



**The Gambia**

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*Ministry of Higher Education, Research, Science and Technology*

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**Africa Centers of Excellence for Development Impact/ ACE Impact**

**THE GAMBIA**

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**ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK  
(ESMF)**

*Prepared by the Association of African Universities*

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**Revised version**

**July 2019**

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**Currency equivalence** (Exchange Rate Effective May 16, 2018):

Gambia Dalasi (GMD) 47.77 = 1US\$

*List of acronyms and abbreviations*

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AAU	Association of African Universities
ACE	Africa Center of Excellence
IDA	International Development Association
ECOWAS	economic Community of West African States
EIA	Environmental Impact Assessment
ESIS	Environmental and Social Information Sheet
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
GEAP	The Gambia's Environmental Plan
GHG	Greenhouse gas
MoHERST	Ministry of Higher education, Research, Science and Technology
M&E	Monitoring and Evaluation
NDMA	National Disaster Management Agency
NEA	National Environment Agency
NEMA	National Environmental Management Act
NEMAC	National Environmental Management Council
PIU	Project Implementation Unit
OP	Operational policy
RFU	Regional Facilitation Unit
SSF	Simplified Screening Form
ToR	Terms of Reference
W-ESMP	Worksite-Environmental and Social Management Plan
WB	World Bank

The Association of African Universities (AAU), in charge of implementing the ACE Impact Project, is the apex organization and forum for consultation, exchange of information and co-operation among institutions of higher education in Africa.

It represents the voice of higher education in Africa on regional and international bodies and supports networking by institutions of higher education in teaching, research, information exchange and dissemination.

## EXECUTIVE SUMMARY

### I. PURPOSE AND OBJECTIVES OF THE ESMF

The *Environmental and Social Management Framework (ESMF)* of the Africa Centers of Excellence (ACE) for Development Impact Project was prepared in The Gambia by the *Association of African Universities (AAU)* on behalf of the Ministry of Higher Education, Science, Research and Technology (MoHERST). It aims to provide a general view of the environmental and social conditions under which the Project will be implemented.

Since the exact locations of the intervention sites of the Project are not yet known, this ESMF has been prepared by the borrower to provide the standard procedure and institutional arrangements for environmental and social screening, categorization and approval of sub-projects as well as guidelines for the preparation, implementation and monitoring of the site specific environmental work (such as simplified Environmental and Social Impact Assessments/Environmental Management Plans (ESIAs/EMPs) or environmental measures). These site-specific instruments include environmental clauses to be inserted in Contractors' Bidding Documents.

### II. DESCRIPTION OF THE PROJECT

The Project Development Objective is to improve the quality, quantity and development impact of postgraduate education in selected universities through regional specialization and collaboration.

The project has three components:

- ▶ **Component 1** aims to build and strengthen the capacity of competitively selected ACE Impact centers based in higher education institutions across West and Central Africa;
- ▶ **Component 2** seeks to expand the regional scope of impact of the ACEs funded under Component 1 by providing demand-side funding for partnering institutions and regional students to buy training and services from the ACEs; and
- ▶ **Component 3** will fund, through a Regional IDA grant of US\$10 million to the Association of African Universities (AAU), the facilitation of the ACE Impact project's regional activities and support to centers under the project.

The total Project budget for activities in The Gambia is approximately **12 million US\$** - a credit from the International Development Association (IDA).

The *Association of African Universities (AAU)* will be responsible for implementation support of Components 1 and 2 (as well as the overall regional facilitation of ACE Impact, which falls under Component 3).

A project team lead by MoHERST will facilitate the implementation of the ACE Impact Project in The Gambia.

### III. POLITICAL, INSTITUTIONAL AND LEGAL CONTEXTS

In the Gambia, the protection of the environment constitutes a priority axis of the sustainable development policy. The ACE Impact Project will strictly respect and follow the political, legal and regulatory frameworks for Gambian environmental management policies, regulations and standards.

#### National and International Framework

The environmental policies and legal framework and procedures considered as relevant under the ACE Impact are the following:

- ▶ **The National Development Plan 2018- 2021:** This development plan aims to achieve sustainable inclusive growth and prosperity by making the poverty reduction efforts more

effective by explicitly creating productive economic opportunities for the poor and vulnerable sections of society.

- ▶ The ***Gambia's Environmental Action Plan (GEAP)***, which seeks to promote and implement sound environmental policy, is the master plan for the environment in the Gambia and contains a *National Environment Policy, Framework Environmental Legislation* and *Environmental Strategy*. The Plan puts special emphasis on environmental management, pollutions and nuisances, and the necessity to safeguard the well-being of the populations.
  
- ▶ The ***National Climate Change Policy***, approved in 2017, provides the framework for managing climate risks and identifying new opportunities for climate-resilient sustainable development. To support implementation of the NCCP, the country developed the ***Strategic Program for Climate Resilience (SPCR)***, an overarching strategy designed to reduce and manage the country's high vulnerability to climate variability and change.
  
- ▶ Major objectives of the ***National Disaster Strategy***, are, among others, to develop and strengthen institutional mechanisms and capacities to build resilience to hazards; to prepare communities to ensure that they are fully equipped to anticipate and respond to disaster event; and to promote a transparent, systematic and consistent approach to disaster risk assessment and management.

The Gambia is a signatory to the key Multilateral Environmental Agreements, such as the *United Nations Framework Convention on Climate Change (UNFCCC)*, the *United Nations Convention on Biological Diversity (UNCBD)*, and the *United Nations Convention to Combat Desertification (UNCCD)*; as well as the *World Heritage Convention*. The country has also ratified the *Kyoto Protocol* committing her to the sustainable management of the environment.

### **Institutional framework**

The ***National Environmental Management Council (NEMAC) of The Gambia*** brings together the Heads from all key Government Departments whose activities may impact the environment and whose mandate include monitoring developments relating to the environment. The Council oversees environmental policies, adopts environmental standards, guidelines, and regulations proposed by the NEA, and sets the terms and conditions of service of the staff.

- ▶ The ***National Environment Agency (NEA)*** is the principal body responsible for the management of the environment and co-ordinates all activities of the Government in this field. Legislation stipulates that it is NEA's role to coordinate, assess, control and evaluate the utilization of the natural resources of the country, and in doing so, to promote their preservation and rational use. NEA is also responsible for regulating Environmental Impact Assessment (EIA) procedures in the Gambia.
  - Under the ACE Impact Project, the NEA will be responsible for giving the final approval of environmental assessments and certifying, where appropriate, the compliance of the proposed activities with Gambia's environmental protection legislation.

### **Legal framework**

The 1994 ***National Environmental Management Act (NEMA)*** is the main document setting out the overall management of the environment in The Gambia. The objective of this law is to define some legal basis for a correct use and a viable management of the environment and its components.

- ▶ The law focuses on the necessity of realizing ***Environmental Impact Assessment (EIA)*** for projects and programs having negative effects on the environment or public health, and formulates ***guidelines and regulations on the EIA***, including checklists and screen forms, and

main components of the assessment and the approval procedures. In this respect, the environmental law is relevant to the activities of the ACE Impact Project.

According to Gambian EIA Regulations, all development projects are subject to **environmental screening**. Prior to granting permission to proceed with a project, a proponent is obliged to complete a *Pre-Evaluation Form* that has been developed by the NEA. Based on the screening exercise, NEA decides on whether an EIA is required or not for any project. In the event where an EIA is not required, the proponent is still obliged to describe methods and procedures for proper environmental management.

**The National Centre of Arts and Culture Act 2003** seeks to preserve, promote and develop Gambian arts and culture. The Act provides for the establishment of a center as a guardian of the nation's cultural and historic heritage with responsibility to conserve, promote and celebrate the country's artistic, cultural and historic inheritance. Any finding of cultural or historic interest is to be reported immediately to the Centre who will proceed with the necessary measures assess the significance of the find and determine how it could be preserved. The Act is directly relevant to the activities of the ACE Impact Project.

### **Procedures and Regulations for Environmental Management**

The **Environmental Assessment Regulations** (1999) provide the legal framework for the conduct of EIA procedures. They clearly spell out the EIA process, the categorization of projects and sub-projects; the nature of the environmental assessment; the competencies required in the EIA field; etc. The procedure is of direct relevance under the ACE Impact Project.

### **World Bank Safeguards Policy**

The World Bank Environmental and Social Safeguards Guidelines and Operational Policies enable the integration of environmental and social considerations into the development, planning and execution of development projects. These policies are designed to: (i) protect the environment and society from the potential negative effects of projects, plans, programs and policies; (ii) reduce and manage the risks associated with implementation of project activities; and (iii) assist in better decision-making to ensure sustainability of activities.

➔ **The ACE Impact project is classified as "category B"**, because its adverse effects on the population or areas of environmental importance are **limited, site-specific, and likely reversible**, and mitigation measures can be more **easily designed / implemented**.

Among all the World Bank environmental and social safeguard policies, **two Operational Policies (OPs) and Bank Procedures (BPs) are triggered under the ACE Impact Project**, namely:

- ▶ **OP/BP 4.01 Environmental Assessment**, which covers impacts on the environment, human health and safety, physical cultural resources, and global transboundary and environmental issues. OP 4.01 is triggered because the Project is likely to have environmental risks and impacts on its area of influence. This policy requires that environmental and social consequences be identified early in the project cycle and considered in the selection, location, planning, and design of the project to minimize, prevent, reduce, or compensate for adverse impacts and thereby maximize positive impacts and include processes for mitigation and management of environmental and social impacts during the project cycle.
- ▶ **OP/BP 4.11 Cultural Physical Resources**, which provides cultural heritage guidelines to avoid or mitigate adverse impacts of development projects. This policy applies to the following projects: (i) any project involving major excavation, demolition, earthworks, flooding or other environmental modifications; (ii) any project located on or near a site recognized as cultural property; (iii) any project designed to support the management or conservation of physical cultural property. As part of the ACE Impact Project, this will also concern buildings of historical value and which would be the subject of rehabilitation works.

*No other operational policies of the World Bank are triggered under Project ACE Impact.*<sup>1</sup>

Under the Project, the following will also be used: (i) the World Bank Group's *Environmental, Health and Safety Guidelines*; and (ii) the 2010 *Access to Information Policy* for wide dissemination of all information concerning the nature and objectives of a project. The World Bank Group *Guidelines on Labor Influx* will be applied during construction phase of the project.

### Comparing National Procedures and World Bank Policies

In general, there is great **convergence of views and similarity** between The Gambia's environmental and social management systems and that of the World Bank. All laws, regulations and instruments governing investments and activities in the natural resources sector are generally consistent with the Bank procedures. However, there are also **some gaps and discrepancies**: for example, the Gambia regulations on EIA include a tool only for pre-assessment of projects based on preliminary environmental information. The provisions of the national law on EIA are less comprehensive than those of the World Bank OP.4.01 Environmental Assessment (which calls for the environmental screening of all Bank-financed projects) and OP 4.11 on Physical cultural resources.

- If policy discrepancy exists in some domains, **World Bank policies will override** national policies and regulations during the implementation of this Project.

## IV. ENVIRONMENTAL AND SOCIAL EVALUATION OF THE PROJECT

### Typology of the activities of the Project

The Centers of Excellence to be built or rehabilitated in The Gambia have not yet been selected. However, the main work that will likely be undertaken under the ACE Impact Project and that may have an environmental and social impact is as follows:

- ▶ Construction of new buildings or other facilities within the current boundaries of university campuses;
- ▶ Extension of current buildings and facilities;
- ▶ Rehabilitation of old buildings and facilities, including repair of recent buildings that do not meet current standards.

### General Environmental and Social Impacts

Overall, in relation to these activities, all the negative or harmful environmental and social impacts that are likely to be generated by the Project will be **limited in time and space**.

- The activities planned under the Project **exclude any form of land or property acquisition or resettlement or physical displacement of populations** (all work will be done in lands belonging to the university – with property title or supporting evidence, and therefore do not need to develop a resettlement policy framework in accordance with ISDS).

### General Positive Impacts

The Project will have **many positive effects**, which should be sustained over the long term. *In general*, it will help fight poverty and boost shared prosperity, as well as encourage investment in knowledge and skills in all sub-sectors of education. Promising investments will be made in regional infrastructure and economic integration, with a focus on initiatives to produce highly qualified human resources for priority growth sectors. *More specifically*, the Project will promote awareness among all national stakeholders about the environmental and social issues of Project activities and respect for the environment and the key principles of sustainable development.

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<sup>1</sup> The other policies are the following: *OP 4.04 Natural Habitats*, which does not allow the financing of projects degrading or converting critical natural habitats; *OP 4.12 Involuntary resettlement*, which covers an impact on individuals or small businesses, with loss of housing or shelter, loss of income or, in some cases, expropriation of private land and physical displacement of dwellings or shelters. *OP 4.09, Pest Management*; *OP 4.10: Indigenous Peoples*; *OP 4.36: Forests*; *OP 4.37 Safety of Dams*; *PO 7.50 International Waterways*; and *PO 7.60, Disputed Areas*

### Risks or Negative Impacts During the Pre-Construction Phase

During the pre-construction phase (preparation of the bidding documents), the main risk is neglect of the environmental and social aspects and their low consideration during the technical studies and / or the preparation of unsatisfactory environmental studies. This risk can be compounded if the information aspects and public participation are not taken into account. Furthermore, site selection could include some potential environmental and social concerns and impacts: for example, in the siting of works on sections of campuses where they could conflict with adjoining land use outside the campus land, or on areas prone to soil erosion or damage.

Key mitigation measures for these risks will be: (i) public and stakeholder consultation during site selection and preparation and validation of studies; (ii) quality control and implementation of validation procedures for environmental studies and their dissemination; and (iii) regular supervision of any site building by environmental experts (in addition to the control of the relevant national institutions in relation to contractual specifications).

- ▶ The effects of *climate change* will be taken into account in the choice of materials, the overall design of buildings and the technological options for construction (e.g., energy efficiency). The building will be in consonance with local climatic, environmental, and meteorological conditions and will incorporate proper ventilation and provision of sunshine, air movement, and maximum usage of the daylight.
- ▶ *Location and design of new buildings* should also take into account site-specific risks (such as location near gullies which are prone to flooding and erosion; near water bodies and designated forests etc.).
- ▶ *Sourcing of construction materials* should be considered, especially given the risk of contractors using non-registered quarries, illegal sand-mining or creating new quarries through illegal extractions.
- ▶ The design of the buildings under the ACE Impact Project will take into account *the gender dimension*, especially in relation to the provision of a sufficient number of separate men's and women's washrooms (with the installation of lavatories, washbasins and urinals, etc.).
- ▶ All facilities, whether to be built or rehabilitated, will be designed to address *accessibility issues*, in strict compliance with national standards for the protection and promotion of persons with disabilities.
- ▶ The need to present the design before the steering committee for their observation prior to start of construction. All designs within the project should take into account the needs of different persons including gender needs and persons with different abilities/limited mobility. And these should reflect on the toilets as well as classrooms;
- ▶ The need to conduct site specific ESMP for the project to help identify all impacts (real or potential risks) and report thereof submitted to the Agency prior to commencement of the project implementation;
- ▶ The need to provide insurance cover for workers as part of the Contract Bidding document to make it binding on contractors during the implementation;
- ▶ The need to setup an independent body to be charged with grievance redress during the implementation of the project;
- ▶ Insertion of identified safeguard measures in the Bid documents for the contractors to be bound by these and implementation to be fully monitored;

### Risks or Negative Impacts at the Construction phase

Construction phase risks and impacts at the construction phase will be site specific. Even though they are manageable and small, this phase will have *low to moderate impacts* and could be a source of inconvenience for workers and all those living or working on university campuses. Of these impacts, the most important are the following.

***Air quality, noise, water and sanitation, solid waste***

- Pollution and nuisance (noise, dust) due to the construction of facilities.
- Occasional forms of pollution generated in construction sites by waste.
- Solid and liquid waste from construction sites.
- Impact of some works on sources of drinking water.
- Damage to some underground networks and even temporary suspension of certain services (water, electricity, etc.).
- Emissions of greenhouse gas (GHG) related to the exhaust gases of construction vehicles, as well as olfactory nuisances, health risks and pollution.

***Vegetation and soils***

- Uprooting of trees and cutting of shrubs made necessary by certain activities, with reduction of green spaces.
- Risks of localized soil degradation, even though washout works will be limited in depth.
- Certain forms of soil erosion due to construction activities.
- Risk of subsidence and landslides due to possible excavation work.
- Risks of floods, without the adoption of soil waterproofing techniques.

***Hygiene, health and safety of workers, residents and users***

- Accidents caused by construction machinery traffic and possible non-compliance with safety instructions.
- Risk of accidents around excavations and open trenches that are unreported, unmarked and poorly lit.
- Safety of university campus users due to poor organization of work sites and work areas.
- Accidents of workers (scaffolding falls, misuse of equipment, electrocutions, etc.).

***Natural risks***

- Some of the proposed development could be affected by risks associated with the effects of climate change (in particular, risks associated with floods caused by heavy rains).

***Risks of conflicts between the workers and local populations***

- The works may have impacts on university campuses, with the likely restriction of vehicle and pedestrian traffic in the vicinity of construction sites, noise and dust-related inconvenience, space congestion caused by building materials, construction and construction waste, not to mention negative impacts due to the transformation of the landscape.
  - ▶ To avoid social tension, it is desirable to recruit ***local workforce***.
  - ▶ Although it is expected that selected contractors would recruit a local workforce, it can be expected that ***skilled and unskilled workers*** may be brought in for temporary periods from outside the community. This would potentially increase risks of sexual harassment, prostitution and underage sex on vulnerable sections of the local population, especially women and minors.

***Physical cultural resources***

- Some historic and archaeological buildings may be affected by the work and some excavations may reveal archaeological and historical remains.

**Risks or Negative Impacts During the Maintenance Phase**

During the occupancy and maintenance phase, project activities should not pose any particular environmental and social problems. Potential negative impacts should generally be due to: inadequate design; the lack of a system for the collection and transfer of waste, in particular solid waste; a possible lack of an effective, regulatory and adapted sanitation system; lack of regular maintenance procedures; insufficient enforcement of security measures; and the lack of appropriate measures for people with disabilities.

Regulations of the ***National Disaster Management Agency (NDMA)*** will be strictly adhered to under the ACE Impact Project (especially in terms of fires or explosions, with, for example, the installation

of smoke detectors, extinguishers, and alarm devices in all the facilities). All these risks can cause a malfunction or a deterioration of the works and generate certain negative impacts.

- ▶ In compliance with national regulations, building companies working under the ACE Impact Project will be required **to regularly monitor** compliance with safety and health standards, and to periodically carry out measurements, analyses and assessments of environmental conditions and, where appropriate, undertake collective or individual protection measures to prevent damage to the safety and health of workers.

Different measures (identified in this report) will be planned to reduce the potential impacts during implementation of the various activities planned under the ACE Impact Project:

- *Normative measures* to be complied with by the promoter of a sub-project and its contractors (companies carrying out the works), in accordance with national regulations and World Bank OP 4.01 and OP.4.11;
- *Mitigation measures* to reduce potential negative environmental and social effects.

## V. ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

Under the ACE Impact Project, all the activities (sub-projects) must be subjected to *an environmental and social screening*, a procedure aimed to:

- ▶ Determine the nature and the extent of their anticipated adverse environmental and social impacts;
- ▶ Define the most appropriate backup tool, depending on the nature and extent of these impacts;
- ▶ Establish and implement appropriate mitigation measures.

### Harmonizing national and World Bank procedures

**Under the ACE impact Project**, the following sub-projects will be considered **ineligible**:

- ▶ **World Bank Category A subprojects**, which may have very negative, diverse, irreversible environmental and social impacts.
- ▶ Sub-projects for which the World Bank operational policies are not triggered.

**In terms of Gambian procedures** (in compliance with the 1994 *National Environmental Management Act (NEMA)*):

- ▶ The **National Environment Agency (NEA)** is responsible for regulating Environmental Impact Assessment (EIA).
- ▶ All development projects are subjected to an **environmental screening**.
- ▶ Prior to granting permission to proceed with a project, a proponent is obliged to complete a **Pre-Evaluation Form** that has been developed by the NEA.
- ▶ The nature, type and location of the project is described in the environmental screening form with a preliminary indication of potential socio-economic and biophysical impacts (number of people/ communities affected, sensitive habitats, threatened species, etc.).
- ▶ NEA invites **public comments** on statements of project intent submitted to it especially from those most likely to be affected by a proposed.
- ▶ NEA classifies projects and makes a decision on whether a full **Environmental Impact Assessment (EIA)** is required.

**In terms of World Bank requirements** (in compliance with POs 4.01 and 4.11):

- ▶ An **Environmental and Social Information Sheet (ESIS)** will be drawn up (to complement – if needed - national forms).
- ▶ For subprojects whose environmental and social impact will be considered **low**, a simple **Environmental and Social Information Sheet (ESIS)** will be drawn up (to complement national forms). This will include appropriate measures to be eventually integrated into

the Contractor's Technical specifications.

- ▶ For sub-projects whose environmental and social impacts will be considered as *moderate*, an **Environmental and Social Management Plan (ESMP)** will be prepared, even if, because of the nature of the works, Gambian procedures do not require the preparation of a full EIA. (This report outlines terms of reference and content of the ESMP).
  - An ESMP is a detailed plan and schedule of measures necessary to minimize, mitigate or control any potential negative environmental and social impacts identified under the ACE Impact Project. An ESMP consists of a set of generic mitigation, monitoring and institutional measures to be taken during implementation and operation of the proposed project to eliminate negative environmental and social impacts, offset them or reduce them to acceptable levels.
- ▶ Key results of the ESMP will be included in the **Worksite-ESMP** to be prepared by the contractor. This ESMF provides the outline of the W-ESMP and an indicative list of environmental measures.

**Public consultations** with key stakeholder will be held regularly during the entire process.

Under the ACE Impact Project, an adequate **Grievance Redress Mechanisms** will be set up at the level of each participating university (E-system). Within this system, all environmental and social related complaints and grievances will be addressed in a timely, effective and efficient manner.

## VI. ENVIRONMENTAL AND SOCIAL MONITORING AND CONTROL

Environmental and Social monitoring and control is a crucial component of the ESMF during project implementation. The system aims to describe: (i) the elements to be monitored; (ii) monitoring methods and tools; (iii) the responsibilities for monitoring and reporting; and (iv) the periodicity of monitoring.

Environmental and social internal monitoring is carried out by the Project's Safeguard expert with the aim of ensuring that environmental and social safeguards are followed. This monitoring will concretely include: (i) the inclusion of the mitigation measures recommended in the sub-project; (ii) the compliance oversight during the building activities; and (iii) the monitoring of environmental and social management measures in implementation of different activities.

- ▶ The **National Safeguards expert** will be assisted by the **Regional Safeguard Consultant** at the **Regional Facilitation Unit (RFU)** (based in Accra, Ghana), whose role is to ensure consistent and harmonious implementation and monitoring of safeguards measures in all the countries under the ACE Impact Project.

The **external environmental and social monitoring**, carried out by NEA at its discretion, is intended to ensure compliance with national regulations on environmental and social protection and to verify the quality of implementation of environmental protection measures.

## VII. ACTION PLAN: MAIN RECOMMENDATIONS

The main recommendations of the ESMF's Action Plan of the ACE Impact Project in The Gambia are the following:

- I. **Environmental and social screening:** By Project effectiveness, each participating university must have prepared the description of its subproject (facilities to be built or rehabilitated).

This will enable the Project's safeguards expert, in collaboration with NEA, to move quickly to the next steps on environmental and social safeguards. This process will be updated each year as the annual work plan is prepared.

- II. Qualified personnel:** *The University* will use the services of a qualified person (appointed or recruited), who will be in charge of implementing the safeguards measures, including monitoring, surveillance, control and evaluation of risk mitigation measures, and keeping the partnership links with NEA throughout the project.
- III. Operational Manual:** The Project's *Operational Manual* must include a section on the basic principles and regulatory measures of the ESMF, indicating in particular:
- ▶ Subprojects' screening procedures;
  - ▶ The respective responsibilities of different stakeholders (such as, issuance of environmental permit by the national environmental agency or preparation of complete Worksite ESMP, including a Safety and Hygiene Plan, by the contractors);
  - ▶ Mechanisms to control and monitor environmental & social indicators; and
  - ▶ Costs of environmental and social safeguards.
- IV. Information, Sensitization and Training on Environmental and Social Management (ESM) issues:** Information and sensitization sessions on ESM will be provided to all the stakeholders involved in implementation of the Project, including the building companies (contractors).
- ▶ Within the context of the *Impact boot camp* that, prior to Project effectiveness, the AAU will organize for all university teams, special sessions will focus on environmental and social safeguards issues and the key elements of the ESMF.
- V. Grievance Redress Mechanism:** Under the regional e-system for grievances management, which will be created within each participating university / center, a special section will concern all environmental and social safeguards-related grievances.

***Once it has been discussed, approved and validated by all stakeholders,  
this Action Plan will be binding.***

## **VIII. BUDGET**

The budgeting for implementation of the ESMF will be done at two levels:

- ▶ **At the national level:** *each participating university* will have a budget of a maximum of **USD 50,000** to cover costs of technical measures related to environmental and social assessment procedures, including various capacity building initiatives and preparation and monitoring of ESIA's / ESMPs for sub-projects.
- ▶ **At the regional level:** *the AAU* will reserve **USD 200,000** for the regional safeguard consultant, national and regional disclosures, and associated missions/workshops.

All costs related to environmental and social risk mitigation measures will be included in the budgets of the individual sub-projects.

*This draft version of the ESMF will be presented and discussed in a public consultation, with the participation of main stakeholders, i.e., representatives of:*

- ▶ *Non-governmental organizations (working on environment and education);*
- ▶ *Businesses (representatives of national medium and/or small building companies);*
- ▶ *Neighborhood associations;*
- ▶ *Professors of different university departments and faculties;*
- ▶ *Associations of graduate and post-graduate students;*
- ▶ *Etc.*

*Comment and suggestions of the participants will be used to prepare the final version of the ESMF.*

*The minutes of the consultation itself will be integrated into the final version of the ESMF.*

## I. PRESENTATION AND PURPOSE OF THE ESMF

### I.1 Purpose of the ESMF

1. The *Environmental and Social Management Framework (ESMF)* of the Africa Centers of Excellence for Development Impact was prepared in The Gambia by the *Association of African Universities (AAU)* on behalf of the Ministry of Higher Education, Research, Science and Technology (MoHERST) of The Gambia. It aims to provide a general view of the environmental and social conditions under which the Project is implemented.

2. Since the exact locations of the intervention sites of the Project are not yet known, this ESMF has been prepared by the borrower to provide the standard procedure and institutional arrangements for environmental and social screening, categorization and approval of sub-projects as well as guidelines for the preparation, implementation and monitoring of the site specific environmental work (such as simplified Environmental and Social Impact Assessments/Environmental Management Plans (ESIAs/EMPs) or environmental measures). These site-specific instruments include environmental clauses to be inserted in contractors' bidding documents.

3. The *main specific objectives* of the ESMF are as follows

- ▶ Integrate environmental and social issues into project planning.
- ▶ Present the legal framework of social and environmental management in The Gambia.
- ▶ Identify the main state and non-state institutions involved.
- ▶ Establish a framework to identify, analyze and evaluate the potential environmental and social impacts of the activities planned under the project.
- ▶ Define the methodology for subproject screening and required social and environmental safeguards.
- ▶ Identify the main risk mitigation measures.
- ▶ Clarify the roles and responsibilities of the stakeholders and define the monitoring and surveillance framework for implementation of the ESMF.
- ▶ Determine budget implications for environmental and social project management.

### I.2 Timetable

4. The preparation of the ESMF involves the holding of a national public consultation (organized by MoHERST) with representatives of key stakeholders to present and discuss the analyzes and recommendations of the draft document. The minutes of the public consultation are presented in Annex 8.

5. The final version of the ESMF, incorporating most of these comments and the minutes of the public consultation, will be prepared and published on the website of MoHERST and the World Bank external website.

6. The publication and disclosure of the ESMF must imperatively be completed before the evaluation of the Project.

7. Printed paper versions of the ESMF will be available at MoHERST.

## II. PROJECT DESCRIPTION

### II.1 Project Development Objective

8. The Project Development Objective is to improve the quality, quantity and development impact of postgraduate education in selected universities through regional specialization and collaboration.

### II.2 Components

9. **Component 1: Establishing new Africa Centers of Excellence and scaling up well-performing existing Africa Centers of Excellence for development impact.** This component aims to build and strengthen the capacity of competitively selected ACE Impact centers based in higher education institutions across West and Central Africa.

- **Sub-component 1.1 will establish new centers of excellence for skills and knowledge for development challenges.** About 30 centers will be competitively selected based on pre-established selection criteria to receive funding from ACE IMPACT.
- **Sub-component 1.2: Scaling up well-performing ACEs:** This sub-component will provide additional funding and support to approximately 12 existing ACEs (currently supported through ACE I) to enable them to scale-up their activities.
- **Sub-component 1.3 Additional support to the best Engineering and Technology ACE institutions:** Institutions will be selected to host an engineering and technology-focused ACE Impact center with capacity in other engineering and technology disciplines.

10. **Component 2: Regional Partnerships and Scholarships.** Component 2 seeks to expand the regional scope of impact of the ACEs funded under Component 1 by providing demand-side funding for partnering institutions and regional students to buy the training and services from the ACEs that are most relevant:

- **Sub-component 2.1** will support regional institutional partnerships between higher education institutions and the ACEs (under component 1 of the proposed project) to strengthen the capacity of the higher education institutions.
- **Sub-component 2.2** will finance two types of regional scholarships to support primarily the training of the next generation of faculty for higher education institutions in the region.

11. **Component 3: Enhancing Regional Policymaking, Monitoring, and Facilitation.** **Component 3 will support regional policymaking for higher education and regional project monitoring and facilitation.** Component 3 will fund, through a Regional IDA grant of US\$10 million to the Association of African Universities (AAU), the facilitation of the ACE Impact project's regional activities and support to centers under the project.

### II.3 Institutional arrangements

12. The *Association of African Universities (AAU)* will be responsible for implementation support of Components 1 and 2 (as well as the overall regional facilitation of ACE Impact).

13. A *Project Implementation Unit (PIU)*, placed within the *Ministry of Higher Education, Research, Science and Technology*, will facilitate implementation of the Gambian elements of the ACE Impact Project.

### II.4 Budget

14. The total Project Budget for activities in The Gambia is approximately **USD 12 million**, based on a credit from the International Development Association (IDA).

## II.5 Biophysical and socioeconomic environment

15. After the identification of the participating universities, the socio-environmental context of the sites will be described and analyzed in the Environmental and Social Data Sheets (ESDSs) and in the Environmental and Social Management Plans (ESMPs), which will be prepared. For each sub-project.

16. The Gambia is a small and fragile country in West Africa. It stretches 450 km along the Gambia River. Its 10, 689 sq. km area is surrounded by Senegal, except for a 60 km Atlantic Ocean front. The country has a population of 1.9 million. With 176 people per square kilometer, it is one of the most densely populated countries in Africa. Most of the population (57%) is concentrated around urban and peri-urban centers.

17. Poverty is widespread and remained stagnant at 48.6% in 2015, compared to 48.1% in 2010. In rural areas, a higher proportion of the population (almost 70%) are poor. International migrants represent 9% of the population, and their remittances provide a safety net for the poor

18. The Gambia lies between 13.79<sup>0</sup> and 16.82<sup>0</sup> West longitude and entirely within 13<sup>0</sup> North latitude. It has an estimated area of 11,300 km<sup>2</sup> and is bounded by Senegal to the North, South and East and by the Atlantic Ocean to the West. The country is bisected by the River Gambia that originates from the Fouta Djallon highlands, forming the North and South banks. Banjul is the administrative center and capital situated on an island on the southern bank at the mouth of the river. The country has seven administrative regions namely: North Bank Region, Lower River Region, Central River Region, Upper River Region, West Coast Region, Banjul City Council and the Kanifing Municipal Council.

19. The Gambia is characterized by 7 - 8 months of hot and dry Sudano-sahelian climate and 4 – 5 months of rain from June to September. Rainfall is heaviest in August but there are variations with most rain recorded in the south west of the country. Average annual rainfall is 800 mm/year.

20. The Gambia, one of the world's poorest countries, is faced with rapid population growth which is putting tremendous pressure on its few resources and remaining forests. The government has enacted laws to promote sustainable development, but these are widely disregarded and not understood by the largely illiterate population. In addition, the government lacks the funds and staff to enforce this legislation. Over the past generation the environment in Gambia suffered from fuelwood collection, subsistence agriculture, and clearing for livestock, as well as hunting and desertification.

21. The *key long-term development challenges* that The Gambia faces are related to its undiversified economy, small internal market, lack of skills necessary to build effective institutions, high population growth, lack of private sector job creation, and high rate of out-migration.

22. Resilience to external shocks, such as volatile weather conditions and the effects of climate change, need to be strengthened through (a) diversification of the economy and an improved private sector investment climate; (b) effective civil service reform and improved public management capacity geared toward enhanced service delivery and conditions to support long-term growth and employment; and (c) improved transparency and accountability in public affairs and increased citizen participation.<sup>1</sup>

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<sup>1</sup> For these last three paragraphs, source : <http://www.worldbank.org/en/country/gambia>.

### III. POLITICAL, INSTITUTIONAL AND LEGAL CONTEXTS

23. In the Gambia, the protection of the environment constitutes a priority axis of the sustainable development policy. The ACE Impact Project will strictly comply with and follow the political, legal and regulatory frameworks of Gambian environmental management.

24. This chapter provides an overview of the relevant policies, laws and regulations specifically addressing sectors relevant to the activities of the ACE Impact project, and focuses on the environmental legislation, policies, frameworks and procedures that are likely to be applicable to

#### III.1 National and international policy framework

25. The environmental policies and legal framework and procedures considered as relevant under the ACE Impact are presented below.

- ▶ *The National Development Plan 2018 2022* aims to achieve sustainable inclusive growth and prosperity by making the poverty reduction efforts more effective by explicitly creating productive economic opportunities for the poor and vulnerable sections of society. The focus is to strengthen the country's productive and trade capacities within a green economy.
- ▶ The *Gambia's Environmental Action Plan (GEAP)*, which seeks to promote and implement sound environmental policy, is the master plan for the environment in the Gambia and contains a *National Environment Policy, Framework Environmental Legislation* and *Environmental Strategy*. The Plan puts special emphasis on environmental management, pollutions and nuisances, and the necessity to safeguard the well-being of the populations.
- ▶ The *National Climate Change Policy* approved in 2017. The Policy provides the framework for managing climate risks and identifying new opportunities for climate-resilient sustainable development. To support implementation of the NCCP, the country developed the *Strategic Program for Climate Resilience (SPCR)*, an overarching strategy designed to reduce and manage the country's high vulnerability to climate variability and change.
- ▶ Major objectives of the *National Disaster Strategy*, are, among others, to develop and strengthen institutional mechanisms and capacities to build resilience to hazards; to prepare communities to ensure that they are fully equipped to anticipate and respond to disaster event; and to promote a transparent, systematic and consistent approach to disaster risk assessment and management.

26. The Gambia is a signatory to the key Multilateral Environmental Agreements (MEAs) such as the *United Nations Framework Convention on Climate Change (UNFCCC)*, the *United Nations Convention on Biological Diversity (UNCBD)*, and the *United Nations Convention to Combat Desertification (UNCCD)*; as well as the *World Heritage Convention*. The country has also ratified the *Kyoto Protocol* committing her to the sustainable management of the environment.

#### III.2 Institutional framework

27. The *National Environmental Management Council (NEMAC)*, chaired by the President of the Republic, brings together the Secretaries of State from all key Government Departments whose activities may impact the environment and whose mandate include monitoring developments relating to the environment. The Council oversees environmental policies, adopts environmental standards, guidelines, and regulations, and sets the terms and conditions of service of the staff.

28. The *National Environment Agency (NEA)* established by an Act of Parliament in 1993, is the principal body responsible for the management of the environment and co-ordinates all activities of the Government in this field.

- ▶ NEA is responsible for regulating Environmental Impact Assessment (EIA) procedures in the Gambia.
- ▶ Legislation stipulates that it is NEA's role to coordinate, assess, control and evaluate the utilization of the natural resources of the country, and in doing so, to promote their preservation and rational use. It should also coordinate the activities in the area of environment, in order to ensure the integration of environmental variables in the process of planning and managing socio-economic development.
  - Under the ACE Impact Project, the NEA will be responsible for giving the final approval of environmental assessments and certifying, where appropriate the compliance of the proposed activities with Gambia's environmental protection legislation.

29. The **Environmental Impact Assessment (EIA) Working Group** advises the NEA Executive Director on the approval or otherwise of environmental impact statements and undertakes scoping exercises, public consultations and the review of draft environmental impact statements that developers submit to the NEA for the Executive Director's approval.

*Ministry of Higher Education, Research, Science and Technology*

The main missions of the **Ministry of Higher Education, Research, Science and Technology** is in charge of implementing the ACE Impact Project in The Gambia.

Its main missions are *the following*: provide access to relevant and high-quality education; provide high quality higher education services; make science & technology the engine of growth; promote innovation in science and technology; promote research in science and technology; and ensure sustainable environmental growth.

#### III.4 Legal framework

30. The **National Environmental Management Act (NEMA)** 1994, is the main document setting out the overall management of the environment. It is an Act of general legislation that provides a legal framework for activities in the environmental sector. The objective of this law is to define some legal basis for a correct use and a viable management of the environment and its components, in order to establish a system of sustainable development in the Gambia. This law focuses on the necessity of realizing **Environmental Impact Assessment (EIA)** for projects and programs having negative effects on the environment or public health, and formulates **guidelines and regulations on the EIA**, including: checklists and screen forms; the main component of the assessment and the approval procedures. In this respect, the environmental law is directly relevant to the activities of the ACE IMPACT Project.

- ▶ According to Gambian EIA Regulations, all development projects are subject to **environmental screening**. Prior to granting permission to proceed with a project, a proponent is obliged to complete a *Pre-evaluation Form* that has been developed by the NEA. The nature, type and location of the project is described in the environmental screening form with a preliminary indication of potential socio-economic and biophysical impacts (number of people/ communities affected, sensitive habitats, threatened species, etc.). Based on the screening exercise, NEA makes a decision on whether an EIA is required or not. In the event where an EIA is not required, the proponent is still obliged to describe methods and procedures for proper environmental management.

31. *The 2003 National Centre of Arts and Culture Act* seeks to preserve, promote and develop Gambian arts and culture. The Act provides for the establishment of a center as a guardian of the nation's cultural and historic heritage with responsibility to conserve, promote and celebrate the country's artistic, cultural and historic inheritance. The Centre is an autonomous institution with a governing board. Any finding of cultural or historic interest is to be reported immediately to the Centre who will proceed with the necessary measures assess the significance of the find and determine how it could be preserved. The Act directly is relevant to the activities of the ACE Impact Project.

32. Several other regulations are in place to support implementation of the NEMA, and they include the following:

- ▶ *Environmental Quality Standards Regulations (EQSR)* which established an Environmental Quality Standards Board with the primary responsibility of proposing environmental quality standards to the NEMC and to periodically review the standards. The standards set by this law apply to ambient air, saline waters, surface fresh waters, and groundwater.
- ▶ *Environmental Discharge (Permitting) Regulations (EDPR)* which require the registration of processes with the potential to pollute. NEA may refuse to issue permits to these processes to discharge their wastes if their potential to pollute could exceed the limits of the Environmental Quality Standards.
- ▶ *The National Water Management Act* (2007) (by the Department of Water Resources) is implementing the new Water Management Act which provides for the management and rational utilization of water in the country.

### III.5 Procedures and Regulations for Environmental Management

33. The *Environmental Assessment Regulations* (1999) provide the legal framework for the conduct of EIA procedure. The EIA Regulations and Procedure clearly spells out the EIA process, the Categorization of projects and sub-projects (A, B, C); Environmental Assessment, the procedure for technical assessment of the reports; the competencies required in the EIA field; etc. The procedure is of relevance directly to the proposed infrastructure activities of ACE Impact, particularly as regards the classification of activities and the carrying out of the EIAs (see these procedures in Annex 1).

### III.6 World Bank Safeguards Policy

34. The World Bank Environmental and Social Safeguards Guidelines and Operational Policies enable the integration of environmental and social considerations into the development, planning and execution of development projects. These policies are designed to: (i) protect the environment and society from the potential negative effects of projects, plans, programs and policies; (ii) reduce and manage the risks associated with implementation of project activities; and (iii) assist in better decision-making to ensure sustainability of activities. The Bank Environmental and Social Safeguard Policies provide guidance to the World Bank on the process, scope and extent of environmental and social assessment required for project evaluation.

35. Every project is subject to a preliminary environmental and social review based on the type, location, degree of sensitivity, scale, nature and extent of its potential environmental and social impacts, which is class in one of the following categories:

- ▶ *Category A:* Project that is likely to have very negative, nerve, diverse or unprecedented impacts on the environment.
- ▶ *Category B:* Project whose adverse effects on the population or areas of environmental importance (land, forests, and other natural habitats, etc.) are moderate.
- ▶ *Category C:* Project whose likelihood of negative environmental impacts is considered minimal or zero.

➔ *The ACE IMPACT project is classified as "category B", because its adverse effects on the population or areas of environmental importance are **limited, site-***

*specific, and likely reversible*, and mitigation measures can be more *easily designed/implemented*.

36. Among all the World Bank environmental and social safeguard policies, **two Operational Policies (OPs) and Bank Procedures (BPs) are triggered under the ACE Impact Project**, namely:

- ▶ **OP/BP 4.01 Environmental Assessment**, which covers impacts on the environment (air, water and land), human health and safety, physical cultural resources, and global transboundary and environmental issues. OP 4.01 is triggered because the Project is likely to have environmental risks and impacts on its area of influence. This policy requires that environmental and social consequences be identified early in the project cycle and considered in the selection, location, planning, and design of the project to minimize, prevent, reduce, or compensate for adverse impacts and thereby maximize positive impacts and include processes for mitigation and management of environmental and social impacts during the project cycle.
- ▶ **OP/BP 4.11 Cultural Physical Resources**, which provides cultural heritage guidelines to avoid or mitigate adverse impacts of development projects. This policy applies to the following projects: (i) any project involving major excavation, demolition, earthworks, flooding or other environmental modifications; (ii) any project located on or near a site recognized as cultural property; (iii) any project designed to support the management or conservation of physical cultural property. As part of the ACE IMPACT project, this will also concern buildings of historical value and which would be the subject of rehabilitation works. The construction companies will follow the key procedures of the *Cultural Heritage in Environmental Assessment. Environmental assessment Sourcebook* (1994), prepared by the World Bank and the “chance finds” procedure must be applied.<sup>1</sup>

37. **No other operational policies of the World Bank are triggered under Project ACE IMPACT.** It is recalled that these are the following policies: *OP 4.04 Natural Habitats*, which does not allow the financing of projects degrading or converting critical natural habitats; *OP 4.12 Involuntary resettlement*, which covers an impact on individuals or small businesses, with loss of housing or shelter, loss of income or, in some cases, expropriation of private land and physical displacement of dwellings or shelters. *OP 4.09, Pest Management; OP 4.10: Indigenous Peoples; OP 4.36: Forests; OP 4.37 Safety of Dams; PO 7.50 International Waterways; and PO 7.60, Disputed Areas.*

38. Under ACE Impact Project, the following will also be used: The World Bank Group’s *Environmental, Health and Safety Guidelines*; and the 2010 *Access to Information Policy* for wide dissemination of all information concerning the nature and objectives of a project. The World Bank Group *Guidelines on Labor Influx* will also be applied during construction phase of the project (see key elements of the guidelines in Annex 2).

### III.7 Comparing National Procedures and World Bank Policies

39. In general, there is great **convergence of views and similarity** between The Gambia's environmental and social management system and that of the World Bank. All laws, regulations and instruments governing investments and activities in the natural resources sector are generally consistent with the Bank procedures. However, there are also **some discrepancies**: for example, the Gambia’s regulations on EIA include a tool only for pre-assessment of projects based on preliminary environmental information. The provisions of the national law on EIA are less comprehensive than those of the World Bank OP.4.01 Environmental Assessment, which calls for the environmental screening of all Bank-financed projects.

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<sup>1</sup> See Annex 3.

- If policy discrepancies and gaps exist in some domains, **World Bank policies will override** national policies and regulations: World Bank safeguards policies will be binding when implementing WB funded projects.

### III.8 Other Relevant policies

40. In 2016, the Government of The Gambia launched the **Child Protection Strategy** that includes actions to address the worst forms of child labor. However, children continue to engage in the worst forms of child labor. Gaps in the law remain, including a need to increase the compulsory education age to the minimum age for work. In addition, labor law and criminal law enforcement efforts are limited. According to the Children's Act (article 43), the minimum age for work is 16, and the minimum age for hazardous work is 18 (see also The Labor Act).

- Building companies operating under the ACE Impact Project **will strictly comply with this legislation about child labor.**

41. The Gambia does not have specific legislation guaranteeing the human rights of **the disability community**, however, it has some legislation in place that partly works to secure human rights of people living with disabilities. The **Constitution** of The Gambia safeguards some basic rights for disabled people including a disability policy and draft disability bill. The country has also signed and ratified numerous international treaties concerning basic human rights, which are binding for The Gambia under international law but not under Gambian law until they have likewise been pushed through domestic legal channels. The **National Disability Bill** covers a wide range of topics including inclusive education for the disabled child and special measures for the protection of women with disabilities.

- The facilities to be built or rehabilitated under the ACE IMPACT Project **will strictly comply with this legislation.**

### III.9 Constitutional Appeal Bodies

42. In the Gambia, the **Ombudsman** is an official who holds the power to investigate allegations of maladministration, mismanagement, corruption, discrimination and deal with human rights and protection of fundamental freedoms of the citizenry. The Ombudsman might have a role in managing disputes related to the ACE Impact Project.

- In cases of major disputes, persons affected by the activities of the ACE Impact Project **will be assisted**, if necessary, to submit their claims to the Ombudsman.

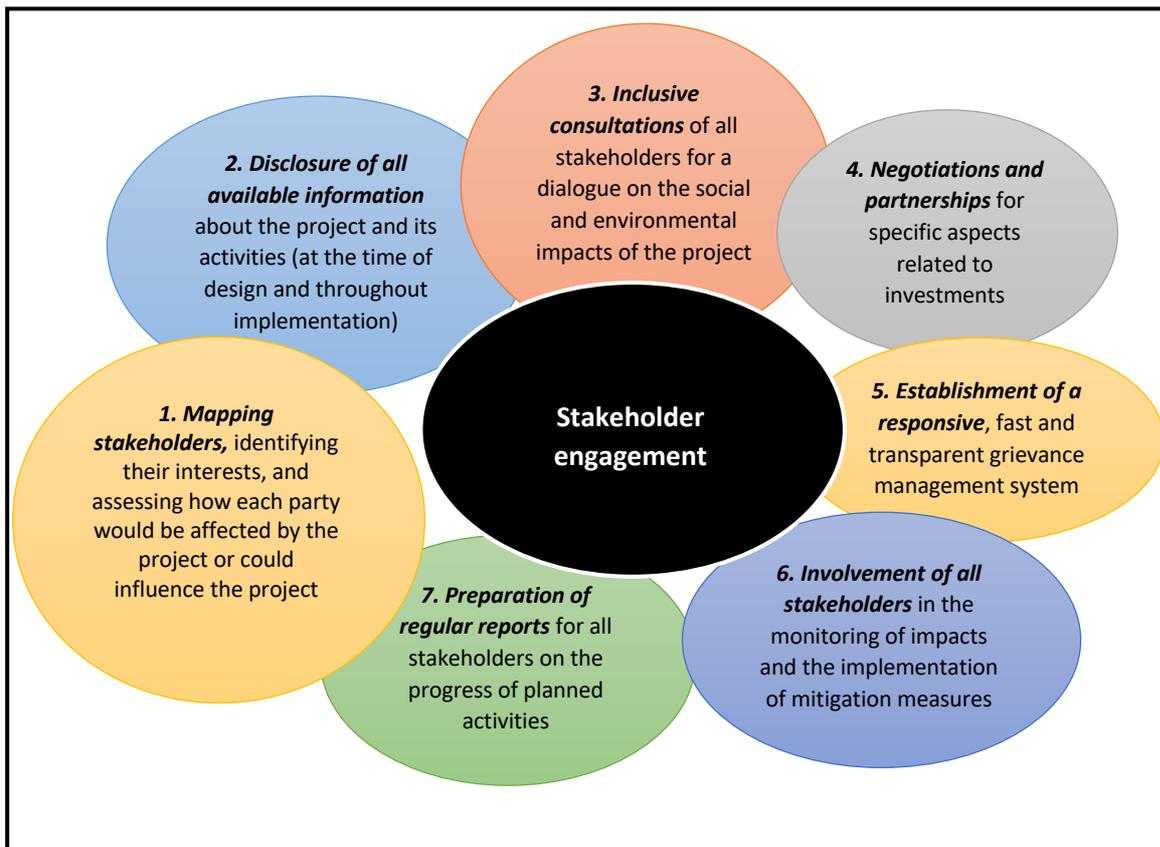
## IV. CONSULTATION OF STAKEHOLDERS

### IV.1 The stakeholders

43. The ACE Impact Project will define and adopt a comprehensive and balanced approach to social mobilization and stakeholder engagement. It will develop a plan to involve the active participation of all stakeholders in decision-making processes, to foster dialogue and reduce tensions.

44. The elements of this social mobilization plan are presented visually in the Diagram below.

**Diagram: Main components of stakeholder engagement**



### IV.2 Social Engagement

45. Engagement of all stakeholders will be an inclusive, ongoing and expanded process during implementation of the CEA Impact Project.

46. The goal is to develop and maintain open and constructive relationships with all stakeholders to facilitate the management of the project and its stakeholders. individual sub-projects, including their environmental and social effects and risks.

47. This ESMF will be presented and discussed in a public consultation, with the participation of main stakeholders (the minutes of the public consultation are presented in Annex 5). Potential participants of the consultations are representatives of:

- ▶ Non-governmental organizations (working on environment and education);
- ▶ Businesses (representatives of national medium and/or small building companies);
- ▶ Neighborhood associations;

- ▶ Professors of different university departments and faculties;
  - ▶ Associations of graduate and post-graduate students;
  - ▶ Etc.
- The first phase of the ACE Project demonstrated the importance of active student participation in promoting academic excellence. These comments have been through regular student surveys and regular supervision meetings with student groups.

Both mechanisms served as feedback and complaint management mechanisms in the first phase. In addition, civil society, including businesses and other non-governmental entities, will be part of the sectoral advisory committees of each of the Centers to guide the center's activities to ensure that education and research activities meet the needs of the community. of development

## V. ENVIRONMENTAL AND SOCIAL EVALUATION OF THE PROJECT

48. This chapter considers potential environmental and social concerns likely to arise from these activities under the ACE IMPACT Project.

### V.1 Typology of the Activities of the Project

49. The Centers of Excellence sites have not yet been selected in The Gambia. However, the main work that will likely be done under the ACE Impact Project and that may have an environmental and social impact is as follows:

- ▶ Construction of new buildings or other facilities within the current boundaries of university campuses,
- ▶ Extension of current buildings and facilities
- ▶ Rehabilitation of old buildings and facilities, including adjustments of recent buildings that do not meet current standards.

### V.2 General Environmental and Social Impacts

50. Overall, in relation to these activities, all the negative or harmful environmental and social impacts that are likely to be generated by the Project will be *limited in time and space*.

- The activities envisaged under the ACE Impact Project *exclude any form of acquisition of land or property* or resettlement or physical displacement of populations (all work will be done in land belonging to the university).

### V.3 General Positive Impacts

51. The Project will have *many positive effects*, which should be sustained over the long term. *In general*, it will help fight poverty and boost shared prosperity, as well as encourage investment in knowledge and skills in all sub-sectors of education. Promising investments will be made in regional infrastructure and economic integration, with a focus on initiatives to produce highly qualified human resources for priority growth sectors. *More specifically*, the project will contribute to raising awareness about environmental and social issues, in particular by including in the contract specifications of the building companies' clauses specific to the respect of the environmental components and accompanying risk mitigation measures.

### V.4 Risks or Negative Impacts During the Pre-Construction Phase

52. During the pre-construction phase (preparation of the bidding documents), the main risk is neglect of the environmental and social aspects and their low consideration during the technical studies and / or the preparation of unsatisfactory environmental studies. This risk can be compounded if the information aspects and public participation are not taken into account. Furthermore, site selection could include some potential environmental and social concerns and impacts: for example, in the siting of works on sections of campuses where they could conflict with adjoining land use outside the campus land, or on areas prone to or that have suffered soil erosion or damage.

53. Key mitigation measures for these risks will be: (i) public and stakeholder consultation during site selection and preparation and validation of studies; (ii) quality control and implementation of validation procedures for environmental studies and their dissemination; and (iii) regular supervision of building sites by environmental experts (in addition to the control of the relevant national institutions in relation to contractual specifications). Finally, mitigation measures could include relocating the nuisance activity outside the campus and boxing up remedial civil works with the proposed construction activity.

- ▶ The effects of climate change will be taken into account in the choice of materials, the overall design of buildings and the technological options for construction (e.g., energy efficiency). The building will be in consonance with local climatic, environmental, and meteorological conditions and will incorporate proper ventilation and provision of sunshine, air movement, and maximum usage of daylight.
- ▶ Location and design of new buildings should also take into account site-specific risks (such as location near gullies which are prone to flooding and erosion; near water bodies and designated forests etc.).
- ▶ Sourcing of construction materials should be considered, especially given the risk of contractors using non-registered quarries, illegal sand-mining or creating new quarries through illegal extractions.
- ▶ The design of the buildings under ACE Impact will take into account *the gender dimension*, especially in relation to the provision of a sufficient number of separate men's and women's washrooms (with the installation of lavatories, washbasins and urinals, etc.).
- ▶ All facilities, whether to be built or rehabilitated, will be properly designed in strict compliance with national standards for the protection and promotion of *persons with disabilities*, by removing barriers for their inclusion and improving their accessibility to physical infrastructure.
  - Major measures to be planned are as follows: access ramps should have resting places and be of low slope; pathways should be of limited slope and include sufficient turning radius; doors should be light and easy to turn, and entrances should be sufficiently wide; parking space should be close to the main entrance; furniture, counters, equipment, power sockets, and plugs should be placed at suitable heights reachable by persons who use wheelchairs; handrails should be easy to grasp; etc.

#### V.5 Risks or Negative Impacts at the Construction Phase

54. Construction phase risks and impacts at the construction phase will be site specific. Even though they are manageable and small, this phase will have *low to moderate impacts* and could be a source of inconvenience for workers and all those living or working on university campuses. Of these impacts, the most important are:

##### *Air quality, noise, water and sanitation, waste*

- Pollution and nuisance (noise, dust) due to the construction of infrastructures (buildings).
- Dust generated by excavation work, improper storage of construction materials and cuttings, and the movement of construction machinery.
- Noise and vibrations due to construction machinery and noisy equipment (jackhammers, air compressors, etc.).
- Presence of polluting paints, with resin and potentially toxic or dangerous solvents (for asthmatics, for example), asbestos and lead in products used for the rehabilitation of buildings.
- Occasional forms of pollution generated in construction sites by waste (some works could also affect the sewerage and waste disposal networks).
- Increased volumes of used oil due to certain work requiring the use of vehicles and various Class DD hazardous waste devices - these oils include hydraulic oils, motor, gearbox and lubricating oils and insulating and heat carrying fluids.
- Impact of some works on sources of drinking water.
- Damage to some underground networks and even temporary suspension of certain services (water, electricity, etc.).
- Emissions of ozone depleting substances if air conditioners contain R22 fluid hydro-chloro-fluorocarbons (HCFCs).
- Emissions of greenhouse gas (GHG) related to the exhaust gases of construction vehicles, as well as olfactory nuisances, health risks and pollution.

##### *Vegetation and soils*

- Uprooting of trees and cutting of shrubs made necessary by certain activities, with reduction of green spaces.
- Risks of localized soil degradation, even though washout works will be limited in depth.
- Certain forms of soil erosion due to construction activities: in particular, the artificialization of soils could contribute to making the soil impermeable, thus limiting the infiltration of rainwater and increasing the runoff, with a saturation of the networks of sanitation .
- Risk of subsidence and landslides due to possible excavation work.
- Risks of floods, without the adoption of soil waterproofing techniques.

#### ***Hygiene, health and safety of workers, residents and users***

- Accidents caused by construction machinery traffic and possible non-compliance with safety instructions.
- Risk of accidents around unreported excavations and open trenches, unmarked and poorly lit.
- Safety of university campus members due to poor organization of work sites and work areas (e.g., poor gear location, improper storage of construction materials and equipment, etc.) and no signaling of certain areas at risk (for extension work or installation of equipment).
- Accidents of workers (scaffolding falls, misuse of equipment, electrocutions, etc.).

#### ***Natural risks***

- Some of the proposed developments could be affected by the risks associated with floods caused by heavy rains (in particular, the risks associated with floods caused by heavy rains).

#### ***Risks of conflicts between workers, residents and users***

- The works may have impacts on university campuses, with the likely restriction of vehicle and pedestrian traffic in the vicinity of construction sites, noise and dust-related inconvenience, space congestion caused by building materials, construction and construction waste, not to mention negative impacts due to the transformation of the landscape.
  - ▶ To avoid social tension, it is desirable to recruit ***local workforce***.
  - ▶ Although it is expected that selected contractors would recruit a local workforce, it can be expected that ***skilled and unskilled workers*** may be brought in for temporary periods from outside the community. This would potentially increase risks of sexual harassment, prostitution and underage sex on vulnerable sections of the local population, especially women and minors.<sup>1</sup>

#### ***Physical cultural resources***

- Some historic and archaeological buildings may be affected by the work and some excavations may reveal archaeological and historical remains.<sup>2</sup>

### **V.6 Risks or Negative Impacts During the Maintenance Phase**

55. During the occupancy and maintenance phase, project activities should not pose any particular environmental and social problems. Potential negative impacts might generally be due to: inadequate design; the lack of a system for the collection and transfer of waste, in particular solid waste; a possible lack of an effective, regulatory and adapted sanitation system; the lack of regular maintenance procedures; and the lack of appropriate measures for people with disabilities. Major objectives of the ***National Disaster Strategy*** are, among others, to develop and strengthen institutional mechanisms and capacities to build resilience to hazards; to prepare communities to ensure that they are fully equipped to anticipate and respond to disaster event; and to promote a transparent, systematic and consistent approach to disaster risk assessment and management. Regulations of the ***National Disaster Management Agency (NDMA)*** will be strictly adhered to under the ACE Impact Project (in terms of fires or explosions, with, the installation of smoke detectors, extinguishers and alarm devices). All

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<sup>1</sup> See also Annex 2.

<sup>2</sup> See Annex 3.

these risks can cause a malfunction or a deterioration of the works and generate certain negative impacts.

- ▶ In compliance with national regulations, building companies working under the ACE Impact Project will be required **to regularly monitor** compliance with safety and health standards, and to periodically carry out measurements, analyses and assessments of environmental conditions and, where appropriate, undertake collective or individual protection measures to prevent damage to the safety and health of workers.

56. The environmental and social risks of the Project and the corresponding mitigation measures are summarized in Table 1 below. (See also Annex 7 for the indicative list of environmental and social clauses to be included in the contracts of the building companies and their respective ESMP-Worksites).

#### **V.7 Measures Mitigating the Adverse Impacts of the Project**

57. Different measures will be planned to reduce the potential impacts during implementation of the various activities planned under the ACE Impact Project:

- ▶ *Normative measures* to be complied with by the promoter of a sub-project and its contractors (companies carrying out the works), in accordance with national regulations and World Bank OP 4.01 and OP 4.11;
- ▶ *Mitigation measures* to reduce potential negative environmental and social effects;

**Table 1 : Check list. Environmental and social risks and mitigating measures**

Types of risk	Assessment	Level of risk (*)	Main measures
1. Tendering process (pre-construction phase)	Neglecting environmental, occupational Health & Safety and social issues	Low to moderate	Preparation of appropriate Appeal file offers, which will be validated by NEA and approved by the WB. All mitigation measures must be included into the contractor bid documents
2. Constructions	Risks related to large deep excavations; opening of trenches for laying extension and densification pipes.	Moderate	Selection of specialized companies Conduct of prior technical studies. Preparation of detailed technical specifications for contractors Worker awareness of the risks associated with these activities Ensure the integration of the mitigation measures of these risks on the Health and Safety Plans of building companies
3. Demolitions or extensions of building	Safety of workers, residents and users  Compliance with the rules in the use of large machines for the demolition of buildings	Moderate	Preparation of detailed technical specifications (procedures with risks analysis) of Contractors During indoor demolition activities, debris must be kept in a controlled area. Water must be sprayed to reduce dust from debris. Eliminate dust during pneumatic drilling and destruction of walls by continuous vaporization of water and / or installation of dust screens on the site Maintain the surrounding environment (sidewalks, roads) free of debris, in order to minimize the amount of dust No open fire of construction / waste materials will be carried out on the site. Equip the staff with appropriate Personal Protective Equipment (PPE) for example glasses, shoes, gloves, helmet...
4. Soils	Pollution risks or accidental soil erosion (at the site and neighborhood level)	Low	Conducting any preliminary geotechnical studies. Anti-erosion measures Set up retention for hazardous products and absorbent kits in case of accidental spills
5. Waters	Potential groundwater pollution and groundwater contamination (accidental spills of hydrocarbons and lubricating oils)	Low to moderate	Use of small structures allowing the flow of rainwater Wastewater management: Sanitary sewage disposal (or sealed and fenced pit) Quality control of drinking water Implementation of appropriate erosion and sediment control measures, such as hay bales and / or silt barriers to prevent the movement of sediments from the site and the generation of excessive turbidity in the yards. water and nearby rivers.
6. Debris	Construction debris	Moderate	Correct management of debris, according to the standards established in the contractor's ESMP-W
7. Waste	Construction site waste (during construction)  Solid waste (during maintenance)	Low to moderate	Adequate storage of products and waste (waterproof storage); Disposal of waste to authorized public landfills. Hygiene in construction sites Prohibition of waste in the open air

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			<p>Roadways and sites for waste collection and disposal will be identified for the main types of waste typically generated by demolition and construction activities.</p> <p>Mineral construction and demolition waste will be segregated from general waste, organic, liquid and chemical waste through on-site sorting and placed in appropriate containers.</p> <p>Construction waste will be collected and disposed of appropriately by licensed collectors</p> <p>Waste disposal records will be maintained as evidence for the appropriate management planned.</p> <p>Where appropriate, the contractor will reuse and recycle suitable and viable materials (except for asbestos). To this a waste management manual will be developed for all wastes.</p> <p>All these provisions must be reported in the Contractor's ESMP-W</p>
8. Hazardous toxic waste (including medical waste)	Management of hazardous toxic waste	Low	<p>Temporary on-site storage of any hazardous or toxic substances will be conducted in secure containers that provide compositional data, properties and handling information for those substances (Safety Data Sheets) that can be used for staff awareness.</p> <p>Containers of hazardous substances must be placed in a leak-proof container to prevent spillage and leakage</p> <p>The waste is transported by specially authorized carriers and is disposed of at a site authorized for this purpose.</p> <p>Paints containing toxic ingredients or solvents, or lead-based paints will not be used</p> <p>In accordance with national regulations, the contractor will ensure that newly constructed and / or rehabilitated health care facilities have sufficient infrastructure for the management and disposal of medical waste; this includes and is not limited to: (i) Special facilities for separate health care waste (including "sharps instruments" for soiled instruments and human residues or liquids) from other waste disposal systems , clinical waste: yellow bags and containers; special boxes resistant to perforation; household waste (non-organic): black bags and containers (ii) appropriate storage facilities for medical waste are in place; and (iii) If the activity includes institutional treatment, appropriate elimination options should be in place</p>
9. Asbestos	Management of asbestos	Low	<p>If asbestos is detected at the project site (demolition work), it must be clearly marked as a hazardous substance.</p> <p>If possible, asbestos will be suitably contained and sealed to minimize exposure</p> <p>Before removal (if such removal is necessary), asbestos will be treated with a wetting agent to minimize the amount of asbestos dust</p> <p>Asbestos will be treated and eliminated by qualified and experienced professionals</p> <p>If asbestos-containing materials are to be stored temporarily, the waste must be safely placed in closed containers and reported in an appropriate manner.</p> <p>Asbestos removed will not be reused</p>
10. GHG emissions	Exhaust gas	Low to moderate	Regular maintenance of construction machinery and vehicles
11. Vegetation	Some works involve the cutting or removal of vegetation (trees, shrubs) and the reduction or destruction of green spaces.	Low	<p>Establishment of a green zone</p> <p>Search for alternative solutions (to avoid cutting trees)</p> <p>Tree planting to compensate for the possible destruction of green spaces and the shortfall in terms of CO<sub>2</sub> sequestration capacities</p>
12. Air quality	Negative potential impact of heavy	Moderate	Air pollution control system (compliance with standards for exhaust emissions from

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	machinery on construction sites and vehicles		construction equipment (work phase). Watering of construction sites; Systematic removal of unused embankments
13. Atmospheric pollution	The sites could contribute to increase air pollution and dust generation. Increased pollution and improper storage of materials and displacement and use of materials	Low to moderate	Adoption of strict safety standards in areas close to construction sites. Use of techniques to mitigate this risk in construction sites Organization of public awareness and information campaigns Watering the building sites
14. Noise pollution	Increased noise and vibration (rolling stock, jackhammers, air compressors)	Low to moderate	Establishment of regular control measures of the intensity of noise pollution Sound measurements according to NT 48.04 (ISO.1996 / 1) in case of complaints or perception of exceedance by controllers Respect of working hours on construction sites Noise from construction activities will be restricted to the schedule agreed in the permit During operation, the engine covers of generators, air compressors and other mechanical equipment shall be closed, and the equipment will be placed as far as possible from the residential areas.
15. Health and safety of workers, residents and users	Accidents in construction sites Workers falling from scaffolding (the most common of accidents)	Moderate	Establishment of safety rules and procedures in construction sites and application of instructions and rules of hygiene Staff management Helmets door by workers Warning signs for places at risk Integration in the execution procedures a risk analysis that takes into account all identified risks To Sensitize staff on health & safety issues at work at hiring and regularly (minimum one a week) throughout the work period
16. Building safety	Risk of fires and explosions	Low	Respecting NDMA's regulations (building safety and prevention of fire and explosion risks). Installation of smoke detectors, fire extinguishers and alarm devices. To Sensitize staff on using fire extinguishers and alarm advices To do simulation exercises
17. Traffic and pedestrian safety	Direct or indirect hazards to public traffic and pedestrians through construction activities	Low to moderate	In accordance with national regulations, the contractor must ensure that the construction site is properly secured, and that traffic related to the construction is regulated. This includes, but is not limited to, signage, warning signs, gates and diversions: the site will be clearly visible and the public warned of all potential dangers Traffic management system and staff training, particularly for site access and dense traffic near the site. Provide safe crossings and passages for pedestrians when construction traffic interferes. Adjustment of working hours to local traffic patterns Active management of traffic by trained and visible staff on the site, if necessary, for a safe passage and convenient for the public. Provide safe and continuous access to offices, stores and residences during renovation activities, if the buildings remain open to the public.

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18. Child labor	Use by contractors of child labor	Low	Strict compliance with national regulations on child labor by works contractors
19. Disabled people	Neglecting disabled people in building plans and rehabilitation of buildings	Low to moderate	Accessibility mechanisms for persons with disabilities in public buildings (access ramps, sanitary blocks, etc.)
20. Restauration of historic buildings	Neglecting the historic value of buildings	Low to moderate	Notify the local competent authorities and obtain the authorizations / permits. Full compliance with heritage management regulations regarding buildings of historical value.
21. Archaeological, cultural and historical heritage	Neglecting historical heritage	Low	Ensure that arrangements are in place to ensure that artefacts or other "finds" encountered during excavation or construction are noted, that officials are contacted and that work is delayed or altered to accommodate these discoveries. Compliance with national regulations for the protection of historical and cultural property. See also Annex 3.

*(\*) A more specific level of risks will be established during the preparation of the ESMP of each sub-project.*

## VI. ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

### VI.1 Screening of sub-projects

58. The activities within the context of the ACE Impact Project must be subjected to *an environmental and social screening*, a procedure aimed to:

- ▶ Determine the nature and the extent of their anticipated adverse environmental and social impacts;
- ▶ Define the most appropriate backup tool, depending on the nature and extent of these impacts;
- ▶ Establish and implement appropriate mitigation measures.

### VI.2 Environmental and social management tools

42. Screening of sub-projects (individual sites for the construction, rehabilitation or extension of buildings) is an important element of the environmental and social management process (see Inset below).

#### Harmonizing National and World Bank Procedures

**Under the ACE impact Project**, the following sub-projects will be considered *ineligible*:

- ▶ **World Bank Category A subprojects**, which may have very negative, diverse, irreversible environmental and social impacts.
- ▶ Sub-projects for which the World Bank operational policies are not triggered (i.e; *OP 4.04 Natural Habitats; OP 4.12 Involuntary resettlement; OP 4.09, Pest Management; OP 4.10: Indigenous Peoples; OP 4.36: Forests; OP 4.37 Safety of Dams; PO 7.50 International Waterways; and PO 7.60, Disputed Areas*).

**In terms of Gambian procedures** (in compliance with the 1994 *National Environmental Management Act (NEMA)*):

- ▶ The **National Environment Agency (NEA)** is responsible for regulating Environmental Impact Assessment (EIA).
- ▶ All development projects are subjected to environmental screening.
- ▶ Prior to granting permission to proceed with a project, a proponent is obliged to complete a **Pre-evaluation Form** that has been developed by the NEA.
- ▶ The nature, type and location of the project is described in the environmental screening form with a preliminary indication of potential socio-economic and biophysical impacts (number of people/ communities affected, sensitive habitats, threatened species, etc.).
- ▶ NEA invites **public comments** on statements of project intent submitted to it especially from those most likely to be affected by a proposed.
- ▶ NEA classified projects and decides on whether a full **Environmental Impact Assessment (EIA)** is required.

**In terms of World Bank requirements** (in compliance with POs 4.01 and 4.11):

- ▶ An **Environmental and Social Information Sheet (ESIS)** will be drawn up (to complement – if needed - national forms).
- ▶ The screening process would be complemented by the parallel preparation of a **Simplified Screening Form (SSF)** (see the template in Annex 4) to make it possible, among other things, to determine from the outset – in a direct and concise way - the scope and level of potential negative environmental and social impacts of any activity, as well as define the social management tool which is required.
- ▶ For subprojects whose environmental and social impact will be considered **low**,
- ▶ For sub-projects whose environmental and social impacts will be considered **moderate**, an **Environmental and Social Management Plan (ESMP)** will be prepared , even if,

because of the nature of the works, Gambian procedures do not require the preparation of a full EIA. (See terms of reference and content of the ESMP in Annex 5).

- An ESMP is a detailed plan and schedule of measures necessary to minimize, mitigate or control any potential negative environmental and social impacts identified under the ACE Impact Project. An ESMP consists of a set of generic mitigation, monitoring and institutional measures to be taken during implementation and operation of the proposed project to eliminate negative environmental and social impacts, offset them or reduce them to acceptable levels.
- ▶ Key results of the ESMP will be included in the *Worksite-ESMP* to be prepared by the contractor (see Annex 6). See also Annex 7 for an indicative list of environmental measures.

*Public consultations* with key stakeholder will be held during the entire process.

Under the ACE Impact Project, an adequate *Grievance Redress Mechanisms* will be set up at the level of each participating university (E-system). Within this system, all environmental and social related complaints and grievances will be addressed in a timely, effective and efficient manner.

59. To qualify as eligible, any sub-project with potential environmental and social risks must include *a budget line* to cover the costs of implementing any measures to mitigate environmental and social risks (negative impacts). This is a direct consequence of the legal "polluter pays" principle, which will apply to any sub-project regardless of its size and importance.

- ▶ In this perspective, mitigation measures are *an integral part of a sub-project*, which must themselves be considered as full-fledged investments.

Table 2: Screening Process: Objectives and Responsibilities

PHASE	ACTIVITY	OBJECTIVE	RESPONSIBILITY
<i>a) Site identification and sub-project</i>	<b>Identification of the sub-project</b>	Describe the nature of the activities of the sub-project and its main characteristics	Promoter of the subproject (unit of the participating university)
	<b>Preparation of the Pre-evaluation Form</b>		
<i>b) Screening of the submitted subproject and preparation of the type of backup instrument required</i>	<b>Preparation of the SSF</b>	Identify the nature and extent of the environmental and social impact of any sub-project	Safeguards Expert, in collaboration with NEA (with information to the WB).  SSF and/or ESIS sent to NEA for review and clearance
	<b>Categorization of the subproject</b>		
	<b>Preparation of an ESIS</b>	For sub-projects whose negative environmental and social impact is considered <i>minimal</i> .  [ESIS mitigation measures will be directly integrated into the tenders and specifications of the contractors].	
	<b>Analysis and validation of the results of the screening</b>	<ul style="list-style-type: none"> <li>• Verification of all the information.</li> <li>• Review of proposed mitigation measures</li> <li>• Categorization of subprojects and required safeguard tools</li> <li>• Decisions regarding the type of public consultation to be applied</li> </ul>	Safeguards Expert with external resource persons  Package sent to NEA for clearance.
	<b>Combined preparation of EIA and ESMP</b>	A combined EIA / ESMP will be prepared for subprojects with potential negative impacts are considered as <i>moderate</i>  Validation of the EIA/ESMP and issuance of the environmental permit.  ESMP mitigation measures will be directly incorporated into tenders and contractor technical specifications.	External firm / resource person (ToR validated by NEA, if needed). As the ToR is already included in the present ESMF, the WB no objection will be not needed.  NEA  PIU: coordinator and safeguards expert, with procurement officer)
<i>c) Communication and stakeholder engagement</i>	<b>Disclosure of information</b>	EIA / ESMPs and records of consultations will be made available to the public through the most appropriate means.	The participating university has the overall responsibility for information to the public, by involving the appropriate national authority
	<b>Public consultations</b>	Stakeholders	PIU
<i>d) Grievances</i>	Grievance management and redress mechanisms	A grievance management mechanism will be defined and put in place in place at	AAU will set up a regional E-system (with the participation of each

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		the site level (grievance of those directly or indirectly affected by Project activities).	university / center at national level): the center will solve grievances in first instance, including issues related to environmental and social safeguards.
<b><i>e) Monitoring &amp; control and reporting</i></b>	<b>Environmental and social monitoring</b>	Monitoring of the proper implementation of sub-projects in accordance with proposed environmental and social measures, national laws and WB's Safeguards Policies (against a set of indicators)  Maintenance and maintenance measures	PIU Safeguards Expert (with external TA).  Contractor: implementation of the EIA/ESMP environmental and social safeguard measures  External control by Government / state officers .
	<b>Reporting</b>	Preparation of an annual supervision report for safeguards at the regional level.	The safeguard consultant at AAU will develop this report based upon information from the PIU safeguards expert.
<b><i>f) Evaluations</i></b>	<b><i>Mid-term and final evaluation of the Project</i></b>	Assess the implementation of safeguards	Participation of the PIU Safeguard expert in the preparation of the evaluations (conducted by external consultants)
<b><i>g) Independent audit</i></b>	<b><i>Before mid-term review of the Project</i></b>	<b><i>Environmental/ social audit of all the sub-projects)</i></b>	To be commissioned by PIU

***(\* The different elements of this table will be specified during consultations and the forthcoming appraisal of the ACE Impact Project.***

## VII. MONITORING, CONTROL AND EVALUATION

### VII.1 Objectives of Environmental and Social Monitoring and Control

60. Environmental and Social monitoring is a crucial component of the ESMF during project implementation. The Project' Environmental and Social management Monitoring System aims to describe: (i) the elements to be monitored; (ii) monitoring methods and tools; (iii) the responsibilities for monitoring and reporting; and (iv) the periodicity of monitoring. The system aims to ensure that: identified mitigation measures are appropriate and affectively implemented, and produce the anticipated results; any additional impacts not identified in the analysis of the potential environmental and social impacts of the rehabilitation and/ or construction of facilities are captured as early as possible and are modified, discontinued or replaced if they prove to be inadequate; and, in addition, the assesses compliance with national environmental and social standards, as well as World Bank safeguard policies.

### VII.2 Responsibilities

61. Environmental and social internal monitoring is carried out by the Project 'Safeguard expert with the aim of ensuring that environmental and social safeguards of the project are adhered to. This monitoring will concretely include: (i) the inclusion of the mitigation measures recommended in the sub-project; (ii) the compliance oversight during the building activities; and (iii) the monitoring of environmental and social management measures in implementation of different activities.<sup>1</sup>

- ▶ The *National Safeguards expert* will be assisted by the *Regional Safeguard Consultant* at the *Regional Facilitation Unit (RFU)* (based in Accra, <), which has the role of ensuring consistent implementation and monitoring of ACE IMPACT environmental measures in all the countries concerned.

62. The *external environmental and social monitoring*, carried out by the NEA at its discretion, is intended to ensure compliance with national regulations on environmental and social protection and to verify the quality of implementation of environmental protection measures.

63. The knowledge acquired with these two forms of environmental and social monitoring will make it possible to correct the mitigation measures and possibly to revise certain standards of environmental protection.

64. The environmental monitoring system (which will cover the construction phase and post-construction clean-up) must include, in particular:

- The list of all the parameters requiring environmental monitoring;
- The measures and means envisaged to protect the environment;
- An intervention mechanism in case of observation of the non-compliance with the legal and environmental requirements or the commitments of the sub-project promoters;
- The contracting parties' commitments - to submit monitoring reports (number, frequency, content).

65. Annual verification of the execution of the measures is intended to ensure that the environmental and social mitigation measures are implemented in accordance with the described procedures in the ESMF.

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<sup>1</sup> Refer also to Table 2 (above)

### VII.3 Tracking Indicators

49. In order to assess the effectiveness of the sub-projects, including the construction and rehabilitation of buildings and their subsequent maintenance, the environmental and social indicators are shown in Table 3 below. Several of these indicators will be further defined in the ESMP for specific activities and will be regularly monitored during implementation of the subprojects. They will be specified in the Technical specification of the different building companies or contractors as well as those of possible subcontractors.

**Table 3 : Environmental and social management monitoring indicators**

Measure	Category	Indicator
Technical measures (screening a preparation of safeguard tools)	ESMP	Number of sub-projects screened
	W-ESMP	Number of ESMPs prepared, validated and approved
		Number of W-ESMPs prepared, validated and approved
Monitoring related measures	Environmental monitoring and control of sub-projects	Number of missions completed to monitor risk mitigation measures with report
Sensitization	Raising public awareness and advocacy on the environmental, health, safety and social issues of sub-projects and good practices	Number of people who benefited from these sessions (with percentage of women)
Grievance management	Management of grievances of persons directly or indirectly affected by Project activities	Number of grievances received
		Number of grievances treated

## VIII. ACTION PLAN: KEY RECOMMENDATIONS

66. This chapter presents the main recommendations of the ESMF's Action Plan of the ACE IMPACT Project in the Gambia.

**I. Environmental and social screening:** By Project effectiveness, each participating university must have undertaken the initial environmental and social screening of their Center implementation plan (sub-project). As part of the annual approval of the annual work plan (in particular the first two years), this screening will be updated. Notably, if any new construction has incorporated into the work plan.

**II. Qualified personnel:** Each selected university will use the services of a qualified staff/consultant identified or appointed that will implement the safeguard monitoring at the university level.

**III. Operational Manual:** The Project's *Operational Manual* must include a section on the basic principles and regulatory measures of the ESMF, indicating in particular:

- ▶ Subprojects' screening procedures.
- ▶ The respective responsibilities of different stakeholders (such as, issuance of environmental permit by the national environmental agency or preparation of complete Worksite ESMP, including a Safety and Hygiene Plan, by the contractors).
- ▶ Mechanisms to control and monitor environmental & social indicators.
- ▶ Costs of environmental and social safeguards.

**IV. Information, sensitization and training on environmental and social management (ESM) issues:** Information and sensitization sessions on ESM will be provided to the representatives of the institutional actors involved in implementation of the Project, including the companies in charge of the works. These initiatives (to be coordinated by the Project safeguards specialist, in collaboration with NEA, and the assistance of external resource persons) will take place immediately after Project effectiveness, during the first six months of implementation. Costs related to these trainings will be included in the overall project management costs of outreach / training / capacity building. Particularly important is the information sessions of entrepreneurs on the preparation of their various comprehensive Worksite-ESMP.

- ▶ Prior to Project effectiveness, the AAU will organize (with the support of WB) an **ACE Impact boot camp**: the training will involve all university teams and will address issues related to the execution of the ESMFs, including screening and implementation, reporting, and monitoring.
- ▶ Further, **annual training and monitoring sessions** will be held at the regional workshops (this will contribute to the preparation of the annual safeguard report based upon university reporting)

**V. Grievance redress mechanism:** The regional E-system, which will be created within each participating university / center, will solve all grievances in first instance, including those related to safeguards issues.

***Once it has been discussed, approved and validated by all stakeholders, this Action Plan will be binding.***

## **IX. ESTIMATED COSTS**

67. The budgeting for implementation of the ESMF will be done at two levels:
- ▶ ***At the level of each participating university:*** a budget of a maximum of ***USD 50,000*** to cover costs of technical measures related to environmental and social assessment procedures, including various capacity building initiatives and preparation and monitoring of ESIA's / ESMPs for sub-projects.
  - ▶ ***At the regional level:*** the AAU will reserve ***USD 200,000*** for the regional safeguard consultant, national and regional disclosures, and associated missions/workshops
68. All costs related to environmental and social risk mitigation measures will be included in the budgets of individual sub-projects.

## ANNEXES

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## Annex 1: EIA Procedures in The Gambia

The EIA procedure involves the following:

### (i) Screening Process

The objective of the project screening is to decide on the nature and extent of the environmental assessment needed for the project. It determines which activities are likely to have negative environmental and social impacts; determines the appropriate mitigation measures for activities with adverse impacts; incorporates mitigation measures into the project as appropriate; reviews and approves the project's proposals; monitors environmental parameters during implementation of activities.

The screening process is designed to determine which projects require a full EIA process. Screening is done with the aid of EIA « Screening Forms ». The screening process ensures objectivity and transparency.

### (ii) Screening Form

A standardized project brief is submitted by a developer using the « Screening Form ». The Screening Form requires that the developer provide information inter-alia on the following:

- Developer;
- Contact points;
- Location and size of the site/facility;
- Inputs required (utilities and raw materials);
- Products and by-products (finished products and wastes);
- Methods of waste disposal;
- Anticipated environmental impacts.

General information is required at this first stage. If in-depth analysis has already been done, results should be indicated on the screening form. If, however, only preliminary analysis/surveys have been done, this will in general suffice for the screening form.

Where the developer needs assistance to complete the screening form, a lead sectoral department or the NEA will be in a position to help. Upon completion by the developer, the form is submitted to the lead department or the Agency. If the form has been completed correctly, the lead department forwards the form to the Agency for consideration. The Agency determines the next actions in consultation with the lead department. If necessary, the Agency, the lead department, and/or the Working Group may visit the proposed project site to clarify details or complete the information required.

### (iii) Project Classification

Based on information obtained from the screening form, a systematic review of the information is completed by the Agency to determine whether an environmental impact study needs to be conducted. Evaluation criteria have been established which provide a general guide for determining whether or not a full EIA is required. This ensures a fair and consistent review of all proposed projects at this screening stage, based on the information provided by the project promoter. As a result of this screening, the project is classified in the following manner:

- Class A: Full Environmental Impact Assessment Required – If the Agency, either based on the screening form or after additional information has been provided, has enough reason to believe that the project will cause a significant negative impact on the environment, it will require that an environmental impact assessment be made in accordance with the provisions made below.

- Class B: Additional Information Necessary – In case where doubts remain as to the significance of potential impacts on the environment, further information is required. Projects rated as Class B will be required to provide additional information prior to the Agency making a decision on classification. In this case, the Agency will give the project proponent, in writing, a clear indication of the information that needs to be provided. The Executive Director reserves the right to determine what additional information is required.

After additional information has been provided, the Agency will reassess the proposed project and will determine if it falls into Class A or C.

- Class C: No Full Environmental Impact Assessment required – A project may be categorized as Class C if it is determined that the proposed project will have no significant or adverse impact on the environment. The Executive Director may grant environmental approval to the project without further analysis.

In cases where it is obvious that a project will not be in line with the laws of The Gambia, the Executive Director may reject a project without any obligation to carry out an EIA.

#### **(iv) Consultations with Relevant Government Ministries and Members of the Public**

The Agency, upon receiving a project brief consults the lead sectoral department. It invites public comments on statements of project intent submitted to it especially from those most likely to be affected by a proposed project. It is only subsequent to these two consultations that the Agency is required to invite interested organs of the State to comment on both the statement and the comments made there-on. A public enquiry is the final form of consultation. This style of consultation is unique with fluid and consistent geographical and sectoral nuances.

To facilitate the EIA process, the following arrangements are proposed:

- A special file is opened for every developer to properly document all the transactions and consultations for each EIA case. Where necessary deemed necessary an environmental and social statement may have to be submitted.
- The Agency designs standard letters to be issued to developers who have submitted Project Briefs. The letter specifies the class of EIA required.
- The Statement or its summary is published in local papers, also: (i) requesting members of the public to forward to the Agency any comments they may have and (ii) inviting the public to study and comment on the Statement which will be available at the Agency, the lead sectoral Department and the Offices of the Commissioner of the affected Division.
- The Agency, the developer, and the Permanent Advisory Group on EIA and interest groups hold consultative meetings with the communities after the public comments on a Statement.

## Annex 2: Managing the risks of adverse impacts from temporary project induced labor influx

Excerpts from MANAGING THE RISKS OF ADVERSE IMPACTS ON COMMUNITIES FROM TEMPORARY PROJECT INDUCED LABOR INFLUX (*Note prepared in 2016 by Operations Policy and Country Services (OPCS) and Environmental and Social Safeguards Advisory Team (ESSAT)*).<sup>2</sup>

Bank-financed investment projects often involve construction of civil works for which the required labor force and associated goods and services cannot be fully supplied locally for a number of reasons, among them worker unavailability and lack of technical skills and capacity. In such cases, the labor force (total or partial) needs to be brought in from outside the project area. In many cases, this influx is compounded by an influx of other people (“followers”) who follow the incoming workforce with the aim of selling them goods and services, or in pursuit of job or business opportunities. The rapid migration to and settlement of workers and followers in the project area is called labor influx, and under certain conditions, it can affect project areas negatively in terms of public infrastructure, utilities, housing, sustainable resource management and social dynamics.

The influx of workers and followers can lead to adverse social and environmental impacts on local communities, especially if the communities are rural, remote or small. Such adverse impacts may include increased demand and competition for local social and health services, as well as for goods and services, which can lead to price hikes and crowding out of local consumers, increased volume of traffic and higher risk of accidents, increased demands on the ecosystem and natural resources, social conflicts within and between communities, increased risk of spread of communicable diseases, and increased rates of illicit behavior and crime. Such adverse impacts are usually amplified by local-level low capacity to manage and absorb the incoming labor force, and specifically when civil works are carried out in, or near, vulnerable communities and in other high-risk situations. While many of these potential impacts may be identified in a project’s Environmental and Social Impact Assessment (ESIA), they may only become fully known once a contractor is appointed and decides on sourcing the required labor force. This means that not all specific risks and impacts can be fully assessed prior to project implementation, and others may emerge as the project progresses.

**Key Principles** that are key to properly assessing and managing the risks of adverse impacts on communities that may result from temporary project induced labor influx.

- Reduce labor influx by tapping into the local workforce.
- Assess and manage labor influx risk based on appropriate instruments.
- Incorporate social and environmental mitigation measures into the civil works contract.
- Risk of social conflict (conflicts may arise between the local community and the construction workers, which may be related to religious, cultural or ethnic differences, or based on competition for local resources).
- Increased risk of illicit behavior and crime
- Influx of additional population (“followers”) (people who expect to get a job with the project, family members of workers, as well as traders, suppliers and other service providers).
- Impacts on community dynamics.
- Increased burden on and competition for public service provision.
- Increased risk of communicable diseases and burden on local health services (the influx of people may bring communicable diseases to the project area, including sexually transmitted diseases (STDs), or the incoming workers may be exposed to diseases to which they have low resistance).

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<sup>2</sup> The full document may be found on-line :

<http://pubdocs.worldbank.org/en/497851495202591233/Managing-Risk-of-Adverse-impact-from-project-labor-influx.pdf>.

- Gender-based violence (inappropriate and criminal behavior, such as sexual harassment of women and girls, exploitative sexual relations, and illicit sexual relations with minors from the local community).
- Child labor and school dropout.
- Local inflation of prices.
- Increased pressure on accommodations and rents.
- Increase in traffic and related accidents.

### Annex 3: Procedures in Case of Fortuitous Discovery of Physical Cultural Property

It is possible that, during the implementation phase, Project activities may have unforeseen effects on physical cultural properties, particularly in case of incidental discoveries.

The "physical cultural property" to which the procedures of OP/ PB 4.11 apply are "*movable or immovable objects, sites, works or groups of works of archaeological, paleontological, historical, architectural, religious, aesthetic or other value*".

To this end, in accordance with the chance find procedures of World Bank:

- *Project officials* should ensure that ESMP / EIS *Terms of Reference* include aspects of incidental discovery of physical cultural property and that procedures for incidental discoveries are effectively provided for in construction contracts, in collaboration with legally responsible services.
- The contractor charge of the works must include in its *Environmental and Social Management Plan – Worksite* (ESMP-BS) and actually follow the procedures provided in case of incidental discovery of cultural property:
  - Beforehand, inform the workers about the goods concerned and the procedure to follow;
  - After discovery: secure the site; stop immediately the work in the case of an archaeological remains (cave, furnaces, cemetery, burial, old objects of art, figurines, statuettes);
  - Inform the local branch of the Ministry of Tourism and Culture and the National Council of Arts and Culture;
  - Delimit the site of the discovery;
  - Do not resume work unless authorized by the responsible local authorities and the Ministry of Tourism and Culture.

[Source: World Bank (2009) *Cultural Heritage in Environmental Assessment* (1994)]

See the full text of this document on-line:

<https://siteresources.worldbank.org/INTSAFEPOL/1142947-1116497775013/20507410/Update8 Cultural HeritageInEASeptember1994.pdf>

**Annex 4: Simplified Screening Form (SSF) for Environmental and Social impacts**

<p><b>1. Nature of the activity:</b></p> <p>.....</p> <p><b>2. SSF Number: .....</b></p> <p><b>3. Location:</b></p> <p>.....</p> <p><b>4. Name and address of the Promoter of the sub-project:</b></p> <p>.....</p>
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**A) GENERAL ELIGIBILITY**

Does the activity ...	Yes	No
Have an impact on areas for which the World Bank operational policies have not been triggered? In particular:		
<ul style="list-style-type: none"> <li>• Impact on Natural habitats, protected zones (<i>Under OP 4.04 Natural Habitats</i>)</li> <li>• Use of pesticides to control pests (<i>under OP 4.09, Pest Management</i>)?</li> <li>• Disrespect for human dignity, human rights, economic systems and cultures of indigenous peoples (<i>under OP 4.10: Indigenous Peoples</i>)?</li> <li>• Involuntary taking of land (<i>Under OP 4.12: Involuntary resettlement</i>)</li> <li>• Impact on forest health and quality (<i>under OP 4.36: Forests</i>)?</li> <li>• Serious consequences resulting in malfunctioning or stopping a dam (<i>under OP 4.37 Safety of dams</i>)?</li> <li>• Effects on waters of two or more states (<i>under OP 7.50 International waterways</i>)?</li> <li>• Sub-projects located in disputed areas (<i>under OP 7.60, Disputed areas</i>) ?</li> </ul>		

**If the answer is YES to one of these general eligibility questions: the sub-project is not eligible under the ACE IMPACT Project.**

**B) ENVIRONMENTAL IMPACT**

	Will the activity ...	Yes	No
1	Include removal and/or cutting of a considerable number of trees?		
2	Potentially affect the ecology of a protected area (e.g. interference on mammalian or bird migration routes)?		
3	Potentially affect geological or soil instability (e.g., erosion, landslides and subsidence)?		
4	Be located in an area threatened by silting?		
5	Is located in an area where there is no household waste management system?		
6	Generate non-hazardous waste that will be stored on the project site?		
7	Involve the use of an already over-exploited groundwater?		
8	Contribute to reducing the amount of water available to other local users?		
9	Is located in an area where there is no sanitation network?		
10	Occur in old establishments that may contain asbestos cement?		
11	Include large deep excavations?		
12	Have important potential accidental soil erosion, groundwater pollution and contamination?		
13	Greatly increase air pollution and dust generation?		
14	Greatly increase noise pollution and vibrations?		

- **If the answer is YES to one of these general eligibility questions:** An Environmental and Social Management Plan (ESMP) will be prepared in line with WB requirements – even if, because of the nature of the works, national procedures do not require the preparation of a PER or of an EIA.
- **If the answer is NO to all questions:** According to national regulations, a PER or an EIA will not be mandatory. However, in compliance with WB policies 4.01 and 4.11, the preparation of an SSF or, in certain cases, of a fully-fledged ESMP, will be considered as necessary.

## **Annex 5: Terms of Reference: Preparation of an ESIA / ESMP**

### **I. INTRODUCTION AND CONTEXT**

*This section of the ToRs will be completed at the appropriate time and will provide basic information regarding the nature and activities of a sub-project under the ACE Impact Project.*

### **II. OBJECTIVES**

*This section will: (i) present the objectives and activities planned under the specific sub-project (construction, rehabilitation or extension of buildings or other facilities); and (ii) indicate activities that may have environmental and social impacts and that require attenuation measures.*

### **III. TASKS OF THE CONSULTANT**

The consultant will be mandated to prepare a single document including an Environmental and Social Impact Assessment (ESIA) and an Environmental and Social Management Plan (ESMP) of the sub-project in accordance with national procedures for EIA and World Bank operational policies that were triggered under the Project (ie PO 4.01 Environmental evaluation and 4.11 Physical cultural resources). To do this, the Consultant should refer directly to the results of the analyzes and recommendations of the Project's Environmental and Social Management Framework (ESMF).

This document should be prepared with a level of detail sufficiently precise to be included in the tender for construction companies, in order to allow a correct estimate of the costs of these activities and to be part of the specifications of the successful bidder.

### **IV. THE MANDATE OF THE CONSULTANT**

- Prepare a complete ESMP (see Outline in appendix)
- Provide a general description of the characteristics of the environment in which the activities of the sub-project will take place.
- Highlight the major constraints that need to be taken into account when preparing the land, construction and during operation.
- Conduct a detailed risk analysis.
- Evaluate the potential environmental and social impacts due to sub-project activities.
  - Determine the significance of positive and negative impacts, direct and indirect impacts and immediate and long-term impacts associated with the sub-project
  - Identify risk mitigation measures.
  - Consider the potential impacts of a project on physical cultural resources and follow the required procedures.
- Analyze alternative options.
- Identify work supervision mechanisms
- Define the framework of information, consultation and public participation.
- Present institutional arrangements for the monitoring and reporting systems
- Describe the arrangements for handling complaints and resolving potential conflicts

### **V. QUALIFICATIONS AN PROFILE OF THE CONSULTANT**

- ▶ University degree at the Master's level (or equivalent), specialization in environmental sciences or geography or agronomy or development studies or affiliated disciplines.
- ▶ At least 5 years of experience conducting environmental studies or environmental assessment of projects or implementing environmental initiatives.

*APPENDIX: General Outline of the ESMP*

The ESMP will include the following elements:

1. Description and rationale of the sub-project (area, area, population affected, etc.)
2. Role of key stakeholders and definition of their responsibilities
3. Identification of the eligible beneficiaries of the sub-project and the persons affected
4. Detailed presentation of the main potential environmental risks (pre-construction phase, work phase, maintenance phase)
5. Detailed presentation of the various technical measures envisaged to mitigate the risks
6. Framework concerning the Information, Consultation and Participation of stakeholders
7. Presentation of training initiatives and capacity building
8. Presentation of work supervision mechanisms
9. Definition of monitoring indicators and control of mitigation measures
10. Outline of the program for monitoring the implementation of the mitigation measures
11. Definition of the monitoring, supervision and control system
12. Schedule of implementation of sub-project activities
13. Description of the organizational responsibilities for the implementation of the sub-project
14. Description of the arrangements for handling complaints and settling potential conflicts
15. Definition of reporting system (fact sheets)
16. Presentation of the public disclosure system of the ESMP
17. Detailed budget

**Annex 6: General Outline of a Worksites-Environmental and Social Plan (W-ESMP)**

*(To be prepared by a contractor. A simplified ESMP-W will be prepared by small enterprises involved in minor works)*

1. ENVIRONNEMENTAL POLICY OF THE CONTRACTOR: General Statement
2. OBJECTIVES
  - 2.1 Preparation of the ESMP
  - 2.2 Responsibilities of the Contractor
  - 2.3 Responsibilités of sub-contractors
  - 2.4 Documentation related to monitoring and control
  - 2.5 Security and Hygiene Plan (SHP)
  - 2.6 Implementing and updating the W-ESMP
3. ENVIRONNEMENTAL MANAGEMENT SYSTEM
  - 3.1 Responsibilities of the contractor
  - 3.2 Sub-contractors
  - 3.3 Planning the Environment, Health, Hygien and Security documentation
  - 3.4 Request for approval of site
  - 3.5 Management of non compliances
  - 3.5 Humain resources
  - 3.6 Controls
  - 3.7 Reporting
  - 3.8 Notification of accidents
  - 3.9 Internal regulations
  - 3.10 Training on Environmentn Health, Hygien and Security
  - 3.11 Standards
4. PROTECTION OF THE ENVIRONMENT
  - 4.1 Protection of sourrounding areas
  - 4.2 Selection of escavation and site access areas
  - 4.3 Effluents
  - 4.4 Water management
  - 4.5 Rivers and streams
  - 4.6 Emissions and dust
  - 4.7 Noises and vibrations
  - 4.8 Waste management
  - 4.9 Clearing of vegetation
  - 4.10 Erosion and sedimentation
  - 4.11 Cleaning up after works
  - 4.12 Documentation concerning the site (after the works)
5. SECURITY AND HYGIENE
  - 5.1 Safety and hygien plan
  - 5.2 Daily and weekly meetings
  - 5.3 Equipment and operating standards
  - 5.4 Working licenses
  - 5.5 Equipment and individual protection
  - 5.6 Hazardous material
  - 5.7 Emergency planning
  - 5.8 Ability to work
  - 5.9 First help
  - 5.10 Health center and medical staff
  - 5.11 First aid kits
  - 5.12 Emergency medical evacuation
  - 5.13 Health care access
  - 5.14 Medical moitoring

- 5.15 Sanitary repatriation
- 5.16 Hygiene
- 5.17 Sexually transmitted diseases and infections
- 5.18 Substance abus

**6. LOCAL WORKFORCE AND RELATIONS WITH THE COMMUNITIES**

- 6.1 Local recruitment
- 6.2 Transportation and housing
- 6.3 Meals
- 6.4 Damage to people and property
- 6.5 Occupation or acquisition of land
- 6.6 Traffic and rolling stock management

**7. ADDITIONAL AND SPECIFIC MEASURES**

- 7.1 Security in risk areas
- 7.2 Relations with neighboring communities
- 7.3 Grievances management
- 7.4 Gender issues
- 7.5 Procedure in case of incidental discovery (chancefinds) of arcegeological artifacts
- 7.6 Internal audits

**ANNEXES**

ANNEX 1 : Mitigation mesures: Pre-construction

ANNEX 2 : Mitigation mesures : Construction phase

ANNEX 3 : Responsibilities to monitor and control the implementation of mitigation mesures

## Annex 7: Indicative List of Environmental Measures

These measures could be included (partially or entirely) as environmental and social clauses in contracting firms' contracts.

### 1. Prohibited Actions

The following actions are prohibited on the subproject site or in its immediate vicinity:

- Cut trees outside the construction zone;
- Use unauthorized raw materials;
- Intentionally destroying a discovered physical cultural resource;
- Continue to work after discovering an archaeological remains (cave, cave, cemetery, burial ground);
- Use firearms (except authorized guards);
- Consume alcohol on the job site and during working hours.

### 2. Management Measures

**2.1 Environmental Measures Management** (precautions to be taken by the building company during the works to avoid the occurrence of nuisances and impacts).

- Waste management
  - Minimize the production of waste and then eliminate it;
  - Set up controlled assembly sites;
  - Identify and classify potentially hazardous waste and apply specific disposal procedures (storage, transportation, disposal);
  - Entrust the disposal to the approved professional structures;
  - Store and dispose of construction waste consistent with national regulations
- Equipment maintenance
  - Delimit garage, repair and maintenance areas (washing, emptying) of materials and equipment away from any source of water;
  - Carry out maintenance on the demarcated areas;
  - Properly manage the draining oils.
- Fight against erosion and filling of water courses
  - Avoid creating trenches and deep furrows along developed access roads;
  - Avoid disposing of loose materials on sloping ground;
  - Erect protections around borrow pits and deposits of fine soft materials
- Materials in reserves and loans
  - Identify and delineate areas for stockpiled materials and borrow pits, ensuring that it is at a safe distance (at least 50 m) from steep slopes or erosion-prone soils and drainage areas. water close;
  - Limit the opening of borrow pits to the strict minimum necessary.
- Fight against dust and other nuisances
  - Minimize dust emission to avoid or minimize negative consequences influencing air quality
  - Limit speed to 24 km / h within 500 m of the site;
  - Regularly water areas prone to dust emission during the day;
  - Respect the hours of rest for work in residential areas in the city, or during school hours for repairs and rehabilitations.

**2.2. Safety management** (safe layout on the site to be taken by the contracting company, according to national health and safety standards and the World Bank Group's *Environmental, Health and Safety Guidelines* for the benefit of the workers and adequate signage of the site to avoid accidents).

- Properly and permanently sign site access roads and hazardous areas of the site;
- Make staff aware of the wearing of safety equipment (nose cover, glove, helmet, etc.);
- Regulate traffic on leaving school;
- Interrupt all work during heavy rains or in case of emergency.

### 2.3 Relations with the neighborhood

- Inform local authorities about the detailed schedule of work and the risks associated with the site;
- Systematically recruit local workers of equal competence;
- Contribute to the maintenance of tracks used by vehicles serving the site;
- Avoid supply disruption of basic services (water, electricity, telephone) due to work otherwise inform at least 48 hours in advance;
- Do not work at night. Otherwise, inform the local authorities at least 48 hours in advance.

**2.4. Implementation of “Chance Find Procedure”.** Its application makes it possible to safeguard the historical vestiges for the benefit of the culture and the economic activities like the tourism. It consists in alerting the competent authority in case of discovery of vestige (objects of ancient art, archaeological vestiges, etc.) during the opening and the exploitation of the quarries and pits of loan, and during the scours for the constructions themselves. same. It will be for the contractor to:

- To inform workers of the goods concerned and the procedure to be followed;
- Immediately stop the work in the case of an archaeological remains (cave, cave, furnaces, cemetery, burial) pending the decision of the competent authority;
- In the case of objects (figurines, statuettes) circumscribe the area and alert the competent authority;
- Do not resume work unless authorized by the competent authority.

Annex 8: Minutes of the Public Consultation



8 JULY 2019

**MoHERST (ESMF) National Validation Workshop Report**

**Introduction:**

The NEA and its stakeholders validated *Environmental and Social Management Framework (ESMF)* presented by Ministry of Higher Education, Research, Science and Technology (MoHERST). The *Environmental and Social Management Framework* of the Africa Centers of Excellence, Impact for Development Project was prepared for The Gambia through a Consultancy of the World Bank and the Association of African Universities (AAU) on behalf of the Ministry of Higher Education, Science, Research and Technology (MoHERST).

The Framework provides a general view of the environmental and social conditions under which the Project is implemented. In order words, the project came to establish an Emerging Center of Excellence as part of the transformation of the Gambia Technical Training Institute (GTTI) into a University of Science, Engineering and Technology (USET). This University will serve as a training for students pursuing degree programs in the applied science, engineering and technology.

**Opening Remarks:**

The meeting was chaired by Mr. Omar Bah, Acting Director Inter-Sectorial Network at NEA. During his opening remarks, he welcomed and thanked the participants for their response despite receiving invitation letters on short notice. This was followed by an opening prayers and introduction of participants.

The Executive Director of National Environment Agency (NEA), in his opening remarks thanked the participants for leaving their busy schedule to attend this important validation meeting. He implored the gathering to ensure due diligence on the document for successful implementation of the project. The validation of this project document should be able to identify possible potential negative impacts for possible mitigation, he further remarks.

Mr. Yusupha Touray, on behalf of Permanent Secretary of MoHERST informed the stakeholders that the project is a national design to improve our Education Sector and showed delight in coming to NEA, a long-standing partner, once again for similar validation. He further went to say that establishing an Emerging Centre of Excellence, thus transforming GTTI into a University will not affect the running of most of the certificate and diploma courses currently offered at the Institute. He highlighted that the business of education will

change as students in the Emerging Center will focus on application which will make them fit neatly in the labour market, either by being gainfully employed or being the employers themselves. Socio-economically, this will add another success story for the Gambian people. Mr Touray implored that he has no doubt that the stakeholders will go through the document with impartiality.

**Presentation Highlights:**

The presentation was delivered by Mr Yusupha Touray from MoHERST, during which he explained the three different components of the project; and that this is a follow-up on the draft document being sent to stakeholders for their review and inputs. During his presentation, it was highlighted that the project will enhance students' knowledge in the areas of engineering and entrepreneurship. It will also sponsor students and lecturers in the areas of Bachelors (BSc), Masters (MSc), and Doctorate (PhD) degrees in the above-mentioned fields. A total of US\$12 million has been allocated for the whole project.

The project will run at the GTTI Campus in the first year. During this period, a single structure (an eight-classroom block) will be refurbished for the conduct of classes for first-year students and administration of the Project. Meanwhile, the Government of The Gambia through support from international donor partners will build more structures for USET, which will also accommodate the Emerging Center of Excellence as a College of Engineering.

He further informed the gathering that The Gambia is working with Kwame Nkrumah University of Science and Technology (KNUST) for the mentoring and training of both the academic and administrative staff of GTTI, specifically on the establishment of the Emerging Center.

The activities of the project will be overseen by a National Steering Committee, which will comprise different stakeholders to ensure that the project is successfully implemented through a robust monitoring process. As part of the work to be done the Gambia will engage in:

- Construction of buildings: this will include the rehabilitation an existing building to be used for classes;
- Create awareness among stakeholders on the project activities;
- Capacity and institutional needs assessment;
- To conduct a comprehensive assessment on the existing structures especially on the environment aspect, e.g. soil structure, climate change, population impact, etc. The Gambia EIA is sufficient to conduct these activities; and
- The project document should incorporate or highlight stakeholders' comments. This should then be submitted to NEA for decision making as the regulatory institution.

**Observations / Comments Made During the Presentation:**

- The need to present the design before the steering committee for their observation prior to start of construction. All designs within the project should take into account the needs of different persons including gender needs and persons with different abilities/limited mobility. And these should reflect on the toilets as well as classrooms;

- The need to develop a Memorandum of Understanding (MoU) between NEA and MoHERST to support the implementation of the project, more so in the issues relating to the ESMF;
- The need to ensure proper monitoring of the project to ensure compliance with set standards and safeguards policies;
- Considering the space of GTTI, the project management should consider alternative sites in the country for the implementation of the project in the latter period of the project cycle;
- The need to conduct site specific ESMP for the project to help identify all impacts (real or potential risks) and report thereof submitted to the Agency prior to commencement of the project implementation;
- The need to provide insurance cover for workers as part of the Contract Bidding document to make it binding on contractors during the implementation;
- The need to setup an independent body to be charged with grievance redress during the implementation of the project;
- Insertion of identified safeguard measures in the Bid documents for the contractors to be bound by these and implementation to be fully monitored;
- Publication of the ESMF on the Website of the Ministry of Higher Education of The Gambia, and the external website of the World Bank; and,
- The final design of the project to wait until the site specific ESMP is approved.

### **Closing remark**

Mr. Muhammed Jallom Jabang (SPO-EQ) of NEA thanked the participants for their vital contributions to the presentation and the recommendations or observations made. He remarked that this is a national document and justice has been done to it for a smooth implementation, he stressed. He finally thanked the participants on behalf of the Executive Director and the entire NEA staff for their valuable contributions.

### **Potential participants of the Consultation would be the representatives of:**

- ▶ Non-governmental organizations (working on environment and education)
- ▶ Businesses (representatives of national medium and/or small building companies)
- ▶ Neighborhood associations,
- ▶ Representative of university department and faculty professors
- ▶ Associations of graduate and post-graduate students
- ▶ Etc.