementation.	PIU,

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	Require contractors and subcontractors to prepare and implement OHS Management Measures in accordance with the OHS Management Measures in accordance with the Construction ESMP to be prepared under action 1.1.		
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers and consistent with ESS2.	The worker grievance mechanism will be established under the LMP. Thereafter it will be operationalized 3 months after project effective date prior to engaging Project workers and maintained it throughout Project implementation.	PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN 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.	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	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP	PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP.	PIU
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared.	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			

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5.1	<p>RESETTLEMENT FRAMEWORK</p> <p>1. Prepare and implement a Resettlement Plan (RP) for each activity under the Project for such RP is required and consistent with ESS5.</p>	<p>1. The PIU will prepare and implement the respective Resettlement Plans or Livelihood Restoration Plans 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.</p> <p>2. A Facilitation Firm will be appointed to implement resettlement through an inclusive approach.</p>	PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Prepare and implement a Biodiversity Management Plan (BMP), if necessary, as part of the ESMP in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS6.</p>	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	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Details of Cultural Heritage Management Plan (CHMP) will be reflected in the project operational manual (POM) for the Project in line with relevant national laws and regulations,</p>	Prepare and adopt the details of cultural heritage management within the same timeframe as the preparation of the POM and thereafter implement measures throughout Project implementation.	PIU

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8.2	<p>CHANCE FINDS</p> <p>Details of Chance find will be reflected in the project operational manual (POM) for the Project in line with relevant national laws and regulations,</p>	Prepare and adopt the details of chance find procedures in the POM and implement the procedures throughout Project implementation.	PIU
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>	The SEP is prepared, will be consulted upon and will also be disclosed on the Government and World Bank websites. The SEP will be implemented throughout Project implementation. If needed the SEP will be updated.	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 grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p> <p>Ensure GRM channels and indicative service standards described in the SEP are operational (multiple channels including hotline/SMS, email, letters, walk-ins; acknowledgement and resolution timeframes as described in the SEP</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.	PIU
10.3	<p>SEA/SH-SENSITIVE GRM PROCEDURES OPERATIONALIZATION</p> <p>Operationalize the SEA/SH and VAC sensitive complaints procedure described in the SEP (separate pathway, confidentiality, survivor-centered approach, informed consent, referral to service providers; non-identifying reporting).</p>	Prior to commencement of activities involving workers and community interface; thereafter throughout Project implementation.	PIU (with relevant service providers and contractors as applicable)

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10.4	<p>STAKEHOLDER ENGAGEMENT ON SECTOR REFORMS</p> <p>Carry out ongoing stakeholder engagement and information disclosure on sector reform activities supported under the Project (including institutional restructuring and tariff-related measures), through SEP mechanisms (consultations, disclosure, feedback and GRM), consistent with ESS10.</p>	Throughout implementation of reform activities.	PIU / Relevant sector institutions as applicable
10.5	<p>GRM REPORTING (ESS10)</p> <p>Include in regular E&S reporting a summary of GRM performance (number/types of grievances received/resolved and timeframes, including SEA/SH cases reported in non-identifying form), consistent with SEP monitoring indicators.</p>	Quarterly (as part of Action C reporting) throughout Project implementation.	PIU
<p>INDICATORS FOR IMPLEMENTATION READINESS</p> <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 and DoF to ensure proper coordination of E&S risk management trees replanting activities. ✓ ESMF or ESIAs to be prepared duly consulted and disclosed by project effective date. <ul style="list-style-type: none"> - ESMP and other E&S risk management instruments prepared, consulted and disclosed prior to start of subprojects/ activities. ✓ SEP prepared duly consulted and disclosed by project Appraisal. ✓ LMP prepared duly consulted and disclosed by project effective date. ✓ RP prepared duly consulted and disclosed by project effective date. 			