

REPUBLIC OF THE GAMBIA



National Water and Electricity Company Ltd

The Gambia Water and Sanitation Project (P513113)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Version Negotiated

August 27, 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (hereinafter "the Recipient") will implement The Gambia Water and Sanitation Project (WASAP) (P513113) (hereinafter "the Project") with the involvement of National Water and Electricity Company Ltd. ("NAWEC" or "Project Implementing Entity"). The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the Financing Agreement between the Recipient and the Association and the Project Agreement between NAWEC and the Association (Agreements).
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, 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 Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, 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 Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the NAWEC. The Recipient 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	ORGANIZATIONAL STRUCTURE a. Maintain the Project Implementation Unit (PIU) under the National Water and Electricity Company Ltd. (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 fully dedicated to the Project, with terms of reference and qualifications acceptable to the Association. b. Enter into collaboration arrangements with the National Environment Agency (NEA), the Department of Forestry (DoF) as well as the Department of Labor (DoL) and the National Center for Arts and Culture (NCAC) to manage E&S risks and impacts of the Project. c. Ensure full-time and exclusive availability of qualified Environmental and Social Specialists. Where exclusive dedication cannot be ensured, recruit if necessary additional qualified E&S specialists to ensure effective supervision and compliance with the Environmental and Social Standards.	a. If the existing E&S specialists are not deemed adequate and fully dedicated to the Project in a manner acceptable to the Association, recruit one Environmental Specialist and one Social Specialist in the PIU prior to the Effective Date, and thereafter maintain the current PIU, including said positions entirely dedicated to the Project throughout Project implementation. b. Sign and execute Memoranda of Understanding MoUs between NAWEC and NEA, DoF as well as DoL and NCAC within three months after the Effective Date and thereafter maintain and implement the MoUs throughout Project implementation. c. Recruit additional qualified E&S specialists, if necessary, to ensure effective supervision and compliance with the E&S Standards in case E&S specialists can't be exclusively dedicated to the Project.	National Water and Electricity Company Ltd (NAWEC) Project Implementation Unit (PIU)

B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the following capacity building measures: A capacity-building plan shall be included in each specific E&S instrument that requires capacity-building measures, including the ESIA/ESMPs, site-specific ESMPs, C-ESMPs, LMP-related provisions, SEP/GM arrangements, SEA/SH Action Plan, and other relevant instruments prepared for Project activities. The plan shall identify the target groups, training topics, delivery schedule, responsible parties, and resources required. Training shall be provided to the PIU, Project workers, contractors, supervising firms, and other relevant implementing partners to ensure that the Project is carried out in accordance with this ESCP and the ESSs. Training shall be prepared and delivered in accordance with the capacity-building plan contained in the relevant instrument for the activity concerned, including the ESIA/ESMPs, site-specific ESMPs or C-ESMPs, as applicable, and shall cover the following: 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 Trainings topics: ✓ The World Bank Environmental and Social Framework (ESF) ✓ Geo-Enabling initiative for Monitoring and Supervision (GEMS) ✓ Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP) implementation ✓ Grievance Mechanism (GM) ✓ Workers and community health and safety including road safety and Incidents Reporting requirements ✓ Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)/ Violence against children (VAC) risk awareness; SEA/SH Prevention and Response Action Plan, including CoCs ✓ Implementation of Labor Management Procedures (LMP) including workers GM	Prepare the capacity-building plan as part of each specific E&S instrument that requires such measures, including the ESIA/ESMPs, site-specific ESMPs and C-ESMPs, as applicable, prior to the commencement of the relevant activity, and thereafter implement the plan throughout Project implementation. Prior to working on site and regular intervals during implementation	NAWEC/PIU
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Target Group: Suppliers/Contractors/Sub-contractors/Workers on site Trainings topics: ✓ Occupational health and safety including incident and accidents reporting, preparedness and response arrangements to emergency situations ✓ LMP including workers GM and CoCs ✓ Risks of GBV/SEA/SH awareness, SEA/SH Prevention and Response Action Plan ✓ World Bank ESSs and ESMP implementation		
MONITORING AND REPORTING			
C	REGULAR REPORTING 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: • 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 Project GM and the workers' GM, the grievance logs, 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 DoF 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.	NAWEC/PIU
D	CONTRACTORS' MONTHLY REPORTS		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	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.	Submit the monthly reports to the Association upon request or as annexes to the reports to be submitted under action C above.	NAWEC/PIU
E	INCIDENTS AND ACCIDENTS 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 SEA/SH; or disease outbreaks. Provide available details of the incident or accident to the Association upon request. 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.	Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request. 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.	NAWEC/PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS 1. Finalize and implement an Environmental and Social Impact Assessment (ESIAs) for the Kotu Fecal Sludge Treatment Plant (FSTP) and Wastewater Treatment Plant (WWTP) rehabilitation, and corresponding Environmental and Social Management Plan (ESMP), consistent with the relevant ESSs. 2. Prepare and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for other activities that require the preparation of the ESIA/ESMP, consistent with the relevant ESSs. 3. Require Contractors to prepare and implement C-ESMP, consistent with the relevant ESSs.	1. Finalize the ESIAs for the FSTP and the WWTP and corresponding ESMPs and incorporate relevant aspects of the ESMPs as part of the respective bidding documents prior to the start of activities. Once finalized, implement the ESIAs and ESMPs throughout Project implementation. 2. Prepare the ESIA and ESMP prior to the commencement of the activity that requires the preparation of the ESIA/ESMP and thereafter implement the ESIA and ESMP throughout Project implementation.	NAWEC/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		3. Require contractors to prepare C-ESMPs prior to the start of works and thereafter implement them throughout implementation period of the respective works.	
1.2	MANAGEMENT OF CONTRACTORS 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.	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.	NAWEC/PIU
1.3	TECHNICAL ASSISTANCE Carry out the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project, including, 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 output of such activities in compliance with the terms of reference.	Throughout Project implementation.	NAWEC/PIU
1.4	CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC) FINANCING 1. Ensure that the CERC Manual includes a description of the E&S assessment and management arrangements for the implementation of the CERC Part, in accordance with the ESSs. 2. If the CERC is activated, prepare, consult upon, adopt, disclose and implement any E&S instruments required for the relevant CERC activities, in accordance with the CERC Manual, the Emergency Action Plan, this ESCP and the ESSs.	1. The adoption of the CERC Manual, Emergency Action Plan and any relevant E&S documents, in form and substance acceptable to the Association, is a withdrawal condition for Emergency Expenditures under the relevant section of the Financing Agreement. 2. Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case before carrying out the relevant CERC activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms throughout	The designated authority for the CERC and the Ministry of Finances

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		implementation of the relevant CERC activities.	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES		NAWEC/PIU
	1. The Recipient shall ensure that labor management and working conditions for all Project workers are consistent with this ESCP, and with the Recipient's labor framework, including the Labour Act 2023, Children's Act 2005, Women's Act 2010 and related national, departmental or local implementing institutions, laws, regulations and procedures, supplemented by the gap-filling measures set out below to address Project-specific labor risks. 2. The Recipient shall promptly notify the Association of any changes to the labor framework that may materially adversely affect the 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 Association determines that these changes negatively affect ESS2 risk management aspects of the Project, the Recipient shall agree to implement additional measures and actions to address them in a manner acceptable to the Association. The ESCP shall be updated to reflect such agreed actions. 3. Labor-related requirements and compliance monitoring shall be incorporated into the Project Implementation Manual (PIM), including labor management provisions for all categories of Project workers, project-level workers' grievance mechanism procedures, provisions applicable to civil servants, age verification measures, OHS requirements, SEA/SH-sensitive complaint-handling and referral procedures, contractor management arrangements, and reporting requirements. 4. The Recipient shall ensure that all bidding documents and contracts include the relevant labor requirements, including terms and conditions of employment, non-discrimination and equal opportunity, prohibition of child labor and forced labor, OHS requirements, accident/incident notification, investigation and corrective actions, workers' GM requirements, and Codes of Conduct with clear definitions and prohibitions of SEA/SH. Workers, contractors and subcontractors shall sign and comply with the Code of Conduct as a condition of engagement. Where Project workers are civil servants, the PIM and relevant ESMPs shall include specific labor grievance and SEA/SH complaint procedures applicable to civil servants, given that the Labour Act does not apply to this category of workers.	1. Throughout Project implementation. 2. Notify the Association immediately after taking notice of the change to the Recipient's labor framework. Subsequent actions, if requested by the Association, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP. 3. Prepare and adopt the Project Implementation Manual (PIM) with the relevant E&S section, and disclose the relevant E&S section, all in accordance with the timeframe and requirements set out in the Financing Agreement. 4. The Recipient shall make sure all these requirements are incorporated in the bidding documents and ensure that during implementation this is well monitored and reported to the Association in the quarterly reports.	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	5. The PIU shall submit quarterly ESS2 compliance information as part of regular E&S reporting, including OHS incidents and corrective actions, status of age verification mechanisms, workers' grievances and resolutions, contractor compliance with labor and OHS requirements, implementation of Codes of Conduct, and coordination with the Department of Labour, Labor Inspectorate and Ombudsman.	5. Submit quarterly reports throughout Project implementation in accordance with Section C above, unless a different timeframe is agreed with the Association in writing.	
2.2	OCCUPATIONAL HEALTH AND SAFETY MEASURES 1. Prepare and implement occupational health and safety measures, proportionate to the relevant risks of the Project and consistent with applicable national requirements and GIIP. Such measures shall address, among others, civil works hazards, machinery and equipment use, excavation risks, confined-space risks, exposure to hazardous materials and wastewater, use and quality of personal protective equipment, emergency preparedness and response, incident and accident reporting, corrective actions, and supervision of contractors and subcontractors. 2. Require contractors and subcontractors to prepare, include and implement OHS measures in their C-ESMPs, consistent with the ESMPs prepared under action 1.1, contractual E&S requirements, and relevant national occupational health and safety standards. Contractors shall submit health and safety plans to the PIU, and where applicable to the NEA and Department of Labour, before commencement of works. 3. The PIU shall monitor implementation of OHS measures through contractor reporting, supervision arrangements, site inspections, and regular E&S reporting to the Association, including documentation of incidents, root-cause analysis and corrective actions.	Prepare and include OHS measures in the relevant ESMPs and C-ESMPs prior to commencement of works and implement them throughout Project implementation.	NAWEC/PIU
2.3	WORKERS' GRIEVANCE MECHANISM 1. The Recipient shall establish, maintain and operate a project-level workers' grievance mechanism as a readily accessible first point of call for all categories of Project workers, aligned with country systems and coordinated, as relevant, with the Labor Inspectorate, Department of Labour and 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-	1. The workers' GM shall be maintained and operated throughout Project implementation.	NAWEC/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	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. - All Project workers, including direct workers, contracted workers, community workers if any, primary supply workers where relevant, and civil servants involved as Project workers, shall be informed of the workers' GM and trained on its use, including SEA/SH reporting pathways and survivor-centered protocols, prior to commencing work or signing recruitment or engagement contracts. - For civil servants involved in Project activities, the workers' GM shall provide a safe and accessible pathway for labor-related concerns and SEA/SH complaints, including coordination with the Ombudsman and other competent national entities, without interfering with legally applicable public service procedures. - The PIU shall coordinate with the Department of Labour, Labor Inspectorate and Ombudsman to support monitoring, inspection, grievance referral, SEA/SH-sensitive complaint handling, and capacity building related to ESS2 implementation. - The requirement to maintain, publicize, monitor and report on the workers' GM, including SEA/SH-sensitive channels and referral pathways, shall be included in the PIM. Adequate budget for operation, monitoring, awareness raising and enforcement shall be included in the work plan and annual budget. The PIU is responsible for documenting and following up on all Project-related grievances, including SEA/SH cases, and for keeping the Association informed of cases and updates as part of regular reporting.	prior to commencing work or signing recruitment or engagement contracts Throughout Project implementation	
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 ESIA/ESMP prepared for relevant Project activities, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Prepare the WMP as part of any specific instruments (ESIAs/ESMPs) and contractors ESMPs and thereafter implement the WMP throughout Project implementation.	NAWEC/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.	1. Same timeframe as for the preparation and implementation of the ESMP	NAWEC/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Develop a detailed water balance (covering groundwater, coastal and deep aquifers and surface water resources), as part of the ESIA, consistent with ESS3.	2. Same timeframe as for the preparation and implementation of the ESIA.	
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.	NAWEC/PIU
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage community health and safety risks and impacts arising from Project activities, given the physical footprint of works, proximity to densely populated and vulnerable communities, and potential routine and non-routine risks. These risks include, inter alia, community exposure to construction hazards, increased traffic and road safety risks, potential contamination of water sources, disease transmission, labor influx, emergency situations, and risks associated with worker-community interaction. Incorporate proportionate mitigation measures in the relevant ESMPs, site-specific ESMPs and C-ESMPs, including community health and safety provisions, traffic and road safety measures, emergency preparedness and response arrangements, worker behavior controls, Codes of Conduct, and measures to prevent and respond to SEA/SH.	Same timeframe as for the preparation and implementation of the ESMPs.	NAWEC/PIU
4.3	SEA AND SH RISKS Prepare and implement a SEA/SH Action Plan as part of the relevant ESMPs for activities involving workers and community interface. The SEA/SH measures shall be embedded in the relevant ESMPs, site-specific ESMPs and C-ESMPs, including survivor-centered response procedures, referral pathways, worker Codes of Conduct, awareness raising, monitoring and reporting arrangements.	Same timeframe as for the preparation and implementation of the ESMPs.	NAWEC/PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT FRAMEWORK 1. Prepare, consult upon, disclose and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5. 2. Once the locations, designs and footprint of Project activities are known, carry out E&S screening and prepare, consult upon, disclose and implement site-specific Resettlement	1. The draft RPF was prepared and disclosed on August 13, 2026. Finalize, consult upon, and disclose the final RPF no later than three months after the Effective Date, and thereafter implement it throughout Project implementation. 2. For each activity once the site, design and footprint are defined, carry out E&S	NAWEC/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Plans (RAPs) and/or Livelihood Restoration Plans (LRPs), as required, consistent with ESS5 and the RPF. 3. Appoint a qualified Facilitation Firm, as needed, to support inclusive RAP/LRP implementation, PAP engagement and assistance, grievance coordination, and livelihood restoration follow-up, with terms of reference and qualifications acceptable to the Association.	screening and prepare, consult upon, disclose and implement site-specific RAPs and/or LRPs, as required, prior to the commencement of relevant works , including ensuring that before taking possession of the land and related assets, full compensation has been provided and, as applicable, displaced people have been resettled and moving allowances have been provided. 3. If needed two months after the RAP/LRP disclosure.	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS 1. Carry out a critical habitat assessment (CHA) and screen the Project activities in accordance with the CHA outcomes and ESS6. Accordingly, define, prepare, and adopt the relevant mitigation measures prior to the commencement of the relevant activities in accordance with the mitigation hierarchy approach, and consistent with ESS6.	Carry out a CHA prior to the start of works. Screen Project activities in accordance with the CHA prior to undertaking them. Define, prepare and adopt the relevant mitigation measures prior to the commencement of the relevant activities and thereafter implement them throughout Project implementation.	NAWEC/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 1. Manage Project cultural heritage risks and impacts in accordance with ESS8, this ESCP and the Recipient's national cultural heritage framework including identification, protection, management and conservation of cultural heritage. Project-specific gap filling measures shall be applied, including NCAC participation, cultural heritage screening, chance finds procedures, and inclusion of cultural heritage provisions in ESMPs, C-ESMPs, bidding documents and contracts.	1. Throughout Project implementation. Include Project-specific cultural heritage measures in the relevant ESMPs, C-ESMPs, bidding documents and contracts prior to commencement of activities that may affect cultural heritage.	NAWEC/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. The Recipient shall promptly notify the Association of any changes to the national cultural heritage framework that could materially affect the management of Project cultural heritage risks and impacts consistent with ESS8. If such changes affect ESS8 risk management, the Recipient shall implement additional measures acceptable to the Association and update this ESCP accordingly. 3. Screen Project activities for known and potential cultural heritage risks and include applicable mitigation measures, NCAC involvement, chance finds procedures, and monitoring arrangements in the relevant ESMPs, C-ESMPs, bidding documents and contracts. 4. Where risks or adverse impacts on known cultural heritage are identified, prepare, consult, disclose and implement a Cultural Heritage Management Plan or equivalent measures as part of the relevant ESMP, consistent with ESS8 and the national cultural heritage framework.	2. Notify the Association immediately after becoming aware of changes to the national cultural heritage framework. Implement any additional measures agreed with the Association and update the ESCP accordingly. 3. Same timeframe as the preparation and implementation of the relevant site-specific ESMPs and C-ESMPs. 4. Prepare and implement any Cultural Heritage Management Plan or equivalent measures prior to commencement of activities that may affect known cultural heritage, and thereafter throughout the relevant activity.	
8.2	CHANCE FINDS - Develop a Chance Finds Procedure (CFP) 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: - Require immediate cessation of work within the discovery area. - Secure the site and prevent further disturbance. - Notify the competent authority (e.g., NCAC) and the PIU within 24 hours, and the Association within 48 hours. - 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. - Specify decision-making timelines to minimize delays and ensure a safe, respectful, and legally compliant response. - 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 PIM and the site specific ESIA/ESMP - The CFP shall be maintained and enforced throughout Project implementation, with all chance finds recorded and reported in quarterly E&S reports.	- Same timeframe as the site specific ESIA/ESMP and implement the procedures throughout Project implementation. - Training on the CFP prior to mobilization - Same timeframe for the preparation and implementation of the PIM and site-specific ESIA/ESMPs respectively - Submit quarterly reports throughout Project implementation in accordance with Section C above, unless a different timeframe is agreed with the Association in writing.	NAWEC/PIU
ESS 9: FINANCIAL INTERMEDIARIES: This Standard is not relevant			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN 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. Implement the SEP throughout Project implementation and update/re-disclose it as needed to reflect changes in Project activities and sequencing.	The Stakeholder Engagement Plan (SEP) was publicly disclosed on May 7, 2026, and shall be implemented throughout Project implementation. The SEP shall be updated and re-disclosed as needed to reflect changes in Project activities and sequencing.	NAWEC/PIU
10.2	PROJECT GRIEVANCE MECHANISM (GM) Establish, publicize, maintain, and operate an accessible Project Grievance Mechanism (Project GM) 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. The Project 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. Ensure Project GM channels and indicative service standards described in the SEP are operational throughout Project implementation, including multiple channels such as hotline/SMS, email, letters and walk-ins, and acknowledgement and resolution timeframes as described in the SEP.	The PIU already has an established and functional grievance mechanism that NAWEC shall update no later than three (3) months after the Effective Date and thereafter shall maintain and operate the mechanism throughout Project implementation.	NAWEC/PIU
10.3	SEA/SH-SENSITIVE GM PROCEDURES OPERATIONALIZATION 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).	Prior to commencement of activities involving workers and community interface; thereafter throughout Project implementation.	NAWEC/PIU
10.4	STAKEHOLDER ENGAGEMENT ON SECTOR REFORMS Carry out ongoing stakeholder engagement and information disclosure on sector reform activities supported under the Project, including institutional restructuring and tariff-	Throughout implementation of reform activities.	NAWEC/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	related measures, through SEP mechanisms, including consultations, disclosure, feedback and the Project GM, consistent with ESS10.		
10.5	GM REPORTING (ESS10) Include in regular E&S reporting a summary of Project GM performance, including number and types of grievances received and resolved, resolution timeframes, and SEA/SH cases reported in non-identifying form, consistent with SEP monitoring indicators.	Quarterly (as part of Action C reporting) throughout Project implementation.	NAWEC/PIU
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: ✓ Maintenance of E&S risk management unit in the PIU with an Environmental and Social Specialists already recruited with planned additional hiring if necessary. ✓ Memorandums of Understanding: The PIU will be signing MoUs with the NEA, NCAC, DoL and DoF to ensure proper coordination of E&S risk management trees replanting activities. ✓ Environmental and Social Impact Assessment (ESIA) for the construction of the WTP in Brikama East ✓ Initial Environmental Assessments for the construction of the WTP in Brikama East ✓ Site-specific ESMPs and other E&S risk management instruments prepared, consulted and disclosed prior to start of the relevant activities. ✓ SEP prepared, consulted upon and publicly disclosed on May 7, 2026; to be implemented throughout Project implementation and updated/re-disclosed as needed. ✓ RPF draft disclosed on August 13, 2026; final RPF to be finalized, consulted upon and disclosed no later than three months after the Effective Date, consistent with Section 5.1. The RPF is not an effectiveness condition. Site-specific RAPs/LRPs shall be prepared, consulted upon, disclosed and implemented, as required, prior to the commencement of relevant works and before any land acquisition, restrictions on land use, displacement, or taking possession of land and related assets.			