

REPUBLIC OF THE GAMBIA

Ministry of Tourism and Culture

**Tourism Recovery, Diversification,
and Resilience in The Gambia Project
(P177179)**

Draft for Appraisal

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

March 27, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (the Recipient) will implement The Gambia Tourism Recovery, Diversification and Resilience Project (the Project), with the involvement of the Ministry of Tourism and Culture, the Ministry of Finance and Economic Affairs and the Gambia Tourism Board, The Gambia Tourism Board (GTB), The Ministry of Environment, Climate Change and Natural Resources, Ministry of Lands, Regional Government and Religious Affairs, and The Gambia Chamber of Commerce as set out in the Financing Agreement. The International Development Association (the Association), has agreed to provide the 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. 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 Tourism and Culture, and the Association 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 Tourism and Culture. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>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), Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAPs) and the SEA/SH Prevention and Response Action Plan.</p>	<p>Submit quarterly reports to the Association throughout Project implementation, commencing three months after the Effective Date. Submit each ESHS report to the Association no later than 10 days after the end of each reporting period.</p>	<p><i>Project Implementation Unit (PIU)</i></p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>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, incidents or accidents on project sites, conflicts related to land and natural resource use changes/restrictions, labour influx, cases of exclusion of vulnerable groups (women, youth, people with disabilities) 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.</p> <p>Notification of SEA/SH incidents shall follow the information sharing protocol to respect the safety and confidentiality of the survivor, as set out in the SEA/SH Prevention and Response Action Plan.</p> <p>Subsequently, at the Association’s request, the Recipient shall prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>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.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association</p>	<p><i>PIU</i></p>
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>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.</p>	<p>Submit the monthly reports to the Association. as annexes to the reports to be submitted under action A above.</p>	<ul style="list-style-type: none"> • <i>PIU</i> • <i>Supervising engineers</i> • <i>Contractors</i> • <i>Subcontractors</i>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a PIU with qualified staff and resources to support management of ESHS risks and impacts of the Project which includes one environmental risk management specialist, one social risk management specialist, one GBV specialist, one Occupational Health and Safety (OHS) consultant, and one Stakeholder Engagement/Communications consultant whose qualifications shall be submitted to the Bank for No Objection.</p>	<p>Establish and maintain a PIU as set out in the legal agreement. One environmental risk management specialist, a social risk management specialist, a GBV specialist, the OHS consultant and Stakeholder Engagement/Communications Consultant shall be hired no later than two (02) months after Project Effective Date, and thereafter maintained throughout Project implementation.</p>	<p><i>PIU</i></p>
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Prepare, consult, adopt, disclose, and thereafter implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) of specific investments when the intervention sites are known consistent with the relevant ESSs.</p> <p>2. Prepare, consult, adopt, and thereafter implement an Environmental and Social Management Framework (ESMF) for the Project consistent with the relevant ESSs with SEA/SH risks assessed and addressed through the SEA/SH Prevention and Response Action Plan annexed to ESMF.</p> <p>3. Screen any proposed subproject/ Project activity in accordance with the ESMF adopted for the Project and, thereafter, the PIU shall prepare, consult, adopt, disclose, and thereafter implement the subproject’s site-specific instrument (Environmental and Social Impact Assessment (ESIA/Environmental and Social Management Plan (ESMP), Resettlement Action Plans (RAP) as set out in the ESMF. The proposed subprojects described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p>	<p>1. Submit the respective ESIA/ESMPs for the Association's prior review and no objection and adopt and disclose them before launching the bidding process for respective subproject/project activity. Once adopted, implement the respective ESMP throughout Project implementation.</p> <p>2. Adopt the ESMF prior to Appraisal, and thereafter implement the ESMF throughout Project implementation.</p> <p>3. Adopt the ESMP before launching the bidding process for the respective Project activity prior to the carrying out the activity that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation.</p>	<p><i>PIU</i></p>
1.3	<p>MANAGEMENT OF CONTRACTORS</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.</p>	<ul style="list-style-type: none"> • <i>PIU</i> • <i>Supervising engineers</i> • <i>Contractors, subcontractors</i>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, SEA/SH Action Plan, 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.</p> <p>Cause all contractors and subcontractors to prepare and adopt and implement the contractor Environmental and Social Management Plan (C-ESMP), as set out in the ESMF.</p>	<p>Adopt the C-ESMP for the respective Project activity prior to the carrying out of Project activity that requires the adoption of such C-ESMP. Once adopted, implement the respective C-ESMP throughout contract implementation.</p>	
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project specify the environmental and social instruments to be supported under the TA 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.</p>	<p>The technical assistance activities are carried out consistent with the ESSs throughout Project implementation.</p>	<p>PIU</p>
1.5	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>a) Ensure that the CERC Manual (CM) as specified the legal agreement includes a description of the ESHS assessment and management arrangements including the CERC-ESMF/ESMF 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) 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 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>	<p>a) The adoption of the CM in form and substance acceptable to the Association is a withdrawal condition under Section D 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>	<p>PIU</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p>	<p>Disclose the LMP prior to Appraisal and thereafter implement the LMP throughout Project implementation.</p>	<ul style="list-style-type: none"> • PIU • Contractors • Subcontractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare, consult, adopt, disclose and implement the Labor Management Procedures (LMP) for the Project, 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.		
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>The Recipient shall establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	<ul style="list-style-type: none"> • PIU • Contractors • Subcontractors
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare, consult, adopt disclose and implement a Waste Management Plan (WMP) to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Submit the WMP for the Association’s prior review and no objection, adopt, and disclose the WMP prior to Appraisal and thereafter implement the WMP throughout Project implementation.	<ul style="list-style-type: none"> • PIU • Contractors • Subcontractors
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 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESMPs and C-ESMP.	<ul style="list-style-type: none"> • PIU • Contractors • Subcontractors
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Adopt and implement measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESIA/ESMP, as well as C-ESMPs	<ul style="list-style-type: none"> • PIU • Contractors • Subcontractors
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>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 in accordance with the ESMF.</p>	Same timeframe as for the adoption and implementation of the ESMP.	PIU
4.3	<p>SEA AND SH RISKS</p> <p>Adopt and manage specific risks and impacts to the community arising from Project activities. Develop a SEA/SH Prevention and Response Action Plan with corresponding budget as part of the ESMP to assess and manage the risks of SEA and SH.</p>	Same time frame as the ESIA/ESMP in section 1.2 and thereafter implement the SEA/SH Action Plan throughout Project implementation.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the ESMF/ESIA, C-ESMP, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	Same timeline as for the preparation of the ESMF/ESIA, C-ESMP and Prior to engaging security personnel and thereafter implemented throughout Project implementation].	PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p>	Adopt, and disclose the updated RPF prior to Appraisal, and thereafter implement the RPF throughout Project implementation.	PIU
5.2	<p>RESETTLEMENT PLANS</p> <p>Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, as set out in the RPF, and consistent with ESS5.</p>	Adopt, and disclose the RAP, and once adopted, implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and moving allowances have been provided.	PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Adopt and implement the Biodiversity Management measures, including the preparation of a Biodiversity Management Plan (if applicable) as set out in the ESMF and the site-specific ESIA/ESMPs all in accordance with ESS6.</p>	<p>Same timeline as for the preparation of the ESMF/ESIAs/ESMPs and thereafter implement them throughout Project implementation.</p> <p>Prepare and submit the BMP for the Association’s prior review and no objection, adopt and disclose the BMP prior to start any subproject/project for the activities which require such plan, and thereafter implement the BMP throughout Project implementation.</p>	PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
ESS7 is currently not relevant to the project as there are no known Indigenous peoples or communities in the project area(s) as per the criteria in ESS7.			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE MANAGEMENT PLAN</p>		PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ol style="list-style-type: none"> 1. Adopt and implement the Cultural Heritage Management Plan (CHMP) for the Kunta Kinteh Island and Related Sites World Heritage Site, as part of the site specific ESMP, in accordance with the guidelines of the ESIA prepared for the activity, and consistent with ESS8 and in accordance with national legislation. 2. Adopt and implement mitigation measures to manage cultural heritage as per site-specific ESMP and in accordance with the relevant ESIA, consistent with ESS8. 	<ol style="list-style-type: none"> 1. Sametime as for the preparation of the ESMF/ESIA/ESMPs 2. Adopt the CHMP to start any site work the require the preparation of such plan, and thereafter implement the CHMP throughout Project implementation. 	
8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance finds procedures as per the ESMF of the Project.</p>	Same timeline as ESMF and ESMPs Implement the procedures throughout Project implementation.	PIU
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	<p>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</p> <p>Not relevant.</p>		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare, consult, adopt, disclose, 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>	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 no later than three months after Project Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	PIU
CAPACITY SUPPORT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
CS1	<p>Training to be provided</p> <p>The PIU shall ensure that relevant project actors are trained in the following areas:</p> <ul style="list-style-type: none"> • The project’s GM, including the processes for handling sensitive complaints such as SEA/SH incidents • Stakeholder Engagement Plan and good practices related to engaging stakeholders in an ethical and responsive way • Labor Management Procedures including the worker GM • E&S requirements (impacts and mitigation measures) of sub-projects • Subproject Environmental and Social screening • Occupational Health and Safety • Biodiversity management • Cultural Heritage Management • Emergency preparedness and response • Communication strategy on COVID-19 and activities/protocols regarding prevention and mitigation of transmission, PPE, OHS • SEA/SH/VAC risk awareness; SEA/SH Prevention and Response Action Plan, content, and sanctions of CoCs, and GM of project (i.e., importance, objectives, content, how to prepare it, who implements it, and how to ensure a GM-sensitive SEA/SH issues • Disability inclusion training and training on inclusion of other vulnerable groups such as Retailers, Street vendors, artists/comedians, etc. (including women and youth associations/groups) • Documentation, monitoring and reporting • Gender inclusion action plan • Other (to be determined according to needs 	6-12 months after Effectiveness Date and during project implementation	PIU
CS2	<p>- Implementing partners and project workers to receive training on:</p> <ul style="list-style-type: none"> • Stakeholder Mapping and Engagement • Environmental and Social screening • Environment and social risk and impact management • SEA/SH risk management and GM • Labor Management Procedures and GM • Training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations, including Occupational Health and Safety, 	6-12 months after Effectiveness Date and during project implementation	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Community Health and Safety (i.e., including traffic and road safety, mitigation measures related to communicable diseases), COVID-19 mitigation; Codes of Conduct , Emergency preparedness and response (CERC), SEA/SH risks, reporting requirements		