

REPUBLIC OF THE GAMBIA

Ministry of Finance and Economic Affairs

**The Gambia Public Administration
Modernization Project (P176924)**

Final For Appraisal

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

May 31, 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (the Recipient) will implement the Gambia Public Administration Modernization Project (the Project), with the involvement of the Ministry of Finance and Economic Affairs (MoFEA), Ministry of the Public Service, Administrative Reform, Policy Coordination and Delivery, Gambia Revenue Authority, Directorate of Tax Policy, the Accountant General's Department, Internal Audit Department, National Audit Office, and Ministry of Basic and Secondary Education as set out in the Financing Agreement and the Project Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreement(s).
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 Financing Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
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, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of Finance and Economic Affairs and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient through the Permanent Secretary, Ministry of Finance and Economic Affairs. The Recipient/The current PIU of the Fiscal Management Development Project (FMDP) (P166695) shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	REGULAR REPORTING Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s) including those related to GBV/SEA/ SH and Project workers and the SEA/SH Prevention and Response Action Plan, SEP and LMP.	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 10 days after the end of each reporting period.	<i>The current PIU of the Fiscal Management Development Project (FMDP) PIU</i>
B	INCIDENTS AND ACCIDENTS Promptly notify the Association of any incident or accident related 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, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury . Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.	Notify the Association no later than 48 hours after learning of the incident or accident and 24 hours for any fatalities or incidents related to SEA/SH. Provide subsequent report to the Association within seven (7) days following the incident to the Association	PIU
C	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on ESHS 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 as annexes to the reports to be submitted under action A above throughout the implementation of the project.	PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE Maintain the current Project Implementation Unit (PIU) of the Fiscal Management Development Project (FMDP) (P166695), with qualified staff and resources to support management of ESHS risks and impacts of the Project including one environmental and social development consultant to be recruited and used on a part time, whose tasks will include gender considerations, and a Gender Based Violence (GBV) consultant, and whose qualifications shall be submitted to the Association for No objection to support management of ESHS risks and impacts of the project.	Maintain the FMDP PIU as set out in the financial agreement. Recruit and appoint on a part-time basis the environmental and social development specialist consultant, no later than three (3) months after Project Effective Date and thereafter maintain this position throughout Project	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		implementation. A GBV consultant will be hired on a need based during project implementation	
1.2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS 1. Adopt and implement Environmental and Social risks management measures consistent with the relevant ESSs in the Project Operational Manuel. 2. . Adopt and implement the Environmental and Social Management Plans (ESMPs) if applicable., as per the environmental and social screening report.	1. Same timeframe as for the preparation of the POM, and thereafter implement measures throughout Project implementation. 2. Adopt and implement the ESMP before launching the bidding process for the respective subproject/Project activity]prior to the carrying out of subproject/Project activity that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation.	PIU
1.3	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.	PIU
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project , including, inter alia, the stakeholders Engagement plan and the Labor management procedures are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.	Throughout Project implementation.	PIU
1.5	CONTINGENT EMERGENCY RESPONSE FINANCING a)) Ensure that the Emergency Response Manual (ERM) as specified the legal agreement includes a description of the ESHS assessment and management arrangements including	a)) The adoption of the ERM in form and substance acceptable to the Association is a withdrawal condition	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>the CERC- Addendum that will be included or referred to in the ERM for the implementation of the CERC Part, in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&S) instruments which may be required for activities under CERC Part of the Project, in accordance with the ERM and, if applicable, CERC-ESMF 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>	<p>under Section [XX] of Schedule 2 of the Financing Agreement] for the Project.</p> <p>b) Submit the respective E&S instrument for the Association's prior review prior and approval 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>	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement Labor Management Procedures (LMP) for the Project as part the project operational manual (POM), including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety including emergency preparedness and response, code of conduct including relating to SEA and SH, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Same timeframe as for the adoption of the POM, and thereafter implement the LMP throughout Project implementation.	PIU
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT –Not currently relevant			
3.1	Adopt and implement e-Waste Management Plan(WMP), to manage e-waste as part of the POM , consistent with ESS3.	Same timeframe as for the adoption of the POM, and thereafter implement the WMP throughout Project implementation].	PIU
ESS 4: COMMUNITY HEALTH AND SAFETY – Not relevant			
4.1	COMMUNITY HEALTH AND SAFETY	Same timeframe as for the adoption of the POM, and thereafter implement the	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Assess and manage specific risks and impacts to the safety of community arising from Project the management of e-waste, and include mitigation measures in the POM in accordance with ESS4	mitigation measures throughout Project implementation].	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
Not relevant			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Not relevant			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES-			
Not relevant			
ESS 8: CULTURAL HERITAGE –			
Not relevant			
ESS 9: FINANCIAL INTERMEDIARIES-			
Not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	Adopt 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.	Adopt the SEP prior to Appraisal, and thereafter implement the SEP throughout Project implementation	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>	Establish the grievance mechanism including a GM to facilitate the resolution of SEA/SH as part of the SEP that will be up and running within 3 months of project approval.	PIU
CAPACITY SUPPORT			
CS1	<p>Training to be provided</p> <p>Target Group: PIU staff, staff of implementing partners</p>	From the first year of project effectiveness and throughout project	PIU Association

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Topics: <ul style="list-style-type: none"> -Stakeholder mapping and engagement -The World Bank Environmental and Social Framework (ESF) -Gambian laws relating to social and environmental protection -Labor Management Procedures - SEA/SH risk mitigation - Implementing and monitoring GM (including SEA/SH GM process) 	<i>implementation</i>	Consultants
CS2	Target group: Project Workers (Suppliers/Contractors) Topics <ul style="list-style-type: none"> - --Occupational Health and Safety, including on the prevention of emergencies, and how to prepare for and respond to such situations, including risks related to COVID-19; STDs and HIV/AIDS -Labor Management Procedures including workers GM -SEA/SH Grievance Redress Mechanism -Grievance registration and processing procedure -Workers Grievance Mechanism -Waste management 	<i>From the first year of project effectiveness and throughout project implementation</i>	PIU, Contractors and consultants