

**REPUBLIC OF SENEGAL**  
**Ministry of Environment and**  
**Sustainable Development**  
**Ministry of Fisheries and Maritime Economy**

**Natural Resource Management Project**  
**(P175915)**

**[Draft]**

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

**March 23, 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Senegal (the Recipient) will implement the Senegal: Natural Resources Management Project (the Project), with the involvement of the ministry of Environment and Sustainable Development and the Ministry of Fisheries and Maritime Economy, as set out in the Financing Agreement. The International Development Association (Association) has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management, and the environmental and social (E&S) instruments to be prepared or updated, consulted, adopted, disclosed, and implemented in accordance with the ESSs. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of Environment and Sustainable Development and the Ministry of Fisheries and Maritime Economy and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient / Ministry of Environment and Sustainable Development and Ministry of Fisheries and Maritime Economy. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism.</p>	Submit quarterly reports to Association throughout Project implementation, commencing after the Effective Date.	Both PIUs (MEDD and MPEM)
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, risks based on environmental and social assessment, including safety, health, and environmental (SHE) risks, sexual exploitation, abuse, and harassment (SEAH) risks, gender-based violence, and alleged violations of labor requirements and conditions.</p> <p>Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the association within 7 days following the incident or accident.</p>	Both PIUs (MEDD and MPEM)
C	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the ESHS metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	[Indicate timeframe, e.g., Submit the monthly reports to the [World Bank/Bank/Association] [upon request] [as annexes to the reports to be submitted under action A above].	Both PIUs (MEDD and MPEM) Control offices Contractors/providers and sub-contractors
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.1 <b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain the Project Implementation Units (PIUs) at both MEDD and MPEM, with qualified staff and resources to support management of ESHS risks and impacts of the Project, including an environmental specialist, a social development specialist, a gender specialist.</p> <p>Sign a memorandum of understanding between the Directorate of Environment and Classified Establishments (DEEC) and the two (02) PIUs (MEDD &amp; MPEM) to support environmental and social monitoring, through the mobilization of the National Technical Committee for Environmental Assessment and the Regional Directorates of Environment and Classified Establishments (DREECs) of the project areas.</p>	<p>The environment and social development specialists will be recruited no later than two (02) months after Effectiveness and will be retained in the PIUs for the duration of the Project.</p> <p>The memorandum between the Directorate of Environment and Classified Establishments (DECC) and the two (02) UGPs (MEDD &amp; MPEM) will be signed no later than two (02) months after Effectiveness and will be maintained for the duration of the project</p>	Both PIUs (MEDD and MPEM)
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>Conduct environmental and social assessments in order to identify and assess environmental and social risks and impacts and to implement mitigation measures in a manner acceptable to the Association, as stipulated in paragraph 5 of Annex 1 of ESS1, in particular:</p> <ul style="list-style-type: none"> <li>• Environmental and Social Management Framework (ESMF);</li> <li>• Resettlement Policy Framework (RPF);</li> <li>• Stakeholder Engagement Plan (SEP), including a Grievance Redress Mechanism (GRM);</li> <li>• Resettlement Action Plans (RAPs), as needed;</li> <li>• Functional Frameworks (FFs), as needed;</li> <li>• Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs) for sub-projects;</li> <li>• Labor Management Procedure (LMP);</li> <li>• Environmental and Social Commitment Plan (ESCP).</li> </ul>	<p>The draft ESCP will be disclosed before Appraisal and the final version, following Negotiations</p> <p>The ESMF, SEP/MGP, LMP, RPF will be disclosed before Appraisal.</p> <p>Specific ESF instruments (ESIAs/ESMPs, RAPs, FFs) will be prepared further to the environmental and social screening of each subproject, and prior to beginning of works, throughout project life.</p>	Both PIUs (MEDD and MPEM)

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>Screen any proposed subproject in accordance with the ESMF adopted for the Project and, thereafter, prepare, adopt, and implement the specific assessments (ESIAs/ESMPs, RAPs, FFs) for the subproject, in a manner acceptable to the Association. Included in the Project Operations Manual a section on “Environmental and Social Measures” that will cover:</p> <ul style="list-style-type: none"> <li>• the role of the procurement specialist in drafting terms of reference, bidding documents, and contracts, which will include the required E&amp;S clauses;</li> <li>• the role of the Environmental and Social Development, SEA/SH Specialists in drafting the sections on environmental, social, and SEA/SH measures to be included in the TORs, bidding documents, and works contracts;</li> <li>• minimum environmental and social clauses to be included in bidding documents (including codes of conduct, coordination, reporting and monitoring, and complaint management mechanisms); and</li> <li>• environmental and social indicators to be included in the monitoring system.</li> </ul>	<p>Specific environmental and social assessments (ESIAs/ESMPs, RAPs, FFs) for any subproject will be prepared during implementation, based on the outcome of the environmental and social screening, and submitted to the Association for no-objection prior to the beginning of any activities in relation with the subprojects.</p> <p>Monitoring tools for these instruments will be used throughout project life.</p>	
<p>1.3 <b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.</p>	Both PIUs (MEDD and MPEM)
<p>1.4 <b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project related for the sanitary and commercial strengthening of the environment and fisheries sectors are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that</p>	Throughout Project implementation.	Both PIUs (MEDD and MPEM)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	the outputs of such activities comply with the terms of reference and are consistent with the ESSs.		
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare, adopt, disclose, and implement the Labor Management Procedures (LMP) for the Project, in accordance with national provisions and with ESS2, and in line with the principles of non-discrimination and equal opportunity. Such LMP will include, inter alia, clauses for the use of domestic and foreign workers (skilled/unskilled, consultants, subcontractors, civil servants, seconded workers, etc.) in accordance with Labor Code, prohibit the use of children and forced labor, and guarantee the right to form a union. Workers will be required to sign a Code of Conduct that prohibits all forms of SEA-SH. All these clauses will be included in contractors, subcontractors, and suppliers' contracts.</p>	The LMP will be prepared and disclosed prior to Appraisal, and implemented throughout the life of the Project	Both PIUs (MEDD and MPEM)
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p> <p>Ensure that Project suppliers/contractors and subcontractors prepare, as part of their ESMPs, and maintain a Grievance Redress Mechanism (GRM) for any Project labor or employment-related issue, that is sensitive to SEA-SH issues and that is transparent, inclusive, and easily accessible to workers. This GRM will include details on the procedures for referral to specialized services to manage SEA-SH cases.</p>	Before work begins and throughout implementation.	Both PIUs (MEDD and MPEM)  The providers and their subcontractors.
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>Ensure that Project suppliers/contractors develop, adopt, and implement a plan based on the occupational health and safety (OHS) measures identified in the ESMP, safety (including personal protective equipment, and emergency preparedness and response, measures to control COVID-19 and other communicable diseases.</p>	Before work begins and throughout implementation.	Both PIUs (MEDD and MPEM)  The providers and their subcontractors.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Insure that E&S clauses included in the contracts of suppliers/providers and subcontractors, deal with management of workers relationships, occupational health and safety		
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Ensure implementation by suppliers/contractors of the Waste Management Plan in accordance with the sub-project's ESMP.</p> <p>The handling of hazardous materials shall be specifically planned and detailed and shall be included in the specifications and contract of the contractor performing the work.</p> <p>Ensure that all site waste is properly disposed of in accordance with the Senegalese Environmental Code, the Waste Management Plan, and the ESMP.</p>	Before work begins and throughout implementation.	Both PIUs (MEDD and MPEM) The providers and their subcontractors.
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Ensure that:</p> <ul style="list-style-type: none"> <li>- The ESMF and other specific instruments (ESIAs/ESMPs) include measures to reduce all forms of pollution;</li> <li>- The measures of rational use of resources (water and others for example) are included in the ESMPs of the enterprise/provider.</li> </ul> <p>The Recipient will ensure that the suppliers/contractors of the Project also develop and implement these measures.</p>	<p>[indicate timing e.g. Same timeframe as for the adoption and implementation of the ESMPs]</p> <p>During the preparation of the instruments (ESMF, ESIAs/ESMPs).</p> <p>These plans and these measures will be maintained throughout the Project implementation.</p>	Both PIUs (MEDD and MPEM) The providers and their subcontractors.
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Ensure that suppliers/providers implement measures and actions to manage traffic and road safety risks as required in the ESMPs to be developed under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESMPs	Both PIUs (MEDD and MPEM) The providers and their subcontractors.
4.2	<b>COMMUNITY HEALTH AND SAFETY</b>	Same timeframe as for the adoption and implementation of the ESMPs	Both PIUs (MEDD and MPEM) The providers and their subcontractors.

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, presence of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p> <p>Develop and implement measures against the transmission of COVID-19 in accordance with WHO and national requirements and inform communities about these risks and prevention measures.</p>		
<p>4.3 <b>SEA AND SH RISKS</b></p> <p>Each entity involved in the Project will be required to sign and apply the codes of conduct related to GBV-SEA-SH. To this end, the grievance redress mechanism should be shared and disclosed to all stakeholders.</p> <p>Ensure that all project bidding documents, contracts for works or services other than consulting services require suppliers or service providers, subcontractors, or consultants to adopt a code of conduct to be given to all workers for signature.</p> <p>This code of conduct applies to non-consulting contracts or services commissioned or performed under such contracts, and covers gender-based violence, violence against women, violence against children, and SEA, among other issues. Provide training on GBV-HS-ASASEA-SH to staff of suppliers or service providers, subcontractors, or consultants.</p>	<p>Before activities start and throughout Project implementation</p> <p>The codes of conduct will be signed by the workers and the required training will be provided when the workers are hired.</p>	<p>Both PIUs (MEDD and MPEM)</p>
<p>4.4 <b>SECURITY MANAGEMENT</b></p> <p>The use of security personnel is not contemplated for this project. However, if the need is determined by site-specific risk assessments, mitigation measures will be proposed in accordance with the provisions of ESS 4.</p> <p>In this case, the ESCP will be amended and redisclosed to reflect the requirements and responsibilities for the use of security personnel on specific project sites.</p> <p>Where applicable, the Recipient will be required to develop, adopt and implement a security management plan in accordance with the requirements of ESS 4, and acceptable to the Association.</p>	<p>The security risk assessment will be undertaken in the ESMF, as well as the sub-project ESIs/ESMPs.</p> <p>Where necessary, a security management plan will be developed in accordance with ESS4, prior to the hiring of security personnel and throughout project implementation.</p>	<p>Both PIUs (MEDD and MPEM)</p>



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT POLICY FRAMEWORK AND PROCESS FRAMEWORK</b>  Adopt and implement a Resettlement Policy Framework (RPF) and a Process Framework (PF) for the Project, consistent with ESS5.	Adopt the RPF prior to project Appraisal and thereafter implement the RPF throughout Project implementation. PF should be adopted for each restricted area during implementation and before the start of interventions	Both PIUs (MEDD and MPEM)
5.2	<b>RESETTLEMENT PLANS</b>  Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, [as set out in the RPF, and consistent with ESS5.	Adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.	Both PIUs (MEDD and MPEM)
5.4	<b>GRIEVANCE MECHANISM</b>  The Recipient shall publicize and implement the Project's grievance mechanism and make it accessible to affected persons in accordance with the provisions of the RPF, RAPs, and FCs.	Before activities start and throughout project implementation	Both PIUs (MEDD and MPEM)
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b>  Ensure that E&S studies (i.e., ESMF, ESIA) include measures and actions to manage risks and impacts on biodiversity, proportional to the level of risk.  Prepare and implement a Biodiversity Management Plan (BMP), as necessary, consistent with ESS6.	Through the preparation of E&S instruments (i.e., ESMF, ESIA)  Prepare and implement a Biodiversity Management Plan (BMP), as necessary, consistent with ESS6, before the start of activities in the areas concerned, and to be monitored during the implementation of the Project.	Both PIUs (MEDD and MPEM)
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
Not relevant to the Project			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>RISKS AND IMPACTS ON CULTURAL HERITAGE</b>	Before Project activities start and throughout Project implementation	Both PIUs (MEDD and MPEM)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Adopt and implement a cultural heritage management plan (CHMP) if required as part of the sub-projects' ESAs/ESMPs, in accordance with the requirements of ESS8.		
8.2	<p><b>CHANCE FINDS</b></p> <p>Describe and implement the chance finds procedures, as describes in the Project's ESMF.</p> <p>Ensure that the ESAs/ESMPs include an assessment of cultural heritage sites in the subproject implementation area.</p> <p>Provisions relative to such chance finds should be included in all works bidding documents and resulting contracts, even where the probability is very low, in accordance with the requirements of ESS8 and in a manner acceptable to the Association.</p>	Before Project activities start and throughout Project implementation	Both PIUs (MEDD and MPEM)
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
Not relevant to the Project			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>Prepare, consult, adopt, disclose, and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. This shall include measures to consult the E&amp;S instruments for the Project.</p>	Disclose the SEP before appraisal, and thereafter implement the SEP throughout Project implementation. The SEP can be revised and updated as needs arise through Project implementation.	Both PIUs (MEDD and MPEM)
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10 and as described in the SEP.</p>	Prepare the grievance mechanism concomitantly to the SEP and operationalize the mechanism no later than four months following Effectiveness, and thereafter maintain and operate the mechanism throughout Project implementation.	Both PIUs (MEDD and MPEM)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints.		Consultants/firms specialized in SEA/SH issues
<b>CAPACITY SUPPORT</b>			
CS1	<p>Training will be required for staff of both PIUs, stakeholders, communities, Project workers on:</p> <ul style="list-style-type: none"> <li>• stakeholder mapping and engagement</li> <li>• specific aspects of environmental and social assessment</li> <li>• emergency preparedness and response</li> <li>• community health and safety.</li> </ul> <p><u>Note:</u> the exhaustive list of necessary training will be provided in the ESMF and the RPF.</p>	From the first quarter following Effectiveness	Both PIUs (MEDD and MPEM) Consultants World Bank
CS2	<p>Training will be required for staff of both PIUs, stakeholders, communities, Project workers on:</p> <ul style="list-style-type: none"> <li>• specific aspects of environmental and social assessment</li> <li>• community health and safety.</li> </ul> <p><u>Note:</u> the exhaustive list of necessary training will be provided in the ESMF and the RPF.</p>	From the first quarter following Effectiveness	Both PIUs (MEDD and MPEM) Consultants World Bank