

REPUBLIC OF THE GAMBIA



Ministry of Tourism and Culture

**TOURISM DIVERSIFICATION AND RESILIENCE IN THE
GAMBIA PROJECT (P177179)**

**Environmental and Social
Management Framework (ESMF)**

May 2022

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ABBREVIATIONS & ACRONYMS

| | |
|----------|---|
| AIDS | Acquired Immune Deficiency Syndrome |
| ASSERT | Association of Small – Scale Enterprises in Responsible Tourism |
| BP | Bank Policy (World Bank) |
| CBG | Central Bank Gambia |
| CBO | Community-Based Organization |
| CERC | Contingency Emergency Response Component |
| COVID-19 | Coronavirus Disease 2019 |
| CRR | Central River Region |
| DLS | Department of Lands and Surveys |
| DPPH | Department of Physical Planning and Housing |
| EIA | Environmental Impact Assessment |
| ESMF | Environmental and Social Management Framework |
| ESF | Environmental and Social Framework |
| ESIA | Environmental and Social Impact Assessment |
| ESS | Environmental and Social Standards |
| ESRC | Environmental and Social Risk Classification |
| FGD | Focus Group Discussion |
| GBA | Greater Banjul Area |
| GBV | Gender-Based Violence |
| GCCI | Gambia Chamber of Commerce and Industry |
| GIEPA | Gambia Investment and Export Promotion Agency |
| GM | Grievance Mechanism |
| GMRP | Gambia National River Park |
| GRC | Grievance Resolution Committee |
| GTB | Gambia Tourism Board |
| HIV | Human Immunodeficiency Virus |
| ISP | Independent Service Providers |
| KII | Key Informant Interview |
| LGA | Local Government Authorities |
| LRR | Lower River Region |
| MOFEA | Ministry of Finance and Economic Affairs |
| MOTC | Ministry of Tourism and Culture |
| MSME | Micro, Small and Medium Enterprises |
| NBR | North Bank Region |

| | |
|--------|--|
| NCAC | National Council of Arts and Culture |
| NEA | National Environment Agency |
| NESIA | Notice of Environmental & social Impact Assessment |
| NGO | Non- Governmental Organization |
| NRA | National Roads Authority |
| PAP | Project Affected Person(s) |
| PURA | Public Utilities Regulatory Authority |
| PDO | Project Development Objective |
| PF | Process Framework |
| PIM | Project Implementation Manual |
| PM | Project Management |
| RPF | Resettlement Policy Framework |
| SEA/SH | Sexual Exploitation and Abuse/Sexual Harassment |
| SEP | Stakeholder Engagement Plan |
| TDA | Tourism Development Area |
| STD | Sexually Transmitted Diseases |
| STI | Sexually Transmitted Infections |
| VAC | Violence Against Children |
| WB | World Bank |
| WBG | World Bank Group |
| WCR | West Coast Region |

EXECUTIVE SUMMARY

CONTEXT

The World Bank is financing the Tourism Diversification and Resilience in The Gambia Project (P177179) to be implemented by the Ministry of Tourism and Culture (MoTC). The Project Development Objective is to support/improve diversification and resilience of The Gambia tourism sector in selected destinations. The Project aims to improve the diversification and resilience of the Gambian tourism sector by strengthening institutional and policy frameworks, improving market linkages through technical assistance capabilities and access to funds for tourism related micro, small and medium-size enterprises (MSMEs), and building resilience through the strengthening of sustainable coastal infrastructure and rehabilitation of existing tourism sites.

The aim of the project is to enhance the investment climate, competitiveness, and sustainability of selected tourism destinations, to promote growth through private sector participation and jobs creation. This implies improving the sector's development framework, increasing the participation and value addition of tourism related Micro, Small and Medium Enterprises (MSMEs), and developing sector resilience with the restoration, upgrading, and preservation of critical tourism assets, as well as product diversification.

Specific activities related to destination development and improving MSME capabilities will be determined during implementation. Potential sites under consideration include: Abuko Reserve (Western River), River Gambia National Park (Kiang West) and Bijilo National Park (West Coast). Tourism is recognized as a key productive sector in the current National Development Plan (NDP) of The Gambia, and it is one of the main contributors to both Gross Domestic Product (GDP) and employment. The Government of The Gambia recognized tourism as a key productive sector in its current NDP. In addition to agriculture and fisheries, tourism is seen as one of the private sector engines for future growth, transformation, and job creation. However, for tourism to materialize its potential, the government has recognized the need to overcome the main challenges faced by the sector such as lack of destination recognition/attractiveness; dwindling product quality; undiversified products and source markets; limited air access and reliance on tour operators; security; climate change; environmental degradation; and a weak statistical base to timely and effectively inform policy decisions-making.

In addition to the challenges posed by the COVID-19 pandemic, both nationally and internationally, significant constraints in the enabling environment undermine the sector's competitiveness. First, the sector is heavily reliant on international tour operators (ITOs) and dependent on a few European markets, let alone the regional markets as well. ITOs bring roughly 70 percent of all tourists, over 65 percent of 2019 arrivals were from Europe and between 60 and 70 percent of arrivals happen from October to March. This trend has encouraged volume and low prices over quality and environmental sustainability. Second, marketing efforts have largely been led by ITOs since the capacity of the government to collect and use data to promote the destination is quite limited. Attracting new tourist segments/source markets and extending the tourist season will require the ability to deploy evidence-based strategic marketing. Third, there has not been a diversification in product offerings and tourist profiles with the beach—“Sun and Sand”, amongst other offerings packages, being the main attraction for about 80 percent of tourists visiting the country. Finally, public, and private sector coordination, as well as horizontal and vertical coordination within the public sector are limited. For any strategy to be successful, collaboration and coordination among government bodies and agencies, and the private sector is necessary. The country can benefit from past coordination experiences with different stakeholders, such as the establishment of the Marketing Committee by The Gambia Growth and Competitiveness Project, or the execution of the Public-Private Dialogue Mechanism (PPDM) by the Support to Tourism COVID-19 Recovery in The Gambia.

Developments in the Tourism Development Area (TDA) in the Greater Banjul Area (GBA) has contributed to domestic migration from poorer rural areas and foreign migration (mostly from nearby countries in West Africa) to Kotu and Kololi, and more recently Bijilo, and Brusubi (Kombo North) largely because of the proximity to the Atlantic Ocean and the possibility of accessing tourism-related employment opportunities. The Gambia is known as a popular and affordable tourist destination especially among European tourists, which are targeted by tourist operators, especially given its relative proximity. Though such a portrait has changed since, for a while, The Gambia is also known for sex tourism, in some cases, with tourists seeking relationships with Gambian men/women. Some workers in the hospitality sector (hotels, bars, restaurants, tour guides, etc.) are also vulnerable to sexual exploitation and abuse/sexual harassment (SEA/SH) in the workplace. While prostitution in The Gambia is illegal per its constitution and related laws, it often takes place on the beach, in bars and hotels facilities on the coast (primarily at the popular “Senegambia strip” and the coastal area around Kololi). In addition, the HIV-AIDS infection rate among those involved in sex work is high.¹

PROJECT DESCRIPTION

The World Bank is financing the **Tourism Diversification and Resilience in The Gambia Project** (P177179) to be implemented by the Ministry of Tourism and Culture (MoTC). The Project Development Objective is to support/improve diversification and resilience of The Gambia tourism sector in selected destinations. The Project aims to improve the diversification and resilience of the Gambian tourism sector by strengthening institutional and policy frameworks, improving market linkages through technical assistance capabilities and access to funds for tourism related micro, small and medium-size enterprises (MSMEs), and building resilience through the strengthening of sustainable coastal infrastructure and rehabilitation of existing tourism sites.

The Project Development Objective (PDO) is to support the diversification and climate resilience of the tourism sector in the selected destinations in the Gambia. It aims to enhance the investment climate, competitiveness, and sustainability of selected tourism destinations, to promote growth through private sector participation and jobs creation. This implies improving the sector’s development framework, increasing the participation and value addition of tourism related Micro, Small and Medium Enterprises (MSMEs), and developing sector resilience with the restoration, upgrading, and preservation of critical tourism assets, as well as product diversification. The project has four components as indicated in the table below.

Table 1: Review of the Four Components of the Project

| No. | Component | Cost (USD million) | Sub-Component |
|-----|--|--------------------|---|
| 1 | Support to the Tourism Ecosystem | 13.00 | Sub-Component 1A: Improved institutional capacity for data-driven planning, marketing, and branding |
| | | | Sub-Component 1B: Increase participation of MSME ² within the selected destinations |
| 2 | Infrastructure Support for the Diversification and | 50.00 | Sub-Component 2A: Protection, rehabilitation, and integrated management of coastal areas |

¹ UN AIDS. “Five questions about The HIV Response in The Gambia” (31 Oct. 2021) <https://www.unaids.org/en/resources/presscentre/featurestories/2021/october/five-questions-gambia>

² The 2019 – 2024 Gambia national policy for MSMEs defines any company which exists after 12 months of operation, with these variables; number of employees less than 49, assets less than \$100K, and turnover less than 200K. The suppliers of goods and services identified to have potential linkages to larger tourism firms such as hotels, and tour operators, are predominantly in the food and beverage sectors. Horticulture, meat, dairy, locally made fruit juices, local tea and oils, breweries and other beverages, seafood, poultry, cosmetics, apparel, art (including cultural entertainment) and crafts. Web platforms, and web-based delivery businesses, industry trade fairs, community and women agriculture business groups, locally manufactured furniture, are non- traditional sub-sectors identified to be potential suppliers.

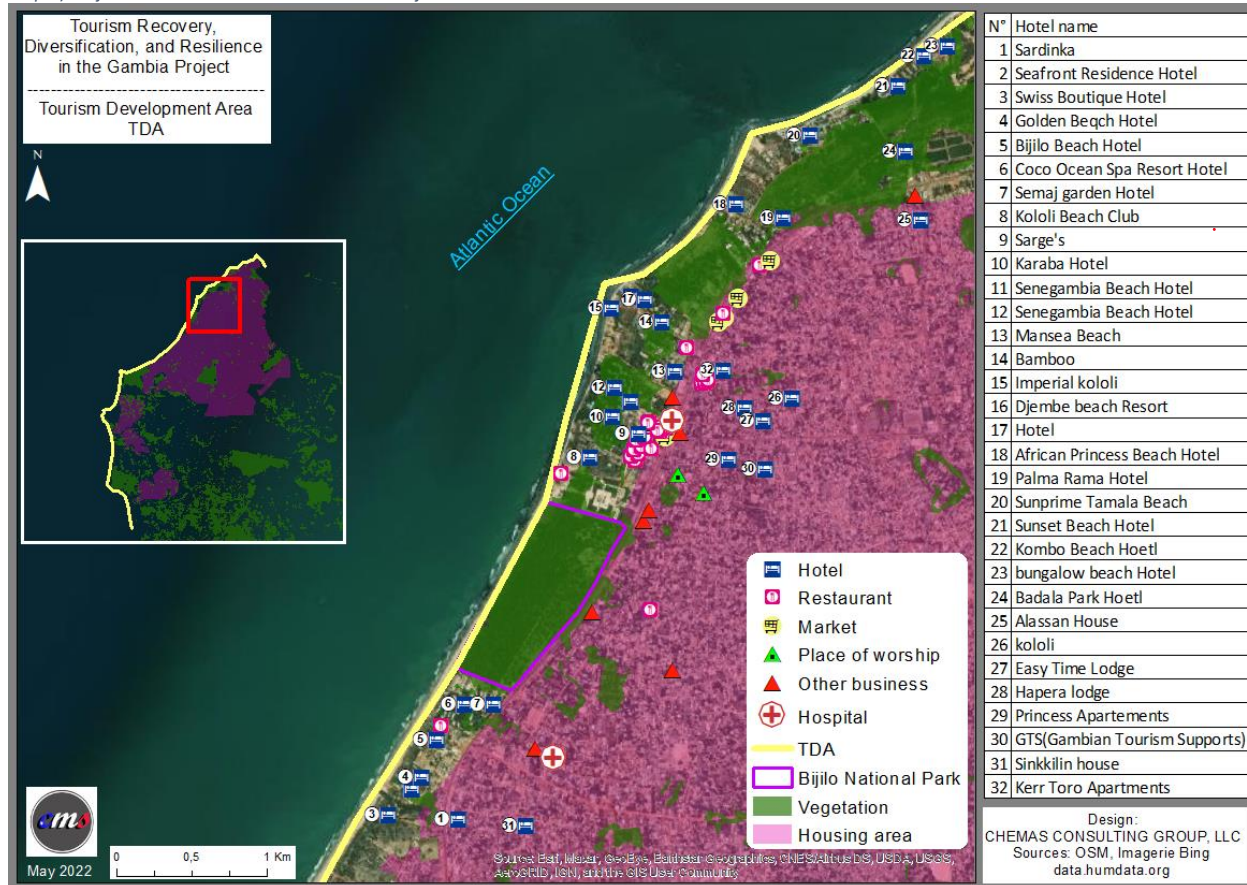
| | | | |
|---|---|------|--|
| | Resilience of the Tourism Sector | | Sub-Component 2B: Integrated Tourism Product Development and Diversification of selected TDA/tourism areas |
| 3 | Project Management, Monitoring and Evaluation | 5.00 | N/A |
| 4 | Contingent Emergency Response Component | 0 | N/A |

The 2019 – 2024 Gambia National Policy encourages MSMEs by putting incentives for companies which survive 12 months after creation and number of employees less than 49, assets less than \$100K, and turnover less than 200K. This project will prioritize working with those companies.

The project will contribute to increasing income in the tourist destinations and encourage the development of local tourism. There is a growing middle class that constitutes important potential clients for the tourism sector. This will increase the gross income of MSMEs and entrepreneurs (with a quota for women and young people) and increase the value of private investments mobilized in the tourism sector.

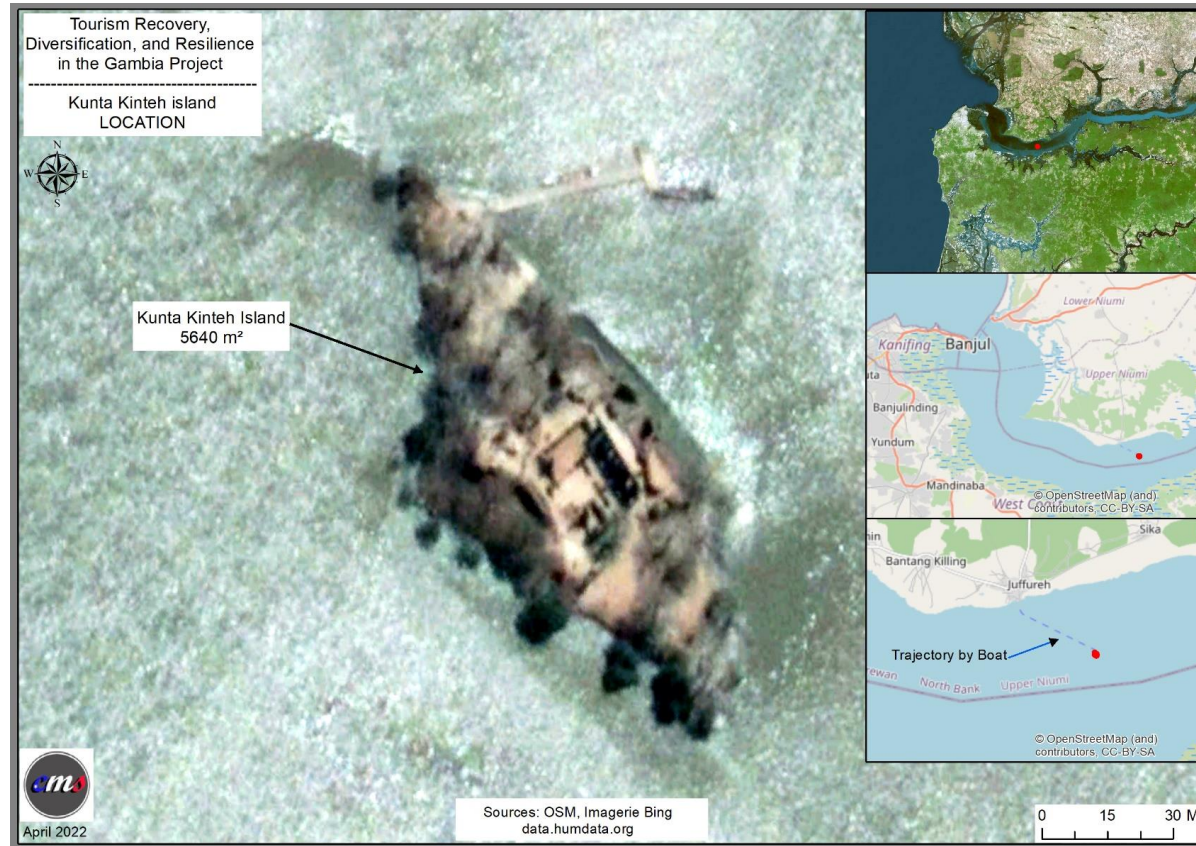
The project will be implemented in four of the five regions of The Gambia: West Coast Region, North Bank Region, Central River Region and Upper River Region. The two maps below (Map A and Map B) show the project area in The Gambia Tourism Diversification and Resilience Project.

Map A) Project intervention area in the Greater Banjul Area



Source: CHEMAS Consulting Group, LLC, Field mission, February 2022

Map B) Kunta Kinteh World Heritage site



Source: CHEMAS Consulting Group, LLC, Field mission, February 2022

RATIONALE OF THE ESMF

The ESMF sets out the procedures to ensure that the environmental and social risks and impacts associated with the implementation of the project activities are properly assessed, monitored, and managed throughout the project lifecycle. The ESMF will apply to the entire project including all activities funded under the Matching Grant scheme under component 1B set to be managed by a Managing Company (MC), and Component 2 (tourism infrastructure support). Furthermore, during implementation, once the technical designs and physical footprints of proposed sub-project activities are known, the ESMF screening form will be used for the screening of all activities which will inform subsequent preparation of site-specific S&E safeguards instruments. This will ensure that all potential risks and impacts of proposed activities are timely and thoroughly identified, assessed, evaluated, and managed, using the mitigation hierarchy, throughout the project lifespan.

Approach and Methodology for ESMF Preparation

The ESMF was prepared in accordance with the applicable national environmental and social regulations, the relevant World Bank ESSs, and the World Bank Group General Environmental, Health and Safety Guidelines (EHSGs)³ and involve the following activities:

- Literature/Document review
- Pre-mission virtual meeting with the client and the World Bank
- Field visits/consultations with relevant institutions and implementing partners

The following relevant documents were reviewed:

- Project Concept Note (PCN)
- The Project Appraisal Document (PAD)
- Project Procurement Documents (PPSD)
- Proposed project activities submitted by potential
- The World Bank Environmental and Social Framework and relevant World Bank Safeguard Policies that have not been replaced by the Environmental and Social Standards (ESSs), and the World Bank Group General Environmental, Health and Safety Guidelines
- Relevant key international conventions ratified by The Gambia
- Borrowers Guidance⁴ Notes of the ESS's from the World Bank and other guidance such as the World Bank Good Practice Notes such as Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works,⁵ non-discrimination and persons with disability⁶, managing labor influx,⁷ and gender⁸.

LEGAL AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL ASSESSMENTS

³ The guidelines for Environment, Health and Safety can be consulted at the following link: https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/EHS-Guidelines/

⁴ Guidance notes for Borrowers: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources#guidancenotes>

⁵ Good Practice Note Addressing Sexual Exploitation and Abuse and Sexual Harassment in the Financing of Investment Projects involving Major Civil Works : <http://pubdocs.worldbank.org/en/215761593706525660/ESF-GPN-SEASH-in-major-civil-works-English.pdf>

⁶ Good Practice Note for Non-discrimination and Disability : <http://pubdocs.worldbank.org/en/366051548972401439/ESF-Good-practice-note-disability-french.pdf>

⁷ Assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx <https://thedocs.worldbank.org/en/doc/fc074f5b6cc1621dc65675bf83c9d0b8-0290032021/original/ESF-Labor-Influx-Good-Practice-Note.pdf>

⁸ Good Practice Note for Gender <http://pubdocs.worldbank.org/en/158041571230608289/Good-Practice-Note-Gender.pdf>

Policies and laws relevant to the management of project's E&S risks and impacts were reviewed to develop this Environmental and Social Management Framework (ESMF), which will guide the project implementation process. The following is a select list of the relevant policy, legislation, and institutional procedures of The Gambia and those of the World Bank, which are relevant to the project. The full list is in chapter 1.1.6.

- The Constitution of the Republic of the Gambia (*adopted on 8 August 1996, entered into force in January 1997, last amended in 2000*)
- The Labor Act, 2007
- National Environmental Management Act 1994 and the Environmental Impact Assessment Regulations (EIAR) 2014
- The Gambia Environmental Action Plan (GEAP)
- The Biodiversity and Wildlife Policy (2001) The Biodiversity and Wildlife Act, 2002
- The Forestry Act (1998) and Forest Policy (2009-2019)
- The Land Acquisition and Compensation Act 1991 (LACA)
- The Sexual Offenses Act 2013
- Domestic Violence Act 2013
- Women's Act 2010
- Children's Act 2005
- National Policy Guidelines on HIV and AIDS, 2014 – 2020

The relevant World Bank Environmental and Social Standards are:

- ESS1 - Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 - Labor and Working Conditions
- ESS3 - Resource Efficiency and Pollution Prevention and Management
- ESS4 - Community Health and Safety
- ESS5 - Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement
- ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS8 - Cultural Heritage
- ESS10 - Stakeholder Engagement and Information Disclosure

POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS

According to the initial screening carried out during project preparation,⁹ the environmental and social risk classification (ESRC) is considered **Substantial**.

The **key environmental risks and impacts** relate to (i) risks to biodiversity loss in the event of civil works such as coastal protection and the construction/rehabilitation of access roads to the tourist sites, especially in some nature reserves like Abuko Nature Reserve and the River Gambia National Park as well as during operation; (ii) wildlife disturbance, (iii) soil pollution (ii) management of the disposal of waste from the rehabilitation/construction of the tourist sites; (iii) communities and workers' occupational health and safety, including the risks of exposure to communicable diseases such as COVID-19 and STIs; (iv) working conditions and employment; and (v) nuisances related to atmospheric emissions (air pollution during work) and noise, (v) fire risks and impacts; (v) water resources pollution and (vi) impacts on tangible cultural heritage.

⁹ The assessment is publicly available <https://policycommons.net/artifacts/2211139/concept-environmental-and-social-review-summary-esrs/2967912/>

Key social risks and impacts include (i) Planned activities such as coastal protection and the construction/rehabilitation of access roads to tourist sites can lead to risks of restriction of access to resources, especially in the forest parks, and the coastal areas; and exclusion and marginalization of vulnerable persons including persons with disabilities, women and/or youth-owned businesses during construction/rehabilitation of tourist sites; temporary or permanent livelihood loss risks for workers operating or working cultural/craft tourism kiosks and other tourism related small businesses. Others may be affected by the promotion of tourism MSMEs' sustainable integration into value chains with established end-markets because they may not have the required skills to integrate themselves into the new system and will need skills training. Such groups are local businesses led by women, youth, and elderly persons, informal and unemployed persons, persons with disabilities. Sex workers may also experience livelihood disruption due to physical works in tourist sites.

The project is planning to support the rehabilitation of existing tourism assets, such as the UNESCO World Heritage Site (WHS) of Kunta Kinteh Island and Related Sites. The site consists of a series of sites, in seven separate locations, associated with the early European occupation of the African continent: the whole of Kunta Kinteh Island, the remains of a Portuguese Chapel and of a colonial warehouse (CFAO Building) in the village of Albreda, the Maurel Frères Building in the village of Juffreh, the remains of the small Portuguese settlement of San Domingo, as well as Fort Bullen and the Six-Gun Battery. Fort Bullen and the Six-Gun Battery are at the mouth of the Gambia River, whilst Kunta Kinteh Island and the other sites are some 30 km upstream. Interventions in these areas may involve soil pollution (ii) management of the disposal of waste, occupational health and safety for workers, the tourists visiting these sites and communities living around the sites, working conditions and employment, including the risks of exposure to communicable diseases such as COVID-19 and STIs.

It is likely that cultural heritage could be encountered during the implementation of construction/rehabilitation activities. The ESMF assesses the probability of cultural heritage present in the project area including underwater heritage. The project intends to rehabilitate a handful of classified world heritage site such as the kunta Kinteh island and other sites like in Juffrey, in the Gambian national river Park, Bijilo and Abuko reserve, etc. Undertaking such activities would de facto require the preparation of a Cultural Heritage Management Action Plan (CHMAP). This will be further determined during implementation and once the physical footprints of the agreed upon historical structures to be rehabilitated/constructed are made available. The ESMF contains Chance Finds procedures which will be also included in the ESMPs and the CHMAP and subsequently in bidding documents and contracts to further guide the management of cultural heritage that may be encountered during civil works.

Site-specific ESIA or ESMPs for the subprojects will determine through consultations, the presence of cultural heritage and recommend measures to avoid doing harm to any identified cultural heritage in the project area, including archaeological relics, fossils, human graves, shrines, sacred trees or groves. ESMPs will include mitigation measures for managing any such finds and ensuring that there is no damage to cultural heritage, in accordance with the mitigation hierarchy.

The proposed mitigation measures are:

Environmental risk & impact mitigation measures

- Contractors should be instructed in their contracts to reduce air pollution by using well-maintained equipment.
- Comply with current applicable/enforced technical standards for the use of heavy equipment.
- Maintain equipment regularly to avoid excessive exhaust emissions.
- Reduce traffic speed to 30 km/h when crossing a community settlement. On all project sites, the speed limit will be 20 km/h.

- Construction workers should be provided with and required to use personal protection equipment (PPE) such as nose/face masks and eye goggles (Nose masks will be replaced daily, and eye goggles will be replaced quarterly).
- Regular watering of access roads, especially in dry weather/season by the Contractors to reduce dust emissions.
- Avoid known breeding and feeding habitats of valued or protected wildlife species.
- Properly follow UNESCO guidance on intervention and the Conservation Management Plan for the UNESCO World Heritage Sites and prepare a Cultural Heritage Management Plan either as part of the ESMPs, or when relevant as standalone, according to the results of the E&S screening process.
- Ensure that requirements to comply with national recommendations regarding the management of “chance finds” are included in all bidding documents.
- Reinforce the protection of rare or protected plant habitats and forests of interest.
- Limit the work to the right-of-way.
- Ensure a compensatory reforestation in case of important felling of trees, deforestation (i.e., two replacement trees for one felled tree) and involve the forestry services and riparian communities in the satisfactory and sustainable execution of this measure.
- Plan forest products recovery initiatives resulting from heavy deforestation and identify mechanisms for the rational distribution of products to the local population.
- Set up drums for the collection of used oil for possible recycling.
- Give preference to manual work (excavations, etc.).

Social risk mitigation

- Sensitization of the GM (including sensitive complaints)
- Establishment of a functional GM for the workers and the other stakeholders (including SEA/SH GM process which is confidential, ethical, and responsive, with confidential and ethical reporting and record keeping protocols)
- Regular consultation as per the SEP for the workers and affected communities
- Training of project workers in the Codes of Conduct
- Capacity building of the PIU, especially the E&S specialists
- Satisfactory Implementation of RAP or livelihood restoration plan
- Prohibiting sexual harassment in the workplace and requiring tourism employers to implement anti-harassment policies
- Have workers sign codes of conduct prohibiting sexual exploitation and abuse, and sexual harassment
- Implementation of the Labor Management Procedures

ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURE (ESMP)

❖ Sub-project activities’ environmental and social management screening process

The ESMF proposes an environmental and social screening process for all subprojects to be implemented under the project. The World Bank’s environmental and social risks and impacts classification rates projects into four categories such as: High Risk, Substantial Risk, Moderate Risk or Low Risk.

These sub-projects will follow a screening procedure to determine the nature and extent of their negative impacts, define appropriate mitigation and monitoring measures. This environmental and social screening, including institutional responsibilities, consists of 9 equally relevant steps:

| Step | Action | Responsible Entity | Timeframe |
|------|---|---|---|
| 1 | Completion of the environmental and social screening form (Annex 6) | PIU E&S risks and impacts management Team & NEA | During sub-projects (activities) preparation (before physical start of the activity) |
| 2 | Validation of the site screening and environmental and social classification of activities. Preparation and validation of TORs to develop the E&S risk mitigation instruments. | PIU Coordinator+ PIU E&S specialists + NEA & WB E&S Team | During sub-projects (activities) preparation (before physical start of the activity) |
| 3 | Carrying out the environmental and social work | Consultant (to be hired by PIU) | During sub-projects (activities) preparation (before physical start of the activity) |
| 4 | Review of the Environmental and Social Impact Assessment (ESIA) or site-specific ESMP reports, including public hearings and dissemination, and obtaining the environmental authorization from NEA and the No Objection from the World Bank | PIU Safeguards Team _ NEA Safeguards Team) WB E&S Document Review | Before the physical start of civil works. |
| 5 | Public consultation | PIU E&S team and Consultants | During the preparation of E&S instruments |
| 6 | Disclosure of the document | PIU and WB | After approval from NEA and No Objection from WB |
| 7 | Integration of environmental and social provisions in the bidding documents | PIU Safeguards Team | Very early during sub-projects (activities) preparation & 3/5 months before the physical start of civil works |
| 8 | Implementation of environmental and social measures | Contractors and all other stakeholders | Throughout the Implementation of the sub-project |
| 9 | Environmental and social monitoring and follow-up | PIU Safeguards Team | Throughout Implementation |

❖ **Addressing sexual exploitation and abuse (SEA) and sexual harassment (SH) risks**

The World Bank's "Good Practice Note for Addressing Sexual Exploitation and Abuse and Sexual Harassment in the Financing of Investment Projects involving Major Civil Works"¹⁰ assists the Borrower in identifying SEA/SH risks that can be exacerbated or can emerge in relation to project activities and/or civil works contracts and provides guidance on how to best manage such risks. A SEA/SH Prevention and Response Action Plan has been prepared (Annex 5). It will be linked to the project's grievance mechanism (GM) and will work in parallel to ensure the confidentiality and safety of SEA/SH survivors by ensuring accessible channels for reporting, referral to relevant, locally based, GBV service providers and to ensure access to medical, legal, and psychological care and the socio-economic reintegration of survivors while ensuring that their dignity is protected. The GM will have confidential, and survivor centered procedures to verify and manage SEA/SH complaints and to store related data. The SEA/SH Action Plan will also provide guidelines related to code of conduct, training and awareness raising activities and other actions judged necessary for the identified type and level of risks.

The Contractor's-ESMPs (C-ESMP) will also integrate specific action plans into their activities to mitigate and respond to risks and incidents.

¹⁰ See note 8 above.



❖ **Institutional arrangement for the execution of the environmental and social management procedure of the sub-projects**

Environmental and social risk management will be carried out by the Project Implementation Unit (PIU). It is responsible for the environmental, social, hygiene, health, and safety compliance of the Project, for obtaining the permits and authorizations required by the regulations, for preparing the quarterly monitoring reports and the completion report. It will include specialists in environmental and social risk management, a GBV Specialist, one OHS consultant, and one Stakeholder Engagement/Communications consultant, whose mandate will be to monitor and manage the E&S risks and impacts related to the implementation of the project and oversee implementation of the contractor's-ESMP.

In addition, the PIU reports to the steering committee, and ensures that the World Bank and other stakeholders receive all environmental and social monitoring and follow-up reports. In addition to the PIU, the implementation of the ESMF Project involves other actors, which includes contractors who must carry out the work in accordance with the provisions of the ESMF, ESIA/ESMP.

❖ **Stakeholders Capacity building**

To achieve this objective, the ESMF suggests institutional and technical support, training, and awareness-raising measures to strengthen the capacities of structures and human resources intervening in such cases. These include:

- Training on the World Bank's Environmental and Social Standards requirements
- Undertaking Environmental and Social Assessments, including environmental and social assessment procedure of sub-projects
- Training on monitoring and reporting environmental and social risks and impacts of sub-projects
- Training in the implementation of environmental and social measures during civil works
- Training on /biodiversity management
- Module on occupational health and safety
- Training on Grievance Mechanism management, including the SEA/SH GM procedures on reporting and complaint management
- Module on assessment of project-related SEA/SH risks, and World Bank requirements and guidelines in relation to managing those risks and to SEA/SH incident response
- Labor risk management
- Inclusive, accessible, and participatory stakeholder engagement

❖ **Grievance Mechanism**

The GM shall consist of a three-tier system: (i) local/community level; (ii) project level grievance resolution; and (iii) national legal level. The general process is that a project affected person (PAP) should first raise a grievance at the local level. If it is not resolved at this level, it is referred to the Grievance Resolution Committee (GRC). If this proves unsuccessful in resolving the grievance, the complainant can proceed to the judicial/legal system.

Local Level Grievance Resolution

Local communities have existing traditional and cultural grievance resolution mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of the Project, contractor(s), and or Government representatives at local and national level. The extended family, village and/or chiefs may be involved at this level. All non-sensitive and

minor complaints at the local level grievance mechanism is to be set up three months after Project effectiveness. More serious complaints including sensitive complaints (i.e., SEA/SH, violence against children, impropriety of project workers, corruption, incidents resulting in death) will be handled through a channel dedicated for such complaints. Other complaints such as breaches in community health and safety, resettlement issues, etc. will be managed by a higher-level process that includes a grievance resolution committee. In cases where the dispute relates to traditional and customary issues such as land ownership, inheritance, and land boundaries will be referred to the traditional dispute resolution mechanism comprising the Village head and community leaders. The specific composition and other details will be spelt out before project implementation. If the complaint cannot be resolved at this level, the PAP will be advised to proceed to the next level, the Project-level Grievance Resolution Committee. To facilitate the reporting on sensitive complaints, including those related to SEA/SH, distinct entry points/contact persons/reporting channels will be selected at local level and confirmed as safe and confidential during the consultations with women and girls (in small groups led by a woman). All SEA/SH survivors reporting abuse via those channels will be oriented to the GBV service provider and the GBV Specialist of the project (PIU) will be informed immediately to manage the complaint.

Project-level Grievance Resolution Committee

The Grievance Resolution Committee (GRC) will be responsible for receiving and resolving complaints in a fair, objective and timely manner in all phases of the project lifecycle. It will deal with all grievances that have not been resolved at the local level.

The broad responsibilities of the GRC include:

- Developing and publicizing the grievance management procedures
- Receiving, reviewing, investigating, and keeping track of grievances
- Adjudicating grievances
- Monitoring and evaluating the fulfillment of agreements achieved through the grievance mechanism.

The GRC will normally include a representative from each of the following agencies: (i) the Ministry of Tourism; (ii) The Project Coordinator, PIU or his/her representative; (iii) an NGO working in the sector; (iv) the Area Council; a representative of PAPs, Representative of the Ministry of Lands and Regional Government (if the grievance is related to lands/resettlement); and the social development specialist in the PIU serving as the secretary to the Committee, a representative of NCAC (if the grievance is related to the World Heritage Site), and a representative from the Ministry of Gender, Children and Social Welfare. The GM will establish ethical, confidential, and survivor-centered procedures for managing sensitive complaints. All SEA/SH complaints will be provided with referral to GBV service providers (if not already offered at local level) and will be verified and addressed by a restrained group within the GRC led by GBV Specialist and consisting of persons with experience in working on GBV related issues.

National legal level: If the GRC does not provide a satisfactory resolution for the PAP, he or she will be advised to seek resolution of grievances, as a last resort, through the judicial system as provided for in the Constitution 1997 and other relevant laws. Legal costs borne by the complainant will be his or her responsibility.

❖ **COVID-19 Pandemic Transmission Prevention and Response Plan**

Preventive measures: the strict observance of certain measures called "barriers" or "preventive" allow the companies, their partners, and all stakeholders to protect themselves from exposure and infection of COVID 19. Among these measures:

- Measures in case of contamination; it is a question of setting up an emergency plan for the management of cases of COVID-19; sensitizing the workers on how to behave in case of appearance of the symptoms of COVID-19; setting up a containment space within the life base or in a place designated to accommodate the persons having had contacts with the patients of COVID-19; setting up a switchboard allowing the workers or any other person in the zone of the project or in the right-of-way of the works to alert, in case of manifestation of symptoms.

❖ **Communication/Stakeholder consultation, participation, and engagement plan**

As part of the preparation of the ESMF, stakeholder consultation sessions were held from February 21 to March 2, 2022, with stakeholders, including administrative officials and technical structures (See Annex 5 of the Stakeholder Engagement Plan, as well as the signed minutes of the Stakeholder consultation workshop in Annex 12. The overall objective of public consultations in the context of environmental and social assessments is to involve the various stakeholders as well as the population throughout the decision-making process concerning a program or a project. The objective of the public consultations was to inform stakeholders about the project (objective, components, risks, impacts, and available/possible mitigation and enhancement measures to be explored to ensure project is socially and environmentally sound); to gather their opinions and concerns; and to lay the groundwork for a concerted and sustainable implementation of the project by taking into account their relevant concerns and comments to improve the project design and implementation and ensure their participation in the decision-making process.

The stakeholders consulted support the project overall. Nevertheless, some concerns and issues they raised included:

- The degradation of the environment of the existing cultural heritage
- The lack of consultation between the different tourism industry business owners/players
- The risks of conflicts of interest and positioning of tourism owners/players
- The risks of disruption of socio-economic activities along the erosion zones during the civil works
- The risks of a decrease in the income of the stakeholders operating in the sites where work is planned
- Pollution of the beaches and riverbeds-shores by fisherfolk (i.e., overfishing wastes disposals, etc.)
- The degradation of the country's image due to sex tourism/exploitation and sexual abuse of children
- Conflicts over land between traditional leaders and the government, and between community members.

The recommendations of the stakeholders include:

- The promotion of the Gambian destination through the revitalization of ecological sites and the rehabilitation of world heritage historical sites such as the Kunta Kinteh island
- The promotion of ecotourism through the reintroduction of animal species (gazelles, lions, buffaloes, giraffes, elephants, etc.)
- The promotion of cultural and cultural tourism
- The development and promotion of new Gambian-made tourism products that attracts worldwide tourists, and most specifically domestic-tourists (new youth-led middle-class; new business/startups owners, etc.)
- Promotion of community-driven integrated tourism scheme whereby communities perceive a fair-share of tourism and natural resources management benefits (6-7%)
- The implementation of sustainable development for the protection of coastal erosion areas
- Improving communication between stakeholders in the tourism sector

- Capacity building of institutions involved in tourism governance

BUDGET

The budget for the implementation of the ESMF estimates the additional costs related to the environmental and social assessment procedures of the sub-projects, monitoring and evaluation, and training and capacity building.

Estimated costs of the ESMF environmental and social measures

| Activities | Quantity | Unit cost | Total cost US\$ |
|---|----------|-----------|-------------------------------|
| Institutional measures | | | |
| 1. Recruitment of Specialists in Environmental and Social Safeguards, Gender and GBV, Stakeholder Consultation/Communication Consultant, and OHS consultant | | | Included in budget of project |
| 2. Monitoring of the implementation of the project's environmental and social instruments by NEA, as well as logistic and technical support | | | 50 000 |
| E&S measures | | | |
| 3. ESMF National Outreach Workshop | 01 | 01 | 5 000 |
| 4. ESMF Regional Outreach Workshop | 03 | 2 500 | 7,500 |
| 5. Screening of sub-projects | PM | PM | Included in budget of project |
| 6. Environmental and Social Monitoring Plan | | | 195,000 |
| 7. Completion and implementation of ESIA's and implementation of the ESMPs after validation by the NEA | 05 | 100 000 | 500 000 |
| 8. Ongoing monitoring of ESMP implementation by Environmental and Social Specialists | | | Included in budget of project |
| 9. Evaluation (mid-term and final) of the implementation of the ESMF | 02 | 50 000 | 100 000 |
| Training/Awareness | | | |
| 10. Module on SEA/SH/VAC risk for PIU staff, project workers and beneficiary communities | 02 | 5 000 | 10 000 |
| 11. Occupational Health and Safety Module for contracted and supply workers | 02 | 3 500 | 10 500 |
| 12. Training on the World Bank's environmental and social standards – for PIU staff and contractors and implementing partner agencies | 03 | 5 000 | 15 000 |
| 13. Capacity building for all stakeholders – PIU, implementing partners, contractors etc. | | | 57,000 |
| Implementation of the GM | | | |
| 14. Formation and installation of Grievance Resolution Committees | 1 | 5000 | 5000 |
| 15. Organization of awareness raising campaigns and popularization of the GM to stakeholders in the communes of intervention | 3 | 2500 | 7000 |

| Activities | Quantity | Unit cost | Total cost US\$ |
|--|----------|---|---------------------|
| 16. Support for the operation of local management committees | 2 | 2500 | 5000 |
| 17. Oversight and evaluation of the complaint management process | 1 | 4000 | 4000 |
| 18. Implementation of the SEA/SH Prevention and Response Action Plan (see Annex 4) | | | 75000 |
| TOTAL | | One million forty-six thousand USD | 1,046,000.00 |

INTRODUCTION

1.1. Background

The World Bank is financing the Tourism Diversification and Resilience in The Gambia Project (P177179) to be implemented by the Ministry of Tourism and Culture (MoTC). The Project Development Objective is to support/improve diversification and resilience of The Gambia tourism sector in selected destinations. The Project aims to improve the diversification and resilience of the Gambian tourism sector by strengthening institutional and policy frameworks, improving market linkages through technical assistance capabilities and access to funds for tourism related micro, small and medium-size enterprises (MSMEs), and building resilience through the strengthening of sustainable coastal infrastructure and rehabilitation of existing tourism sites.

The aim of the project is to enhance the investment climate, competitiveness, and sustainability of selected tourism destinations, to promote growth through private sector participation and jobs creation. This implies improving the sector's development framework, increasing the participation and value addition of tourism related Micro, Small and Medium Enterprises (MSMEs), and developing sector resilience with the restoration, upgrading, and preservation of critical tourism assets, as well as product diversification.

Specific activities related to destination development and improving MSME capabilities will be determined during implementation. Potential sites under consideration include: Abuko Reserve (Western River), River Gambia National Park (Kiang West) and Bijilo National Park (West Coast). Tourism is recognized as a key productive sector in the current National Development Plan (NDP) of The Gambia, and it is one of the main contributors to both Gross Domestic Product (GDP) and employment. The Government of The Gambia recognized tourism as a key productive sector in its current NDP. In addition to agriculture and fisheries, tourism is seen as one of the private sector engines for future growth, transformation, and job creation. However, for tourism to materialize its potential, the government has recognized the need to overcome the main challenges faced by the sector such as lack of destination recognition/attractiveness; dwindling product quality; undiversified products and source markets; limited air access and reliance on tour operators; security; climate change; environmental degradation; and a weak statistical base to timely and effectively inform policy decisions-making.

In addition to the challenges posed by the COVID-19 pandemic, both nationally and internationally, significant constraints in the enabling environment undermine the sector's competitiveness. First, the sector is heavily reliant on international tour operators (ITOs) and dependent on a few European markets, let alone the regional markets as well. ITOs bring roughly 70 percent of all tourists, over 65 percent of 2019 arrivals were from Europe and between 60 and 70 percent of arrivals happen from October to March. This trend has encouraged volume and low prices over quality and environmental sustainability. Second, marketing efforts have largely been led by ITOs since the capacity of the government to collect and use data to promote the destination is quite limited. Attracting new tourist segments/source markets and extending the tourist season will require the ability to deploy evidence-based strategic marketing. Third, there has not been a diversification in product offerings and tourist profiles with the beach— "Sun and Sand", amongst other offerings packages, being the main attraction for about 80 percent of tourists visiting the country. Finally, public, and private sector coordination, as well as horizontal and vertical coordination within the public sector are limited. For any strategy to be successful, collaboration and coordination among government bodies and agencies, and the private sector is necessary. The country can benefit from past coordination experiences with different stakeholders, such as the establishment of the Marketing Committee by The Gambia Growth and Competitiveness Project, or the execution of the Public-Private Dialogue Mechanism (PPDM) by the Support to Tourism COVID-19 Recovery in The Gambia.

Developments in the Tourism Development Area (TDA) in the Greater Banjul Area (GBA) has contributed to domestic migration from poorer rural areas and foreign migration (mostly from nearby countries in West Africa) to Kotu and Kololi, and more recently Bijilo, and Brusubi (Kombo North) largely because of the proximity to the Atlantic Ocean and the possibility of accessing tourism-related employment opportunities. The Gambia is known as a popular and affordable tourist destination especially among European tourists, which are targeted by tourist operators, especially given its relative proximity. Though such a portrait has changed since, for a while, The Gambia is also known for sex tourism, in some cases, with tourists seeking relationships with Gambian men/women. Some workers in the hospitality sector (hotels, bars, restaurants, tour guides, etc.) are also vulnerable to sexual exploitation and abuse/sexual harassment (SEA/SH) in the workplace. While prostitution in The Gambia is illegal per its constitution and related laws, it often takes place on the beach, in bars and hotels facilities on the coast (primarily at the popular "Senegambia strip" and the coastal area around Kololi). In addition, the HIV-AIDS infection rate among those involved in sex work is high.¹¹

1.2. ESMF objective and rationale

1.2.1 Objective

The ESMF sets out the procedures to ensure that the environmental and social risks and impacts associated with the implementation of the project activities are properly assessed, monitored, and managed throughout the project lifecycle. The ESMF will apply to the entire project including all activities funded under the Matching Grant scheme under component 1B set to be managed by a Managing Company (MC), and Component 2 (tourism infrastructure support).

Furthermore, during implementation, once the technical designs and physical footprints of the proposed sub-project activities are known, the ESMF screening form (annex 6) will be used for the screening of all activities which will inform subsequent preparation of site-specific standalone environmental and social risk management instruments. This will ensure that all potential risks and impacts of proposed project activities are identified, assessed, evaluated, and managed, using the mitigation hierarchy, throughout the project lifespan.

It contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, including on its capacity to manage environmental and social risks and impacts. It includes adequate information on the area in which subprojects are expected to be sited, including any potential environmental and social vulnerabilities of the area; and on the potential impacts that may occur and mitigation measures that might be expected to be used.

The ESMF will establish and apply a mitigation hierarchy that must (i) anticipate and/or avoid risks and impacts; (ii) where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (iii) once risks and impacts have been minimized or reduced, mitigate risks and impacts; and (iv) where significant residual impacts remain, compensate, or offset them, where technically and financially feasible.

The ESMF is designed to be a screening mechanism for environmental and social impacts of investments and activities when their sites are unknown prior to project implementation. It is therefore intended as a tool for identifying and assessing the potential future environmental and social impacts of investments to

¹¹ UN AIDS. "Five questions about The HIV Response in The Gambia" (31 Oct. 2021)
<https://www.unaids.org/en/resources/presscentre/featurestories/2021/october/five-questions-gambia>

be financed by the project. As such, it serves as a guide for the preparation of specific Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs) for project activities whose number, physical locations, and environmental and social characteristics are known.

Specifically, the objectives of the ESMF are to:

- Identify all relevant potential environmental and social risks and impacts that may arise because of the project and the sub-projects that it will support
- Specify appropriate roles and responsibilities of involved stakeholders in the implementation of the ESMF
- Develop sub-project review procedures as well as forms, guidance, and checklists to apply technical input for the sub-projects
- Develop a screening procedure to identify the environmental and social issues associated with the sub-projects and determine which environmental and social risk management instruments will need to be prepared: ESIA with ESMP, stand-alone ESMP, a RAP, a Process Framework (PF), a Biodiversity Management Plan (BMP) and/or a Cultural Heritage Management Plan (CHMP).
- Review and assess the capacity of the project implementation entities, especially the Project Coordination Unit but also other government agencies that will play a contributive role into the implementation of the project, to screen sub-projects and monitor and report on the implementation of the relevant environmental and social (E&S) instruments and make proposals for capacity enhancement as appropriate
- Provide estimates for the budget required for project preparation and potential implementation of E&S instruments during the implementation phase of the project
- Develop a public consultation and stakeholder engagement strategy
- Define appropriate environmental and social standards performance indicators
- Provide practical information resources for implementing the ESMF

1.2.2 Rationale

As stated above, this ESMF is prepared under the World Bank Environmental and Social Framework (ESF) which requires the Borrower, to comply with eight (08) out of ten (10) Environmental and Social Standards (ESSs) (Table 1) relevant for the project. At this stage of project preparation, since the exact physical locations/sites of the specific sub-project activities are not yet confirmed, the project must prepare an ESMF, which provides guidelines on processes and procedures to follow during project implementation to ensure compliance with both the applicable national regulations and the ESF and its ESSs. Other instruments prepared by the project include the Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and a Resettlement Policy Framework (RPF). These documents are to guide the management of potential environmental and social risks and impacts associated with the project.

The relevant World Bank Environmental and Social Standards are:

- ESS1 - Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 - Labor and Working Conditions
- ESS3 - Resource Efficiency and Pollution Prevention and Management
- ESS4 - Community Health and Safety
- ESS5 - Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement
- ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS8 - Cultural Heritage
- ESS10 - Stakeholder Engagement and Information Disclosure

Approach and Methodology for ESMF Preparation

The ESMF has been prepared in accordance with the applicable national environmental and social regulations, the relevant World Bank ESSs, and the World Bank Group General Environmental, Health and Safety Guidelines (EHSs)¹² which involve the following activities:

- Literature/Document review
- Pre-mission virtual meeting with the client and the World Bank
- Field visits/consultations with relevant institutions and implementing partners
- Weekly joint meetings with the Client and the World Bank to monitor progresses; and Information collation, analysis, and preparation of report.

The following relevant documents were reviewed:

- Project Concept Note (PCN)
- The Project Appraisal Document (PAD)
- Project Procurement Documents (PPSD)
- Proposed project activities submitted by potential
- World Bank Environmental and Social Framework and relevant World Banks Safeguard Policies that have not been replaced by the Environmental and Social Standards (ESSs), and the World Bank Group General Environmental, Health and Safety Guidelines
- Relevant key international conventions ratified by The Gambia
- Good practice ESMF documents
- Borrowers Guidance¹³ Notes of the ESS's from the World Bank and other guidance such as the World Bank Good Practice Notes such as Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works,¹⁴ non-discrimination and persons with disability¹⁵, managing labor influx,¹⁶ and gender¹⁷.

1.3. Methodology for ESMF development

This study incorporates inclusive and participatory consultative methods with key stakeholders to inform and supplement data collected for the ESMF. The approach is as follows:

- A scoping meeting with the team from the Ministry of Tourism and Culture, which is responsible for preparing and coordinating the Gambia Tourism Recovery, Diversification and Resilience Project, to agree on the objectives of the mission, to agree on the main issues related to the

¹² The guidelines for Environment, Health and Safety can be consulted at the following link: https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/EHS-Guidelines/

¹³ Guidance notes for Borrowers: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources#guidancenotes>

¹⁴ Good Practice Note Addressing Sexual Exploitation and Abuse and Sexual Harassment in the Financing of Investment Projects involving Major Civil Works : <http://pubdocs.worldbank.org/en/215761593706525660/ESF-GPN-SEASH-in-major-civil-works-English.pdf>

¹⁵ Good Practice Note for Non-discrimination and Disability : <http://pubdocs.worldbank.org/en/366051548972401439/ESF-Good-practice-note-disability-french.pdf>

¹⁶ Assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx <https://thedocs.worldbank.org/en/doc/fc074f5b6cc1621dc65675bf83c9d0b8-0290032021/original/ESF-Labor-Influx-Good-Practice-Note.pdf>

¹⁷ Good Practice Note for Gender <http://pubdocs.worldbank.org/en/158041571230608289/Good-Practice-Note-Gender.pdf>

preparation of this document, to identify the stakeholders to be consulted, and to obtain the basic documents (concept note, sectoral documents, etc.)

- A document review through the collection and use of project documents (for an appropriation of the Project components and its potential activities), national policies and strategies, ESF and ESS of the World Bank and the Environmental, Health and Safety Guidelines (EHS) of the World Bank Group.
- Meetings/consultations with project stakeholders. The objective of this process is to collect the opinions, concerns, and recommendations of stakeholders on the Project. To this end, individual interviews were conducted with the heads of the deconcentrated technical services in charge of tourism and the environment and focus groups or collective meetings were organized with the participation of stakeholders in the tourism sector. These stakeholder consultations were held from February 21 to March 2, 2022 (see list of people consulted in the Annex 12). The site visits focused on the project intervention sites (Abuko Reserve, Bijilo Coastal Forest Park, coastal erosion sites, Kunta Kinteh Island, etc.). All these consultations were conducted in accordance with the World Bank’s recommendations for conducting consultations in the context of COVID-19. The discussions were conducted using interview guides and open-ended interviews.

1.4 Project Components and Activities

The World Bank is financing the **Tourism Diversification and Resilience in The Gambia Project (P177179)** to be implemented by the Ministry of Tourism and Culture (MoTC). The Project Development Objective is to support/improve diversification and resilience of the Gambia tourism sector in selected destinations.

The Project consists of four components as described in the table below.

Table 1: Review of the Four Components of the Project

| Component | Cost (USD million) | Sub-Component | Types of activities likely to be funded |
|-------------------------------------|--------------------|--|---|
| 1. Support to the Tourism Ecosystem | 13.00 | 1A: Improved institutional capacity for data-driven planning, marketing, and branding | <ul style="list-style-type: none"> • Capacity building for all stakeholders • Capacity building and strategic guidance for marketing and branding • Design and conduct capacity building training programs in the following areas • Supervision and guidance for the roll-out of data collection and analysis instruments. • Development and support to the implementation of a marketing strategy with a focus on digital tools and channels. |
| | | 1B: Increase participation of MSMEs ¹⁸ within the selected destinations | <ul style="list-style-type: none"> • Capacity building of MSMEs • Capacity building of women entrepreneurs • Funding support for MSMEs and women-led businesses |

¹⁸ The 2019 – 2024 Gambia national policy for MSMEs defines any company which exists after 12 months of operation, with these variables; number of employees less than 49, assets less than \$100K, and turnover less than 200K. The suppliers of goods and services identified to have potential linkages to larger tourism firms such as hotels, and tour operators, are predominantly in the food and beverage sectors. Horticulture, meat, dairy, locally made fruit juices, local tea and oils, breweries and other

| | | | |
|---|-------|---|---|
| | | | <ul style="list-style-type: none"> • Co-funding MSMEs to leverage private capital mobilization • Manage technical assistance and the matching grant scheme, and ensure operational and implementation efficiencies and risk reductions |
| Infrastructure Support for the Diversification and Resilience of the Tourism Sector | 50.00 | 2A: Protection, rehabilitation, and integrated management of coastal areas | <ul style="list-style-type: none"> • Upgrading infrastructure to better preserve existing assets • Capacity building at the community level on climate resilience • Nature-based solutions (NBS) and hard infrastructure to improve the resilience of the tourism infrastructure |
| | | 2B: Integrated Tourism Product Development and Diversification of selected TDA/tourism areas | <ul style="list-style-type: none"> • Infrastructure investments in certain tourist destinations/areas • Interventions will aim to reduce the vulnerability of key tourism sites (such as Kunta Kinteh island) the impacts of climate change, like erosion, and it may include reconstruction of select jetties along the River Gambia to be more resilient. |
| Project Management, Monitoring and Evaluation | 5.00 | N/A | |
| Contingent Emergency Response Component | 0 | N/A | |

More concretely, the project will contribute to increasing the destinations incomes,¹⁹ increase the gross income of MSMEs and entrepreneurs (with a quota for women and young people) and increase the value of private investments mobilized in the tourism sector. The main indicators for assessing the level of achievement of the expected results are:

- Number of arrivals from non-traditional markets (number)
- Share of beneficiary MSMEs with new or expanded contracts with tourism Lead Firms (disaggregated by gender) (percentage)
- Shoreline with targeted coastal erosion control measures (Kilometers)

Component 1: Policy Framework and MSME participation

The interventions under this component aim to address selected key bottlenecks in the tourism ecosystem in The Gambia to ensure that the sector realizes its potential as a source of sustainable and inclusive growth. Activities around data and marketing will be coordinated to promote the diversification of the destination and gender-sensitive policies, including those reducing risks of gender-based violence (GBV). This component includes two sub-components as described below.

- **Sub-Component 1a: Improved institutional capacity for data-driven planning, marketing, and branding**

beverages, seafood, poultry, cosmetics, apparel, art (including cultural entertainment) and crafts. Web platforms, and web-based delivery businesses, industry trade fairs, community and women agriculture business groups, locally manufactured furniture, are non-traditional sub-sectors identified to be potential suppliers.

The objective of this sub-component is to improve the ability of the country to use data in their tourism planning efforts and to attract a more diverse set of tourists. Activities under this sub-component aim to (1) support the development of a participatory data-driven marketing strategy with a focus on digital tools and channels and non-traditional markets, (2) strengthen the capacity of the Gambia Tourism Board and related institutions in data collection and analysis, and (3) improve inter-institutional coordination.

- **Sub-component 1b: Increase participation of tourism MSME within the selected destinations**
- This subcomponent will contribute to the PDO by supporting diversification and inclusivity of the tourism sector in The Gambia, by promoting tourism MSMEs' sustainable integration into value chains with established end markets. The objective of the subcomponent is to create a supply chain structure for upgrading domestic MSMEs; facilitating the transfer of technology, knowledge, and skills; and improving business and management practices and access to markets. This will be achieved by enabling more tailored capacity-building services and co-funding for a wider segment of tourism-related businesses that are suppliers of goods and services for lead firms such as hotels and tour operators.
 - **Technical and compliance support to tourism MSMEs**
The Project will take a Lead Firm approach to MSME solution, one that leverages large firms to expand the capacity of the MSMEs in their value chain or have the potential to be suppliers of goods and services e.g., food and beverage, furniture, apparel, arts and crafts etc. This direct approach will ensure private sector leadership by customizing the MSME strengthening to meet market requirements.
 - **Co-funding MSMEs to leverage private capital mobilization**
This fund aims to assist The Gambian tourism MSMEs to address their capital needs for investing in digital technologies and climate-smart infrastructure to increase adaptability and resilience to climate change, as well as provide working capital to firms which, while remaining viable and sustainable, have experienced cash flow disruptions because of the measures taken to contain the COVID-19 pandemic.

Component 2: Infrastructure support for the diversification and resilience of the tourism sector

This component aims to build the climate resilience of the tourism sector. It will focus on strengthening and upgrading infrastructure to better preserve existing assets by being more resilient to the impacts of hazards and climate change as well as enhance the attractiveness of tourism sites and promote economic development. This component includes two sub-components as described below.

- **Sub-Component 2a: Protection, rehabilitation, and integrated management of coastal areas**
This sub-component aims to address the impacts of coastal erosion and sea-level rise using a combination of nature-based solutions (NBS) and hard infrastructure to improve the resilience of tourism infrastructure. The project will consider interventions of erosion control through the restoration of shorelines on the west coast.
- **Sub-Component 2b: Integrated tourism product development and diversification of selected TDA/tourism areas**
This sub-component aims to enhance the resilience and attractiveness of existing but underdeveloped and at-risk tourism areas. Following identification of sites in Component 1, this sub-component will be engaged in supervision & design and construction activities to improve the resiliency of tourism sites.

Component 3: Project Management, Monitoring and Evaluation

This component covers the activities of the PIU that was set up by the Government of The Gambia (GoG) during the project preparation phase. The PIU will be responsible for overall supervision, quality assurance and M&E, coordination with other relevant Ministries as well as coordination and implementation of policy and regulatory framework related issues. The operation level PIU will be set up for the day-to-day operations of the project, facilitation, monitoring, fiduciary supervision, and safeguards management as well as for institutional coordination among the various agencies involved with project activities at the national and local levels. The staff of PIU should comprise professional experts to be selected competitively on a merit-basis and be paid at market rate, and if possible, on a milestone completion basis. During preparation, implementation arrangements will be identified in consultation with the counterpart Ministry(ies).

Component 4. Contingent Emergency Response Component (CERC)

The objective of this zero-cost component is to allow for a rapid reallocation of credit proceeds from other components to provide emergency recovery and reconstruction support following an eligible crisis or emergency. This component would finance public and private sector expenditures on a positive list of goods or specific works, services, and emergency operation costs required for The Gambia's emergency recovery. A Contingent Emergency Response Implementation Plan that details financial management,

Beneficiaries include:

- Technical government agencies such as Gambia Tourism Board to better leverage market intelligence to increase the understanding of demand trends, and promote the destination, diversifying towards new source markets and higher-value growth segments (e.g., birdwatching, ecotourism, etc.).
- MSMEs in the sector involved in accommodations, adventure and recreation, attractions, events and conferences, arts and crafts, tourism services, and travel trade that could benefit from partnerships with large firms like hotels, the digital marketplace, tour operators that have proximity to market and are innovators in the sector. Women and youth who will be assisted to receive tourism skills training, especially, women who are typically more present in food services and growth in the tourism sector and given that women-owned businesses are seen to face more constraints. The youth on the other hand tend to be in a permanent cycle of unemployment and vulnerable to dangerous "back way" migration due to lack of job and business opportunities. There are some women/girls and men who are vulnerable in this sector to issues related to sexual tourism and/or sexual exploitation and abuse/sexual harassment (SEA/SH).
- Women/youth in this sector would also benefit from measures to reduce these risks via this project.

Population living and working along the coastal areas, who will be protected against flooding and coastal erosion.

More concretely, the project will contribute to increasing the destinations incomes,²⁰ increase the gross income of MSMEs and entrepreneurs (with a quota for women and young people) and increase the

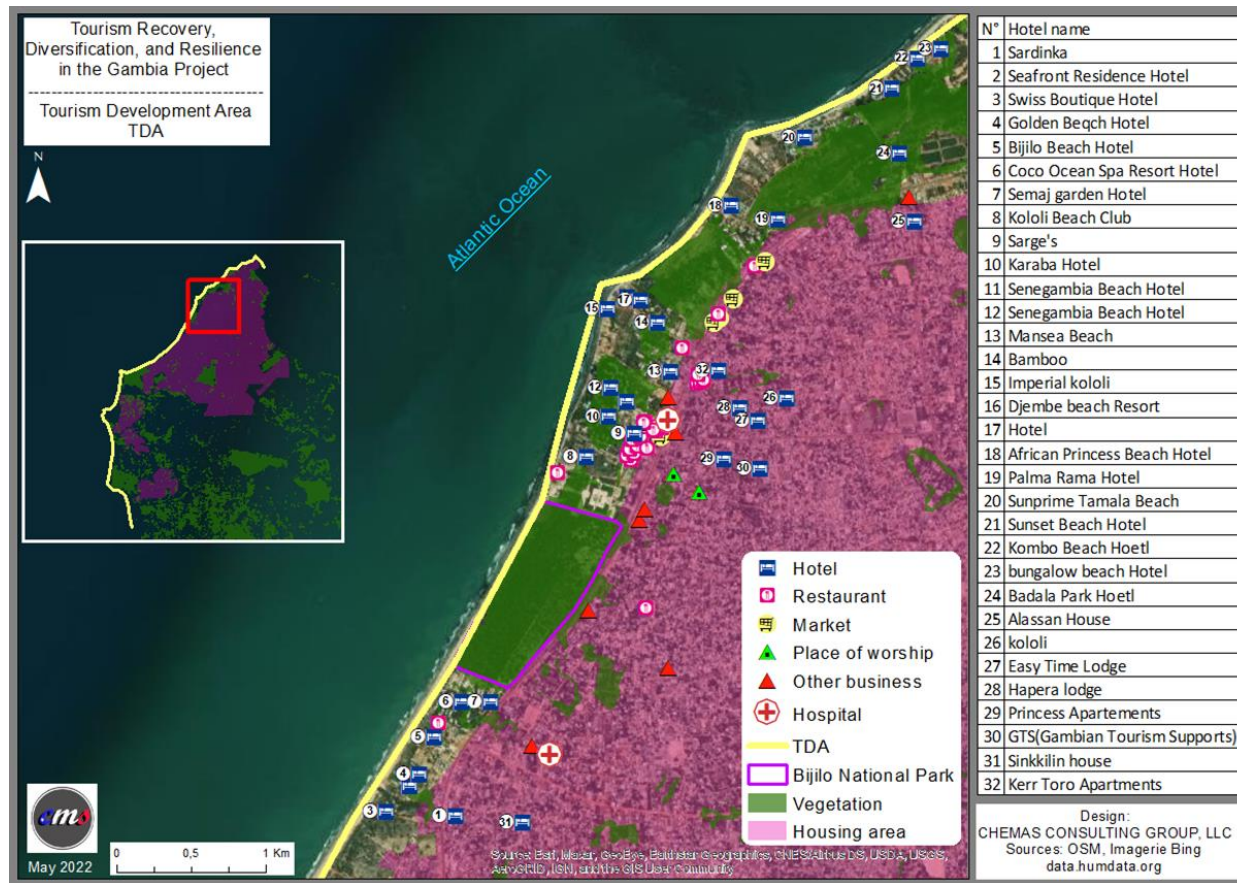
²⁰ - This will also revamp/encourage the development of local tourism which is more conducive and responsible. There is a growing middle-class that is very potential stakeholders/clients for the Tourism sector.

value of private investments mobilized in the tourism sector. The main indicators for assessing the level of achievement of the expected results are:

- (d) Number of arrivals from non-traditional markets (number)
- (e) Share of beneficiary MSMEs with new or expanded contracts with tourism Lead Firms (disaggregated by gender) (percentage)
- (f) Shoreline with targeted coastal erosion control measures (Kilometers)

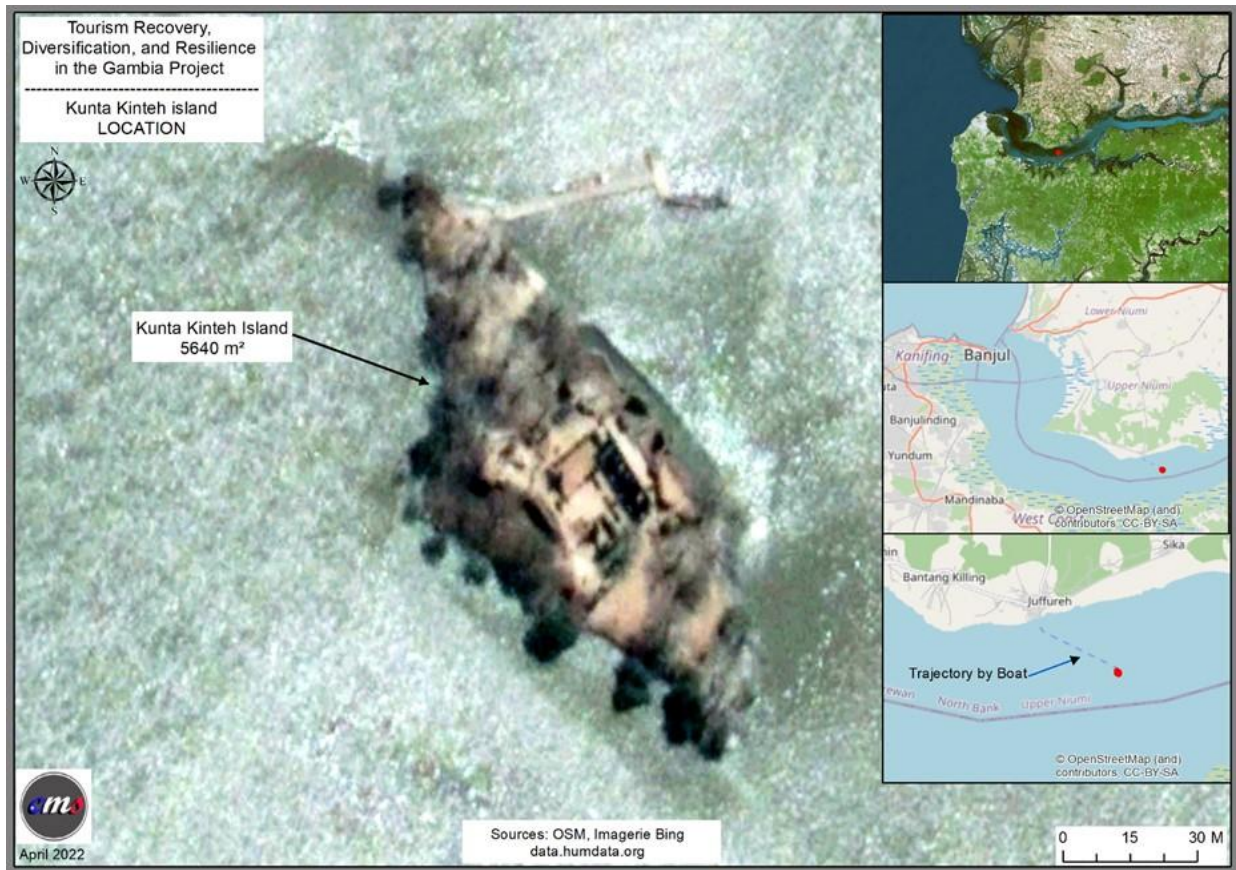
The project will be implemented in the West Coast Region, North Bank Region, Central River Region and Upper River Region, and Figure 1a and 1b below shows the project area of in the Gambia Tourism Diversification and Resilience Project.

Figure 1a: Project intervention area in the Greater Banjul Area



Source: CHEMAS Consulting Group, LLC, Field mission, February 2022

Figure 1b: Kunta Kinteh World Heritage Site



Source: CHEMAS Consulting Group, LLC, Field mission, February 2022

Component 1: Policy Framework and MSME participation

The interventions under this component aim to address selected key bottlenecks in the tourism ecosystem in The Gambia to ensure that the sector realizes its potential as a source of sustainable and inclusive growth. Activities around data and marketing will be coordinated to promote the diversification of the destination and gender-sensitive policies, including those reducing risks of gender-based violence (GBV). This component includes two sub-components as described below.

- **Sub-Component 1a: Improved institutional capacity for data-driven planning, marketing, and branding**

The objective of this sub-component is to improve the ability of the country to use data in their tourism planning efforts and to attract a more diverse set of tourists. Activities under this sub-component aim to (1) support the development of a participatory data-driven marketing strategy with a focus on digital tools and channels and non-traditional markets, (2) strengthen the capacity of the Gambia Tourism Board and related institutions in data collection and analysis, and (3) improve inter-institutional coordination.

- **Sub-component 1b: Increase participation of tourism MSME within the selected destinations**

- This subcomponent will contribute to the PDO by supporting diversification and inclusivity of the tourism sector in The Gambia, by promoting tourism MSMEs' sustainable integration into value chains with established end markets. The objective of the subcomponent is to create a supply chain structure for upgrading domestic MSMEs; facilitating the transfer of technology, knowledge, and skills; and improving business and management practices and access to markets. This will be achieved by enabling more tailored capacity-building services and co-funding for a wider segment of tourism-related businesses that are suppliers of goods and services for leading firms such as hotels and tour operators.

- **Technical and compliance support to tourism MSMEs**

The Project will take a Lead Firm approach to MSME solution, one that leverages large firms to expand the capacity of the MSMEs in their value chain or have the potential to be suppliers of goods and services e.g., food and beverage, furniture, apparel, arts and crafts etc. This direct approach will ensure private sector leadership by customizing the MSME strengthening to meet market requirements.

- **Co-funding MSMEs to leverage private capital mobilization**

This fund aims to assist The Gambian tourism MSMEs to address their capital needs for investing in digital technologies and climate-smart infrastructure to increase adaptability and resilience to climate change, as well as provide working capital to firms which, while remaining viable and sustainable, have experienced cash flow disruptions because of the measures taken to contain the COVID-19 pandemic.

Component 2: Infrastructure support for the diversification and resilience of the tourism sector

This component aims to build the climate resilience of the tourism sector. It will focus on strengthening and upgrading infrastructure to better preserve existing assets by being more resilient to the impacts of hazards and climate change as well as enhance the attractiveness of tourism sites and promote economic development. This component includes two sub-components as described below.

- **Sub-Component 2a: Protection, rehabilitation, and integrated management of coastal areas**

This sub-component aims to address the impacts of coastal erosion and sea-level rise using a combination of nature-based solutions (NBS) and hard infrastructure to improve the resilience of

tourism infrastructure. The project will consider interventions of erosion control through the restoration of shorelines on the west coast.

- **Sub-Component 2b: Integrated tourism product development and diversification of selected TDA/tourism areas**

This sub-component aims to enhance the resilience and attractiveness of existing but underdeveloped and at-risk tourism areas. Following identification of sites in Component 1, this sub-component will be engaged in supervision & design and construction activities to improve the resiliency of tourism sites.

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Beneficiaries include:

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- Women/youth in this sector would also benefit from measures to reduce these risks via this project.

- Population living and working along the coastal areas, who will be protected against flooding and coastal erosion.

1.5 Policy framework applicable to the project

Table 2 below indicates the relevant national policies that will guide the development and implementation of the Project.

Table 2: Relevant national policies

| Policy | Description | Relevance to the Project |
|--|--|--|
| National Policy for the Advancement of Gambian Women and Girls (1999-2009) | Policy provides a legitimate point of reference for addressing gender inequalities at all levels of government and all stakeholders | Relevant to this Project since the Project will pay special attention to gender-sensitive policies, including those reducing risks of GBV. The Project will contribute to advancement of Gambian women and reducing gender inequalities. |
| National Youth Policy (2009–2018) | Policy aims to mainstream youth issues into the advancement of all sectors | Successful project implementation will encourage youth to be part of training and skills development to reduce youth unemployment |
| Gambia Environment Action Plan, GEAP (2009-2018) | Integrated environment and natural resources management | Since the Project is intervening in park like the Gambia river national park and must integrate natural resource management. |
| Forestry Policy (2010-19) | Promotes state and community forest development and management | Forest parks like Bijilo, Abuko, Gambia river national parks could be affected by this Project. |
| Gambia National Gender & Women Empowerment Policy (2010–2020) | To mainstream gender in national and sectoral planning and programming to ensure equity and equality | Women will be consulted widely and will be involved in the local monitoring and evaluation process during project implementation |
| The National Biodiversity Strategy and Action Plan (NBSAP), 2015 | The NBSAP recognizes the conservation and sustainable use of biodiversity | Areas with important biodiversity patterns like Bijilo, Abuko, Gambia river national parks could be affected by this Project. |
| National Climate Change Policy (2016 – 2025) | Policy provides the framework for managing climate risks, building institutions, capacities, and opportunities for climate-resilient development | The Project is planning to build infrastructure taking into account climate change pattern wave breaker to protect against erosion. |
| National Strategic Environmental Assessment Policy (2017- 2021) | Aims to ensure environmental sustainability | Some environmentally sensitive areas like national parks and gazetted forest will be affected by the Project. |

1.6.1. Legal framework

The legal framework for this study consists of the international conventions signed and ratified by The Gambia as well as the national Acts that provide a framework for the implementation of activities in a sustainable development perspective.

Table 3: National legal framework

| Title of Act or Regulations | Description | Relevance to the Project |
|---|--|--|
| National Environment Management Act, 1994 | Principal legislation in environmental management; Part V of Act provides for certain projects listed to be considered for ESMF and other E&S assessment (ESIA, ESMP, Audit, etc.) Responsible for providing the final approval of environmental assessments and certifying, where appropriate, the compliance of the proposed activities with Gambia's environmental protection legislation | Some of the proposed project activities falls under Schedule A which requires ESMF |
| Environmental Quality Standards Regulations 1999 | Regulations declare standards set out in Schedule 1 in respect of ambient air, saline waters, surface freshwater and groundwater | Project implementation can generate dust and pollute surface freshwater, and groundwater. |
| Environmental Discharge (Permitting) Regulations 2001 | Regulations require that a permit is obtained for discharge of potentially polluting liquids into or onto the ground (i.e., to groundwater) or into surface waters (such as rivers or streams) | Project implementation has the potential to discharge potentially polluting liquids into the tributaries and other surface water bodies |
| The Forest Act, 2018 | Provides the framework for implementation of Forestry Policy, and framework for the preservation and management of forests | Some activities of the project are in forest parks and must be guided by this Act |
| Biodiversity and Wildlife Act, 2003 | Provides the establishment of protected areas for protection of in-situ biodiversity; in addition to protect ex-situ biodiversity | Protected areas are within the project affected areas and intervention will occur in gazetted forests or park like Abuko, Bijilo, and the Gambia river national park. |
| National Council for Arts and Culture Act, 2003 | The act empowers the Council to assume control and preserve, restore any monument, relic, ethnographical article, or other article of archaeological ethnographical, or historical relevance. | Kunta Kinteh Island, Fort Bullen, and the historic buildings in the Albreda-Juffureh complex are legally protected as National Monuments (1995) under this Act. Project activities could unearth objects of historical relevance |
| The Children's Act 2005 | Act sets out the rights and responsibilities of children and provides for their care, protection, and maintenance | Rights of children may be impacted by the project implementation when children are used during the works. |
| Mines and quarries Act, 2005 | Act makes provision for prospecting for minerals, for carrying out mining and | Tracks and roads to be built and also renovation of some touristic sites during |

| Title of Act or Regulations | Description | Relevance to the Project |
|----------------------------------|--|---|
| | quarrying operations including gravel, sand, and for connected matters | project implementation involves use of sand and gravel aggregates mined. |
| Anti-littering Regulations, 2007 | Addresses waste management and pollution issues in relation to environmental health and hygiene | The project must ensure that all waste produced during all phases is well managed. |
| The Women's Act 2010 | Aims to advance women's rights to land and natural resources in order to promote their economic and social empowerment | Relevant to this project in view of potential impact on agricultural land farmed by women, on touristic areas where women are intervening and fisher women; need for adherence to OP 4.12; avoid gender-based violence (GBV) and sexual exploitation and abuse and sexual harassment (SEA/SH). |
| Sexual Offences Act, 2013 | Updates the law and procedures regarding the trial of rape, sexual offences, and related matters | This Act is relevant to the Project due to the need for protection of vulnerable persons within the Project sites against sexual offences, which is defined in the Act. |
| Trafficking in Persons Act, 2007 | Aim to avoid human trafficking and define the procedures and legislation regarding how to process cases or trial of human trafficking | The trafficking in Person's Act, 2007 is being enforced throughout the country. This is a comprehensive piece of legislation that addresses amongst other things the problems of trafficking in women and children, which can happen in the tourism industry. The main purpose of the act is to prevent, suppress and punish the perpetrators of trafficking in persons and to rehabilitate, and re-integrate survivors of trafficking. |
| Criminal Code (2007) | Define the repressive criminal acts and also the procedures for trial, especially for cases regarding violence against women and children. | The criminal code provides for traditional offences to sexual violence against women such as rape. According to section 122, the maximum punishment for rape is life imprisonment, and the maximum punishment for attempted rape is 7 years. |
| Lands (Regions) Act, 1945 | Regulates land tenure and property rights as well as general land administration in areas under Customary Land Tenure system. Act covers all Provinces land outside State Lands Areas. | Land in some parts of project areas fall under this Act. Potential project sites are held and administered under this Act. |
| State Lands Act, 1990 | Regulates land tenure and property rights as well as general land administration in State Lands areas. | All lands in the countries fall under this Act. Potential project sites in these areas are held and administered under this Act |
| Public Health Act, 1990 | Protects public and environmental health including abatement of nuisances and any condition that may be injurious to health. | Relevant to Project since dust, noise and other risks can be associated with the Project. |

| Title of Act or Regulations | Description | Relevance to the Project |
|---|---|--|
| Land Acquisition & Compensation Act, 1990 | Provides for consultation, resettlement, and compensation of land. | Project might cause involuntary resettlement due to certain project activities such as road construction coastal protection, etc. and the Act could be used in resettlement and compensations. |
| Physical Planning and Development Control Act, 1991 | Ensures developments in The Gambia are in line with land use planning and construction standards. | The project construction activities shall be in line with national land use and planning rules. |

1.6.2. International legal framework

These are the international conventions signed and ratified by The Gambia that are relevant for this project. These are detailed in Table 4 below.

Table 4: International legal framework related to the project

| Title of the text | Contextual reference | Relevance to the project |
|---|---|---|
| Convention on the Preservation of Wildlife in its Natural State (The London Convention) | Preservation of the fauna and flora in their natural state | This convention is targeting the preservation of the fauna and flora in their natural state. This agreement is relevant to the Project because of the development of access roads in the parks and gazette forests, which can create direct and/or indirect effects on natural environments and related species (mainly during the construction phase, and to a certain extent during operation, i.e., speed limits in the NP/NR). |
| Convention on World Cultural and Natural Heritage | It links together in a single document the concepts of nature conservation and the preservation of cultural properties. The Convention recognizes the way in which people interact with nature, and the fundamental need to preserve the balance between the two. | Article 4: "Each State Party to this Convention recognizes the duty to ensure the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural [...], scientific and technical heritage". |
| Convention on Biological Diversity | The convention has three main goals: the conservation of biological diversity (or biodiversity); the sustainable use of its components; and the fair and equitable sharing of benefits arising from genetic resources. Its objective is to develop national strategies for the conservation and sustainable use of biological | As this convention in its Article 14 deals with "Impact Assessment and Harm Reduction", which states that: "Each Contracting Party shall, to the extent possible and appropriate: <ul style="list-style-type: none"> a) adopt procedures to require environmental impact assessments of its proposed projects that are likely to have significant adverse effects on biological diversity with a view to avoiding and minimizing such effects, and, where appropriate, provide for public participation in such procedures |

| Title of the text | Contextual reference | Relevance to the project |
|---|---|---|
| | diversity, and it is often seen as the key document regarding sustainable development. | <p>b) take appropriate steps to ensure that the environmental effects of its programs and policies that are likely to have a significant adverse effect on biological diversity are duly taken into account</p> <p>Henceforth, foreseen contractors working within the premises of these NP/NR would have to comply with the provision.</p> |
| United Nations Framework Convention on Climate Change | To stabilize greenhouse gas concentrations in the atmosphere at a level that will prevent dangerous human interference with the climate system, in a time frame which allows ecosystems to adapt naturally and enables sustainable development. | Article 4(f) of this Convention states that the signatory parties shall: "take into account, to the extent practicable, climate change considerations in their social, economic and environmental policies and actions and shall use appropriate methods, such as nationally formulated and defined impact assessments, to minimize adverse economic, public health and environmental effects of projects or measures undertaken by them to mitigate or adapt to climate change". |
| Convention No. 187 on the Promotional Framework for Occupational Safety and Health. | Promotional Framework for Occupational Safety and Health | Article 2 (paragraphs 1, 2 and 3) states that: "1. Each Member ... shall promote the continuous improvement of occupational safety and health in order to prevent work-related injuries, illnesses and deaths Each Member shall take active steps towards the progressive realization of a safe and healthy working environment.....". Each Member shall, in consultation with the most representative employers' and workers' organizations, periodically consider what steps could be taken to ratify the relevant ILO Conventions on occupational safety and health. |
| Convention on Wetlands of International Importance especially as Waterfowl Habitat, known as the "RAMSAR Convention". A Protocol amending this convention was adopted and entered into force on October 1, 1986 | Wetlands | <p>Protects wetlands of international importance especially as habitat for wetland birds.</p> <p>This Project will be implemented in wetland areas, (i.e., mangrove prone areas including the kunta-Kinteh island and other sites with such environment (Bijilo, Abuko, GNRP, etc.)</p> |
| Convention on the Conservation of Migratory Species of Wild Animals (CMS) known as the "Bonn Convention" | Migratory wildlife species | Its objective is to ensure the conservation of migratory species along the entire route they take and to protect certain endangered species: stork, white-cheeked otter, addax, gazelle etc. (Abuko Reserve is known as a resting, and nesting habitat for migratory birds). |

| Title of the text | Contextual reference | Relevance to the project |
|--|---|--|
| UN Convention on the rights of the Child, (UNICEF1989) | An international human rights treaty which sets out the civil, political, economic, social, health and cultural rights of children. | <p>The rights in the treaty include the right to education, the right to play, the right to health and the right to respect privacy and family life.</p> <p>The project could potentially affect the right to health of the child through the generation of dust, and air pollution, poor waste management, and spread of malaria due to stagnant water in quarry pits, but also there is a risk that children can be hired during works or in the tourist sector or be solicited for sex tourism/trafficking in this sector. Special attention will be particularly given to the implementation of Matching Grant-funded activities led by the MSMEs. The PIU and the MC teams will closely monitor this particularity.</p> |
| United Nations Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) and the Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women (OP-CEDAW) | Requires countries to eliminate discrimination against women and girls in all areas and promotes women's and girls' equal rights. | Convention highlights the right of women to own, manage, enjoy, and dispose of property as central to their financial independence and may be critical to their ability to earn a livelihood and to provide adequate housing and nutrition for themselves and for their children. Women are the main targets of the Project and will ensure that they have access to benefits of this Project in the same way as men. This is particularly relevant to the project on Component 1B and 2; particularly on Component 1B with matching grant-funded activities where women and children might constitute a center target. Close monitoring by the PIU and the MC team will help to mitigate such potential risks. |

1.6.3. World Bank Environmental and Social Framework (ESF)

1.6.3.1. Scope of the Environmental and Social Framework (ESF)

The World Bank's ESF describes the Bank's commitment to promoting sustainable development through a policy and set of environmental and social standards (ESS) designed to support borrower country projects to end extreme poverty and promote shared prosperity. It allows for adaptive management of project risks and impacts and integrates both environmental and social dimensions across the 10 Standards. The eight relevant standards are assessed and how the project will address gaps between national law and the ESF (Table 5).

Table 5. World Bank Environmental and Social Standards and Relevance to the Project

| Environmental and Social Standards (ESS) | Environmental and/or social aspects covered | Relevance to the Project |
|--|---|---|
| ESS 1: Assessment and management of | The ESS 1 sets out the Borrower's responsibilities to assess, manage, and | The Gambia Tourism Project is likely to generate environmental and social risks and impacts that will |

| Environmental and Social Standards (ESS) | Environmental and/or social aspects covered | Relevance to the Project |
|--|--|--|
| environmental and social risks and impacts | monitor the environmental and social risks and impacts associated with each stage of a project financed by the Bank through Investment Project Finance (IPF), to achieve environmental and social outcomes consistent with the ESS. | <p>need to be managed throughout the project cycle (preparation, construction, operation, and decommissioning). Therefore, ESS1 applies to the project.</p> <p>To assess, manage and monitor the environmental and social risks and impacts of the project, the project has prepared the ESMF and as required, will have to prepare ESIA/ESMPs.</p> |
| ESS 2: Labor and Working Conditions | The standard recognizes the importance of job creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote constructive relationships between project workers and the coordination/manager, and enhance the benefits of project development by treating workers fairly and ensuring safe and healthy working conditions | <p>The planning and implementation of some of the project activities will result in the creation of jobs (goods and services suppliers, construction, etc.) and the requirements for worker treatment and working conditions as defined in this ESS will need to be met. In addition, the analysis of working conditions will be conducted in the context of the COVID-19 pandemic to ensure worker health and safety throughout the project cycle.</p> <p>A LMP has been prepared to address this issue.</p> |
| ESS 3: Resource Efficiency and Pollution Prevention and Management | The ESS describes the requirements for addressing resource efficiency, pollution prevention and management throughout the life cycle of a project | <p>The project phases (construction, operation, and decommissioning) will require the use of resources and will result in environmental and resource pollution risks, in relation to which the requirements of the ESS No. 3 to address resource efficiency and pollution prevention and management, including waste management, must be met.</p> <p>The ESMF has made some provisions to specifically address these issues, particularly issue related to pollution control, biodiversity management, etc. Recommendation have been made to screen all foreseen subproject activities and if deemed relevant prepare, in addition to the project 's ESIA's, site specific ESMP to be carried out during implementation to consider the risks of pollution and degradation of natural resources.</p> |
| ESS 4: Community Health and Safety | The standard addresses the risks and impacts on the safety, security, and health of project-affected communities, and the respective responsibilities of Borrowers to reduce or mitigate these risks and impacts, with particular attention to groups that, because of their circumstances, may be vulnerable. | <p>All populations in the vicinity of the intervention areas, as well as workers, are likely to be impacted from a safety and health perspective during Project implementation. Also, the proposed project activities could have adverse health, safety, and security effects, including the risk of sexual exploitation and abuse of neighboring communities.</p> <p>Besides provisions already embedded in the ESMF, the E&S screening of project subcomponent activities will guide on the preparation of an ESIA for the project and site-specific ESMP and where find necessary a Biodiversity Management Plan (BMP). Both the ESIA and the related site-specific instruments to be</p> |

| Environmental and Social Standards (ESS) | Environmental and/or social aspects covered | Relevance to the Project |
|--|---|--|
| | | <p>prepared during implementation should consider impacts on community health and safety. A SEA/SH Prevention and Response Action Plan has been prepared and will be implemented before the start of project activities. The action plan includes mapping of GBV services where survivors of GBV, SEA/SH could be referred during implementation, awareness raising for community members on SEA/SH, content of CoC, how to signal a misconduct/abuse and what services are available and regular consultations with women on accessibility of GM and effectiveness of SEA/SH mitigation.</p> |
| <p>ESS 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement</p> | <p>The basic principle of the standard is that involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it should be limited, and appropriate measures to minimize negative impacts on displaced persons (and host communities that receive displaced persons) should be carefully planned and implemented.</p> | <p>The Project will require the construction of new tourism and coastal protection infrastructure in the project areas (climate resilience infrastructure, all seasons' access roads, tourism facilities, rehabilitations if cultural heritage facilities, etc. The design of some of these activities will likely involve land acquisition, restriction of access to some assets/properties which might result in risks of involuntary resettlement of populations, against which the requirements of ESS No. 5 must be met to avoid, and wherever possible minimize, involuntary resettlement by considering alternative project designs; avoid eviction; and mitigate unavoidable adverse social and economic impacts resulting from the above-mentioned land acquisition or restrictions on land use .</p> |
| <p>ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</p> | <p>The standard recognizes that the protection and conservation of biodiversity, and the sustainable management of living natural resources, are critical to sustainable development. It also recognizes the importance of conserving the key ecological functions of habitats, including forests, and the biodiversity they support.</p> | <p>Because some natural areas like parks and reserves like the river Gambia national park, Abuko Park, could be affected during project implementation, the ESS6 is relevant.</p> <p>For the design and preparation of some of the activities planned under the project, the ESMF provides checklists and guidance to help manage biodiversity issues for the different types of activities being funded. The ESMF assists in preventing engineering civil works that may negatively impact the ecological functions of natural habitats and the biodiversity ecology they support. While it is expected that in the sub-projects ESIA's biodiversity management should be addressed ; Biodiversity Management Plan (BMP) will be prepared to address impacts on the available natural resources upon which the livelihoods of riparian communities and the wildlife depend. Likewise, should the foreseen civil works lead to some restrictions of access to these resources for the riparian communities, as</p> |

| Environmental and Social Standards (ESS) | Environmental and/or social aspects covered | Relevance to the Project |
|--|--|---|
| | | required by ESS5, a Process Framework (PF) will be prepared |
| ESS 8: Cultural heritage | The standard recognizes that cultural heritage provides a continuum of tangible and intangible forms between the past, present, and future. ESS 8 sets out material measures designed to protect cultural heritage throughout the life of a project | This standard is relevant to the project in that there will be subprojects activities that include construction/rehabilitation. During the civil works some archaeological or cultural remains may be accidentally discovered. For this reason, ESS 8 on cultural heritage is relevant for the project. The ESMF provides for the protection of cultural sites and potential archaeological finds by applying chance finds procedures in accordance with national legislation and procedures. |
| ESS 10: Stakeholder engagement and information | The standard recognizes the importance of open and transparent consultation between the Borrower and project stakeholders as an essential element of international good practice. Effective stakeholder consultation can improve the environmental and social sustainability of projects, enhance project acceptance, and contribute significantly to the successful design and implementation of projects | ESS 10 applies to the Project as all World Bank-financed projects are subject to this Standard. The Government of The Gambia will develop and implement a Stakeholder Engagement Plan (SEP) commensurate with the nature, scope and potential risks and impacts of the project. In addition, the PIU will disseminate information about the project to enable stakeholders to understand its risks and impacts, as well as its potential opportunities the project could rely upon to achieve its development objective. The PIU will engage them throughout the life cycle of the project. Finally, the PIU will propose and implement a complaints management mechanism that is conducive enough and considerate of vulnerable groups. |

1.6.3.2. World Bank Environment, Health, and Safety Guidelines (EHSG)

The World Bank Group Environmental, Health and Safety Guidelines (EHSGs) are technical reference documents, with general and industry specific examples of Good International Industry Practice (GIIP). In applying the EHS Guidelines, the proposed measures should be tailored to the hazards and risks identified for each specific subproject activity based on the results of an environmental assessment in which site-specific variables, such as host country context, assimilative capacity of the environment, and other project factors, are considered.

The following EHSG of the World Bank will be relevant to this project:

Air emissions and ambient air quality. This guideline applies to facilities or projects that generate emissions of air at any stage of the project life cycle. It complements the industry-specific emissions guidance presented in the Industry Sector Environmental, Health, and Safety (EHS) Guidelines by providing information about common techniques for emissions management that may be applied to a range of industry sectors. This guideline provides an approach to the management of significant sources of emissions, including specific guidance for the assessment and monitoring of impacts. It is also intended to provide additional information on approaches to emissions management in projects located in areas of

poor air quality, where it may be necessary to establish project-specific emissions standards. Feeder roads and small earth dams and dugouts rehabilitation to be undertaken under the project are expected to generate some level of dust. In the case of dugouts, dust generation may only be realized during the construction phase.

Hazardous material Management. These guidelines apply to projects that use, store, or handle any quantity of hazardous materials (Hazmats), defined as materials that represent a risk to human health, property, or the environment due to their physical or chemical characteristics. Hazmats can be classified according to the hazard as explosives; compressed gases, including toxic or flammable gases; flammable liquids; flammable solids; oxidizing substances; toxic materials; radioactive material; and corrosive substances. The potential use of chemical products like fuel, gas, etc. in the implementation of the Climate Change sub-project makes this guideline relevant to the project.

Waste Management. These guidelines apply to projects that generate, store, or handle any quantity of waste across a range of industry sectors. It is not intended to apply to projects or facilities where the primary business is the collection, transportation, treatment, or disposal of waste. Construction (road construction and rehabilitation) and domestic waste (from the numerous beneficiaries to be engaged) expected to be generated from various sites make this guideline relevant to the project's implementation.

Noise Management. This guideline addresses impacts of noise beyond the property boundary of the facilities or projects being implemented. Thus, it seeks to address the public health risks of noise generated from the project and not the occupational health risks. The use of the handheld compactor at both the feeder roads.

Occupational Health and Safety: This guideline provides guidance and examples of reasonable precautions to implement in managing principal risks to occupational health and safety. Although the focus is placed on the operational phase of projects, much of the guidance also applies to construction and decommissioning activities. Labor intensive public works at project sites, such as land clearing, excavation, hauling, etc. expose workers to occupational risks. The EHS Guidelines will help manage such risks.

Community Health and Safety. Specific guidelines provided under traffic safety, water quality and availability, disease prevention and construction and decommissioning presented in these guidelines are relevant to implementing sub-project activities such as feeder road and dugout canoe rehabilitation/construction. The project management should put in place appropriate measures to prevent COVID-19 from becoming a source of contamination or a vector for the spread of the virus by applying WHO and national guidelines reduce the spread of COVID-19 virus and other infectious diseases. Additionally, the project should put the mechanism to promote a health and safety environment for all, including beneficiaries.

1.6.3.3. Comparison of the Gambia's Regulations/ Policies and World Bank ESF for Handling Environmental and Social Risks

Table 6: Gap Analysis – Comparison of the Gambia's Regulations/ Policies and World Bank ESF for Handling Environmental and Social Risks

| Scope/Objective | Description of Bank Standard | Description of the National Regulation | Gaps and Bridging Actions |
|---|--|---|--|
| ESS 1: Assessment and Management of Environmental and Social Risks and Impacts | | | |
| <p>Identify, evaluate, and manage the project's environmental and social risks and impacts in a manner consistent with the ESSs.</p> <p>To adopt a mitigation hierarchy approach to:</p> <ul style="list-style-type: none"> • Anticipate and avoid risks and impacts • Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels • Once risks and impacts have been minimized or reduced, mitigate and • Where significant residual impacts remain, compensate for, or offset them, were technically and financially feasible. | <p>The standard guides the assessment of the Project's potential environmental and social risks and impacts and address potential impacts through planning, monitoring, and mitigation hierarchy approach.</p> | <p>National Environmental Management Act, 1994 and the Environmental Assessment. Regulations (EIA) of 2014 mandates that no developer shall commence a project which in the opinion of the Agency has or is likely to have adverse effects on the environment or public health unless, before the commencement, the project has been registered by the NEA and an environmental permit has been issued by the Agency in respect of the undertaking.</p> | <ul style="list-style-type: none"> - Although national legislation seeks to anticipate and mitigate/avoid risks and impacts, it does not fully address potential impacts considering the mitigation hierarchy approach, especially regarding social and gender issues particularly impacts on the vulnerable - The stakeholders at all levels, (national, regional and community) are consulted in the project preparatory stage through consultations to make them aware of project components and the roles they will play during implementation. - The capacities of the stakeholders particularly PIU staff and partners on world bank ESF will also be built at the early stage of project implementation to enable them to collaborate effectively in addressing this gap |

| Scope/Objective | Description of Bank Standard | Description of the National Regulation | Gaps and Bridging Actions |
|---|--|--|--|
| ESS2: Labor and Working Conditions | | | |
| <ul style="list-style-type: none"> To promote safety and health at work, fair treatment, non-discrimination, and equal opportunity of project workers, including vulnerable workers such as women, persons with disabilities, children. To prevent the use of all forms of forced labor and child labor. To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. To provide project workers with accessible means to raise workplace concerns. <p>OHS Hazard identification and right of employees to remove themselves from such workplaces without being punished.</p> | <p>Working age and migrant workers, contracted workers, and primary supply workers, as appropriate. It provides certain requirements that the project must meet in terms of working conditions, protection of the workforce (especially the prevention of all forms of forced and child labor), and provision of a grievance mechanism that addresses concerns on the project promptly and uses a transparent process that provides timely feedback to those concerned.</p> <p>Under ESS 2, GM will be put in place for project workers to report work situations that they believe are not safe or healthy and remove themselves from a work situation that they have reasonable justification to believe presents an imminent danger to their life or health. Project workers who remove</p> | <p>The Labor Act 2007 provides for the rights and duties of employers and workers, guarantees trade unions the freedom of associations, and establishes Labor Commission to mediate and act in respect of all labor issues. The Labor Act provides for compensation payments to workers for personal injuries arising out of and in the course of their employment.</p> <p>Labor Act 2007 details the duties of persons employed. It is not part of the duties of persons employed to remove themselves from such unsafe working places.</p> | <p>Although the Labor Commission makes provision for anticipated labor-related complaints, workers' access to the Commission is challenging at the regional level because its office is in the Greater Banjul Area with no regional representation. The Project workers will have their Grievance Mechanism set up so they can lodge their complaints in a fair and transparent manner without fear of any reprisal, and with safe and ethical procedures for SEA/SH related complaints.</p> <p>At present, there is no law that requires employers to adopt anti-sexual harassment policies in The Gambia. Therefore, employers largely rely on ordinary internal disciplinary proceedings in handling sexual harassment at workplaces which are not ideal lasting solution to sexual harassment as they usually do not focus on the survivor.</p> <p>The law does not explicitly mandate workers to remove themselves from such unsafe working places and is also silent</p> |

| Scope/Objective | Description of Bank Standard | Description of the National Regulation | Gaps and Bridging Actions |
|---|---|--|---|
| | <p>themselves from such situations will not be required to return to work until necessary remedial action to correct the situation has been taken. Project workers will not be retaliated against or otherwise subject to reprisal or negative action for such reporting or removal.</p> | | <p>on reprisal. Gambian law also doesn't have protections related to sexual harassment. The project will follow ESS2 in this respect.</p> <p>The labor law in The Gambia does not specifically address work hour limits, overtime, rest periods or work schedules in general. The Gambia prohibits the employment of children under 16 years. There are strict penalties imposed for violation of these rules.</p> |
| ESS3: Resource Efficiency and Pollution Prevention and Management | | | |
| <ul style="list-style-type: none"> To achieve the sustainable use of resources, including implementing measures that avoid or reduce pollution resulting from project activities and minimizing and managing the risks and impacts of pesticide use. | <p>The ESS3 provides requirements for projects to achieve the sustainable use of resources, including energy, water, and raw materials, as well as implement measures that avoid or reduce pollution resulting from project activities. The standard places specific consideration on hazardous wastes or materials and air emissions (climate pollutants) given that the current and projected</p> | <ul style="list-style-type: none"> The NEMA mandates the NEA to enforce compliance with establishment of EIA regulations and procedures among companies and businesses in the planning and executing development projects, including existing projects. The Act also mandates the Agency to register and manage all pesticides to ensure that the approved ones are used. The Hazardous Chemicals and Pesticide Management Act, 1999 provides for the registration and use of pesticides and related matters. | <p>The Legislation ensures that pollution is prevented, and measures are put in place by polluters through routine monitoring by regulatory agencies and institutions i.e., NEA, etc.</p> |

| Scope/Objective | Description of Bank Standard | Description of the National Regulation | Gaps and Bridging Actions |
|---|---|--|--|
| | atmospheric concentration of greenhouse gases (GHG) threatens the welfare of present and future lives. | | |
| ESS4: Community Health and Safety | | | |
| <ul style="list-style-type: none"> • To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project lifecycle • To promote quality, safety, and considerations relating to climate change in the design and construction of infrastructure, including dams. • To ensure that safeguarding personnel and property is carried out to avoid or minimize risks to the project-affected communities. | <p>This standard recognizes that project activities, project equipment and infrastructure increase the exposure of project stakeholder communities to various health, safety and security risks and impacts and thus recommends that projects implement measures that avoid or limit the occurrence of such risks. It provides further requirements or guidelines on managing safety, including the need for projects to undertake safety assessment for each phase of the project, monitor incidents and accidents and preparing regular reports on such monitoring. ESS4 also guides emergency preparedness and response.</p> | <p>The Public Health Act provides for the prevention of disease, promotes, safeguards, and maintains and protects humans and animals' health and provides for related matters. The Act enjoins the provision of sanitary stations and facilities, destruction of vectors including mosquitoes, protection of water receptacles, and promoting environmental health and sanitation.</p> | <p>The Act does not consider the assessment of workplace safety. Additionally, no adequate measures are in place to deal with occurrences and emergencies.</p> <p>ESS3 provides the platform to engage with stakeholders. A Stakeholder Engagement Plan has been prepared and will be implemented prior to the start of project activities. Community needs concerning project activities will be assessed and necessary measures are taken. The project will take into consideration emergencies and COVID-19 Response Plan to guide project implementation on site.</p> <p>The provisions of ESS3 will apply</p> |

| Scope/Objective | Description of Bank Standard | Description of the National Regulation | Gaps and Bridging Actions |
|--|--|---|--|
| ESS 5: Land Acquisition, Restriction on Land use and Involuntary Resettlement | | | |
| This aims to avoid involuntary resettlement, forced eviction, and aims to mitigate unavoidable adverse social and economic impacts from the land acquisition or restrictions on land us | <p>-PAPs with the formal legal rights to land or assets have to be compensated for any losses.</p> <p>-PAPs who do not have formal legal rights to land or assets but have a claim to land or assets that is recognized under national law, including claims derived from customary or traditional tenure arrangements are eligible for compensation.</p> <p>- PAPs with no recognizable legal right or claim to land or assets are compensated for loss of non-land assets and provided with resettlement assistance.</p> | <p>Provides for compulsory acquisition of land for public purpose and subsequent payment of compensation but only provides for compensation of assets.</p> <p>-Recognizes only PAPs with legal title for compensation</p> <p>- Use of the legal system to address grievance/complaint</p> <p>-Squatters are not entitled to compensation.</p> | <p>Gaps:</p> <ul style="list-style-type: none"> - The rights of squatters are not recognized. No requirement of GM to address grievances - No requirement to prepare RAP <p>To address these gaps, the ESS5 will apply. Including the project will adopt a Project-level GM.</p> <p>Judicial process will be available for grievances</p> <ul style="list-style-type: none"> - Provision of land for land compensation option |
| ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources | | | |
| <ul style="list-style-type: none"> • To protect and conserve biodiversity and habitats. • To apply the mitigation hierarchy and the precautionary approach in the design and implementation of | ESS6 promotes the conservation of biodiversity or natural habitats and supports the protection and maintenance of the core ecological functions of natural habitats and the biodiversity they support. | The Forest Act and Biodiversity and Wildlife Act aim at the conservation and sustainable development of forest and wildlife resources for environmental sustainability and continuous supply of ecosystem services whilst fulfilling Gambia's commitments under international agreements and conventions. | There are no major differences between national legislation and ESS6 |

| Scope/Objective | Description of Bank Standard | Description of the National Regulation | Gaps and Bridging Actions |
|--|--|--|--|
| <p>projects that could impact biodiversity.</p> <ul style="list-style-type: none"> To promote the sustainable management of living natural resources. To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, by adopting practices that integrate conservation needs and development priorities. | <p>It also encourages projects to incorporate into their development, environmental and social strategies that address any major natural habitat issues, including identification of important natural habitat sites, the ecological functions they perform, the degree of threat to the sites, and priorities for conservation.</p> | | |
| ESS8: Cultural Heritage | | | |
| <ul style="list-style-type: none"> To protect cultural heritage from the adverse impacts of project activities and support its preservation. To address cultural heritage as an integral aspect of sustainable development. To promote meaningful consultation with | <p>This standard requires that the ESA considers direct, indirect, and cumulative risks and impacts on tangible or intangible cultural heritage. Impacts on cultural heritage are to be avoided and the mitigation hierarchy applied. A chance finds procedure will be designed to ensure that any encountered,</p> | <p>The Gambian Constitution (1997) as well as the <i>An Act to establish a National Council for Arts and Culture and to make provision for other matters connected therewith 1989</i>,²¹ and recognizes culture as a necessary tool for national integration and development. The State shall take steps to encourage the integration of appropriate customary values into the fabric of national life through formal and informal education and the conscious introduction of cultural dimensions to relevant aspects of national planning. (2) The State shall ensure that appropriate customary and cultural values are adapted and developed as an integral part of the growing needs of the society as a whole; and, that traditional practices which are injurious to the health and well-being of the person are abolished. (3) The State shall foster the development of Gambian culture.</p> | <p>The regulations and policies do not address cultural heritage as an integral part of sustainable development and promotion of equitable sharing of benefits</p> <p>ESS8 provides for the preparation of frameworks for managing biodiversity resources and cultural heritage in situations where these resources are likely to be adversely affected by project activities.</p> |

²¹ https://en.unesco.org/sites/default/files/gambia_act_1989_engorof.pdf

| Scope/Objective | Description of Bank Standard | Description of the National Regulation | Gaps and Bridging Actions |
|--|---|--|---|
| stakeholders regarding cultural heritage. <ul style="list-style-type: none"> To promote the equitable sharing of benefits from the use of cultural heritage. | previously unknown cultural heritage, is appropriately managed. | | The provisions of ESS 8 will apply |
| ESS10: Stakeholder Engagement and Information Disclosure | | | |
| To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, particularly project-affected parties. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance <ul style="list-style-type: none"> To promote and provide means for effective and inclusive engagement with project-affected parties on issues that could potentially affect them throughout the project life cycle. | The standard establishes a systematic approach to stakeholder engagement that helps the Borrower to identify stakeholders and build and maintain a constructive relationship with them; as well as disclose information on the environmental and social risks and impacts to stakeholders in a timely, understandable, accessible, and appropriate manner and format. Stakeholder engagements are to commence as early as possible in the project development process and continue throughout the lifecycle of the Project. ESS 8 also provides for a grievance mechanism to receive and facilitate the | <ul style="list-style-type: none"> The laws most relevant to stakeholder engagement are: The 1997 Constitution recognizes the right to information for all citizens as a fundamental human right. To fully operationalize the right to information, people need to be effectively engaged and provided with information on issues that affect their lives. The Access to Information Act, 2020 which was also passed into law in 2021 by the Gambian parliament Gambia Environmental Assessment Regulations (2014) and National Environmental Management Act (NEMA), also consider stakeholder engagement to be an integral part of the Environmental Impact Assessment process. | The national laws do not give a clear procedure for information disclosure The acts do not include a GM for addressing complaints and grievances that the stakeholders may have in respect of the information provided. Stakeholder engagement is also a continuous activity throughout project implementation ESS8 shall apply <ul style="list-style-type: none"> |

| Scope/Objective | Description of Bank Standard | Description of the National Regulation | Gaps and Bridging Actions |
|---|---|--|---------------------------|
| <ul style="list-style-type: none"> • To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate manner and format. • To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond and manage such. | <p>resolution of concerns and grievances.</p> | | |

1.6.4. Institutional framework

The following institutions will be involved in the implementation of the project:

Table 7. Institutions relevant to the Project

| Institutions | Responsibilities |
|---|--|
| Ministry of Tourism and Culture (MoTC) | The Ministry of Tourism and Culture is responsible for national policy formulation and strategic planning for tourism and culture. It is responsible for the promulgation of legislation in the tourism sector, advising the executive on matters of tourism and culture, monitoring the tourism sector's performance, and acting as liaison with government agencies, international donor agencies, the private sector, and non-governmental organizations (NGOs) on matters relating to tourism and culture. The Ministry will have oversight responsibilities for the implementation of the project |
| Gambian Tourism Board (GTB) | It is the institution mandated by government to promote the Gambian tourist destination. The agency is responsible for promoting foreign and local investment in the tourism industry as well as advising the tourism sector and markets. They also work in cooperation with private partners to develop sustainable tourism products and services. |
| National Center for Arts and Culture (NCAC) | The NCAC is a semi-autonomous institution established by an Act to promote and develop Gambian culture. It is the highest official decision-making body on all matters relating to arts and culture in the country. As such, it will strategically guide the project to revamping this subsector and provide an environment for the full participation of all stakeholders in the subsector. Its functions include: i) advise the minister on matters of policy relating to arts and culture; ii) promote and develop Gambian art and culture; iii) promote artistic and cultural cooperation at regional and international levels; and iv) encourage, at the local level, the emergence of groups and institutions interested in the promotion of art and culture. |
| Gambia Tourism and Hospitality Institute (GTHI) | It is a training institute specializing in the training of staff for the hotel and tourism industry. |
| Ministry of Women, Children and Social Welfare | The Ministry is responsible for implementing government policy on all matters affecting the development and welfare of women, children and the vulnerable in society. Ministry will be part of the Grievance Resolution Committee (GRC) within the Grievance Mechanism to oversee issues related to SEA/SH. The Women's Bureau will train members of GRC on SEA/SH; and will play an active role in coordinating and overseeing the referrals and provision of services using its experience and ability to support survivors of GBV. |
| NEA | The NEA enforces the NEMA, 1994 and EIA Regulations 2014 including sub-project classification, approves environmental statements and monitoring sub-project ESMPs, etc. This responsibility could be delegated to a private entity, if necessary, but in consultation with the Agency |
| Ministry of Lands and Regional Administration | Oversees all the local government authorities and enforces all legal regulations on land administration and land use. Its regional representatives are the TACs located in the offices of the Regional Governors. The TACs will support the implementation and monitoring processes of the Project at the Regional level |
| Ministry of Health | Responsible for overall formulation and direction of the national health agenda, planning and health infrastructural development. Local health facilities will potentially manage the Project's health and safety risks such as the impacts of air |

| Institutions | Responsibilities |
|--|--|
| | and water pollution on the populations ; malaria and other water-borne diseases due to long-term inundation of rice fields |
| Department of Forestry (DOF) | Gazetted Forest Parks are in various parts of the country, some of which could be impacted by the Project (component 2: Infrastructure support for the diversification and resilience of the tourism, and possibly under component 1B under the matching grant scheme). DOF will therefore monitor project activities near forested areas to maintain national forest cover. |
| Department of Parks and Wildlife Management (DPWM) | Loss, fragmentation, and degradation of habitat through land clearance for agriculture, or new roads and upgrading of existing roads may be avoided or minimized with advice from DPWM. |

2. PROJECT AREA ENVIRONMENTAL AND SOCIAL DATA

The description and analysis of the baseline data of the projection intervention zone includes the biophysical and the human environment. This chapter therefore describes each of the environments (physical, biological, and human) according to the information available in the literature review, information from field visits, interviews with stakeholders and additional mapping (GIS) work.

2.1. Background and context

The Gambia lies between 13.79° and 16.82° West longitude and entirely within 13° North latitude. It has an estimated area of 11,000 km² making it the smallest country in mainland Africa. It is bounded by Senegal to the North, South, and East and by the Atlantic Ocean to the West. The country is widest at its westerly end towards the ocean, narrowing to about half this width at its eastern tip, 480 km inland. The country is bisected by the River Gambia that originates from the Fouta Djallon highlands and runs from East to West into the Atlantic Ocean. The Gambia lies entirely within the drainage basin of the Gambia River, a basin that extends well into Senegal and Guinea

2.2. Project intervention area location

The project will intervene along the Atlantic Coast where most tourism activities are located, and some select tourism destinations upcountry. Specific activities related to destination development and improving MSME capabilities will be determined during project implementation. Potential sites under consideration include: Abuko Reserve (Western River), River Gambia National Park (Kiang West) and Bijilo National Park (West Coast) (see figure 1a below).

The rich coastal **Bijilo Forest Park** (or Monkey Park), a fenced woodland gazetted in 1952, covers an area of 51.3 ha south of the Senegambia area of Kololi. It consists mainly of closed canopy forest with a significant number of *Borassus akeassii* palms. The Park opened to the public in 1991 with over 23,000 visitors per year. It lost part of its reserve status in 2018 during the construction of Sir Dawda Kairaba Jawara International Conference Center. It has diverse fauna of invertebrates, reptiles, and mammals, including green monkeys, Temminck's red colobus, Campbell's mona monkey, and patas.

Abuko National Park is located south of Abuko town, is a popular tourist attraction and was the country's first designated wildlife reserve. It has a wide variety of monkey species and other vertebrates and several types of rodents, including cane rats. Typical trees, up to 6.1m high, are: oil palm, mahogany, iroko and *anthocleista procera*.²²

River Gambia National Park, established in 1978, is in Niamina East district of Central River Division. The Park includes the 585 ha Baboon Islands is typical of a tropical rainforest in the form of a riparian forest. Unfortunately, the Gambia's coastal zone, consisting of 80 km of open ocean coast and 200km sheltered coast, is prone to flooding and erosion. With the Gambia River dividing the country into two banks, and tidally inundated swamps covering 20 percent of the country, the Gambia River ecosystem is at risk of permanent flooding by a sea level rise of 1m. The manifestation of climate change in the coastal areas includes coastal erosion and loss of or submerged beaches.

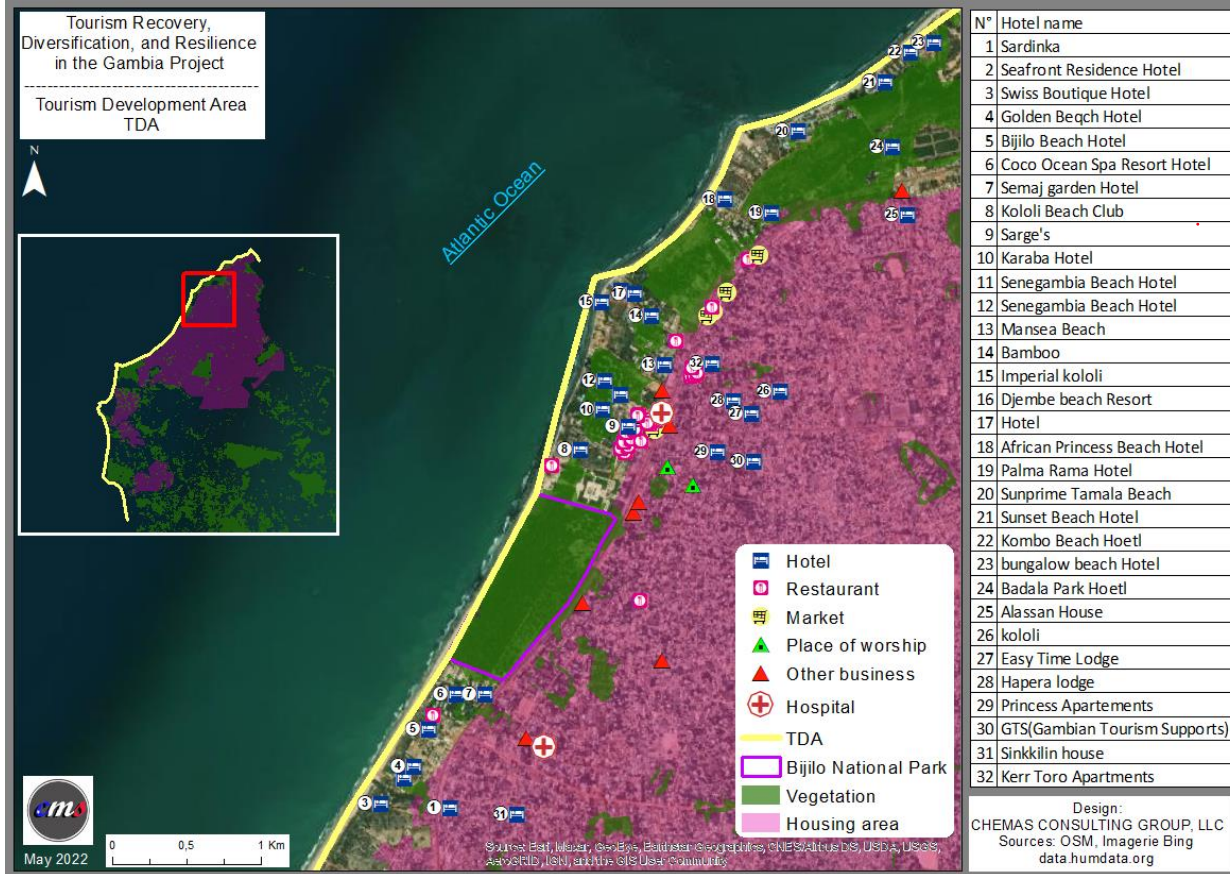
The project is planning to support the rehabilitation of existing tourism assets, such as the UNESCO World Heritage Site (WHS) of Kunta Kinteh Island and Related Sites (see figure 1b below). The site is an ensemble that consists of a series of sites, in seven separate locations, associated with the early European

²² An unarmed, evergreen tree growing 6 -20 meters tall.

occupation of the African continent: the whole of Kunta Kinteh Island, the remains of a Portuguese Chapel and of a colonial warehouse (CFAO Building) in the village of Albreda, the Maurel Frères Building in the village of Juffreh, the remains of the small Portuguese settlement of San Domingo, as well as Fort Bullen and the Six-Gun Battery. Fort Bullen and the Six-Gun Battery are at the mouth of The Gambia River, whilst Kunta Kinteh Island and the other sites are some 30 km upstream. Under Component 2, there are planned erosion control works at the Kunte Kinte Island. A Cultural Heritage Management Plan will be prepared as part of the ESMP for the planned interventions. The E&S screening of subcomponents 2 but also 1B will enable to properly guide on the extent and depth of the required studies. The National Council for Arts and Culture (NCAC) is a major stakeholder in the World Heritage Site. The NCAC will Inform the World Heritage Committee, through its Secretariat in UNESCO, of the planned project interventions at the Kunta Kinteh Island in accordance with The Gambia's commitments under the World Heritage Convention. The interventions on the WHS will be fully aligned with the site Conservation Management Plan.

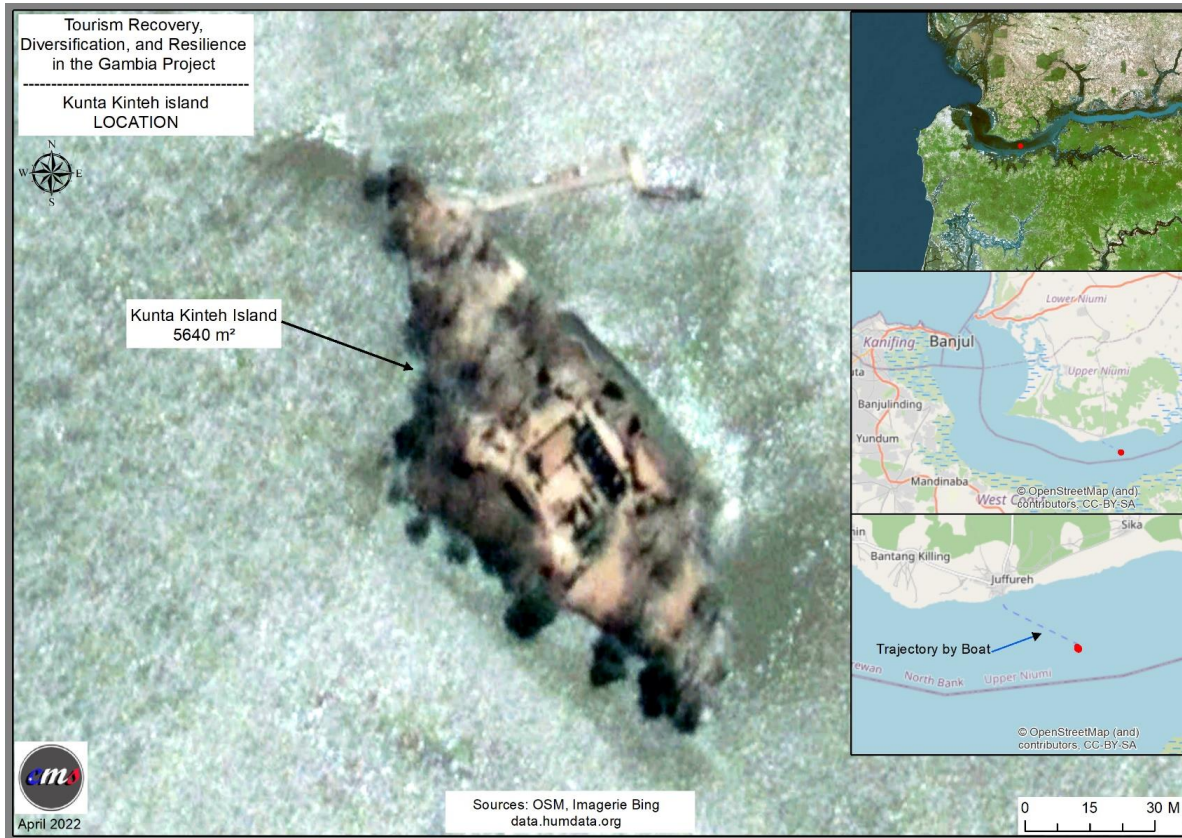
It is likely that cultural heritage could be encountered during the implementation of construction/rehabilitation activities. The ESMF assesses the probability of cultural heritage present in the project area including underwater heritage. The project intends to rehabilitate a handful of classified world heritage site such as the kunta Kinteh island and other sites like in Juffrey, in the Gmbian national river Park, Bijilo and Abuko reserve, etc. Undertaking such activities would de facto require the preparation of a Cultural Heritage Management Action Plan (CHMAP). The ESMF contains Chance Finds procedures which will be also included in the ESMPs and the CHMAP and subsequently in bidding documents and contracts to further guide the management of cultural heritage that may be encountered during civil works.

Figure 1a. Project intervention area in the Greater Banjul Area



Source: CHEMAS Consulting Group, LLC, Gambia Field mission, February 2022

Figure 1b. Kunta Kinteh World Heritage site



Source: CHEMAS Consulting Group, LLC, Gambia Field mission, February 2022

2.3. Biophysical characteristics

2.3.1. Climate

The Gambia has a Sudano-Sahelian type of climate characterized by a distinct rainy and dry season - a long dry season from October to early June and a short rainy season from mid-June to early October²³. Monsoon circulation over West Africa, correlated to Sea Surface Temperature (SST) in the Gulf of Guinea and modulated by the strength and location of the African Easterly Jet (AEJ), determines the character of the unimodal rainy season lasting from June to October. Annual rainfall decreases roughly from South to North, with insignificant geographical differences in variability (Figure 2). Temperatures on the other hand increase with distance from the Atlantic coast. Seasonal Northeast trade winds, known as Harmattan, also have an associative relationship with atmospheric circulations and are notable for their chill factor, and significant amounts of dust picked up from the margins of the Sahara Desert (Figure 2).

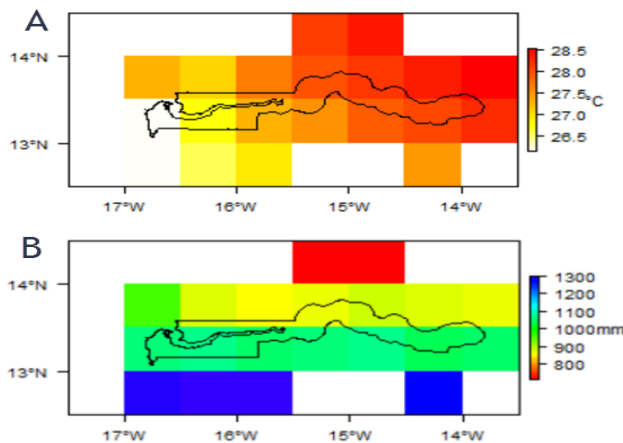


Figure 2. (A) The distribution of temperature in the Gambia (°C); and (B) The distribution of rainfall (mm per year).

Annual average rainfall ranges from 850 mm to 1,200 mm, and average temperatures range from 18 °C to 33 °C. The relative humidity is around 68% along the coast and 41% inland during the dry season and generally over 70% throughout the country during the wet season. Besides shifting precipitation patterns, sea level rise threatens to inundate forest and mangrove areas and increase salinity levels in the River Gambia estuary.

²³Malanding S. Jaiteh and Baboucarr Sarr 2012. Climate Change and Development in the Gambia - Challenges to Ecosystem Goods and Services. Center for International Earth Science Information Network (CIESIN), The Earth Institute, Columbia University. USA

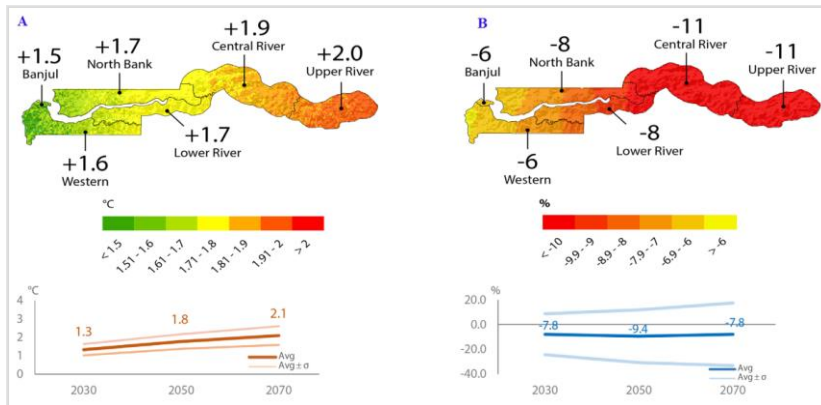


Figure 3. Projected changes in temperature and precipitation in the Gambia by 2050 as manifested by changes in annual mean temperature in °C (A); and changes in annual total precipitation in % (B) (see FAO 2018)²⁴.

The effects of climate change are already palpable in The Gambia as evidenced through changes in annual mean temperature, and changes in annual total precipitation (Figure 3). Since 1960, The Gambia has experienced increasingly erratic rainfall patterns, higher intensity storms, intra-seasonal drought, and increasing average air temperatures, accompanied by periodic cold spells and heat waves²⁵. Available literature points to an increased average temperature between 3 and 4.5°C, bringing with it an increase in potential evapotranspiration by 2075²⁶. Concerning projected rainfall, GCM model outcomes vary widely between -59% and +29% of the 1951- 1990 average of 850 mm per annum²⁷. It is also reported that the low-lying topography of the country coupled with a 1 m rise in sea

²⁴FAO; ICRISAT; CIAT. 2018. Climate-Smart Agriculture in the Gambia. CSA Country Profiles for Africa Series. International Center for Tropical Agriculture (CIAT); International Crops Research Institute for the Semi-Arid Tropics (ICRISAT); Food and Agriculture Organization of the United Nations (FAO). Rome, Italy. 20 p.

²⁵Urquhart, P. 2016. National Climate Change Policy of the Gambia Final Report: Final Draft Policy

²⁶Yaffa, S. 2011. Assessment of the Impacts of Climate Change on Gambian Smallholder Food Crop Production and Livelihood Conditions, ActionAid the Gambia.

²⁷Yaffa, S. 2011. Ibid.

level could potentially inundate over 8% of the country's land area. This includes over 61% of current mangroves, 33% of swamps, and over 20% of current lowland rice growing areas²⁸.

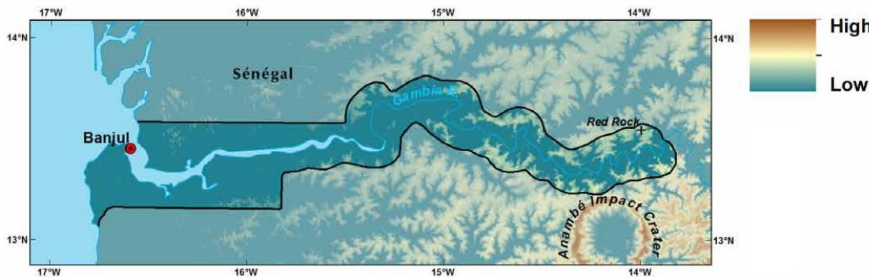


Figure 4. Shaded relief of the Gambia showing the predominance of low relief forms ²⁹

With nearly 50 percent of its total land area under 20 meters above mean sea level, one-third at or below 10 meters above sea level, and 10 to 20 percent seasonally or diurnally flooded, The Gambia has little pronounced topographic features to boast of (see Figure). Indeed, its low elevation puts some areas of the country such as the capital city of Banjul and many areas along the banks of the River Gambia at significant risk from sea level rise.

2.3.2. Relief and geomorphology

Generally, the topography of The Gambia is flat with little difference in altitude between the east and west, although the eastern part is hillier (elevation ranging between 50-60 meters) than the western portion; this is due in part to the River Gambia, which runs through the entire length of the country cutting deep valleys in the upper reaches as it flows towards the west. The western part is flatter, the deep valley giving way to wider flood plains as it empties into the Atlantic Ocean.

Overall, the topography is dictated by the River Gambia, and this has resulted in the following types of landforms:

- **Low hill landform:** this is found mainly in the eastern portion of the country, and the hills are generally dome hills with even peaks and steep slopes, with elevation of 40-60m. There are sheer cliffs on both sides of the river as a result of erosion and cutting of the banks leading to creation of deep valleys in the upper reaches of the river
- **Fluvial landform:** this consists of flood plains formed on both banks of the river at the middle reaches. These consist mainly of gravel, sand, and clay layer
- **Marsh and plain landform:** this type is found towards the west of Mansa Konko in the LRR on both sides of the River Gambia, with an altitude of 5m and a width of 1-5km
- **Coastal landform:** this is characterized by craggy promontories, and broad, flat, and sandy areas

2.3.3. Water resources

The River Gambia is a dominant hydrological feature of the country and flows from east to west for about 400 km. Along the river, the width of the valley varies from 20 to 40 km, and three major sections may be distinguished: (i) The Upper Valley (UV), where floods occur occasionally, and the water is always fresh. (ii) The Central Valley (CV), where tidal influence exists, but the water is also fresh. In the

²⁸Yaffa, S. 2011.

²⁹ Permanent Interstate Committee for Drought Control in the Sahel (Comité permanent inter-État de lutte contre la sécheresse au Sahel or CILSS. Landscapes of West Africa – A Window on a Changing World. U.S. Geological Survey EROS, 47914 252nd St, Garretson, SD 57030, USA: 2016

lower CV water is fresh only during the rainy season while in the dry season, when the salt tongue moves as far as 250 km upstream, it becomes brackish. Thus, in the dry season, about 220 km of freshwater are left in the Central and Upper River Region. (iii) The Lower Valley (LV) in the Central River Region, where water is occasionally saline because of permanent tidal influence.

It is a major waterway and tourist attraction. Its floodplains, riverbanks, and wetlands are important habitats for wildlife and play an important role in local livelihood strategies. Its flow is highly seasonal. The maximum flow occurs at the end of the rainy season in late September or October with a flow of about 1 500 m³/s; the minimum dry season flow is less than 4.5 m³/s. Both measurements are taken at Gouloumbo in Senegal. Because of the flat topography, there is a pronounced marine influence and the river's seasonality, and the salinity has important repercussions on land use.

The country's total actual renewable water resources are estimated at 8 km³/year, of which about 3 km³ are internally produced, and the remaining 5 km³ represent the inflow of the River Gambia from Senegal³⁰. It is estimated that internally produced groundwater amounts to about 0.5 km³/year, all of which is drained by the River Gambia and becomes the base flow of the river. Groundwater is available in all parts of The Gambia. The country is in one of Africa's major sedimentary basins and is often referred to as the Mauritania/Senegal Basin. It is characterized by two main aquifer systems with water table depths varying from 10 m to 450 m.

2.3.4. Biological environment

2.3.4.1. Vegetation

The following vegetation types are found in the various potential Project locations of the selected Regions:

➤ **Riparian Vegetation**

A riparian vegetation or riparian woodland is a forested or wooded area of land adjacent to a body of water such as a river, stream, lake, marshland, estuary, or reservoir. This vegetation type is found in areas with swampy and marshy environments such as the wetlands. The vegetation within these areas includes reeds, shrubs, and herbaceous plants; it is likely that some Project activities will be located in parts of these habitats and vegetation, especially along the banks of the River Gambia in the northern part of LRR and CRR-N/S.

➤ **Mangrove Vegetation**

One of the main habitat types along the "bolongs" in the northern part of the LRR is the mangrove habitat; it is found lining up the banks of the River Gambia and tributaries, and communities along the river system carry out rice farming within the mangrove swamp along the banks of the river. The species found are mainly the red mangrove (*Rhizophora spp.*), and the white mangrove (*Avicennia sp.*). In addition to rice farming, the communities utilize the mangrove as roofing material and other house construction activities, which increase the pressure on the vegetation. This eventually impacts the fauna, especially the Red Colobus monkey (*Colobus badius temminckii*) that inhabits the mangrove ecosystem.

➤ **Wooded Savannah**

The wooded savannah is defined as having a canopy cover of more than 40 percent and reaching a height greater than 8m and is found within most of the potential project locations within the three Regions. This ecosystem is usually found in the upland areas. The dominant species found within this vegetation type are the African locust beans (*Parkia biglobosa*), locally called "nete", its pods contain both a sweet pulp and valuable seeds, very popular as food within the villages. The seeds are crushed and fermented and constitute an important economic activity. In addition, various parts of the locust bean tree are used for medicinal.

³⁰Aquastats database: The Gambia. FAO, Rome. Accessed on 21/12/2018

2.3.4.2. Forest and park

Gambia's forest cover includes woodlands, savannah woodlands, mangroves, and plantations. These forests supply most of the Gambian population with much-needed forest products for domestic and commercial use including environmental protection. The total forest cover of the country is about 350,000 ha of which approximately, 32,734 ha are Forest Parks, 30,000 ha mangroves and the rest are natural forests. They are broadly categorized into three types, based on either for production, protection or based on their functions as follows:

- State forests, which include sixty-six gazetted Forest Parks and natural forests (protection)
- Participatory managed forests which include Community forests (protection)
- Private forests, which include private natural forests (protection) and private plantations

Their environmental functions include soil erosion control, regulation of water quality and flow in watersheds, thereby moderating floods from heavy rain. Forests also have a unique potential to contribute to climate change mitigation by reducing emissions and enhancing carbon sinks, and depending on the extent of deforestation, reduced tree cover may result in reduced cloud cover and rainfall.

2.3.4.3. Protected Areas

The first Protected area to be established in The Gambia was Abuko Nature Reserve, which was gazetted in 1968. This prompted the government to set up a Wildlife Conservation Unit under the auspices of the office of the President, to give it weight and recognition. This action demonstrated The Gambia's commitment to wildlife conservation and management. Since then, a further 5 areas around the country have been gazetted as Protected Areas due to the unique or endangered nature of the biodiversity they contain.

Since 1968, the Government has created eight national parks:

- Abuko Nature Reserve
- River Gambia National Park
- Nuimi National Park
- Tanji Bird National Park
- Niumi National
- Kiang West National Park
- Bao Bolong Wetland Reserve
- Jokadu National Park

Abuko Nature reserve and River Gambia National Park are part of the project area.

- **Abuko Nature Reserve**

Abuko Nature Reserve is situated outside the village of Lamin in Kombo North District, 25 km from Banjul. The reserve has been protected as a water catchment area since 1916. It was officially declared a nature reserve in 1968. In 1978, a further 29 ha were added to the original 77 ha, bringing it up to its current size of 106 ha. The reserve is rectangular in shape, centered on the Lamin stream which surfaces within the lower half of the reserve.

The central portion of the reserve is composed of gallery forest which surrounds a chain of 3 pools. The dense evergreen forest progressively gives way to guinea savannah the one moves away from the water course, which has a grass herb dominated understory. Through the wet season (June to October) the grass grows to almost 2m, but as the dry season progresses it dies back. Within the extension to the reserve is grassland and guinea savannah much enjoyed by many savannah bird species and mammals. Despite its small area, the reserve is also home to a wide diversity of mammals, birds, and invertebrates. This is due primarily to its variety of habitat types coupled with the fact that the area was protected in a relatively intact state.

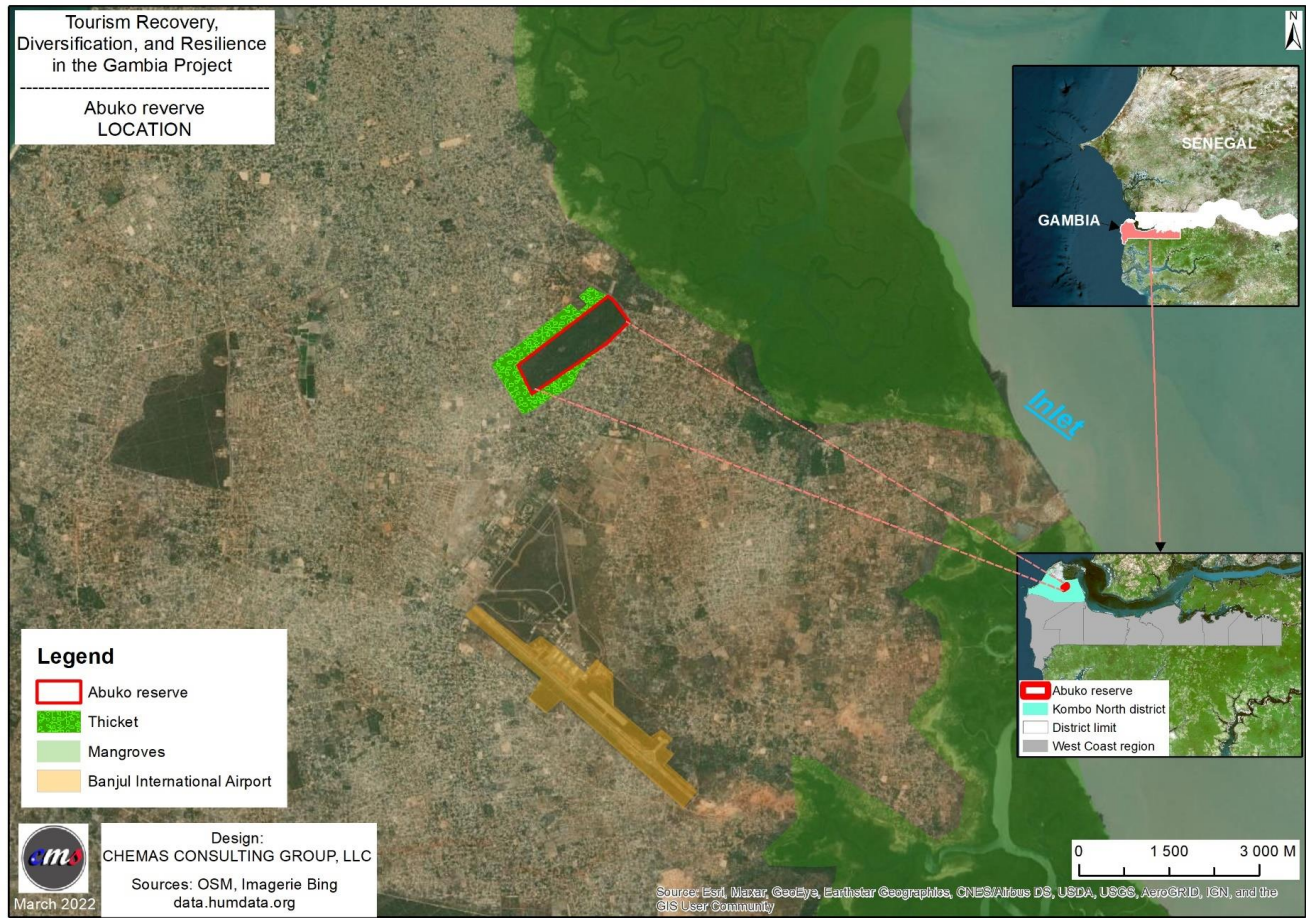


Figure 5: Abuko reserve location

- **Natural Areas**

Abuko Nature Reserve contains a number of flora, fauna, and avifauna of The Gambia that reflects the country's rich biodiversity. The pools³¹ in the northeast end of the reserve hold a substantial population of Nile crocodiles, and attract a wide variety of birds and mammals, especially during the dry season. The pools also contain a lot of fish species and adjacent to these are the seasonally flooded areas in the gallery forest, which are occupied by the Dwarf Crocodiles.

- **Education Center**

The Reserve also has an education center, which focuses on awareness raising and advocacy. Other facilities include the animal orphanage, a temporary home for animals and birds that had been held in captivity or living without both parents. The Department of Parks and Wildlife Management has an ongoing program of confiscating captive wild animals- the most common of these are primates and parrots. These animals are kept at the orphanage, trained, to get accustomed to their natural environment and then they are released back into their natural habitats.

- **Habitat Type- Gallery Forest**

Abuko Nature Reserve contains one of the few remaining intact examples of gallery forest in The Gambia. A gallery forest is characterized by evergreen forest with a closed canopy and open understory. The canopy can grow to an excess of 30 meters in height. Gallery forests are a limited habitat type in the Gambia. It is found only in Abuko, Pirang Forest Park and in a narrow fringe along the river where the water is fresh where river water is brackish (salty) mangrove occurs.

It is similar in structure to a rainforest. The main difference is that it relies on surface water as its primary source of moisture, while rain forest depends on precipitation. Since the existence of gallery forest is dependent on the presence of surface water, it is only found in areas where there is either a high ground water table or a freshwater source (ex along freshwater reaches of the River Gambia).

- **Fauna**

Four species of primate occur in the reserve: the Western Red Colobus Monkey, the Callithrix Monkey (formerly known as the Vervet), the Patas Monkey and the Senegal Bushbaby. Other mammals present include Senegal and Blotched Genets, Bush Buck, Maxwells's Duiker, Gambian Red-Legged Sun Squirrel, Striped Ground Squirrel, Crested Porcupine, bats, and a variety of rodents. Reptiles include Nile and Dwarf Crocodile, Nile and Boscs Monitor, Agama Lizard, various skinks and geckos, African Rock Python, Puff Adder, Black-necked Cobra and Green Mamba.

- **Avifauna**

Over 270 species of birds have been recorded from Abuko Nature Reserve which reflects the value of this small area. The reserve contains an intact pocket of gallery forest in which numerous forest dependent species occur such as the Green Turaco, Little Greenbul and the Yellow Breasted Apalis. The Milky (Or Verreaux's) Eagle Owl is also resident and often heard calling in the late afternoon. The chain of pools within the lower end of the reserve attracts a tremendous variety of bird life, from the White-Spotted Fluff tail to African Fish Eagles.

- **Challenges**

- Inadequate staff and capacity
- Lack of big five animals (Lions, Buffalo, Rhino, Giraffe and Elephants)
- Intrusions by people of surrounding communities especially football players
- Erosions taking place within the park
- Bushfires within the park

³¹ The term "pools" refer here to some naturally made earth-pools (i.e., swamp) where Nile and dwarf crocodiles are being kept and raised for the purpose of the park. These earth-dams (pools) are filled with a mix of sea and rain waters.

- **The River Gambia National Park**

The River Gambia National Park (also known as Baboon Island) is a complex of five islands (total area of 585ha) and was gazetted in 1978. All the islands are quite flat and possess mainly gallery forest with some open swampy or savannah areas. The Park is situated in Central River Region about 300 km by road from Banjul. It forms one of the last refuges for the very threatened Hippopotamus within The Gambia. Since 1979 a Chimpanzee Rehabilitation Project (CRP) has been run on the islands, and there are currently about one hundred and thirty-nine (139) chimpanzees living on 3 of the larger islands. The population is steadily increasing through births. In addition to reintroducing an indigenous species to the country, the existence of the project in the River Gambia National Park has assisted in protecting the forest and its resources from over-exploitation. The Department of Parks and Wildlife Management and the CRP work hand in hand for the protection of the park and its environment.

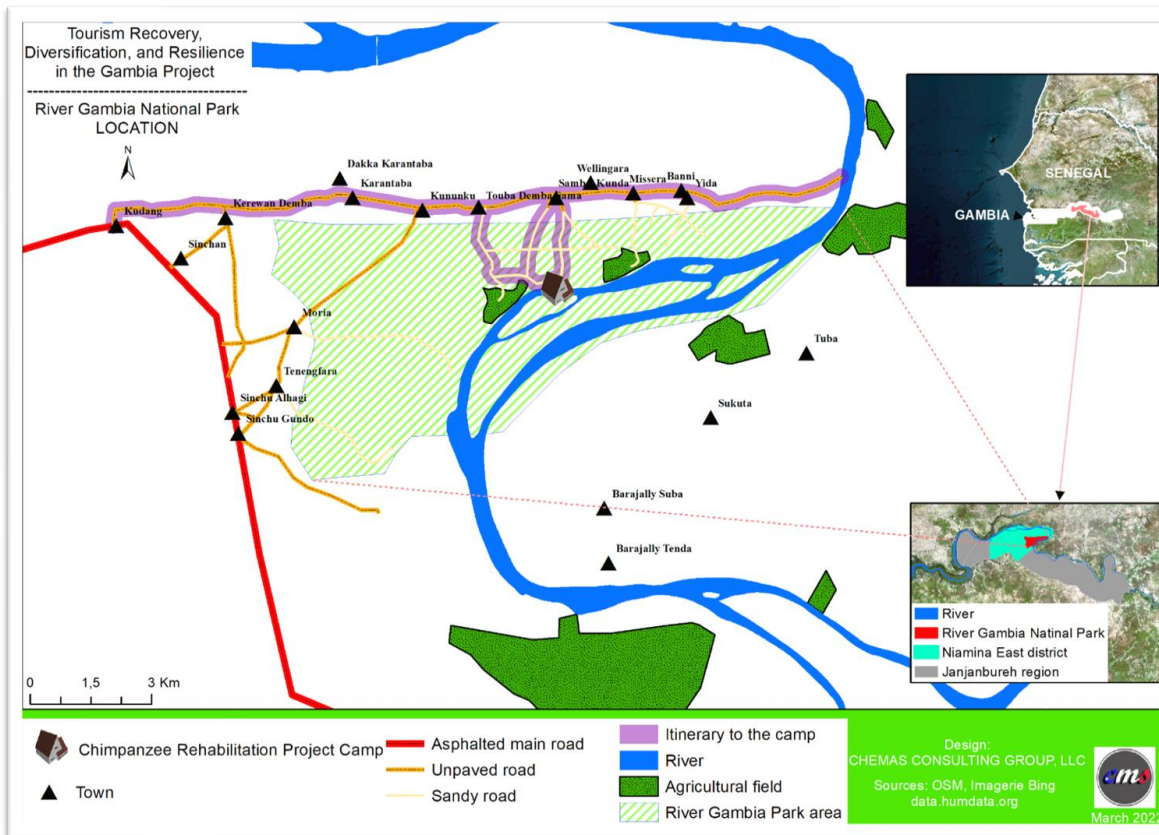


Figure 6: River Gambia National Park location

- **The Chimpanzee Rehabilitation Project (CRP)**

Background: The chimpanzee (taxonomic name: pan troglodytes) is already extinct in much of its former range and endangered in the remaining countries it inhabits. The species disappeared from the Gambia in the early 1900's. The CRP is a private organization, which provides natural life for chimpanzees caught during illegal trading and confiscated by government authorities. Rehabilitation is a long-term process requiring much time and care for the orphans to recover, both emotionally and physically from capture. During this period the orphaned animals learn or improve survival skills, including foraging for food, building nests, and responding appropriately to hazardous animals or predators. Their adaptation is closely studied both before and after release into the natural habitat. There are presently 139 chimpanzees living free on three islands in four social groups.

Education: The CRP has successfully created a community of chimpanzees comparable in size and behavior to existing wild populations. As such, the project is currently faced with the same problems of protection as other organizations attempting to preserve wild chimpanzee groups. To this end, the CRP operates an education program.

2.3.5. Fauna

The most abundant mammals are common Warthogs. Primates are by Chimpanzee, Guinea Baboon, Callithrix Monkey, Western Red Colobus – the Guinea Baboon is by far the most plentiful. Among the other species that are known to occur are the Aardvark, the Ratel, Serval, Genets, African Clawless Otter and West African Mongoose, the Nile Crocodile and Hippopotamus. Antelope species identified include Bushbuck, Maxwell's, and Bush Duikers.

Reptiles are plentiful, snakes and lizards being fairly frequently encountered. The avi-fauna of the park is very rich and varied. Egrets, herons, and ibis are particularly well represented. One satellite islet of just a few acres provides a nesting site for many thousands of breeding egrets, herons, cormorants, Sacred Ibis, weavers, and doves which all nest near each other.

2.3.6. Marine dynamics and coastal erosion

The current climate system in which The Gambia is situated is suffering from the effects of changes in the manifestation of climatic events. This climatic context exposes populations and natural systems to various climatic risks that constitute a threat to survival and sustainable development.

Indeed, The Gambia, and in particular the Greater Banjul region, is exposed to natural hazards, mainly coastal erosion, and flooding, which cause significant economic and social damage to the country. With climate change expected in the future, these problems will become even worse if no action is taken.

Human development, or anthropology of the coast, is an element that increases vulnerability to hazards by influencing the dynamics of the coastal system. The combination of rapid and poorly controlled coastal development, the increased vulnerability of the territory and the increase in sea level as well as the magnitude and frequency of storms create a situation of high vulnerability of coastal populations.

Poor infrastructure and degradation of coastal resources, due in part to sea level rise and coastal erosion, as well as poor planning and environmental practices by tourism businesses, hinder existing attractions and undermine both the competitiveness and resilience of the sector. The west coast, which concentrates much of the "sun and sand" tourism, has experienced severe erosion in recent decades. The manifestation of climate change in coastal areas could exacerbate coastal erosion and increased risk of submergence of beaches critical to tourism, salt intrusion into mangroves and aquifers, increased frequency of windstorms and extreme rainfall, and impact on infrastructure throughout the Greater Banjul area. The west coast area has begun to see considerable degradation

of beach fronts and in many places beach widths have been reduced from 150 m to only 16 m, at a rate of recession of 1 to 2 m per year. Future rates of erosion are expected to accelerate further as sea level rises. Erosion has also affected the UNESCO site of Kunta Kinteh Island, endangering its integrity and outstanding universal value.



Picture 1 : Beach protection riprap at Kairaba Beach Hotel

2.4. Characteristics of the human environment

2.4.1. Population

According to World Bank Systematic Country Diagnostic report for The Gambia (May 2020)³², the population of The Gambia is estimated to be 2.1 million people. The 2013 Population and Housing Census indicated a sex ratio of 97 males to every 100 females³³. Regionally, the population of Kanifing is 382,096, 699,704 in WCR, 82,361, in NBR, 226,018 in CRR, and 239,916 in URR which are regions affected by the Tourism Project.

The Gambia has a youthful population, with 58% less than 24 years or within this age bracket.³⁴ Among those ages, 52.4 percent are female while 47.6 percent are male. This trend is likely to continue due to a high fertility rate (nearly 5.67 children per woman in 2015) and a declining mortality rate. This has implications on the social and economic environment.

The Gambia was the ninth most densely populated country in Africa in 2017, with 208 inhabitants per km². Even though The Gambia's fertility rate (birth per woman) is on a declining trend—from 5.8 in 2010 to 4.4 in 2020—the high annual population growth rate of 3.1 percent between 2000 and 2017 contributed to a doubling of the population between 1994 and 2017. Sustained high fertility has led to a large youth bulge. The youth age dependency ratio, defined as the number of young dependents (that is, population below the age of 15) relative to the working-age population, stands at 83.3 per 100 in 2018, the highest among SSA countries. The significance and pace of the youth population's

³² <http://hdl.handle.net/10986/33810>

³³ Gambia Bureau of Statistics (GBoS). 2013. The Gambia Population and Housing Census, Gender Report, Banjul, The Gambia: GBoS.

³⁴ Ibid.

growth—with the median age of the population standing at just under 20 years—poses challenges to the budgets for health, education, and social services. However, these demographic trends could yield a dividend if social and economic policies can ensure human capital accumulation for the young population (Canning et al. 2015).³⁵ Specific data on ethnic and religious composition was not obtained during consultations. However, nationally, ethnicity is composed of mainly eight officially recognized groups; Mandinka (36%), Fulani (22%), Wolof (15%), Jola (11%), Sarahuley (8%), Serer (2.5%), Manjago (1.7%), Aku (0.8%) and others 4% (GBoS, 2003). Approximately 95.7% of the population is Muslim, most of whom are Sunni. The Christian community makes up 4.2 percent of the population, the majority Roman Catholics. Religious groups that together constitute less than 1 percent of the population include Ahmadi Muslims, Baha'is, Hindus, and traditional African religion.³⁶

2.4.2. Basic social services

2.4.2.1. Access to health services

Despite the earlier achievements in the health sector which include high immunization coverage with the majority (83.2 percent) of children ages 12–23 months fully vaccinated with basic antigens, The Gambia continues to experience significant challenges in the sector resulting in the erosion of some of the achievements. Under-5 and neonatal mortality levels increasing since 2013. Under-5 mortality has slightly increased from 54 to 56 deaths per 1,000 live births. Infant mortality has increased from 34 to 42 deaths per 1,000 live births. Neonatal mortality has increased, from 22 to 29 deaths per 1,000 live births. Child mortality (deaths to children between ages 1 and 5) decreased slightly from 20 to 15 deaths per 1,000 live births.³⁷

In terms of the availability of health services, most Gambians have relatively high access to facilities, but types of facilities are unevenly distributed (GBoS 2017a). At national level approximately 88 percent of people report living within 30 minutes of a health facility, which represents a high level of accessibility. In the urban areas 74 percent of urban residents have access to health facilities as opposed to 33 per cent of rural residents. Affordability and time to travel to health facilities constitute major constraints.

The main constraints in the sector include low funding, high poverty levels resulting to the high prevalence of communicable and non-communicable diseases such as Malaria, Diarrhea, etc. Most of these diseases are easily preventable if appropriate environmental and lifestyle measures are taken, with more attention paid to development of health promotion and prevention actions than merely focusing on curative care alone. Other constraints include weak health information system; shortage of adequately and appropriately trained health staff; high attrition rate and lack of efficient and effective referral system.³⁸

³⁵ The Gambia Systematic Country Diagnostic (SCD). World Bank: Washington, DC, 2020. <https://openknowledge.worldbank.org/bitstream/handle/10986/33810/The-Gambia-Systematic-Country-Diagnostic.pdf?sequence=1&isAllowed=y>

³⁶ US Department of State, “2019 Report on International Religious Freedom: The Gambia” <https://www.state.gov/reports/2019-report-on-international-religious-freedom/the-gambia/#:~:text=Approximately%2095.7%20percent%20of%20the,%2C%20Hindus%2C%20and%20Eckankar%20members>

³⁷ The Gambia 2019-20 Demographic and Health Survey Summary Report Gambia Bureau of Statistics (GBoS) 2021

³⁸ National Health Policy- 2012 – 2020: Ministry of Health and Social Welfare.

2.4.2.2. Education

Access to education is lower in The Gambia than the SSA average across all levels of education and most categories, and access rates to primary education stagnated between 2010 and 2015³⁹. The gross enrollment ratio (GER) marginally decreased from 90 percent to 87 percent, compared to the SSA average of 102 percent. The rate of primary-school-age children who were out of school (7–12 years) increased from 27 percent to 30 percent. This represents about 100,000 out-of-school children, 95 percent of whom never went to school, and the remaining 5 percent dropped out of the system.

Access to secondary schooling is even lower, with a GER of 62 percent in the upper basic school (UBS) and 44 percent in the senior secondary school (SSS). The out-of-school rate for UBS is high at 30 percent, with 80 percent of the children having never attended school. The rate is even higher for SSS (43 percent). Access to the postsecondary school is 7 percent, lower than the SSA average of 10 percent. However, gender parity indices at the preschool, primary, and secondary levels have been met, though it falls short at the tertiary level.⁴⁰

There are disparities in terms of access to education in the different project affected areas. For example, in the more urbanized region of the West Coast Region access is higher than in the provinces (more rural) like URR, NBR, CRR. In addition, there are also gender disparities with girls with higher education attainment in urban areas than in rural areas.

2.4.3. Socio-economic baseline

2.4.3.1. Tourism and hotel industry⁴¹

The tourism sector is one of the main contributors to both GDP and employment. Estimates from the World Tourism and Travel Council (WTTC) suggest that tourism directly contributed about 8.5 percent to GDP, or US\$98 million, and 6.5 percent to employment in 2019. Tourism is also a major source of Foreign Direct Investment (FDI), having attracted over US\$45 million over the past 5 years.

The tourism sector grew significantly from 2010 until the COVID-19 pandemic in March 2020. The tourist arrivals went up from 91,000 in 2010 to 235,800 in 2019, growing faster than most other destinations in the region despite the 2012 Ebola epidemic, the 2017 political impasse and the 2019 collapse of Thomas Cook⁴² who was once one of the Major Tour Operators in the Gambia Tourism Industry and was key in bringing tourists to The Gambia. From 2017 to 2019-2020, the growth has been mostly driven by tourists from the Netherlands, UK, and the Gambian diaspora⁴³. But due to COVID-19, international arrivals experienced a 62 percent year-on-year decrease in 2020 accompanied by a US\$152 million decrease in tourism receipts (or 9 percent of GDP). This resulted on a reduction of both GDP contribution (-52.8 percent) and employment (-30.5 percent) for 2020.

Poor infrastructure and degradation of coastal resources, partly due to sea level rise and coastal erosion, as well as to poor planning and environmental practices by tourism businesses are hindering the existing attractions and hurt both the competitiveness and resilience of the industry. The manifestation of climate change in the coastal areas could exacerbate coastal erosion and increased risk of submerging beaches that are critical to tourism, salt intrusion into mangroves and aquifers,

³⁹ The Gambia Systematic Country Diagnostic (SCD). (2020) World Bank: Washington, DC.

⁴⁰ Ibid.

⁴¹ For more details, please read the PAD and the SCD (<https://openknowledge.worldbank.org/bitstream/handle/10986/33810/The-Gambia-Systematic-Country-Diagnostic.pdf?sequence=1&isAllowed=y>)

⁴² Government estimates for 2019 revealed that about 45 percent of all tourists, more than 94,000 tourists, arrived on a Thomas Cook flight.

⁴³ Project Appraisal Document, v. 14, March 2022.

increase the frequency of windstorms and extreme precipitation events, and impact infrastructure throughout the Greater Banjul Area. The West Coast area has begun to see considerable degradation of beachfronts and in many locations, beach widths have been reduced from 150m to just 16m, and at a retreat rate of 1m to 2m per year. Future erosion rates are projected to accelerate further with sea-level rise. Erosion has also impacted the UNESCO site of Kunta Kinteh Island, endangering its integrity and its Outstanding Universal Value.

2.4.3.2. Trade

Trade is an integral part of the socio-economic life of many Gambians, including rural people. Trade employs 10% of the population. The country's exports are modest and are mainly re-exports. These include timber, fishery products, cashew nuts and vegetable fats and oils. The main destinations for Gambia's re-exports in the region are Guinea, Mali, and Senegal. Petty trade is carried out by women in particular who sit along roadsides or in markets selling food, fruit, fish, etc., and other small-scale items.

2.4.3.3. Agriculture

Agriculture remains a mainstay of the economy as a provider of employment, income, and livelihoods. Agricultural production is highly dependent on rainfall, which has been erratic in recent years. Agriculture generates about 25 percent of GDP and employs 40.3 percent of the workforce. Moreover, the top four agriculture products by export value (groundnuts, groundnut oil, cashew nuts, and fisheries products) accounted for almost 80 percent of domestically exported products in both 2010 and 2015. Agriculture production is relatively undiversified and largely subsistence oriented, with 62 percent of farm households growing crops only for subsistence. Agriculture accounts for 23% of The Gambia's GDP and provides employment and income to more than 75% of the working population. It is mainly groundnut and subsistence agriculture based on cereal crops. In terms of land use, more than one-third of the Gambia's arable land is devoted to millet, with another third occupied by groundnuts. The other major crops are sorghum, maize, and rice (dry, irrigated, and flooded). In addition to groundnuts, sesame is an export crop. Fruits and vegetables are also exported to Senegal.

2.4.3.4. Livestock

The livestock sector plays an important role in creating livelihoods opportunities and income in The Gambia, comprising about 8% of its GDP. Livestock herding play a role in both income generation and savings for rural inhabitants. The Gambia relies predominately on traditional breeds of cattle for beef and milk production as well as small ruminants, both produced through extensive, free-range systems.

Local production is currently insufficient to meet demand, with production constrained by the low productivity of traditional breeds, poor feeding resources, limited processing infrastructure, limited capacity of and access to veterinary resources and a lack of coordinated value chains

2.4.3.5. Fishing

Fisheries contributed 4.6 percent of GDP, on average, during 2013–17. However, the sector's contribution could be underestimated given the informal nature of artisanal fishing and artisanal processing activities. Exports of fish and crustaceans are a source of export revenues, accounting for 10.7 percent of merchandise exports (excluding reexports). In practice, the fisheries sector contributes very little revenues to the government, partly attributed to foreign industrial vessels landing in foreign ports due to the unavailability of appropriate landing and port facilities and ancillary facilities in The Gambia. The main constraints to the development of fishing are the lack of infrastructure, the lack of basic equipment, and the lack of capacity at both the institutional and private sector levels.

Another concern is related to groundwater, the country's only source of drinking water (the Gambia River being too saline to exploit).⁴⁴ While the Department of Water Resources is responsible for groundwater monitoring and management, it has limited capacity and in effect there is relatively little knowledge about the full extent of Gambia's resources. Due to irregular water supply, many households are drilling wells but there is little control of this activity and there are growing concerns about the impact of groundwater quality and the sustainability of the resources.

2.5. Land tenure in the Gambia

The Ministry for Lands, Regional Governments and Religious Affairs is the main government agency responsible for the land administration in The Gambia with its two key technical departments: the Department of Lands and Surveys, and the Department of Physical Planning and Housing. The former is responsible for the survey, mapping and demarcation of national and international boundaries and government layouts, whereas the latter is responsible for ensuring the rational and equitable utilization of the available land resources.

The main acts relating to land administration are:

- The Constitution of the Second Republic of The Gambia, *adopted on 8 August 1996, entered into force in January 1997, last amended in 200*
- the Lands (Regions) Act 1991, which covers land in the provinces
- the State Lands Act 1991, which covers Banjul, the entire Kombo St. Mary as well the Districts of Kombo North, South and Central in the West Coast Region
- the Physical Planning and Control Act 1991
- the Surveys Act 1991
- Local Government Act, 2002
- The Survey Act, 1991
- Land Use Regulations, 1995
- Lands Commission Act, 2007
- State Lands Regulations, 1995
- Development Control Regulations, 1995
- Development Control Regulations, 1995

Land tenure in the Gambia (i.e., both the provinces and the state land areas) fall under four main categories:

- Customary or traditional tenure** is an interest or title, which a member of the larger community acquires in the communal land. It is an interest, which is held as of right by virtue of being a member of the community. The member who holds such interest has the right of beneficial occupation, unfettered use (subject to the laws of the country). Upon death, the interest devolves on his/her successors in title ad infinitum. This form of tenure is mostly prevalent in the provinces.
- State owned lands are public lands**, specifically acquired by the government under an appropriate enactment using the state powers of eminent domain. Currently the relevant legal instrument is the State Lands Act of 1991, which provides for the compulsory acquisition for public purposes or in the public interest. Under such ownership, the rights become vested in the government, which can then proceed to dispose of the lands by way of leases, certificate of allocations etc. to the relevant beneficiary state institutions as well as private individuals and organizations.

⁴⁴ According to the ⁴⁴Global Water Partnership (2009).

- iii. **Leasehold tenure** involves the execution of a lease between individual(s) and the Government/ District Authority for a period of 21 years for Provincial lands and 99 years in the state lands area. The grantor may impose various terms and conditions including the payment of rent as consideration for the grant.
- iv. **Free hold tenure** is the highest form of ownership with no term limits, and it is only created by express grant from the Government. It is a rare form of tenure that confers absolute ownership of the land, and it exists mainly in Banjul and the immediate suburbs.

The Land Tenure System in The Gambia is complex and sensitive. The typical tenure system is communal in most communities; however, this kind of ownership can result in land fragmentation which does not support large-scale investment in production.

The land tenure system in The Gambia is generally based on a dual system due principally to the colonial past, which introduced the statutory title in addition to customary tenure.⁴⁵

The State system governs the freehold and leasehold titles introduced by the British and are based on English law. Freehold and leasehold are most prevalent in the Banjul and Kombo St. Mary Region, while customary tenure is most common in the provinces. The different statutory instruments regulating statutory land ownership are the State Lands Act ,1991 and the Lands (Regions) Act, 1991.

The State Land Act grants leases up to 99 years in areas where the statute is applicable (Greater Banjul Area). On the other hand, the Lands (Region Act) provides for the proper upkeep of lands in the regions for public goods and accords the Minister Powers to designate lands in any part of the provinces as state lands.

The customary land tenure system, on the other hand, is based purely on the traditional system of ownership, which is entirely dictated by the customs and traditions of the people. According to customary laws, where an original piece of land is cleared by a Kabilo (a collection of families) the ownership of land is vested in the head of the Kabilo. This is the basis of the customary land tenure system, which has evolved. Customary land tenure exists mainly in rural areas. The women are particularly discriminated against by the customary laws, which is male-dominated, and this is common in the entire rural Gambia.

Land has been recognized as the second most common source of conflict and instability in the Gambia. Land conflicts are a key driver of fragility, and poor land governance drives land conflicts (2021 Risk and Resilience Assessment, RRA).

- **Gender-Unequal Inheritance Rights:** The Constitution recognizes women’s inheritance rights as granted under personal law, and it specifically recognizes customary practices as an exception to its definition of discrimination (LGAF 2013). Since females can only inherit 50 percent of the portion of a male’s share of the estate under Shariah law, and more than 90 percent of the population is Muslim, women’s inheritance rights are legally unequal to men’s rights for the vast majority of the population. The continued practice of polygamous marriage further reduces women’s inheritance claims under Shariah law: in the case of a man with four wives (permitted under Shariah law), each wife could receive just 12 percent of his land.

⁴⁵ “Improving Land Sector Governance in The Gambia: Implementation of the Land Governance Assessment Framework (LGAF)” (Aug. 2013) <https://openknowledge.worldbank.org/bitstream/handle/10986/28522/119603-WP-P095390-PUBLIC-7-9-2017-9-52-5-GambiaFinalReport.pdf?sequence=1&isAllowed=y>

Moreover, customary law and practice also discriminate against women, including in urban areas; by custom, women only inherit customary land that they own individually, which is rare in practice. Women's unequal inheritance rights restrict their access to land, especially in rural areas, where land rights are often transferred through inheritance rather than land markets.

In terms of women and land ownership, generally, cultural norms and customs have marginalized women in decision-making and limited their access to land ownership largely due land use and tenure rights, which favor men since important decisions relating to land including inheritance and ownership are made by the men. Furthermore, according to sharia law, which is applicable to inheritance among Muslim families (which are overwhelmingly predominant in the project intervention area), the female heirs receive only half (50%) of the inherited assets compared to their male siblings.

Barriers exist for women in accessing land under customary title/ traditional arrangement. Women's rights on land, as they relate to customary tenure, are restrictive. Whilst this does not pose any problems in State Lands (where land is owned by and administered directly by the State), it is a major obstacle with respect to customary land. The Constitution recognizes customary practices as an important basis for customary Tenure thereby posing an obstacle to the legal equality of women and thus reinforcing customary practices that deny women ownership and control over land.

In the project area, the land tenure is a mix with traditional/ customary tenure existing side by side with leaseholds. However, the majority of the holdings are customary with the certificate of occupancy issued by the Alkali.

2.6. Inequality in the labor force

Women have unequal access to formal employment and income generating opportunities in The Gambia, as well as unequal access to credit and financing to build a small business, and unequal access for training and labor skills development (see Annex 3).

Labor force participation in the country among women is low and reduces the growth potential of the economy. In urban labor markets, female participation is only 37 percent compared to 70 percent for men (SCD, May 2020).

2.7 Gender Based Violence

Acceptability of violence against women and girls remains high, with 55 percent of women justifying intimate partner violence in some circumstances. Harmful social and gender norms, beliefs and behaviors contribute to sustained discrimination of women and girls, and ultimately to a high prevalence of GBV, with 46% of women aged 15-49 having experienced physical violence at least once in their lifetime and 41 percent having experiences intimate partner violence (IPV). Additionally, social norms limit women's access to opportunities and decision making, with less than a third of married women participating in the decision-making either alone or jointly with their partner, regarding their own health care, major household expenses or social interactions (DHS, 2019-20).

2.8. Key environmental and social issues related to the project

From the situational analysis of the biophysical and socio-economic profile of the project intervention zone, several environmental and social issues of varying degrees of sensitivity were identified. They are summarized in the table below.

Table 8: Sensitivity of environmental and social issues

| Issues | | Description |
|---------------|--|--|
| Environmental | Coastal erosion | The Gambia, by virtue of its geography, is very vulnerable to natural hazards related to climate variability and change, particularly in relation to erosion. The coastal zone is eroding rapidly, and this is reflected in a very marked retreat in the width of the beaches. The issue related to the degradation of hotel infrastructures is major for the Project and measures must be put in place to fight against erosion and to protect certain parts of the coastline and socio-economic establishments located along the coast. |
| | Degradation of historical and tourist sites | The historical and touristic heritage of The Gambia (Kunta Kinteh island, Museum of slavery, Juffureh Rest House, San Domingo Reserve), is exposed to an already very advanced degradation. It consists of the decrepitude of the historical sites linked to a deficit of conservation and an insufficiency of the means of protection. The risk of seeing the historical sites fall into ruin and disappear is more and more certain. |
| | Degradation of natural forest and wildlife conservation areas | The protected nature reserves are of regional importance for the sustainability of ecotourism in The Gambia. They constitute a real tourist attraction for the country, but increasingly these spaces are strongly threatened. The gathering of forest fruits (<i>Saba senegalensis</i>) by local residents, the dumping of household waste in these areas (Abuko reserve), the aggression of the surroundings (development of playgrounds near the Abuko reserve) constitutes an issue to be considered for the viability and sustainability of parks and reserves. Civil works will most likely have some factual impacts on the existing and surrounding biodiversity ecosystem, the lack of clear details on both the technical designs of the infrastructure as well as the physical location of these infrastructure to be supported by the project recommend making provision for the preparation of a comprehensive Biodiversity Management Plan (BMP) that is considerate enough of riparian communities and the existing wildlife needs and constraints. |
| | Odor nuisance | At certain times of the year, the dumping of overfished fish, and other seafood on the beach due to the lack of conservation infrastructure creates a nuisance at the beach. The rotting of these fish causes stench that is a clear nuisance for tourists and residents. |
| Social | Social climate / Participation and involvement of the population | The challenge is to strengthen community involvement and mitigate exclusion by promoting equitable access to the benefits and opportunities to small grants and supporting local businesses, especially women-led businesses. In addition, civil works require proper monitoring to ensure that there is no forced or child labor. |
| | Vulnerable Population Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) and violence against children | The work and the influx of labor (around 100-150 workers) present a substantial risk of harassment and other forms of violence to sex workers, but also to local communities in the form of risks of sexual harassment (SH), sexual exploitation and abuse (SEA). The risks of sexual exploitation and abuse (SEA) of women and children and the risk of child labor are also to be considered. The implementation of the action plan to mitigate SEA/SH and child labor should help manage this risk. Women employed or owning the MSME that will be supported by this project face SEA/SH during the recruitment process for those activates, during trainings that will be offered but also while they are working in tourism related sectors. Women employed in tourism sector face risks of SEA/SH by the supervisor and colleges, as well as the clients. Women MSME owners that will be supported by the project also face risks of violence at home and in community linked to the changes of their economic and social status. |
| | Private assets and livelihoods of vulnerable populations | The projected work of coastal protection and rehabilitation of some historical monuments could cause disruption of socio-economic activities and loss of income due to restriction of access due to the work; discomfort related to the noise of the machines |

| Issues | Description |
|--------|--|
| | <p>and decrease in tourist arrivals⁴⁶, loss of private property, limited access⁴⁷ to some parts of the beach, mostly for safety and security reasons, etc. Resettlement Action Plans will be developed to address economical and/or physical displacement impacts.</p> <p>As of now, there is no need for a Process Framework (PF) since it is not foreseen that there will be restricted access to common property. This will be assessed during implementation once activities and sites are known.</p> |

⁴⁶ During coastal protection works, it is possible that there will be discomforts during the execution phase. The visits to hotels located near the work sites could drop. In addition, pollution risks related to the spillage of hydrocarbons following an accident are also possible.

⁴⁷ Overall, this concerns solely the socio-economic activities such as small businesses on the beaches, bathing activities, etc., but this limitation is very temporary and does not halt the continuity of activities.

3. POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

The objective of this chapter is to describe the generic effects likely to be induced by the project activities (investments/subprojects) on the environmental and social components of the project intervention area. The aim is to highlight the environmental and social benefits, risks and impacts that could result from the implementation of the planned activities. These effects are analyzed according to the different phases of the project's development, namely: the planning phase, the construction phase, and the operation phase. However, at the current stage of project formulation, it is not possible to identify and evaluate precisely all the impacts likely to be generated by the project. Thus, site specific socio-environmental assessments (Environmental and Social Impact Assessment (ESIA) more refined on the sub-projects will allow to better identify the impacts related to the project.

3.1. Potential positive environmental and social impacts

3.1.1 Overall potential positive impacts of the project

3.1.2 The Gambia Tourism Project will comprehensively improve the attractiveness of tourist sites and promote economic development, and at the same time promote a coastal climate resilience approach. Specific positive impacts of project components

The specific positive impacts for each component are presented in the table below.

Table 9: Positive impacts of project components

| Components | Sub-Components | Positive Impacts |
|--|---|--|
| Component 1: Policy Framework and MSME participation | 1A- Improved institutional capacity for data-driven planning, marketing, and branding | <ul style="list-style-type: none"> Facilitation of technology transfer in the field of tourism Improvement in engaging various stakeholders in the sector |
| | 1B- Increase participation of MSME within the selected destinations | <ul style="list-style-type: none"> Additional support/grants for tourism organizations Strengthening the circular economy of tourism Improving the employability of youth and women in tourism Job creation for local population and reduction of unemployment Improvement of tourism products to attract more tourists and increase national/local economies |
| Component 2: Infrastructure Support for the Diversification and Resilience of the Tourism Sector | 2A: Protection, rehabilitation, and integrated management of coastal areas | <ul style="list-style-type: none"> Reduction of coastal erosion - important to tourist sector, local economy and natural capital Rehabilitation of cultural sites like Kunta Kinteh island that will diversify tourism product and attract more foreigners to visit The Gambia |

| Components | Sub-Components | Positive Impacts |
|--|--|--|
| | 2B: Integrated Tourism Product Development and Diversification of selected TDA/tourism areas | <ul style="list-style-type: none"> Competitiveness of the Gambian destination and in the sub-region Direct employment of locals as drivers, engineers, and other unskilled jobs including access to employment for women in the sector |
| Component 3: Project Management, Monitoring and Evaluation | | <ul style="list-style-type: none"> Promote good management practices and develop competence in tourism sector statistics |
| Component 4: Contingency Emergency Response Component | | <ul style="list-style-type: none"> Reducing vulnerability to crisis situations by employing access to capital to areas of urgent need |

Policy Framework and MSME participation (sub-components 1.1 & 1.2)

The intended project will reduce the fragility of the tourism industry with the implementation of activities more resilient to external shocks. The direct impact of the project will be the improvement of tourism offer to attract more visitors and improve the GDP. New employment will be offered to Gambians.

Infrastructure Support for the Diversification and Resilience of the Tourism Sector (sub-component: 2.1; 2.2)

The implementation of the project will result in the direct employment of locals as drivers, engineers, and other unskilled jobs, around 150 opportunities will be created. Women from the local communities will sell food and provide other services for the work force at various sites. As in the case of most infrastructure projects, women and men engaged in trading activities in the communities within the project zone will experience increase in their daily sales.

The improvement of rehabilitation of cultural sites like Kunta Kinteh island will diversify tourism offer and attract more foreigners visiting The Gambia. Also, Gambians in the Diaspora will be willing to visit those cultural and historical sites with their families.

3.2 Potential negative generic environmental and social impacts

The negative impacts of the project will arise mainly from the activities of the following sub-components:

- Activities to be funded under component 1B through the Matching Grant Scheme
- Protection, Rehabilitation, and Integrated Management of Coastal Areas Sub-component
- Enhanced destination development and erosion protection of Kunta Kinteh Island and other selected tourist destinations: Sub-component
- Construction/rehabilitation of access roads to tourist destinations Sub-component
- Activities from CERC component

3.2.1 Potential negative environmental impacts

In the implementation of the project, the sites and their immediate surroundings are likely to be affected. Project activities (See Table 9 for potential impacts according to sub-projects) considered to be funded under the relevant sub-components (Protection, rehabilitation, and integrated management of coastal areas, Integrated Tourism Product Development and Diversification of selected TDA/tourism areas) are therefore related to: the selection of sites, particularly the potential expropriation procedure involved in the selection of the right-of-way for new coastal protection

infrastructures and their development, and the execution of new civil works or the rehabilitation of existing tourism-related infrastructures. Elements of the biophysical environment that will be affected by the impacts of the subprojects include soil, vegetation, water, and air, while components of the human environment that may be affected by the project include land, human health, local employment and income, social peace, and cultural resources.

3.2.1.1 Degradation of forest resources

Depending on the sites identified for the construction base camp, construction and rehabilitation roads, losses of natural habitats may be induced by the civil works site preparation. Also, the work to build the trails/pathways in the reserves and parks will potentially lead to the clearing of the vegetation cover on the right-of-way of the routes. The clearing of the trails could result in disturbance of wildlife, such as nesting birds and/or amphibians. The work will also lead to restriction of access by communities using forest resources for their livelihoods.

3.2.1.2 Wildlife disturbance

The targeted reserve sites are rich in wildlife. Noise from the operation of the construction equipment will generally disturb the quietude of these fragile wildlife resources. The removal of trees and shrubs to clear the right-of-way could certainly lead to a loss of natural habitats for the wildlife present in the vicinity, including very fragile animals such as termites, red bitterns, snails, mostly during their hibernation after the rainy season, etc. Furthermore, with the noise around, part of which might scare the surrounding wildlife, it is certain that during the construction period, wildlife will move within the reserves in search of rather quieter and safer sites. There is a real risk of loss of small wildlife in the vicinity of the corridor (due to collisions with vehicles): newly borne animals, small rodents, hedgehogs, and other insects, amphibians. Aquatic fauna will also be disturbed during the construction of the coastal hydraulic protection works, as well as the jetty landing park, and the rehabilitation of cultural historical sites such as the Kunta Kinteh island, etc.

3.2.1.3 Soil pollution

During the construction phase, in the event of an accidental spill or following an accidental spill during the refueling of a machine or truck, polluting elements (hydrocarbons) could accidentally reach the ground. In the same way, the temporary construction site installations with the presence of large machines and trucks can also cause negative effects on the soil, in terms of spill of such effluents (gas, oil, grease, etc.) compaction and destruction of its structure with repeated passages, but also of contamination by the discharges or draining of oils outside of the impermeable zones specially fitted out for this purpose.

3.2.1.4 Pollution of water resources

The trail construction work in the reserves does not have significant impacts in terms of stream disturbance since it will not result in any change in the hydrological regime. However, inadequate management of runoff pathways would pose a major risk to the trail structure. Indeed, the corridor could constitute an obstacle to the natural flow of water and generate temporary stagnant water zones in the reserves. Therefore, depending on the topography, the planned developments will have to promote the natural drainage of rainwater. Moreover, poor waste management of certain substance on construction site could likely end up being drained by rainwaters into the open rivers/watercourses, henceforth increasing the pollution of these resources; and or villagers (unsafe usage of poorly disposed containers, villagers could use to fetch water, causing diarrheas, waterborne disease, etc.).

There is also a risk of accidental pollution due to leaks of hydrocarbons, grease, or hydraulic fluids from the construction equipment during the coastal protection work, which could also lead to a brushfire that could further endanger the existing wildlife as well as the livelihoods of Park/Reserve workers and the riparian communities

3.2.1.5 Air pollution

Air quality is likely to be degraded by dust and exhaust fumes during the construction phase. These impacts can occur either in the form of dust emissions or in the form of gaseous emissions induced by the construction equipment and machinery. Dust emissions can be the cause of lung infections for site personnel, but also for people living in the vicinity of the work zones and therefore require measures to mitigate the impact.

3.2.1.6 Fire Risks

Potential sources of fire will include off-site and on-site sources. Off-site sources include bush fire from herdsmen activities, hunting, slash and burn and embers from cigarette stubs and cooking in adjoining farms. On-site sources include smoking by workers, faulty electrical gadgets, and the use of sub-standard electrical cables.

The main sources of fire risks during project implementation would be herdsmen activities grazing their cattle on lands close to the developed infrastructure, especially, during the dry season, to regenerate grass to feed their cattle. Other causes of off-site fire could be hunting with fire, slash and burn farming practices and embers from cooking activities in farm and stubs of cigarettes.

Fire from off-site sources could spread to adjoining project site and destroy facilities developed. Workers could also suffer severe burns and possibly die when trapped by fire in the facilities.

Faulty electrical gadgets, poor electrical wiring, or the use of sub-standard electrical cables for the infrastructure developed, although very unlikely, could be the main sources of on-site fire risk. Workers would be the main recipient of any such fire outbreak aside from the destruction of property. Farms and other structures developed on adjoining land could also be destroyed.

3.2.1.7 Noise and vibration

The repeated passage of construction machines/trucks and the operation of construction equipment (generators), as well as the protection of coastal areas, will induce noise emissions (noise and vibrations) that are often inconvenient for the workers, animals and the people living near the work areas (both within and outside the park/reserve or project intervention areas).

3.3 Potential negative social impacts

The potential negative social impacts associated with the project include: the disruption of the living environment, the probable acquisition of land for infrastructure development, the establishment of base camps on private land, the probable destruction of crops, the risk of disruption of cultural remains during excavations. Other risks include accidents, occupational, health and safety issues, disturbances of social cohesion within the affected communities and exposure to risks such as HIV/ AIDS, STI, SEA/SH with the arrival of the labor influx. Prioritizing women on work sites, and during the implementation of other project activities such as matching grant schemes may expose women and children to opportunistic or exploitative relationships.

3.3.1 Risks related to the health and safety of workers and neighboring populations

The movement of trucks and machinery between the construction site and the technical base is a source of accidents and greatly exposes the local population to these installations. Dust and fumes can cause various nuisances and respiratory illnesses in workers and people living near the work sites. Also, there are risks of STI/HIV/AIDS transmission related to the presence of a temporary foreign workforce or coming outside the affected communities, generally composed of isolated young men, who tend to increase contact with young girls and women among the local population in the work zones. This will increase the risk of Sexual Exploitation and Abuse, Sexual Harassment, or conflict between members of the community and the workforce which may affect project implementation. These risks can be avoided or reduced by implementing an awareness campaign for workers and local populations and

enforcing and educating workers on the Code of Conducts, as well as (sub the local population about the Grievance Mechanism (including the SEA/SH-GM process) and community sensitization on GBV.

Also, failure to observe barrier measures could be a source of spread of the COVID-19 pandemic in the surrounding work sites and settlements.

3.3.2 Vehicular Accidents and workers knockdowns

There is a risk of haulage trucks and other construction vehicles colliding with one another or knocking down unsuspecting workers, wildlife or domestic animals or existing structures on site. Some of the drivers of these vehicles could be over-speeding on the project site, reversing without looking out for other vehicles and workers in their way or notifying them, or could be intoxicated. Accidents and knockdowns on the project site could also be due to mechanical faults that are out of control of the driver as a result of a poor maintenance regime. Such accidents may lead to injuries and the loss of lives of workers and the public.

3.3.3 Disruption of income sources for formal and informal activities

During the execution of the coastal protection works, there will be a disruption of the activities of hoteliers, tourist guides, shopkeepers/taxi drivers, craftsmen installed on the beach, etc. Their activities will be stopped or reduced, which will result in the temporary loss of employment and income.

The drop in tourist arrivals during construction period will result in a loss of revenue for hoteliers, managers of nature reserves, various operators in the sector and, in short, the Gambian State.

3.3.4 impacts on cultural heritage

Facilities to be renovated or the new ones to be built to attract more tourists could be sited at or close to locations of sacred groves and archaeological resources, which could lead to their destruction. The associated infrastructure development could involve land clearing and some level of excavation which when done without proper care and thought, could also lead to damage to potential archaeological and historical resources and cultural heritage. Archaeological discoveries which could have been preserved and served as historical artifacts to trace the histories and heritage of the local people may be lost. The development of a Cultural Historical Management Plan (CHMP) prior to the start of work.

Construction workers from outside the project communities during subproject development may not be aware of some customs and traditions of the local community and may potentially break them. This could offend the sensibilities of the inhabitants of the project communities and could lead to a potential conflict between residents and workers. The situation could result in community agitations and further result in the delay of the project implementation schedule.

3.3.5 Pollution and nuisance in the living environment

The proposed civil works will generate waste that may spread and affect the health of the sites. The anarchic discharge of solid and liquid waste from the construction site (excavated material, various residues, wastewater, etc.) could degrade the immediate living environment of the selected project sites, as these discharge points could be transformed into unauthorized dumpsites by the population.

3.3.6 Social frustration when local labor is not hired

Failure to use equally skilled or unskilled resident labors on the job could lead to some frustration (and even conflict at the local level). Local recruitment of unskilled laborers should be encouraged. This would not only provide jobs for unemployed youth, but more importantly, would ensure local ownership of and foster more social accountability for the project. The frustration of not employing "locals" can lead to vandalism during and after work. On the other hand, their recruitment can be a

reason for security, guarantee, preservation, creation of other local opportunities and protection of the infrastructure.

During the infrastructure construction phase, the influx of foreign labor poses a risk to vulnerable people in terms of sexual abuse of underage girls and impoverished widows. This may exacerbate the social frustration in the affected communities.

The use of replacement labor (i.e., labor that isn't cleared to be used – i.e., a local community member can't go to work so they ask another person to fill in. This is prohibited, including the use of children labor) must also be supervised to avoid exploitation of local labor and forced labor. In addition, contractors need to enforce the project LMP with their subcontractors to ensure code of conduct (CoC) are signed and socialized, pay is fair/regularly paid, access to a worker GM, etc. The project will also have to eradicate all forms of child labor and related abuses in the implementation of the project.

3.3.7 Disruption of customs and traditions

The behavior of foreign workers can lead to difficulties of integration and acceptance if they do not respect the habits and customs of the host populations.

3.3.8 Risks of social conflicts in case of occupation of public or private land

The identification of sites for land take needs may result in temporary loss of land and other economic assets and restrict access to public lands/common use natural resources that will adversely affect livelihoods. These losses could require a land acquisition procedure by the project which could be adversely affected leading to livelihood disruption and economic loss to crops and possibly property. Where such affected persons are women or belong to a vulnerable group the severity of impact could be disproportionately high, since they may not have any other alternative livelihood source. They may also have no rights to own and use land like the case of women in certain cultural backgrounds. Development of the above projects could also deny locals access to their sources of livelihoods, impeding ease of mobility.

This procedure may generate tensions if it is not done according to the rules set by the Project regarding resettlement. Also, compensation payment to PAPs for loss of livelihood/asset as well as restricting access to Protected Areas and communal areas could make some people more vulnerable (e.g., disabled, or elderly persons) to social and family pressures that would reduce their ability to use the funds. Without proper monitoring, heads of households could mismanage the funds and leave their family in difficulty. Moreover, some heads of households could be more vulnerable (e.g.: elderly person living alone) and may be subject to pressure from others regarding compensation received.

3.3.9 Sexual exploitation and abuse/Sexual Harassment

During the infrastructure construction phase, the influx of foreign labor poses a risk to vulnerable people in terms of sexual abuse, exploitation and harassment of underage girls and impoverished widows. A risk due to labor influx but also due to other project activities. Harassment of women who work in hotels/restaurants and these establishments could be receiving matching grants. The same risks exist for businesswomen who are seeking matching grants – there could be opportunistic and exploitative demands for transactional sex. Similarly, the recruitment and presence of workers on construction sites could lead to unwanted sexual advances, requests for sexual favors, and other verbal or physical behavior of a sexual nature against securing a work contract. The capacity building and grant matching activities of component 1 and the intention to prioritize women can bear negative impacts for those participating; risks of SEA/SH during the recruitment and capacity building, SEA/SH from supervisors, colleagues and the clients while working in tourism related sector. The women may also experience increased violence at home and/or in communities due to the changes of their financial and social status resulting from the support and opportunities offered by the project.

3.3.10 Physical aggression and moral harassment

The construction phase may lead to an increase in acts of physical violence among construction site personnel. Examples: hitting, slapping, choking, shoving, etc. The same applies to moral harassment, which may take the form of insults, reprimands, bullying, lack of respect and courtesy, etc.

3.3.11 Occupational Health and Safety

The potential occupational and public health and safety risks because of the implementation of the project will include, but not limited to the following:

1. Dust and emissions from land preparation (clearing and levelling of the land, excavation works, stockpiling of excavated material, etc.), equipment and machinery use and cement, paint, and solvents exposure
2. Noise and vibration from heavy-duty equipment and machinery use
3. Risk of drowning from open canals
4. Health risk from chemical handling; and
5. Risk of accidents and knockdowns from the movement of trucks/vehicles and other machinery.
6. Accidents Trips, slips, falls
7. Risk of manual handling and work-related musculoskeletal disorders etc.
8. Road safety during material transportation or form inappropriate community awareness

3.3.12 Risk of Contracting and Spreading COVID-19

COVID-19 is a contagious communicable disease that could readily spread to project workers and affected communities during the implementation. Especially in rural areas where access to health care services is limited, this risk could disproportionately impact vulnerable people such as those with underlying illness and the elderly.

3.3.13 Labor and Gender issues

The potential labor and gender issues that could be associated with the implementation of the project will include:

1. Risk of child abuse (i.e., vicinity of workers camps or site-works, neighboring communities, etc.)
2. Risk of sexual exploitation, abuse, and sexual harassment by workers (i.e., worker-to-workers, most vulnerable once being the weakest to exploit, etc.)
3. Women being side-tracked from the compensation and decision-making processes (discrimination, social exclusion, etc.)
4. Disturbance of women's subsistence activities (change in daily activities, from usual women-centered job/daily occupation to a shared job environment with male co-workers, etc.)
5. Marginalization of women during the employment (discrimination, salary inequality, etc.); and Marginalization of vulnerable groups (refusal to hire disables, people living with a disability, elderly people, foreigners, prisoners/in conflict with the law, etc.).

3.3.14 Risk of use of child labor

During the construction phase of the project, there is a risk that child labor will develop in a context where the impact of poverty could cause it.

Table 10. Generic risks and adverse environmental impacts of the Project

| | Potential risks and negative impacts | |
|-------------------------------|---|--|
| | Preparation / Construction Phase | Operation phase |
| Biophysical components | | |
| Air | Dust pollution from the work Exhaust emissions from construction equipment Air quality degradation Irritations in humans, respiratory and skin diseases | No control of the urban traffic which has become more intense |
| Vegetation and fauna | Loss of some trees due, among other things, to the expansion of the runways; Wildlife Disturbance | Untimely visits to nature reserves Wildlife disturbance Risk of collision or crushing of small wildlife by vehicles Risk of disease transmission between humans and animals (case of chimpanzees in the River Gambia National Park) |
| Soil | Degradation of quality by unintentional spillage of oils and fuels Soil Erosion Risk | Soil pollution due to uncontrolled discharge of wastewater from tourists establishments and related activities (restaurants, shops, cab ranks, etc. |
| Water | Pollution of water resources especially during coastal protection works | Discharge of untreated wastewater from human settlements and hotels |
| Sound environment | Noise pollution due to the noise and vibrations of the machines Discomfort related to the degradation of the sound environment | Wildlife disturbance from visiting vehicle engine noise |
| Human components | | |
| Land | Risk of infringement on private property Risks of social discontent in case of occupation of public or private land | Land speculation due to developments |
| Health and Safety | Risks of accidents related to the work for the local population and site personnel Increased risk of contamination by infectious diseases Child labor risks on construction sites | Risk of traffic accidents on developed trails Increased risk of contamination by infectious diseases |

| | Potential risks and negative impacts | |
|--------------------------------------|--|---|
| | Preparation / Construction Phase | Operation phase |
| Living environment | Risks of inconvenience related to the rotation of machines and construction vehicles Disturbance of the usual quietness of the populations and the tourists Degradation of the living environment by the discharge of waste from the works | Increased tourist rate and inability to handle the influx |
| Socio-economic activities | Risk of disruption to business Exclusion risks to vulnerable beneficiaries (i.e., the matching grant schemes for example) | Failure to respect the project's commitments to local communities |
| Social cohesion | Disruption of socio-economic activities on the work sites; Reinforcement of the feeling of social exclusion linked to the non-involvement of the population Frustrations/social conflicts linked to the non-management or mismanagement of the grievances of the local population Non-utilization of local labor | Degradation of the morals of the local population |
| Gender-based violence | Risk of sexual exploitation and abuse of vulnerable communities: children, youth without activities, people living with disabilities, poor women etc. Risks of SEA/SH of women working in the tourism sector (including MSME owners) during recruitment, trainings, participation in project activities. | <ul style="list-style-type: none"> - Exacerbation of sex tourism/prostitution of young women and children - SEA/SH of women involved in tourism sector activities - GBV increase at home and communities to women MSME owners that received support and opportunities they previously didn't have and changed their financial and social status. |
| Natural and cultural heritage | Risk of degradation of historical and tourist sites Risk of destruction of archaeological sites/historical remains | Poor management/conservation of sites rehabilitated by the project |

4 Negative impacts of climate change on tourism

The Gambia is vulnerable to the impacts of climate change from increase in temperature, decrease in rainfall, and sea level rise. These affect the country's key economic sector, such as the agriculture sector, which is dominated by extensive rain-fed agriculture, as well as the tourism sector, where the effects of climate change are reflected in the shrinking of estuaries. Indeed, tourism is an activity that is very dependent on geo-climatic conditions. Changes in temperature and precipitation patterns can have effects on environmental conditions that may dissuade tourists from undertaking a trip. It can also have physical consequences on tourism infrastructure and subsequent social, economic, and political impacts. Coastal erosion and the loss or submergence of beaches may hinder the Gambian destination, mainly for winter beach tourism. The landscape setting is obviously important for ecotourism. Plant species can be affected by water stress. The vegetation and nature reserves that receive many visitors can then be expected to change significantly and possibly chaotically. The erosion of these parks (Abuko Park, and River Gambia National Park) is expected to result in a loss of resources from visitor revenues.

In general, the negative impacts of climate change are:

- Coastal erosion and damage to hotel infrastructure
- Increased health vulnerability and restrictions on tourist mobility
- Decrease in attractiveness and number of arrivals
- Change in the length of stay
- Economic loss to the country
- loss of employment and increased unemployment.

3.4 Mitigation measures for potential risks and impacts

Depending on the results of the selection and classification of the sub-projects, some of the project's activities could be subject to an Environmental and Social Impact Assessment (ESIA) or Environmental and Social Management Plan (ESMP) before any startup or a Resettlement Action Plan (RAP) in case of involuntary displacement (displacement of people, loss of property, loss of sources of income, etc.). These environmental and social studies will determine more precisely the nature of the measures to be applied for each sub-component of the sub-project. In case such studies are not necessary, simple environmental and social measures, to be carried out both during the construction phase and during the operation period, can be applied according to the measures below. The table below includes a list of mitigation measures for the negative impacts identified above.

Table 11. Measures to mitigate negative impacts

| Sensitive components | Risks/Impacts | Management actions/approach |
|----------------------|---|--|
| Air quality | <ul style="list-style-type: none"> - Degradation of air quality due to site clearing and construction. - Nuisances such as flies, odors, dust, and noise. | <p>During the construction phase</p> <ul style="list-style-type: none"> - Contractors should be instructed in their contracts to reduce air pollution by using well-maintained equipment - Comply with current technical standards for the use of heavy equipment - Maintain equipment regularly to avoid excessive exhaust emissions - Reduce the speed of traffic to 30 km/h when crossing a town. On site the speed limit will be 20 km/h - Construction workers would be provided with and required to use nose masks and eye goggles - Nose masks will be replaced daily, and eye goggles will be replaced quarterly - Water the access roads regularly, especially in dry weather. Contractors will be required to regularly douse the ground with water to reduce dust emissions - - Use machines that emit less noise - Respect the rest hours of the population when the work is carried out in a locality - Use appropriate measures such as vegetation strips to avoid dust dispersion and to mitigate odors and noise - Haulage trucks and other heavy construction machineries would be serviced regularly to reduce exhaust emissions; and (two replacement trees for one felled tree) - Haulage trucks conveying excavated spoil and aggregates would be covered with tarpaulins to prevent fly offs and blow-ups <p>During the operation phase</p> <ul style="list-style-type: none"> - Establish a waste management plan for tourist sites and parks and reserves |

| Sensitive components | Risks/Impacts | Management actions/approach |
|----------------------|---|---|
| Fauna and flora | <ul style="list-style-type: none"> - Destruction of vegetation cover - Disruption of natural habitats | <p>During the construction phase</p> <ul style="list-style-type: none"> - Avoid known breeding and feeding habitats of valued or protected wildlife species - Reinforce the protection of rare or protected plant habitats and forests of interest - Limit the work to the right-of-way - Ensure compensatory reforestation in case of important felling of trees, deforestation (two replacement trees for one felled tree) and involve the forestry services in the execution of this measure - Plan the recovery of forest products resulting from deforestation and identify mechanisms for the distribution of products to the local population - If the project site is discovered as a sensitive habitat area or a critical or natural habitat as presented in ESS6, the project would engage the Department of Park and Wildlife or the Department of Forestry to develop a suitable plan - Hunting or keeping wildlife as pets among project workers and cutting natural vegetation by workers will be prohibited at project sites. Furthermore, workers would be sensitized on environmental protection and nature conservation <p>During the operation phase</p> <ul style="list-style-type: none"> - Raise awareness of the wildlife heritage and the need to preserve it among the tourism industry and the local population of parks and reserves |

| Sensitive components | Risks/Impacts | Management actions/approach |
|----------------------|--|---|
| Soils | <ul style="list-style-type: none"> - Soil pollution - Risk of soil erosion | <p>During the construction phase</p> <ul style="list-style-type: none"> - Carry out a light reprofiling during the earthworks - Compact the platforms of the work areas to stabilize them in order to reduce the effects of erosion - Avoid spilling concrete laitance on the ground - Protect the soil, particularly in the parking and/or maintenance areas of the construction equipment, to avoid any infiltration of chemical products (used oil, fuel) into the subsoil - Give preference to manual work (excavations, etc.) - Carry out the maintenance of vehicles and machines on concrete platforms, set up at the site base - Limit stripping, clearing, backfilling, and grading of work areas to what is strictly necessary - Reuse uncontaminated excavated material on site to reduce truck traffic - Provide drums for the collection of used oil for eventual recycling - Enforce regulatory measures for the opening and reclamation of quarries and caves - Operate only authorized quarries and borrow pits - Ensure the collection and disposal of waste to an authorized site - Conduct post-construction rehabilitation/reclamation - Dismantle temporary facilities (camps, accesses, crossing structures, etc.) and restore sites to their original condition. <p>During the operation phase</p> <ul style="list-style-type: none"> - Ensure waste collection at tourist sites - Avoid as much as possible the discharge of pollutants on the beaches and reserves |
| Water resources | Pollution of surface and/or ground water resources | <p>During the construction phase</p> <ul style="list-style-type: none"> - Set up drums for the collection of used oil for possible recycling - Give preference to manual work (excavations, etc.) - Waterproof the storage areas for polluting products and the parking areas for machinery using plastic film - In areas where projects are located close to water bodies, contractors would prohibit the washing of machineries and washing of vehicles 50m away from these water |

| Sensitive components | Risks/Impacts | Management actions/approach |
|------------------------|--|---|
| | | <p>bodies and be required to do periodic water quality monitoring and ensure protection of the buffer zones of such water bodies</p> <ul style="list-style-type: none"> - Areas close to water environment that are disturbed during construction activities (such as trench digging) would be rehabilitated as soon as possible after the pipes/cables have been installed to prevent erosion - Set up various low-capacity water sources, located in strategic places <p>During the operation phase</p> <ul style="list-style-type: none"> - Make fishermen aware of the impact of their activities on the attractiveness of tourist sites |
| People Lands and goods | <ul style="list-style-type: none"> - Risk of land acquisition or restriction of access - Risk of social discontent in case of occupation of public or private land | <ul style="list-style-type: none"> - Effective implementation of this ESMF and the RPF - Implementation of RAP or livelihood restoration plan - As much as possible, subcomponents of the program would avoid areas with potential displacement/involuntary resettlement issues - Screening would be done at the onset of each sub-component to determine potential areas where displacement/involuntary resettlement may occur - Prepare a Resettlement Action Plan (RAP) that allows for fair and equitable compensation/compensation in case of land expropriation - Compensate project-impacted people for loss of income - Financial compensation to replace lost land - Conduct information/awareness campaigns for people with property on the right-of-way (radio announcements, targeted meetings, focus groups, etc.) |
| Income and employment | <ul style="list-style-type: none"> - Destruction of property and disruption of economic activities - Risk of social discontent if local labor is not used - Temporary restriction of access to businesses that will likely lead to a decrease in income for small merchants, stallholders, and others - People who will be affected by the project | <p>During the construction phase</p> <ul style="list-style-type: none"> - Give priority to recruiting local labor on site (laborers, guards, handlers) - Comply with the complaint management provisions contained in the CGES/CPR, in the event of discrepancies between the work companies and the local communities, in particular - Establish local monitoring commissions to assess the admissibility of complaints and deal with them according to the amicable conflict resolution procedure - Identify potential conflicts and implement mitigation measures at an early stage, using a participatory approach that includes all potentially interested social categories - Ensure the information and participation process of the entire community, especially those affected by the project - Define and implement a code of conduct on child protection to be incorporated into the bidding documents and contracts of contractors contributing to the development of infrastructure under the Project |

| Sensitive components | Risks/Impacts | Management actions/approach |
|--------------------------------|---|---|
| | | <ul style="list-style-type: none"> - Ensure that companies apply the "local employment promotion clause - Offer employment opportunities associated with the project to both men and women, encourage women to apply and select candidates based on their skills - Establish decision-making processes that ensure the distribution of income to men and women according to their respective levels of involvement - Ensure that women are compensated for the work they do, especially if they do not share in the income - - Ensure that women are paid directly for their work, avoiding all intermediaries. |
| Cultural heritage | <ul style="list-style-type: none"> - - Risk of degradation of cultural sites - - Risk of destruction of objects from salvage excavations of the remains or project works | <ul style="list-style-type: none"> - Application of the provisions under the GBV Prevention and Response Action Plan, (Annex 5) <p>During the Planning phase</p> <ul style="list-style-type: none"> -Ensure that project activities will not impact on known cultural heritage <p>During the construction phase</p> <ul style="list-style-type: none"> - In the event of chance discovery of cultural heritage or remains in the work zones, the chance finds procedure (annex 11) must be initiated: - - Negotiate with traditional authorities for the preservation of sites and resources of cultural, religious, historical, and aesthetic importance and agree on potential compensation for the communities - During foundation excavations, ensure archaeological monitoring of sites where significant artifacts may be found and, if found, notify the appropriate authorities - Involve traditional authorities in monitoring sites and resources of cultural, religious, historical, and aesthetic significance during construction - Involve in early consultation and discussion with other partners, such as UNESCO for activities and mitigation measures of risks and impacts related to activities on the World Heritage site of Kunta Kinteh Island and Related Sites <p>During the operation phase</p> <ul style="list-style-type: none"> - Ensure the preservation of cultural heritage through awareness raising on specific themes |
| Occupational Health and safety | <ul style="list-style-type: none"> - Risk of propagation of COVID-19 - Risk of spreading STI/HIV/AIDS - Damage to the health of site workers and exposure to site accidents - Risk of work-related accidents on the construction site | <p>During the work phase</p> <ul style="list-style-type: none"> - Contractors shall prepare OHS management plan as part of their C-ESMP - Equip personnel with the appropriate PPE during the work and train them in the principles of empowerment - Ensure that provided PPE are appropriate to the type of work, and comply with technical specifications - Health control before entering and leaving the site - Reinforcement of workers' capacity on hygiene measures |

| Sensitive components | Risks/Impacts | Management actions/approach |
|----------------------|--|--|
| | <ul style="list-style-type: none"> - Risk of gender-based violence and especially SEA/SH - Risk of child labor on the site | <ul style="list-style-type: none"> - Respect of the barrier actions to fight against COVID-19 - Inform workers about the signs and symptoms of COVID-19 - Respect of hygiene and safety measures - Implementation of hand washing devices - Develop and implement a waste management plan - Take appropriate measures for public consultation: avoid public meetings, diversify communication channels, and rely more on social media - Trucks and vehicles deployed will be equipped with safety PPE such as reflective breakdown triangle, fire extinguishers, etc. - Trucks and vehicles deployed will be in good working condition, regularly serviced to avoid breakdowns in transit - Vehicle fleet management system or haulage timetable would be deployed to prevent hauling in fleets, peak traffic periods, and driver fatigue - All trucks and other equipment will follow a maintenance regime and records kept - Trucks and vehicles will be labelled with complaints and emergency phone numbers for reporting irresponsible driving - Impromptu tests on alcohol consumption levels of truck drivers - Compliance with the 30km/h speed limit driving through towns and 20km/h in construction sites - Reflectors on haulage trucks will be mandatory for hired trucks to caution other road users. - Set up a first aid kit for the work site - Signpost the work site with various signs - If necessary, put agents for safety regulation. - Respecting the resting hours of the local population - Carry out the noisiest work from 8am to 12pm and from 3pm to 6pm. - Conduct awareness and information campaigns on STI/HIV/AIDS to prevent the spread of the disease. - Prepare an emergency response plan to limit the risks associated with accidents and exceptional malfunctions - Apply general safety procedures - Develop, communicate, and implement prevention measures for construction workers, owners, and workers in the livestock sub-sector (men and women). - Sign codes of conduct with clear language prohibiting GBV/SEA/SH and ongoing training with clear sanctions in case of non-compliance |

| Sensitive components | Risks/Impacts | Management actions/approach |
|-------------------------------------|--|---|
| | | <ul style="list-style-type: none"> - Mapping of medical, psychosocial, and legal support services for GBV/SEA/SH survivors to design referral pathway and incident response protocol - Adapting the GM to respond to GBV/SEA/SH cases in a quick, ethical, confidential, and survivor-centered way - Raising awareness in the vicinity of work sites/neighboring communities about the behaviors prohibited in the codes of conduct and how to access the GM in case of non-compliance - Adequate lighting, separate sanitary facilities for men and women that can be locked from the inside, signs in public areas of the worksites reminding that GBV/SEA/SH is prohibited <p>In the operational phase</p> <ul style="list-style-type: none"> - Regulating waste management at tourist sites - Ensure proper management of fisheries waste near tourist sites - Carry out awareness-raising activities on the dangers and diseases related to tourism (sex tourism, pedophilia) - Sign codes of conduct with clear and unambiguous language prohibiting GBV/SEA/SH and ongoing training with clear sanctions in case of non-compliance - Adapting the GM to respond quickly, ethically, confidentially and in a survivor-centered way to cases of SEA/SH - Raising awareness around tourist sites/riparian populations about the behaviors prohibited in the codes of conduct and how to access the GM in case of non-compliance - Adequate lighting, separate sanitary facilities for men and women that can be locked from the inside, posters in the public areas of the sites reminding that SEA/SH is forbidden |
| Workers' influx during construction | <ul style="list-style-type: none"> - Risk of an increase in transmissible diseases (STIs, HIV/AIDS) and unwanted pregnancies - Harm to morals and risk of harm to community social values that could lead to community conflicts - Risk of violence against women and children (SEA/SH) | <p><u>During the construction phase</u></p> <ul style="list-style-type: none"> - Raise awareness among workers and local populations about the dangers of STIs, HIV/AIDS and unwanted pregnancies - Sign codes of conduct with clear and unambiguous language prohibiting SEA/SH and ongoing training with clear sanctions in case of non-compliance - Mapping of medical, psychosocial, and legal support services for SEA/SH survivors to design referral pathway and incident response protocol - Adapting the GM to respond to SEA/SH cases in a quick, ethical, confidential, and survivor-centered way - Raising awareness around the work sites/neighboring communities about the behaviors prohibited in the codes of conduct and how to access the GM in case of non-compliance - Adequate lighting, separate sanitary facilities for men and women that can be locked from the inside, posters in the public areas of the worksites reminding that SEA/SH is prohibited |

| Sensitive components | Risks/Impacts | Management actions/approach |
|----------------------|--|--|
| Living environment | <ul style="list-style-type: none"> - - Damage to the usual peace and quiet of the population - - Degradation of the living environment by the discharge of waste from the works. | <p><u>During the construction phase</u></p> <ul style="list-style-type: none"> - Improved waste management measures shall be employed and implemented, and these shall include, but not be limited to, the following: - Development of a waste management plan including waste types, expected quantities and frequency, proposed management procedures, and responsibilities. The project will include, but is not limited to, the following - Minimization of waste generation that must be treated or disposed of when waste generation cannot be avoided - Identification and classification (hazardous or non-hazardous, solid, gaseous, or liquid) and estimation of the type of waste likely to be generated, such as cleared vegetation, packaging, excess aggregates, and equipment |
| | <ul style="list-style-type: none"> - Noise and vibration | <ul style="list-style-type: none"> - The contractor shall select sensitive local access roads and choose the location of construction facilities. - Use well-maintained equipment equipped with noise reduction devices (e.g., mufflers, sound enclosures). - Institute strict controls on the timing of the loudest construction activities; prohibit night work. - Respect seasonal sensitivities (e.g., breeding seasons) and modify activities to reduce noise. |
| Social cohesion | <ul style="list-style-type: none"> - Exclusion of specific groups from consultations, especially women. - Conflict between tourism stakeholders | <ul style="list-style-type: none"> - Notify the population and local authorities of the work schedule - Do not start construction until the land ownership has been regularized/clarified - Consult affected men and women at all stages of the project - Offer the opportunity to all affected groups (men and women) to participate in the consultations by proposing appropriate consultation mechanisms (organize consultations in small groups separate by sex and age, if needed, and with the facilitator of the same sex that speaks local language) - Inform the men and women consulted of how their concerns have been taken into account - Establish a mechanism for consultation with traditional authorities to ensure that their views are taken into account during the planning and implementation phases - Before commencement of project activities through courtesy calls and for purposes of establishing cordial relationships as neighbors, in order to fulfil relevant cultural obligations - To agree on relevant socio-cultural protocols and for providing orientation to migrant employees who may settle in the community - To sensitize workers on the taboos, cultural norms, and values of the local communities; and - To discuss possible support to the traditional authority during festival celebrations. - Carry out information/awareness-raising activities for stakeholders on conflicts - Establish a consultation framework |

| Sensitive components | Risks/Impacts | Management actions/approach |
|----------------------|---|---|
| Climate change | <ul style="list-style-type: none"> - Decrease and/or disappearance of plant and wildlife species - Decrease/degradation of coastal tourist sites - Drying up of water bodies - Degradation of materials and shortening of the life span of physical infrastructures | <ul style="list-style-type: none"> - Carry out reforestation activities with species adapted to the current climatic conditions - Carry out coastal protection activities - Take into account climate change in the design and construction of infrastructure - Use materials and equipment adapted to current climate conditions - Emphasizing socially inclusive approaches to foster communities' resilience to climate - Addressing the underlying vulnerability of communities to climate and - Empowering vulnerable populations, such as women and youth for building resilience of communities at the local level - Carry out information/awareness campaigns for tourism stakeholders on the effects of climate change |

4. ANALYSIS OF ALTERNATIVES

In the context of the preparation of this environmental and social management framework, it is difficult to define alternatives; these will be specified at the level of the sub-projects to be financed. The analysis of alternatives will therefore focus on the following two situations

- the situation **without** the intervention of the project
- the situation **with** the implementation of the project

4.1. Probable evolution of the situation "without the project"

4.1.1. Negative effects of the "without project" situation

The negative effects of the "without project" situation would be the persistence of problems such as: (i) the accentuation of coastal erosion with associated consequences (ii) the progressive disappearance of sites with high tourism potential, (iii) the degradation of the tourism destination and (iv) the decrease in the contribution to the country's GDP.

Since the development of a diversified and resilient tourism is one of the main objectives of the project, the abandonment of this project would risk harming the development of tourism. Leaving tourism sites in their current state of degradation will further decrease the number of visitors. In addition, abandoning the project could also have an adverse effect on the environment indirectly, as poverty will encourage local people to exploit natural resources irrationally.

4.1.2. Positive effects of the "no project" situation

The "without project" situation would have, at least in the short term, some minor positive impacts on the immediate natural and human environment of the intervention area. In concrete terms, the current socio-environmental configuration would be maintained. In addition, socio-economic activities related to tourism would continue normally.

Ultimately, with the "no project" situation, the Gambian government will not be able to improve tourism in the country which provides economic development to the country and residents, as well as address coastal and climate resilience, and achieve important gains in closing gender gaps and addressing gender-based violence in the tourism sector

4.2. Situation "with" project

4.2.1. Positive effects of the "with project" situation

- **At the socio-economic level**

The project will improve the living conditions of the local population through sub-component 2.2, which aims to increase access to financing for tourism related MSMEs. Through its activities by financing MSMEs, the project will stimulate private investment and the creation of employment opportunities especially for youth.

The positive impacts on the tourism destination will also be significant, following the coastal protection activities. This project interventions will contribute to the preservation and restoration of lost beaches, which will result in significant benefits for the tourism industry. The integrated development of tourism products and the diversification of certain tourist areas will result in, among other things, the boosting of the untapped tourism potential and economic development of The Gambia. In other words, a significant increase in the number of visitors will be expected to benefit all stakeholders involved in tourism, including local populations.

- **In terms of the environment**

At the environmental level, the implementation of the Project should contribute to the protection and integrated management of coastal areas. The development of ecotourism in the protected reserves will encourage local communities to preserve these habitats, which constitute an attraction for popular tourism with certain benefits for the populations.

The realization of the project will minimize the negative impacts on the environmental and social environment. Indeed, projects supported by the World Bank are required to comply with the rules and fiduciary guarantees, and to fulfill environmental and social commitments. Therefore, the project will ensure that the activities to be implemented are carried out in accordance with the national environmental and social requirements in force and of the World Bank. To this end, all environmental and social safeguard documents will be prepared prior to the actual implementation of activities to identify all environmental and social constraints.

- **At the socio-cultural level**

At the socio-cultural level, with the rehabilitation of historical sites, the project will contribute to the preservation and enhancement of the tangible and intangible cultural heritage of local communities. It will help preserve history, particularly through the rehabilitation of Kunta Kinteh Island, which played a pivotal role in the transatlantic trade. Supporting and nurturing the entrepreneurial ecosystem will boost cultural and artistic production. The commercialization of traditional handicrafts and the promotion of cultural events will have a real positive impact on the population's standard of living and will help combat unemployment and reduce poverty.

- **At the institutional level**

The project will promote better institutional integration through capacity building of tourism actors and institutions. This support will encourage more strategic approaches to tourism development and market-oriented consultation/coordination for the development of the sector.

5. PUBLIC CONSULTATION, PARTICIPATION, INCLUSION AND INFORMATION

5.1. Context and objective of the consultation

Stakeholder engagement is an extremely important step in the project preparation process and a fundamental requirement of the World Bank's environmental and social standards. Engagement aims to achieve open and transparent stakeholder buy-in and commitment to the project. This is because effective stakeholder buy-in to the project can improve its environmental and social sustainability and social acceptability, and it enables stakeholders to contribute meaningfully to the design and successful implementation of the project. A separate Stakeholder Engagement Plan (SEP) has been prepared which provides a more robust analysis of stakeholder engagement for this project during preparation and the plan for ongoing engagement throughout the project lifecycle.

The purpose of consultation is to seek the participation and inputs of stakeholders and affected persons/communities in project activities and project design and to ensure inclusive project benefits.

Specifically, the objectives pursued through these various consultations are:

- To provide stakeholders with accurate and relevant information on the project, including its description, components, and issues (environmental and social risks, recommended management measures, etc.)
- To invite these stakeholders to give their opinions and concerns about the project and to gather their views on the project's problems and the positive and negative environmental and social impacts that may be generated by the project as well as the related measures
- Identify in an exhaustive way the constraints likely to jeopardize the proper implementation of the project
- Identify capacity building needs within the framework of the project
- Establish a dialogue and lay the foundation for the commitment of all stakeholders to the project's objectives.

These public consultations are very important for the implementation of the project activities (especially in the context of the ESIA's to be conducted). They should identify key issues and determine how the concerns of all parties will be addressed in the implementation of activities.

5.2. Methodological approach to stakeholder consultation

The public consultation was conducted using a participatory approach that favored group or individual interviews with the parties concerned by the project. The interviews were conducted based on a predefined interview guide. They allowed the collection of various questions, concerns, and expectations of the main stakeholders to be affected by the implementation of the project.

5.3. Summary of Stakeholder Consultations Results

The table below presents a summary of stakeholder consultations (both indirect and direct stakeholders). Details are presented in Annex 12.

The consultations took place from February 21 to 28, 2022. The main stakeholders consulted are:

- Beach Bar and restaurants' owners
- West African African Birds Study Association
- Women vegetable growers
- Young farmers
- The Association of Fishing Companies
- Oyster Women's Associations
- National Association of Artisanal Fisheries Operators (NAAFO)

- National Centre for Arts and Culture (NCAC) (for UNESCO World Heritage Site)
- Gambian Women Association of Fish and Vegetable Exporters
- Association of Fish Processors and Exporters
- Fish smokers and fish driers
- Rice farmers
- Bird watchers
- Juice pressers
- Gambia Tour Guides
- Tourist Taxi drivers
- Craft Market Vendors
- Juice and Fruit Vendors in tourist areas
- Women associations working in trade or service provision related to tourism
- Horse riders
- Bumsters
- Hairdressers in tourist areas
- Sex workers
- Ground tour operators (hotels)
- Contractors, suppliers, and their workers
- Village Development Committees, including women, youth, and elder councils in communities around tourism sites
- Village chiefs known locally as "Alkalo"
- Police in the tourism development areas

Table 12: Summary of public consultations

| Stakeholders consulted | Opinions/concerns | Recommendations |
|---|---|--|
| National Environmental Agency (NEA) | <ul style="list-style-type: none"> ▪ Time-consuming coastal engineering at tourist sites can reduce tourist attraction ▪ Lack of understanding of environmental impact assessment; government perceived it as a waste of resources ▪ Non-compliance with EIA protocols by the government project | <ul style="list-style-type: none"> ▪ Carry out the studies in accordance with the EIA/EIA guidelines and procedures ▪ Conduct proper stakeholder mapping and analysis ▪ Designate the right institution with the mandate and technical know-how to take the lead ▪ Need for the project to focus on sensitization and capacity building of implementing partners |
| Minister of Tourism and Culture | <ul style="list-style-type: none"> ▪ Congestion of some businesses located along the estuary during works related to the protection of erosion zones ▪ Risks of tensions between actors involved in the tourism sector and whose interests are often divergent | <ul style="list-style-type: none"> ▪ As part of the project, rehabilitate and/or build some infrastructures ▪ Focus on the sites most affected by erosions ▪ Integrate the socio-economic support of tourism actors, especially the most vulnerable, such as young men and women sex workers ▪ The project should increase sensitization about compulsory land acquisition procedures including the compensation payments. |
| Gambian Tourism Board (GTB) | <ul style="list-style-type: none"> ▪ Weak communication and synergy between tourism stakeholders ▪ Existence of a multitude of tourist sites affected by environmental problems related to both climate change (coastal erosion) and anthropogenic pressure (fish remains dumped on the beach, pollution) | <ul style="list-style-type: none"> ▪ Promote ecotourism and integrated tourism ▪ Review the key to the distribution of resources from the sector between the different actors ▪ Strengthen the capacities of actors ▪ This is in line with project objectives but the need to be inclusive of vulnerable groups |
| National Center for Arts and Culture | <ul style="list-style-type: none"> ▪ There are many cultural varieties including religious tourism that can be a good business opportunity | <ul style="list-style-type: none"> ▪ Create museums throughout the country to enhance the potential of tourism |

| Stakeholders consulted | Opinions/concerns | Recommendations |
|--|---|---|
| | <ul style="list-style-type: none"> ▪ Risk of conflict if there is discrimination, especially for local communities | <ul style="list-style-type: none"> ▪ To give the communities of Kunta Kinteh Island the opportunity to find work during the implementation of the project ▪ Elaborate a Cultural Heritage Management Plan (CHMP) ▪ Take into consideration the projects carried out by UNESCO |
| Minister of Environment, Climate change and Natural resources | <ul style="list-style-type: none"> ▪ The Ministry of the Environment is very interested in the project, one of the components of which concerns erosion zones ▪ Pollution in tourist areas (fish remains, poor solid waste management) ▪ Problem of coordination of interventions between the different institutions and agencies concerned with tourism matters | <ul style="list-style-type: none"> ▪ To find a synergy of intervention between all the entities of the Ministry to allow to go in depth on certain questions ▪ To develop ecotourism through the potentials of the country |
| Manager of the Gambia River Park | <ul style="list-style-type: none"> ▪ The park offers many opportunities with the development of related businesses ▪ Fragility of the island due to the configuration of the environment ▪ Difficult relationship with local communities <p>Risk of degradation of the ecosystem due to the influx of tourists</p> | <ul style="list-style-type: none"> ▪ Protect the park and the chimpanzees ▪ Support the park managers in raising awareness among the local communities and other tourism actors who can act as relays in terms of information and awareness among tourists visiting the site ▪ Control fishermen to prevent them from operating near the park ▪ Project to sensitize and find ways of greater participation of local communities in protecting the park |
| Minister of Gender, Children and Social Welfare | <ul style="list-style-type: none"> ▪ Domestic violence against women ▪ Degradation of the country's image due to sex tourism/exploitation and sexual abuse of children | <ul style="list-style-type: none"> ▪ Support the Ministry in staff building capacity ▪ Supporting young girls and boys sex workers to find alternative activities so they can quit sex work |

| Stakeholders consulted | Opinions/concerns | Recommendations |
|-------------------------------------|--|---|
| Department of Lands | <ul style="list-style-type: none"> There is no land use plan that defines various designated land uses or the land policy act Encroachment of people by building unnecessary structures on tourist development areas and real state agencies | <ul style="list-style-type: none"> Preservation and protection of reserve lands for designated purposes The provision of a cadastral mapping system for easy identification of all sites |
| Kunta Kinteh Island | <ul style="list-style-type: none"> The project came on time because the island is about to disappear completely. We hope that the project will provide an urgent and adapted response to stop the harmful progress of the sea towards the island. | <ul style="list-style-type: none"> Provide in the project an emergency intervention to stop erosion and save the island Upstream of the island (embarkation area) help communities develop economic activities |
| Sex workers in tourist areas | <ul style="list-style-type: none"> Experience harassment, abuse, and exploitation (both sexual and financial) | <ul style="list-style-type: none"> Supporting sex workers to transition to other business opportunities and employment for better jobs Provide scholarships to enable those interested to return to school or vocational training institutes for employment opportunities Support women workers through the establishment of a reintegration and counseling center |

5.3.1 Institutional acceptability of the project

An active participation and a good understanding of the issues of the project by the various stakeholders were noted. All the stakeholders consulted welcomed the tourism resilience and diversification project, which they believe will help solve many of the problems plaguing the tourism sector. The analysis of the results of the different consultations conducted showed a total acceptance of the project by all the stakeholders met. The latter has further highlighted the positive impacts that will potentially be induced by the project in terms of

- considerable reduction of coastal erosion risks through the construction of protective structures along the affected areas
- production and dissemination of reliable data on the tourism sector
- Facilitating access to tourist sites by improving road infrastructure
- improving maritime transport by providing equipment and means of maritime transport to facilitate access to remote sites (islands)
- the impetus of a collaborative dynamic and a synergy between the different entities involved in the tourism sector.
-

Overall, stakeholders welcomed the Project, and they raised their concerns and offered recommendations for the improvement of the tourism industry. These concerns are also reflected in the mitigation measures. Annex 12 provides more information on these consultations as well as on the Stakeholder Engagement Plan which was prepared for the project.

6. ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

This section presents the major guidelines for the environmental and social management of the project, considering the requirements of the Gambia's environmental legislation and the requirements of the World Bank's Environmental and Social Standards. These guidelines include the screening process, the development of environmental and social requirements (ESMP), capacity building for ESMP implementation, periodic reporting on ESMP implementation, and periodic monitoring of environmental and social implementation. The ESMF will be included in the project Implementation Manual.

6.1 Objectives of the Environmental and Social Management Plan

The objective of the ESMP is to describe the institutional mechanisms for:

- i* describing the environmental screening process to identify potential environmental and social impacts of project activities and the implementation of proposed mitigation measures
- ii* periodic monitoring of the implementation of environmental and social measures
- iii* capacity building for ESMP implementation
- iv* related cost estimates and timelines; and
- v* periodic reporting on ESMP implementation

6.2 Mitigation measures for potential risks and impacts

Depending on the results of the selection and classification of the sub-projects, some of the project's activities could be subject to an Environmental and Social Impact Assessment (ESIA) or Environmental and Social Management Plan (ESMP) before any startup or a Resettlement Action Plan (RAP) in case of involuntary displacement (displacement of people, loss of property, loss of sources of income, etc.). These environmental and social studies will determine more precisely the nature of the measures to be applied for each sub-component of the sub-project. In case such studies are not necessary, simple environmental and social measures, to be carried out both during the construction phase and during the operation period, can be applied according to the measures below. The table below includes a list of mitigation measures for the negative impacts identified in chapter 4 above.

6.3 Environmental and Social Analysis and Screening Process and Responsibilities for Implementation of Subprojects

The Project will comprise several investments/sub-projects, generally of medium to high magnitude, which will be identified, prepared, and implemented during the life of the project. To be accepted, these sub-projects will have to comply with both the World Bank's environmental and social standards and the Gambia's national procedures. For this purpose, the subprojects will have to go through a screening process to determine the potential environmental and social risks of the subproject activity. The screening process is based on the national laws and the requirements of the World Bank.

6.3.1 Environmental and social screening steps

The environmental and social screening of a project consists of identifying, describing, and characterizing the potential positive and negative environmental and social impacts that may be generated during the pre-construction phase, the construction phase, and the operation phase of the project. The screening determines what type of socio-environmental assessment mitigation measures are required and the appropriate instruments to be used, if any, given the types of activities planned.

The different stages of the environmental and social screening process are identified in the following paragraphs. The extent of the environmental and social measures required for the activities will depend on the outcome of the screening process, which aims to: (i) determine which activities are likely to have adverse environmental and social impacts; (ii) determine appropriate mitigation measures for activities with adverse impacts; (iii) identify activities requiring separate ESIA's; (iv) describe the institutional responsibilities for analysis and approval of screening results, implementation of proposed mitigation measures, and preparation of separate ESIA reports; (v) monitor environmental parameters during infrastructure construction and subsequent operation and maintenance; and (vi) identify activities that may involve land acquisition.

The national environmental legislation categorizes projects according to the scale of the anticipated impacts: (i) Category A when a full EIA study is required; (ii) Category B when limited Environmental Study (Preliminary Environmental Impact Assessment) is necessary; (iii) Category C when the project does not require an EIA although approval may be with conditions.

To comply with the requirements of the World Bank's environmental and social standards and national legislation, the screening of sub-projects should include the following steps

- Identification of project activities likely to have negative environmental and social impacts
- Identification of activities requiring ESIA's/ESMP requirements
- Development of appropriate mitigation measures
- Description of institutional responsibilities for (i) analysis and approval of screening results, implementation of proposed mitigation measures, and preparation of ESIA/ESMP reports, (ii) monitoring of environmental indicators.

Thus, to make the environmental and social risk management effective, the responsibilities in the execution of each stage of the environmental and social management of the sub-projects are assigned to the stakeholders. Also, this sharing of roles was guided by the administrative organization of the structures responsible for the environment in The Gambia. The Ministry of the Environment has a central NEA that is responsible for the environmental assessment process.

The environmental and social screening process to determine the nature of the environmental measures to be considered includes the following steps:

Step 1: Completion of the environmental and social selection form

Step 01 requires that each project to be financed by the World Bank requires an environmental and social screening to determine the type of environmental assessment instruments that may be used. All sub-projects will be screened to determine the extent of their foreseeable environmental and social risks and to define the required documentation. An Environmental and Social Screening Form will be completed (See Annex 5). This form will assess the nature of the sub-project, the scope and level of potential environmental and social risks (high, substantial, moderate, or low risk), as well as the characteristics of the proposed works/developments, their potential environmental and social risks, or impacts. The E&S screening process report will be submitted to the World Bank for validation of the result regarding sub-project risk rating as well as proposed E&S due diligence to be conducted.

The filling of the initial selection form will be done by the environmental and social experts of the PIU in collaboration with the NEA. In this filling process, the local communities will take an active part in the collection and analysis of the information. In addition to potential environmental and social impacts, the screening results will also indicate: (i) the need for the land acquisition as well as physical and/or economic displacement; and (ii) the type of public consultations that were conducted during the screening exercise.

Commented [ML1]: Are you referring to the validation of the classification? Please clarify to avoid any confusion with "Step 2: Validation of the selection and environmental and social classification of activities"

Commented [TM2R1]: Screening form filled will be submitted to the WB

To comply with the requirements of the World Bank's Environmental and Social Framework, the Project's activities likely to have direct or indirect impacts on the environment be classified into four categories:

High risk: Investments/sub-projects are likely to have significant environmental impacts. An environmental impact assessment study will help integrate environmental considerations into the economic and financial analysis of the project. This category requires a thorough environmental assessment with an Environmental and Social Management Plan (ESMP). In addition, in the event of physical or economic displacement, the ESIA/ESMP will be supplemented by a Resettlement Action Plan (RAP). *These subprojects require a detailed impact study accompanied, if necessary, by a Resettlement Action Plan, or other E&S instruments as required under the assessment.*

Substantial risk: investments/subprojects with significant environmental and social impacts and risks that are reversible based on the implementation of avoidance and/or mitigation measures. An in-depth impact assessment will therefore be required to evaluate the impacts and propose management measures. In addition, in the event of physical or economic displacement, the ESIA/ESMP will be supplemented by a Resettlement Action Plan (RAP). Consequently, the specifications of the contractors responsible for the works, if any, will imperatively contain all the technical devices and mitigation measures planned, as well as a monitoring and control system that respect the standards in force (including the safety of workers and local populations). *Under national regulations, these projects require a detailed impact study and, if necessary, a Resettlement Action Plan or other E&S instruments as required under the assessment.*

- **Moderate risk:** the investments/subprojects have limited environmental impacts, or the impacts can be mitigated by applying measures or changes in their design. *Under national regulations, these sub-projects can have easily identifiable and limited impacts and the means of mitigation are generally known. These require Environmental and Social Impact Assessment proportional to risk.*
- **Low risk:** investments/subprojects that do not require an environmental and social study. *This category is equivalent to low-risk sub-projects with minor negative impacts on the biophysical and human environment as defined by national legislation, which nevertheless requires them to be declared and risks/impacts to be mitigated in an ESMP.* It should be noted that the Project has been classified as a substantial risk by the World Bank in view of the nature of the activities it may require and their sensitivity, which corresponds to category A according to national legislation. In this respect, the results of the selection should lead to sub-projects with substantial, moderate, or low risk.

Any sub-project with a high-risk rating will request, before being implemented, further clearance by the WB as this will induce a change in the overall project risk rating and the update of the ESCP.

Step 2: Validation of the selection and environmental and social classification of activities

The initial completed screening forms will be forwarded to the NEA for approval by the Environmental specialist of the PIU. . Thus, the project Environmental and Social specialists will work closely with the NEA to ensure the analysis of the information contained in the forms. After analyzing the information contained in the screening results and determining the extent of environmental work required, the Environmental and Social specialists the Project implementation Unit (PIU) in close collaboration with

NEA will make a recommendation as to whether: (a) environmental work will not be required; (b) application of environmental and social requirements will suffice; or (c) an ESIA should be conducted.⁴⁸

Step 3: Carrying out the environmental and social "work"

When an ESIA is required

When an environmental and social assessment (ESIA) including an Environmental and Social Management Plan (ESMP) is required, the Environmental and Social Safeguards Manager of the Project Implementation Unit (PIU) will perform the following activities:

- The Environmental and social specialists of the PIU will prepare the Terms of Reference for the Environmental and Social Assessment and submit to the NEA for review and approval and to the Bank for No Objection. In accordance with national legislation, the NEA will notify the Project Implementation Unit (PIU) of amendments to the TOR based on comments or their validation. The Project Coordination Unit may be requested to supplement information. The model TOR for a standard Environmental and Social Assessment (ESIA) is in Annex 6)
- Recruitment of qualified consultants to conduct the required Environmental and Social Assessments
- Conducting the stakeholder engagement as per the Stakeholder Engagement Plan (prepared separately)
- Preparation of ESIA/ESMP reports by the consultants

Any investment/subproject whose implementation results in involuntary physical, economic, or access restriction displacement is required to develop a Resettlement Plan (RP), the level of detail of which depends on the number of people affected. The procedure in this case is specified in the RPC.

When an environmental and social study is not required

In this case, the investment/subproject will be subject to environmental and social requirements (ES&S), so the Environmental and Social Safeguards Officer of the Project Implementation Unit (PIU) will consult the ESMC and the mitigation checklist to select appropriate mitigation measures.

Step 4: Review, approval of ESIA reports including public hearings and dissemination and obtaining Environmental Authorization.

If environmental and social impact assessment (ESIA) is required, the environmental and social study reports will be submitted by the Project Implementation Unit Coordinator for review and approval by NEA and the World Bank.

NEA in conjunction with the regional technical services will ensure that all environmental and social impacts have been identified and that effective, realistic, and feasible mitigation measures have been proposed as part of the sub-project implementation.

The validation of the ESIA and the preparation of a reasoned opinion by the NEA following the validation workshop will trigger the decision of the Minister in charge of the Environment, which will be notified to the Project Implementation Unit in the form of an Environmental Compliance Certificate.

The ESMP thus contained in the ESIA constitutes a commitment and an obligation for the Project.

Step 5: Integration of environmental and social provisions in the tender documents

⁴⁸ The project will only financially support investments/sub-projects that have gone through this screening process and for which the required documentation has been prepared and validated. The Project Coordinator will submit the selection report to the WB for clearance and approval of the results.

The integration of environmental and social provisions into the sub-projects is the key step in taking the measures into account in the financing of the sub-project. Thus, this integration will be done:

- If ESIA's are carried out, the Environmental and Social Safeguards Specialists of the Project implementation Unit (PIU) will ensure that the recommendations and other environmental and social management measures resulting from these studies are incorporated into the bidding documents. In addition, it will append environmental and social clauses to the tender documents (see Annex 4) and to the execution of the investments/subprojects, including binding clauses with sanctions in case of non-compliance, particularly in the implementation of specific measures.
- In the case of low-risk sub-projects: environmental and social requirements will be included in the Request for Proposals (RPF) so that they are carried out as part of the sub-project implementation.

The cost of implementing the environmental and social measures must be included in the sub-project costs as a separate line item in the price schedule and the works specification document.

The PIU will only be able to appraise the execution of the project's technical files when all environmental and social due diligence is effectively considered and integrated into the files.

Step 6: Approval of the Contractors-ESMP

Before starting the civil works, the contractor is required to submit a contractor Environmental and Social Management Plan (C-ESMP) including a grievance mechanism for workers and management of SEA/SH risks, a Waste Management Plan (WMP) and an Occupational Health and Safety Plan (OHSP) to the Owner Engineer (OE). Annex 7 presents the structure of a subproject ESMP which is to be included in the bidding documents. After Bank non-objection, the C-ESMP should be implemented by the contractor..

Step 7: Implementation of environmental and social measures

For each activity, companies are responsible for implementing environmental and social measures.

They will be supervised at the level of the contractor by a person in charge designated for this purpose. The operation of the building site is centralized around the Director of Works to which is attached directly the management of the environment, health, and safety at work on the building site ensured by the Environmentalist of the Company. The responsibilities of this last are:

- (i) the overall respect of their commitments towards the project owner
- (ii) the respect of the commitments regarding the implementation of environmental and social measures
- (iii) the provision of reports and other required documents integrating the management of environmental and social measures to efficiently ensure the supervision of the environmental and social management during the construction site.

Step 8: Environmental and social monitoring and follow-up

Environmental monitoring of the activities will be conducted as part of the overall project monitoring system. The environmental monitoring concerns both the implementation phase and the operation of the infrastructures to be realized with the support of the project. The environmental monitoring makes it possible to check and appreciate the effectiveness, the effectiveness, and the efficiency of the implementation of the environmental and social measures, hygiene, health, and safety of the Project

- During the construction/rehabilitation works, monitoring will be undertaken by the Environmental/Social Specialists of the Owner Engineer (OE) who will be recruited by the project. This monitoring will go hand in hand with the timing of the impacts and the proposal

of prevention, mitigation, or compensation measures. The Owner Engineer (OE) will prepare and submit to the project monthly reports on the environmental and social compliance of the work site. The review and approval of the C-ESMP need to be mentioned in the TOR of the Owner Engineer.

- Internal supervision at the national level will be provided by the Environmental and Social Safeguards Specialists of the Project implementation Unit (PIU) of the project supported by the designated Specialists of the Structures Responsible for the relevant activities within the Ministries of Tourism and Environment. They are responsible for producing quarterly reports on the project's environmental and social compliance. The PIU will share these reports with the World Bank and NEA. This monitoring program may allow, if necessary, to redirect the work and possibly improve the progress of the construction and implementation of the various project components.
- National/regional external monitoring will be carried out by NEA's central and regional offices whose mandate is to monitor the environmental and social compliance of projects and programs, based on ESMPs. This monitoring will involve communal authorities. This monitoring is essential to ensure that:
 - (i) impact predictions are accurate (effects monitoring)
 - (ii) prevention, mitigation, and compensation measures achieve the desired objectives (effects monitoring)
 - (iii) regulations and standards are met (compliance monitoring); and
 - (iv) environmental operating criteria are met (inspection and monitoring).
- External monitoring will be carried out during joint World Bank support missions. These missions will ensure that environmental and social indicators are monitored, and that corrective action is taken if monitoring results indicate, for example, a deterioration in environmental quality.
- During the operation phase of the sub-project, the project PIU will ensure the establishment and training of management committees to develop and ensure the implementation of environmental, social, health and safety measures.
- The evaluation will be carried out by consultants (national and/or international), at mid-term and at the end of the project.

6.3.2 Responsibilities for the implementation of the environmental and social procedure

Table 11 below provides a summary of the steps in the sub-projects' socio-environmental analysis procedure and specifies the institutional responsibilities for selecting and preparing the project appraisal and implementation of project sub-projects activities.

Overall, for a successful implementation of Environmental and Social Safeguards aspects, but also Gender and vulnerability (SEA/SH/VAC) and Occupational Health and Safety (OHS), and stakeholder engagement and inclusion, the project will have a Social and Environmental Safeguards Unit comprised of the following Specialist:

- a) Core E&S team:
 - One Environmental Specialist (ES)
 - One Social Development Specialist (SDS), and
 - One Gender-Based Violence Specialist (SEA/SH)
- b) Support Team:
 - One Stakeholder Engagement/Communication Consultant
 - One Occupational Health and Safety Consultant

Figure 8: Project Environmental and Social Risk Management Institutional Arrangement

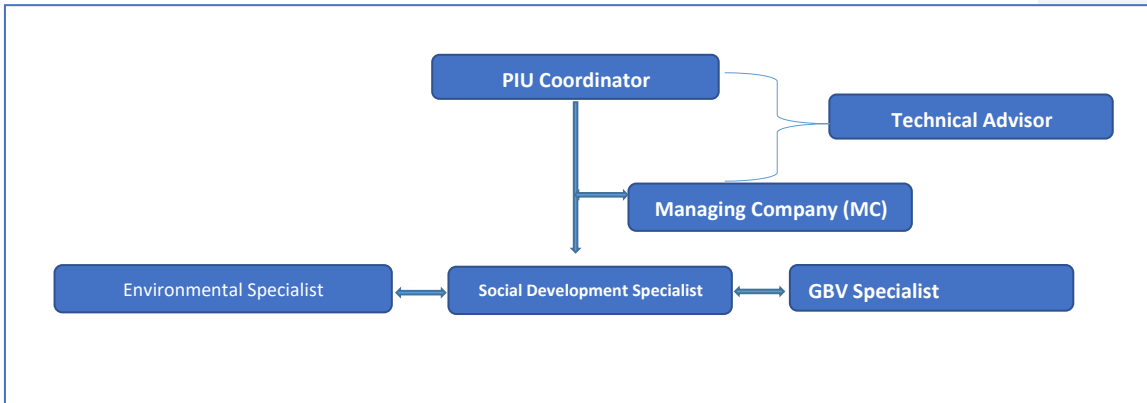


Table 13: Summary of procedural steps and responsibilities

| No | Step | Activity | Manager | Support/ Collaboration |
|----|---|---|--|--|
| 1. | Completion of the form and environmental and social classification | <ul style="list-style-type: none"> • Environmental and social characterization of the site <ul style="list-style-type: none"> ○ Identification of the location/site ○ Main technical characteristics of the sub-project ○ Identify the nature and extent of the environmental and social impact of the subproject • Environmental selection and determination of the type of specific safeguard instrument (ESIA or PE&S) | <ul style="list-style-type: none"> • PIU Environmental Safeguard Specialist (ESS)/Social Safeguard Specialist (SSS) – including GBV Specialist (EAS/SH) <p>Note: The Managing Company (MC) responsible for the implementation of sub-component 1B (Matching Grant Scheme) will lead the screening of all proposals submitted by MSMEs applying for the funding of their proposals/businesses. Once screened, the Project PIU will then share the outcomes for the development of the relevant site-specific safeguard instruments</p> | <ul style="list-style-type: none"> • NEA • Municipalities • Technical departments of the Ministries of Tourism, Environment, Roads • Tourism Business owners/stakeholders • Managing Company (MC) |
| 2. | Approval of sub-project categorization | Validation of the selection and environmental and social classification of activities | <ul style="list-style-type: none"> • E&S PIU Specialists – For subcomponent 1B, MC will submit the packages to the Coordinator, PIU, for validation and consideration thereafter | <ul style="list-style-type: none"> • PIU's /SSS of the Project PIU • MC Team • World Bank |
| 3. | Environmental and social studies carried out: Preparation of the specific E&S risk management instrument of the sub-project category: Substantial and Moderate | | | |
| | 3.1. When an ESIA is required | Preparation of the TOR | NEA World Bank | • PIU ESS/SSS |
| | | Approval of the TOR | • NEA • World Bank | ESS/SSS of the Project PIU NEA World Bank |
| | | Carrying out the required environmental and social studies, including public consultation | • Consultant | <ul style="list-style-type: none"> • ESS/SSS of the Project PIU • Project Procurement Specialist (PPS) • Technical departments of the Ministries of Tourism, Environment, Roads |

| | | | | |
|----|---|--|---|--|
| | 3.2 When site-specific E&S studies are requested | Carrying out the required site-specific environmental and social studies, including public consultation & disclosure | Consultant (under the leadership of MC and the PIU safeguards team) | <ul style="list-style-type: none"> MC Team PIU ESS (Inform the WB) |
| | 3.3. When an environmental and social study is not required | Elaboration of environmental and social requirements | <ul style="list-style-type: none"> PIU ESS/SSS | <ul style="list-style-type: none"> Technical departments of the Ministries of Tourism, Environment, Roads |
| 4. | Review, approval of ESIA and site-specific safeguards reports including public consultation, participation & Inclusion | Review and approval of subprojects requiring ESIA or NSIA in <i>ad hoc</i> committee | <ul style="list-style-type: none"> NEA PIU SSS/ESS WB (reviews/provides clearance) | <ul style="list-style-type: none"> PIU SSE /SSS |
| | Hearing dissemination, obtaining Environmental Authorization | Validation of the document and obtaining the environmental authorization | <ul style="list-style-type: none"> NEA PIU SSS/ESS | <ul style="list-style-type: none"> Technical departments of the Ministries of Tourism, Environment, Roads Local Authorities PIU SSS/ESS World Bank |
| | | Disclosure of the document | | World Bank PIU |
| 5. | Integration of environmental social provisions in the tender documents as well as Contract | The mitigation measures of the sub-projects site - specific ESMP that have undergone ESMP or C-ESMP will be directly integrated into the RFP along with the environmental and social clauses | <ul style="list-style-type: none"> PIU ESS/SSS | World Bank |
| | | The environmental and social requirements of low-risk subprojects are translated into environmental and social clauses and integrated into the tender documents & Contracts | <ul style="list-style-type: none"> PIU ESS/SSS | <ul style="list-style-type: none"> World Bank |
| 6. | Approval of Contractor ESMP (C-ESMP) | | <ul style="list-style-type: none"> Monitoring OE's PIU ESS/SSS NEA | <ul style="list-style-type: none"> NEA World Bank |
| 7. | Implementation of environmental and social measures | | <ul style="list-style-type: none"> Companies PIU ESS/SSS | <ul style="list-style-type: none"> Consultant NGO Local Authority Owner Engineer |
| 8. | Environmental monitoring and supervision (including Capacity Building & Strengthening) | | | |

| | | |
|--|---|---|
| 8.1. Proximity/close - monitoring | <ul style="list-style-type: none"> Monitoring Owner Engineer Managing Company | <ul style="list-style-type: none"> Providers/Companies |
| 8.2 Capacity Building & Strengthening | <ul style="list-style-type: none"> PIU ESS/SSS | <ul style="list-style-type: none"> PIU ESS/SSS NEA World Bank |
| 8.3. Internal supervision of the implementation of E&S measures | <ul style="list-style-type: none"> PIU ESS/SSS | <ul style="list-style-type: none"> Monitoring Owner's Engineer Providers/Companies Municipalities Technical Services Monitoring and Evaluation Specialist (M&E) |
| 8.4. External environmental and social monitoring and evaluation | <ul style="list-style-type: none"> NEA | <ul style="list-style-type: none"> PIU ESS/SSS Contractors/OE Municipalities, Technical Services |
| 8.5. Supervision | <ul style="list-style-type: none"> World Bank | <ul style="list-style-type: none"> PIU ESS/SSS Contractors/OE Municipalities Technical Services |
| 8.6. Evaluation/Audit of the implementation of E&S measures | Consultant | <ul style="list-style-type: none"> PIU ESS/SSS NEA World Bank Municipalities, Technical Services |
| Project Safeguards compliance closure | PIU ESS/SSS | <ul style="list-style-type: none"> PIU NEA World Bank |

6.4 Institutional mechanism for implementing

The implementation of the environmental measures of the ESMF will have to involve different actors in particular, the Project Implementation Unit (PIU), the NEA, the concerned communities, NGOs, and civil society organization, etc. This section presents the institutional arrangements involved in the implementation of environmental and social measures related to the Project. The table below provides a summary of the institutional responsibilities for the selection and preparation, appraisal, approval, and implementation of subprojects.

Table 14. Institutional arrangement for environmental & social management

| Concerned Institutions | Responsibility for the environmental & social management of the Project |
|--|---|
| Project implementation Unit (PIU) | Environmental and social management will be carried out by the Project Implementation Unit (PIU). It is responsible for the environmental, social, hygiene, health, and safety compliance of the Project, for the preparation of assessments and capitalization and |

| Concerned Institutions | Responsibility for the environmental & social management of the Project |
|------------------------|---|
| | <p>completion and for obtaining the permits and authorizations required by the regulations. It will not deliver the work order to start onsite activities until the C-ESMP has been approved. In addition, the PIU reports to the steering committee and ensures that the World Bank and other stakeholders receive all environmental and social monitoring reports. The PIU will recruit (i) an Environmental Specialist (ES), (ii) a Social Development Specialist (SDS), one GBV specialist, one OHS Consultant, and one Stakeholder Engagement/Communications Consultant</p> <ul style="list-style-type: none"> • The Project Coordinator is responsible for the quality of the personnel in charge of environmental and social management, GBV as well as OHS and Communication; and for the publication of the safeguard documents drawn up. The Project Coordinator is also responsible to submit documents to the NEA Regional Office and the World Bank. The project coordination will also recruit NGOs for sensitization, mobilization, and social support; training of other actors in environmental and social management; monitoring/evaluation of the implementation; it will ensure the dissemination of the ESMF.. • The PIU Environmental and Social Safeguards Specialists have overall responsibility for the monitoring the implementation of E&S material measures set out in this ESMF, ESCP, LMP, SEP, RPF and other site specific environmental and social instruments to be prepared during project implementation. They will also prepare quarterly monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project. In conjunction with local Government technical staff, they will be responsible for the preparation of the environmental and social selection forms for sub-projects. In addition, they will be co-responsible for the screening and establishment of the sub-projects environmental and social guidelines for. To this end, they will work in close collaboration with the National environmental agency (NEA). The three Experts (Environmental, Social and GBV) as well as the two consultants (the OHS, and Stakeholder Engagement/Communications consultants) will ensure internal monitoring of the implementation of environmental and social measures. The two specialists coordinate the implementation of Information, Education and Awareness Programs in the communes benefiting from the infrastructure works to provide information on the nature of the works and the environmental and social issues at stake during the implementation of the project's activities. • The Procurement Specialist of the PIU participates in collaboration with the Environmental and Social specialists in the recruitment of consultants for environmental and social studies/services. He/she is responsible for the preparation of tenders and contracts. |
| The World Bank | <ul style="list-style-type: none"> • Oversight of the Implementation of environmental and social requirements for the project |

| Concerned Institutions | Responsibility for the environmental & social management of the Project |
|--|---|
| | <ul style="list-style-type: none"> • Approval of prepared TORs for E&S studies • Monitoring the progress of the environmental and social studies • Verification of the conformity of the study with the terms of reference • Verification of the compliance of the activities with the WB requirements, especially the environmental and social standards • Supervision/implementation support mission for the assessment of field works and level of compliance |
| The National Environment Agency | <p>The NEA through the regional offices in collaboration with the ESS and SSS will participate in the environmental classification of activities. It is responsible for:</p> <ul style="list-style-type: none"> • Validating the level of environmental and social assessment to be applied to activities • Approval of project notices and/or TORs for activities requiring ESIA • Approval of the ESIA as well as. • At the local level, the NEA will rely on the TACs for proximity monitoring • Issuance of the Environmental and Social Compliance Certificate to the TGRDRP and environmental authorizations for the implementation of activities • Verification of compliance with the environmental and social specifications (ESMF) by the project and its contractors • Monitoring, evaluation, and control (in case of ESIA or ESMP). |
| Contractors | <p>The contracting companies shall prepare and submit the (C-ESMP) including all the site-specific plans for each activity of the project 30 days before the physical start of the civil works. They must carry out the environmental and social measures and respect the directives and other environmental prescriptions contained in the works contracts. To this end, the companies must have a Health, Safety and Environment Manager who will be responsible for implementing the various safeguard documents and drafting reports on the implementation of the said ESMP.</p> |
| Consultants, Design Offices | <p>The Consultants and Consulting Firms ensure the completion of the required environmental and social studies, including the ESMP in accordance with the requirements of the World Bank's environmental and social standards. They will also ensure that the ex-post evaluation (external audit) is carried out.</p> <p>During construction phase, the engineering and control offices acts as project manager and ensures the effectiveness and efficiency of the monitoring of environmental and social measures and the consistency with the directives and other environmental prescriptions contained in the construction contracts. The control offices are responsible for monitoring and implementing the site specific ESMPs including C-ESMP, with a supervisor specialized in Health, Safety and Environment on their teams.</p> |
| Civil Society Organizations | <ul style="list-style-type: none"> - Civil society organizations (CSOs) and community associations: In addition to social mobilization, they will participate in raising |

| Concerned Institutions | Responsibility for the environmental & social management of the Project |
|---|---|
| | awareness among the population and monitoring the implementation of the ESMF, particularly the ESMP, by challenging the main Project stakeholders. These civil society organizations (CSOs) will also participate in the implementation of the SEP, including communication and stakeholder engagement activities of the Project. These NGOs, CSOs and other environmental and social organizations will also be able to participate in the implementation of the ESMF measures. |
| Local authorities, Local communities | Local and regional authorities and communities must be involved and participate in the environmental and social screening of sub-projects, in the close monitoring of the implementation of the ESMP recommendations, and in information and awareness-raising activities for the beneficiary communities. They will be able to provide support for the implementation of mitigation measures in the public consultation component and the complaints management process. |
| Committee for the resolution of complaints | <ul style="list-style-type: none"> - Record, categorize and prioritize the grievances according to severity and immediacy of the issue, and provide timely, fair, accountable resolution to grievances at the project level - Ensure multiple and accessible channels for all stakeholders, especially those who are vulnerable or disadvantaged - Settle the grievances via consultation with all stakeholders (and inform stakeholders of the solutions, obtain their views on the outcome, and ensure they understand possible next steps to escalate if they are not satisfied with the outcome) - Prevent the risks and mitigate the impacts of SEA/SH by facilitating access to GBV services, raising awareness on SEA/SH amongst workers and community and enforce sanctions against perpetrators in line with the code of conduct of the project - Forward any unresolved cases to the relevant authority - Regularly analyze grievances to assess if there are systemic issues in the project that should be addressed to mitigate the same types of issues being reported |
| Owner Engineer | <ul style="list-style-type: none"> - Work closely with contractors' companies and offices to ensure timely and efficient compliance on safeguards and implementation schedule - Report monthly/quarterly to project management on the overall implementation schedule and project safeguard's compliance |
| Municipal Service in charge of the Environment | <ul style="list-style-type: none"> - Support the town hall in filling out the screening form - Support for the implementation of environmental and social measures in the field, including the pre-selection of micro-project sites - Support in monitoring and reporting. |
| | - |

6.5 Capacity building, awareness raising, and sensitization plan

The World Bank's Environmental and Social Standards for projects and their subprojects to be financed require that "in each case the national and local institutions to be involved in the appraisal and approval of the subprojects be identified along with their respective roles and responsibilities" and that capacity building programs be undertaken as needed to fulfill these roles. Indeed, the environmental and social sustainability of World Bank-financed projects involving multiple subprojects depends on the capacity of the relevant actors to carry out the related work of designing, planning, approving, and implementing environmental and social aspects. Therefore, to ensure this capacity, it is essential that the project allocate sufficient resources to training and capacity building.

6.5.1 Assessment of the capacities of the actors

The institutional analysis aims to identify certain structures in place and assess their capacity to adequately manage environmental and social aspects and, if necessary, to identify the capacity building required in the implementation of the ESMF. The table below presents the results of the analysis of the environmental and social management capacities of the main actors involved in the implementation of the environmental and social aspects related to the environmental management of investments/sub-projects.

Table 15. Analysis grid of the environmental and social management capacities of the main actors involved in the implementation of the project

| Institutions | Role of the institution and its link with the Project | | Environmental and social management capabilities | - Need for capacity building |
|---------------------|--|--|---|---|
| | Assets | | Limits | |
| Ministry of Tourism | Ensures the management of the activities of the tourism sector | Has qualified executives and regional representations with a lot of experience in the field of tourism | Insufficient understanding of the project's environmental and social issues and of the World Bank's requirements in terms of environmental and social risks and impact management, including GBV/SEA/SH aspects | <ul style="list-style-type: none"> Internalization of all E&S instruments prepared in the framework of the project Environmental and social management procedure for sub-projects Reinforcement on the new environmental and social standards of the World Bank Concept of environmental monitoring |

| | | | | |
|-----------------------------------|--|---|--|---|
| National Environment Agency (NEA) | Application of Environmental Management Projects Act NEMA, 1994 and Regulations 2014) | Skills in environmental and social project management | Financial and logistical resources are relatively limited to allow them to properly monitor the implementation of project EIAs Administrative burden and weakness of the financing mechanism for inspection missions and environmental monitoring of projects Insufficient effective monitoring of ESMP implementation | Provide the NEA with financial and logistical resources to carry out its monitoring mission, Training on the environmental and social management procedure for sub-projects Strengthen the technical capacities of managers and field agents Capacity building needs for staff on the World Bank's new environmental and social standards and on monitoring and evaluation of project implementation. Support in intervention means |
| Gambian Tourism Board (GTB) | Promotion of The Gambia as a tourist destination Promotion of foreign and local investments in the tourism sector; - In addition, it works in cooperation with private partners to develop sustainable tourism products and services | Existence of qualified personnel who are familiar with the challenges of tourism activities | Lack of <i>resources for the management of environmental and social risks and impacts</i> Weak understanding of environmental and social issues and World Bank ESSs requirements | Need for capacity building in environmental and social protection, GBV management and sex tourism prevention |
| Gambia Hospitality Institute | Training in tourism related fields: cooking and baking, bar, and restaurant, housekeeping and laundry, | Training on ecological waste management Waste recovery Sensitivity on sustainability issues | Lack of <i>resources for the management of environmental and social risks and impacts</i> Lack of knowledge of World Bank ESSs requirements | Formulation of programs on environmental and social awareness Integration of module on ecotourism Training on Hygiene, Health and Safety measures in the work |

| | | | | |
|---|---|---|---|---|
| | reception and events and tour guide | | | environment; Training of residents on GBV/SEA/SH prevention and response |
| National Centre For Arts & Culture (NCAC) | Promotion and development of Gambian art and culture | Protection of the tourist heritage | Lack of resources for environmental and social; Lack of knowledge of World Bank environmental and social standards | Capacity building in environmental and social <i>risks management</i> Training on the ecological management of tourist heritage Training on GBV/SEA/SH |
| Minister of gender, children and social welfare | Protection of vulnerable social groups, including the elimination of all forms of discrimination against women | Has qualified executives and regional representations with a lot of experience in the field of tourism | Insufficient understanding of the project's environmental and social issues and the World Bank's requirements | Strengthen the institution's capacity to mitigate, prevent, respond to, and educate about the risks associated with sex tourism and/or sexual exploitation and abuse/sexual harassment (SEA/SH). Implementation and monitoring of the action plan on SEA/SH risk mitigation |
| Social Protection Department | Protection and promotion of the rights of vulnerable people such as children, women, and people with disabilities | Has qualified executives and regional representations with a lot of experience in the field of tourism | Insufficient understanding of the project's environmental and social issues and the World Bank's requirements | Awareness raising on GBV prevention and response, SEA/HS, etc. - Support and guide the complaint management process in relation to project activities; |
| NGOs and civil society | A large number of civil society associations cover the problems of environmental protection. These NGOs can provide advisory services and sensitization of the beneficiaries. | These actors, who have a local presence at the grassroots level, are key players that the project must consider as stakeholders for the success of its activities and share good practice in the management of GBV/SEA/SH/VAC | - Many of these NGOs are at a rudimentary stage of development, with limited technical and environmental capacity as well as financial/social human resources - Insufficient expertise in relation to environmental and social supervision | Training in environmental management, risk analysis and environmental issues Implementation and Monitoring of the Complaint Management Mechanism - Implementation and monitoring of the action plan on SEA/SH risk mitigation - Mastery of monitoring and evaluation tools for the implementation of infrastructure projects |

6.5.2 Capacity Building Plan

The inclusion of environmental and social aspects in the ESMF must be guaranteed in order to ensure that the sub-projects implemented under the project do not generate effects that could compromise all the expected benefits. To this end, it is relevant to put in place an effective system for managing the environmental and social aspects of the various microprojects that will be carried out by the communities. The project provides for a training program for actors involved in the environmental and social assessment of sub-projects.

6.5.2.1 Program objectives

The capacity building will aim at globally responding to the concern of developing the competences of the actors (Experts/Specialists of the project, Responsible of the supported breeders' organizations, works companies and sectoral Cadres of the concerned ministries and of the NEA, on the procedure of environmental evaluation of the sub-projects, on the identification of the risks and environmental social impacts, on the development of measures aiming at mitigating the negative impacts and on the evaluation of the performance of the component.

Specifically, it will improve/strengthen the capacities of the project partners and beneficiaries in terms of

- understanding the issues and challenges of environmental protection/management in general and those of the sub-projects to lay the foundations for sustainable management of natural resources
- Knowledge and understanding of the requirements of the World Bank's environmental and social standards, as well as the national legislative and regulatory framework in this area
- Operation of the ESMF, particularly the procedure for the socio-environmental review of sub-projects and the roles of environmental stakeholders
- Procedures and tools for screening investment sub-projects according to applicable environmental and social standards
- Socio-environmental monitoring of the implementation of mitigation measures for negative impacts of sub-projects
- Knowledge of the mechanisms and procedures for managing grievances at the central level and at the regional and local levels

document by the PIU.

6.5.2.2. Themes and modules for capacity building

The capacity building program for the various actors called upon to play a role in the socio-environmental process of the sub-projects is summarized in Table 16 below.

Table 16. Topics and training modules

| Training and awareness theme | Time and estimated duration of Training | Actors involved | Organizer | Budget (US \$) |
|---|---|-------------------------------------|---|----------------|
| Training on the World Bank's environmental and social standards <ul style="list-style-type: none"> - ESS 1: Assessment and management of environmental and social risks and impacts - ESS 2: Conditions of Work and Employment | During the first year of the Project implementation. Duration - 5 days | PIU Staff NEA TAC MC staff | Consultant World Bank specialists + 2 Support Consultants | 12500 |

| | | | | |
|---|--|--|------------|--------|
| <ul style="list-style-type: none"> - ESS 5: Land Acquisition, Land Use Restrictions and Involuntary Resettlement, and Gambian Regulations ESS3, ESS4 & ESS6 ESS8 and ESS10 - Content of the Environmental and Social Commitment Plan (ESCP) - Content of the Stakeholder Engagement Plan (SEP) | | | | |
| Environmental and Social Assessment <ul style="list-style-type: none"> - knowledge of the organization and management procedures for conducting ESIA's, - Policies, procedures, and legislation on social issues in The Gambia - Knowledge of the ESIA implementation monitoring process - risk assessment, effective management of risks and negative impacts, environmental and social monitoring, and reporting | Before the selection of sub-projects - Duration - 3 days | Technical Services PIU NEA TAC | PIU / WB | 7 000 |
| Awareness and advocacy on issues related to environmental and social aspects of the subprojects | Prior to the selection of subprojects - Duration - 2 day | Tourism actors, Local Authorities, Territorial Communities | PIU | 5 000 |
| Training on the environmental and social review and assessment procedure for subprojects <ul style="list-style-type: none"> - Environmental and social screening process - provisions for the application of effective management measures of environmental and social risks and impacts recommended during the implementation of the sub-projects | Prior to the selection of subprojects - Duration – 2 days | Regional Project Focal Points Local authorities | PIU | 5 000 |
| Training on environmental and social monitoring of sub-projects <ul style="list-style-type: none"> - Environmental and social monitoring methodology - Environmental and social monitoring/evaluation indicators - Compliance and enforcement of environmental laws and regulations - Raising awareness of the population on the protection and management of the environment - Reporting system | Six months before the start of civil engineering works 3 days | PIU Tourism actors, Local authorities | PIU NEA | 10 000 |

| | | | | |
|--|---|--|--------------------------|-------------------|
| Training in the implementation and monitoring of environmental and social measures | Three months before the start of civil engineering works-2 day | Companies (works manager, site manager) Design office for monitoring and control, Tourism actors, | Consultant NEA PIU | 5 000 |
| Training on coastal protection and biodiversity preservation | Six months after the reception of civil engineering works- 2 days | - Tourism stakeholders PIU - Technical staff of the ministries concerned | Consultant NEA PIU | 5 000 |
| Occupational Health and Safety Module: - Personal protective equipment - Workplace risk management, prevention of work-related accidents - Health and safety rules - Solid and liquid waste management - Emergency Preparedness and Response - Proper use of personal protective equipment Safety and security of the population with respect to refugees and host communities | Six months before the start of civil engineering works - 2 days | Companies (works manager, site manager) OE Hoteliers | Consultant PIU NEA | 5 000 |
| Module on GBV risk - Awareness, prevention and mitigation of GBV/SEA/SH risks - World Bank guidance - Survivor Support - Complaint Management | - to be delivered in a combined manner 3 day but also integrated into modules on social risks (in abbreviated form) | PIU Staff Regional Focal Points Companies (works manager, site manager) Monitoring and control engineering office | PIU NGO | 10 000 |
| Total capacity building program | | | | 57,000 USD |

6.6 Grievance Mechanism (GM)

6.6.1 Background to the Grievance Mechanism

Several types of conflicts are likely to arise during the implementation of the project. To prevent and achieve effective management of complaints and grievances related to the environmental and social management of the project, a mechanism will be put in place. This mechanism will mainly deal with complaints and grievances related to:

- access to or management of natural resources
- to the living environment

- land (physical and/or economic displacement)
- Gender-based violence (these complaints will be handled by different protocols that will be established and annexed to the GM document specifying how SEA/SH complaints will be handled in a confidential, ethical, and survivor-centered manner, including how data will be safeguarded to ensure that names of survivors or alleged perpetrators will not be shared)
- to jobs and income
- to pollution and nuisance
- the presence and operation of infrastructure
- lack of information or unclear information about the project
- exclusion of stakeholders to project benefits

To prevent the occurrence of conflicts and consequences related to these risks, the project has developed, among other things, this grievance mechanism, which provides the resources and organizational framework necessary for the registration and processing of grievances related to project activities, results, or impacts on the biophysical and human environments. It will handle complaints that relate to compliance with legal (grant agreements, contracts, etc.), fiduciary, technical, environmental, and social commitments to stakeholders and the public.

It should be noted that in the project's intervention zones, there is an "informal" conflict management mechanism in the villages. This mechanism is based on a "social" approach, i.e., bringing a complaint (examples include conflicts related to land, or conflict between two families of the communities related to land boundaries)) first to the traditional authorities (religious/ customary). If this approach is unsuccessful, the complaint can then be brought to the project GM or to "formal" conflict resolution bodies such as the administration (prefect, governor), the mayor's office or the courts (judge). Cases or incidents involving SEA/SH will not be addressed by community members or any informal mechanisms. Safe and accessible entry points will be selected during consultations with women, but their role will be limited to reception of SEA/SH complaints and referral to GBV services. In many cases, it may not be appropriate for community members to deal with grievances such as issues related to compensation levels, contractor not adhering to the ESMP (i.e., road safety, not following COVID-19 protocols, waste management, etc.) in which case PAPs may bring their grievance or concern to the project GM.

6.6.2 Objectives of the Grievance Mechanism (GM):

The GM's objectives are to:

- Record, categorize and prioritize the grievances according to severity and immediacy of the issue, and provide timely, fair, accountable resolution to grievances at the project level
- Ensure multiple and accessible channels for all stakeholders, especially those who are vulnerable or disadvantaged
- Settle the grievances via consultation with all stakeholders that are participatory and inclusive (and inform stakeholders of the solutions, obtain their views on the outcome, and ensure they understand possible next steps to escalate if they are not satisfied with the outcome)
- Prevent the risks and mitigate the impacts of SEA/SH by facilitating access to GBV services, raising awareness on SEA/SH amongst workers and community and enforce sanctions against perpetrators in line with the code of conduct of the project
- Forward any unresolved cases to the relevant authority
- Regularly analyze grievances to assess if there are systemic issues in the project that should be addressed to mitigate the same types of issues being reported

The GM operates within the existing legal, cultural and community context of The Gambia. It will also take into consideration World Bank procedures and recommendations regarding complaint handling

and monitoring and reporting on their resolution; as well as any other internationally recognized and applicable mechanism that contributes to resolve such specific cases.

6.6.3 Guiding Principles for the Grievance Mechanism

The following core principles will be observed to instill user confidence. Table 17 below defines the key fundamentals of the GM.

Table 17. Basic Principles of the GM

| Principles | Implementation measures | Indicators |
|----------------------------------|--|---|
| Security | <ul style="list-style-type: none"> - Protect the anonymity of complainants if necessary - Ensure confidentiality in the case of sensitive complaints - Limit the number of people with access to sensitive information | No retaliation for whistleblowing or bringing attention of issues to project personnel |
| Accessibility and context | <ul style="list-style-type: none"> - Disseminate the mechanism widely to the target groups, overcoming language, geographical, intellectual, financial, etc. barriers. - Clearly explain the procedures for filing a complaint - Diversify the opportunities for deposition of plains - Assist people with special access problems | <ul style="list-style-type: none"> - Variety of complaint sources - Rate of eligible complaints |
| Predictability | <ul style="list-style-type: none"> - Respond promptly to all complainants - Present a clear treatment process with deadlines for each step | <ul style="list-style-type: none"> - Average processing time - Response rate |
| Impartiality | <ul style="list-style-type: none"> - Ensure the impartiality of those involved in investigations - Ensure that no one with a vested interest in the outcome of the investigation is involved in the handling of the complaint | Removal of Complaint Management Team Members |
| Transparency | <ul style="list-style-type: none"> - To inform the parties concerned about the progress and results of the treatment | |

6.6.4 Structure of the GM

The GM shall consist of a three-tier system: **(i) local/community level; (ii) project level grievance resolution; and (iii) national legal level.** The general process is that a project affected person (PAP) should first raise a grievance at the local level. If it is not resolved at this level, it is referred to the Grievance Resolution Committee (GRC). If this proves unsuccessful in resolving the grievance, the complainant can proceed to the judicial/legal system as a last resort.

6.6.4.1 Local Level Grievance Resolution

Local communities have existing traditional and cultural grievance resolution mechanisms. It is expected that some disputes at the community level may be resolved using these mechanisms, without the involvement of the Project, contractor(s), and or Government representatives at local and national level. The extended family, village and/or chiefs may be involved at this level. All non-sensitive and minor complaints at the local level grievance mechanism is to be set up three months after Project effectiveness. More serious complaints including sensitive complaints (i.e., SEA/SH, violence against children, impropriety of project workers, corruption, incidents resulting in death) will be handled through a channel dedicated for such complaints. Other complaints such as breaches in community health and safety, resettlement issues, etc. will be managed by a higher-level process that includes a grievance resolution committee. In cases where the dispute relates to traditional and customary issues such as land ownership, inheritance, and land boundaries will be referred to the traditional dispute

resolution mechanism comprising the Village head and community leaders. The specific composition and other details will be spelt out before project implementation. If the complaint cannot be resolved at this level, the PAP will be advised to proceed to the next level, the Project-level Grievance Resolution Committee. To facilitate the reporting on sensitive complaints, including those related to SEA/SH, distinct entry points/contact persons/reporting channels will be selected at local level and confirmed as safe and confidential during the consultations with women and girls (in small groups led by a woman). All SEA/SH survivors reporting abuse via those channels will be oriented to the GBV service provider and the GBV Specialist of the project will be informed immediately to manage the complaint.

6.6.4.2 Project-level Grievance Resolution Committee (GRC)

- ❖ **The Grievance Resolution Committee** will be responsible for receiving and resolving complaints in a fair, objective, accountable, effectively, timely and accountable manner in all phases of the project lifecycle. It will deal with all grievances that have not been resolved at the local level.

The broad responsibilities of the GRC include:

- Developing and publicizing the grievance management procedures
- Receiving, reviewing, investigating, and keeping track of grievances
- Adjudicating grievances
- Monitoring and evaluating the fulfillment of agreements achieved through the grievance mechanism.

The GRC will normally include a representative from each of the following agencies: (i) the Ministry of Tourism and Culture; (ii) The Project Coordinator, PIU or his representative; (iii) an NGO working in the sector; (iv) the Area Council; a representative of PAPs, Representative of the Ministry of Lands and Regional Government (if the grievance is related to lands/resettlement); and the social development specialist in the PIU serving as the secretary to the Committee, a representative of NCAC (if the grievance is related to the World Heritage Site), and a representative from the Ministry of Gender, Children and Social Welfare. The GM will establish ethical, confidential, and survivor-centered procedures for managing sensitive complaints. All SEA/SH complaints will be provided with referral to GBV service providers (if not already offered at local level) and will be verified and addressed by a restrained group within the GRC led by GBV Specialist and consisting of persons with experience in working on GBV related issues.

- 6.6.4.3 **National legal level:** If the GRC does not provide a satisfactory resolution for the PAP, he or she will be advised to seek resolution of grievances through the judicial system as provided for in the Constitution 1997 and other relevant laws. Legal costs borne by the complainant will be his or her responsibility. In some cases (for example SEA/SH related complaint when survivors do not want to use judicial system) there is an option for the appeal to be filed to the Permanent Secretary, who will set up a committee, which includes Project Coordinator of the PIU, to review the case.

6.6.5 Grievance Mechanism Procedures for complaints unrelated to SEA/SH

The community will be informed and sensitized about the existence and use of the GM (through radio notices, community meetings, Imam and with some awareness trainings by the PIU prior to the starting of the resettlement process and of the various uptake options where complaints can be submitted). These uptake channels can include:

- Toll-free telephone hotline

- E-mail
- Letter to project focal points in the regions
- Complaint form to be lodged via any of the above channels
- Walk-ins may register a complaint on a grievance logbook at various easily accessible facilities.

The following procedures will be followed in treating complaints:

Step 1: Receipt and registration of complaints

The channels for receiving complaints will be diversified as indicated above. Oral complaints must be transcribed in writing before the rest of the process to ensure traceability (by the secretariat). Any complaint, whether verbal or written, is immediately recorded in a Grievance logbook attached as Annex 1. The complainant shall receive an acknowledgment of receipt within 48 hours of filing his/her complaint.

Step 2: Investigation of complaints

A sorting is carried out by the complaint handling bodies to distinguish between sensitive (i.e., SEA/SH/VAC) and non-sensitive complaints, considering the precise criteria retained by the Project Implementation Manual. Non-sensitive complaints will be dealt with by the GRC. Sensitive complaints, after registration by the GM Operator (for SEA/SH/sensitive complaints), are immediately transmitted to the special committee set up to address SEA/SH (see section 6.2.5 below). The time required to analyze a non-sensitive complaint shall not exceed seven (7) days after receipt of the complaint.

Step 3: Investigation to verify the merits of the complaint

At this stage, the information and evidence will be gathered to determine the validity or otherwise of the grievance and to provide solutions to the grievance raised. Specific expertise may be requested by the GRC if such expertise is not available from within the GRC. The maximum period for this phase is ten (10) working days. If further investigation is required, the complainant should be informed accordingly specifying the deadline when a reply will be provided.

Step 4: Response proposals

Based on the findings of the investigations, a written reply will be sent to the complainant highlighting the validity or otherwise of the claim. If valid, the complaint will be informed in writing and/or in the preferred format or method indicated by the complainant (email, letter, SMS, phone) the conclusions of the investigations, the solutions adopted, the means of implementing corrective measures, the schedule implementation and budget. If the complainant was made anonymously, the project will post the resolution on the project website under a specific section reserved for grievance resolution notices, and on Facebook. During stakeholder meetings about the grievance process, stakeholders will be told where to find information related to anonymous complaints and will be encouraged to visit the project website and follow the project’s Facebook page for regular updates. The proposed response is made within five (5) working days after the investigations. Similarly, if the complaint is found to be unjustified, a written notification will be sent in the same format to the complainant.

Step 5: Review of responses in case of non-resolution at first instance.

In the event of dissatisfaction, the complainant may contest the measures adopted. The complainant could request a review of the resolutions of the Grievance Resolution Committee. The period allowed for this is a maximum of fifteen (15) working days from the date of receipt of the notification of the decision to contest the decision by the complainant. In such circumstances, the Committee has ten (10) working days to review its decision and propose additional measures, if necessary, which the complainant should be notified in writing.

Step 6: Implement corrective measures

The implementation of the measures adopted by the grievance resolution committee cannot take place without the prior agreement of both parties, especially the complainant, to avoid all forms of dissatisfaction and abuse. The procedure for implementing the corrective action(s) start five (05) working days after the complainant acknowledges receipt of the letter notifying him of the solutions adopted and his agreement to the decision to the measures proposed.

Step 7: Judicial settlement

If all attempts at an amicable resolution are not acceptable to the complainant, the latter may resort to the judicial system. All measures must be taken to promote the amicable settlement of complaints (except for complaints relating to SEA/SH) through the mechanism set up for this purpose, but complainants are free to opt for a judicial procedure if they wish. Thus, complainants must be informed of their freedom to have recourse to the judicial system. Legal costs or costs related to legal recourse will be borne by the complainant.

Step 8: Completion or termination of the complaint

The procedure will be closed by the GRC if the outcome of the mediation is agreed by all parties involved, in which case the complainant is required to confirm agreement/satisfaction of the resolution in writing. The file is closed after five (05) working days from the date of implementation of the corrective decision, which will then be documented and carefully recorded for the project.

Step 9: Reporting

All complaints received will be recorded in the grievance logbook (Annex 4) for non-SEA/SH complaints and once resolved the resolution should be recorded within ten (10) working days whether the complainant accepts the resolution or not. This operation will make it possible to document the entire complaint management process and to draw the necessary lessons through a simple and adapted database designed for this purpose. The database will also flag the most frequently submitted issues and the places from where the most complaints originate or recurring topics and propose corrective measures to the project if they frequently occur. This will also be reported to communities during stakeholder meetings to demonstrate that corrective actions were taken to address systemic or recurring problems. During the mid-term survey/consultations, the project will also ask stakeholder about the effectiveness, accessibility, reliability, and responsiveness of the GM and seek feedback on recommended changes if any. Such changes will be communicated to stakeholders using the various methods (i.e., social media, community consultations, website, etc.).

Step 10: Archiving

The project will establish a physical and electronic filing system for filing complaints. Archiving will take place within five (05) working days of the end of the reporting. All the supporting documents for the meetings that will have been necessary to reach the resolution will be recorded in the complaint file. The archiving system will provide access to information on: i) complaints received; ii) solutions found; and iii) unresolved complaints requiring further action. The Grievance Logbook is provided and will be transferred to an excel spreadsheet and will also be retained in physical hardcopy (Annex 13).

6.6.6 Grievance Sensitive Complaints (involving SEA/SH and VAC)

For complaints regarding SEA/SH and VAC, the procedure of receiving and treating the complaint will be different from the procedure for general complaints outlined above. At all times, the approach for such issues will follow a survivor-centered approach, will ensure confidentiality, and take action only with survivor's informed consent. The security of the involved parties will not be breached. A mechanism in the form of **SEA/SH Compliance Team (SSCT)** will be set up to manage cases of SEA/SH

as well as issues related to violence against children (VAC). The membership of the SEA/SH Compliance Team will include:

- a. *A social or environmental safeguards officer (who will have capacity training by the GBV Specialist)*
- b. *The GBV Specialist*
- c. *The occupational health and safety manager from the contractor, or someone else tasked with the responsibility for addressing SEA/SH and VAC with the time and seniority to devote to the position, s/he will also be trained by the GBV Specialist*
- d. *A representative from a local service provider with experience in GBV and VAC (the 'Service Provider')*
- e. *A representative from the MOTC, that will be trained by the GBV Specialist*

These members will be specially trained on the management and review of SEA/SH complaints, the importance of a survivor-centered approach, as well as guiding principles for survivor care and management of SEA/SH data and claims. The GBV Specialist shall be the coordinator of the Team. If permitted by the survivor, a representative from a service provider should participate in the management committee to provide advocacy on behalf of the survivor and ensure that survivor care principles are respected throughout the process. Below are the procedures for managing the grievance mechanism for SEA/SH-related incidents.

Step 1: Uptake

A complainant who wishes to lodge an SEA/SH-related grievance may use any trusted channel made available to her or him by the project to file a complaint with the project GM. The project should identify secure, confidential, and accessible entry points through which survivors will feel safe and comfortable making reports (e.g., an anonymous complaint box, grievance form, telephone, service provider, community-based structure, or focal point, etc.). Complainants may also use contractor grievance processes to file SEA/SH claims, but once filed with the contractor, the claims should be referred for verification to the SEA/SH GM operator for the project who will be specifically tasked to handle sensitive complaints such as SEA/SH.

A complaint intake form should be completed by the appropriate actor after having obtained the survivor's written consent to proceed with the grievance. If the complainant has not yet been referred for services, the intake actor should confirm whether the survivor wishes to receive support, and if so, obtain the survivor's consent to be referred for appropriate care and connect the survivor with locally available providers or arrange for remote support where needed. Medical, psychosocial, and legal aid services should at least be made available, other services as well if possible (for example, socio-economic, security and legal.).

Where community-based uptake points are utilized, these actors must be trained on how to receive and refer SEA/SH cases in accordance with survivor care principles, how to apply active listening techniques, and how to complete and store intake forms safely and confidentially⁴⁹.

If the survivor chooses to be referred for services only and not to file a complaint, then the survivor's wishes must be respected; the service provider can then ask if the survivor consents to share basic case information to assist the project to track the cases that choose not to access the GM. The survivor

49 - It is recommended that the intake forms etc. are stored in a lockable space with limited access by GBV service providers or the GSVCT level to reduce the risks of breach of confidentiality and security.

always retains the right to be referred for services whether there is a link established between the project and the incident in question.

Any information collected about a survivor, or the alleged perpetrator must be recorded and maintained separately from other grievance documentation, in a secure and lockable space, with strictly limited access.

Step 2: Sort and process

Once the complaint has been formally received by the dedicated GM operator for processing sensitive complaints (position to be determined pending the PIU being set up), with informed survivor consent, the GM focal point (for the SEA/SH GM) should verify that the complainant has been offered the opportunity to receive services, and if not, ensure that the survivor is referred for necessary services upon obtaining the survivor's informed consent.

The complaint should then be triaged as a SEA/SH complaint and the coordinator for the verification structure notified that a SEA/SH complaint has been received and will need review. The GM focal point should also notify the appropriate PIU focal point (the GBV specialist), who in turn will inform the World Bank project lead, within a 24-hour period that a SEA/SH complaint has been received. The GM focal point need only share the nature of the case, the age and sex of the complainant (if known), whether there is a link with the project (if known), and whether the survivor has been referred for services. Absolutely no identifying information for the survivor or the alleged perpetrator may be shared with either the CPCU or World Bank focal points.

Step 3: Acknowledge receipt

The GM focal point should ensure that the complainant receives a document acknowledging formal receipt of the SEA/SH grievance within three days of the complaint being filed. Delivery of the acknowledgement to the complainant will depend upon how the complaint was initially received; if, ideally through a service provider, then all communication with the survivor can be done through the service provider.

Step 4: Verification process

The verification process for a SEA/SH grievance will be handled by the **SEA/SH Compliance Team (SSCT)** as described above. Once convened by the SSCT coordinator, the other members of the SSCT will review available information about the SEA/SH claim in question, the nature of the claim, and whether there is a link with the project. The SSCT will also make its recommendations to the alleged perpetrator's employer or manager as to appropriate disciplinary sanctions per the code of conduct, type of incident, and the appropriate labor laws and regulations. Before the recommendations are transmitted to the employer the SEA/SH survivors will be informed, by the GBV service provider, about the outcomes of verification process and the recommendations to the employer and potential sanctions to the alleged perpetrator so the survivors can confirm their consent to proceed and develop a security plan in case of retaliations. Potential disciplinary sanctions for alleged perpetrators can include, but are not limited to, informal or formal warnings, loss of salary, and suspension or termination of employment. The SSCT must complete the verification process and render its decision within 10 days of receipt of the complaint.

It should be noted that the objective of the verification process is to examine only whether there is a link between the project and the reported SEA/SH incident and to assure accountability by recommending appropriate disciplinary measures. The verification process establishes neither the innocence nor the guilt of the alleged perpetrator as only the judicial system has that capacity and responsibility (the survivors can, if they wish to, access the judicial system at any time including as last recourse). In addition, all final decisions regarding disciplinary actions will rest solely with the employer or manager of the alleged perpetrator; the SSCT can make only its recommendations.

Step 5: Monitor and evaluate

Monitoring of the SEA/SH complaints will be important to ensure that all complainants are offered appropriate service referrals, that informed consent is obtained in all cases for both filing and managing of grievances, and referrals to GBV services, and that all grievances are handled safely and confidentially, and in a timely manner. Any information shared by the GM operator with the PIU or World Bank will be limited as noted above under Step 2. The project GM operator should establish information-sharing protocols with GBV service providers in order to ensure safe and confidential sharing of case data as well as appropriate closures of SEA/SH cases.

Step 6: Feedback to involved parties

Once the verification process has been concluded and before any action is taken by employer of the alleged perpetrator, the result of the process shall be communicated first to the survivor within fourteen days, ideally through the service provider, to allow the survivor and relevant advocates the appropriate amount of time to ensure adequate safety planning as needed. Once the survivor has been informed, the alleged perpetrator can be informed of the result as well.

If either party disagrees with the result, s/he can appeal the SSCT decision via the GM appeals process and must file an appeal within fourteen days of receipt of the verification result. This appeal will be filed to the Permanent Secretary, who will set up a committee composing of Project Coordinator of the PIU to review the case.

6.6.7 COVID-19 Mitigation Plan

The World Bank has developed a good practice note for the projects it funds to comply with COVID-19 prevention measures. The project will comply with its guidelines as provided for in Annex 9.

6.6.8 Procedure to follow in case of archaeological remains discovery (Chance finds)

During civil works, Contractor shall take all necessary measures to respect the cultural and religious sites (cemeteries, sacred sites, worship areas, etc.) in the vicinity of the works and not to damage nor disturb them. For this purpose, it shall ascertain beforehand their type and location before starting the civil work.

If, during the course of the civil work, remains of cultural, historical or archaeological interest are discovered, Contractor shall follow the following procedure: (i) stop all works in the affected area; (ii) immediately notify the prime contractor who shall take steps to protect the site from destruction; a protective perimeter shall be identified and marked on the site and no activity shall take place within it; (iii) refrain from removing and relocating the objects and remains. Work must be suspended within the protective perimeter until the national agency responsible for historic and archaeological sites has given authorization to proceed. The Chance Finds Procedures is in Annex 10.

6.6.9 ESMF Implementation Environmental and social monitoring and evaluation measures

6.6.10 Environmental and social monitoring and evaluation

6.6.10.1 Environmental and social monitoring and evaluation objectives

The objective of environmental and social monitoring and evaluation is to ensure the effective implementation of measures to mitigate negative impacts and strengthen positive ones by monitoring and evaluating the pace of activities implementation during both the development and operation phases of the site. This monitoring and evaluation will ensure that the environmental and social

requirements and measures included in the contractual clauses (agreements, contracts, Tenders dossier, specifications, and general estimates) are properly applied by the beneficiaries and service providers.

Monitoring may allow, when required, to redirect the continuation of the civil work and possibly improve their overall progress.

6.6.10.2 Supervision

Environmental and social monitoring of the project will be carried out by the structure in charge of environmental and social assessments, namely the National Environment Agency (NEA), which will involve various other actors (decentralized services, communities, population, etc.). Thus, quarterly environmental, and social monitoring missions will be carried out by the regional branches of the NEA, and half-yearly missions by the national level. The environmental and social monitoring of the project activities will be the subject of an agreement to be signed with the NEA. The representatives of the Communities and the Tourism Actors will be able to participate in this monitoring

6.6.10.3 List of items requiring environmental and social monitoring and evaluation

Indicators are pre-identified signals that express changes in certain conditions or outcomes related to specific interventions. They are metrics that provide quantitative or qualitative information on the environmental and social impacts and benefits of the RPRTG. The indicators for monitoring the ESMF measures are summarized in Tables 18 and 19 below

Table 18. ESMF measures monitoring Indicators

| Measures | Areas of intervention | Indicators |
|---|--|---|
| Screening | Socio-environmental review | <ul style="list-style-type: none"> - Number of projects with environmental and social screening - Number of training sessions held |
| Technical measures (studies) | Carrying out ESIA ESMP for subprojects that require them | <ul style="list-style-type: none"> - Number of validated ESIA ESMP ToRs - Number of ESIA developed and approved - Number of ESMP developed and approved - Number of consultations held - Number of tender and execution files that have integrated environmental and social requirements |
| Project monitoring and evaluation measures | Internal follow-up by the E&S specialist | <ul style="list-style-type: none"> - Number and types of indicators monitored - Number of internal monitoring missions - Number of external monitoring missions - Follow-up reports |
| | External monitoring | <ul style="list-style-type: none"> - Number and types of indicators monitored - Number of internal monitoring missions - Number of external monitoring missions - Follow-up reports |
| Training/Awareness | Training on the defined socio-environmental themes | <ul style="list-style-type: none"> - Number and nature of modules developed - Number of sessions organized - Typology and number of participants trained per stakeholder group involved (disaggregated by sex) - Training reports |

Table 19. Environmental and Social Components Monitoring Indicators

| Environmental and human elements | Monitoring measures |
|---------------------------------------|--|
| Air | <ul style="list-style-type: none"> - Evaluation of the level of dust and other fine particles emission - Visual and technical control of smoke, gas, and dust emission levels |
| Soils | <ul style="list-style-type: none"> - Visual assessment of soil erosion control measures - Monitoring of waste practices - Monitoring of borrow pits areas reclamation practices - Monitoring of nuisance and pollution and various soil contaminations (pollutants, oils, greases, etc.) - Soil control at the base camp and related facilities |
| Fauna and flora | <ul style="list-style-type: none"> - Number of hectares reforested - Number of plants planted - Evaluation of reforestation/planting measures and regeneration rate - Control of the level of evolution (fixation, migration, appearance, disappearance) of the fauna and flora - Monitoring the level of implementation of the company's internal regulations on the protection of natural resources |
| Water | <ul style="list-style-type: none"> - Monitoring of wastewater discharge procedures and facilities - Monitoring of water resource use activities - Monitoring of erosion control measures - Water quality control (wells) |
| Occupational Health and safety | <ul style="list-style-type: none"> - Strict application of internal regulations on health, hygiene, and safety measures - Control of the availability of PPE and appropriate safety instructions - Control of compliance with risk, hazard, and accident prevention provisions - Monitoring of compliance with periodic medical examinations of employees - Control of the respect of the application of the labor legislation: supply and wearing of adequate protective equipment for the site personnel - Control of the installation of safety instructions and hygiene measures on construction sites, including measures against COVID-19 - Control of the level of awareness of the site personnel and the local population - Monitoring the effectiveness of outreach programs with local communities Monitoring of the effectiveness and efficiency of the recommended awareness measures - Number of locally recruited workers (disaggregated by sex) - Number of people (staff and workers) informed and sensitized (disaggregated by sex) about safety, health & security, and other E&S as well as SEA/SH mitigation measures - Posting of internal regulations signed by the Labor Inspectorate - Percentage of workers wearing PPE - Percentage of workers who have signed the Code of Conduct |

| Environmental and human elements | Monitoring measures |
|--|--|
| Sexual Exploitation and Abuse and Sexual Harassment | <ul style="list-style-type: none"> - Percentage of SEA/SH/VAC complaints registered by GM that were referred to GBV care services - Number of awareness sessions on GBV/SEA/SH/VAC <ul style="list-style-type: none"> - Number of organized training sessions for staff/workers on the Code of Conduct clearly prohibiting SEA/SH and listing sanctions - Number of staff/workers who attended a CoC training session - Percentage of all staff/workers who have signed the CoC - Number of small separate consultations with women and girls facilitated by a woman organized - Number of women that took part on consultations in small separate groups facilitated by a woman |
| Living environment | <ul style="list-style-type: none"> - Monitoring of waste collection and disposal practice - Control of spoil and other waste disposal sites at life bases and construction site - Control of noise emission thresholds; |
| Jobs and revenues | <ul style="list-style-type: none"> - Control of the hiring of workers in the riparian zones - Control of the level of development of economic activities in the area |
| Infrastructure | <ul style="list-style-type: none"> - Compensation, social support for those affected - Control of the effectiveness of compensation paid to the population for property losses - Surveys of administrative and local authorities on the relevance of awareness campaigns conducted among local populations - Control of the occupation of the Rights-of-Way of the works (fields, pastures, fallow lands, etc.) |
| Security in worksites | <ul style="list-style-type: none"> - Verification of the availability of safety instructions in case of an accident the existence of appropriate signage compliance with traffic regulations o compliance with the speed limit on the wearing of adequate protective equipment |
| Archaeological heritage and cultural | <ul style="list-style-type: none"> - Level of application of the "chance find" procedure - Quantity and nature of cultural property discovered - Number of alerts from cultural heritage services |

6.6.10.4 Monitoring costs

The summary of monitoring implementation costs is presented in Table 20 below.

Table 20: Cost of Project Environmental & Social Monitoring Program

| Activities | Periodicity | Cost |
|--|-------------|---|
| NEA Regional Services Monitoring Mission | Quarterly | Expenses related to the travel of agents in the field, including fuel: 200,000 D x 6 missions per year x 5 years = 6,000,000 D = \$110,000 USD |
| NEA National Monitoring Mission | Quarterly | Expenses related to the travel of agents in the field, including fuel: 200 000 x 3 missions/year x 5 years = 3,000 000 D \$55,000 |

| | | |
|---------------|-----------|--|
| Miscellaneous | Quarterly | Mission associated cost such as action or workshops 100,000 Dalasi x 3 missions/year x 5 years = 1,500,000 Dalasi = \$30,000 USD |
| Total | | 10,500 000 Dalasi \$ 195,000 USD |

6.6.11 ESMF Environmental and social monitoring

6.6.11.1 Objective of the Monitoring

Despite the knowledge of certain environmental and social phenomena related to the risks and generic impacts of the project activities, there is still a certain degree of uncertainty in the precision of other impacts, particularly regarding diffuse and residual impacts. For this reason, it is necessary to develop an environmental follow-up program. The latter must allow for the verification, in the field, of the accuracy of the evaluation of certain impacts and the effectiveness of certain planned measures, for which there is still uncertainty. The knowledge acquired through the environmental follow-up will make it possible to correct the measures and possibly revise certain environmental protection standards. The Follow-up Program describes: (i) the elements to be monitored; (ii) the monitoring methods/devices; (ii) the monitoring responsibilities; and (iv) the monitoring period.

6.6.11.2 Monitoring

The environmental monitoring of the project will be under the responsibility of the NEA, which will involve various other actors (decentralized services, communities, population, etc.). The agreement that will be signed with the NEA and the PIU will cover the environmental monitoring component.

6.6.11.3 Environmental and social indicators

Environmental and social monitoring will make it possible to follow the evolution of the state of the environment, particularly the sensitive elements, based on relevant indicators on the environmental components established on a consensual basis by the various stakeholders in its execution. The monitoring indicators as well as certain parameters will have to be re-specified and refined after the completion of the environmental and social studies to be carried out for the sub-projects subject to the project. In order to provide guidance on the environmental and social monitoring of the project, the following framework has been developed (see Table 21).

Table 21. Environmental and social monitoring framework for the project

| Environmental and social elements | Evaluation elements | Types of indicators and elements to collect | Periodicity |
|-----------------------------------|----------------------------------|--|-------------|
| Air | Air quality | - Natural presence of fine particles in the air - Incidence of air quality related illnesses | Semiannual |
| Soils | Physical properties | - Erosion/gravelling - Pollution/degradation - Soil compaction level | Annual |
| Fauna/Flora | Evolution of the fauna and flora | - Degradation rate - Reforestation rate - Rate of reforested area - Recovery rate - Degree of wildlife disturbance | Annual |

| Environmental and social elements | Evaluation elements | Types of indicators and elements to collect | Periodicity |
|--|---|--|-------------|
| Employment and income | Level of recruitment of employees in waterfront areas | <ul style="list-style-type: none"> - Existence of an employment contract for employees - Number of people recruited in the villages - Number of local companies that benefited from the contracts - Level of tax payments to municipalities - Number of local laborers by gender used for the work - Percentage of women hired by sub-project | Semi annual |
| Occupational Health and safety | Level of compliance with OHS | <ul style="list-style-type: none"> - Number of PPE distributed to workers - Number of traffic accidents - Number of construction site accidents recorded during the work - Number of complaints resolved compared to the number of complaints recorded during the work | Quarterly |
| Sexual exploitation and Abuse and Sexual Harassment | Level of compliance with SEA/SH Action Plan | <ul style="list-style-type: none"> - Number of training sessions for staff and workers on code of conduct (CoC) clearly prohibiting SEA/SH and listing sanctions - Percentage of all staff and workers who have signed the CoC - Percentage of SEA/SH complaints that had been referred to GBV service providers for assistance - Number of awareness raising sessions on SEA/SH organized - Number of women consulted in small safe and separate groups led by a woman facilitator | |

6.6.11.4 Monitoring & Evaluation

The monitoring and evaluation aim to (i) verify whether the objectives have been met, and (ii) draw operational lessons to modify future intervention strategies. The evaluation will be done at mid-term and at the end of the project by independent consultants. It will consider cumulative impacts.

6.6.11.5 Reporting

To better monitor the implementation of the ESMF, the following reporting system is proposed:

- Monthly implementation reports produced by the environmental and social specialists of the contractors to be submitted to the Owner's Engineer and will submit them to the PIU
- Monthly implementation monitoring reports to be produced by the Environmental and Social Specialists and submitted to the PIU Coordinator to submit to the World Bank and NEA as required
- Quarterly implementation monitoring reports produced by the Project's PIU safeguard experts that will be transmitted to the World Bank and the NEA.

7 SCHEDULE AND BUDGET FOR IMPLEMENTATION OF THE ESMF

7.1 ESMF implementation Schedule

The implementation and monitoring schedule for the environmental and social activities are presented in Table 22 below

Table 22 : ESMF Implementation Schedule

| Activities | Year 1 | | | | Year 2 | | | | Year 3 | | | | Year 4 | | | | Year5 | | | | Year 6 | | | |
|--|--------|--|----|----|--------|----|----|----|--------|----|----|----|--------|----|----|----|-------|----|----|----|--------|----|----|----|
| | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 |
| Institutional measures | | | | | | | | | | | | | | | | | | | | | | | | |
| 1. Recruitment of Environmental and Social Safeguards Specialists | | | | | | | | | | | | | | | | | | | | | | | | |
| 2. Elaboration and signature of the agreement with NEA (Environmental and social monitoring of the project implementation) | | Elaboration and signature of the agreement | | | | | | | | | | | | | | | | | | | | | | |
| | | National level mission | | | | | | | | | | | | | | | | | | | | | | |
| | | Regional level mission | | | | | | | | | | | | | | | | | | | | | | |
| Technical and follow-up measures | | | | | | | | | | | | | | | | | | | | | | | | |
| 1. ESMF National Outreach Workshop | | | | | | | | | | | | | | | | | | | | | | | | |
| 2. ESMF Regional Outreach Workshops | | | | | | | | | | | | | | | | | | | | | | | | |
| 3. Screening of sub-projects | | | | | | | | | | | | | | | | | | | | | | | | |
| 4. Completion and implementation of ESIA/ESMP including validation by NEA | | | | | | | | | | | | | | | | | | | | | | | | |
| 5. Ongoing monitoring of ESMP implementation by Environmental and Social Safeguards Specialists | | | | | | | | | | | | | | | | | | | | | | | | |
| 6. Annual environmental and social compliance audit | | | | | | | | | | | | | | | | | | | | | | | | |
| 7. ESMF Implementation Evaluation (mid-term and final) | | At mid-term | | | | | | | | | | | | | | | | | | | | | | |
| | | Final | | | | | | | | | | | | | | | | | | | | | | |
| Training/Awareness | | | | | | | | | | | | | | | | | | | | | | | | |
| 1. Training on the World Bank's environmental and social standards | | | | | | | | | | | | | | | | | | | | | | | | |
| 2. Biodiversity Management Plan | | | | | | | | | | | | | | | | | | | | | | | | |

| Activities | Year 1 | | | | Year 2 | | | | Year 3 | | | | Year 4 | | | | Year 5 | | | | Year 6 | | | |
|--|--------|----|----|----|--------|----|----|----|--------|----|----|----|--------|----|----|----|--------|----|----|----|--------|----|----|----|
| | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 | Q1 | Q2 | Q3 | Q4 |
| 3. Environmental and Social Assessment | | | | | | | | | | | | | | | | | | | | | | | | |
| 4. Awareness and advocacy on sub-projects environmental and social issues | | | | | | | | | | | | | | | | | | | | | | | | |
| 5. labor risks and sound labor management, the GM for labor. | | | | | | | | | | | | | | | | | | | | | | | | |
| 6. Training on sub-projects environmental and social review and assessment procedure | | | | | | | | | | | | | | | | | | | | | | | | |
| 7. Training on sub-projects environmental and social monitoring of | | | | | | | | | | | | | | | | | | | | | | | | |
| 8. Training in the implementation of environmental and social measures of physical achievements | | | | | | | | | | | | | | | | | | | | | | | | |
| 9. Cultural heritage, World Heritage Sites | | | | | | | | | | | | | | | | | | | | | | | | |
| 10. Occupational Health and Safety Module | | | | | | | | | | | | | | | | | | | | | | | | |
| 11. Module on GBV/SEA/VAC risk | | | | | | | | | | | | | | | | | | | | | | | | |
| Implementation of the Complaint Management Process Action Plan | | | | | | | | | | | | | | | | | | | | | | | | |
| 1. Training and installation of complaint management committees | | | | | | | | | | | | | | | | | | | | | | | | |
| 2. Organization of awareness campaigns and popularization of the MGP to stakeholders in the communes of intervention | | | | | | | | | | | | | | | | | | | | | | | | |
| 3. Support for the operation of local management committees | | | | | | | | | | | | | | | | | | | | | | | | |
| 4. Oversight and evaluation of the complaint management process | | | | | | | | | | | | | | | | | | | | | | | | |
| Land acquisition/purchase | | | | | | | | | | | | | | | | | | | | | | | | |
| 1. Provision for acquisition/purchase of land from local government recipients | | | | | | | | | | | | | | | | | | | | | | | | |
| 2. Economic and physical displacement and restricting access | | | | | | | | | | | | | | | | | | | | | | | | |

7.2 Estimated budget for ESMF implementation

The estimated budget for the ESMF implementation includes both Environmental and Social Monitoring Plan and Capacity Building plan plus additional costs related to the environmental and social assessment procedures of sub-projects. Thus, the estimated costs of environmental and social measures amount to **US\$ 1,046,000.00** as shown in Table 23 below.

Table 13: Estimated costs of the ESMF environmental and social measures

| Activities | Quantity | Unit cost | Total cost US\$ |
|---|----------|-----------|-------------------------------|
| Institutional measures | | | |
| 3. Recruitment of Specialists in Environmental and Social Safeguards, Gender and GBV, Stakeholder Consultation/Communication Consultant, and OHS consultant | | | Included in budget of project |
| 4. Monitoring of the implementation of the project's environmental and social instruments by NEA, as well as logistic and technical support | | | 50 000 |
| E&S measures | | | |
| 10. ESMF National Outreach Workshop | 01 | 01 | 5 000 |
| 11. ESMF Regional Outreach Workshop | 03 | 2 500 | 7,500 |
| 12. Screening of sub-projects | PM | PM | Included in budget of project |
| 13. Environmental and Social Monitoring Plan | | | 195,000 |
| 14. Completion and implementation of ESIA's and implementation of the ESMPs after validation by the NEA | 05 | 100 000 | 500 000 |
| 15. Ongoing monitoring of ESMP implementation by Environmental and Social Specialists | | | Included in budget of project |
| 16. Evaluation (mid-term and final) of the implementation of the ESMF | 02 | 50 000 | 100 000 |
| Training/Awareness | | | |
| 14. Module on SEA/SH/VAC risk for PIU staff, project workers and beneficiary communities | 02 | 5 000 | 10 000 |
| 15. Occupational Health and Safety Module for contracted and supply workers | 02 | 3 500 | 10 500 |
| 16. Training on the World Bank's environmental and social standards – for PIU staff and contractors and implementing partner agencies | 03 | 5 000 | 15 000 |
| 17. Capacity building for all stakeholders – PIU, implementing partners, contractors etc. | | | 57,000 |
| Implementation of the GM | | | |
| 19. Formation and installation of Grievance Resolution Committees | 1 | 5000 | 5000 |
| 20. Organization of awareness raising campaigns and popularization of the GM to stakeholders in the communes of intervention | 3 | 2500 | 7000 |
| 21. Support for the operation of local management committees | 2 | 2500 | 5000 |

| Activities | Quantity | Unit cost | Total cost US\$ |
|--|----------|---|---------------------|
| 22. Oversight and evaluation of the complaint management process | 1 | 4000 | 4000 |
| 23. Implementation of the SEA/SH Prevention and Response Action Plan (see Annex 4) | | | 75000 |
| TOTAL | | One million forty-six thousand USD | 1,046,000.00 |

CONCLUSION

The Ministry of Tourism and Culture prepared this ESMF for all project activities in all project areas in the country to ensure that project implementation is in full compliance with national environmental legislation and the World Bank's environmental and social framework (ESF).

Policy, legal, and institutional frameworks have been assessed; public consultation and participation meetings have been held; and the report provides potential environmental and social impacts and guidelines for mitigating them. It also provides the project's environmental and social management process as well as the implementation and monitoring procedures.

This ESMF includes a built-in grievance procedure to address grievances that may arise during project implementation.

Given the nature of the project, potential adverse impacts are expected to be moderate to substantial, small in scale, mostly site-specific and can be easily controlled by the proposed mitigation measures. The environmental and social impact assessment of the proposed sub-projects will be conducted and will propose site-specific measures to mitigate adverse impacts.

The successful implementation of this ESMF will depend largely on the involvement and participation of tourism stakeholders. Specifically, it is recommended that environmental and social awareness and education of key stakeholders and affected communities should be an integral part of project implementation.

From the discussions and personal interviews, it appears that most of the participants are fully committed to the objectives of the project. In this regard, the involvement of stakeholders in the design of the project concepts should enable them to take ownership of the project and ensure its sustainability.

Based on the above, the PIU will hire qualified and competent environmental and social specialists to assess and monitor the management of environmental and social risks and impacts during and after the project implementation phases and develop capacity throughout the project lifecycle.

ANNEXES

ANNEX 1. BIBLIOGRAPHY

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ANNEX 2. TERMS OF REFERENCE FOR ESMF

I. CONTEXT AND RATIONALE

Tourism is recognized as a key productive sector in the current National Development Plan of The Gambia, and it is one of the main contributors to both Gross Domestic Product and employment. The aim of the proposed project is to enhance the investment climate, competitiveness, and sustainability of selected tourism destinations to promote growth through private sector participation and job creation. This implies improving the sector's development framework, increasing the participation and value addition of tourism related Micro, Small and Medium Enterprises (MSMEs), and developing sector resilience with the restoration, upgrading, and preservation of critical tourism assets, as well as product diversification.

Developments in the Tourism Development Area in the Greater Banjul Area has contributed to domestic migration from poorer rural areas and foreign migration (mostly from nearby countries in West Africa) to Kotu and Kololi, and more recently Bijilo, and Brusubi (Kombo North) largely as a result of the proximity to the Atlantic Ocean and the possibility of accessing tourism-related employment opportunities. The Gambia is known as a popular and affordable tourist destination especially among European tourists, which are targeted by tourist operators, especially given its relative proximity. It is also known for sex tourism, in some cases, with tourists seeking relationships with Gambian men/women. Some workers in the hospitality sector (hotels, bars, restaurants, tour guides, etc.) are also vulnerable to sexual exploitation and abuse/sexual harassment (SEA/SH) in the workplace. While prostitution in The Gambia is illegal, it often takes place on the beach, in bars and hotels on the coast (primarily at the "Senegambia strip" and the coastal area around Kololi). In addition, the HIV infection rate among those involved in sex work is high. Female and same-sex sex workers are among the most vulnerable for the acquisition of both HIV and STIs, as well exposure to gender-based violence and impacts to reproductive, sexual, and mental health.

Specific activities related to destination development and improving MSME capabilities will be determined during project preparation or implementation. Potential sites under consideration include: Abuko Reserve (Western River), River Gambia National Park (Kiang West) and Bijilo National Park (West Coast). The rich coastal Bijilo Forest Park (or Monkey Park), a fenced woodland gazetted in 1952, covers an area of 51.3 ha south of the Senegambia area of Kololi. It consists mainly of closed canopy forest with a significant number of *Borassus aethiopum* palms. The Park opened to the public in 1991 with over 23,000 visitors per year. It lost part of its reserve status in 2018 during the construction of Sir Dawda Kairaba Jawara International Conference Center. It has diverse fauna of invertebrates, reptiles, and mammals, including green monkeys, Temminck's red colobus, Campbell's mona monkey and patas. Abuko National Park is located south of Abuko town, is a popular tourist attraction and was the country's first designated wildlife reserve. It has a wide variety of monkey species and other vertebrates and several types of rodents, including cane rats. Typical trees, up to 6.1m high, are: oil palm, mahogany, iroko and anthocleista procera.⁵⁰

River Gambia National Park, established in 1978, is in Niamina East district of Central River Division. The Park includes the 585 ha Baboon Islands is typical of a tropical rainforest in the form of a riparian forest. Unfortunately, the Gambia's coastal zone, consisting of 80 km of open ocean coast and 200km sheltered coast, is prone to flooding and erosion. With the Gambia River dividing the country into two banks, and tidally inundated swamps covering 20 percent of the country, the Gambia River ecosystem is at risk of

⁵⁰ An unarmed, evergreen tree growing 6 -20 meters tall.

permanent flooding by a sea level rise of 1m. The manifestation of climate change in the coastal areas includes coastal erosion and loss of or submerged beaches.

II. GENERAL PROJECT DESCRIPTION

2.1 Program Development Objectives: To support the development of a diversified and resilient tourism sector and increase financial inclusion in the Gambia.

PDO-level indicators proposed at project to monitor the key outcomes of the Project are:

1. Increased revenue from upgraded destinations
2. Increase in gross revenue of MSMEs and entrepreneurs (with share of women and youth)
3. Increase in value of mobilized private investment in the tourism sector

Intermediate indicators are:

1. Participatory Tourism Master Plan for alternative Tourism Development Area developed
2. Number of tourism sites upgraded
3. Number of tourism firms with increased access to credit
4. Number of firms with increased productivity

Project Components

The proposed Project will be executed in five years with the objective of strengthening sustainable tourism by developing a framework, supporting the enabling environment, building capacity, promoting access to finance for tourism related MSMEs and building resilience through risk management and strengthening sustainable coastal infrastructure. The proposed project aims to contribute to economic growth and employment generation by enhancing selected tourism destinations in The Gambia by improving the sector's development framework, increasing the participation and value addition of tourism related MSMEs, and developing sector resilience with the restoration, upgrading, and preservation of critical tourism assets as well as product diversification. In using an MFD approach to determine appropriate public and private roles, the project will help the long-term promotion of private sector participation, which will support the sector to scale up as per the future demands.

The proposed project would consist of five components:

Component 1: Support to the Tourism Enabling Environment

This component aims to boost sector competitiveness by improving the investment climate that supports tourism sector development. The subcomponents include:

i. Increasing and diversifying tourism demand through improved marketing, branding and air access

This subcomponent would target upgrading market intelligence systems on the Gambia Tourism Board to better leverage market intelligence to increase the understanding of demand trends, and promote the destination, diversifying towards new source markets and higher-value growth segments (e.g., birdwatching). This would include implementing marketing actions identified by the action plan and will synergize with both air access and destination development activities. The project will also support the

revision of regulatory elements pertaining to taxes and fees on aviation and provide recommendations to amend those that are contrary to ICAO policies. In addition, the project will support the capacity of the existing Gambia Air Access Committee to ensure a more strategic approach to airline engagement and to facilitate negotiations between airlines and destination stakeholders on route terms and incentives, based on the local context and current international best practices.

ii. Strengthening horizontal and vertical coordination in Tourism. This subcomponent will support the implementation of a whole-of-government-approach to tourism development that includes private sector stakeholders, ministries, government agencies, municipalities, and local communities. This will be done by expanding and institutionalizing the PPDM and improving capacity of key stakeholders with the objective of ensuring consensus and proper implementation of the National Tourism Policy and other upcoming sectoral guiding documents.

iii. Facilitating access to and usage of digital payments by enhancing the core infrastructure of the National Payments System (NPS), operated by the Central Bank. The objective of this subcomponent is to specifically make enhancements to the RTGS system and the core banking application, as well as upgrade the ACH with instant payment capabilities (i.e., software and hardware) and e-commerce gateway incorporation. The infrastructure enhancements/upgrades will be in the form of software and hardware investments. The aforementioned bottlenecks could be addressed to a large extent by modernizing the underlying payment systems that process digital payments initiated/received by end users in Gambia (as this subcomponent aims to do), so that: (i) faster processing of the payments and faster crediting of payee's accounts could be achieved; (ii) more players (banks and non-banks) could connect to the payment systems (potentially making use of open APIs), thus increasing competition, increasing the range of offerings and in particular of the digital payment instruments that merchants could accept (i.e. higher interoperability), and ultimately reducing processing cost; (iii) enabling more practical and lower cost digital payment acceptance infrastructure at merchant point of sale such as QR codes. Overall, such interventions will allow for faster, safer, and more affordable digital payment flows (on the initiation and receiving side) in Gambia, particularly for use cases such as payments in the tourism sector at the point of sale, as well as domestic and cross-border e-commerce.

Component 2: Improving MSME capabilities, linkages, and access to finance within the selected tourism destinations

This component aims to increase the participation and the value addition of tourism and tourism-related MSMEs within the selected tourist destinations. The objectives of this component are to: (i) nurture growth-oriented entrepreneurs/SMEs to increase productivity and innovation; (ii) create forward and backward market linkages; and (iii) create bankable SMEs and a deal flow of investment ready SMEs for both commercial financing and investment. This component will focus on providing support to tech startups and young growth-oriented SMEs in tourism sector. Under this component, activities, particularly those related to capacity building on sustainability and circular economy, will leverage the tools developed by the PROBLUE-funded ASA and consider climate-resilient design standards. In addition, there will be targeted interventions to reach women and youth, given that women-owned businesses are seen to face more constraints and that youth tend to be in a permanent cycle of unemployment and dangerous irregular migration due to lack of local job and business opportunities.

The subcomponents include:

i. Strengthening tourism-related MSMEs and entrepreneurship ecosystem. This would aim to enhance and expand the services of intermediary institutions that support operational sustainability, resilience, growth of startups and MSMEs. This component will target Intermediary institutions which can be public, private, and non-profit organizations that deliver services to actors of the entrepreneurial ecosystem such as technology centers, innovation centers, incubators, accelerators, business support organizations, tech hubs, technology commercialization offices, and industry associations. The component will i) identify, assess, and categorize intermediaries with the potential to significantly contribute to the shift in the firms' growth trajectories and ii) build organizational capabilities in developing their business models toward operational sustainability, expansion, and increased quality of services provided. It will finance competitively awarded results-based performance contracts to Intermediary Institutions. Through results-based performance contracts, Intermediary Institutions will provide business coaching to two sets of end clients: 'growth-oriented MSMEs' and "technology enabled startups", explained below.

- **Growth Oriented MSMEs in tourism:** The Intermediary Institutions selected by the project will take a Lead Firm approach to MSME solution, one that leverages large firms to expand the capacity of the MSMEs in their value chain or have the potential to be suppliers. Partnerships will be built with large firms in tourism sector like hotels, digital marketplace, tour operators that have proximity to market and are innovators in the sector, so knowledge/technology can be transferred to MSMEs that develop long-term relationships. The project will take a MFD cascade approach and will work with IFC's portfolio and pipeline clients in the tourism sector to bring in private investments. Intermediary Institutions will coach eligible MSMEs identified by large firms and other private sector sources by building their market readiness by improving technical and managerial capacity and help them gain buyers' confidence and thus lead to contractual agreement with identified local/regional/global institutional buyers. The coaching will focus on market linkages, technology adoption for online presence, climate resilience, finance facilitation, human resources management, accounting, legal, compliance, industry expertise, access to markets and networks etc.
- **Technology Enabled Startups:** Intermediary Institutions selected by the project will provide business coaching to technology enabled startups (at least two years in operation) focused on tourism tech, business function automation and climate smart technologies, and circular economy investments. The aim is to promote technology adoption in tourism related MSMEs and incentivize innovative approaches as well as to enhance efficiencies at various points in the tourism value chain.

ii. Expand tourism related MSMEs access to financing. This would reduce the COVID-19-heightened credit risks associated with the sector and its tourism-related MSMEs by freeing up financial sector's excess liquidity to support the pursuit of growth and diversification opportunities. This will be done by establishing a Partial Credit Risk Guarantee Fund (PCRGF) to provide access to finance to i) identified and categorized intermediaries and ii) the tourism related MSMEs and iii) technology enabled startups supported under subcomponent 2.i. The design of the scheme could include windows to create working capital products to meet the needs of the MSMEs of the tourism value chain. It could also include guarantee lines for very young businesses, technology adoption and/or other capital expenditures. By establishing a PCRGF, the operation will be mobilizing financing from commercial financial intermediaries in line with Private Capital Mobilization (PCM) objectives.

Component 3: Support the diversification and resilience of the tourism sector

This component aims to build on the Action plan developed through a public-private dialogue (PPD) mechanism and the prioritization process under The Gambia Integrated Urban and Coastal Resilience Program, to make the sector more resilient to growing climate risks while reducing high dependency on the current low value-addition single market/single product tourism approach.

i. Protection, rehabilitation, and integrated management of coastal areas. This will be guided by the assessment of the flood and coastal risks in the Greater Banjul Area and surrounding region, that identified key interventions that would reduce erosion and coastal risks. It will also support the rehabilitation of existing tourism assets (e.g., Kunta Kinteh Island). Finally, it will work with key stakeholders in civil society and the private and public sectors to increase awareness of climate risks, improve cleanliness and implement small works.

ii. Integrated Tourism Product Development and Diversification of selected TDA/tourism areas: It will aim to develop a non-sun and sea tourism area in a selected tourism destination. The interventions will be structured around development of new assets and upgrading existing assets to diversify the product and to increase tourist spending or value addition.

During the PPD meetings, potential attractions selected were Abuko Reserve (TDA3 – Western River), River Gambia National Park (TDA 7, Kiang West) and Bijilo National Park (TDA 1, Action Area 1, West Coast).

Through the development of a participatory Tourism Master Plan for selected area/s, the project will validate the top 2 –3 key ecotourism attractions, likely to include the Abuko Reserve, River Gambia National Park and Bijilo Forest Park based on, i) proof of tourist interest and revenue potential, ii) environmental and social sustainability, iii) limited upgrades required to existing infrastructure/access, iv) positive reviews on booking sites. For selected attractions, the necessary infrastructure investments for key upgrade will be identified, prioritized, and financed, backed by the business case to include returns on investment and social and environmental protection/sustainability plan.

The project will also assess the quality of road access to all identified priority tourism locations, evaluate upgrade requirements and prioritize upgrades based on, i) upgrades that are minor/short timeframe to address, ii) provides access to multiple communities or tourist sites, iii) access to sites with high volume potential, and iv) access to sites which provide income to vulnerable communities. The funding mechanisms will consider the potential for co-investment with the private sector and public sector.

Component 4. Monitoring and Evaluation and Project Management

This component covers the activities of the Project Management Unit (PMU) set up by the GoG during the project preparation phase. The PMU will be responsible for overall supervision, quality assurance and M&E, Coordination with other relevant Ministries as well as Coordination and implementation of policy and regulatory framework related issues. The operation level Project Implementation Unit (PIU) will be set up for the day-to-day operations of the project, facilitation, monitoring, fiduciary supervision, and safeguards management as well as for the institutional coordination among the various agencies involved with the project activities at national and local level. The staff of PMU/PIU should comprise of professional experts to be selected competitively on a merit-basis and be paid at market-rate, and if possible, on milestone basis. During preparation, Implementation Arrangement will be identified in consultation with the counterpart Ministry(ies).

Component 5. Contingent Emergency Response Component

The objective of the zero-cost component is to allow a rapid reallocation of credit proceeds from other components to provide emergency recovery and reconstruction support following an eligible crisis or emergency. The component would finance public and private sector expenditures on a positive list of goods or specific works, goods, services, and emergency operation costs required for Gambia's emergency recovery. A Contingent Emergency Response Implementation Plan will apply to this component that details financial management, procurement, safeguards, and any other necessary implementation arrangements.

2.5 Intervention zone of the Project

The project will intervene along the Atlantic Coast where most tourism activities are located, and some select tourism destinations upcountry. Specific activities related to destination development and improving MSME capabilities will be determined during project preparation or implementation. Potential sites under consideration include: Abuko Reserve (Western River), River Gambia National Park (Kiang West) and Bijilo National Park (West Coast).

2.4 Beneficiaries.

- 1) technical government agencies such as Gambia Tourism Board to better leverage market intelligence to increase the understanding of demand trends, and promote the destination, diversifying towards new source markets and higher-value growth segments (e.g., birdwatching, ecotourism, etc.).
- 2) MSMEs in the sector involved in accommodations, adventure and recreation, attractions, events and conferences, arts and crafts, tourism services, and travel trade that could benefit from partnerships with large firms like hotels, the digital marketplace, tour operators that have proximity to market and are innovators in the sector.
- 3) Women and youth who will be assisted to receive tourism skills training since especially women who are typically more present in food services and growth in the tourism sector and given that women-owned businesses are seen to face more constraints. The youth on the other hand tend to be in a permanent cycle of unemployment and vulnerable to dangerous irregular migration due to lack of local job and business opportunities. There are some women/girls and men who are vulnerable in this sector to issues related to sexual tourism and/or sexual exploitation and abuse/sexual harassment (SEA/SH). Women/youth in this sector would also benefit from measures to reduce these risks in this sector via this project.
- 4) Populations living and working along the coastal areas who will be protect against flooding and coastal erosion.

Scope of work of the consultancy

The development of the Environmental and Social Management Framework (ESMF) for The Gambia Tourism project is necessary for the compliance of the program with both national regulations on the environment and social requirements and with the Environmental and Social Standards of the World Bank.

To this end, the consultant responsible for carrying out the ESMF studies will work in close collaboration with the regulatory institutions in The Gambia on the basis of the national regulations and policies and the environmental and social standards of the World Bank, in particular:

- For the national part:
 - Constitution of the Republic of The Gambia, 1997
 - National Environment Management Act, 1994
 - Land Acquisition and Compensation Act, 1991
 - Physical Planning and Development Control Act, 1991
 - State Lands Act, 1991
 - State Lands Regulations, 1995
 - Environmental Impact Assessment Regulations 2014
 - The Women's Act 2014
 - National Development Plan (NDP-2018-2021)
 - Children's Act, 2005
 - Labor Act, 2007
 - Women's Act, 2010
 - Gambia Tourism Board Act, 2011
- For the World Bank: The 8 ESF Environmental and Social Standards relevant to the project
 - ESS1: Assessment and Management of Environmental and Social Risks and Impacts
 - ESS2: Labor and Working Conditions
 - ESS3: Resource Efficiency and Pollution Prevention and Management
 - ESS4: Community Health and Safety
 - ESS5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement
 - ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
 - ESS8: Cultural Heritage
 - ESS10: Stakeholder Engagement and Information Disclosure

The ESMF will identify the potential negative environmental and social risks and impacts, among which risks relating to vulnerable groups and individuals, the risk of expropriation or restriction of access to land, the risk of increased GBV/SEA/SH and social conflicts during the construction and development phases.

The main stakeholders in the project area will be consulted and in during the national validation workshop.

- 1) The ESMF is an instrument that examines risks and impacts when a project consists of a program, or a series of sub-projects and the risks and impacts cannot be determined until the details of the program or sub-project components have been determined. The ESMF sets out the principles, rules, guidelines, and procedures for assessing environmental and social risks and impacts. It contains measures and plans to reduce, mitigate and/or compensate for risks and adverse impacts, provisions for estimating and budgeting the costs of these measures, and information on the agency or agencies responsible for managing project risks and impacts, including its ability to manage environmental and social risks and impacts. It includes adequate information on the area in which the sub-projects are expected to be located, including the potential environmental and

social vulnerabilities of the area, as well as the potential impacts that may occur and the mitigation measures that could be put in place.

- 2) The ESMF will carry out an environmental and social assessment of the project in order to assess the environmental and social risks and impacts of the project throughout its life cycle. The assessment will be proportionate to the potential risks and impacts of the project and will assess, in an integrated manner, all relevant direct, indirect, and cumulative environmental and social risks and impacts throughout the life cycle of the project, including those specifically identified in the ESF Environmental and Social Standards (ESS) 2-10.
- 3) The ESMF will be based on current information, including an accurate description and delineation of the project and any related aspects, as well as on sufficient detailed environmental and social baseline data to allow the characterization and determination of risks and impacts and mitigation measures. The ESMF will assess the potential environmental and social risks and impacts of the project; examine alternative solutions; identify ways to improve the selection, location, planning, design and implementation of projects to apply the hierarchy of measures to mitigate adverse environmental and social impacts and seek opportunities for improving the positive impacts of the project. The ESMF will include stakeholder participation as an integral part of the assessment, in line with ESS 10.
- 4) The ESMF will be an adequate, accurate and objective assessment and presentation of known risks and impacts, prepared by qualified and experienced persons.
- 5) The Government of the Gambia will ensure that the ESMF appropriately addresses all matters relating to the Project, including:
 - A strategy for implementing the Project in the context of COVID-19, taking into account the recommendations of the World Health Organization (WHO) but also the regulations of the Gambian Government concerning measures to stem the spread of the disease.
 - The country's applicable policy framework, national laws and regulations and institutional capacity (including enforcement) on environmental and social issues; variations in country conditions and project context; national environmental or social studies; national environmental or social action plans; the country's obligations directly applicable to the project under relevant international treaties and agreements
 - Applicable requirements under the ESS; and Environmental, Hygiene, Health and Safety (EHSS) guidelines and other Good International Industry Practices (GIIP)⁵¹
- 6) The ESMF will establish and apply a mitigation hierarchy that:
 - i. Anticipate and avoid risks and impacts
 - ii. Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels

⁵¹ Good Industry Practice International (GIIP) is defined as the exercise of professional skill, diligence, prudence and foresight which can reasonably be expected from qualified and experienced professionals engaged in the same type of undertaking in the same or similar circumstances globally or regionally. The result of such an exercise should be that the project uses the most appropriate technologies in the specific circumstances of the project.

- iii. Once risks and impacts have been minimized or reduced⁵², mitigate the risks and impacts
 - iv. Where significant residual impacts remain, or offset them, where technically and financially feasible.⁵³
- 7) The ESMF, informed by the scoping of issues, will consider all relevant environmental and social risks, and impacts of the project, including:
- i. **Environmental risks and impacts, including:** (i) those defined by the EHSS; (ii) those related to community safety; (iii) those relating to climate change and other transboundary or global risks and impacts; (iv) any significant threat to the protection, conservation, maintenance and restoration of natural habitats and biodiversity; and (v) those relating to the services provided by ecosystems and the use of biological natural resources, such as fisheries and forests.
 - ii. **Social risks and impacts, including:** (i) threats to human security through escalation of personal, community or interstate conflict, crime or violence⁵⁴ (b) Social risks and impacts, including: (i) threats to human security due to the escalation of personal, communal or interstate conflict, crime or violence (consider also security risks in the country, including those related to potential conflict and list potential conflicts, state the reasons and include conflicts currently active and where; does the project area intersect with conflict areas where security forces are present; (ii) the risks that project impacts will significantly affect disproportionately individuals and groups who, because of their particular circumstances, may be disadvantaged or vulnerable to including a gender analysis;⁵⁵ (iii) any prejudice or discrimination against individuals or groups in providing access to project resources and benefits, including those who may be disadvantaged or vulnerable; (iv) negative economic and social impacts related to involuntary land grabbing or land use restrictions; (v) risks or impacts associated with land tenure and the use of land and natural resources,⁵⁶ including (if applicable) the potential impacts of the project on local land tenure patterns and arrangements, land access and availability , food security and land values, and any

⁵² The obligation to mitigate impacts may include measures to assist project-affected parties to improve or at least restore their livelihoods, as appropriate, in the context of a particular project.

⁵³ The Borrower will make reasonable efforts to incorporate the costs of offsetting and/or offsetting significant residual impacts into project costs. The environmental and social assessment will consider the significance of these residual impacts, their long-term effects on the environment and those affected by the project, and the extent to which they are deemed reasonable in the context of the project. Where it is determined that it is not technically or financially feasible to offset or offset such residual impacts, the rationale for this determination (including options that have been considered) will be set out in the environmental and social assessment.

⁵⁴ These include mainly gender-based violence and sexual exploitation and abuse.

⁵⁵ Disadvantaged or vulnerable people are those who are more likely to be adversely affected by the impacts of the project or whose ability to realize the benefits of a project is more limited than others. Such an individual or group is also more likely to be excluded or unable to participate fully in the general consultation process and, as such, may need specific measures and/or assistance to do so. This will take into account age considerations, including the elderly and minors, including where they may be separated from family, community or others on whom they depend.

⁵⁶ Due to the complexity of land issues in many contexts and the importance of tenure security to livelihoods, careful assessment and design is required to ensure that projects do not inadvertently compromise legitimate rights. rights (including collective rights, subsidiary rights, and women's rights) or have other unintended consequences, especially where the project supports land titling and related issues. In such circumstances, the Borrower will demonstrate, at a minimum, to the satisfaction of the Bank, that applicable laws and procedures, as well as project design features (a) provide clear and adequate rules for the recognition of relevant tenure rights; b) establish fair criteria and functional, transparent and participatory processes for resolving competing land disputes; and (c) make genuine efforts to inform data subjects of their rights and provide access to impartial advice

- corresponding risk related to conflicts or disputes over the latter; (vi) consequences for the health, safety and welfare of workers and communities affected by the projects; (vii) risks to cultural heritage, (viii) risks of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH).
- iii. There will also be a mapping and diagnosis of medical care services and legal, security and psychosocial assistance for survivors of Sexual Exploitation and Abuse and Sexual Harassment using the tool developed by the World Bank team on GEMS/Kobo Toolbox.
 - iv. A SEA/SH and VAC risk mitigation and response action plan should be included in line with the recommendations outlined in the Good Practices Note for Substantial Risk Projects (see Table 2, pages 27-36 of the Note on Good Practices)⁵⁷.
 - v. The characteristics and identification of the different communities living in and around the tourism areas, their means of existence will be included.
- 8) Where the ESMF identifies specific individuals or groups as disadvantaged or vulnerable, the differentiated measures will be proposed and implemented so that adverse impacts do not fall disproportionately on disadvantaged or vulnerable people and that 'they are not disadvantaged in sharing the development benefits and opportunities resulting from the project (e.g. young people, elders, women, people with disabilities, illiterates, landless people, etc.).
 - 9) The ESMF will also consider the risks and impacts associated with major suppliers,⁵⁸ as required by ESSs 2 and 6. The Borrower will address these risks and impacts in a manner commensurate with the control or influence of the Borrower on its main suppliers, as indicated in ESS 2 and ESS 6.
 - 10) The ESMF will take into account potentially significant transboundary and global risks and impacts related to the project, such as effluent and emissions impacts, increased use or contamination of international waterways, greenhouse gas emissions short-lived and long-lived, climate change mitigation, adaptation and resilience issues, and impacts on threatened or declining migratory species and their habitats.
 - 11) During consultations, a protocol explaining how stakeholders will be consulted while respecting social distancing measures and other recommendations from WHO and the Gambian Government.
 - 12) The ESMF will describe the risks related to the implementation of project activities during the pandemic (COVID-19) and others.

Stakeholder engagement and information disclosure

⁵⁷ <https://thedocs.worldbank.org/en/doc/fc074f5b6cc1621dc65675bf83c9d0b8-0290032021/original/ESF-Labor-Influx-Good-Practice-Note.pdf>

⁵⁸ Primary suppliers are those suppliers who, on an ongoing basis, directly supply the project with goods or materials essential to the essential functions of the project. The essential functions of a project constitute the production and/or service processes essential to a specific project activity without which the project cannot continue. This includes all greenhouse gases (GHG) and "black carbon" (BC).

- 13) As indicated in ESS 10, the Borrower will continue to engage with stakeholders and provide them with sufficient information throughout the life of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project.
- 14) For high risk and substantial risk projects, the Borrower will provide to the Bank and disclose documentation, as agreed with the Bank, relating to the environmental and social risks and impacts of the project prior to project appraisal. The documentation will adequately address the main risks and impacts of the project and provide sufficient detail to inform stakeholder engagement and Bank decision-making. The Borrower will provide to the Bank and disclose the final or updated documentation as specified in the ESCP.
- 15) If there are significant changes to the project that result in additional risks and impacts, particularly where they will affect parties affected by the project, the Borrower will provide information on such risks and impacts and consult with affected parties by the project as to how these risks and impacts will be mitigated. The borrower will disclose an updated ESCP, outlining the mitigation measures.

Key principles and tasks under the ESMF

- 1) The ESMF will specifically provide the following:
 - Explicit procedures and methodological approaches for the consideration of environmental and social aspects, standard mitigation measures and the tools necessary to identify impacts and mitigation measures.
 - The roles and responsibilities of the different structures involved in the implementation and monitoring of the project.
 - The needs for training, capacity building and other technical assistance needs necessary for the implementation of the ESMF.
 - An estimate of the budget needed to carry out the activities of the ESMF (which will subsequently be included in the project budget and related investments).
- 2) The project's Environmental and Social Management Framework (ESMF) must also comply with the country's environmental legislation.
- 3) Due to the potential negative impacts of certain project activities, these safeguards, in addition to providing an understanding of positive impacts, provide an operational framework for the identification, analysis of negative impacts and appropriate mitigation measures in relation to them, avoiding or eliminating negative environmental and social impacts or reducing them to an acceptable level.
- 4) **The main tasks and the associated deliverables:**
 - Describe the biophysical environment and the environmental and social situation including a gender analysis and a presentation of policies relating to GBV/SEA/SH and gender (especially as it relates to the tourism sector) in The Gambia and in the area of intervention of the Project, which represent the basis of the Project.
 - Describe and provide baseline data for the social environment

- The political, legal, and institutional framework for environmental management and impact assessment related to the nature of the project.
- The Gambia's procedures for environmental and social assessment
- Institutional arrangements for taking into account environmental and social aspects in the implementation of sub-projects/activities at the community level.
- Include differentiated mitigation and social inclusion measures for vulnerable/disadvantaged groups and individuals (including women, people with disabilities, youth, illiterate people, etc.) for project benefits, GM, ESCP (and ensuring accessible disclosure)
- include the assessment of the risks of Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and the risks for children, work practices, in particular those who are in vulnerable situations
- ensure that the stakeholder engagement plan includes disadvantaged/vulnerable groups and individuals
- incorporate, where appropriate, traditional forms of GM, but also ensure accessibility/inclusion of disadvantaged and marginalized people and groups, including women and girls.
- consider access to land/natural resources, in particular for its potential to exacerbate tensions, deepen poverty and inequality (particularly among women, certain forms of subsistence such as pastoralism)
- incorporate culturally appropriate measures when assessing the risks and impacts and benefits of the project, particularly in relation to livelihoods, vulnerable people, and groups (include impacts on local cultures, languages, and customs)
- Identify, assess, and measure the extent of positive and negative impacts and direct and indirect environmental risks in the areas of project intervention.
- consider social fragility/conflict risks, including poverty as a factor of fragility, inter-community dynamics between differences in access to services (water, food, land), differences in land and resource use, livelihoods, unemployment, etc.
- Provide a checklist of types of impacts and corrective actions to avoid and/or mitigate them. The consultant will present, in the annexes, a table containing the types of impacts and the appropriate mitigation measures and the social issues/risks prevalent in the tourism sector. They must also propose, as far as possible, actions aimed at improving the environmental and social conditions in the areas of intervention of the project
- Develop a framework for participatory program monitoring and evaluation to ensure effective and efficient implementation of the environmental and social issues highlighted in the ESMF
- Describe the mechanism and institutional arrangements for the implementation of the ESMF and the preparation of ESIA/ESMPs, specifying the roles and responsibilities of agencies and all actors (central, regional/local, municipal and village) involved in the Implementation.
- Assess the capacities of implementing government and local agencies involved in the implementation of the ESMF and raising awareness on environmental and social issues of the project and propose appropriate measures for awareness raising, institutional strengthening and/or capacity building. technical capacities of the different actors.
- Develop a public consultation and participation program involving all project stakeholders, including primary beneficiaries and those directly affected by the project, including women, youth, and vulnerable groups. A separate stakeholder engagement plan must be prepared (see Annex D) and it must be summarized in the annex to the ESMF.
- Develop a monitoring and evaluation mechanism to ensure systematic and effective monitoring of the main recommendations of the ESMF.

- Develop a detailed standard term of reference for impact analysis to support the preparation of ideas for new investment projects and related technical analyses/studies.

OUTLINE OF THE ESMF REPORT:

Overview of the ESMF

- 1) Executive summary
- 2) Legal and institutional framework
 - a. Analysis of the legal and institutional framework of the project, in which the environmental and social assessment takes place
 - b. Comparison of the existing environmental and social framework of the borrower and the SSEs and identification of gaps between them
 - c. Identification and assessment of the environmental and social needs of potential co-financiers.
- 3) Description of the project
 - a. A concise description of the proposed project and its geographic, environmental, social, and temporal context, including any off-site investments that may be required (e.g., dedicated pipelines, access roads, power supply, water supply, housing and storage facilities for raw materials and products), as well as the main suppliers of the project.
 - b. Country context
 - i. Environmental and social situation in the project area in the country including an analysis of the gender situation
 - ii. Political, administrative, and legal framework
 - iii. Country Environmental Impact Assessment Approval Mechanism
 - iv. Institutional capacity assessment
- 4) Explanation of the need for any environmental and social plan to meet the requirements of ESS 1 to 10 including measures addressing risks of SEA/SH as part of the SEA/SH Action Plan to be annexed to ESMF (see Annex 6 for more information).
- 5) A sufficiently detailed map, showing the location of the project and the area that could be affected by the direct, indirect, and cumulative effects of the project.

Reference data

- a) Explanation and, where possible, provision of basic social and environmental data relevant to decisions regarding project location, design, operation, or mitigation measures. This should include a discussion of data accuracy, reliability, and sources, as well as information on dates surrounding project identification, planning and implementation.
- b) Identification and estimation of the extent and quality of available data, major data gaps and uncertainties associated with predictions.
- c) Based on current information, an assessment of the scope of the area to be surveyed and a description of the relevant physical, biological, and socio-economic conditions, including any anticipated changes prior to the start of the project.
- d) Baseline data should consider current and proposed development activities in the project area, but which are not directly related to the project.

5. Environmental and social risks and impacts

- a) Assessment of all environmental and social risks and impacts of the project, including those set out in ESS 2 to 8, as well as all other environmental and social risks and impacts arising from the specific nature and context of the project (see summary of risks above).
- b) Include a description of GBV/SEA/SH (including child marriage and cultural practices such as female genital mutilation), forced labor and child labor risks (in national context and sections on the risks)⁵⁹.

6. Mitigation measures

- a) Identification of mitigation measures and significant residual negative impacts that cannot be mitigated and, to the extent possible, assessment of the acceptability of these residual negative impacts.
- b) Identification of differentiated measures to avoid adverse effects being felt disproportionately on disadvantaged or vulnerable people, including persons with disabilities, women, elderly, informal workers, fishers, and other vulnerable groups in the tourism sector.
- c) Assessment of the environmental and social impact mitigation feasibility, capital and recurrent costs of proposed mitigation measures, and their suitability under local conditions, as well as institutional, training and monitoring for proposed mitigation measures.
- d) Identification of specific measures to prevent and response to the risks of SEA/SH that could be exacerbated or created by project activities, both in the workplace as well as neighboring communities.
- e) Identification of specific issues that do not require further attention, what provides the basis for this determination.

7. Analysis of alternatives

- a) Systematic comparison of feasible alternatives to the site, technology, design, and operation of the proposed project – including the “without project” situation – according to their potential environmental and social impacts.
- b) Assessment of the feasibility of alternatives in terms of mitigating environmental and social impacts.
- c) For each of the alternatives, quantification of environmental and social impacts to the extent possible and explanation of economic values, to the extent possible.

8. Design measures

- a) Explanation of the basis for selection of the particular design of the proposed project and specifies the applicable EHSSs or if the EHSSs are deemed inapplicable, justifies the emission levels and recommended pollution prevention and abatement approaches that are GIIP compliant.
- b) The explanation of the selection of the particular design of the proposed projects should also take into account the relevant social risks and impacts.

9. Institutional arrangements for the implementation and monitoring of the ESMF, including institutional capacity assessment

⁵⁹ Existing data sources like Demographic Health Study etc. and secondary interviews with service providers and other stakeholders should be prioritized to gather this information. Consultations with women (in small separate groups facilitated by a woman) are encouraged to gather their perception about the risks related to GBV and SEA/SH but those should never include questions about individual experience of violence. The facilitator of such consultation should be able to offer referral to GBV services should anyone disclose experience of violence.

10. Capacity building and training

- a) Precise description of the institutional arrangements, identifying the party responsible for implementing the mitigation and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, corrective actions, funding, reporting and staff training).
- b) Recommendations regarding the establishment or expansion of responsible parties, staff training and any additional measures that may be necessary to support the implementation of the mitigation measures and any other recommendations of the ESMF.

11. Monitoring

The monitoring section of the ESMF should provide: a) a precise description and technical details of the monitoring measures, including the parameters to be measured, the methods to be used, the sampling locations, the frequency of measurements, the detection limits (if applicable) and the definition of thresholds that will signal the need for corrective action; and b) monitoring and reporting procedures to: (i) ensure early detection of conditions that require particular mitigation measures and (ii) provide information on the progress and results of the mitigation measures.

12. Public consultation and Grievance Mechanism

a) Briefly summarize the results of the consultations, including the focus group discussions. In a table in the annex, indicate the dates and lists of participants and summarize the main questions, concerns, and results of the public consultations (and, subject to community agreement, a few photos of the consultation, except those involving children and women only focus groups). Ensure methodologies allow for women to be consulted in separate groups (with only women facilitated by a woman).

b) Grievance Mechanism: include a description of how the Borrower will propose and implement a grievance mechanism (GM) to address these concerns and receive complaints, including SEA/SH complaints, and facilitate their resolution. This description would be derived from the Stakeholder Engagement Plan (SEP) and recognize that management of SEA/SH complaint should: i) include distinct channels for receiving, documenting and responding to complaints related to SEA/SH with multiple accessible and safe entry point identified through consultations with women and girls; ii) link all survivors disclosing incidents to medical, psychosocial, and legal GBV services through referral protocols; iii) include procedures for managing complaints that prioritize survivors' confidentiality, safety, dignity and informed consent, in line with a survivor-centered approach, iv) include procedures on how to handle and store confidential records. The ESMF will clearly define roles, responsibilities and accountabilities and designate the persons who will be responsible for implementing and monitoring stakeholder engagement activities and ensuring compliance with national laws and regulations, as well as the requirements of the World Bank ESF.

13. Implementation schedule and cost estimate

- a) For the three aspects (mitigation, monitoring and capacity building), the ESMF should provide, to the extent possible, an implementation schedule of the measures to be implemented within the framework of the project, indicating the phasing and coordination with overall project implementation plans
- b) Estimates of capital and recurrent costs and sources of funding to implement the ESMF and possible ESIA/ESMP. These figures are also included in the tables of total project costs.

14. Appendices

- Complete the environmental and social review form (screening)
- Standard terms of reference for strategic, regional or sector impact analysis to support the preparation of ideas for new investment projects and related technical analyses/studies
- List of ESMF consultations, including locations and dates and a summary of public consultations, with a list of participants, questions asked and answers
- List of people met
- Summary of Stakeholder Engagement Plan (include measures how vulnerable persons will be able to participate in stakeholder meetings, including persons with disabilities and other vulnerable groups).
- SEA/SH Action Plan with key drivers of the risks, measures to prevent and respond to them, timeline, budget, indicators to measure progress and responsible for implementation and monitoring.
- Examples of code of conduct with clauses prohibiting the use of SEA/SH and list of sanctions, aligned with national legislation, in case of misconduct.
- Grievance Monitoring Log for non-SEA/SH complaints (to be provided by World Bank)

ANNEX 3: Code of conduct with procedures for implementation of Environmental and Social, Health and Safety and Occupational Health and Safety standards and the prevention of Sexual Exploitation and Abuse, Sexual Harassment and Violence Against Children.

General

The purpose of these *Codes of Conduct and procedures for the implementation of Environmental and Social, Health and Safety (ESHS) and Occupational Health and Safety (HST) standards and the prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), Violence Against Children (VAC)* consists of introducing a set of key definitions, codes of conduct and guidelines in order to:

- i. Clearly define the obligations of all project personnel (including contractors and day laborers) regarding the implementation of environmental, social, health and safety (ESHS) and health and safety standards at the work (HST); and
- ii. Contribute to preventing, identifying, and combating SEA/SH and VAC on the site and in surrounding communities by outlining what protocols and mechanisms will the project put in place to address risks of SEA/SH and VAC and how it will address any SEA/SH and VAC allegations that may arise.

The application of these Codes of Conduct will ensure that the project achieves its objectives in terms of ESHS and HST standards, as well as preventing and/or mitigating the risks of SEA/SH and VAC on the site of the project and in local communities.

People working in the project must adopt these Codes of Conduct which aim to:

- i. Sensitize the staff operating in the project to the expectations in terms of ESHS and HST; and
- ii. Create awareness about SEA/SH and VAC, and:
 - at) Create a consensus on the fact that such acts have no place in the project; and
 - b) Establish a protocol for identifying SEA/SH and VAC incidents; respond to such incidents; and punish them.

The purpose of Codes of Conduct is to ensure that all project personnel understand the moral values of the project, the conduct that all employees are expected to follow, and the consequences of violating these values. This understanding will contribute to a smoother, more respectful, and more productive project implementation, to ensure that the project objectives are achieved.

2. Definitions

In these Codes of Conduct, the following terms will be defined below: **Environmental, Social, Health and Safety (ESHS) Standards:** a general term covering matters relating to the impact of the project on the environment, communities, and workers.

Occupational Health and Safety (OHS): Occupational Health and Safety aims to protect the safety, health and well-being of those who work or are employed on the project. Compliance with these standards at the highest level is a basic human right that should be guaranteed to every worker.

Gender-Based Violence (GBV): A general term for any harmful act perpetrated against a person's will and based on the socially attributed (i.e., gender) differences between men and women. They include acts inflicting physical, sexual, or mental suffering, or threats of such acts; coercion; and other acts of deprivation of liberty. These acts can take place in public or in private. The term GBV is used to highlight the systemic inequality between men and women (which exists in all societies around the world) and which characterizes most forms of violence perpetrated against women and girls. The 1993 United Nations Declaration on the Elimination of Violence against Women defines violence against women as "any act of violence directed against the female sex which causes or is likely to cause women harm or physical, sexual or psychological suffering". The main types of GBV are⁶⁰ :

- **Rape:** non-consensual penetration (however slight) of the vagina, anus or mouth with a penis, other body part or an object.
- **Sexual Assault:** any form of non-consensual sexual contact even if it does not result in penetration. For example, attempted rape, as well as unwanted kisses, fondling, or touching the genitals and buttocks. Other sexual assault types are:
 - **Sexual exploitation:** Taking or attempting to take advantage of a state of vulnerability, unequal power, or trust for sexual purposes, including but not limited to gaining pecuniary benefit, social or political (UN Glossary on Sexual Exploitation and Abuse, 2017, p.6).
 - **Sexual abuse:** Any physical intrusion of a sexual nature committed by force, coercion or in favor of an unequal relationship, or the threat of such intrusion (UN Glossary on Sexual Exploitation and Abuse, 2017, p.5).
 - **Sexual harassment:** sexual advances, requests for sexual favors and any other verbal or physical behavior of a sexual nature. Sexual harassment is not always explicit or obvious, it can include implicit and subtle acts, but it always involves power and gender dynamics in which a person in power uses their position to harass another based on their gender. Sexual behavior is undesirable when the person experiencing it deems it undesirable (e.g., looking up and down at someone, kissing or making sexual innuendoes by making noises; brushing against someone; whistling and making calls, giving personal gifts).
 - **Sexual favors:** a form of sexual harassment that includes making promises of favorable treatment (e.g., promotion) or threats of unfavorable treatment (e.g., loss of employment) based on sexual acts, or other forms of humiliating, degrading or exploitative behavior.
- **Physical assault:** an act of physical violence that is not sexual in nature. Examples: hitting, slapping, choking, hurting, shoving, burning, shooting, or using a weapon, attacking with acid or any other act that causes pain, physical discomfort, or injury.
- **Forced marriage:** the marriage of an individual against their will.
- **Denial of resources, opportunities, or services:** deprivation of legitimate access to economic resources/assets or means of subsistence, education, health, or other social services (e.g., a deprived widow an inheritance; income taken away by an intimate partner or a member of his family; a woman prevented from using contraceptives; a girl prevented from attending school, etc.)
- **Psychological/emotional abuse:** the infliction of mental or emotional pain or harm. Examples: threats of physical or sexual violence, intimidation, humiliation, forced isolation, harassment,

⁶⁰ Adapted from 6 types of GBV defined by Gender Based Violence Information Management System-
<http://gbvims.com/wp/wp-content/uploads/Annex-B-Classification-Tool.pdf>

stalking, unwanted solicitation, unwanted and/or threatening written remarks, gestures or words of a sexual nature, destruction of expensive objects, etc.

Child abuse (VAC): physical, sexual, emotional and/or psychological harm, neglect, or negligent treatment of minor children (i.e., under the age of 18), including the fact that a child is exposed to such harm to a third party, which results in actual or potential harm to their health, survival, development, or dignity, in the context of a relationship of responsibility, trust or power. This includes the use of children for profit, labor, sexual gratification or any other personal or financial advantage. It also includes other activities like using computers, cell phones, video devices, digital cameras, or any other means to exploit or harass children or to access child pornography.

Malicious solicitation of children: these are behaviors that allow an aggressor to gain the trust of a child for sexual purposes. This is how an offender may establish a relationship of trust with the child and then seek to sexualize that relationship (for example, by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

Malicious solicitation of children on the Internet: is the sending of electronic messages with indecent content to a recipient whom the sender believes to be a minor, with the intention of inducing the recipient to engage in or submit to sexual activity, including understood but not necessarily the sender.

Accountability Measures and Confidentiality: Measures instituted to ensure the confidentiality of survivors and to hold contractors, consultants, and the client accountable for establishing a fair system for handling GBV cases and VAC.

Contractor's Environmental and Social Management Plan (E-ESMP) : the plan prepared by the Contractor that describes how it will carry out the activities of the works in accordance with the project's Environmental and Social Management Plan (ESMP).

Child: term used interchangeably with the term "minor" which means a person under the age of 18. This is in accordance with Article 1 of the United Nations Convention on the Rights of the Child.

Child protection: activity or initiative aimed at protecting children from all forms of harm, in particular arising from VAC.

Consent: is the informed choice underlying a person's intention, acceptance, or free and voluntary agreement. There can be no consent where such acceptance or agreement is obtained by threat, force or other forms of coercion, kidnapping, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if the national legislation of the country where the Code of Conduct is introduced considers sexual majority at a younger age. Lack of knowledge of the child's age and the latter's consent cannot be invoked as a means of defense.

Consultant: any firm, company, organization, or other institution that has been awarded a contract to provide consultancy services in connection with the project and has hired managers and/or employees to carry out this work.

Contractor: any business, corporation, organization, or other institution that has been awarded a contract to provide construction services for the project and has hired managers and/or employees to perform that work. This includes subcontractors hired to perform activities on behalf of the contractor.

Employee: any person who provides labor to the Contractor or Consultant in-country, on-site or off-site, under a contract or labor agreement for a salary, performed formally or informally (including unpaid interns and volunteers), without responsibility for managing or supervising other employees.

SEA/SH and VAC Incident Allegation Procedure: prescribed procedure for reporting SEA/SH or VAC incidents.

SEA/SH and VAC Code of Conduct: Code of conduct adopted for the project covering corporate commitment and accountability of managers and individuals regarding SEA/SH and VAC.

GBV and VAC Compliance Team (CT): A team set up by the project to deal with SEA/SH and VAC issues.

Grievance Mechanism (GM): The process established by a project to receive and handle complaints.

Manager: any person offering labor to a contractor or consultant, on site or off, under a formal or informal contract of employment and in exchange for a salary, with the responsibility for controlling or directing the activities of a contractor or consultant's team, unit, division or similar and with responsibility for supervising and managing a predefined number of employees.

Perpetrator: the person(s) who commits or threatens to commit an act or acts of SEA/SH or VAC.

Intervention protocol: mechanisms put in place to intervene in cases of SEA/SH and VAC (see Section 4.7 Intervention protocol).

Survivor(s): the person(s) adversely affected by SEA/SH or VAC. Women, men and children can be survivors of SEA/SH; only children can be survivors of VAC.

Site: the place where the infrastructure development work under the project takes place. Consultancy assignments are considered to have as their site the places where they take place.

Site environment: the "project area of influence" which is any place, urban or rural, directly affected by the project, including human settlements.

3. Codes of Conduct

This chapter presents three Codes of Conduct to use:

- i. **Company Code of Conduct:** Commits the company to addressing SEA/SH and VAC issues
- ii. **Manager's Code of Conduct:** Commits managers to implement the Company's Code of Conduct, including those that are signed by individuals; and
- iii. **Individual Code of Conduct:** Code of conduct for everyone working on the project, including managers.

Company Code of Conduct

Prevention of Sexual Exploitation and Abuse, Sexual Harassment and violence against children

The company is committed to ensuring that the project is implemented in a way that minimizes any negative impact on the local environment, communities, and its workers. To do this, the company will comply with Environmental, Social, Health and Safety (ESHS) standards and ensure that the appropriate Occupational Health and Safety (HST) standards are met. The company is also committed to creating and maintaining an environment in which Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Violence Against Children (VAC) do not take place – they will not be tolerated by any employee, contractor, supplier, associate, or representative of the Company.

Therefore, to ensure that everyone involved in the project is aware of this commitment, the company is committed to the following fundamental principles and minimum standards of behavior, which will apply without exception to all employees, associates, and company representatives, including contractors and suppliers:

General

1. The company - and therefore all employees, associates, representatives, contractors, and suppliers - agrees to comply with all relevant national laws, rules, and regulations.
2. The company undertakes to fully implement its “Entrepreneurs' Environmental and Social Management Plan” (E-PGES).
3. The company is committed to treating women, children (persons under the age of 18) and men with respect, regardless of their race, color, language, religion, political or other opinion, national, ethnic, or social origin, level of wealth, disability, citizenship, or other status. Acts of Sexual Exploitation and Abuse/Sexual Harassment and VAC constitute a breach of this commitment.
4. The company ensures that interactions with members of the local community take place with respect and in the absence of discrimination.
5. Language and behavior that is demeaning, threatening, harassing, abusive, culturally, or sexually inappropriate, or provocative is prohibited among all Company employees, associates, and representatives, including contractors and suppliers.
6. The company will follow all reasonable work instructions (including those relating to environmental and social standards).
7. The company will protect the assets and ensure their proper use (for example, prohibit theft, negligence, or waste).

Health and Safety

8. The company will ensure that the project's Occupational Health and Safety (OHS) management plan is effectively implemented by company personnel, as well as contractors and suppliers.
9. The company will ensure that all persons on the job site wear the appropriate Personal Protective Equipment (PPE) as prescribed, to prevent avoidable accidents and to report conditions or practices that pose a safety risk or threaten the environment.
10. The company :
 - i. Prohibit the consumption of alcohol during work
 - ii. Prohibit the use of narcotics or other substances that may impair faculties at any time

11. The company will ensure that adequate sanitary facilities are available for workers on site and in all project worker accommodation.

Sexual Exploitation and Abuse, Sexual Harassment and violence against children

12. The actions of SEA/SH and VAC constitute serious misconduct and may therefore result in sanctions, including penalties and/or dismissal, and, if appropriate, referral to the police for further action.
13. All forms of SEA/SH and VAC, including the solicitation of children, are unacceptable, whether they take place in the workplace, in the vicinity of the workplace, in work camps or in the local community.
 - i. Sexual harassment - for example, making unwanted sexual advances, asking for sexual favors, or engaging in verbal or physical behavior that has a sexual connotation, including subtle acts, is prohibited.
 - ii. Sexual favors — for example, it is prohibited to promise or perform favors conditioned on sexual acts, or other forms of humiliating, degrading or exploitative behavior.
14. Any sexual contact or activity with children under the age of 18, including through digital media, is prohibited. Lack of knowledge of the child's age cannot be invoked as a defense. Nor can the child's consent constitute a defense or an excuse.
15. Unless there is full consent without reservation⁶¹ from all parties involved in the sexual act, sexual interactions between Company employees (at any level) and members of the surrounding communities are prohibited. This includes relationships involving the withholding/promising of a benefit (monetary or non-monetary) to members of the community in exchange for sexual activity – such sexual activity is considered as sexual exploitation and “non-consensual” under this Code.
16. In addition to the sanctions applied by the company, legal proceedings against the authors of acts of the SEA/SH or VAC will be initiated, if necessary.
17. All employees, including volunteers and contractors, are strongly encouraged to report suspected or actual acts of SEA/SH and/or VAC committed by a colleague, whether at the same company or not. Reports must be submitted in accordance with the project's SEA/SH and VAC Allegation Procedures.
18. Managers are required to report suspected or actual acts of SEA/SH and/or VAC and act accordingly, as they are responsible for upholding company commitments and holding their direct reports accountable for such actions. acts.

Implementation

To ensure that the principles set out above are effectively implemented, the company undertakes to ensure that:

19. All managers sign the project's “Managers' Code of Conduct”, which details their responsibilities, including implementing company commitments and enforcing the obligations of the “Individual Code of Conduct”.

⁶¹ Full consent without reservations in the context of economic and social power differences between the company employees and the community members might be very hard to prove therefor company employees at any level are strongly discourage of initiating any sexual interactions with community members.

20. All employees sign the project's "Individual Code of Conduct" confirming their commitment to comply with ESHS and HST standards, and not to engage in activities resulting in SEA/SH or VAC.
21. Company and individual Codes of Conduct should be prominently displayed in work camps, offices and in public areas of the workspace. Examples of these spaces are the waiting, rest and reception areas of the sites, the canteens, and the health centers.
22. Posted and distributed copies of the Company Code of Conduct and the Individual Code of Conduct must be translated into the appropriate language used in the worksite areas as well as the native language of any international personnel.
23. A designated person should be appointed as the company's " Focal Point " for handling SEA/SH and VAC matters, including representing the company on the Compliance Team (CT) against SEA/SH and the VACs, which is composed of representatives of the client, the contractor(s), the supervision consultant, and the local service provider(s).
24. In consultation with the Compliance Team (CT), an effective Action Plan should be developed, which should include at least the following provisions:
 - i. SEA/SH and VAC Incident **Allegation Procedure** for reporting SEA/SH and VAC incidents through the Complaints Mechanism;
 - ii. **Accountability and confidentiality measures** to protect the privacy of all involved ; and
 - iii. The **Response Protocol** for survivors and perpetrators of SEA/SH and VAC.
25. The company shall effectively implement the final agreed Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Prevention and Response Action Plan, making informs the Compliance Team (CT) of possible improvements and updates, if necessary.
26. All employees must complete an orientation course before commencing work on site to ensure they are aware of the company's commitments to ESHS and HST standards, as well as Codes of Conduct on site and its Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Violence Against Children (VAC) measures.
27. All employees must attend a mandatory training course once a month for the duration of the contract, starting with an initial training at the time of entry into service before the start of work, to reinforce the understanding of ESHS and HST standards as well as the SEA/SH and VAC measures and Code of Conduct.

I hereby acknowledge having read the above Company Code of Conduct and agree on behalf of the company, to abide by the standards contained therein. I understand my role and responsibilities to support the Occupational Health and Safety (OHS) standards and the Environmental, Social, Health (ESH) and Safety (ESHS) standards of the project, and to prevent and combat acts of SEA/SH and VAC. I understand that any action inconsistent with this Code of Business Conduct or failure to act in accordance with this Code of Business Conduct may result in disciplinary action.

Company Name: _____

Signature: _____

Name in full: _____

Title: _____

Date: _____

Manager's code of conduct

Implementation of ESHS and HST standards Prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (HS) and Violence Against Children (VAC)

Managers at all levels should uphold the company's commitment to implement Environmental, Social, Health and Safety (ESHS) standards and Health and Safety requirements in the workplace. Work (HST), as well as to prevent and deal with SEA/SH and VAC. This means that managers have a heavy responsibility to create and maintain an environment that meets these standards and helps prevent SEA/SH and VAC. They must support and promote the implementation of the Company's Code of Conduct. To this end, they must comply with the Manager's Code of Conduct and sign the Individual Code of Conduct. In doing so, they undertake to support the implementation of the Contractors Environmental and Social Management Plan (E-ESMP) and the Occupational Health and Safety (HST) Standards Management Plan, as well as to develop systems that facilitate the implementation of the SEA/SH and VAC Action Plan. They must ensure a safe workplace as well as a SEA/SH and VAC free environment both in the workplace and in local communities. These responsibilities include, but are not limited to:

Implementation

1. Ensure maximum effectiveness of the Company Code of Conduct and the Individual Code of Conduct:
 - i. Visibly display the Company Code of Conduct and Individual Code of Conduct by prominently displaying them in work camps, offices, and public areas of the workplace. Examples of areas include venue waiting, rest and reception areas, canteens, and healthcare facilities;
 - ii. Ensure that all posted and distributed copies of the Company Code of Conduct and Individual Code of Conduct are translated into the appropriate language that is used in the workplace as well as the native language of any international employee.
2. Explain orally and in writing the Company Code of Conduct and the Individual Code of Conduct to all staff.
3. Ensure that:
 - i. All direct reports sign the "Individual Code of Conduct", confirming that they have read and agree to it;
 - ii. Staff rosters and signed copies of the Individual Code of Conduct are provided to the OHS manager, the Compliance Team (CT) and the client;
 - iii. Participate in training and ensure that staff also participate, as detailed below;
 - iv. Establish a mechanism for staff to:
 - a) Report concerns regarding compliance with ESHS standards or HST standards requirements; and
 - b) Confidentially report incidents of SEA/SH or VAC through the Complaints and Grievances Mechanism
 - v. Staff members are encouraged to report suspected and proven issues related to ESHS standards and HST requirements, SEA/SH, or VAC, emphasizing the responsibility of staff to the company and country where they work and respecting the principle of confidentiality.

4. In accordance with applicable laws and to the best of your ability, prevent perpetrators of sexual exploitation and abuse from being hired, rehired, or deployed. Check the backgrounds and criminal records of all employees.
5. Ensure that when entering partnership, subcontracting, supplier or similar agreements, these agreements:
 - i. Include in appendices the codes of conduct on ESHS standards, HST requirements, SEA/SH, and VAC;
 - ii. Incorporate appropriate language requiring such contracting entities and individuals under contract, as well as their employees and volunteers, to comply with the Individual Code of Conduct;
 - iii. Expressly state that the failure of such entities or individuals, as the case may be, to ensure compliance with ESHS standards and HST requirements ; to take preventive measures to combat SEA/SH and VAC ; to investigate related allegations or take corrective action when acts of SEA/SH and VAC are committed – all of this is not only grounds for sanctions and penalties under individual Codes of Conduct, but also grounds for termination project work or service agreements.
6. Provide support and resources to the Compliance Team (CT) on SEA/SH and VAC to create and disseminate internal awareness initiatives through the outreach strategy under the SEA/SH Action Plan against SEA/SH and VAC.
7. Ensure that any SEA/SH or VAC issues warranting police action are immediately reported to law enforcement⁶², the client and the World Bank.
8. Report any suspected or proven acts of SEA/SH and/or VAC and respond in accordance with the Response Protocol , as managers have the responsibility to uphold the commitments of the company and to hold their subordinates directly responsible for their actions.
9. Ensure that any major incidents related to ESHS standards or HST requirements are reported immediately to the client and the supervising engineer.

Training

10. Managers are responsible for:
 - i. Ensure that the OHS Standards Management Plan is implemented, accompanied by adequate training for all staff, including contractors and suppliers;
 - ii. Ensure that staff have an adequate understanding of the E-ESMP and receive the necessary training to implement its requirements.
11. All managers are required to complete a Manager Induction course before commencing work on site to ensure they are aware of their roles and responsibilities with respect to compliance with both SEA/SH and VAC aspects of these Codes of Conduct. This training will be separate from the pre-service training required of all employees and will provide managers with the proper understanding and technical support needed to begin developing the Action Plan to address issues related to SEA/SH and VAC.
12. Managers are required to attend and contribute to the monthly training courses facilitated by the project and delivered to all employees. They will be required to present training and self-assessments, including encouraging the compilation of satisfaction surveys to assess satisfaction with the training and to provide advice on how to improve its effectiveness.

⁶² Unless there is a mandatory reporting on GBV and VAC in the national legislations any legal action and reporting to the police or authorities should be done only with informed consent of the survivor.

13. Ensure that there is scheduled time available during working hours for staff to attend the project's mandatory induction training on the following topics:
 - i. HST requirements and ESHS standards; and
 - ii. SEA/SH and VAC; this training is required of all employees.
14. During civil works, ensure that personnel undergo continuous training on HTS requirements and ESHS standards, as well as the mandatory monthly refresher course required of all employees to deal with the increased risk of SEA/SH and of VAC.

Response

15. Managers will need to take appropriate action to respond to any incident related to ESHS standards or HST requirements.
16. Regarding SEA/SH and VAC:
 - i. Contribute to the Procedures relating to allegations of SEA/SH and VAC and the Response Protocol developed by the Compliance Team (CT) in the framework of the final SEA/SH Action Plan approved;
 - ii. Once adopted by the company, managers will need to apply the Accountability and Confidentiality measures set out in the SEA/SH Action Plan, in order to maintain confidentiality about the identity of employees who report or (allegedly) commit acts of SEA/SH and VAC (unless a breach of confidentiality is necessary to protect persons or property from serious harm or if required by law requires);
 - iii. If a manager has any concerns or suspicions about any form of SEA/SH or VAC committed by one of their direct reports or by an employee working for another contractor in the same workplace, they are required to report the case by referring to complaints' mechanisms;
 - iv. Once a sanction has been determined, the managers concerned are supposed to be personally responsible for ensuring that the measure is effectively applied, within a maximum period of 14 days following the date on which the sanction decision was issued;
 - v. If a manager has a conflict of interest due to personal or family relationships with the survivor and/or abuser, they must inform the company concerned and the Compliance Team (CT). The company will be required to appoint another manager who has no conflict of interest to handle complaints;
 - vi. Ensure that any SEA/SH or VAC-related issues warranting police action are immediately reported to law enforcement⁶³, the client, and the World Bank.
17. Managers who do not address incidents related to ESHS standards or HST requirements, or who fail to report incidents related to SEA/SH and VAC or who do not comply with the provisions relating to SEA/SH and VAC, may be subject to disciplinary action, which will be determined and issued by the CEO, Managing Director, or equivalent senior manager of the company. These measures may include:
 - i. The informal warning
 - ii. The formal warning
 - iii. Additional training
 - iv. The loss of a maximum of one week's salary

⁶³ Unless there is a mandatory reporting on GBV and VAC in the national legislations any legal action and reporting to the police or authorities should be done only with informed consent of the survivor.

- v. Suspension of the employment relationship (without pay), for a minimum period of one month and a maximum period of six months
- vi. The dismissal.

18. Finally, the failure of managers or the CEO of the company to respond effectively to cases of violence related to Environmental and Social, Hygiene and Health (ESHS) and Occupational Hygiene and Health standards (HST) and responding to Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Violence Against Children (VAC) in the workplace, may result in legal action before national authorities.

I hereby acknowledge that I have read the Manager Code of Conduct above, agree to abide by the standards therein, and understand my roles and responsibilities in preventing and responding to ESHS-related requirements, to HST, SEA/SH and VAC. I understand that any action inconsistent with the Manager's Code of Conduct or failure to act in accordance with this Manager's Code of Conduct may result in disciplinary action.

Signature: _____

Name in full: _____

Title: _____

Date: _____

Individual code of conduct

Implementation of ESHS standards and HST requirements

Prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (HS) and Violence Against Children (VAC)

I, _____, acknowledge the importance of complying with Environmental, Social, Health (ESH) and Safety (ESHS) standards, to comply with the project's Occupational Health and Safety requirements (HST) and to prevent Sexual Exploitation and Abuse (SEA), Sexual Harassment (HS) and Violence Against Children (VAC).

The company considers that non-compliance with Environmental, Social, Hygiene (ESH) and Safety (ESHS) standards and Occupational Health and Safety (HST) requirements, or failure to participate in activities to fight against Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) as well as Violence Against Children (VAC) whether in the workplace – around the workplace, in work camps, workers or in surrounding communities – constitutes serious misconduct and is therefore subject to sanctions, penalties or possible dismissal. Prosecutions can be initiated by the police against the perpetrators of SEA/SH or VAC, if necessary.

While working on the project, I consent to:

1. Attend and actively participate in training courses related to Environmental, Social, Health (ESH) and Safety (ESHS) standards, and Occupational Health and Safety (OHS) requirements, HIV/AIDS, SEA/SH and VAC, as required by my employer
2. Wear my Personal Protective Equipment (PPE) at all times in the workplace or during project-related activities
3. Take all practical measures to implement the Contractors Environmental and Social Management Plan (E-PGES)
4. Implement the HST Management Plan
5. Adhere to a zero-tolerance policy regarding the consumption of alcohol while at work and refrain from consuming narcotics or other substances that may impair my faculties at any time
6. Let the police check my background
7. Treat women, children (persons under the age of 18) and men with respect, regardless of race, color, language, religion, political or other opinion, national, ethnic, or social origin, level of wealth, disability, citizenship, or other status
8. Not address women, children, or men with inappropriate, harassing, abusive, sexually provocative, degrading or culturally inappropriate language or behavior
9. Not engage in sexual harassment – for example, making unwanted sexual advances, asking for sexual favors, or engaging in any other verbal or physical behavior with a sexual connotation, including subtle acts of such behavior (for example, staring at someone one up and down kissing or blowing kisses making sexual innuendos by making noises; brushing against someone; whistling; giving personal gifts; making comments about someone's sex life, etc.);
10. Not engage in sexual favors – for example, making promises or making favorable treatment conditional on sexual acts – or other forms of humiliating, degrading or abusive behavior
11. Not engage in sexual contact or activity with children (persons under the age of 18) – including the malicious solicitation of children – or contact through digital media; ignorance of the child's age cannot be invoked as a defense; nor can the child's consent constitute a defense or an excuse;

12. Unless full consent without reservations is obtained⁶⁴ of all parties concerned, not to have sexual interactions with members of neighboring communities; this definition includes relationships involving the refusal or promise to actually provide a benefit (monetary or non-monetary) to members of the community in exchange for sexual activity – such sexual activity is considered sexual exploitation and “non-consensual” for purposes of this Code
13. Consider reporting through the complaints and grievances mechanisms or to my manager any suspected or proven cases of SEA/SH or VAC committed by a co-worker, whether co-worker is employed by my company, or any violation of this Code of Conduct.

For children under the age of 18:

14. Whenever possible, ensure that another adult is present when working near children.
15. Not to invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or physical danger
16. Do not use computers, mobile phones, video devices, digital cameras or any other medium to exploit or harass children or to access child pornography (see also the section " Use of images of 'children for professional purposes ' below)
17. Refrain from corporal punishment or disciplinary action against children
18. Refrain from engaging children under the age of 14 for domestic work or any other work, unless national law sets a higher age or exposes them to a significant risk of injury
19. Comply with all relevant local laws, including labor laws relating to child labor and World Bank safeguard policies on child labor and minimum age
20. Take the necessary precautions when photographing or filming children (refer to Annex 2 for further details).

Use of images of children for professional purposes

When photographing or filming a child for professional purposes, I must:

21. Before photographing or filming a child, assess and endeavor to respect local traditions or restrictions on the reproduction of personal images
22. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian; to do this, I have to explain how the photograph or film will be used;
23. Ensure that photographs, films, videos, and DVDs present children in a dignified and respectful manner, and not in a vulnerable or submissive manner; children should be dressed appropriately and not strike poses that could be considered sexually suggestive
24. Ensure images are honest representations of context and facts
25. Ensure that file tags do not reveal information that identifies a child when sending images electronically.

⁶⁴ Full consent without reservations in the context of economic and social power differences between the company employees and the community members might be very hard to prove therefor company employees at any level are strongly discourage of initiating any sexual interactions with community members.

Penalties

I understand that if I violate this Individual Code of Conduct, my employer will take disciplinary action which may include:

1. The informal warning
2. The formal warning
3. Additional training
4. Loss of up to one week's salary
5. Suspension of the employment relationship (without pay), for a minimum period of one month and a maximum period of six months
6. The dismissal
7. Reporting to the police, if applicable

I understand that it is my responsibility to ensure that environmental, social, health and safety standards are met. That I will comply with the Occupational Health and Safety Management Plan. That I will avoid acts or behaviors that could be construed as SEA/SH and VAC. Any such act will constitute a violation of this Individual Code of Conduct. I hereby acknowledge that I have read the aforementioned-Individual Code of Conduct, agree to abide by the standards therein, and understand my roles and responsibilities in preventing and responding to cases related to ESHS standards and requirements HST, SEA/SH and VAC. I understand that any action inconsistent with this Individual Code of Conduct or failure to act in accordance with this Individual Code of Conduct could result in disciplinary action and impact my continued employment.

Signature: _____

Name in full: _____

Title: _____

Date: _____

ANNEX 4: SEA/SH Prevention and Response Action Plan for the Tourism Diversification and Resilience in The Gambia Project

Ministry of Tourism & Culture (MOTC)

Level of Risk Identified through Risk Assessment: **SUBSTANTIAL**

1. Introduction

The World Bank is financing the Tourism Diversification and Resilience in The Gambia Project (P177179) to be implemented by the Ministry of Tourism and Culture (MoTC).

The Project Development Objective (PDO) is to support the diversification, climate, and resilience of the Gambia tourism sector in the selected destinations in the Gambia. In this respect the Project aims to improve the diversification and resilience of the Gambian tourism sector by strengthening institutional and policy frameworks, improving market linkages through technical assistance capabilities and access to funds for tourism related micro, small and medium-size enterprises (MSMEs), and building resilience through the strengthening of sustainable coastal infrastructure and rehabilitation of existing tourism sites.

2. Contextual Risks Related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

Despite Government's commitment to commit to gender equality and to adhere to international and regional treaties and protocols on women's rights, women still make-up the majority of the poor and extremely poor, marginalized and disadvantaged on several fronts⁶⁵.

Women are faced with several disparities in literacy⁶⁶, access to education (mostly post-secondary), and employment. This gender disparity is even larger in rural areas. Over the last years, women in urban areas have been catching-up in terms of literacy as shown by literacy rates of younger cohorts⁶⁷. Women also have limited access to resources such as land and credit and are overrepresented in unpaid labor and with rates of participation in the labor force of 53.2% and 37.8% for men and women respectively⁶⁸, with even higher gaps in urban settings, namely at 37.0 % for women against 70.0% for men (SDC, 2020). Furthermore, the rate of unemployment for women doubles that of men (12.6% versus 6.7%)⁶⁹.

Gender based violence (GBV) remains highly prevalent in The Gambia and it is estimated that 46 percent of women have experienced physical violence at least once since age 15; 41 percent of ever-married women aged 15-49 have ever experienced any form of emotional, physical, or sexual violence committed by any husband/partner⁷⁰. In addition nearly 76 percent of women 15-49 years old report to have undergone any form of Female Genital Mutilation (FGM); 26 percent of women 20- 24 years old had married before the age of 18 and 54 percent of women 20- 24 years old is married or in union with a spouse that is 10 or more years older.⁷¹ Despite the Government's commitment to promoting women's empowerment and steps taken through the Women's Act 2010, there is currently no national legal framework that criminalizes domestic violence and sexual harassment, there is no minimum age for marriage and no provisions to criminalize FGM. Social norms reflect deeply rooted inequality between

⁶⁵ [http://www.afdb.org/fileadmin/uploads/afdb/Documents/Project-and-Operations/GAMBIA%20Gender%20Profile%20final%20\(2\).pdf](http://www.afdb.org/fileadmin/uploads/afdb/Documents/Project-and-Operations/GAMBIA%20Gender%20Profile%20final%20(2).pdf)

⁶⁶ In The Gambia, 65.9% of the male population aged 15 years or above is literate compared to 45.0 % of females.

⁶⁷ For example, the rates for female and male populations aged 15-19 are 72.2% and 78.3%, respectively.

⁶⁸ 2013 Population and Housing Census. The Gender Report. http://www.gbos.gov.gm/uploads/census/2013/Gender-Report_Final.pdf

⁶⁹ ILO statistics.

https://www.ilo.org/shinyapps/bulkexplorer15/?lang=en&segment=indicator&id=EAP_3WAP_SEX_AGE_GEO_RT_A

⁷⁰ Demographic Health Survey, 2019-20

⁷¹ Multiple Indicator Cluster Survey (MICS) UNICEF 2019

<https://www.unicef.org/gambia/media/776/file/The%20Gambia%20Multiple%20Indicator%20Cluster%20Survey%202018.pdf>

men and women, and proxy indicators for social norms appear to legitimize, condone, and promote GBV. Help seeking behaviour is low as 65 percent of women, who ever experienced physical or sexual violence, never sought help and never told anyone.

Outcomes of the extensive stakeholder consultations during project preparation revealed that poverty is a key factor leading to becoming sex worker, at times as a result of open family pressure who see their daughters or sons sex work as the only (or best) solution to financially provide for the family or not being able to secure other ways of employment. In rural settings where education outcomes, especially for girls, remain low, prevalent social norms about early marriage and child rearing often stream women out of the formal workforce. The illegality of sex work in the Gambia increases the risks of gender based violence as well as sexual exploitation and abuse of people engaged in sex work by the clients.

The Ministry of Gender highlighted the degrading effects on the country of its image related to sex tourism. Women in the Gambia and especially those working in tourism related industries (hotels, restaurants, vendors in touristic places etc.) face risk of sexual harassment, exploitation, and abuse as well as risks of domestic violence if husbands or fathers are jealous/suspicious that their wife/daughters are engaging in paid sex.

The implementation of project activities, particularly in Sub-component 1B (Matching grant scheme) and in component 2 (Infrastructure Support for the Diversification and Resilience of the Tourism Sector, Protection, rehabilitation, and integrated management of coastal areas) although expected to have both positive also run risks in more detrimental situations for women and increasing the gender gap in the Gambia. More precisely, the construction/improvement of Tourism infrastructures and/or services are likely to raise concerns. Partly related to the arrival of hundreds of tourists and countless weekenders in the Gambia which could increase the demand for prostitution and other sex-related activities, but also related to contractor's workers as labor influx is likely to increase the demand for sexual activities and ultimately the risks of GBV, more precisely SEA/SH and violence against children (VAC), while raising other safety, security, and health issues (IST, HIV/AIDS, viral hepatitis, HPV, COVID-19 exposure, and other communicable diseases).

3. Risk Management Systems

The main goal of this plan is to create a tool for evaluation, implementation and monitoring of measure designed to prevent and produce adequate response to SEA/SH risks associated with activities of the Gambia Tourism Diversification and Resilience Project. The Ministry of Tourism and Culture (MOTC) and the PIU with the Social Development Specialist (SSS), and GBV Specialist (GBVS), working in tandem with the regional/district MOTC and representatives of other relevant Ministries will oversee implementation of the activities of the SEA/SH Prevention and Response Action Plan under the supervision of the PIU Coordinator. The World Bank will provide technical support.

The table below lists the key measures and activities necessary to achieve them, and indicates the timeline, people in charge of implementation and monitoring, the budget, and indicators to measure progress. The plan should be reviewed once the GBV specialist is hired (and at regular intervals should it be deemed necessary), so the planned activities and budget are relevant and efficient. The project PIU will ensure the commitments and planned activities in this SEA/SH Prevention and Response Action Plan are operationalized through the project's annual work plan and budget, and progress in implementation is included in regular reports to the World Bank.

Sexual Exploitation and Abuse and Sexual Harassment Prevention and Response Action Plan (SEA/SH Action Plan)

| | Activity to Address SEA/SH risk | Steps to be taken | Timeline | Responsible | Monitoring (Who will monitor?) | Output indicators | Estimated Budgets (\$ USD) |
|---|--|---|---|---|---|--|-------------------------------|
| 1 | <i>Sensitize Borrower (and, where relevant, Supervising Engineer and Contractor and National Environmental Agency) on the importance of addressing SEA/SH on the project, and the mechanisms that will be implemented</i> | | | | | | |
| | Train on SEA and SH to include: <ol style="list-style-type: none"> Accountability and response framework Responsibilities and reporting Confidentiality and whistle blower protection clauses | <ul style="list-style-type: none"> Develop SEA/SH training PowerPoint and Briefing Notes for project grantees and workers. Schedule separate training sessions for various project grantees and workers. Train project actors with the PowerPoint training materials prepared. Adapt existing training material to facilitate refresher training. Organize and conduct annual refresher training for all project workers to enhance capacity for continuing SEA-SH mitigation, prevention, and response. | Within first 3 months of project and annually thereafter | PIU Environment, Social and GBV Specialists (GBV Specialist leading) | PIU & NEA PIU Coordinator E&S risk mitigation team in PIU (including GBV specialist) | Training content to aid sensitization of project actors available. Project workers have clarity on SEA/SH prohibitions on the project and are empowered to contribute to mitigation and reporting of cases. | 10,000 |
| 2 | <i>Assess SEA/SH risks in project sites and map out GBV prevention and response service providers able to provide care to SEA/SH survivors</i> | | | | | | |
| | Conduct an SEA and SH risk assessment in project area to inform risk | <ul style="list-style-type: none"> Integrate task related to SEA/SH risk assessment and GBV service providers mapping and capacity evaluation into Environmental and Social Assessment or other relevant studies that will be done by the project | 3 months after project effectiveness (and before start of project activities) | PIU GBV Specialist and E&S Risk Mitigation team Consultants hired for the evaluation | PIU Coordinator Safeguard team | <ul style="list-style-type: none"> SEA/SH risks assessed and analyzed within the studies GBV Service mapping and capacity review conducted | 15,000 |

| | | | | | | | |
|--|--|---|--|--|---|--|---------------|
| | <p>mitigation strategies, including analysis of GBV issues, services, and gaps in services</p> <p>Map out and review capacity and quality of GBV service providers in the project area able to provide care and support SEA and SH survivors</p> | <ul style="list-style-type: none"> Review the mapping and capacity review tools prepared by consultant that will conduct the task Ensure that the report on GBV service mapping gives clear recommendation on the best service providers to be included in the response protocol of the project GM. | | | | | |
| 3 Ensure project GM is sensitive to SEA/SH complaints | | | | | | | |
| a. | <p>Develop specific SEA/SH procedures within GM of the project</p> <p>\</p> | <ul style="list-style-type: none"> Review GM to ensure that its description includes confidential channels for reporting SEA/SH cases, it is survival centered, and has referral pathways linked with quality GBV service providers. Review complaint intake forms/logbooks for SEA/SH complaints and develop ethical data sharing and storing protocols. Ensure that the Grievance Resolution Committee comprises of persons with experience in working on GBV and train them on the SEA/SH complaint management. | <p>Within 4 months after effectiveness of the project and before the start of project activities</p> | <p>GBV Specialist and Safeguard team</p> | <p>PIU Coordinator</p> <p>Safeguard team</p> <p>PIU/NEA</p> | <p>Confidential and survival centered GM established</p> <p>Percentage of SEA/SH survivors who submitted complaints referred to GBV service provider</p> | <p>10,000</p> |

| | | | | | | | |
|----|--|--|---|--|-----------------------------------|--|-------------------------|
| | Develop and/or update a multi-sectoral GBV/SEA/SH referral pathway(s) for all project sites | <ul style="list-style-type: none"> Develop response protocols for each project implementation region using recommendations on GBV services mapped and evaluated (at minimum referral to medical, psychosocial and legal aid services should be available). Consult with community women in project host communities to designate persons that are accessible, safe, and trustworthy to become the entry points for SEA/SH complaints. Train the selected entry points on how to receive, refer and escalate SEA/SH cases to the Grievance Resolution Committee. | | | | | |
| b. | Stakeholder consultations | <ul style="list-style-type: none"> Regularly consult women in project communities to enquire about the safety and accessibility of the GM procedures. | Continue on regular basis during project life (Iterative process) | PIU GBV Specialist and Safeguard team, Management Company (MC)/NEA | GBV Specialist and Safeguard team | Number of consultations held Number of women who took part in consultations | 5,000 |
| 4 | Strengthen Institutional capacity for SEA and SH risk mitigation and response | | | | | | |
| a. | Engage/hire a GBV Specialist to supervise and provide technical support for the implementation of SEA/SH Action Plan | <ul style="list-style-type: none"> Develop the ToR for hire of GBV Specialist of the PIU Send TOR to Bank for No Objection Hiring of a GBV Specialist within the PIU | ASAP but no later than 3 months after project Effective Date | PIU | PIU | GBV Specialist is hired and operational | Project Management Cost |

| | | | | | | | | | |
|----|---|---|---|---|--|---|-----------------------|--|--|
| b. | <p>Support capacity of local systems to respond to SEA and SH (e.g., police, health, legal, CDOs, CBOs)</p> <p>i) Strengthen the reporting mechanisms & procedures of local systems</p> <p>ii) Strengthen a survivor centred referral and response.</p> <p>iii) Strengthen coordination for better services with local/national GBV/SEA service providers</p> | <ul style="list-style-type: none"> Organize discussions and agreements with identified GBV service providers to formally outline process for referrals, tackling and feedback between the project and service providers on cases and how to handle data and to enhance ownership of the process of handling SEA/SH cases. Discuss and agree on financial and/or technical support arrangements with each service provider if seen as necessary during the mapping and evaluation of quality of GBV services). Embark on periodic visits and engagement with service providers to review effectiveness and efficiency of reporting system, and interaction and resolution of cases. Organize annual stakeholders' forum to share information, receive and incorporate feedback for improvement. Coordinate with stakeholders on common communication or advocacy actions/ events/ policies/ protocols to prevent and respond to GBV, SEA/SH risks | <p>After response protocol had been developed and annually thereafter</p> | <p>PIU GBV Specialist and Safeguard team,</p> | <p>PIU Coordinator and Safeguard team</p> | <p>Service providers are empowered to respond to SEA/SH related cases from the project.</p> <p># Of services supported</p> <p># Of actions/events organized</p> | <p>10,000 (TBC)</p> | | |
| 5 | <p>Ensure integration of SEA/SH requirements in procurement processes and contracts</p> | | | | | | | | |
| a) | <p>Incorporate SEA and SH requirements and expectations in all procurement</p> | <ul style="list-style-type: none"> Review the project Code of Conducts to ensure SEA/SH has been addressed and sanctions have been listed Review and ensure the adoption of specific SEA/SH measures in policies | <p>Before the physical start of civil works and throughout the project implementation. (Initial training before signing</p> | <p>Procurement and Safeguard Specialists</p> <p>Contracts and Administrative Managers</p> | <p>PIU Coordinator</p> <p>Safeguard Team</p> | <p>Sub-contractors and Consultants have the required guidance to meet SEA/SH requirements on the project.</p> | <p>Project Budget</p> | | |

| | | | | | | | | |
|---|---|---|---|--|-----------------------------------|--|--------|--|
| | documents for sub-contractors' and consultants' contracts | <ul style="list-style-type: none"> and procedures for all Project sub-contractors and consultants including signing of CoC. Organize trainings on SEA/SH and content of CoC for all project personnel and direct workers Ensure sub-contractors and consultant provide training to SEA/SH and content of CoC to all personnel and workers | and refresher training at regular bases, at least every 6 months) | | | <p>% Of staff who signed the code of conduct</p> <p># Of staff trained on SEA/SH, content of the CoC and sanctions for misconduct</p> | | |
| 6 Inform project stakeholders about SEA/SH risks and mitigation procedures | | | | | | | | |
| a) | Awareness raising to inform project stakeholders including project host communities on SEA/SH risks and mitigation strategies | <ul style="list-style-type: none"> Integrate SEA/SH awareness raising on related risks and mitigation procedures into stakeholder consultations and engagements. Conduct awareness raising outreach campaigns to publicize SEA/SH reporting channels and response procedures in project host communities and with separate meeting with women and girls. Design relevant communication and information materials including posters and sticker on zero tolerance of SEA/SH to support sensitization exercise.⁷² | Within 6-month of project effectiveness and regularly throughout the project implementation | GBV Specialist | PIU Coordinator E&S & GBV team | <p>Number of awareness raising sessions on SEA/SH, content to CoC, ways to signal misconduct or abuse and services available organized</p> <p># Of people reached (disaggregated by sex)</p> <p>Communication and information materials produced</p> | 15,000 | |
| g) | Hold consultations with stakeholders to obtain inputs on potential SEA/SH | <ul style="list-style-type: none"> Hold separate consultations with men and women during site specific screening of E&S risks in project implementation communities. Engage experienced female community facilitators to hold | Prior to implementation of site-specific activities and throughout the project life | GBV Specialist E&S Risk Management team | PIU Coordinator Safeguard team | <p># Of consultations held</p> <p># Of separate consultations with women held</p> | | |

⁷² Communication materials will not include images showing violent acts or portraying women/girls in humiliating positions.

| | | | | | | | | |
|--|---|---|-------------------------------|-----|-----|---|--------|--|
| | risks related to project activities, and feedback on the mitigation measures planned. | <p>separate meetings with women and girls to explore potential E&S risks envisaged on project activities⁷³ and discuss effectiveness of the prevention and response measures planned and implemented by the project</p> <ul style="list-style-type: none"> Consider all additional SEA/SH risks raised and propose mitigation measures to revise and amend the environmental and social management plan (ESMP). | | | | # Of people participating in consultations (disaggregated by sex) | | |
| 7 Separate toilet and shower facilities for men and women and SEA and SH-free signage | | | | | | | | |
| a. | Provide separate facilities for men and women and display signs, posters and pamphlets around the project site that signal to workers and the community that the project site is an area where SH is prohibited | Construction of Separate and identifiable toilets with the needed security | During project implementation | PIU | PIU | Report | 10,000 | |
| 8. Coordination, Monitoring, and Management | | | | | | | | |

⁷³ No questions about individual experience of violence will be asked.

| | | | | | | | | |
|--|---|---|---------------------------------------|--|-----------------|---|-----------|--|
| | Institute reporting, accountability, and feedback mechanism | <ul style="list-style-type: none"> • Develop monitoring indicators on the functioning of SEA/SH prevention and response system. • Institute biannual reports and feedback between grantees and the PIU and the World Bank • Include discussions on SEA/SH compliance into Project Team meeting agenda. <p>Undertake regular progress monitoring of SEA/SH prevention and response activities on project sites and provide feedback to improve performance.</p> | Throughout the project implementation | GBV Specialists, ES Risk Management Team | PIU Coordinator | Enhanced supervision and implementation of SEA/SH requirements and procedures | | |
| | | Total Budget | | | | | 75,000.00 | |

ANNEX 5. SUB-PROJECT SOCIAL AND ENVIRONMENTAL SCREENING FORM AND GUIDELINES

Date:

Location:

Region/community:

Name:

Job title:

Telephone numbers:

E-mail address:

Signature:

Section B

Project activity (for each project site select one project activity at a time and evaluate its impacts, mitigation, and adaptation measures by using the checklist in Section C).

SECTION C: Check List

This ESMF analyses the potential adverse impacts of implementing the project by looking at the probability, scale, significance and scope, magnitude, duration, reversibility, and availability of effective mitigation measures. It employs a rating scale of 1-3 with a scale of 3 denoting high impact, 2 denoting Medium/low significance impact and 1 denoting null/insignificant impact.

Section B

Project activity (for each project site select one project activity at a time and evaluate its impacts, mitigation, and adaptation measures by using the checklist in Section C).

SECTION C: Check List

This ESMF analyses the potential adverse impacts of implementing the project by looking at the probability, scale, significance and scope, magnitude, duration, reversibility, and availability of effective mitigation measures. It employs a rating scale of 1-3 with a scale of 3 denoting high impact, 2 denoting Medium/low significance impact and 1 denoting null/insignificant impact

| ADVERSE IMPACTS | 1 | 2 | 3 | REMARKS & MITIGATIONS MEASURES |
|--|---|---|---|--------------------------------|
| Project Siting | | | | |
| Will the activity compete for the following use to which you put the land? | | | | |
| Trees | | | | |
| Water | | | | |
| Forest in your surrounding | | | | |

| ADVERSE IMPACTS | 1 | 2 | 3 | REMARKS & MITIGATIONS MEASURES |
|--|---|---|---|-----------------------------------|
| Potential Environmental and Social Impacts | | | | |
| Will the activity increase the following issues in the country? | | | | |
| Paper waste | | | | |
| Plastic waste | | | | |
| Liquid waste | | | | |
| Will the activity increase the need for security and safety during implementation? | | | | |
| Will the activity affect drainage in the surrounding? | | | | |
| Loss of land, restriction of access to land or resources | | | | |
| Economic activities impacts of the affected communities | | | | |
| Impacts on communities' livelihood | | | | |

| ADVERSE IMPACTS | 1 | 2 | 3 | REMARKS & MITIGATIONS MEASURES |
|---|---|---|---|-----------------------------------|
| Project Siting | | | | |
| Does the Activity take place in a densely populated area? | | | | |
| Are there dwellings in the area? Businesses and other livelihood activities? Essential services (i.e. transmissions lines, schools, hospitals, etc.) List types of dwellings and livelihood activities | | | | |
| Adjacent to or within any environmentally or socially sensitive areas, such as cultural sites, protected area, wetland, mangrove, estuarine, bay, near cemetery or community assets? | | | | |
| Potential Environmental Impacts | | | | |

| ADVERSE IMPACTS | 1 | 2 | 3 | REMARKS & MITIGATIONS MEASURES |
|---|---|---|---|-----------------------------------|
| Are there any environmentally sensitive areas that could be adversely affected by the activity? | | | | |
| Are there any threatened species that could be adversely affected by the Activity? | | | | |
| Are there potentials of introducing alien species due to the activity? | | | | |
| Are there land use changes that are likely to affect ecosystems and services due to the activity? | | | | |
| Will the activity affect ground water recharge due to excessive extraction of water for irrigation? | | | | |
| Is there a need to cut down any trees? | | | | |
| Will the activity affect the aesthetic attractiveness of the local landscape? | | | | |
| Will the project generate temporary or permanent traffic disturbances, interfere with or block access, routes etc. (for people, livestock, and wildlife) or traffic routing and flows, due to construction material transport and wastes? | | | | |
| Land Acquisition and/or Resettlement | | | | |
| Will involuntary resettlement, land acquisition, relocation of property, or loss, denial, or restriction of access to land and other economic resources (i.e., crop fields and rivers) be caused by the activity? | | | | |
| Would the activity lead to dislocation or involuntary resettlement of people? | | | | |
| Will the activity involve restriction on access of land, livelihood and economic displacement? | | | | |
| Is this impact permanent or temporary? | | | | |
| Will the project impact sensitive communities or vulnerable persons or groups? (for example: vulnerable livelihoods, elderly, persons with disabilities, youth/children, women)? | | | | |
| Noise and Air Emissions | | | | |

| ADVERSE IMPACTS | 1 | 2 | 3 | REMARKS & MITIGATIONS MEASURES |
|--|---|---|---|-----------------------------------|
| Will this activity increase GHG emissions in the energy sector? | | | | |
| Will this activity increase GHG emissions in the Industrial Processes and Product Use Sector (IPPU)? | | | | |
| Will this activity increase GHG emissions in the Industrial Processes and Product Use Sector (IPPU)? | | | | |
| Will this activity increase GHG emissions in the Agriculture, Forestry and Other Land use sector? | | | | |
| Will this activity increase GHG emissions in the Waste sector? | | | | |
| Will the operating noise level from the equipment use in this activity exceed the allowable decibel level or noise limits? | | | | |
| Will the activity cause smell, and an influx of insects, rodents, etc.? | | | | |
| Solid or Liquid Wastes Generation | | | | |
| Will the activity generate solid, liquid, or hazardous wastes? (Including shipping and package waste, domestic and sanitation waste, asbestos, PCB etc.) | | | | |
| Will the activity cause impairment of downstream water quality, risk causing contamination of drinking water, inadequate wastewater treatment or release of untreated wastewater/sewage? | | | | |
| Will the activity generate chemical contamination of soil and ground water? | | | | |
| Occupational health hazards | | | | |
| Will this require a large number of staff and workers; large/long-term construction camp? | | | | |
| Do you have an estimate of how many workers will be employed in this activity? | | | | |
| Will you hire workers from the local community? | | | | |

| ADVERSE IMPACTS | 1 | 2 | 3 | REMARKS & MITIGATIONS MEASURES |
|---|---|---|---|--------------------------------|
| Would this activity create social conflict between construction workers from other areas and community workers? | | | | |
| Is there a concern about labor influx on community health and safety including transmission of communicable diseases and SEA/SH? | | | | |
| Do you agree, monitor, and comply with the labor recruitment policy and apply the core labor standards (i.e., freedom of association, prohibition of child labor, prohibition of discrimination, and prohibition of forced labor; equal pay, safe working conditions, social security)? | | | | |
| Are the infrastructure of this activity prone to hazards, risks and could they result in accidents and injuries to workers? | | | | |
| Will the infrastructure of this activity require frequent maintenance and/or repair? | | | | |
| Gender/inclusion questions | | | | |
| Do you have a policy related to supporting the rights of women and ensuring women's participation in this activity? | | | | |
| Are there any specific benefits provided to women? (e.g., maternity/childbearing insurance, day shift arrangements for mothers) | | | | |
| Is there any opportunity to promote opportunities or empowerment of women/elderly/persons with disabilities/youth in this activity? | | | | |

Public Consultation and Disclosure

Has public consultation and participation been sought?

Yes _____ No _____

If no, why not

If yes, when, where and with whom

ANNEX 6. TOR SAMPLE AND INDICATIVE OUTLINE FOR AN ESIA

PROJECT CONTEXT AND JUSTIFICATION

Project Context

1. [In this section you need to describe the context and the project, including the project development objectives and project components]

Justification

2. [In this section, you need to include the project justification]

B. ESIA REQUIREMENTS

3. The Borrower will carry out an Environmental and Social Impact Assessment (ESIA) of the project to assess its environmental and social risks and impacts of the project throughout the project life cycle.⁷⁴ The assessment will be proportionate to the potential risks and impacts of the project, and will assess, in an integrated way, all relevant direct,⁷⁵ indirect⁷⁶ and cumulative⁷⁷ environmental and social risks and impacts (including those related to gender based violence (GBV) and sexual exploitation and abuse/sexual harassment (SEA/SH) throughout the project life cycle, including those specifically identified in the Environmental and Social Standards (ESSs) 2–10 of the World Bank’s Environmental and Social Framework (ESF).
4. The ESIA will be based on current information, including an accurate description and delineation of the project and any associated aspects, and environmental and social baseline data at an appropriate level of detail sufficient to inform characterization and identification of risks and impacts and mitigation measures. The ESIA will evaluate the project’s potential environmental and social risks and impacts; examine project alternatives; identify ways of improving project selection, siting, planning, design and implementation in order to apply the mitigation hierarchy⁷⁸ for adverse environmental and social impacts and seek opportunities to enhance the positive impacts of the project. The ESIA will include stakeholder engagement as an integral part of the assessment, in accordance with ESS 10.
5. The ESIA will be an adequate, accurate, and objective evaluation and presentation of the known risks and impacts, prepared by qualified and experienced persons.
6. The Borrower will ensure that the ESIA considers in an appropriate manner all issues relevant to the project, including:

⁷⁴This may include preconstruction, construction, operation, decommissioning, closure and Reinstatement/restoration.

⁷⁵ A direct impact is an impact which is caused by the project and occurs contemporaneously in the location of the project.

⁷⁶ An indirect impact is an impact which is caused by the project and is later in time or farther removed in distance than a direct impact, but is still reasonably foreseeable, and will not include induced impacts.

⁷⁷ The cumulative impact of the project is the incremental impact of the project when added to impacts from other relevant past, present and reasonably foreseeable developments as well as unplanned but predictable activities enabled by the project that may occur later or at a different location. Cumulative impacts can result from individually minor but collectively significant activities taking place over a period of time. The environmental and social assessment will consider cumulative impacts that are recognized as important on the basis of scientific concerns and/or reflect the concerns of project-affected parties. The potential cumulative impacts will be determined as early as possible, ideally as part of project scoping.

⁷⁸ See paragraph 7, which explains the mitigation hierarchy.

- the country's applicable policy framework, national laws and regulations, and institutional capabilities (including implementation) relating to environment and social issues⁷⁹; variations in country conditions and project context; country environmental or social studies; national environmental or social action plans; and obligations of the country directly applicable to the project under relevant international treaties and agreements; recognition of ethnic minorities or indigenous peoples (if applicable), rights of women, rights of the child, migrant workers, persons with disabilities, etc., including the institutions responsible for the policy and legal framework.
- applicable requirements under the ESSs; and
- the Environmental and Health Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP).⁸⁰

7. The ESIA will set out and apply a mitigation hierarchy, which will:

- i. Anticipate and avoid risks and impacts;
- ii. Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels;
- iii. Once risks and impacts have been minimized or reduced, mitigate;⁸¹ and
- iv. Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.⁸²

8. The ESIA, informed by the scoping of the issues, will take into account all relevant environmental and social risks and impacts of the project, including:

9. **Environmental risks and impacts, including:** (i) those defined by the EHSGs; (ii) those related to community safety (including dam safety and safe use of pesticides); (iii) those related to climate change and other transboundary or global risks and impacts; (iv) any material threat to the protection, conservation, maintenance and restoration of natural habitats and biodiversity; and (v) those related to ecosystem services⁸³ and the use of living natural resources, such as fisheries and forests

⁷⁹ This should include the description of policies and laws related to gender discrimination and GBV, sexual exploitation and abuse (SEA) and sexual harassment, as well as child protection. This includes any laws or policies regulating the relationship between women and men both in professional and private spheres of life and/or existing gender diagnostics or country action plans or strategies addressing GBV.

⁸⁰ Good International Industry Practice (GIIP) is defined as the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally. The outcome of such exercise should be that the project employs the most appropriate technologies in the project-specific circumstances.

⁸¹ The requirement to mitigate impacts may include measures to assist project-affected parties to improve or at least restore their livelihoods as relevant in a particular project setting.

⁸² The Borrower will make reasonable efforts to incorporate the costs of compensating and/or offsetting for the significant residual impacts as part of project costs. The environmental and social assessment will consider the significance of such residual impacts, the long-term effect of these on the environment and project-affected people, and the extent to which they are considered reasonable in the context of the project. Where it is determined that it is not technically or financially feasible to compensate or offset for such residual impacts, the rationale for this determination (including the options that were considered) will be set out in the environmental and social assessment.

⁸³ Ecosystem services are the benefits that people derive from ecosystems. Ecosystem services are organized into four types: (i) provisioning services, which are the products people obtain from ecosystems and which may include food, freshwater, timbers, fibers, and medicinal plants; (ii) regulating services, which are the benefits people obtain from the regulation of ecosystem processes and which may include surface water purification, carbon storage and sequestration, climate regulation, protection from natural hazards; (iii) cultural services, which are the nonmaterial benefits people obtain from ecosystems and which may include natural areas that are sacred sites and areas of importance for recreations and

10. **Social risks and impacts, including:** (i) threats to human security through the escalation of personal, communal or inter-state conflict, crime or violence⁸⁴; (ii) risks that project impacts fall disproportionately on individuals and groups who, because of their particular circumstances, may be disadvantaged or vulnerable;⁸⁵ (iii) any prejudice or discrimination toward individuals or groups in providing access to development resources and project benefits, particularly in the case of those who may be disadvantaged or vulnerable; (iv) cultural, gender, and social norms and practices, particularly those which are harmful to women and girls and that would be exacerbated as a result of project implementation. This includes power dynamics, division of labor and participation in decision-making processes in both professional and private spheres; (v) existing data regarding GBV, including data on partner/non-partner sexual violence and physical violence, SEA/SH, intimate partner violence, family violence, early marriage, and harmful traditional practices, especially those particularly at risk of being exacerbated by project implementation⁸⁶; (vi) negative economic and social impacts relating to the involuntary taking of land or restrictions on land use; (v) risks or impacts associated with land and natural resource tenure and use,⁸⁷ including (as relevant) potential project impacts on local land use patterns and tenurial arrangements, land access and availability, food security and land values, and any corresponding risks related to conflict or contestation over land and natural resources; (vi) impacts on the health, safety and well-being of workers and project-affected communities; and (vii) risks to cultural heritage.
11. Where the ESIA identifies specific individuals or groups as disadvantaged or vulnerable, women and girls, the Borrower will propose and implement differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing any development benefits and opportunities resulting from the project.
12. For projects involving multiple small subprojects,⁸⁸ that are identified, prepared and implemented during the course of the project, the Borrower will carry out appropriate environmental and social assessment of subprojects, and prepare and implement such subprojects, as follows: (a) High Risk subprojects, in accordance with the ESSs; (b) Substantial

aesthetic enjoyment; and (iv) supporting services, which are the natural processes that maintain the other services and which may include soil formation, nutrient cycling and primary production.

⁸⁴ This includes Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).

⁸⁵ Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon which they depend.

⁸⁶ Potential sources of this information include data from the Demographic and Health Surveys and from the Gender Sustainable Development Goals.

⁸⁷ Due to the complexity of tenure issues in many contexts, and the importance of secure tenure for livelihoods, careful assessment and design is needed to help ensure that projects do not inadvertently compromise existing legitimate rights (including collective rights, subsidiary rights, and the rights of women) or have other unintended consequences, particularly where the project supports land titling and related issues. In such circumstances, the Borrower will at a minimum demonstrate to the Bank's satisfaction that applicable laws and procedures, along with project design features (a) provide clear and adequate rules for the recognition of relevant land tenure rights; (b) establish fair criteria and functioning, transparent and participatory processes for resolving competing tenure claims; and (c) include genuine efforts to inform affected people about their rights and provide access to impartial advice.

⁸⁸ For example, a Bank-supported project with multiple small subprojects, as in the case of community-driven development projects, projects involving matching grant schemes, or similar projects designated by the Bank.

Risk, Moderate Risk and Low Risk subprojects, in accordance with national law and any requirements of the ESSs that the Bank deems relevant to such subprojects.⁸⁹

13. If the risk rating of a subproject increases to a higher risk rating, the Borrower will apply the relevant requirements of the ESSs and the project Environmental and Social Commitment Plan (ESCP) will be updated as appropriate.
14. The ESIA will also identify and assess, to the extent appropriate, the potential environmental and social risks and impacts of Associated Facilities. The Borrower will address the risks and impacts of Associated Facilities in a manner proportionate to its control or influence over the Associated Facilities. To the extent that the Borrower cannot control or influence the Associated Activities to meet the requirements of the ESSs, the environmental and social assessment will also identify the risks and impacts the Associated Facilities may present to the project.
15. For projects that are High Risk or contentious or that involve serious multidimensional environmental or social risks or impacts, the Borrower may be required to engage one or more internationally recognized independent experts. Such experts may, depending on the project, form part of an advisory panel or be otherwise employed by the Borrower, and will provide independent advice and oversight to the project.⁹⁰
16. The ESIA will also consider risks and impacts associated with the primary suppliers⁹¹ as required by ESS 2 and ESS 6. The Borrower will address such risks and impacts in a manner proportionate to the Borrower's control or influence over its primary suppliers as set out in ESS2 and ESS6.
17. The ESIA will consider potentially significant project-related transboundary and global risks and impacts, such as impacts from effluents and emissions, increased use or contamination of international waterways, emissions of short- and long-lived climate pollutants,⁹² climate change mitigation, adaptation, and resilience issues, and impacts on threatened or depleted migratory species and their habitats.

C. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

18. As set out in ESS 10, the Borrower will continue to engage with, and provide sufficient information to stakeholders throughout the life cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project.
19. The ESIA must include a description of how the Borrower will propose and implement a grievance mechanism (GM) to address these concerns and receive complaints, including SEA/SH complaints, and facilitate their resolution. This description would be derived from the Stakeholder Engagement Plan (SEP). The ESIA will clearly define roles, responsibilities and

⁸⁹ Where subprojects are likely to have minimal or no adverse environmental or social risks and impacts, such subprojects do not require further environmental and social assessment following the initial scoping.

⁹⁰ This requirement relates to the independent advice and oversight of such projects and is not related to circumstances in which the Borrower will be required to retain independent specialists to carry out environmental and social assessment.

⁹¹ Primary suppliers are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project. Core functions of a project constitute those production and/or service processes essential for a specific project activity without which the project cannot continue.

⁹² This includes all greenhouse gases (GHGs) and black carbon (BC).

accountabilities and designate the persons who will be responsible for implementing and monitoring stakeholder engagement activities and ensuring compliance with national laws and regulations, as well as the requirements of the World Bank ESF.

20. For High Risk and Substantial Risk projects, the Borrower will provide to the Bank and disclose documentation, as agreed with the Bank, relating to the environmental and social risks and impacts of the project prior to project appraisal. The documentation will address, in an adequate manner, the key risks and impacts of the project, and will provide sufficient detail to inform stakeholder engagement and Bank decision making. The Borrower will provide to the Bank and disclose final or updated documentation as specified in the ESCP.
21. If there are significant changes to the project that result in additional risks and impacts, particularly where these will impact project-affected parties, the Borrower will provide information on such risks and impacts and consult with project-affected parties as to how these risks and impacts will be mitigated. The Borrower will disclose an updated ESCP, setting out the mitigation measures.

D. PROJECT MONITORING AND REPORTING

22. The Borrower will monitor the environmental and social performance of the project in accordance with the legal agreement (including the ESCP). The extent and mode of monitoring will be agreed upon with the Bank and will be proportionate to the nature of the project, the project's environmental and social risks and impacts, and compliance requirements. The Borrower will ensure that adequate institutional arrangements, systems, resources and personnel are in place to carry out monitoring. Where appropriate and as set out in the ESCP, the Borrower will engage stakeholders and third parties, such as independent experts, local communities or NGOs, to complement or verify its own monitoring activities. Where other agencies or third parties are responsible for managing specific risks and impacts and implementing mitigation measures, the Borrower will collaborate with such agencies and third parties to establish and monitor such mitigation measures.
23. Monitoring will normally include recording information to track performance and establishing relevant operational controls to verify and compare compliance and progress. Monitoring will be adjusted according to performance experience, as well as actions requested by relevant regulatory authorities and feedback from stakeholders such as community members. The Borrower will document monitoring results.
24. The Borrower will provide regular reports as set out in the ESCP (in any event, no less than annually) to the Bank of the results of the monitoring. Such reports will provide an accurate and objective record of project implementation, including compliance with the ESCP and the requirements of the ESSs. Such reports will include information on stakeholder engagement conducted during project implementation in accordance with ESS10. The Borrower, and the agencies implementing the project, will designate senior officials to be responsible for reviewing the reports.
25. Based on the results of the monitoring, the Borrower will identify any necessary corrective and preventive actions and will incorporate these in an amended ESCP or the relevant management tool, in a manner acceptable to the Bank. The Borrower will implement the agreed corrective and preventive actions in accordance with the amended ESCP or relevant management tool and monitor and report on these actions.

26. The Borrower will facilitate site visits by Bank staff or consultants acting on the Bank's behalf. The Borrower will notify the Bank promptly 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. The notification will provide sufficient detail regarding such incident or accident, including any fatalities or serious injuries. The Borrower will take immediate measures to address the incident or accident and to prevent any recurrence, in accordance with national law and the ESSs.

E. KEY PRINCIPLES AND TASKS OF THE ESIA

27. The ESIA will provide more precisely the following:

- explicit methodological procedures and approaches for consideration of environmental and social aspects, standard mitigation measures and tools needed to identify impacts and mitigation measures.
- The roles and responsibilities of the different structures involved in the implementation and monitoring of the Project.
- The training, capacity building and other technical assistance needs necessary for the implementation of the ESIA.
- An estimate of the budget needed to carry out ESIA activities (which will subsequently be included in the project budget and related investments).

28. The Environmental and Social Management Framework (ESIA) of the project will also have to comply with the country's environmental legislation.

29. Because of the potential negative impacts of some project developments on the socio-economic and natural resource base of countries, these safeguards, in addition to understanding positive impacts, provide an operational framework for the identification, analysis of negative impacts and appropriate mitigation measures by avoiding or eliminating negative environmental and social impacts or reducing them to an acceptable level.

30. The main tasks and associated results or deliverables are described below:

- a) Describe the biophysical environment and the environmental and social situation in the Project intervention area, which represent the baseline of the Project;
- b) Describe and provide baseline data for the social environment;
- c) The political, legal and institutional framework for environmental management and assessment of impacts relevant to the nature of the project;
- d) The procedures of [COUNTRY] in the Environmental and Social Assessment process;
- e) Institutional modalities for consideration of environmental and social aspects in the implementation of sub-projects / activities at the community level;
- f) Identify, evaluate and measure the extent of positive and negative impacts and direct and indirect environmental risks in the Project's areas of intervention;
 - include the impact on people by the specific activities of the project, including public health (malaria, schistosomiasis, other forms of water-related diseases and pesticide misuse) and proposed appropriate mitigation measures

- g) Identify, evaluate and measure the extent of positive and negative impacts and direct and indirect social risks in the Project's areas of intervention;
- include differentiated mitigation/social inclusion measures for vulnerable/disadvantaged groups and individuals (including women, ethnic groups including pastoralists, persons with disabilities, youth, illiterate persons, etc.) for project benefits, GM, SEP (and ensure accessible disclosure)
 - include sexual exploitation and abuse/sexual harassment (SEA/SH) risk assessment and risks to children, labor practices, especially those in vulnerable situations
 - include an action plan with mitigation measures for GBV-related risks following the recommendations of the Good Practice Note for Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works for projects involving major infrastructure⁹³;
 - ensure the stakeholder engagement plan includes disadvantaged/vulnerable groups and individuals such as non-readers, women,⁹⁴ children and youth, the elderly, indigenous peoples (if applicable) and other racial, ethnic, and religious minorities, displaced persons, and persons with disabilities, and has differentiated measures to enhance participation/engagement and share in project benefits (strengthen opportunities for citizen engagement especially at local level to foster social cohesion, service delivery, and accessible GM);
 - incorporate where appropriate, traditional forms of GMs but also must also balance with ensuring accessibility/inclusion of disadvantaged and marginalized individuals and groups
 - consider access to land/natural resources especially for its potential to exacerbate tensions, deepen poverty and inequality (especially among women, certain forms of vulnerable livelihoods such as pastoralism)
 - incorporate culturally appropriate measures when assessing risks and impacts and project benefits, especially as they relate to vulnerable livelihoods, persons, and groups (include impacts on local cultures, languages and customs)
 - consider social fragility/conflict risks including poverty as a driver of fragility, inter-community dynamics between differences in access to services (i.e. water, food, land), differences in land and resource uses, livelihoods, unemployment, etc.
- h) Provide a checklist of types of impacts and corrective actions to avoid and/or mitigate them. The consultant will present, in annex, a table containing the types of impacts and the appropriate mitigation measures taking into account the typology of irrigated systems given above, and social issues/risks above. They must also propose, as far as possible, actions for the improvement of the environmental and social conditions in the areas of intervention of the project;
- i) Develop a framework for participatory monitoring and evaluation of programs as set out above to ensure effective and efficient implementation of the environmental and social issues highlighted in the ESIA;

⁹³ <http://documents.worldbank.org/curated/en/399881538336159607/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Gender-based-Violence-English.pdf>

⁹⁴ Women, and adolescent girls where feasible, should be consulted in sex-segregated groups with female facilitators to encourage open discussion on GBV risks and VULNERABILITIES in the context and how the project may have both negative and positive impacts on their lives. Only general information about trends, risks, obstacles should be sought without any questions on individual experiences of violence. Prior to consultations with women, the Consultant should identify a GBV service provider where women who have experienced violence could be referred should any of them disclose this information during or after group discussion.

- j) Describe the mechanism and institutional arrangements for the implementation of the ESIA and preparation of the ESMPs, specifying the roles and responsibilities of the agencies and all actors (central, regional/local, municipal and village) involved in the implementation;
- k) Evaluate the capacities of the governmental and local implementing agencies involved in the implementation of the ESIA and sensitization on the environmental and social issues of the project and propose appropriate measures for sensitization, institutional strengthening and/or technical capacity building different actors;⁹⁵
- l) Develop a public consultation and participation program involving all project stakeholders including key beneficiaries and those directly affected by the project, including women, youth, and vulnerable groups. A separate Stakeholder Engagement Plan needs to be prepared and it should be summarized in the ESIA annex (i.e. the SEP should not be replicated). The consultations, especially those with women, should follow ethical considerations related to GBV data collection. No GBV prevalence data or data on individual GBV incidents should be collected;
- m) Include in a matrix the dates of consultation for the ESIA/ESMP, location, summarizing key issues discussed and concerns raised by stakeholders and responses given to them (and if any follow up is needed to resolve concerns, changes to project design needed, etc.). The annex should include names of those present but in the matrix of discussions, names should be removed).
- n) Develop a monitoring and evaluation mechanism to ensure systematic and effective monitoring of the main ESIA recommendations;
- o) The preparation of standard detailed terms of reference for the strategic, regional or sectoral impact assessment to accompany the preparation of ideas for new investment projects and related technical analyses/studies.

F. OUTLINE OF THE ESIA

(a) Executive Summary

- Concisely discusses significant findings and recommended actions.

(b) Legal and Institutional Framework

- Analyzes the legal and institutional framework for the project, within which the environmental and social assessment is carried out.
- Compares the Borrower's existing environmental and social framework and the ESSs
- and identifies the gaps between them.

⁹⁵ Environmental and social assessment can provide opportunities for coordinating environmental and social-related responsibilities and actions in the host country in a way that goes beyond project boundaries/responsibilities and, as a result, where feasible should be linked to other environmental and social strategies and action plans, and free-standing projects. The ESIA for a specific project can thereby help strengthen environmental and social management capability in the country and both Borrowers and the Bank are encouraged to take advantage of opportunities to use it for that purpose. The Borrower may include components in the project to strengthen its legal or technical capacity to carry out key environmental and social assessment functions. If the Bank concludes that the Borrower has inadequate legal or technical capacity to carry out such functions, the Bank may require strengthening programs to be included as part of the project. If the project includes one or more elements of capacity strengthening, these elements will be subject to periodic monitoring and evaluation as required by ESS 1.

- Identifies and assesses the environmental and social requirements of any co-financiers.

(c) Project Description

- Concisely describes the proposed project and its geographic, environmental, social, and temporal context, including any offsite investments that may be required (e.g., dedicated pipelines, access roads, power supply, water supply, housing, and raw material and product storage facilities), as well as the project's primary suppliers.
- Through consideration of the details of the project, indicates the need for any plan to meet the requirements of national law and the ESF.
- Includes a map of sufficient detail, showing the project site and the area that may be affected by the project's direct, indirect, and cumulative impacts.

(d) Baseline Data

- Sets out in detail the baseline data that is relevant to decisions about project location, design, operation, or mitigation measures. This should include a discussion of the accuracy, reliability, and sources of the data as well as information about dates surrounding project identification, planning and implementation.
- Identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions.
- Based on current information, assesses the scope of the area to be studied and describes relevant physical, biological, and socioeconomic conditions, including any changes anticipated before the project commences.
- Takes into account current and proposed development activities within the project area but not directly connected to the project.

(e) Environmental and Social Risks and Impacts

- Takes into account all relevant environmental and social risks and impacts of the project. This will include the environmental and social risks and impacts specifically identified in the ESF and any other environmental and social risks and impacts arising as a consequence of the specific nature and context of the project.

(f) Mitigation Measures

- Identifies mitigation measures and significant residual negative impacts that cannot be mitigated and, to the extent possible, assesses the acceptability of those residual negative impacts.
- Identifies differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable.
- Assesses the feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of proposed mitigation measures, and their suitability under local conditions; and the institutional, training, and monitoring requirements for the proposed mitigation measures.
- Specifies issues that do not require further attention, providing the basis for this determination.

(g) Analysis of Alternatives

- Systematically compares feasible alternatives to the proposed project site, technology, design, and operation—including the “without project” situation—in terms of their potential environmental and social impacts.
- Assesses the alternatives' feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of alternative mitigation measures, and their suitability under local

conditions; and the institutional, training, and monitoring requirements for the alternative mitigation measures.

- For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible.

(h) Design Measures

- Sets out the basis for selecting the particular project design proposed and specifies the applicable ESHGs or if the ESHGs are determined to be inapplicable, justifies recommended emission levels and approaches to pollution prevention and abatement that are consistent with GIIP.

(i) Key Measures and Actions for the Environmental and Social Commitment Plan (ESCP)

- Summarizes key measures and actions and the timeframe required for the project to meet the requirements of the ESSs. This will be used in developing the (ESCP).

(j) Appendices

- List of the individuals or organizations that prepared or contributed to the environmental and social assessment.
- References—setting out the written materials both published and unpublished, that have been used.
- Record of meetings, consultations, and surveys with stakeholders, including those with affected people and other interested parties. The record specifies the means of such stakeholder engagement that were used to obtain the views of affected people and other interested parties.
- Tables presenting the relevant data referred to or summarized in the main text.
- List of associated reports or plans.

ANNEX 7: INDICATIVE OUTLINE OF AN ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

An ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures. The Borrower will:

- i. identify the set of responses to potentially adverse impacts;
- ii. determine requirements for ensuring that those responses are made effectively and in a timely manner; and
- iii. describe the means for meeting those requirements.

Depending on the project, an ESMP may be prepared as a stand-alone document⁹⁶ or the content may be incorporated directly into the ESCP. The content of the ESMP will include the following:

(a) *Mitigation*

- The ESMP identifies measures and actions in accordance with the mitigation hierarchy that reduce potentially adverse environmental and social impacts to acceptable levels.
- The plan will include compensatory measures, if applicable. Specifically, the ESMP:
 - i. identifies and summarizes all anticipated adverse environmental and social impacts (including those involving Indigenous Peoples, involuntary resettlement, labor and working conditions, SEA/SH, stakeholder engagement and grievance resolution, etc.)
 - ii. describes—with technical details—each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate
 - iii. estimates any potential environmental and social impacts of these measures; and
 - iv. considers, and is consistent with, other mitigation plans required for the project (e.g., for involuntary resettlement, indigenous peoples, or cultural heritage).

(b) *Monitoring*

- The ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP.⁹⁷
- Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to: (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

⁹⁶ This may be particularly relevant where the Borrower is engaging contractors, and the ESMP sets out the requirements to be followed by contractors. In this case, the ESMP should be incorporated as part of the contract between the Borrower and the contractor, together with appropriate monitoring and enforcement provisions.

⁹⁷ Monitoring during project implementation provides information about key environmental and social aspects of the project, particularly the environmental and social impacts of the project and the effectiveness of mitigation measures. Such information enables the Borrower and the Bank to evaluate the success of mitigation as part of project supervision and allows corrective action to be taken when needed.

(c) Capacity Development and Training

- To support timely and effective implementation of environmental and social project components and mitigation measures, the ESMP draws on the environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and ministry level.
- Specifically, the ESMP provides a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training).
- To strengthen environmental and social management capability in the agencies responsible for implementation, the ESMP recommends the establishment or expansion of the parties responsible, the training of staff and any additional measures that may be necessary to support implementation of mitigation measures and any other recommendations of the environmental and social assessment.

(d) Implementation Schedule and Cost Estimates

- For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables.

(e) Integration of ESMP with Project

- The Borrower's decision to proceed with a project, and the Bank's decision to support it, are predicated in part on the expectation that the ESMP (either stand alone or as incorporated into the ESCP) will be executed effectively. Consequently, each of the measures and actions to be implemented will be clearly specified, including the individual mitigation and monitoring measures and actions and the institutional responsibilities relating to each, and the costs of so doing will be integrated into the project's overall planning, design, budget, and implementation.

ANNEX 8: OUTLINE OF A CONTRACTOR ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (C-ESMP)

(The ESMP-C will be prepared by each contractor in charge of a site of a certain size (number of workers, scope, and duration of work, etc.). A simplified outline will be used for minor work by small construction companies).

1. ENVIRONMENTAL AND SOCIAL POLICY OF THE CONTRACTOR

2. OBJECTIVES OF THE C-ESMP

- 2.1 Preparation of the C-ESMP
- 2.2 Contractor's Responsibilities
- 2.3 Prime Contractor's Responsibilities
- 2.4 Monitoring
- 2.5 Implementing and Updating the C-ESMP

3. ENVIRONMENTAL MANAGEMENT SYSTEM

- 3.1 Responsibilities
- 3.2 Subcontracting
- 3.3 EHS Planning Document
- 3.4 Application for site approval
- 3.5 Non-compliance management
- 3.5 Human resources
- 3.6 Inspections
- 3.7 Reporting
- 3.8 Incident Reporting
- 3.9 Internal regulations
- 3.10 EHHS training
- 3.11 Standards

4. PROTECTION OF THE ENVIRONMENT

- 4.1 Protection of adjacent areas
- 4.2 Selection of Borrow Areas, Cuttings and Site Access
- 4.3 Effluents
- 4.4 Water Management
- 4.5 Watercourses
- 4.6 Air Emissions and Dust

- 4.7 Noise and vibration
- 4.8 Waste Management
- 4.9 Vegetation clearing
- 4.10 Erosion and Sedimentation
- 4.11 Reclamation
- 4.12 Documentation of Site Conditions
- 5. OCCUPATIONAL HEALTH AND SAFETY (OHS)
 - 5.1 Safety and health plan
 - 5.2 Weekly and daily meetings
 - 5.3 Equipment and operating standards
 - 5.4 Work permits
 - 5.5 Equipment and personal protection
 - 5.6 Hazardous materials
 - 5.7 Emergency Planning
 - 5.8 Fitness for Work
 - 5.9 First Aid
 - 5.10 Covid-19 Plan
 - 5.11 First Aid Kits
 - 5.12 Emergency Medical Evacuation
 - 5.13 Access to care
 - 5.14 Medical follow-up
 - 5.16 Hygiene
 - 5.17 Sexually Transmitted Diseases and Infections
 - 5.18 Substance abuse
 - 5.19 SEA/SH Prevention and Response Action Plan
- 6. LOCAL WORKFORCE AND COMMUNITY RELATIONS
 - 6.1 Local recruitment including transparency in recruiting, opportunities for men and women, prohibition against child labor/forced labor
 - 6.4 Damage to persons and property
 - 6.5 Land occupation or acquisition
 - 6.6 Circulation and Management of Rolling Stock
- 7. ADDITIONAL AND SPECIFIC MEASURES

7.1 Safety in risk areas

7.2 Grievance Mechanism and processes for workers, including SEA/SH cases

7.3 Relations with the communities along the river

7.4 Complaint resolution mechanism

7.5 Gender

7.6 Procedure in case of accidental discovery of remains

7.7 Internal audits

ANNEXES

ANNEX 1: Mitigation Measures: Pre-construction and Construction

ANNEX 2: Mitigation Measures: Operations Phase

ANNEX 3: Mitigation Monitoring Responsibilities

ANNEX 4: GM monitoring for non-SEA/SH complaints

ANNEX 5: How SEA/SH complaints will be handled and SEA/SH risks will be mitigated

ANNEX 9: PROTOCOL FOR COVID-19 TRANSMISSION PREVENTIVE MEASURES

Introduction

The prevalence of the coronavirus disease (COVID-19) was declared a pandemic by the World Health Organization (WHO) in March 2020 and is currently ongoing. While the pandemic has placed enormous pressure on health systems as they attempt to cope with the growing demand for services, it has had a significant toll on human health and morbidity and mortality. Various measures have been implemented to help curb its spread such as "social distancing", masking, school and work office closures, working/schooling from home, and measures to curb physical proximity for trade, border crossing/international travel, and marketing activities.

Ministry of Health guidelines are in line with the WHO "COVID-19 Strategic Preparedness and Response Plan Operational Planning Guidelines to Support Country Preparedness and Response" (2020). These guidelines describe the following approach in their Risk Communication and Community Engagement.

It will lay the foundation for the project's stakeholder engagement and civil works implementation approach. The project will also build on other recently available resources to carry out civil works implementation in the context of COVID-19, including the World Bank's *Technical note: Public Consultations and Stakeholder Engagement in World Bank Supported Operations in the Event of Constraints on Holding Public Meetings* (March 20, 2020). These guidelines will be taken into consideration for civil works to protect workers, affected communities, and project staff.

In The Gambia, the first cases of COVID-19 were reported in March 2020, and following a presidential address on March 17, 2020, The Gambia closed all schools and educational institutions to protect children and communities to control the spread of the virus.

Given the social distancing advocated to stop or reduce the transmission of COVID-19, the project decided to develop this protocol to safely implement stakeholder outreach and implement civil works.

1- Methodology

To meet best practices, the project will apply the following principles for stakeholder engagement and civil works implementation:

- **Open and life-cycle approach:** public consultations for the project will be held throughout the lifecycle, conducted in an open manner, without external manipulation, interference, coercion, or intimidation
- **Informed participation and feedback:** information will be provided to all stakeholders and widely disseminated in an appropriate format; opportunities are provided to communicate stakeholder feedback, to analyze and respond to comments and concerns
- **Inclusiveness and sensitivity:** Stakeholder identification are undertaken to support better communications and build effective relationships. The process for participation in projects is inclusive. All stakeholders are always encouraged to participate in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholder needs is the key principle underlying the choice of engagement methods. Particular attention should be paid to vulnerable groups, especially women, youth, the disabled, the elderly, and the cultural sensitivities of various ethnic groups

- **Flexibility:** if social distancing inhibits traditional forms of engagement, the methodology should be adaptable to other forms of engagement, including various forms of Internet, radio, or TV communication.
- **Workers:** To avoid or reduce the risk of contagion or spread of COVID-19, all workers will wear their masks and goggles and social distance will be closely monitored by all workers on site. The same measures will be followed when interacting with the local communities.
- **Affected Parties** - individuals, groups, and other entities within the project's area of influence (AOI) that are directly influenced (actually or potentially) by the project and/or have been identified as most likely to change associated with the project, and that need to be closely involved in identifying impacts and their significance, as well as in deciding on mitigation and management measures.
- **Vulnerable Groups** - people who may be disproportionately affected or more disadvantaged by the project than any other group because of their vulnerable status, and who may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.

Disadvantaged / vulnerable individuals or groups

It is particularly important to understand whether project impacts may disproportionately affect disadvantaged or vulnerable individuals or groups, who often have no voice in voicing their concerns or understanding the impacts of a project, and to ensure that stakeholder awareness and engagement of vulnerable individuals or groups on infectious diseases and medical treatments in particular, be tailored to take into account these groups or individuals' particular sensitivities, concerns, and cultural sensitivities, and to ensure full understanding of the project's activities and benefits. Vulnerability may arise from the individual's origin, gender, age, health status, economic deficiency and financial insecurity, disadvantaged status in the community (e.g., minorities or marginalized groups), dependence on other individuals or natural resources, etc. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance to facilitate their participation in project-related decision-making so that their awareness and contribution to the overall process is commensurate with that of other stakeholders.

Within the project area, most particularly within the TDA in the greater Banjul, vulnerable or disadvantaged groups may include and are not limited to female heads of households, sexual minorities, elders, youth, people renting land, especially women, etc. Vulnerable groups within the communities affected by the project will be consulted through dedicated means, as appropriate. A description of the engagement methods that will be undertaken by the project is provided in the following sections.

1- Strategy

The Gambian tourism project in collaboration with stakeholders, including the contractor, will identify and review all planned project activities requiring stakeholder engagement, public consultation, and implementation of civil works.

The next step will be to assess the objectives, location, and size of the proposed activities, with an emphasis on a strategy to limit contact and gatherings as much as possible.

Continue the strategy by assessing the level of risk of spread with these commitments and how to align with the restrictions in place at the national level.

Identify critical activities for which consultations cannot be postponed without significant impact on the project timeline. At the end of this exercise, consider viable ways to obtain stakeholder input and commitment.

Identify how planned civil engineering activities may involve gathering and how to enforce social distancing and strict adherence to PPE to avoid contagion such as mask, goggles, hand sanitizers... etc. Before the actual consultation and civil works begin, the project will recommend that the contractor begin with an initial field visit to identify the affected communities.

The objective of this assignment will be to:

- Identification of corridor boundaries, sites and affected communities
- The contractor and project will also assess media coverage to see which media channels are best suited to disseminate the preventive measures
- Depending on the areas affected, the contractor will examine the best telecommunication coverage to decide which one to use to communicate with the communities
- Traditional communication channels will also be assessed to see how effective they can be in conveying relevant information to stakeholders in mosques, churches, griots
- Based on the results of this first field visit mission, the contractor with CEP will be able to start site preparation and sensitization of affected communities on the ESMP, GM and COVID-19 measures recommended by WHO and the Ministry of Health.
- For this second phase, the project will implement specific measures to mitigate the risk of COVID-19 transmission.
- A precautionary approach will be taken to the consultation process and implementation of civil works to prevent infection and/or contagion, given the highly infectious nature of COVID-19. The following are some considerations for selecting communication channels and behavior for the safe implementation of civil works, given the current COVID-19 situation:
 - Avoid public gatherings (taking into account national restrictions or advisories), including public hearings, workshops, community meetings and at work sites
 - Since smaller meetings are allowed (five people with a distance of 1.5 m between participants), consultations will be conducted in small groups, similar to focus group meetings. Efforts will be made to conduct meetings by telephone or, if possible, online, to reduce the risk of contagion or contamination
 - Use communication channels (TV, newspapers, radio, dedicated phone lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Communication channels can also be very effective in conveying relevant information to stakeholders and allowing them to provide feedback and suggestions.
 - Where direct engagement with project-affected individuals or beneficiaries is necessary, identify channels for direct communication with each affected household via a contextual combination of email messages, online platforms, dedicated phone lines with skilled operators
 - Each of the proposed engagement channels will clearly specify in the FMP how comments and suggestions can be provided by stakeholders
 - For the implementation of the civil works, the contractor will delineate the site and provide signs showing the measures to be strictly followed by all those on site
 - All workers will always wear their PPE and masks, goggles and hand sanitizers will be available in all strategic areas of the site
 - Equipment to measure the temperature of all persons entering the work sites shall be available. At each site, the contractor will have two thermometers

- The contact of the local COVID-19 committee of the Ministry of Health will be communicated to all workers, the contact number will be posted on site. The project will work closely with this committee to implement the project in a safe manner

In line with the precautionary approach above, different engagement methods are proposed covering different stakeholder needs as below:

- Consultation meetings
- Focus group meetings
- Individual interview
- Public notices
- Electronic publications and press releases on the NAWEC website, NAWEC West Coast time
- Telephone/mobile interview via
 - Text messages
 - Social media
- Wearing masks
- Wearing glasses
- Availability of hand sanitizers
- Thermometer

2- Management of COVID-19 during civil works

A special COVID-19 induction will be conducted for each employee before they can begin work. Female employees should also be independently consulted by a facilitator in safe and supportive environments to ensure that the impact of COVID19 mitigation measures on women is properly addressed. This induction will be entirely dedicated to COVID-19:

- How it spreads
- How to protect yourself (including washing protocols)
- How to properly use PPE (mask and gloves) and the requirements for wearing PPE
- Understand the symptoms and what to do if they occur
- Understanding the impact of COVID-19 on vulnerable groups (who are vulnerable)

This induction will be renewed for all workers each month. Each day before the beginning of the activities, a specific briefing will be carried out by the Site Manager who is the team leader.

The site manager will address the following points:

- Reminder of the context and the need to respect the rules
- Reminder of barrier measures: how to cough, hand hygiene (basins and soap will always be available on site), social distancing and wearing a mask
- Taking the temperature every morning before the start of the work
- Reminder of the exceptional measures applicable to the activities concerned
- Reminder of the main symptoms of COVID-19
- Reminder of the Hotline: **COVID-19**

3- Monitoring of symptoms and other hygiene and mitigation protocols:

Workers will be monitored for symptoms associated with COVID-19. Each worker shall monitor for symptoms for themselves and their co-workers and immediately notify their supervisor if they are not feeling well or suspect a co-worker is not feeling well. If symptoms appear during the night, the employee shall inform his supervisor and not report to the work site. The same procedure will then be followed as for employees who are present in the morning with a fever.

The contractor will provide transportation to the health centers by liaising with the COVID-19 1052 hotline in the event that health center ambulances are not available.

Personal Protective Equipment (PPE) must be clean and for individual use only (not shared, traded, or loaned between employees). Social barrier/distance from COVID-19 must be enforced during breaks and meals. Drinking water supplies for staff, such as a cup or water bottle, must be available to all workers and must not be shared between workers. Anyone who is not an employee of the contractor, or its service providers is a visitor. Any visitor wishing to access the site must undergo the same COVID-19 mitigation controls as employees.

The cleanliness, including sanitation, of staff reception facilities must be maintained regularly throughout the day. Any waste that may be infected must be managed to avoid the risk of contamination.

The contractor will mark out the site and provide signs showing the steps to be strictly followed by all on site.

Workers should always wear PPE gears, masks, goggles and maintain regular hand cleanliness. Hand sanitizers will be available in all strategic areas of the site.

Equipment to measure the temperature of all persons entering the work sites shall be available at each checking point for systematic filtration. At each site, the contractor will have two thermometers, regularly cleaned to prevent contamination of each site. Temperature taking and management of thermometers shall be the responsibility of the ESHS Manager.

Contact information for the local COVID-19 committee (established by the Department of Health under the direction of the Governor with all relevant stakeholders in each region) **COVID-19 1025 Hotline** will be provided to all workers. The contact number will be posted on site. The project will work closely with this committee to implement the project safely.

ANNEX 10: CHANCE FIND PROCEDURES

1. Discovery of cultural heritage

These provisions will be communicated to all workers at the beginning of the project (onboarding, security) and to new stakeholders. They will also be the subject of minutes (quarter-hour) safety on all our sites. The declaration is made by the contractor/subcontractor or the Environment Field Manager. It is brought to the attention of the Project Owner, the Village Chief, the local authority, and the National Centre for Arts and Culture (NCAC).

2. Chance Find Management Procedure

- **Suspension of work:** when monuments, ruins, substructions, mosaics, elements of ancient canalization, remains of dwelling or ancient burial, inscriptions or generally objects that may be of interest to paleontology, prehistory, history, art, archaeology or numismatics, are updated as a result of work, the Contractor will immediately interrupt the work, notify the owner's engineer which must immediately the administrative authority of the place of discovery that notifies the NCAC without delay.
- **Delimitation of the discovery site:** The Entrepreneur will be required to delimit and secure a perimeter of fifty (50) meters around the discovered property. It will limit access to this perimeter, and work can only resume in this perimeter after authorization from the NCAC.
- **Securing the site to avoid any damage or loss of removable objects:** In case of discovery of removable antiques or sensitive remains, a night guard will be present until the responsible local authorities and the Ministry of Culture take over.

3. Chance finds report

Within 24 hours of a chance discovery, the Contractor will draw up a report providing the following information:

- The names and contact details of the declarant
- The place and cadastral references
- The date and place of the discovery
- The nature and circumstances of the discovery
- Description and state of conservation of the remains
- Location of the discovery (Geographical coordinates of the site)
- Temporary protection measures put in place.

Once the discovery has been made, and the conservation and protection measures have been implemented, the Site Manager or the Environment, Health and Safety Manager is required to immediately declare the finding to the authorities concerned.

Internally (construction site), the find will be recorded in the site register and communicated verbally to the site engineer. Externally, a written report will be sent via the owner's engineer and the Project Owner, to the Governor and the Ministry of Tourism and Culture, the National Council of Arts and Culture, and the Village Chief. A copy of this report will be stored in the ESMP Works binder.

4. Arrival of cultural services and measures taken:

The NCAC will send a representative to the place of discovery within 2 days of notification and determine the measures to be taken which must be taken within seven (7) days, including:

- Removal of cultural heritage deemed important and continuation of work on the site of the discovery, Continuation of work within a specified radius around the discovery site
- Enlargement or reduction of the area delimited by the contractor; Etc.

If necessary, the PIU will support the NCAC's agents to ensure they arrive on time at the place of discovery. They will carry out a preliminary evaluation with the support of relevant professionals (within 72 hours). The significance and importance of the results must be assessed according to the various criteria relevant to cultural heritage; these include aesthetics, historical, scientific or research, social and economic values.

Decisions on how to manage the finding of discoveries must be made by the responsible authorities of the Ministry of Tourism and Culture (MoTC). This could include conservation, preservation, restoration, or recovery.

The implementation of the decision concerning the management of the finding of discoveries must be communicated in writing by the MoTC.

If the NCAC does not send a representative within 2 days, the owner's engineer may extend this period for an additional 2 days.

Under no circumstances should the PIU take a decision without receiving written advice from the NCAC. The additional work will be charged to the contract but the contractor will not be able to claim compensation for the period of suspension of the work.

ANNEX 11: SUMMARY OF PUBLIC CONSULTATION AND STAKEHOLDER ENGAGEMENT/INCLUSION

| Stakeholders | Views of stakeholders consulted | Major risks identified by stakeholders | Suggestions/Recommendations |
|---|--|--|---|
| National Environment Agency (NEA) 28/02/2022 | <ul style="list-style-type: none"> The Agency coordinates environmental activities through environmental and social impact assessments for other stakeholders, such as geology, parks, and wildlife It monitors the Regulation of Environmental Impact Assessment It ensures the protection and preservation of the environment, coastal areas, and its regions It is also in charge of issuing operating licenses to companies; | <ul style="list-style-type: none"> Noise and movement of heavy equipment during construction at tourist sites may reduce tourist attraction Lack of understanding of environmental impact assessment; government perceived it as a waste of resources Lack of coordination among stakeholders leading to conflicts of interest Non-compliance with EIA protocols by the project | <ul style="list-style-type: none"> Carry out the studies in accordance with the ESIA guidelines and procedures Conduct proper stakeholder mapping and analysis Designate the right institution with the mandate and technical know-how to take the lead Adopt the use of drones for coastal zone monitoring Conduct exchange visits to enable innovation and learning of new cutting-edge technologies |
| Minister of tourism and culture 21/02/2022 | <ul style="list-style-type: none"> The Minister in person and his team welcomed the Project, which he believes will certainly address the many challenges facing the tourism sector, which has been weakened by COVID-19 They insisted on the need to be part of an Inclusive Dynamics by consulting all stakeholders in the tourism sector and related sectors such as environment, gender, trade etc. | <ul style="list-style-type: none"> Congestion of some businesses located along the estuary during works related to the protection of erosion zones Coastal erosion and impact on commercial and tourist activities Risks of tensions between actors involved in the tourism sector and whose interests are often divergent Risks of collecting erroneous data to guide decision –making about the project due to political conflicts and positioning of certain actors | <ul style="list-style-type: none"> As part of the project, rehabilitate and/or build some infrastructures Always refer to the Ministry of Tourism (the leading institution) for a better connectedness with all stakeholders Focus on the sites most affected by erosions Integrate the socio-economic support of tourism actors, especially the most vulnerable, such as young men and women sex workers; |
| Gambian Tourism Board (GTB) 22/02/2022 | <ul style="list-style-type: none"> As key players in the tourism sector, we welcome the Project which can solve problems that the sector has been facing for a long time It is important to establish from the beginning a sincere and constant dialogue with the various stakeholders because there are latent conflicts | <ul style="list-style-type: none"> Weak communication and synergy between tourism stakeholders Existence of a multitude of tourist sites affected by environmental problems related to both climate change (coastal erosion) and | <ul style="list-style-type: none"> Carry out a major diagnostic study of the sector in a holistic perspective with a view to drawing up a tourism development plan Promote ecotourism and integrated tourism Review the key to the distribution of resources from the sector between the different actors |

| Stakeholders | Views of stakeholders consulted | Major risks identified by stakeholders | Suggestions/Recommendations |
|---|--|---|--|
| | <p>between them especially those who are at the level of tourist areas</p> <ul style="list-style-type: none"> • Low level of integration of communities • Lack of study and therefore reliable data on the tourism sector and low level of information literacy; | <p>anthropogenic pressure (fish remains dumped on the beach, pollution)</p> <ul style="list-style-type: none"> • Risks of land conflicts due to problems of spatial governance and land speculation; | <ul style="list-style-type: none"> • Strengthen the capacities of actors • Decentralize the management policy of the sector by setting up regional offices that are closer to the communities and that will work closely with them. |
| <p>Abuko Reserve 23/02/2022</p> | <ul style="list-style-type: none"> • We are very happy to be identified as stakeholders in the project • It is a project that can help preserve the existing biodiversity in the reserve (more than 600 species); | <ul style="list-style-type: none"> • Impacts of runoff on both fauna and flora resources • Disturbance of animals by sports activities (a football field located in the site) • A loss in intensity of the reserve's activities due to lack of financial resources • Anthropogenic pressures (deadwood loggers); • Failure to meet the water needs of the Reserve and exposure of animals; | <ul style="list-style-type: none"> • Design a communication plan with the populations to raise their awareness on the importance of protecting the reserve • Support the reserve in improving access to water |
| <p>Manager of Bijilo Park 23/02/2022</p> | <ul style="list-style-type: none"> • It is important to send us correspondence through the hierarchical channel to so we can better provide the information you need • We are very interested in the Project which can accompany us on many levels • Our park is one of the few in Africa that is home to all categories of monkeys; so, it interests tourists and must therefore be taken into account in the project; | <ul style="list-style-type: none"> • Low protection of the Park • Threat to biodiversity • Lack of water infrastructure and poor access to water • Exposure of monkeys to capture and accidents; | <ul style="list-style-type: none"> • Support us in the development of access roads to improve pedestrian trails in the park • Construction of water supply infrastructures to address the Park's water needs • Support for a sound inventory of the Park's species • Support for the introduction of new species into the park (antelopes) • Installation of signage and orientation maps in the park • Development of infrastructure in the park (restaurants, toilets, training rooms) • Accompaniment in garbage cans to facilitate the recycling of solid waste in the park |
| <p>Manager of the Gambia River Park From 23/02/2022</p> | <ul style="list-style-type: none"> • -Are happy with the project because we are dragging here problems that Covid 19 has brought | <ul style="list-style-type: none"> • Exposure of chimpanzees to contamination by visitors (70 chimpanzees were seriously ill and there was reason to believe that it was related to Covid 19) | <ul style="list-style-type: none"> • The project should help us to organize awareness-raising with communities and other tourism stakeholders who can serve as relays |

| Stakeholders | Views of stakeholders consulted | Major risks identified by stakeholders | Suggestions/Recommendations |
|--|--|--|---|
| | <ul style="list-style-type: none"> The project can allow us to better organize ourselves with the actors (State and communities) to better preserve the Park We are convinced that this is the best place you can be in The Gambia and therefore any tourism development project must integrate it | <ul style="list-style-type: none"> The site is also exposed to large boats There are protocols that we share with tourists (the safety distance of 50 meters for example) but some do not respect them People's fear of going to the island due to lack of communication means Overexploitation of fisheries resources | <ul style="list-style-type: none"> in terms of information and awareness of tourists who visit the site We need the project to accompany us in the reinforcement of our equipment in particular through the provision of more modern boats Support in securing the island |
| Museum of slavery 24/02/2022 | <ul style="list-style-type: none"> The project is for us a good thing for tourism We have here all our infrastructures in an advanced state of deterioration (the wall, the shed, the exhibition rooms, the roofs etc.) and we hope that the project can help to rehabilitate them; | <ul style="list-style-type: none"> Risk of collapse of buildings Risk of damage to documents and objects due to the poor condition of the roofs; | <ul style="list-style-type: none"> Rehabilitate the buildings and the wall of the museum and provide social amenities (toilet, kitchen, meeting and training room, offices etc.) Strengthen the technical capacity of the agents working in the museum; |
| Juffureh Rest House 24/02/2022 | <ul style="list-style-type: none"> The Juffureh Rest house served as a place of accommodation for mainly Western tourists, it had later become a place for music learning. The site needs to be rehabilitated and revitalized | <ul style="list-style-type: none"> Risk of building collapse | <ul style="list-style-type: none"> Support the rehabilitation of the site by positioning it as a local welcome center for tourists; |
| San Domingo Reserve 24/02/2022 | <ul style="list-style-type: none"> This site has a great historical significance and should be further valued to be more attractive to tourists because it served as a place of transit of slaves before the transport to the island. Also, it houses a cemetery where are buried the first explorers arrived on the lands of the Gambia. | <ul style="list-style-type: none"> Total collapse of buildings Insecurity of the site due to lack of fence Lack of equipment for site management; | <ul style="list-style-type: none"> Build a connecting road from the reserve to the island (about 500 meters) Provide reserve staff with equipment and cleaning materials |
| Kunta Kinteh Island 23/02/2022 | <ul style="list-style-type: none"> The project is timely because the island is about to disappear completely. They hope that the project will provide an urgent response to stop the harmful progress of the sea towards the island; address it through adaptation solutions. | <ul style="list-style-type: none"> Threat of disappearance of the island, which has already lost 5/6th of its area Equipment stealing from the island Collapse of buildings Disappearance of plant species (3 large baobabs have been washed away) | <ul style="list-style-type: none"> Provide in the project an emergency intervention to stop erosion and save the island Upstream of the island (embarkation area) help communities develop economic activities Set up an organized tourist circuit from the ferry to the island through the various museums and reserves in the area |

| Stakeholders | Views of stakeholders consulted | Major risks identified by stakeholders | Suggestions/Recommendations |
|---|--|---|---|
| | | | <ul style="list-style-type: none"> Provide staff with a boat and an emergency medical device to ensure evacuation in case of danger, accident, malaise etc.) |
| Minister of Environment, Climate change and Natural resources 25/02/2022 | <ul style="list-style-type: none"> The Ministry of the Environment is very interested in the project, one of the components of which concerns erosion zones Even other sites that are not affected by erosion, including reserved areas and parks, are often the scene of multiple environmental hazards and the project could be an opportunity to resolve these issues if not completely, at least sustainably Since there are a multitude of agencies and departments involved in the matter, it would be better to move towards a more technical meeting that will bring them all together. | <ul style="list-style-type: none"> Risks of taking actions that may increase Coastal erosion Pollution in tourist areas (fish remains, poor solid waste management) during the operations phase Problem of coordination of interventions between the different institutions and agencies concerned with tourism matters; | <ul style="list-style-type: none"> Ensure adequate consultations among key stakeholders involved in coastal zone management Organize a meeting to be attended by all units and departments of the Ministry for in-depth discussions on certain issues; |
| Minister of Gender, Children and Social Welfare 25/02/2022 | <ul style="list-style-type: none"> The Ministry is committed to defending the rights of women, children, and all persons in vulnerable situations (the disabled, poor families, etc.). We have been working to reorganize the Department since its creation and attach great importance to staff capacity building. In that regard we are delighted and hope that the project can accompany us to boost our funding for women's entrepreneurship | <ul style="list-style-type: none"> Risks of violence against sex workers Risk of child labor at project work sites/ tourist destinations Degradation of the country's image due to sex tourism/exploitation and sexual abuse of children; | <ul style="list-style-type: none"> Strict application of Codes of Conduct Close monitoring of the movement of children around project sites or tourist destination. Supporting young girls and boys sex workers to find alternative activities so they can quit sex work |
| Sex workers 24/02/2022 | <ul style="list-style-type: none"> Poverty was a push factor to do this work, lack of educational/job opportunities They would prefer not to do this work and want alternatives Are taken advantage of by clients, sometimes they are not paid, or clients will not honor the agreed price and will halve the payment Sometimes unjustly accused of stealing client's possessions | <ul style="list-style-type: none"> Possible increase (or remain the same) in sex tourism if systemic changes are made to the tourism sector Child trafficking/exploitation/abuse will also increase; | <ul style="list-style-type: none"> Support sex workers to go into business and get better jobs Provide scholarships to enable those interested to return to school or vocational training institutes for employment opportunities Support women workers through the establishment of a reintegration and counseling center |

| Stakeholders | Views of stakeholders consulted | Major risks identified by stakeholders | Suggestions/Recommendations |
|---|--|--|--|
| | <ul style="list-style-type: none"> ▪ Experience sexual harassment, exploitation, violence including raped, abuse ▪ Lack of protection and security by law ▪ COVID-19 restrictions meant they were unable to have access to livelihoods, poverty worsened | | <ul style="list-style-type: none"> ▪ Provide health insurance for free health care ▪ Creating a law for sex workers to have freedom of association, security and protection ▪ Provision of registration and identification cards to commercials their business; |
| Department of Lands | <ul style="list-style-type: none"> ▪ Provision of lands ▪ Identification and allocation of sites ideal for tourism development ▪ Provision of land management plan | <ul style="list-style-type: none"> ▪ Encroachment of people by building structures on tourist development areas ▪ Failure to pay compensation for land acquired by the project by government ▪ Failure to properly prepare resettlement if people have to be physically relocate | <ul style="list-style-type: none"> ▪ Ensure proper procedures are followed in compulsory land acquisition ▪ Ensure that the necessary compensation is paid for all lost assets to the project. ▪ Preservation and protect of reserve lands for designated purposes ▪ A provision of a cadastral mapping system for easy identification of all sites |
| The Gambia Chamber of Commerce and Industry (GCCl), The Gambia Youth and Chamber of Commerce (GYCC), The Gambia Women Chamber of Commerce (GWCC) | <ul style="list-style-type: none"> ▪ Advocates activities for private sector ▪ Helping in access to market e.g., organizing trade fairs ▪ Trade facilitation by providing trade information internal and globally ▪ Issuing of certificate of origin for exportation of goods ▪ ECOWAS interstate transits ▪ Business development services | <ul style="list-style-type: none"> ▪ Obtaining loans from commercial banks by small business ▪ Access to title deeds for land to start a business ▪ Cash injected tourism ▪ High taxation rates are also a bottle neck or improvements ▪ All-inclusive package killing small business ▪ Frequent electricity power cuts as business can't afford ▪ Multiplicity of taxes ▪ The need to modernize sea and internet communication to ease work and safe time infrastructure to transport by sea from the north to the south of the country due to poor ferry service | <ul style="list-style-type: none"> ▪ Eradication of airport tax and high-ticket rates ▪ 30 to 40% representation in parliament to represent women ▪ Policy alignment with other stakeholder for e.g., GCCl (Gambia Chamber of Commerce and Industry) with department of tourism ▪ Provision of labeling, testing facilities or lab centers ▪ Entrepreneurs to form as cooperatives ▪ All hotels to participate in trade fares ▪ Creation of linkages between SMES ▪ Organized high level forums for businesses Capacity for business support organizations ▪ Involvement of tourist's products in trade fares ▪ Startup act or laws ▪ The advocating of under conferences on broad band internet connection which is very expensive |

| Stakeholders | Views of stakeholders consulted | Major risks identified by stakeholders | Suggestions/Recommendations |
|---|---|--|---|
| | | | <ul style="list-style-type: none"> • Adequate financial supports • Low taxation • Provision of labelling and packaging industries |
| Sex workers (including same sex workers) | <ul style="list-style-type: none"> • Sex work • No personal identification was obtained to protect anonymity. | <ul style="list-style-type: none"> • Labor influx which may increase SEA/HS • Increased Stigmatization and victimization of members • Lack of protection and security by the law • With COVID-19 restrictions they were unable to work | <ul style="list-style-type: none"> • Enforce the provisions of the SEA Prevent and Response Action Plan. • Support relocation and resettlement program to third countries all frightened, unsecure and threaten members |

Meeting with associations: Q/A

Date: Feb 25, 2022

| Questions | Juice Pressers | Tour guides (Freelance) | Ground Tour Operators (Category B) |
|--|---|--|---|
| How many members does your association have? (Male number) and (female number)? | <ul style="list-style-type: none"> • 285 • Female 5 • Male 280 | <ul style="list-style-type: none"> • 38 • Female 1 • Male 37 | <ul style="list-style-type: none"> • 15 • Female 2 • Male 13 |
| What are the main activities of your association? | <ul style="list-style-type: none"> • Processing and selling of natural juice | <ul style="list-style-type: none"> • Guiding tourists and providing excursions • Putting information to the tourists about the historical facts and attractions | <ul style="list-style-type: none"> • Excursion services • Provision of transportation services • Hotel arrangement • Equipment hiring (boats and cars) |
| What are the difficulties of your associations or members of the association in their activity? | <ul style="list-style-type: none"> • No renovation of shops, stalls, cantons after tourism session • No physical market to sell our produce • No electricity • No running waters • No toilet and sanitary facilities | <ul style="list-style-type: none"> • Financial constrains • Interference from other unregistered players (bumsters, drivers) • Loss of income due to COVID-19 • Demolition and relocation of office • Difficulties in ferry crossing points | <ul style="list-style-type: none"> • High rental fees • High taxation • Interference from unregistered businesses |
| What are your main expectations of the tourism project? | <ul style="list-style-type: none"> • Provision of kiosks, tables, and stalls • Storage facilities • Clean running Water • Toilet facilities | <ul style="list-style-type: none"> • new sites to visit • preservation of the historical, cultural, and natural sites • access to financial supports | <ul style="list-style-type: none"> • Financial support • more standard to improve of service • reduction of high rate • improvement on website • to take part in international trade fares |
| What is your capacity building needs to improve your business | <ul style="list-style-type: none"> • website to advertise our products • skill training to improve our processing | <ul style="list-style-type: none"> • need trading • to get more information about update of new model tourism | <ul style="list-style-type: none"> • training of staff • capacity to carter more tourists |

| Questions | Juice Pressers | Tour guides (Freelance) | Ground Tour Operators (Category B) |
|---|---|--|--|
| What could be the risks of this project for the tourism sector or for local communities? | <ul style="list-style-type: none"> ▪ tourism paying a full package to hotel | <ul style="list-style-type: none"> ▪ No risk | <ul style="list-style-type: none"> ▪ More unfair competition ▪ Conflicts of interest among similar associations |
| What are your main recommendations for a good implementation of the project | <ul style="list-style-type: none"> ▪ All year-round tourism ▪ Finance | <ul style="list-style-type: none"> ▪ Financial support due to covid 19 ▪ Training of personals ▪ All year-round tourism | <ul style="list-style-type: none"> ▪ Digital advertisement ▪ To be able to give more quality service ▪ Access to financial supports |

Meeting with associations: Q/A

Date: Feb 23, 2022

| Questions | Bird watchers | Tourism and travel Category A | Tourist taxi drivers |
|--|--|--|--|
| How many members does your association have? (men/women) | <ul style="list-style-type: none"> 68 Women 5 Men 63 | <ul style="list-style-type: none"> 14 | <ul style="list-style-type: none"> 2000 No female |
| What are the main activities of your association? | <ul style="list-style-type: none"> Tourist guide Conservation Promotion of bird watching through social media Organizing field trip for school children Participation in international trade fares | <ul style="list-style-type: none"> Ground operation Tour operation Hotel and lodges Equipment hiring Boat and laundry services Restaurant and beach bars services | <ul style="list-style-type: none"> Transportation Dispatching Tour guiding |
| What are the difficulties of your associations or members of the association in their activity? | <ul style="list-style-type: none"> Lack of financial support from the government Shortage of area for bird watching activities due to deforestation Settlements and unregulated bird hunting- constrain with bureaucracy to promote and extend activities Lack of marketing internationally | <ul style="list-style-type: none"> . finical constrains high interest rates on loans/from local banks lack of support from the government constrains in marketing of the service internationally | <ul style="list-style-type: none"> Private drivers' interference Challenges in the ferry crossing All-inclusive package from hotel owners |
| What are your main expectations of the tourism project? | <ul style="list-style-type: none"> Accessibility to international market . provision of financial support (adequate) Allocations of more sites to visit Training of staff | <ul style="list-style-type: none"> Revamp tourist attraction areas All inclusion in project implantations rehabilitation in jetty services in the river Gambian with limited check points | <ul style="list-style-type: none"> Access to financial assistance |

| Questions | Bird watchers | Tourism and travel Category A | Tourist taxi drivers |
|---|---|--|---|
| What is your capacity building needs to improve your business? | <ul style="list-style-type: none"> Website availability to international Trading of staff in basic computer skills/communication Provision of exchange visits | <ul style="list-style-type: none"> Trading staff Exchange of study tours | <ul style="list-style-type: none"> Training on the use of gaps and maps Introduction of GPS and maps to identify locations |
| What could be the risks of this project for the tourism sector or for local communities? | <ul style="list-style-type: none"> It will affect land ownership at community level Local people will lose their income upon the implantations of the project It will also affect both sport tourism and community tourism | <ul style="list-style-type: none"> loss of lands Risk of small business collapsing | <ul style="list-style-type: none"> No risk |
| What are your main recommendations for a good implementation of the project? | <ul style="list-style-type: none"> Provision of equipment Adequate financial assistance Upgrading the administrative building Material resource and capacity building Maintenance of the only bridge available | <ul style="list-style-type: none"> Access to adequate financial resources All year-round tourism Exchange of study trips for innovation | <ul style="list-style-type: none"> All year-round tourism seasons Elimination of all-inclusive package by hotels Provision of loan from government |

Meeting with associations: Q/A

Date: Feb 23, 2022, and Feb 24 2022

| Questions | Craft market | Hairdresser | Fruits seller |
|---|--|--|--|
| How many members does your association have? (male/women) | <ul style="list-style-type: none"> 782 | <ul style="list-style-type: none"> 75 | <ul style="list-style-type: none"> 250 |
| What are the main activities of your association | <ul style="list-style-type: none"> Creation of craft Design Weaving Vending Sand and oil painting Batik Tie and die Gold and silver smith service Cobblers Tailoring Provision of musical instruments | <ul style="list-style-type: none"> Hair dressing only | <ul style="list-style-type: none"> Fruit selling only |
| What are the difficulties of your associations or members of the association in their activity | <ul style="list-style-type: none"> Lack of financial support No control policies in place to protect their products In adequate raw materials Access to hotel to sell products Low or no income earning during the off season Unnecessary completion between members | <ul style="list-style-type: none"> lack of accessibility into the hotels to look for clients low income during off season no standardized and organized saloons and equipment all inclusion package from hotel | <ul style="list-style-type: none"> All inclusive package hinders our business The impact of covid 19 Sanitary facilities are delapidated with acute water shortages Poor housing No Storage facilities Petty trades interference Relocation of our business far from the tourist area |

| Questions | Craft market | Hairdresser | Fruits seller |
|--|---|--|--|
| What are your main expectations of the tourism project | <ul style="list-style-type: none"> • huge financial support • accessibility to international market • building state of the art center to promote craft • invention of property right | <ul style="list-style-type: none"> • Provision of financial support • Provision of standard saloons and equipment | <ul style="list-style-type: none"> • Financial support to revamp our business • Renovation and maintenance of infrastructure • Abolition of all-inclusive package • Disallowing petty traders on the beaches, since they are not registered, and they do not pay any tax • Competition of contact numbers consisting of fruit seller to always supply or distribute fruits upon request |
| What is your capacity building needs to improve your business | <ul style="list-style-type: none"> • Capacity training on the use of modern machinery • Provision of modern equipment to boost productivity and save time • Development of website for marketing and promotion | <ul style="list-style-type: none"> • A vibrant website to promote and advertise products and service • Financial supports | <ul style="list-style-type: none"> • Provision of a web site advertise and promote our products and service |
| What could be the risks of this project for the tourism sector or for local communities | <ul style="list-style-type: none"> • Relocation and no proper compensation to businesses • Introduction of foreign products to compete with local products | <ul style="list-style-type: none"> • Local hairdressers will be affected upon implementations of project • Relocation of businesses | <ul style="list-style-type: none"> • petty traders were to be banned on beaches, they will lose their income • implementation of the project will kill small or local business |
| What are your main recommendations for a good implementation of the project | <ul style="list-style-type: none"> • Introduction of modern machinery • Advertisement and marketing of product • Development of a skill centers | <ul style="list-style-type: none"> • The need for the tourist season to be all year round • Financial assistance • Our products and service need advertisement at the airport during the arrivals or representatives to be part of the arrivals to sell our products • Strict actions to be taken by the government to engage Gambian tourist board to listen to our plights | <ul style="list-style-type: none"> • Tourist season to be all year round • Strong and viable financial supports to recover from covid 19 • The attitude of the Gambia tourism board needs to be always addressed to come to our aid and address our concerns • We should be always represented upon arrivals to sell or products and services at airport |

| Questions | Horse riders' association | Bumsters association | Parks and wildlife and department of forestry |
|--|---|--|---|
| How many members does your association have? (Male number) and (female number)? | <ul style="list-style-type: none"> 100 members, all male | <ul style="list-style-type: none"> 100 members 3 females 97 males | <ul style="list-style-type: none"> 200 staff |
| What are the main activities of your association? | <ul style="list-style-type: none"> Horse riding Training of kids on horse riding | <ul style="list-style-type: none"> Entertainment Tourist guide | <ul style="list-style-type: none"> Bird watching activities Preservation and protection |
| What are the difficulties of your associations or members of the association in their activity? | <ul style="list-style-type: none"> Access to running water is a challenge We do not have shelter for our horses they are sleeping the open and that could have health hazard Low income of the off season, warrant us to sleep on the beaches without proper accommodation because cannot afford rent We are still forced to pay licenses during low season and during the pandemic We are registered with Gambia tourism board, but we are still harassed on the beach Access to veterinary services for horses is a challenge | <ul style="list-style-type: none"> Lack of recommendation by the authorities Harassment and bullying from law enforcement agents Competition from other foreign nationals who seems to be more recognized and welcomed than local bumsters No proper office allocated to us for operation No access to financial supports Lack of water and sanitary facilities Stigmatization and victimization Corona has a devastating effect on our income | <ul style="list-style-type: none"> No publicity to international market Human intrusion Lack of support from the government Population pressure e.g., settlement, dumping grounds Lack of qualified vets No pharmacy and lab centers No proper roads and bird watching towers Lack of equipment and machinery Human intrusion e.g., poaching, collecting wild fruits |
| What are your main expectations of the tourism project? | <ul style="list-style-type: none"> Organizing horse riding competition Help us with shelter for our horses and concentrated feeds Provide us with running water and electricity with base | <ul style="list-style-type: none"> Access to financial supports Creation of more job opportunities Provision of laws or policies to protect and secure us | <ul style="list-style-type: none"> Vigorous awareness campaigns and publications Training of staffs on hospitality and communication skills Human resources and vehicle to boost capacity |
| What is your capacity building needs to improve your business? | <ul style="list-style-type: none"> Website exposure expected from the project | <ul style="list-style-type: none"> Mobility and transportation to facilitate on operations | <ul style="list-style-type: none"> Access to financial supports |

| Questions | Horse riders' association | Bumsters association | Parks and wildlife and department of forestry |
|--|--|--|---|
| | <ul style="list-style-type: none"> ▪ Facilitate our participation in the international trade fare | <ul style="list-style-type: none"> ▪ Provision of skill trainings ▪ Sensitization and awareness campaigns | <ul style="list-style-type: none"> ▪ Establishment of proper labs and medication centers ▪ To receive more staff trainings ▪ Allocation and provision of risk allowances |
| <p>What could be the risks of this project for the tourism sector or for local communities?</p> | <ul style="list-style-type: none"> ▪ If funds are available, they may be embezzled by the authorities managing it | <ul style="list-style-type: none"> ▪ Poor and improper allocation of funds if available | <ul style="list-style-type: none"> ▪ Flooding, erosion, and environment damages ▪ Multiplication of hippos will graze on rice fields ▪ Transfer of diseases to humans from chimpanzees |
| <p>What are your main recommendations for a good implementation of the project?</p> | <ul style="list-style-type: none"> ▪ Helping us with the necessary horse material for e.g., bridle, saddle steroid, hoof cutters, blankets, and bushes ▪ The horse dung is use as a good fertilizer for women gardeners, we should be help to market | <ul style="list-style-type: none"> ▪ Establishment of a training schools to train tourists in traditional and cultural instruments ▪ Rebranding our name from bumster to local tourist guides and give license to operate. ▪ Allocation of funds to operation micro or small businesses to some of our members who are will to quite the industry | <ul style="list-style-type: none"> ▪ Revival of wildlife act. ▪ Introduction of new species ▪ Provision of a veterinary lab ▪ To conduct wildlife census ▪ Address the issue of poaching, discouraging dumping, revving abuko nature reserve entrance fee ▪ Provision of veterinary equipment and medicines ▪ Chimpanzees' revival and rehabilitation park ▪ Financial support to maintain security personnel on the ground |

Meeting with associations: Q/A

Date:24 Feb 2022

| Questions | The River Gambia National Park | Sambel Kunda woman group | |
|--|--|---|--|
| How many members does your association have? (Male number) and (female number)? | <ul style="list-style-type: none"> Number of staffs: 15 Female: 1 Male:14 | <ul style="list-style-type: none"> A community | <ul style="list-style-type: none"> |
| What are the main activities of your association? | <ul style="list-style-type: none"> They are care takers for the chimpanzees in the 3 islands Protect the island from hunters Protect the animals on the island predators Provide tour guides to tourists that visits the island Create employment for the nearby villages to work in the park Feed the chimpanzees Provide boat for boat trips around the three (3) islands for tourist | <ul style="list-style-type: none"> Their main livelihood is rice and garden production and field crop production Some have small businesses Some also do laundry and provide food provision services in the River Gambia National Park | <ul style="list-style-type: none"> |
| What are the difficulties of your associations or members of the association in their activity? | <ul style="list-style-type: none"> Limited number of engines for their boats Limited resources to repair the boats Fishermen from different communities come to fish in the river mostly at night when the patrols are not at work Disturbs from boat machines driver animals away from the island Accommodation rooms for guests need some renovation | <ul style="list-style-type: none"> Shortage of water in the community Lack of materials to easy their production in the garden and rice fields Poor road facilities No nearby health felicitities Lack of cold storage room No electricity in the community | <ul style="list-style-type: none"> |

| Questions | The River Gambia National Park | Sambel Kunda woman group | |
|---|---|--|---|
| | <ul style="list-style-type: none"> • Fishermen also get close to the island which can expose the chimpanzees to disease • Fishing methods use on the river by fishermen • Limited staffs | | |
| What are your main expectations of the tourism project? | <ul style="list-style-type: none"> • Assist in protecting the island 24 hours a day • Support to purchase more qualities boats • Maintenance of the old boats • Assist in getting more engines for boats • Renovation of the accommodation centers | <ul style="list-style-type: none"> • Provision of a storage facility to keep their harvested stock • Provision of materials to easy their work and increase their production • They also need market to help them sell their produce • Construction of the road that heads to the highway • Construction of a health felicities | • |
| What is your capacity building needs to improve your business? | <ul style="list-style-type: none"> • They need assistance to facilitate their guide school they are having | <ul style="list-style-type: none"> • Conflict with community's member and with other communities • Deforestation • Increase in population • Difficulties with the park (the river Gambia national park) • The Park does not encourage the communities to work in the camp due to their lot of policies and deduction | • |
| What could be the risks of this project for the tourism sector or for local communities? | <ul style="list-style-type: none"> • Chimpanzees will be expose to humans which can also expose them to diseases | <ul style="list-style-type: none"> • Increase in child abuse and labor without oversight of works • Loss in the production lands and rice fields (as a possible impact of activities/disruption) | • |

| Questions | The River Gambia National Park | Sambel Kunda woman group | |
|--|--|--|---|
| | <ul style="list-style-type: none"> ▪ Some wild animals meant run away as the population of human will increase ▪ Lost in the environment due to human activities | | |
| <p>What are your main recommendations for a good implementation of the project?</p> | <ul style="list-style-type: none"> ▪ Construction of roads from the highway to the park | <ul style="list-style-type: none"> ▪ The project should be given to the right people for implementation | <ul style="list-style-type: none"> ▪ |

Meeting with associations: Q/A

Date: Feb 24 2022 and

| Questions | Different security units task force | The slave museums | Rest house Juffureh |
|--|---|---|---|
| How many members does your association have? (Male number) and (female number)? | <ul style="list-style-type: none"> 6 units | <ul style="list-style-type: none"> 2 (both) men | <ul style="list-style-type: none"> None |
| What are the main activities of your association? | <ul style="list-style-type: none"> Provision of security to the tourists and enforce law and order Surveillance and intelligent | <ul style="list-style-type: none"> Lecture tourists about the history of the museums Security in the the museums site | <ul style="list-style-type: none"> Note this was a places used for music school and now it is changed is owned by the local communities but given out to an individual |
| What are the difficulties of your associations or members of the association in their activity? | <ul style="list-style-type: none"> Logistical problems (vehicles) Lack of communication equipment Lack of right laws in place to help execute our duties Lack enough personnel or understaff to take the rising of crimes The intervention of female lawyers' associations also hinders our function | <ul style="list-style-type: none"> No work scandals No payment of overtime hours No trading of staff | |
| What are your main expectations of the tourism project? | <ul style="list-style-type: none"> Registration of sex workers to follow up their health status and vaccination Creation of center for skills development for those who want other job opportunities | | |
| What are your capacity building needs to improve your business? | <ul style="list-style-type: none"> More training of staff Provision of vehicles | | |

| Questions | Different security units task force | The slave museums | Rest house Juffureh |
|--|--|-------------------|---------------------|
| | <ul style="list-style-type: none"> ▪ New and modern communication equipment's ▪ To boost youth employment opportunities ▪ More human resources to counter the growing crime rates | | |
| <p>What could be the risks of this project for the tourism sector or for local communities?</p> | <ul style="list-style-type: none"> ▪ Unemployed youths turning to become bandits ▪ Increase prostitution ▪ Excessive security lapses and loopholes | | |
| <p>What are your main recommendations for a good implementation of the project?</p> | <ul style="list-style-type: none"> ▪ Rigid laws to be put in place ▪ Provision of employment for youths ▪ Providing and creating rehabs and counselling centers for youths into drugs | | |

ANNEX 12: ATTENDANCE LIST FOR THE STAKEHOLDER MEETING

Tourism Recovery, Diversification, and Resilience Project in Gambia
 Preparation mission of Project safeguards documents: Environmental Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Environmental and Social Commitment Plan (ESCP), Labor Management Procedures (LMP) (LMP), Stakeholder Engagement Plan (SEP)

Date: 28/02/2022 Location: ST. ISIDORE Object: STAKEHOLDER CONSULTATION
 DEPT. OF TOURISM

Attendance List

| N° | NAME | Function | sex | Phone contact | signing |
|----|------------------|-----------------------------|-----|-----------------|-------------|
| 01 | Alhassany Colley | chief wildlife officer | M | 3505211 | [Signature] |
| 02 | Mr Kessou | DPW | M | 2501124 | [Signature] |
| 03 | Muhammad Saital | Penalty Dept | M | 9878945 | [Signature] |
| 04 | Abdoulie Sawo | SW CO | M | 2308020 | [Signature] |
| 05 | Binta Ceessay | Data Collector | F | 7177765 | [Signature] |
| 06 | Fatou Ceessay | Data collector | F | 2226909 | [Signature] |
| 07 | Cheikh Sagna | CEO chemas consulting group | M | +1(202)932-9226 | [Signature] |
| 08 | Mamat Sallal | Moic Rep. | M | 9857654 | [Signature] |
| 09 | Lamin Camara | Freelance researcher | M | 3145708 | [Signature] |
| 10 | Sakou Camara | Freelance researcher | M | 2094263 | [Signature] |
| 11 | | | | 5335626 | [Signature] |
| 12 | | | | | |

MINISTRY OF LAND / CPA

Tourism Recovery, Diversification, and Resilience Project in Gambia
 Preparation mission of Project safeguards documents: Environmental Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Environmental and Social Commitment Plan (ESCP), Labor Management Procedures (LMP) (LMP), Stakeholder Engagement Plan (SEP)

Date: 28/02/2022 Location: ST. ISIDORE Object: STAKEHOLDER CONSULTATION

Attendance List

| N° | NAME | Function | sex | Phone contact | signing |
|----|---------------|----------------------|-----|-----------------|-------------|
| 01 | Lamin Fatta | National Coordinator | M | 7643558 | [Signature] |
| 02 | Sakou Camara | Freelance | M | 2094363 | [Signature] |
| 03 | Fatou Ceessay | Data collector | F | 2226909 | [Signature] |
| 04 | Binta Ceessay | Data collector | F | 7177765 | [Signature] |
| 05 | Cheikh Sagna | CEO chemas group | M | +1(202)932-9226 | [Signature] |
| 06 | Lamin Camara | Freelance researcher | M | 3145708 | [Signature] |
| 07 | Binta Sauly | Permanent Secretary | M | 9984651 | [Signature] |
| 08 | Mamat Sallal | Moic Rep. | M | 9857654 | [Signature] |
| 09 | | | | | |

BENCH BAR ASSOCIATION

Tourism Recovery, Diversification, and Resilience Project in Gambia
 Preparation mission of Project safeguards documents: Environmental Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Environmental and Social Commitment Plan (ESCP), Labor Management Procedures (LMP) (LMP), Stakeholder Engagement Plan (SEP)

Date: 26/02/2022 Location: STICARD Object: STAKEHOLDER CONSULTATION

Attendance List

| N° | NAME | Function | sex | Phone contact | signing |
|----|-----------------|--------------------------|-----|--------------------|---------|
| 01 | Hassan Ndow | President Asso | M | 9988907 3653244 | |
| 02 | Alassana Sanneh | B-Bar Operator | M | 3208984 | |
| 03 | Nandifa Manneh | B-Bar Owner | M | 7073232 | |
| 04 | Lamin Jallow | B-Bar Operator | M | - | |
| 05 | Lamin Fadu | | | 2827692 | |
| 06 | Lamin Camara | Freelance | M | 3145708 | |
| 07 | Sakou Camara | FREELANCE DATA COLLECTOR | M | 2074363 3355626 | |
| 08 | Fatou Ceesay | Data collector | F | 2286709 | |
| 09 | Binta Ceesay | Data collector | F | 7177765 | |
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| 11 | | | | | |

Tourism Recovery, Diversification, and Resilience Project in Gambia
 Preparation mission of Project safeguards documents: Environmental Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Environmental and Social Commitment Plan (ESCP), Labor Management Procedures (LMP) (LMP), Stakeholder Engagement Plan (SEP)

Date: 27/02/2022 Location: STICARD Object: STAKEHOLDER CONSULTATION

Attendance List

| N° | NAME | Function | sex | Phone contact | signing |
|----|---------------|--------------|-----|---------------|---------|
| 01 | Saidou Bah | Horse riding | M | 7830359 | |
| 02 | Madiw Jallow | Horse riding | M | 2208451 | |
| 03 | EBRIMA BARRY | Horse riding | M | 3636965 | |
| 04 | MUHAMMEDI SAM | Horse riding | M | 7057966 | |
| 05 | LAMIN Ceesay | Horse riding | M | 7382984 | |
| 06 | MUSA CONATEH | MEMBER | M | 2497205 | |
| 07 | | | | | |

Beach Restaurant Association

Tourism Recovery, Diversification, and Resilience Project in Gambia
 Preparation mission of Project safeguards documents: Environmental Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Environmental and Social Commitment Plan (ESCP), Labor Management Procedures (LMP) (LMP), Stakeholder Engagement Plan (SEP)

Date: 26/09/2022 Location: ST. ISOBARD Object: STAKEHOLDER CONSULTATION

Attendance List

| N° | NAME | Function | sex | Phone contact | signing |
|----|------------------|-----------|-----|---------------|---------|
| 01 | MR DRIS BENSOUDA | TREASURER | M | 7903463 | |
| 02 | Mrs Khadyja t/gm | Secretary | F | 3422332 | |
| 03 | | | | | |
| 04 | | | | | |

GACC/GWCC & GACC Consultation meeting

Tourism Recovery, Diversification, and Resilience Project in Gambia
 Preparation mission of Project safeguards documents: Environmental Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Environmental and Social Commitment Plan (ESCP), Labor Management Procedures (LMP) (LMP), Stakeholder Engagement Plan (SEP)

Date: 28/09/2022 Location: ST. ISOBARD Object: STAKEHOLDER CONSULTATION

Attendance List

| N° | NAME | Function | sex | Phone contact | signing |
|----|--------------------------------------|------------------------|-----|--------------------|---------|
| 01 | Mamat Sallal | Moic rep | M | 9857654 | |
| 02 | Bakoum Kebbel | GACC | M | 7866040 | |
| 03 | Abdoulie Fadara | GACC | M | 7725334 | |
| 04 | Muhammed Sagne | GCCI | M | 7555500 | |
| 05 | Lamin Camara | freelance | m | 3145708 | |
| 06 | Saikou Camara | Freelance PRESIDENT | M | 2094363 5355826 | |
| 07 | Heikla SAGNA | Consultant | M | 11(202)933-7226 | |
| 08 | Fatou ceesay | Data collector | F | 2226709 | |
| 09 | Binta ceesay | Data collector | F | 7177765 | |
| 10 | Beatrice A. Ntase | GWCC | F | 7826144 | |
| 11 | | | | | |
| 12 | | | | | |
| 13 | <u>znewest@gmail.com</u> | | | | |
| 14 | <u>30 Sulou Camara@gmail.com</u> | | | | |
| 15 | | | | | |

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Tourism Recovery, Diversification, and Resilience Project in Gambia
 Preparation mission of Project safeguards documents: Environmental Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Environmental and Social Commitment Plan (ESCP), Labor Management Procedures (LMP) (LMP), Stakeholder Engagement Plan (SEP)

Date: 01/03/2022 Location: STAKEHOLDER CONSULTATION Object: STAKEHOLDER CONSULTATION

Attendance List

| N° | NAME | Function | sex | Phone contact | signing |
|----|----------------|------------------------|-----|--------------------|---------|
| 01 | Mamad Sallah | NCP/Misc Rep | M | 9857654 | |
| 02 | Njagga Touray | Director ISM | m | 1163876 | |
| 03 | Mamadi Dampha | DPS | m | 6166806 9166806 | |
| 04 | Soukhou Camara | Researcher CUSTOMER | m | 2091563 5365676 | |
| 05 | Lamin Camara | " " | M | 3145708 | |
| 06 | Fatou Ceesay | D/c | F | 2286709 | |
| 07 | Binta Ceesay | d/c | F | 7177765 | |
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Tourism Recovery, Diversification, and Resilience Project in Gambia
 Preparation mission of Project Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Environmental and Social Commitment Plan (ESCP), Labor Management Procedures (LMP) (LMP), Stakeholder Engagement Plan (SEP)

Date: 01/03/22 Location: people disability Object: STAKEHOLDER CONSULTATION

Attendance List

| N° | NAME | Function | sex | Phone contact | signing |
|----|---------------|-----------------------|-----|--------------------|---------|
| 01 | Mamadi Dampha | DPS | m | 6166806 9166806 | |
| 02 | Mamad Sallah | NCP/Misc Rep | M | 9857654 | |
| 03 | Gaira Lamin | Co-ordinator | m | 7055335 9812080 | |
| 04 | | | | | |
| 05 | Lamin Colley | DG | m | 7649381 9952030 | |
| 06 | | | | | |
| 07 | Fatou Ceesay | D/c | f | 2286709 | |
| 08 | Binta Ceesay | D/c | f | 7177765 | |
| 09 | Lamin Camara | Freelance Research | M | 3145708 | |
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