

Republic of Senegal

Ministry of Territorial Collectivities of Development and Land Use Planning

CASAMANCE ECONOMIC DEVELOPMENT PROJECT (CEDP) P175325

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP) Draft

January 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of the Republic of Senegal (hereafter referred to as the Recipient) shall implement the Casamance Economic Development Project (CEDP) through the Ministry of Territorial Collectivities, Development and Land Use Planning, which oversees the CEDP Project Coordination Unit (PCU), the entity responsible for implementing the project. The International Development Association (IDA) (hereinafter referred to as the Association) has agreed to provide financing for the project in the form of a Credit.
2. *The Recipient* shall, and shall cause the PCU to, ensure that the Project is implemented in accordance with the Association's Environmental and Social Standards (**ESSs**) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, to be carried out or caused to be carried out by the Recipient, including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted, adopted and implemented under the ESCP and the ESSs, in a manner acceptable to the Association.
3. The Recipient shall also comply with the provisions of all the environmental and social documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF) including the Action Plan for Mitigation and Responses to Exploitation and Sexual Abuse and Sexual Harassment (ESA/SH) (ESA/SH Action Plan), the Resettlement Policy Framework (RPF), the Stakeholder Engagement Plan (SEP) including a Grievance Redress Mechanism (GRM), and the Labor Management Procedures (LMP). Other documents shall be prepared according to the timing indicated in the ESCP. These include Environmental and Social Impact Assessments (ESIAs) with Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAPs), including livelihood improvement plans where necessary. The deadlines specified in these E&S instruments shall be followed and maintained up to date by the Recipient.
4. The Recipient is responsible for compliance with all ESCP requirements, even where the implementation of specific measures and actions is the responsibility of the ministry, unit, or public agency mentioned in paragraph 1 above.
5. The implementation of the specific measures and actions defined in the present ESCP shall be permanently monitored by the Recipient, and periodic reports shall be communicated to the Association, in application of the provisions of the ESCP and the conditions of the legal agreement, while the Association shall ensure the monitoring and evaluation of the progress and realization of these specific measures and actions, throughout the Project implementation.
6. As agreed by the Association and the Recipient, this ESCP may be revised from time to time during the implementation of the Project, in a manner that reflects the adaptive management of changes or unforeseen situations that may arise in connection with the Project, or in response to an assessment of Project performance conducted under the ESCP itself. In such situations, the Recipient, through the Project Management Unit (PMU), shall agree on these changes with the Association and revise the ESCP accordingly. The agreement on the

modifications made to the ESCP shall be attested by the exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.

7. When the Project performance, unforeseen situations or Project changes occurring in the framework of its implementation, result in changes to the risks and effects during the implementation of the Project, the Recipient shall provide additional funds, where appropriate to carry out actions and measures to address these risks and effects/impacts that may include environmental and social risks, health, safety for the populations, risks related to the influx of labor seeking employment, the risk of degradation of natural resources and pollution of the physical environment (soil, air, surface and ground water, noise on the construction sites), the risk of disrupting the free movement of people and goods, the risk of social conflicts, and the risks to the health and safety of the population (including outbreak of diseases among the population and workers, accidents linked to construction site activities, health risks linked to poor management of waste from the shipyards, loss of land and property, and gender-based violence - sexual harassment, rape, unwanted pregnancies among the Recipient populations, etc.); and risks related to child labor.
8. The table below presents the important measures and actions required, the responsibilities of the actors involved in the Project, and the timeframes for implementing the selected measures and actions.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association environmental, social, health and safety (ESHS) monitoring reports of the Project, including but not limited to the implementation of the ESCP, the degree of preparation and implementation of environmental and social instruments required under the ESCP, Stakeholder engagement activities and the functioning of the Grievance Redress Mechanism including those related to Gender-Based Violence/Sexual Exploitation and Abuse (GBV/SEA), Sexual Harassment (SH)/Violence Against Children (VAC) and Project workers.</p>	<p>Quarterly, no later than the 5th of the month following the end of the quarter, throughout Project implementation.</p> <p>A compilation of these reports shall be made on a quarterly basis and sent to the Bank starting at 3 months after effectiveness date.</p>	Project Coordination Unit (PCU)
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of all incidents or accidents directly or indirectly related to or affecting the Project and likely to have serious consequences for the environment, communities, the public, or personnel.</p> <p>As an indication, any accident related to the Project or any allegation of GBV/SEA/SH related to the Project should be reported immediately</p> <p>The notification shall include sufficient details of the incident or accident, including the causes and measures taken or to be taken without delay to remedy the incident or accident and any information made available by any supplier/service provider or supervising entity, where applicable.</p> <p>A model incident or accident notification form shall be shared with all suppliers and service providers.</p>	<p>Incidents and accidents shall be reported immediately to the Task Team Leader (TTL) in writing, no later than 48 hours after learning of the incident or Accident; within 24 hours in case of a fatality</p> <p>Upon request, a detailed report on specific information, (including causes, consequences, actions taken, etc.), shall be provided within a period acceptable to the Association.</p> <p>This systematic notification system shall be in force throughout the Project Implementation.</p>	Project Coordination Unit (PCU)
C	<p>MONTHLY REPORTS FROM SUPPLIERS AND PROVIDERS</p> <p>Require suppliers and contractors to prepare and submit monthly monitoring reports to the PCU, including implementation of environmental, social, health and safety requirements.</p> <p>Share the reports with the Association.</p>	<p>Monthly and throughout Project implementation</p>	Project Coordination Unit (PCU) Contractors and subcontractors

D	<p>CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC)</p> <p>Prepare an addendum to the ESMF to cover the activities of the CERC at the time of preparation of the CERC Manual. The addendum shall be approved by the Association.</p> <p>In the event of an emergency leading to the activation of the Project's CERC, the Recipient shall prepare the necessary instruments and measures before undertaking the emergency response activities to ensure compliance with the E&S measures of the project.</p> <p>These instruments shall be submitted to the Association for approval</p>	<p>Before the beginning of the emergency response activities. The request to activate the CERC shall come from the Recipient.</p>	<p>Project Coordination Unit (PCU)</p>
ESS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure (Project Coordination Unit) with qualified staff and resources to support environmental and social risk management.</p> <p>As part of the implementation of the Project, an Environmental Safeguard Specialist with expertise in OHS and a Social Safeguard Specialist with solid experience in stakeholder engagement, GRM operationalization, and GBV/SEA/SH issues shall be recruited with qualifications and experience under terms of reference acceptable to the Association, to support environmental and social risk management.</p> <p>In addition, the Project shall also rely on the Direction of Environment and Classified Facilities (DEEC) / Regional Directions of Environment and Classified Facilities (DREEC) of Ziguinchor, Kolda and Sédhiou to support the PCU in the environmental selection or screening process that shall allow the identification of</p>	<p>An organizational structure comprising two (2) specialists (an Environmental Safeguard Specialist with expertise in OHS and a Social Safeguard Specialist) shall be established after Effectiveness.</p> <p>The organizational structure, must be maintained throughout the implementation of the Project. The Specialists shall be mobilized after Effectiveness.</p> <p>The Project shall establish an agreement with DEEC to define its tasks.</p>	<p>Project Coordination Unit (PCU)</p>

	<p>the environmental and social Impact Assessment (ESIA, AEI) to be carried out for each subproject.</p> <p>Monitoring Contractors and Missions shall also be required to establish and maintain an organizational structure with qualified and appropriate staff and resources to assume responsibility for managing environmental and social risks and impacts, including specialists in environmental, social, health, and safety risk management.</p>		
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Adopt and implement the Environmental and Social Management Framework (ESMF) prepared for the Project in a manner acceptable to the Association. The ESMF will be consulted upon, approved, and disclosed.</p>	ESMF to be disclosed prior to project appraisal	Project Coordination Unit (PCU)
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Prepare and implement the following risk management and assessment tools and instruments (frameworks and plans):</p> <ul style="list-style-type: none"> ▪ The Environmental and Social Management Framework (ESMF) is developed and includes an assessment and mitigation measures of the Project's environmental and social risks and impacts, including contextual risks, risks related to GBV/SHA, and vulnerable groups. Environmental and social measures are proposed as part of the project implementation. ▪ Resettlement Policy Framework (RPF), ▪ Stakeholder Mobilization Plan (SEP), ▪ Labor Management Procedures (LMP), ▪ An Environmental and Social Commitment Plan (ESCP) is prepared and shall be implemented. ▪ Other safeguard tools and instruments shall be prepared once the technical studies are completed and the sub-projects are known and after the Preliminary Review of all sub-projects following the Environmental and Social Management Framework (ESMF) prepared for the Project, such as Environmental and Social Impact Assessments (ESIA), Resettlement Action Plans (RAPs) Social and security assessment 	<p>Before project appraisal</p> <p>Specific Environmental and Social Assessments (ESIA, EIA, ESMP, Environmental Audit etc.) shall be prepared before the start of sub-projects for which these instruments are required and submitted to the Association for approval. Once approved, the environmental and social plans are implemented throughout project implementation.</p> <p>Before the start of the sub-projects, the specific instruments shall be prepared and implemented and monitored</p>	Project Coordination Unit (PCU)

	Subsequently, the Environmental and Social Management Plans (ESMPs) of the sub-projects established and adopted shall be implemented in a manner acceptable to the Association.	throughout the implementation of the Project. At project inception and before the start of activities.	
1.4	<p>MANAGEMENT OF SUPPLIERS AND SERVICE PROVIDERS</p> <p>Integrate relevant aspects of the ESCP, including the ESMF, RPF, GRM, SEP, LMP, GBV Plan, into the ESHS specifications of bidding documents and contracts with contractors and subcontractors.</p> <p>Ensure that contractors and subcontractors comply with the ESHS specifications of their respective contracts, meet deadlines and provide quality services and regular reports.</p>	<p>During the preparation of the bidding documents and prior to the start of the works</p> <p>Prior to the signing of the contract and the start of works.</p> <p>Application of these measures during the entire period of the Project Supervision of contractors and subcontractors throughout Project implementation</p>	Project Coordination Unit (PCU)
ESS2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Develop and implement Labor Management Procedures (LMP).</p> <p>Prepare site-specific labor management plans as part of site-specific ESMPs, based on the LMP.</p> <p>Conduct the analysis of working conditions by integrating the Coronavirus disease (SARS CoV2) context to ensure workers' health and safety throughout the project cycle.</p>	<p>The LMP shall be in place prior to project appraisal.</p> <p>Before workers start working for contractors and subcontractors</p> <p>Throughout Project implementation</p>	Project Coordination Unit (PCU) Contractors and subcontractors
2.2	<p>GRIEVANCE REDRESS MECHANISM FOR PROJECT WORKERS (GRM)</p> <p>Establish a specific GRM for labor complaints and issues to deal with disputes arising in this context, as described in the Labor Management Procedures and consistent with ESS2.</p>	<p>GM in place prior to hiring workers</p> <p>Throughout Project implementation</p>	Project Coordination Unit (PCU) Contractors and subcontractors
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES		Project Coordination Unit (PCU)

	<p>Implement and include in the bidding documents, Terms of Reference and contracts of the Project's suppliers/contractors, the occupational health and safety (OHS) clauses specified in the ESMF, and any other OHS measures recommended by the specific ESIA/ESMP.</p> <p>In the current context of COVID-19, specific clauses shall be annexed in the contracts of the service providers so that no project activity shall cause health risks for the local populations.</p> <p>Ensure that the Project's contractors/suppliers apply these occupational health and safety (OHS) measures.</p>	<p>Before launching the consultation documents for suppliers / service providers (integration of OHS measures). Before the start of the work.</p> <p>Throughout Project implementation</p>	Contractors and subcontractors
ESS3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE AND HAZARDOUS MATERIALS MANAGEMENT</p> <p>Develop and implement the Hazardous Products and Waste Management Plan to avoid or reduce these risks (included in the ESMF)</p> <p>Identify waste management procedures before the start of activities and ensure compliance with the agreements established between these managers and the project contractors</p> <p>Ensure that the Project suppliers/contractors develop and implement a Non-Hazardous and Hazardous Waste Management Plan.</p>	<p>Same timing as the ESMF (before Project assessment)</p> <p>Throughout Project implementation</p> <p>Before the start of the sub-projects</p> <p>Before the start of the works</p>	Project Coordination Unit (PCU)
3.2.	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Ensure that contractors implement resource efficiency and pollution prevention and management measures.</p> <p>Develop and implement a Hazardous Products and Waste Management Plan to avoid or reduce these risks. Implement the resource efficiency and pollution prevention and management measures outlined in the ESIA/ESMP.</p>	<p>Before the start of the works</p> <p>Throughout Project implementation</p>	Project Coordination Unit (PCU)

	Ensure that the worksite ESMPs cover requirements and technical measures and those service providers and contractors comply with pollution management standards and measures.	Before the start of the works	
ESS4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Ensure that the Project contractors develop and implement Traffic and Road Safety Plans, particularly a traffic plan for construction equipment as required in the ESIA/ESMP</p> <p>Ensure that drivers hired by the Project or the Project's contractors comply with driving rules, which must be detailed in Traffic and Road Safety Plans, particularly a traffic plan for construction equipment, a diversion plan that takes into account an alternative route for supply to the site, as required in the Construction Site ESMPs.</p>	<p>Before the start of the works</p> <p>Throughout Project Implementation and construction</p>	Project Coordination Unit (PCU) Contractors and subcontractors
4.2	<p>RISKS TO PUBLIC HEALTH AND SAFETY</p> <p>Ensure that these ESIA/EIA requirements for reducing or mitigating these risks and impacts are met as well as the effects related to the implementation of Project activities on local populations and include these measures in the ESMPs to be developed pursuant to the ESMF, including those associated with the presence of Project workers and labor influx.</p> <p>Ensure that contractors develop and implement OHS Plans and ESMPs that include material measures and actions to manage the risks and impacts to local populations associated with the implementation of Project activities, including those related to the presence of Project workers and labor influx and the security of the work sites project areas</p>	<p>Before the start of the works</p> <p>Throughout Project Implementation and construction</p>	Project Coordination Unit (PCU) Contractors and subcontractors
4.3	<p>RISKS OF GENDER-BASED VIOLENCE, SEXUAL EXPLOITATION, AND ABUSE, AND SEXUAL HARASSMENT DURING PROJECT IMPLEMENTATION</p> <p>Prepare, adopt and Implement the stand-alone response plan for</p>		Project Coordination Unit (PCU) Contractors and subcontractors

	<p>gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH),</p> <p>Have all project staff, including suppliers and contractors, sign the codes of conduct</p>	<p>Same timing as the ESMF for the development of the plan (before Project appraisal)</p> <p>Prior to starting works Implemented throughout project implementation</p>	
	<p>SECURITY STAFF</p> <p>Ensure, where appropriate, that suppliers or service providers who require security services for their staff and assets can do so by:</p> <ul style="list-style-type: none"> ▪ promoting the use of existing security services in the project area; ▪ ensure that a formal agreement, including clauses on compliance with the code of conduct, is signed if security services are required, ▪ train security staff on safety and health measures at the worksite and SEA/SH issues <p>Prepare, adopt and implement, as necessary, a stand-alone security Management Plan in accordance with the requirements of ESS4 in a manner acceptable to the Bank</p>	<p>Before hiring security staff, this plan is then applied throughout the Project implementation</p> <p>Before the start of works and Throughout implementation of the Project.</p> <p>Before the beginning of activities</p>	
ESS5: LAND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT PLANS</p> <p>Prepare Resettlement Action Plans (RAPs), pursuant to the provisions of ESS5 and in accordance with the requirements of the Resettlement Policy Framework (RPF) prepared for the Project and acceptable to the Association, once the investments to be made are known and reviewed</p> <p>RAPs, including the implementation budget and resettlement and livelihood assistance to project-affected people (PAPs), shall be prepared and implemented collaboratively with affected people in a satisfactory manner prior to the start of works.</p> <p>All RAPs must be approved by the Bank and made available at the national level and on the Bank's website.</p>	<p>The final version of each RAP shall be submitted to the Bank for review and acceptance and disclosed at the country level and on the WB website.</p> <p>Before the start of works on the sub-projects.</p>	Project Coordination Unit (PCU)
5.2	GRIEVANCE REDRESS MECHANISM	Same timing as for the preparation of	

	The Grievance Redress Mechanism (GRM) included in the SEP will also receive and address complaints related to land	the SEP It shall be implemented before the start of resettlement activities and shall be updated as necessary during project implementation	Project Coordination Unit (PCU)
ESS6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	RISKS AND EFFECTS ON BIODIVERSITY Implement biodiversity management measures in accordance with the ESMF and ESMP guidelines. Specific E&S studies shall be prepared and submitted to the Association for approval prior to issuing the consultation documents to suppliers/service providers if necessary according to the results of the E&S screening	ESIA/EIAs including ESMPs shall be submitted to the Association for approval before the start of the works procurement process Application of measures throughout the implementation of the sub-project	Project Coordination Unit (PCU) Contractors and subcontractors
ESS7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not Applicable		
ESS8: CULTURAL HERITAGE: APPLICABLE			
8.1	CHANCE FINDS PROCEDURE Establish a procedure in the ESMF in case of unexpected discovery of cultural remains, in accordance with national legislation. Use the ESMF as a guide for adopting and implementing the unexpected findings procedure and in the ESIA/ESMPs prepared for the Project.	Before project appraisal During preparation and before the implementation of sub-projects	Project Coordination Unit (PCU) Contractors and subcontractors
ESS9: FINANCIAL INTERMEDIARIES			
	Not Applicable		

ESS10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN</p> <p>Prepare, adopt and disseminate a Stakeholder Engagement Plan (SEP).</p> <p>Implementing the SEP</p> <p>Update and re-disclose the SEP as required.</p>	<p>SEP to be disclosed prior to project appraisal</p> <p>Throughout Project implementation</p>	Project Coordination Unit (PCU)
10.2	<p>GRIEVANCE REDRESS MECHANISM AT THE PROJECT LEVEL</p> <p>Implement the Grievance Redress Mechanism for the entire Project, as described in the SEP.</p> <p>This mechanism shall be adapted to address GBV/SEA/SH-related complaints in a timely (within 72 hours), confidential, ethical, non-discriminatory, and survivor-centered manner.</p>	<p>Throughout Project implementation</p>	Project Coordination Unit (PCU)
CAPACITY BUILDING (TRAINING)			
	Type of training to be offered	Timing of training sessions	Target groups
RC1	<p>TRAINING ON ENVIRONMENTAL AND SOCIAL STANDARDS APPLICABLE TO THE PROJECT</p> <ul style="list-style-type: none"> • ESS1: Environmental and Social Assessment, • ESS2: Labor and Working conditions, • ESS3: Resource efficiency and pollution prevention and management • ESS4: Community Health and Safety • ESS5: Land Acquisition, Land Use Restrictions, and Involuntary Resettlement • ESS6: Biodiversity conservation and sustainable management of living natural resources • ESS8: Cultural Heritage • ESS10: Stakeholder engagement and information. 	<p>Before the start of the Project or immediately after effectiveness.</p> <p>Throughout Project implementation</p>	<p>Any worker involved in the Project</p> <p>Specialists in Environmental Safeguards</p> <p>Safeguards in Social Safeguarding</p> <p>Operational coordinator of the Project</p> <p>Contractors/Control Missions</p> <p>DEEC/DRECC involved</p>

RC2	TRAINING ON HEALTH AND SAFETY AT WORK Training of Project workers, including contractors, on occupational health and safety, including emergency prevention, preparedness and response.	Before the start of sub-projects works Throughout Project implementation	Any worker involved in the Project Specialists in Environmental Safeguards Safeguards in Social Safeguarding Operational coordinator of the Project Contractors/ Control Missions DEEC/DRECC involved
RC3	LABOR AND WORKING CONDITIONS <ul style="list-style-type: none"> ▪ Conditions of employment under national labor legislation ▪ Codes of conduct for suppliers, service providers, and subcontractors ▪ Rules on child labor and the minimum age for child employment. ▪ Codes of conduct for suppliers/suppliers and subcontractors, ▪ Workers' obligations and rights. 	Before the start of sub-projects works	Any worker involved in the Project Specialists in Environmental Safeguards Safeguards in Social Safeguarding Operational coordinator of the Project Contractors/ Control Missions DEEC/DRECC involved
RC4	GRM/VGB/EAS/HS <ul style="list-style-type: none"> ▪ Procedures for recording and handling complaints, archiving ▪ Procedures for recording, referencing, and monitoring GBV/SEA/SH grievances ▪ Grievance resolution procedure ▪ Documenting and handling grievances ▪ Use of the procedure by the various stakeholders ▪ Raising public awareness ▪ Awareness, prevention, and mitigation of GBV/SEA/SH risks. 	Throughout Project implementation	Any worker involved in the Project Specialists in Environmental Safeguards Safeguards in Social Safeguarding Operational coordinator of the Project Contractors/ Control Missions DEEC/DRECC involved Badiène Gox of the project intervention areas