



**Environmental and Social Management Framework for  
The Gambia Education Sector Support Project: (GESSP)**



*Waiting for their chance in Moria village*



*School Children in Brikamaba*

**Ministry of Basic and Secondary Education  
The Gambia**

**January 2018**

## Content

Acronyms.....	iv
EXECUTIVE SUMMARY.....	vi
Acknowledgement .....	<b>Error! Bookmark not defined.</b>
CHAPTER 1: INTRODUCTION .....	1
1.1 project Description .....	1
1.2 Project Objectives .....	1
1.3 Recommendations of the Audit report on the Implementation of the Safeguards Policies during the READ Project .....	3
CHAPTER 2 PROJECT SITES AND THE BIOPHYSICAL AND SOCIOECONOMIC ENVIRONMENT OF THE COUNTRY .....	4
2.1 Physical Characteristics.....	5
2.2 Biological Characteristics .....	7
2.3 Socio –Economic Characteristics .....	8
CHAPTER 3: OBJECTIVES OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF).....	12
CHAPTER 4: POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL MANAGEMENT .....	13
4.1 National Policy Framework for Environmental Management.....	14
4.2. Legal frameworks .....	15
4.3 Overview of the World Bank Safeguard Policies .....	21
4.4 Institutional framework for Environmental Management.....	23
4.5. Coordination at the Regional level.....	25
4.6 Challenges in collaboration between NEA and MOBSE .....	25
CHAPTER 5: ENVIRONMENTAL AND SOCIAL IMPACTS OF THE GESSP .....	26
5.1 Positive Environmental Impacts .....	26
5.2. Positive Social Impacts .....	26
5.3 Negative Environmental and Social impacts of the GESSP.....	27
CHAPTER 6: THE ENVIRONMENTAL AND SOCIAL SCREENING PROCESS.....	33
6.1. The Environmental and Social Screening Process.....	33
6.2 Responsibilities for the Implementation of the Screening Process.....	37
CHAPTER 7: ENVIRONMENTAL MANAGEMENT PLAN (EMP).....	37

7.1 Environmental Management Plan for the Implementation of GESSP Infrastructural Activities .....	39
7.2. Institutions responsible for Implementing and Monitoring the Mitigation Measures ...	39
7.3. Capacity Building for the Environmental and Social Management of the Project ....	40
7.4. Monitoring Plan and Monitoring Indicators .....	41
7.5 Budget for the Environmental and Social Management of the GESSP .....	42
ANNEXES .....	44
ANNEX 1: GESSP Environment and Social Screening Checklist (ESSC) .....	44
Annex 2: Environmental Guidelines for Civil Works Contractors.....	54
Annex 3: Summary of the World Bank Safeguards Operational Policies .....	59
Annex4: Draft Terms of Reference for Environmental Assessment .....	63
Annex 5a: Summary of discussions with representatives of Government agencies.....	65
Annex 5b: Summary of Consultations with the potential beneficiary communities 8 <sup>th</sup> -10 <sup>th</sup> January 2018 .....	68
Annex 6a: List of Persons Contacted in Government institutions/agencies .....	71
Annex 6b : List Persons contacted at the Potential Project sites .....	72
Annex 7: Bibliography .....	74
Annex 8: Terms of Reference (TOR) .....	75
Annex 9: The Methodology for the study .....	80
<b>FIGURES</b>	
Figure 1: Map of The Gambia and th Districts.....	4
Figure 2: Topographic map of The Gambia showing Elevations above sea level.....	6
Figure 3: Population size and growth in The Gambia.....	9
<b>TABLES</b>	
Table 1: Summary of Emerging risk patterns in The Gambia.....	11
Table 2: Potential negative environmental and social impacts of the Infrastructure component of GESSP.....	29
Table 3: Implementation of the Environmental and Social Screening process with responsibilities.....	36
Table4: Proposed training topics for the stakeholders.....	39
Table 5: Environmental and Social Management Plan for the GESSP.....	42
Table 6: List of communities visited and summary of their observations.....	69

## List of Acronyms

AIDS	-	Acquired Immune Deficiency Syndrome
BDO	:	Biochemical Oxygen Demand
COD	:	Chemical Oxygen Demand
ESA		Environmental and Social Assessment
ECD	-	Early Childhood Development
ESFP	-	Environment and Social Focal Point
EIA	-	Environmental Impact Assessment
EMP	-	Environmental Management Plan
ESSC	-	Environmental and Social Screening Checklist
ESMF	-	Environmental and Social Management Framework
ESSF	_	Environmental and Social Screening Form
GEAP	-	Gambia Environment Action Plan
GESSP	-	Gambia Education Sector Support Project
GPE	-	Global Partnership for Education
HIV	-	Human Immunodeficiency Virus
ICT	-	Information Communication Technology
IDA	-	International Development Association
LACA	-	Land Acquisition and Compensation Act
LBS	-	Lower Basic School
MoBSE	-	Ministry of Basic and Secondary Education
MOHERST	-	Ministry of Higher Education, Research, Science and Technology
NCAC	-	National Centre for Arts and Culture
NEA	-	National Environment Agency
NEMA	-	National Environment Management Act
NEMAC	-	National Environmental Management Council
NEMP		National Environmental Management Programme
NGO	-	Non Government Agency
OP	-	Operational Policy
PAP	-	Project Affected Persons
PCR	-	Physical Cultural Resources
PCU	-	Projects Coordination Unit (Min. of Basic and Secondary Education)
RAP	-	Resettlement Action Plan
RCM	_	Regional Construction Monitors
READ	-	Results for Education Achievement and Development Project
RPF	-	Resettlement Policy Framework
SSS	-	Senior Secondary School
TAC	-	Technical Advisory Committee

TANGO	-	The Association of Non-Governmental Organisations
TOR	-	Terms of Reference
UBS	-	Upper Basic School
VDC	-	Village Development Committee
VLD	-	Voluntary Land Donation
WB	-	World Bank

## EXECUTIVE SUMMARY

The Government of The Gambia in collaboration with The World Bank is developing a project to support the Gambia Education Sector Support Project (GESSP), which will serve as successor to the Results for Education Achievement and Development Project (READ). This new project will consolidate the achievements made thus far in the sector by placing particular emphasis on educational access, and improvement of quality of teaching and learning.

The objective of the proposed project is to increase access to Early Childhood Development (ECD) and basic education and improve the quality of teaching and learning. The Project comprises three main components: i) Enhancing Access to ECD and Basic Education; ii) Improving Quality of Teaching and Learning; iii) Technical and Institutional Support.

**Component 1:** Enhancing Access to ECD and Basic Education- which will involve the construction of new ECD and Lower Basic School (LBS) classrooms, and continued provision of school transportation in selected communities. It will continue the modernization of daaras (Koranic schools) by introducing an adapted curriculum through a results oriented financing model in targeted regions, supported by a sensitization campaign.

**Component 2:** Improving Quality of Teaching and Learning -which will support the revision of curriculum for ECD, Lower Basic, and Upper Basic schools, with a particular focus on English. This component will also address the improvement of teacher training and professional development.

**Component 3:** Technical and Institutional Support- to support capacity building for evidence based decision making in the sector and provide support for the implementation of the communication strategy.

According to the World Bank project classification the GESSP is a Category B project with respect to potential environmental and social impacts which means the potential negative environmental and social impacts are considered to be generally minimal. To ensure that the potential negative impacts are addressed, an Environmental and Social Management Framework (ESMF) is prepared which provides an environmental and social screening process for all future infrastructural investments of the project.

An ESMF is being prepared because at this stage of project preparation, the scope, scale, locations and number of sub-projects have not been fully defined so it is not possible to determine what the environmental and social impacts are.

The ESMF was prepared taking account of the relevant national environmental policies and regulations, notably the National Environment Management Act 1994, the Environmental Impact Assessment Guidelines (1999) and the Environmental Impact Assessment Procedures (1999) and the World Bank safeguard policy, instruments particularly OP 4.01.

As the GESSP has similar objectives to its predecessor, Results for Education Achievement and Development Project (READ) for which an ESMF was prepared and approved and disclosed in

2013, the present study is an update of this document taking account of the experiences gained in the implementation of the safeguards policies in the previous project.

The screening of the infrastructural investment will be done at the regional level by the Construction Monitors supported by the Regional Environment Programme Officers and with the participation of the affected communities. The Construction Monitors will complete the Environmental and Social Screening Checklist to determine the likely negative environmental and social impacts and the mitigation measures to be put in place. The Regional Environment Programme Officer will advise on the categorisation of the sub-project investment. The results could be:

- (a) No environmental work will be required;
- (b) The implementation of simple mitigation measures will suffice; or
- (c) A separate EIA will be required

The completed forms from the Regional Office will be forwarded to the Environment and Social Focal Point (ESFP) within the Projects Coordinating Unit (PCU) for review and approval. Where an Environmental Impact Assessment (EIA) is required the National Environment Agency (NEA) will be contacted for their consideration and approval. The EIA will be conducted in accordance with the national environmental legislation and the World Bank Safeguard Policy OP4.01.

The environmental and social impacts of the project will result mainly from the construction works and the related services such water and sanitation services and activities such as small scale agricultural production, etc.).

These environmental and social impacts occur prior to, during and after construction of the main educational infrastructure.

The main concerns prior to construction are:

- land acquisition resulting in relocation of persons or loss of land and related assets or access to services;
- Loss of vegetation, soil erosion, interruption of natural waterways or drainage systems or the destruction of natural habitats for various fauna, and destruction of protected sites prior to construction.
- The generation of all manner of solid and liquid wastes, increased dust and noise pollution during construction and notably the use of toxic and other hazardous materials,
- Failure to restore the sites to, at least, their previous condition in respect to vegetation cover, protection by fences from unwanted encroachment and construction debris.
- Potential risks to community health and safety

As regards involuntary land acquisition, this is dealt with in separate framework document, the Resettlement Policy Framework (RPF), which is based on the existing national laws the World

Bank social safeguards policies which seek to avoid the negative social impacts or to redress these impacts where unavoidable.

An Environmental Management Plan (EMP) outlines the specific measures that will prevent, mitigate or compensate for anticipated negative environmental effects of a proposed project. It helps to ensure an efficient environmental management of the Project. The management plan will include the following:

- (a) the relevant project activities,
- (b) the potential negative environmental and social impacts,
- (c) the proposed mitigation measures,
- (d) those who will be responsible for implementing the mitigation measures,
- (e) those who will monitor the implementation of the mitigation measures,
- (f) the frequency of the afore-mentioned measures,
- (g) capacity building needs and
- (h) The cost estimates for these activities.

The EMP will be included in Education Project Implementation Manual, with costs.

Where the screening identifies cases which cannot be addressed by simple mitigation measures but which are not substantial to warrant an EIA, a simple subproject EMP shall be prepared by the CM and reviewed by the ESFP and approved by the Construction Programme Manager. Such plans, indicating the measures to be taken and the resources required shall be included in the works for that particular site.

There is very limited understanding of safeguards policies and instruments among some of the key personnel such as the CMs which will need to be addressed to ensure that they are able to carry out their work satisfactorily. It is therefore very important to organise a training workshop for the staff of the PCU and the implementing partners to improve their capacity in the management of safeguards. It is strongly recommended that such training be one of the first activities of the Project with emphasis on environmental and social safeguards policies of the World Bank as well as national regulations in respect of the EIA procedures.

#### National and Regional Coordination/Supervision

- At the national level the PCU will coordinate and supervise the Regional Directorates and it will be supported in this role by the NEA based on the MoU to be signed between MoBSE and NEA.
- In each region, the Construction Monitors will be responsible for completing the environmental and social screening Form (Annex 1); the environmental and social checklists (Annex 2); and determining the environmental category of the screened activity to be able to identify and mitigate the potential environmental and social impacts

of construction and rehabilitation activities. As recommended, s/he will receive environmental training to be able to carry out this task.

- The Environmental and Social Focal Point in the PCU will review the classification and the proposed mitigation measures where these are considered necessary. S/he will ensure that the implementation of the mitigation measures is adhered to by the private contractors.
- Individual consultants or consultancy firms will be responsible for carrying out the EIA studies;
- The private contractors are responsible for the implementation of the mitigation measures as indicated in the Environmental Guidelines for Contractors (**Annex 2**).

Monitoring will be carried out at the regional and national levels.

- At regional level

The Regional Directors, the construction monitors and their cluster monitors will, in a consistent manner, report to the PCU any deviation on the norms set out in the environmental and social management plan.

- At national level,

NEA will supervise the implementation of these environmental measures and will in this regard conduct biannual nationwide tours to all project sites.

Although the project has not triggered Physical Cultural Resources (PCR) OP 4.11, chance finds may occur. In cases of chance finds the contractor should secure the site and report the finding immediately to the CM who will, in turn, report the matter to the Regional Director, the ESFP and the Project Manager. The Project Manager shall inform the Ministry of Tourism and Culture and the National Council of Arts and Culture about the find who shall (within 72 hours) assess the significance and importance of the find and determine how the findings are to be handled. The decision of the Ministry shall be communicated in writing to the PCU and construction work will resume only after authorization is given by the responsible local authorities and the Ministry of Tourism and Culture concerning the safeguard of the heritage.

An overall budget for the infrastructure components of this project cannot be made as the infrastructures are site-specific and unknown at this time. However, the Table below provides the indicative costing of the main activities with a timeline.

**Table 5: Environmental and Social Management Plan with responsibilities**

Measures	Actions to be taken	Agency Responsible	Costs US\$	Timeline
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Institutional measures And Studies	Identify the ESFP within the PCU. Revise the responsibilities of C/ Monitors to include environmental and social safeguards monitoring and review the MoUs with implementing partners.	PCU		Start of project
	To undertake Environmental Impact, subproject EMPs and Resettlement, Action Plan Studies	Consultants	15,000	During project implementation
<b>Sub-Total 1</b>			15,000	
<b>Training</b> (including local communities)	In-country training in environmental and social management of the projects with follow-up and execution of environmental measures at central and decentralised levels	PCU/NEA Consultants	15,000	Start of project
	Overseas training for the ESFP and Project Manager, and Construction Programme Manager	PCU	7,500	Start of project
EMP implementation		Contractors		Prior to start of civil works
<b>IEC Sensitisation</b> (including media campaigns for local communities)	Sensitization of workers at construction sites and communities	Contractors		During construction
	Communication, sensitization and advocacy on the environmental and social stakes of the project, good environmental practices, appropriate behaviour in the homes and schools, respect of customs and traditions, etc.	Regional Directorate of Education PCU, NEA	10,000	Before ,during and after works
Monitoring & Evaluation	Monitoring of the environmental and social impacts of the project at community, regional and national level	NEA, PCU and Community	75,000	Throughout the project impl.
	External evaluation	Consultant	20,000	Mid-term & end of project
<b>Sub-Total 2</b>			<b>127,500</b>	
<b>GENERAL TOTAL</b>			<b>142,500</b>	



## CHAPTER 1: INTRODUCTION

### 1.1 project Description

The Government of The Gambia in collaboration with The World Bank is developing a project to support the Gambia Education Sector Support Project (GESSP), which will serve as successor to the Results for Education Achievement and Development Project (READ). This new project will consolidate the achievements made thus far in the sector by placing particular emphasis on educational access, and improvement of quality of teaching and learning.

### 1.2 Project Objectives

The proposed project seeks to increase access to Early Childhood Development (ECD) and basic education and improve the quality of teaching and learning. The Project comprises three main components: i) Enhancing Access to ECD and Basic Education; ii) Improving Quality of Teaching and Learning; iii) Technical and Institutional Support.

#### **Component 1: Enhancing Access to ECD and Basic Education**

The aim of this component is to expand inclusive education for all, with an emphasis on geographic and economic disparities, gender, students with disabilities, and other vulnerable groups, through a blend of demand side and supply side interventions. On the supply side, access will be expanded through construction of new classrooms ECD and Lower Basic School (LBS) classrooms, and continued provision of school transportation in selected communities. On the demand side, access will be expanded through a program which modernizes daaras (Koranic schools) by introducing an adapted curriculum through a results oriented financing model in targeted regions, supported by a sensitization campaign.

#### **Component 2: Improving Quality of Teaching and Learning**

Under this component the Project will support a set of interventions that will lead to the implementation of a revised curriculum for ECD, lower basic, and upper basic schools, with a particular focus on English. In addition, it will develop a strategic framework and coherent policy for an improved teacher training and professional development pre-service and in-service teacher training which views teacher education along a continuum.

#### **Component 3: Technical and Institutional Support**

This component will support capacity building for evidence based decision making in the sector and provide support for the implementation of the communication strategy including procuring equipment, materials, publishing, dissemination, logistics, and administration. The Project will also provide support to the implementing agency for capacity building initiatives and project management as well financing the project coordination unit (PCU) salaries and operating costs to coordinate the proposed project, and building Ministry of Basic and Secondary Education (MoBSE) and the Ministry of Higher Education, Research, Science and Technology (MoHERST) staff capacity development.

According to the World Bank project classification the GESSP Project is a Category B project with respect to potential environmental and social impacts. This means that it does not potentially have major adverse environmental impacts on human populations or environmentally important areas – including wetlands, forests, grasslands, and other natural habitats. The likely impacts would be site-specific; few if any of them would be irreversible; and in most cases mitigation measures can be designed to address the situation. The Project triggers the World Bank Safeguard instruments notably 4.01 Environmental Assessment- because the Project includes a school construction component which could generate negative environmental and social impacts.

To ensure that the potential environmental and social risks of the proposed project are adequately addressed during implementation, an Environmental and Social Management Framework (ESMF) is prepared. The ESMF will provide the framework for a social and environmental assessment once the sites have been identified and before any infrastructural development takes place. In addition, a Resettlement Policy Framework (RPF) will be prepared under separate terms of reference, to address involuntary resettlement and other related social safeguards issues which will be implemented in conjunction with this ESMF. AN ESMF and an RPF are being prepared because, at this stage of project preparation, the scope, scale, locations and number of sub-projects have not been fully defined. These instruments will help assess the potential environmental and social impacts of the proposed project and identify ways of preventing, minimizing, mitigating, or compensating for adverse impacts that could arise during project implementation.

The Project component likely to trigger negative environmental and social impacts is Sub-component 1.1: Supply Side Interventions to Increase Access and Equity under which there will be construction of new ECD and LBS classrooms to expand access in select communities. This will comprise the (i) construction of 40 ECD classrooms (20 using the community based approach and 20 using the annexed approach); (ii) construction of 40 LBS and UBS classrooms (half of which are multigrade); (iii) special needs modifications. In addition to the classroom construction it is also expected to construct toilets and water points.

### **1.3 Recommendations of the Audit report on the Implementation of the Safeguards Policies during the READ Project**

The present study is an update of the Safeguards documents prepared for the READ Project. In August 2016 the Government commissioned an audit to assess the READ Project's compliance with the safeguards instruments as defined in the ESMF, RPF and the Project Appraisal Document (PAD).

The main recommendations of the report can be summarized as follows:

#### **i. Capacity Building-**

It is recommended that the newly appointed ESFP and the Quantity surveyor who supervises the RCMs be trained in safeguards similar to the course attended by the previous focal point which was organised by Setym International in Dar-es-Salam, Tanzania from October 21<sup>st</sup> -4<sup>th</sup> November 2013. The RCMs and other implementing partners (e.g. NEA, DWR, LGAs and the contractors etc.) should also be provided in-country training to allow a greater number of participants.

#### **ii. Land donations**

It is recommended that the community compensates voluntary land donors with suitable land where the donor needs it as already practiced in some communities. In addition, and again in line with the current practice in the Ministry, the donor or a member of his family should be considered for employment when job vacancies such as caretaker come up.

#### **iii. Monitoring**

Expand the TOR of the RCMs to include safeguards monitoring and modify the monthly reporting format/ template to include safeguards reporting. For national supervision NEA should be urged to take it up fully. The conclusions reached at the recent bilateral meeting between the NEA and PCU should facilitate an early start of this exercise. These conclusions focused on improving communication between the two agencies and ensuring closer collaboration in future in order to improve the national monitoring programme.

#### **iv. Communication on the management of the project safeguards requirements**

To improve on communication the proper recording and filing of important documents such as the voluntary land donation (VLD) certificates and completed Environmental and Social Screening Checklist (ESSC) is a good beginning. The information available must however be made accessible to other implementing partners such as NEA and DWR, consultants working on infrastructure in the project and the contractors.

#### **v. Water supply**

The contractors should be required to correct all the defective issues such as poor drainage system resulting in stagnant pools/muddy waters around taps; improperly sealed well tops that resulted in seepage of surface water back into the well, which were identified during the audit before the final handing over. It is also strongly recommended that the school sensitises the children and the community on the right way of using the hand pump.

**vi. Staff quarters**

With respect to the orientation of the houses it is recommended that the wind direction during the rainy season be taken into account in future constructions sites for the houses.

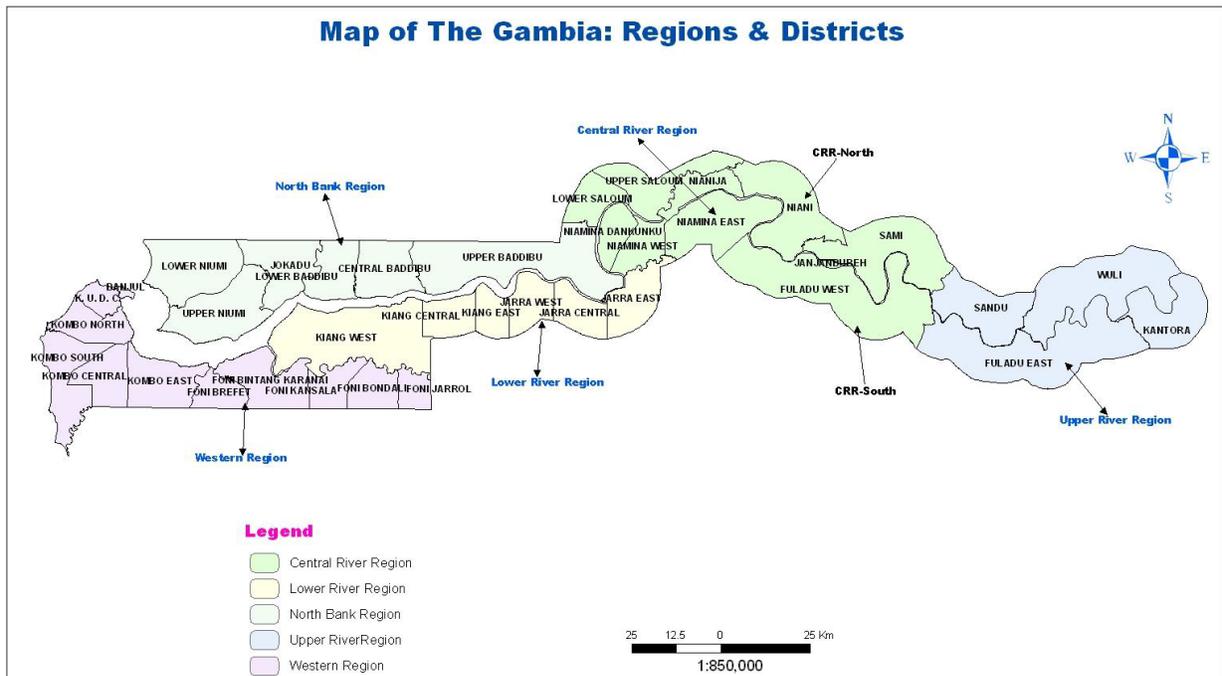
The PCU should ensure that access ramp for the physically disabled are constructed in all the toilets.

The above recommendations have been implemented after the approval of the Audit Report but they are flagged here as important issues that need to be taken into account in preparing the present report.

**CHAPTER 2 PROJECT SITES AND THE BIOPHYSICAL AND SOCIOECONOMIC ENVIRONMENT OF THE COUNTRY**

The geographical spread of the project is country wide covering all the regions except Greater Banjul Area and the West Coast Region. The biophysical environment as well as the socioeconomic characteristics of the country is presented below.

**Figure 1: Map of The Gambia and Districts**



## 2.1 Physical Characteristics

### Geography

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 centre 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.

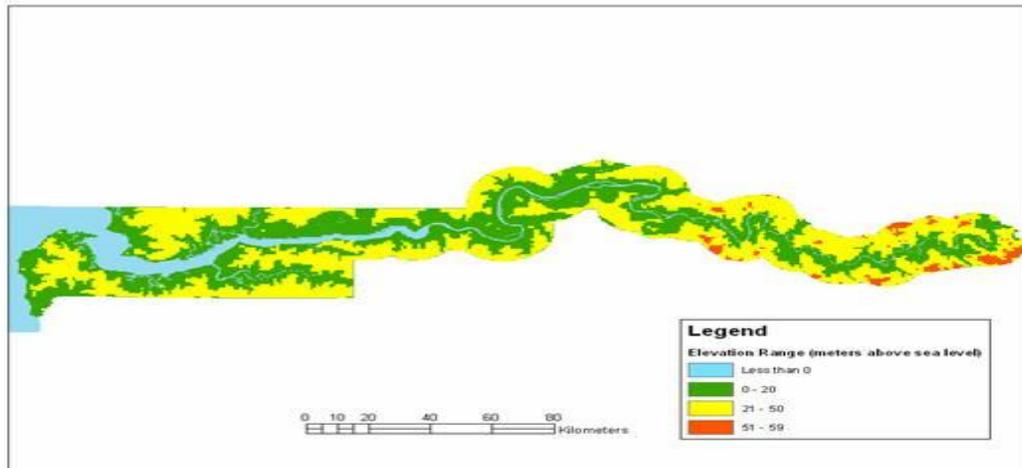
### Topography

The geomorphology of The Gambia is characterised by the River Gambia and its floodplains, river banks and wetlands. The river originates in the Futa Jalon highlands in Guinea, to the south east of The Gambia, from where it flows through south-east Senegal and then westwards into The Gambia, meandering severely and cutting through its ancient sand and sandstone plateau leaving narrow to wide floodplains on either of its banks.

The valley, particularly in the central and western parts of the country, makes up about 39% (or 4,048km<sup>2</sup>) of the total land area of The Gambia. The country is generally low lying with a gently east sloping plateau that is dissected by the river with poorly drained alluvial deposits that are subjected to daily and season flooding. These floodplains (and mangrove swamps in the western half of the country) are home to a rich and diverse flora and fauna including hippos and one of the richest diversity in bird species anywhere in the world, as well for rice cultivation.

The highest points in The Gambia (50 – 60m above sea level) are in the eastern part of the country. These are found in the generally unproductive, low flattop lateritic sandstone plateau that sandwich the river in the east of The Gambia. They occupy less than 4% of the total land area of The Gambia (Figure 1).

**Figure 2: Topographic map of The Gambia showing elevation range above sea level**



Between the valley and the sandstone plateau is the dissected ferruginous plateau with sandy hills. These are gently rolling hills which rise to a maximum height of 20 metres near the coast in Cape St. Mary. The natural vegetation of this dissected plateau, grassland and shrubs in the east and present day remnants of multi-layered tropical forest in the south west of The Gambia, characterise the country's vegetation. Groundnut, millet and sorghum are main crops cultivated in this region.

### **Climate**

The Gambia is characterised 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 (1960-1990) with lesser rains inland (eastwards) and considerable inter-annual differences. In Banjul, heaviest rainfall in recent years was in 1999, when 1084.4 mm was recorded.

The coastal areas of the country experience relatively lower temperatures. Recent (2004 – 2008) average maximum monthly temperatures in The Gambia range from 31°C in Banjul and as high as 41°C in Janjangbureh in May 2008 with mean minimum monthly temperatures as low as 11.3°C in Kerewan in January 2008.

The wind direction is predominantly north to north-easterly between November and April which co-incidentally is the dry season characterised by dry Harmattan winds from the Sahara desert. It is the moist south westerly wind from the Gulf of Guinea from June to September that brings along the rains. The wind direction is west to northerly for most of the rest of the year. Failure to take in account of the wind direction in siting of buildings may expose them to some flooding during the rainy season as the doors and windows become exposed to direct impacts of the rain.

## **Drainage**

The natural drainage in The Gambia is highly dependent on the River Gambia. As the River enters the Gambian territory it flows generally along an east-west axis, emptying west in the Atlantic Ocean. The major tributaries of The Gambia include the Sandougou, Nianija, Sofaniama, Bao and Bintang bolongs. Similar to the main river, a large portion of these catchments also overlie within neighbouring Senegal. Runoff generated from these catchments is however insignificant due to low gradients and permeable soils. Imperfectly drained depressions, inactive streams, and drainage channels further inhibit the runoff process.

## **2.2 Biological Characteristics**

### **Vegetation**

The Gambia's vegetation is dominated by Savannah woodland. The Guinea Savannah, characterized by broad-leaved trees, is dominant in the west of the country. The Guinea Savannah thins into the Sudan Savannah, characterized by shrubs and grasslands, and moving east of the country. Gallery forests and mangroves dominate the coastline vegetation, with the latter extending inland to the saline limit of the estuary.

### **Water resources**

The floodplains, riverbanks and wetlands of the River Gambia are important habitats for wildlife and play an important role in the local economy and livelihood. The flow of the river is highly seasonal with maximum discharge occurring at the end of the rainy season in late September or October with a flow of about 1 500 m<sup>3</sup>/s; the minimum dry season flow is less than 4.5 m<sup>3</sup>/s (measured at Gouloumbo in Senegal).

The country's total actual renewable water resources are estimated at 8 km<sup>3</sup> per year, of which about 3 km<sup>3</sup> are internally produced and the remaining 5 km<sup>3</sup> represent the inflow of the River Gambia from Senegal. It is estimated that internally produced groundwater amounts to about 0.5 km<sup>3</sup> per year, all of which is drained by the River Gambia and becomes the base flow of the river. Groundwater is available in all parts of the Gambia. The country is located in one of Africa's major sedimentary basins and is often referred to as the Mauritania/Senegal Basin. It is characterized by two main aquifer systems with water table depths varying from 10 m to 450 m ([www.fao.org/nr/water/aquastat/countries/gambia](http://www.fao.org/nr/water/aquastat/countries/gambia)).

Along the river, the width of the valley varies from 20 to 40 km and three major sections may be distinguished:

- The Upper Valley (UV), where floods occur occasionally and water is always fresh.
- The Central Valley (CV), where tidal influence exists but water is also fresh. In the lower CV water is fresh only during the rainy season while in the dry season, when the salt tongue moves as far as 250 km upstream, it becomes brackish. Thus, in the dry season, about 220 km of freshwater are left in the Central and Upper River Divisions.
- The Lower Valley (LV), where water is perennially saline because of permanent tidal influence.

### **Water use**

Surface water is rarely used as a source of potable water in the Gambia, because of the continuously saline conditions which exist in the lower reaches of the River Gambia and its tributaries. The main source of drinking water is the shallow aquifer at depths of between 10m to 120m and which is recharged by lateral flow and rainfall; hence the through flow is sensitive to rainfall. In general, the water quality of this aquifer is good, with pH around 5 to 6. However, there are some pockets of iron concentration detected in Burreng, Dongoroba, Pakaliba in the Jarras, Bansang in Fulladu, Kuntaur Fullakunda in Niani, and Kekuta Kunda in Badibu.

With regard to saline intrusion, all the coastal zone aquifers of a distance between 0 – 2km away from the main River banks are considered saline risk zones and this extend up-stream from the coast to Kuntaur 254km inland. (DWR)

### **Land Cover and Land Use**

#### ➤ Forest Cover

The latest figure of the national forest cover is 423,000 hectares or 36% of the land area (Department of Forestry, 2010) which compares with 46% only a decade ago. The Gambia's forest cover consists of mainly savannah woodlands and the mangroves that are found along the Gambia River. There are 66 forest parks covering a total area of 34,029 ha with 25,000 ha under community management. A significant loss of forest cover is said to be due to the loss of mangrove cover estimated to have lost from 67,000 ha in 1981/1982 to 35,700 ha. The mangrove forests are located in the coastal area and inland to the extent of the saline intrusion up the river.

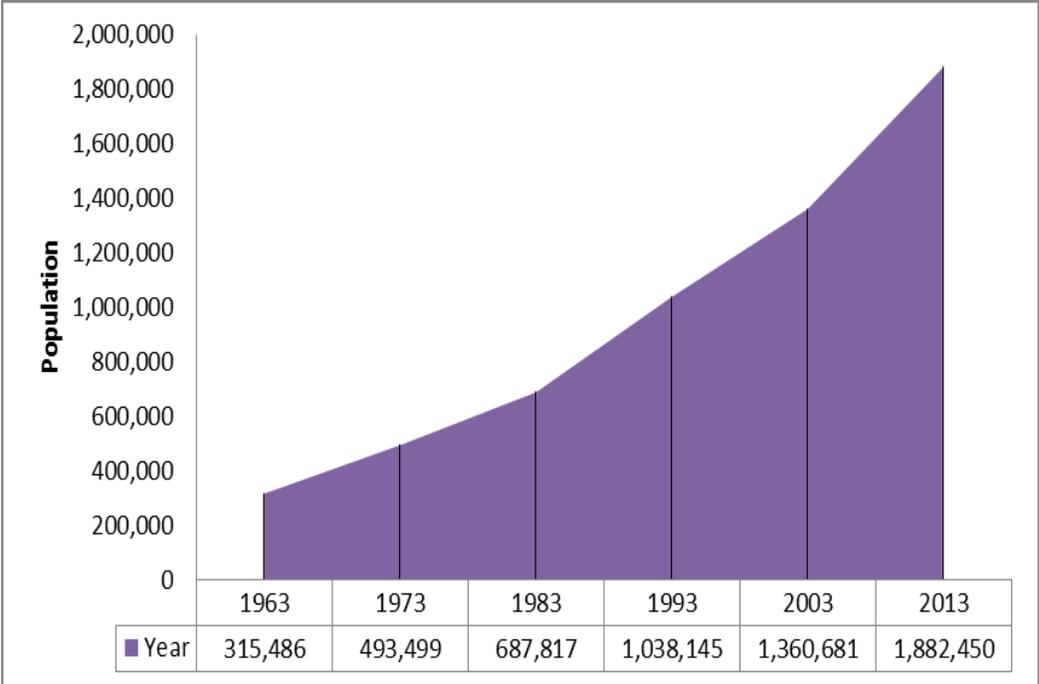
## **2.3 Socio –Economic Characteristics**

### **Demography**

The population of The Gambia is 1,856,417 (2013 Census) which marks an increase of 36.4 per cent during the inter-census period 2003 to 2013 and an annual growth rate of 3.6 per cent per annum. With this rate of population growth, the population of The Gambia is expected to double

in 21 years. The population density of 176 persons/km<sup>2</sup> makes The Gambia one of most densely populated countries in Africa. The urban population is 870,407 or 46.9% and is growing at the rate of 2.5%. About 64.1% of the population is less than 25 years old and about 66.5% of this number is under age 15.

**Figure 3: Population size and growth in The Gambia**



Source: Gambia Bureau of Statistics

The population of The Gambia living in urban areas (Banjul, Kombo St. Mary, Kombo North and Brikama) sky-rocket from a mere 53,000 in 1963 to 643,000 in 2003 and it is projected to 640,000 in 2010 (table 6). As it happens, 45% of population currently live in urban areas. This has resulted in an increase in the conversion of arable and fallow land as well as forests to residents, commercial and recreational/leisure putting remaining forests and wetlands in and near the urban areas under increasing threat. Another consequence of the increased in urbanised land is greater demand for land for the disposal of wastes, and for squatting.

**Economy**

The Gambia’s gross domestic product has been estimated at USD 0.8 billion for 2016 (World Bank). The economy had been generally strong in the past decade, with an average annual real GDP growth rate of about 6% during 2003-2006, and a slight reduction to 5.3% during 2006-2010. In 2011 the country experienced a major drought with serious consequences for

agricultural production which resulted in a negative growth rate of -4.4%. Similar impacts were registered in 2014 as a result of the late start of the rains and the adverse effects of the Ebola epidemic in the sub-region even though the Gambia even though the Gambia was not directly affected by the disease which is estimated to have cut tourism receipts for the 2014/15 season by more than half (IMF 2015). The recent political impasse following the Presidential elections of December 2016 had also negatively impacted on the overall economy with the result that the GDP growth rate was revised to 2% as opposed to the projected 4%. Head on Inflation has also been revised upwards from 5 % to 8% (MoFEA July 2017).

## **Social development**

The Gambia Human Development Index (HDI) has been increasing steadily over the years from 0.441 in 2011 to 0.452 in 2015; but it still remains in the Low Development ranking -175 out of 188 in the United Nations Development Programme's Human Development Report (HDR), 2015. Poverty continues to be a major challenge for the country although poverty assessments have indicated decline in poverty (2008 Poverty Assessment).

With a per capita income of \$500 in 2013, poverty remains widespread in spite of a decline in the last decade; the overall poverty headcount index still stands at 48.5 percent - with a poverty line at \$1.25 a day - in 2010.

### **The National Development Plan 2018- 2022**

To address the socioeconomic challenges highlighted above, The Gambia has recently developed the National Development Plan, (NDP), 2018-2022 as a successor to the Programme for Accelerated Growth and Employment (PAGE) 2012-2016. The primary objective of the NDP is 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. In this process a key thrust of the NDP is the "identification and prioritization of the growth levers of the economy and prospect for diversification based on their contribution to GDP, employment creation and potential impact on poverty reduction." (NDP 2018-2022).

"The focus is to strengthen the country's productive and trade capacities within a green economy, to enable the Private Sector to generate inclusive growth and create jobs especially for the women and the youth, and lead in ushering reforms that are essential for improving the business environment and for enhancing competitiveness. " (NDP 2018-2022)

### **Land Tenure and Property Rights**

Property rights and land tenure provide equal incentives to all groups for improved land management. Land administration in the Gambia is governed by the State Lands Act of 1990 and the Land (Regions) Act 1991. The former designates lands in Banjul, the Kanifing Municipality, Kombo South, Kombo Central and Kombo North as state lands to be administered by the State.

In the provinces where all the project construction works are sited the land is held under customary tenure and administered by the District Authority as provided for in the the Land (Regions) Act, 1991. Customary or traditional tenure is an interest or title which a member of the larger community acquires in the communal land. It is an interest which is held as of right by virtue of being a member of the community.

### Changing/Emerging Hazards

Urbanisation, global climate change and increased in international trade will expose the country to new risks as presented in Table 7 below.

**Table 1: Summary of emerging risk patterns in The Gambia**

	Emerging/Changing Hazards	Risks/Threats
1	Rapid and unplanned urbanisation	<ul style="list-style-type: none"> <li>▪ Increasing areas of ‘urban’ areas annually inundated by the seasonal rains</li> <li>▪ Waste management</li> </ul>
2	Climate change	<ul style="list-style-type: none"> <li>▪ Sea level rise and accelerated coastal erosion</li> <li>▪ Food insecurity</li> <li>▪ Floods or siltation of fertile farmlands</li> </ul>
3	Industrialisation	<ul style="list-style-type: none"> <li>▪ Concentration of hazardous/explosive facilities</li> <li>▪ Regular transportation of oil tankers up country</li> <li>▪</li> </ul>
4	‘New’ pandemics	<ul style="list-style-type: none"> <li>▪ Avian Flu</li> <li>▪ H1N1 virus</li> </ul>
5	International Trade	<ul style="list-style-type: none"> <li>▪ E-waste and other imported goods that subsequently become wastes</li> <li>▪ Illegal importation of hazardous substances</li> </ul>

## CHAPTER 3: OBJECTIVES OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)

### *3.1. The objective of the ESMF*

The objective of this ESMF is to provide an environmental and social screening process for the future infrastructure investments and activities of the proposed education sector support project. The ESMF describes the steps involved in identifying and mitigating the potential environmental and social impacts of future construction activities as well as providing guidance in cases where the screening results indicate that a separate Environmental Impact Assessment (EIA) is required. This ESMF has been prepared in recognition of the fact that 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's OP.4.01 Environmental Assessment which calls for the environmental screening of all Bank-financed projects, and subsequently the assignment of an environmental category, ranging from category A (significant negative impacts); to category B (impacts less significant than those of category A) and which can be mitigated effectively); to category C (no significant environmental impacts, and hence, no additional environmental work required).

In comparison, the assessment form of existing projects at the level of the NEA seem not only very brief and even incomplete in the procedures for project classification but also in the conditions for the execution of related environmental assessments.

To close this gap, an Environmental and Social Screening Form (Annex 1) has been designed to assist in the evaluation of planned construction and rehabilitation activities under the education project. The form is designed to place information in the hands of implementers and reviewers so that impacts and their mitigation measures, if any, can be identified and/or that requirements for further environmental impact assessment be determined.

According to Gambia Environmental law, specific investment activities require EIAs, whereas there are no clear EIA requirements for activities of a smaller scale, but which might have negative localized impacts that would require appropriate mitigation. This is the reason why this project will use the environmental and social screening process outlined in the ESMF. This process will allow the PCU to identify, assess and mitigate potential negative environmental and social impacts at the conception and planning of building and construction stages, and, if necessary, carry out separate EIAs where the screening results indicate the need for such.

The Environmental and Social Screening Form (ESSF) contains information that will allow reviewers to determine the characteristics of the prevailing local bio-physical and social environment with the aim to assess the potential impacts of the rehabilitation activities on this environment. The ESSF will also identify potential socio-economic impacts that will require mitigation measures and/or resettlement and compensation.

The ESMP summarizes institutional arrangements for the implementation of mitigation measures, the monitoring, through certain indicators of the implementation of these measures, capacity building needs as well as cost estimates. The EMP will be included in the Project Implementation Manual (PIM) to ensure it is implemented and monitored. The PIM will explain who will do what and when.

Potential social impacts due to land acquisition such as loss of land and livelihoods or loss of access to economic assets would be addressed in by the Resettlement Policy Framework (RPF). The RPF has been prepared as a separate document and outlines the policies and procedures to be applied in the event of land acquisition/involuntary resettlement.

## **CHAPTER 4: POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL MANAGEMENT**

The policies, legal and institutional frameworks for environmental management in The Gambia are summarised below. The international conventions subscribed to are also presented.

### **4.1. National Policy framework for Environmental Management**

#### **a. Gambia's Environmental Action Plan (GEAP)**

The Gambia's Environmental Action Plan seeks to promote and implement sound environmental policy. The GEAP represents the culmination of a series of initiatives and activities coordinated by the NEA. It is the master plan for the environment in the Gambia and contains a National Environment Policy, Framework Environmental Legislation and Environmental Strategy. The GEAP consists of Sectoral Plans for the medium and long term intended to lead to sustainable development in Gambia. The Plan puts special emphasis on environmental management, pollutions and nuisances, and the necessity to safeguard the well-being of the populations.

The other environmental strategies existing are:

- The National Strategy and action Plan on Biodiversity Conservation,
- The National Climate Change Policy 2017,
- The National Action Plan to combat Desertification.

#### **b. The National Climate Change Policy**

The National Climate Change Policy was formulated in in 2016 and approved in 2017. The Policy provides “.....the framework for managing climate risks, building institutions and

capacities, and identifying new opportunities for climate-resilient sustainable development in The Gambia”. It focuses attention on policy priorities in four key thematic clusters, namely: i) Climate resilient food systems and landscapes: Agriculture, food security, forestry and natural resources, including water, biodiversity and wildlife , ii) Low emissions and resilient economy: Energy, transport, infrastructure, and the key economic sectors of tourism and financial services; iii) Climate resilient people: Health, education, equitable social development, and human settlements; iv) Managing coastlines in a changing environment: climate-aware Integrated Coastal Zone Management. Interventions in each of these clusters have important implication of environmental sustainability. In 2017 the country developed the Strategic Programme for Climate Resilience (SPCR), an overarching strategy to support the implementation of the NCCP. The Programme is “an adaptation and mitigation investment plan, designed to reduce and manage the country’s high vulnerability to climate variability and change.”

### **c. Health Care Waste Management Plan 2005-2010**

The current long-term objective of the Health sector in Vision 2020 is to provide adequate, effective and affordable health care for all Gambians. Against this background the immediate policy objectives are: i)to improve the administration and management of health services; ii) provide better infrastructure for referral hospitals and health facilities; and iii) extend the primary healthcare (PHC) services to all communities.

Whilst health care facilities appear to be singularly lacking in schools, management of health care wastes should not be excluded from this framework document as awareness programmes in this subject can be pursued through the educational institutions.

#### **a) Decentralisation Policy**

The other major policy is decentralisation which seeks to transfer responsibility and resources to the regions in an effort to generate greater participation of the local communities in the development process and to make Government actions more responsive to local needs.

The Ministry of Basic and Secondary Education has been implementing such a policy. The Regional Education Directorates that have been set up provide an important opportunity for greater interaction with the local communities in the implementation of the Government policies in the Education Sector. In the implementation of the GESSP’s infrastructural investments they will be required to play an important in the implementation of the ESMF and the RPF.

At a more general level there is the decentralisation of the local government structures which gives some of the environment management issues at local level to the local government authorities. These structures together with those at village level, the Village and Ward Development Committees will be expected to be involved in the screening process as well as some of the other aspects of the implementation of the EMP such as monitoring with the required capacity.

## 4.2. Legal frameworks

### a. National Environment Management Act 1994

At national level, the National Environmental Management Act, NEMA, 1994, is the main document setting out the overall management of the environment. The NEMA 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 forbids storage or disposal of toxic pollutant products on the ground, underground, on water bodies and in the atmosphere. It also recommends that the Government establishes environmental quality standards in order to ensure the sustainable use of the Nation's resources. This law contains chapters on environmental pollution and environmental quality standards. It focuses on the necessity of realizing environmental impact assessment (EIA) for projects and programs having negative effects on the environment or public health. In this field, the NEA had formulated 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 education infrastructure activities.

### b. Environmental Impact Assessment Regulations 2014

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 GESSP, particularly as regards the classification of activities and the carrying out of the EIAs. The EIA guidelines, also gives an indication of the activities for which EIA is necessary. If it becomes necessary

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 the 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 standardised project brief is submitted by a developer using the « Screening Form ». The Screening Form (Annex 3) 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 proponent. 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 sufficient 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 categorised 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.
- The Agency issues a Certificate of Environmental Approval to any developer whose project has been approved.

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 (storage of semi-hazardous materials, solid waste disposal, etc).

Apart from the EIA content, the procedures require a public survey prior to the issuance of any authorization on the basis of the EIA. The EIA conducted by the consultants at the request of the promoter is submitted for approval to the NEA that oversees the procedure for the conduct of EIAs (approval of the TOR, approval of the studies, authorization given to consultants and consultancy firms, etc.).

### **c. The Public Health Act 1990**

The Public Health Act was enacted to make provision for public and environmental health-connected matters. This Act empowers the Secretary of State to formulate regulations regarding the collection, removal and disposal of sanitary waste and other noxious waste. The Act also mandates the Director of Health Services who also heads the Department of Public Health Services to abate nuisances and to remove or correct any condition that may be injurious to public health. It empowers public health officers to monitor environmental and public health regulations.

### **d. Waste Management Bill 2003**

The Draft Waste Management Bill is the only specific legislation on waste. It has provision for the development of regulations on all solid and liquid wastes.

#### **e. Hazardous Chemicals and Pesticides Control and Management act 1994**

To regulate the use of hazardous chemicals and pesticides, the Hazardous Chemicals and Pesticides Control & Management Act was enacted in Parliament in April 1994 making it compulsory to register all hazardous chemicals and pesticides sold and used in the Gambia. This regulatory framework replaced the 1983 Pesticides Management Act and made the provision for the establishment of Hazardous Chemical and Pesticide Management Board (HCPMB), a regulatory body responsible for the registration, licensing and management of all hazardous chemicals & pesticides.

#### **f. The Environmental Quality Standards Regulations**

The Environmental Quality Standards Regulations established an Environmental Quality Standards Board with the primary responsibility of proposing environmental quality standards to the National Environmental Management Council and to periodically review the standards. The standards set by this law apply to ambient air, saline waters, surface fresh waters and groundwater.

#### **g. The Environmental Discharge (Permitting) Regulations**

The Environmental Discharge (Permitting) Regulations requires the registration of processes with the potential to pollute. The 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.

#### **h. The Hazardous Chemicals Regulations**

The Hazardous Chemicals Regulations (1996) supports Part B of the Hazardous Chemicals and Pesticides Management Act. It provides for the registration of and applicants for the importation and use of hazardous chemicals, their labelling, packaging and safe storage, as well as the sale, handling and licensing of importers and storage facilities.

#### **i. Biodiversity and Wildlife Act (2002)**

The Wildlife and Biodiversity Act of 2003 provides for the Department of Parks and Wildlife Management to declare and manage national parks, reserves and local sanctuaries, as well as Ramsar sites for the purpose of preserving the country's biodiversity. It also allows for the participation of 'local people' in biodiversity management for the purpose of ensuring their sustainable use.

#### **j. Physical Planning and Development Control Act 1991**

The Physical Planning and Development Control Act provide the legal basis for the preparation and approval of any physical development plans and control of all types of land use on state land

in The Gambia. The Act requires “all plans (national, divisional, city, town or local), prior to their approval by the subject Minister, to be exhibited to the public and their views considered”.

#### **k. Local Government Act 2002**

This Act was enacted in 2002 to make provisions for (i) the functions, powers and duties of local authorities, (ii) development in the decentralised governments, (iii) local government civil service, traditional authorities and the co-ordination of local government authorities.

#### **l. Forestry Act (1997)**

The Forestry Act entrusts forest with the Minister responsible for forestry and have provision for the process of reserving or de-reserving forest land. The Act prescribes management techniques and prohibited acts in the forests. The penalties for the infringing on the provisions of the Act are also stated.

#### **m. National Centre of Arts and Culture Act 2003**

The Act seeks to preserve, promote and develop Gambian arts and culture. The Act provides for the establishment of a centre 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 as provided for in the Act.

#### **n. The National Water Management Bill (2001)**

The Department of Water Resources has prepared a new National Water Management Bill as prelude to the enactment of a Water Resources Management Act that will provide for the management and rational utilization of water in The Gambia. Other provisions of the Bill include the creation of a National Water Resources Council that will:

- Formulate the overall water resources policy for The Gambia;
- Ensure the rational and sustainable use of water resources of The Gambia; The Bill further mandates the DWR to licence the abstraction of water;
- Have power to make drought orders, prohibit the disturbance of groundwater;
- Manage and control of water quality;
- Designate water quality protection zones;
- Prepare codes of good agricultural practices;
- Develop of rural water supply;

- Prohibit the discharge of any effluent from a sewage treatment works or any trade effluent into controlled waters.

### 4.3 Overview of the World Bank Safeguard Policies

The World Bank's ten safeguard policies are designed to help ensure that projects proposed for Bank financing are environmentally and socially sustainable, and thus improve decision-making. These operational policies include:

- OP 4.01 Environmental Assessment;
- OP 4.04 Natural Habitats ;
- OP 4.09 Pest Management ;
- OP 4.11 Cultural Heritage;
- OP 4.12 Involuntary Resettlement;
- OP 4.10 Indigenous People;
- OP 4.36 Forests;
- OP 4.37 Safety of Dams;
- OP 7.50 Projects on International Waterways ;
- OP 7.60 Projects in Disputed Areas.

In addition, there is the Bank's Disclosure Policy BP 17.50 which requires that all safeguard documents are disclosed in the respective countries and at the Bank's Info shop prior to appraisal. Of these operational policies, OP 4.01 is the "umbrella" policy as the environmental screening results will determine which of the afore-mentioned safeguard policies are likely to be triggered, in addition to OP 4.01. **Annex 3** summarizes these safeguard policies.

**OP 4.01 Environmental Assessment:** The objective of OP 4.01 is to ensure that projects financed by the Bank are environmentally and socially sustainable, and that the decision making process is improved through an appropriate analysis of the actions including their potential environmental impacts. Environmental assessment (EA) is a process whose breadth, depth, and type of analysis depend on the nature, scale, and potential environmental impact of the proposed project. EA takes into account the natural environment (air, water, and land); human health and safety; social aspects (involuntary resettlement, indigenous peoples, and cultural property); and trans-boundary and global environmental aspects.

EA considers natural and social aspects in an integrated way. OP 4.01 is triggered if a project is likely to present some risks and potential adverse environmental impacts in its area of influence. Thus, in the case of the education projects, potential negative environmental and social impacts due to construction activities and likely to include loss of vegetation, soil erosion, soil and groundwater pollution, air pollution, public health impacts such as traffic hazards, noise, dust,

and loss of livelihoods. The ESMF has been designed to address potential impacts at the planning stage of new construction programmes.

**OP 4.12 Involuntary Resettlement:** The objective of this operational policy is to

- (i) avoid or minimize involuntary resettlement where feasible and explore all viable alternative project designs and location,
- ii) assist displaced persons in improving their former living standards, income earning capacity, and production levels, or at least in restoring them;
- (iii) encourage community participation in planning and implementing resettlement, and
- (iv) provide assistance to affected people regardless of the legality of land tenure (encroachers and squatters included).

The policy does not only cover physical relocation, but:

- (i) relocation causing loss of land and or loss of shelter;
- (ii) loss of assets or access to assets; and
- (iii) loss of income sources or means of livelihood, whether or not the affected people must move to another location.

This policy also applies to the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons. In the event of land acquisition, the education project will implement the provisions of the Resettlement Policy Framework (RPF) which has been prepared as a separate document.

### **Occupational and Community Health and Safety**

There is no specific policy on Occupational and community health and Safety, but requirements and provisions are built into OP4.01. The Environmental Health and Safety Guidelines of the World bank Group are applicable to all projects with physical works. The guidelines require all projects to anticipate and avoid adverse impacts on the health and safety of project- affected communities during the project life cycle from both routine and non-routine circumstances; avoid or minimize community exposure to project related traffic and road safety risks; and to ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to project-affected communities. Worker safety requirements are an obligation of the project and are to be built into contractor bid documents.

The screening process will identify the potential risks and negative impacts and shall propose the measures required to address them.

## **Chance Finds of Historical and Archaeological Sites**

Although the project has not triggered Physical Cultural Resources (PCR) OP 4.11, chance finds may occur. In such cases the contractor should secure the site and report the finding immediately to the CM who will, in turn, report the matter to the Regional Director, the ESFP and the Project Manager. The Project Manager shall inform the Ministry of Tourism and Culture, the National Council of Arts and Culture and the local authorities about the find. The Ministry of Tourism and Culture shall (within 72 hours) assess the significance and importance of the find and determine how the findings are to be handled. The decision of the Ministry about how to safeguard the find shall be communicated in writing to the PCU and construction work will resume only after authorization is given by the responsible local authorities and the Ministry of Tourism and Culture concerning the safeguard of the heritage. A detail procedure for the contractors has been included in the Environmental Guidelines for Civil Works Contractors.

### **4.4 Institutional framework for Environmental Management**

Although several public institutions have responsibility in managing the environment in The Gambia the National Environment Agency is the lead agency responsible for environment policy formulation and coordination of all environment related activities. Established in 1994 through the National Environment Management Act (NEMA) 1994, the NEA has the responsibility to implement the GEAP and oversee the EIA. The Act provides for the establishment of the National Environmental Management Council (NEMC) which oversees environmental policies, environmental standards, guidelines and regulations proposed by the NEA and the Technical Advisory Committee (TAC).

There are several levels (central, division and district/municipal) of decision-making involved in environmental protection, land allocation and resource management. Central (national) institutions comprise ministries with their respective national directorates based in Banjul. These agencies have the competence to formulate policies and strategies and to enforce and control their implementation. NEMA established the main institutions involved in EIA process: the National Environmental Management Council (NEMAC), the National Environment Agency (NEA) and the Technical Advisory Committee (TAC).

#### **a. National Environmental Management Council (NEMAC)**

The National Environmental Management Council (NEMAC), the Governing Council of the NEA was officially inaugurated in 1993 and established under the National Environmental Management Act. The NEMAC is chaired by the President of The Republic, and 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 proposed by the NEA, and sets the terms and conditions of service of the staff.

**b. National Environment Agency (NEA)**

The National Environment Agency was established by an Act of Parliament in 1993. Broadly the Agency is the principal body responsible for the management of the environment and co-ordinates all activities of the Government in this field. In doing so, it is responsible for liaison with all Government and external agencies, NGOs, interest groups and the general public. The responsibilities of the NEA are: to revise and develop policies and sustainable environment inter-sectoral development plans, promote sectoral legislation; co-ordinate policy implementation; promote public awareness. The Agency has elaborated National Environmental Action Programmes and specific strategies on Biodiversity Conservation, Climate Change and Desertification. The NEA is also responsible for regulating Environmental Impact Assessment (EIA) procedures in the Gambia.

As indicated above, all projects likely to have significant environmental impacts are obliged by the Environmental Act to carry out an EIA prior to authorisation. 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.

In the environmental management of this education 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.

**c. Technical Advisory Committee (TAC)**

As an advisory body to the NEA, the TAC consists of fifteen members whose expertise reflects the various fields of environment management. The TAC advises the NEA on any issues which may be referred to it, and in particular, it reviews the achievements of the NEA, reviews and advises on any environmental impact assessment of major projects, and reviews environmental plans, environmental standards, guidelines and regulations relating to NEMA. The executive Director of the NEA is the Chairperson of the TAC.

**d. National Level Coordinating Structures**

The national structures consist of eight Working Groups as follows:

- Agriculture and Natural Resources,
- Environmental Information Systems ,

- Chemicals and Pesticides Management Board ,
- Environmental Education and Communication ,
- Coastal and Marine Environment ,
- Environmental Impact Assessment ,
- Environmental Legislation , and
- Environmental Quality ,

The Working Groups are composed of representatives from Government Institutions, Non-Government Organisations, and the Private Sector which meet to discuss aspects and issues of the environment. Membership is determined by the mandate of the institution concerned. The increase in numbers assumes the working groups are viable, functional and effective in coordinating and implementing the Gambia Environmental Action Plan (GEAP).

#### **4.5. Coordination at the Regional level**

##### **a. Regional Directorates of Education**

The MoBSE has created Regional Education Directorates to foster the de-centralisation policy of the Government. They have been provided with resources and functional facilities in terms of infrastructure and logistics to support their work load. Decentralization will not affect environmental management; however the municipalities and Local Communities will be involved in the screening process and implementation of operational activities. These communities will also participate in the supervision of the works that will take place in their area, particularly in urban areas; they can even help in the regulation of the works (regulating diversions).

##### **b. Regional Offices of NEA**

At the regional level the NEA has Programme Officers and Inspectors whose role is to monitor the implementation of Environmental regulations and standards in the regions. This category of officers will be required to provide an important support to the regional Directorates of the MoBSE.

#### **4.6 Challenges in collaboration between NEA and MOBSE**

Although the institutional responsibilities and the environmental legislation requirements are clearly defined in the interactions between the NEA and MOBSE, the overall collaboration and partnership that should exist between the two institutions to facilitate selection, screening and supervision have not materialized in the past. The signing of an MOU has not improved

supervision of the education project as highlighted in the Audit report on the READ project. There is need to improve on this performance.

## **CHAPTER 5: ENVIRONMENTAL AND SOCIAL IMPACTS OF THE GESSP**

The infrastructural works of the GESSP Project will generate environmental and social impacts which could be either positive or negative. Below are some of the impacts likely to arise as a result of the Project.

### **5.1 Positive Environmental Impacts**

Positive environmental impacts would include:

- Construction and rehabilitation of water and sanitation facilities would create improved disposal of human waste and improved hygiene which could reduce the transmission of water related diseases such as diarrhoea. This development would positively impact on the student community and populations of the satellite communities,
- The provision of school wells will help support gardening which could be improve the school feeding diet and also help generate interest in agriculture.
- Some of the communities lack potable water supply, the water supply points in the schools would make water available for the local community which can greatly improve the quality of life;
- Schools and homes are places that can be used for environmental education and awareness programmes. Consequently, they can play a very important indirect role in the protection and conservation of fauna and flora.

### **5.2. Positive Social Impacts**

Overall, the GESSP Project is likely to have a positive impact on the socio-economic development of The Gambia, particularly in the communities where these schools will be located. Some of the positive impacts include:

- The Project will make education available to a category of people who are very much disadvantaged either because of gender, physical disability or distance away from the

nearest school. It would promote some equity in terms of access to educate and will greatly increase the number of pupils into the school system;

- The works, (including sanitation and water points) will contribute towards recreating a healthy school environment for pupils and teachers. This will encourage also many more parents to send their children to school as the schools would be nearer to the home and considered more secured;
- For the water supply infrastructure the construction of water supply facilities (bore holes, watering points, wells, etc.) will contribute to improving the availability of water not only to the schools but also to the surrounding villages particularly in places affected by water shortage. This will reduce both the time and energy spent by women to fetch water. Thus, these achievements will contribute to improving the health situation of the children and the local populations by making available to them clean water.
- For the agricultural activities that may develop because of the wells these could bring about improvement of nutrition standards of the children by making use of the garden produce in the school feeding programme.
- The construction programme will create employment opportunities for locals and increase the cash injection in the local economy.

### 5.3 Negative Environmental and Social impacts of the GESSP

A summary of the major negative environmental and social impacts of the construction component is provided in **Table 2** below. These negative impacts can arise before, during and after construction. The environmental and social screening process proposed in the ESMF will ensure that the potential negative impacts are identified and appropriate mitigation measures instituted as recommended in the Table... below.

It is recommended that Environmental Guidelines for Civil Works Contractors (Annex 2) are used to ensure that the constructor's activities are carried out in compliance with the mitigation measures proposed in the ESMF. These guidelines are to be included in the contractual agreements and form the basis for monitoring compliance

With respect to community health and safety it is not expected that the Project will cause any major negative impacts because of the size of the civil works. Generally, the expected number of workers on construction sites is on average 15 which includes 10 from outside the community and the rest are usually recruited from the beneficiary community. The period of stay is between 6-12 months. The contractor will ensure that the workers safety procedures are implemented as prescribed in the ESMF, by detailing them in their site-specific contractual documents. However,

some adverse impacts such as community exposure to project-related traffic and road safety risks, direct impacts on ecosystem services such as forests may occur which have been addressed in Table 3. Other mitigating measures have also been included in the Guidelines for Civil Works Contractors. In the latter case, it is recommended that contractors sensitise their workers on the social norms and safety regulations required whilst working in the communities.

**Table 2: Potential Negative Impacts and Mitigation Measures for the infrastructural component of the GESSP**

<b>Phase</b>		<b>Potential impacts</b>	<b>Mitigation measures</b>
Pre-construction	Environmental	cutting of trees within construction site access, &	Replanting of the number of tree cut within the school or another public institution. This should be determined in consultation with appropriate lands and forest authorities. In case the trees are part of community lands and individual properties, replacement should be done in consultation with the community and/or individual owners.
	Social	Community hostility and lack of support for project	Undertake adequate sensitisation from start and promote their active participation
Construction	Environmental	degradation of storage sites of construction materials and equipment,	Regular collection and evacuation of work site construction waste in authorized dumps
		air pollution due to vehicle rotation, noise, dust etc	Put in place safety measures to reduce vehicle rotation and water the main road arteries used by vehicles in the community and school to reduce dust
		Pollution and noise nuisances; degradation of the living environment	Put in place a system to reduce noise and sensitise the operators of these engines; Works should be done during working hours to minimize disruption and nuisance to communities
		Air pollution during the burning of some work site wastes	Discourage burning by ensuring that all waste are collected and transported to the designated dump site
		Impacts on protected areas and habitats for rare species or of ecologic or domestic importance.	contractor must obtain building materials from registered quarries
		Potential pollution of the quality of surface and groundwater	Install work sites far from waterways

			Regular collection of work sites refuse must be sent to authorized dump. Ensure adequate spacing between latrines and water supply points
	Social	Conflicting demands on surface or groundwater supplies	Contractor must be informed about appropriate water supply sources for promote improve design of schools for water harvesting
		Involuntary displacement of populations or economic activities	Design an action plan for resettlement as per RPF
		Risks of accidents during at work sites and in the community	Conduct an awareness raising campaign for the work sites staff and the school children, teachers, and the local community Reduce speed limits for vehicles travelling through the community Access roads, movement and timings of trucks movement to construction site should be informed to the communities Safety signages must be installed where appropriate
		Non- use of local manpower	Hire in priority local man power
		Health and safety of workers	Worker protection including protective equipment must be provided by contractor Food safety and water and Sanitation measures must be provided for workers Worker refuse must be managed through proper sensitization of workers and regular pick-up for disposal
		Health and safety of community	Contractor and Project must set up systems to reduce fraternization between incoming workers and the local community

			<p>A functioning Grievance redressal mechanism must be in place before civil works starts</p> <p>The local community must be informed about the impending civil works before they start</p>
		Disruption or destruction of sites of cultural, historic or religious importance	Avoid installing the facilities in a way that will impact historic, cultural or traditional use; in case there are archaeological or culturally sensitive properties (graves; religious sites etc) found or in the vicinity, these should be managed according to the chance find procedures
		Chance finds of cultural & historic artefacts	Apply the required procedures as defined in the present document which is in line with the NCAC Act 2003.
		Disturbance of school and education activities during works	<p>Select work periods (avoiding as much as possible periods of classes)</p> <p>Install safety barriers and signages appropriately</p>
		Disturbance of the circulation of goods and persons by the engines, the storage of materials in the community	Design traffic deviation plans approved by the concerned administrative authorities; Make careful selection of installation sites; Conduct an awareness raising campaign before the start of the works
Post Construction	Environment	Inadequate cleaning and maintenance service, creating unhygienic conditions, and as a result students avoid using latrines	Employ caretakers to regularly clean the toilets and promote personal hygiene education in the school and in the community.
		Students defecating in open areas/bush	<p>Design, promote and conduct public hygiene awareness campaigns focusing on adverse health impacts of open defecation and promote latrine use.</p> <p>Similar sensitisation should also be carried out in the communities to promote attitudinal change</p>
		Development of water related diseases (malaria, bilharzias, etc.)	Improve the hygiene around water supply points and promote personal hygiene education in schools

			During construction, attention must be paid to water logging or dumping which can attract vectors
		Contamination of water source / supply	Protect water sources from contamination from runoff from nearby agricultural areas (e.g. silt, oils chemicals); ensure that well covers are properly sealed to prevent seepage of surface water back into the well
		Presence of iron in the water supply	Conduct tests to verify the level concentration is within safe limits i.e. 0.3 milligrams per liter (mg/l),
	Social	<ul style="list-style-type: none"> <li>- Negative social and economic impacts on existing community water management practices and relationships</li> <li>-Conflicting demands on surface or groundwater supplies</li> </ul>	<ul style="list-style-type: none"> <li>Minimize water use</li> <li>Modify design to allow water harvesting</li> </ul>
	Human Health	Illness or disease due to poor water quality	<ul style="list-style-type: none"> <li>Ensure water source is fit for drinking, through regular water quality testing and treatment if necessary</li> <li>Assess present and future source / supply contamination risks and minimize them</li> </ul>

## **CHAPTER 6: THE ENVIRONMENTAL AND SOCIAL SCREENING PROCESS**

### **6.1. The Environmental and Social Screening Process**

The sections below illustrate the stages (steps 1-7) of the environmental and social screening process for this Project leading to the review and approval of the education project activities to be implemented. The purpose of this screening process is to determine which activities are likely to have negative environmental and social impacts; to determine appropriate mitigation measures for activities with adverse impacts; to incorporate mitigation measures into the project as appropriate; to review and approve the project's proposals; and to monitor environmental parameters during the implementation of activities.

The extent of environmental work that might be required prior to the commencement of the projects will depend on the outcome of the screening process described below. The process of screening can be broken down into the following steps:

#### **Step 1: Screening of the Education Project's Infrastructure and Locations.**

The initial screening in the field will be carried out by the Construction Monitors (CM) of the Project Construction Unit located in each Region in consultation with and the support of the Regional Environmental Programme Officers. The CM will do the screenings, under the guidelines of the NEA and complete the Environmental and Social Screening Form (Annex 1) and identify the potential environmental and social impacts, determine their significance, and recommend the appropriate environmental category, propose appropriate environmental mitigation measures, or recommend the execution of an Environmental Impact Assessment (EIA), if necessary. The form will be submitted to the ESFP in the PCU to review and approve in consultation with NEA.

To ensure that the screening form is completed correctly in the various project locations, environmental and social training will be provided to the EFPs in each region.

#### **Step 2: Assigning the appropriate Environmental Categories**

The assignment of the appropriate environmental category to a particular construction/rehabilitation activity will be based on the information provided in the

environmental and social screening form (Annex 1). The ESFP will be responsible for approving the categorizing of the infrastructural activities either as A, B, or C.

- Category A: activities requiring an environmental impact assessment,
- Category B: activities requiring an environmental impact statement or the implementation of simple mitigation measures,
- Category C: activities neither requiring an environmental impact statement nor an environmental impact assessment.

The assignment of the appropriate environmental category will be based on the provisions in OP 4.01 Environmental Assessment. Consistent with this operational policy, most activities under the education project are likely to be categorized as B or C, meaning that their potential adverse environmental impacts on human populations or environmentally important sensitive areas – including wetlands, forests, grasslands, and other natural habitats – are site-specific and few, if any, of the impacts are irreversible, and can be mitigated readily.

### **Step 3: Carrying out Environmental Work**

After analyzing the data contained in the environmental and social screening form and after having identified the right environmental category and thus the scope of the environmental work required, the ESFP will make a recommendation to establish whether: (a) no environmental work will be required; (b) the implementation of simple mitigation measures will be enough; or (c) a separate environmental impact assessment EIA will be carried out. In the latter the proposed EIA will have to approved by the NEA,

According to the results of the screening process, the following environmental work can be carried out:

(a) Application of simple mitigation measures. Activities categorized as simple category B activities might benefit from the application of simple mitigation measures outlined in the Environmental and Social Screening Checklist (ESSC). In situations where the screening process identifies the need for land acquisition, qualified service providers would prepare a RAP, consistent with OP 4.12.

(b) Carrying out Environmental impact assessment (EIA): In some cases, the results of the environmental and social screening process may indicate that the activities scheduled are more complex and they consequently require conducting a separate EIA. The EIA will be conducted by consultants authorized/agreed by the PCU and the NEA.

The EIA will identify and assess the potential environmental impacts for the planned construction/rehabilitation activities, assess the alternatives solutions and design the mitigation, management and monitoring measures to be proposed. These measures will be quoted in the Environmental and Social Management Plan (ESMP) that will be prepared as part of the EIA for

each activity. The preparation of the EIA and the ESMP will be done in collaboration with the concerned parties, including the people likely to be affected. The EIA will be carried in accordance with the national Environment regulations and in consonance with the provisions of OP 4.01.

The draft EIA terms of reference have been provided in Annex 6 of the ESMF which can be adapted as necessary.

#### **Step 4: Review and Approval**

Review: At the regional level, the Director together the CM, the Regional Programme Officer (NEA) in the Region shall review the environmental and social screening forms as well as the EIA reports, and will make recommendations as to whether the results of the screening process or the EIA reports are acceptable. This structure at the regional level will review:

- (i) the results and recommendations presented in the environmental and social screening forms,
- (ii) the propose mitigation measures presented in the environmental and social checklists and,
- (iii) as appropriate, the results of EIAs to ensure that all environmental and social impacts have been identified and effective mitigation measures have been proposed and incorporated into the project implementation and costs.

The findings of the regional level will be conveyed to the ESFP in the PCU.

Recommendation for Approval/Rejection: Based on the results of the above review process, the ESFP will make recommendations to the NEA for approval/rejection of the review results and the proposed mitigation measures.

Approval/Disapproval: The EIA reports will have to be reviewed in the light of the ESFP recommendations prior to approve/rejection by the NEA. If the EIA is approved, the NEA issues the necessary environmental permit that confirms the EIA has been satisfactorily completed and the project may proceed. A decision is made and a record of the decision explains how environmental issues were taken into consideration.

#### **Stage 5: Public Consultations and Disclosure:**

Public consultations will also take place during the screening process, and the results will be communicated to the public by the ESFP. According to the procedures governing the EIA, public consultation and participation must be carried out with the beneficiary communities during the

scoping and the preparation of the Environmental Impact Assessment. Public information includes particularly:

- Meetings to be organized with local authorities, the concerned communities and their organizations for the presentation of the project;
- A record of the discussions with the communities must be prepared and such records should include a summary of the points raised in respect of their concerns, appreciations, and suggestions on the project. It should also indicate how the project proposes to address the concerns of all parties in the EIA. The results of the consultations will be included in the EIA report.

For the education project infrastructure activities, the public consultation process will be carried out throughout the project life particularly: (i) during the screening and classification of project activities and (ii) during EIA studies. In cases where a particular subproject requires an EMP this will be prepared as outlined below.

### **Stage 6: Environmental Monitoring and Follow-up**

Environmental monitoring aims at checking the effectiveness and relevance of the implementation of the proposed mitigation measures. In coordination with the Project Coordination Unit, monitoring will be done at communal, regional and national level.

#### **➤ Regional level**

At the regional level the Construction Monitors will monitor the construction activities on a monthly basis. The reports of these monthly visits, with photographic evidence, shall be submitted to the ESFP within the PCU Office in Banjul. The ESFP shall carry out at least quarterly visits to project sites to ensure that the recommended mitigation measures are implemented. Such quarterly visits shall be conducted with the Regional Programme Officer of NEA in the region.

#### **➤ National Level**

There will be nationwide biannual supervision visit by NEA to all the regions where the project is being implemented.

With specific reference to the water points the Department of Water Resources (DWR)/ a private agency shall ensure that the contractual safeguards clauses are implemented by the contractors.

The monitoring to be carried out by NEA and DWR will be the subject of a memorandum of understanding (MOU) between the MoBSE. Already one already exists which will need to be

reviewed and updated. The option of a private firm for monitoring the water points is retained then a service contract will have to be prepared between the PCU and the firm concerned.

### **Stage 7: Monitoring indicators**

In order to assess the efficiency of the education project’s construction/ rehabilitation activities, it is we proposed that the following below monitoring indicators be used:

Environmental and social indicators

- Water quality in schools and surrounding communities meet international standards,
- Safe waste management related to construction works
- Reforestation and land restoration after construction and or rehabilitation,
- Compliance with the Environmental Guidelines for Contractors
- Best practice in the implementation of project activities,
- Equipment for safe medical waste management provided by projects where required.

These monitoring indicators will be included in the education Project Monitoring Manual.

### **6.2 Responsibilities for the Implementation of the Screening Process**

The CMs will oversee the implementation of the ESMF in the regions and they will be supported by the Regional Directorates and the Programme officers of NEA. At the central level the ESFP will coordinate their activities with the NEA. To ensure that the screening process is carried out effectively, the project will provide support for environmental training, as required.

The table shown below gives a summary of the stages and institutional responsibilities for the screening, preparation, assessment, approval and implementation of the education construction/rehabilitation activities.

**Table3: Implementation of the environmental and social screening process with responsibilities**

<b>Stages</b>	<b>Responsibilities</b>
1. Screening of infrastructural activities at the sites using the Environmental and Social Screening Form (Annex 1)	Construction Monitors with the support of the Regional Environment Officers
2. Assigning the appropriate Environmental Categories (A, B, or C)	Construction Monitors with support of the Regional Environment Officers
3. Review of screening results and Approval minor mitigation measures	ESFP in PCU in consultation with NEA
4.1 Approval of (i) the screening results ; (ii)	NEA

the assigned environmental category; and (iii) recommendations of the ESFP for EIA	
3.2 Selection of the consultants in cases where EIA is required.	The Project Coordination Unit shall approve the designation of consultants in consultation with NEA.
3.3 Execution of the environmental Impact Assessment (EIA)	Authorized Consultants
3.4 Approval of environmental assessment	NEA
4. Public consultations and disclosure	Regional Directorates, ESFP in PCU and NEA.
Inclusion of the ESMF/EIA mitigation requirements, including Annex 3 into contractor bid documents	Project Coordination Unit and ESFP
5. Monitoring	Community, CM , ESFP, Regional Environment Officers and NEA.
6. Environmental and Social Indicators	The CM in each region will ensure that the environmental and social monitoring indicators listed in the ESMF are included and adhered to in all project construction/rehabilitation activities of the project.

### **EMP for sub-project components**

Once the screening is completed and the negative environment and social impacts can be adequately addressed in the Guidelines for Civil works contractors then the CM shall include it in his monitoring programme, However, if the negative impacts are more serious requiring a simple management plan then the CM, in consultation with the Regional Environmental Programme Officer, will develop a subproject environmental management plan which will indicate the actions to be undertaken and the resources required. The plan will be submitted to the Regional Director for review and submission to the ESFP for further review before submission to the Construction Programme Manager for approval or otherwise. Once approved, it shall be included in the contract for the execution of works on that particular site and form part of the activities to be monitored by the CM.

## **CHAPTER 7: ENVIRONMENTAL MANAGEMNT PLAN (EMP)**

## **7.1 Environmental Management Plan for the Implementation of GESSP Infrastructural Activities**

At the time of the implementation of some of the activities of the infrastructure component, the potential environmental and social impacts must be clearly identified and a management plan formulated and implemented. The plan's performance must be monitored before, during and after construction or rehabilitation of the works. The impacts must be avoided or neutralised where possible or mitigated in conformity with Gambia's and World Bank prescriptions.

An Environmental Management Plan (EMP) for the GESSP is intended to ensure efficient environmental management of these construction activities. The EMP will include:

- a) the potential negative environmental and social impacts;
- b) the proposed mitigating measures;
- c) those who will be responsible for implementing the mitigation measures;
- d) those who will monitor the implementation of the mitigation measures;
- e) the frequency of the afore-mentioned measures;
- f) capacity building needs; and
- g) the cost estimates for these activities.

The ESMF and the EMP will be included in in the project documents including the Project Implementation Manual (PIM) with the associated costs.

## **7.2. Institutions responsible for Implementing and Monitoring the Mitigation Measures**

Roles and responsibilities regarding environmental planning and approval for construction or rehabilitation activities are outlined and summarised below. The main institutions with key roles and responsibilities for environmental and social management are:

### **National Coordination/Supervision**

- At the central level, the PCU and the NEA will coordinate and supervise the CMs and the Regional Environment Officers in the regions.
- At the regional levels, these CMs will carry out the initial screening process as per the forms contained in annex 1 in order to present to the NEA and PCU the appropriate observations and recommendations as to the environmental and social soundness of the project activities under consideration.

### **Execution/Implementation**

- Individual consultants or consultancy firms will be responsible for carrying out the EIA studies;

- Private contractors will be responsible for the implementation of the mitigation measures as indicated in the Environmental Guidelines for Contractors (Annex 3).

#### Monitoring

- This exercise will be carried out by the NEA and the PCU at the national level and CMs in collaboration with Regional Environmental Officers at regional level.

### 7.3. Capacity Building for the Environmental and Social Management of the Project

There is very limited understanding of safeguards policies and instruments among some of the key personnel such as the CMs which will need to be addressed to ensure that they are able to carry out their work satisfactorily. It will therefore be very important and helpful, to organise a training workshop for the staff of the PCU and other implementing partners in order to improve their capacity in the management of safeguards. It is strongly recommended that such training be one of the first activities of the Project with emphasis on environmental and social safeguards as well as EIA procedures. **Table 4** below gives a list of topics for the training with recommendations for institutions that can be invited to send participants.

The PCU Manager and Environmental and Social Focal Point within the PCU should attend environment related training seminars while in-country training can be organised for construction monitors, contractors and other partners at the national and decentralised levels.

The following training topics are proposed for training of the different categories of stakeholders:

**Table 4: Proposed training topics for the different categories of stakeholders**

Concerned stakeholders	Training Topics
CMs and other PCU staff, NEA, Dept. of Lands & Surveys, Dept. of Physical Planning, Min. of Finance, Governors and Local government authorities in the regions of intervention, representatives of beneficiary communities	Training in the field of: <ul style="list-style-type: none"> <li>- Environmental Impact Assessment (screening and classification of sub-projects; EIA procedures, etc.)</li> <li>- Impacts identification.</li> <li>- Draft terms of reference for environmental assessments.</li> <li>- Selection of simplified mitigation measures in the checklists</li> <li>- Pollution, waste management, hygiene and quality standards</li> <li>- Gambia's national environmental policies, procedures, and legislation</li> <li>- World Bank Safeguards Policies</li> <li>- Monitoring the implementation of measures and environmental indicators.</li> <li>- Occupational and worker health and safety</li> </ul>

and other implementing partners ect.	- Community health and safety
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## 7.4. Monitoring Plan and Monitoring Indicators

Environmental monitoring aims at checking the effectiveness and relevance of the implementation of the proposed mitigation measures and if necessary they can be modified, interrupted or replaced if found to be inadequate. Furthermore the monitoring enables the assessment of compliance with national regulations and Bank procedures on environmental assessment. The monitoring and evaluation concern the pre-construction, construction and post construction phases and it allows, if necessary to reorient the works and eventually improve the course of implementation of the project.

### 7.4.1 Monitoring at community, regional and national level

#### Community level

As part of promoting greater community involvement in the project and also to promote a sense of ownership, the community should be involved in the monitoring of the ESMF. For this purpose they need to be sensitised on simple environmental and social awareness issues such security of work site, conduct environmental sensitization etc. which will provide a much closer monitoring. To be effective however will require having direct telephone access to the Regional Director, CM and ESFP to report on cases of non- compliance.

#### Regional level

At the regional level the Project will undertake internal monitoring of the construction activities on a monthly basis. The reports of these monthly visits shall be submitted to the ESFPs with the PCU Office in Banjul. The ESFP shall carry out at least quarterly visit to project sites to ensure that the safeguards recommended mitigation measures are implemented. The NEA through the Regional Programme Officers will provide support for the quarterly monitoring

#### National Level

There will be nationwide supervision biannually by NEA that will visit all the regions where the project is being implemented.

With specific reference to the water points the Department of Water Resources (DWR) shall ensure that the contractual safeguards clauses are implemented by the contractors.

The monitoring to be carried out by NEA and DWR will be the subject of a memorandum of understanding (MOU) between the MoBSE and the institutions concerned i.e. NEA and DWR. Such MOU will give details of the specific implementation modalities including the activities to be undertaken by the agencies.

#### 7.4.2: Monitoring indicators:

In order to assess the efficiency of the education project's construction/ rehabilitation activities, as well as subsequent maintenance the following environmental and social indicators are proposed:

##### Environmental and social indicators

- Level of application of the environmental and social mitigation measures
- the types measures put in place to protect the environment throughout the construction phase
- The level compliance with the security and safety requirements for the workers
- System of management of waste and used water generated at the work site
- Number of trees or live fence planted
- Efficiency of the collection, transportation and elimination of waste at the work site
- The number of training programmes organised
- The number of sensitization sessions organized
- The number of locally created employment
- The number of actors trained in evaluation, review and environmental management
- Number of people affected and compensated by the project
- Effectiveness of the implementation resettlement plan and the level of its application
- Quality and functionality of the structure constructed
- Level of hygiene and cleanliness/healthiness of the sites

These indicators will be regularly monitored during the implementation of the activities. These monitoring indicators will be included in the PCU Project Monitoring Manual.

##### Independent Audit

There will be an independent audit in midterm and end of project implementation.

Include an independent audit in mid-year and end of project implementation

## **7.5 Budget for the Environmental and Social Management of the GESSP**

An overall budget for the infrastructure components of this project cannot be made as the infrastructures are site-specific and unknown at this time. However, Table 9 below provides the costing and timeline for some of the activities planned in the EMP.

**Table 5: Environmental and Social Management Plan with responsibilities for the GESSP**

<b>Measures</b>	<b>Actions to be taken</b>	<b>Agency Responsible</b>	<b>Costs US\$</b>	<b>Timeline</b>
Institutional measures And Studies	Identify the ESFP within the PCU. Revise the responsibilities of C/ Monitors to include environmental and social safeguards monitoring review of MoU with implementing partners	PCU		Start of project
	To undertake Environmental Impact Assessment, Implementation of subproject EMPs and Resettlement Action Plan	Consultants	15,000	
Sub-Total 1			15,000	
<b>Training</b> (including local communities)	In-country training on environmental and social management of the projects with follow-up and execution of environmental measures at central and decentralised levels	PCU/NEA Consultants	15,000	Start of project
	Training for the ESFP and Project Manager and Construction Programme Managers and Construction Monitors	PCU	7,500	Start of project
Implementation of EMP measures		Contractors		Prior to start of civil works
<b>IEC Sensitisation</b> (including media campaigns for local communities)	Sensitization of workers at construction sites and communities on OHS	Contractors		During construction
	Communication, sensitization and advocacy on the environmental and social stakes of the project, good environmental practices, appropriate behaviour in the homes and schools, respect of customs and traditions, etc.	Regional Directorate of Education PCU, NEA	10,000	Before, during and after works
<b>Monitoring &amp; Evaluation</b>	Monitoring of the environmental and social impacts of the project at community, regional and national level	NEA, PCU and Community	75,000	Throughout the project life
	External evaluation	Consultant	20,000	Mid-term & end of project

<b>Sub-Total 2</b>	<b>127,500</b>	
<b>GENERAL TOTAL</b>	<b>142,500</b>	

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**ANNEXES**

**ANNEX 1: GESSP Environment and Social Screening Checklist (ESSC)**

Please type or print clearly, completing this form in its entirety. You may provide additional information on a separate sheet of paper if necessary. Kindly note that Section 22 of the National Environmental Management Act of 1994 requires that the information you are to provide is accurate and it is an offence to give inaccurate information under Section 53 (C) of the same Act.

Use this form/pre-construction checklist for:

- (i) determining the viability of proposed sites for construction of classrooms, toilets, staff quarters and water points
- (ii) assessing the environmental and social impacts of the proposed sub-projects and assigning the appropriate environmental and social categories; and
- (iii) proposing appropriate mitigation measures

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School name/Region:

Proposed Location (include map/sketch): (e.g. Region, district, etc.)

Planned type of activity : (e.g. new construction, rehabilitation, periodic maintenance)

Proposed Date of Works Commencement:

Technical Drawing and Specifications (circle Yes No  
Reviewed : answer):

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**1. Site Selection:**

Physical data:	Yes/No answers and bullet lists preferred except where descriptive detail is essential.
Site area in ha	
Any existing property to transfer to project	
Any plans for new construction	

Refer to project application for this information.

2. Environmental and Social Impact Identification and Classification:

When considering the location of a GESSP investment project, rate the sensitivity of the proposed site in the following table according to the given criteria. Higher ratings do not necessarily mean that a site is unsuitable. They do indicate a real risk of causing undesirable adverse environmental and social effects, and that more substantial environmental and/or social planning may be required to adequately avoid, mitigate or manage potential effects. The following table should be used as a reference.

**IMPACT IDENTIFICATION AND CLASSIFICATION**

Issues	Site Sensitivity		
	Low (C)	Medium (B)	High (A)
Natural habitats	<input type="checkbox"/> No natural habitats present of any kind	<input type="checkbox"/> No critical natural habitats; other natural habitats occur	<input type="checkbox"/> Critical natural habitats present
Water quality and water resource availability and use	<input type="checkbox"/> Water flows exceed any existing demand; low intensity of water use; potential water use conflicts expected to be low; no potential water quality issues	<input type="checkbox"/> Medium intensity of water use; multiple water users; water quality issues are important	<input type="checkbox"/> Intensive water use; multiple water users; potential for conflicts is high; water quality issues are important
Natural hazards vulnerability, floods, soil stability/ erosion	<input type="checkbox"/> Flat terrain; no potential stability/erosion problems; no known volcanic/seismic/flood risks	<input type="checkbox"/> Medium slopes; some erosion potential; medium risks from volcanic/ seismic/ flood/ hurricanes	<input type="checkbox"/> Mountainous terrain; steep slopes; unstable soils; high erosion potential; volcanic, seismic or flood risks
Cultural property	<input type="checkbox"/> No known or suspected cultural heritage sites	<input type="checkbox"/> Suspected cultural heritage sites; known heritage sites in broader area of influence	<input type="checkbox"/> Known heritage sites in project area
Involuntary resettlement	<input type="checkbox"/> Low population density; dispersed population; legal	<input type="checkbox"/> Medium population density; mixed ownership	<input type="checkbox"/> High population density; major towns and villages;

	tenure is well-defined; well-defined water rights	and land tenure; well-defined water rights	low-income families and/or illegal ownership of land; communal properties; unclear water rights
Indigenous peoples	<input type="checkbox"/> No indigenous population	<input type="checkbox"/> Dispersed and mixed indigenous populations; highly acculturated indigenous populations	<input type="checkbox"/> Indigenous territories, reserves and/or lands; vulnerable indigenous populations

### 3. Assessment of the landscape

Issues	Potential for Adverse Impacts				
	None (C)	Low (C)	Med (B)	High (H)	Remarks
Soil erosion or flooding concerns (e.g., due to highly erodible soils or steep gradients)					
Any new access (roads) construction?					
Disturbances of streams, footpaths, rural roads?					
Wet season excavation?					
Quarry sites or borrow pits?					
Significant vegetation removal?					
Wildlife habitats or populations disturbed?					
Environmentally sensitive areas disturbed?					
Cultural or religious sites disturbed?					

Economic or physical resettlement required? Yes/No					
New settlement pressures created? Yes/No					
Other (specify):					

Water supply	Potential for Adverse Impacts				
	None (C)	Low (C)	Med (B)	High (A)	Remarks
Existing water sources supply/yield depletion					
Existing water users disrupted					
Downstream water users disrupted					
Sensitive ecosystems downstream disrupted					
Salination of soil/Ground water (if unknown check with Department of Water Resources)					
Potential for water contamination/leaching					
Increased social tensions/conflict over water allocation					
Local incapacity/inexperience to manage facilities					
Other (specify):					

4. Detailed questions:

<b>1. Preliminary Environmental Information:</b>	<i>Yes/No</i>	<i>Remarks</i>
State the source of information available at this stage. Is there an EIA or other environmental study?		
Has there been litigation or complaints of any environmental nature directed against the proponent or GESSP investment project?		

Refer to application and/or relevant environmental authority for this information

<b>2. Identify type of activities and likely environmental impacts:</b>	<i>Remarks</i>
What are the likely environmental impacts, opportunities, risks and liabilities associated with the project?	

Refer to ESMF– Impact, Mitigation and Monitoring Guidelines

<b>3. Determine environmental screening category:</b>	<i>Category A, B, or C</i>
After compiling the above, determine which category the GESSP investment project falls under based on the environmental categories: A, B or C.	

Refer to ESMF – Screening and Review Process

<b>4. Mitigation of Potential Pollution:</b>	<i>Yes/No/NA</i>	<i>Remarks</i>
Does the GESSP investment project have the potential to pollute the environment, or contravene any environmental laws and regulations?		
Will the GESSP project require pesticide use?		
If so, then the proposal must detail the methodology and equipment incorporated in the design to constrain pollution within the laws and regulations and to address pesticide use, storage and handling.		
Does the design adequately detail mitigating measures?		

Refer to ESMF– Impact, Mitigation and Monitoring Guidelines

<b>5. Environmental Assessment Report or environmental studies required:</b>	<i>Yes/No/NA</i>	<i>Remarks</i>
If Screening identifies environmental issues that require an EIA or a study, does the proposal include the EIA or study?	<i>A</i>	
Indicate the scope and time frame of any outstanding		

environmental study.		
Required Environmental Monitoring Plan:		
If the screening identifies environmental issues that require long term or intermittent monitoring (effluent, gaseous discharges, water quality, soil quality, air quality, noise etc), does the proposal detail adequate monitoring requirements?		

<b>6. Public participation/information requirements:</b>	Yes/No/N A	Remarks
Does the proposal require, under national or local laws, the public to be informed, consulted or involved?		
Has consultation been completed?		
Indicate the time frame of any outstanding consultation process.		

*Refer to relevant legislative acts in The Gambia.*

<b>7. Land and resettlement:</b>	Yes/No/N A	Remarks
What is the likelihood of land purchase for the READ project?		
How will the proponent go about land purchase?		
Will people's livelihoods be affected in any way, therefore requiring some form of compensation?		
Will people need to be displaced, and therefore require compensation and resettlement assistance?		
Are the relevant authorities aware of the need for a Resettlement Process, involving a census, valuation, consultation, compensation, evaluation and monitoring?		
What level or type of compensation is planned?		
Who will monitor actual payments?		

Refer to the Resettlement Policy Framework.

## 5. Categorization

\*Place tick in applicable box

	Category A	Activities requiring an Environmental Impact Assessment (EIA)
	Category B	Project will not require an EIA, but will necessitate the inclusion of environmental and social mitigation and enhancement measures

		in the design and implementation of the project through the use of standard construction contract clauses and an environmental management plan
	Category C	Project is not subject to environmental assessment as no potential impacts are anticipated.
	Requires a RAP is to be submitted on date	_____
	Requires an ARAP to be submitted on date	_____
	Requires an census and land inventory to be submitted on date	_____
	Does not require further environmental or social studies	_____

**6. Viability of the proposed site for construction of:**

The proposed site is viable for the construction of Classrooms/Teachers quarters/Toilets:

- Yes
- No

The proposed site is viable for the construction of water point

- Yes
- No

**7. Testimony**

I confirm that the information provided herein is accurate to the best of my knowledge. I will also endeavor to provide additional information and facilitate a site visit if required.

-----  
Signed: Developer

Date:

For Official Use Only			
Reviewed by :		Date :	
Classified	A	B	C
Reason for Classification:			

Endorsed by:

Date :

Approved by MoBSE:

Date :

## **Annex 2: Environmental Guidelines for Civil Works Contractors**

The contractors are required to use environmentally acceptable technical standards and procedures during the implementation of construction of works. All construction contracts will contain the following requirements:

- Take precautions against negative influence on environment, any environmental damage or loss through prevention or suppression measures (where it is possible) instead of liquidation or mitigation of negative consequences.
- Observe all national and local laws and rules on environmental protection. Identify officers responsible for the implementation of activities on environmental protection conforming to instructions and directions received from the construction and design or environmental protection agencies.
- Store and dispose of construction waste consistent with national regulations and the sub-project (site-specific) EMP
- Minimize dust emission to avoid or minimize negative consequences influencing air quality.
- Provide pedestrian crossing and roads and access to the public places.
- Provide markets with light and transient roundabout connections to assure safety and convenience.
- Prevent or minimize vibration and noise from vehicles during explosive activities.
- Minimize damages and assure vegetation recovery.
- Protect surface and underground water from soil pollution. Assure water collection and distribution.

### **Safeguards Procedures for Inclusion in the Technical Specifications of Contracts (for rehabilitation/repairs activities)**

#### **I. General**

1. The Contractor and his employees shall adhere to the mitigation measures set down and take all other measures required by the Engineer to prevent harm, and to minimize the impact of his operations on the environment.
2. Remedial actions which cannot be effectively carried out during construction should be carried out on completion of each subproject and before issuance of the “Taking over certificate”:
  - (i) these subproject locations should be landscaped and any necessary remedial works should be undertaken without delay, including grassing and reforestation;
  - (ii) water courses should be cleared of debris and drains and culverts checked for clear flow paths; and
  - (iii) borrow pits should be dressed as fish ponds, or drained and made safe, as agreed with the land owner.

3. The Contractor shall limit construction works to between 6 am and 7 pm if it is to be carried out in or near residential areas.
4. The Contractor shall avoid the use of heavy or noisy equipment in specified areas at night, or in sensitive areas such as near a hospital.
5. To prevent dust pollution during dry periods, the Contractor shall carry out regular watering of earth and gravel haul roads and shall cover material haulage trucks with tarpaulins to prevent spillage.
6. To avoid disease caused by inadequate provision of water and sanitation services, environmentally appropriate site selection led by application of the environmental and social screening form provided in this ESSAF, design and construction guidance, and a procedure for ensuring that this guidance is followed before construction is approved. Ensure engineering designs include adequate sanitary latrines and access to safe water.
7. To prevent unsustainable use of timber and wood-firing of bricks, the contractor should replace timber beams with concrete where structurally possible. In addition, the contractor should ensure fired bricks are not wood-fired. Where technically and economically feasible, substitute fired bricks with alternatives, such as sun-dried mud bricks, compressed earth bricks, or rammed earth construction.
8. The Contractor shall conduct appropriate disposal of waste materials and the protection of the workforce in the event of asbestos removal or that of other toxic materials.

### **Prohibitions**

9. The following activities are prohibited on or near the project site:
  - Cutting of trees for any reason outside the approved construction area;
  - Hunting, fishing, wildlife capture, or plant collection;
  - Use of unapproved toxic materials, including lead-based paints, asbestos, etc.
  - Disturbance to anything with architectural or historical value;
  - Building of fires;
  - Use of firearms (except authorized security guards);

### **II. Transport**

10. The Contractor shall use selected routes to the project site, as agreed with the Engineer, and appropriately sized vehicles suitable to the class of road, and shall restrict loads to prevent damage to roads and bridges used for transportation purposes. The Contractor shall be held responsible for any damage caused to the roads and bridges due to the transportation of excessive loads, and shall be required to repair such damage to the approval of the Engineer.
11. The Contractor shall not use any vehicles, either on or off road with grossly excessive, exhaust or noise emissions. In any built up areas, noise mufflers shall be installed and maintained in good condition on all motorized equipment under the control of the Contractor.

12. Adequate traffic control measures shall be maintained by the Contractor throughout the duration of the Contract and such measures shall be subject to prior approval of the Engineer.

### **III. Workforce**

13. The Contractor should whenever possible locally recruit the majority of the workforce and shall provide appropriate training as necessary.
14. The Contractor shall install and maintain a temporary septic tank system for any residential labor camp and without causing pollution of nearby watercourses.
15. The Contractor shall establish a method and system for storing and disposing of all solid wastes generated by the labor camp and/or base camp.
16. The Contractor shall not allow the use of fuel wood for cooking or heating in any labor camp or base camp and provide alternate facilities using other fuels.
17. The Contractor shall ensure that site offices, depots, asphalt plants and workshops are located in appropriate areas as approved by the Engineer and not within 500 meters of existing residential settlements and not within 1,000 meters for asphalt plants.
18. The Contractor shall ensure that site offices, depots and particularly storage areas for diesel fuel and bitumen and asphalt plants are not located within 500 meters of watercourses, and are operated so that no pollutants enter watercourses, either overland or through groundwater seepage, especially during periods of rain. This will require lubricants to be recycled and a ditch to be constructed around the area with an approved settling pond/oil trap at the outlet.
19. The Contractor shall not use fuel wood as a means of heating during the processing or preparation of any materials forming part of the Works.
20. The Contractor shall conduct safety training for construction workers prior to beginning work. Material Safety Data Sheets should be posted for each chemical present on the worksite.
21. The Contractor shall provide personal protective equipment (PPE) and clothing (goggles, gloves, respirators, dust masks, hard hats, steel-toed and –shanked boots, etc.) for construction and pesticide handling work. Use of PPE should be enforced.

### **IV. Quarries and Borrow Pits**

22. Operation of a new borrow area, on land, in a river, or in an existing area, shall be subject to prior approval of the Dept. Geology, and the operation shall cease if so instructed by the Dept. Geology. Borrow pits shall be prohibited where they might interfere with the natural or designed drainage patterns. River locations shall be prohibited if they might undermine or damage the river banks, or carry too much fine material downstream.
23. The Contractor shall ensure that all borrow pits used are left in a trim and tidy condition with stable side slopes, and are drained ensuring that no stagnant water bodies are created which could breed mosquitoes.

24. Rock or gravel taken from a river shall be far enough removed to limit the depth of material removed to one-tenth of the width of the river at any one location, and not to disrupt the river flow, or damage or undermine the river banks.
25. The location of crushing plants shall be subject to the approval of the Engineer, and not be close to environmentally sensitive areas or to existing residential settlements, and shall be operated with approved fitted dust control devices.

## **V. Earthworks**

26. Earthworks shall be properly controlled, especially during the rainy season.
27. The Contractor shall maintain stable cut and fill slopes at all times and cause the least possible disturbance to areas outside the prescribed limits of the work.
28. The Contractor shall complete cut and fill operations to final cross-sections at any one location as soon as possible and preferably in one continuous operation to avoid partially completed earthworks, especially during the rainy season.
29. In order to protect any cut or fill slopes from erosion, in accordance with the drawings, cut off drains and toe-drains shall be provided at the top and bottom of slopes and be planted with grass or other plant cover. Cut off drains should be provided above high cuts to minimize water runoff and slope erosion.
30. Any excavated cut or unsuitable material shall be disposed of in designated tipping areas as agreed to by the Engineer.
31. Tips should not be located where they can cause future slides, interfere with agricultural land or any other properties, or cause soil from the dump to be washed into any watercourse. Drains may need to be dug within and around the tips, as directed by the Engineer.

## **VI. Historical and Archeological Sites**

32. If the Contractor discovers archeological sites, historical sites, remains and objects, including graveyards and/or individual graves during excavation or construction, the Contractor shall:
  - (i) Stop the construction activities in the area of the chance find.
  - (ii) Delineate the discovered site or area.
  - (iii) Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities take over.
  - (iv) Notify the Construction Monitor who in turn will notify the ESFP and the Project Manager. The Project Manager will inform the National Centre for Arts and Culture (NCAC) and the Ministry of Tourism and Culture immediately (less than 24 hours).
  - (v) Contact the responsible local authorities and the Ministry of Tourism and Culture or its designated agent (NCAC) who would be in charge of protecting and preserving the site before deciding on the proper procedures to be carried out. This would require a preliminary evaluation of the findings to be performed by the archeologists of the

relevant Ministry of Tourism and Culture (within 72 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage, including the aesthetic, historic, scientific or research, social and economic values.

- (vi) Ensure that decisions on how to handle the finding be taken by the responsible authorities and the Ministry of Tourism and Culture. This could include changes in the layout (such as when the finding is an irremovable remain of cultural or archeological importance) conservation, preservation, restoration and salvage.
- (vii) Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the Ministry of Tourism and Culture; and
- (viii) Construction work will resume only after authorization is given by the responsible local authorities and the Ministry of Tourism and Culture the safeguard of the heritage.

## **VII. Disposal of Construction and Vehicle Waste**

- 33. Debris generated due to the dismantling of the existing structures shall be suitably reused, to the extent feasible, in the proposed construction (e.g. as fill materials for embankments). The disposal of remaining debris shall be carried out only at sites identified and approved by the project engineer. The contractor should ensure that these sites: (i) are not located within designated forest areas; (ii) do not impact natural drainage courses; and (iii) do not impact endangered/rare flora. Under no circumstances shall the contractor dispose of any material in environmentally sensitive areas.
- 34. In the event any debris or silt from the sites is deposited on adjacent land, the Contractor shall immediately remove such, debris or silt and restore the affected area to its original state to the satisfaction of the Supervisor/Engineer.
- 35. Bentonite slurry or similar debris generated from pile driving or other construction activities shall be disposed of to avoid overflow into the surface water bodies or form mud puddles in the area.
- 36. All arrangements for transportation during construction including provision, maintenance, dismantling and clearing debris, where necessary, will be considered incidental to the work and should be planned and implemented by the contractor as approved and directed by the Engineer.
- 37. Vehicle/machinery and equipment operations, maintenance and refueling shall be carried out to avoid spillage of fuels and lubricants and ground contamination. An oil interceptor will be provided for wash down and refueling areas. Fuel storage shall be located in proper bounded areas.
- 38. All spills and collected petroleum products shall be disposed of in accordance with standard environmental procedures/guidelines. Fuel storage and refilling areas shall be located at least 300m from all cross drainage structures and important water bodies or as directed by the Engineer.

### Annex 3: Summary of the World Bank Safeguards Operational Policies

<p><b>OP 4.01 Environmental assessment</b></p>	<p>The objective of the policy is to ensure the projects financed by the Bank are sound and sustainable, and decision making be improved through an appropriate analysis of actions and of their potential environmental impacts. This policy is triggered if a project is likely to have environmental risks and impacts (adverse) on its area of influence. OP 4.01 covers the environmental impacts (nature air, water and land); human health and security; physical cultural resources; as well as transboundary and global environmental problems.</p>	<p>Depending on the project, and nature of impacts a range of instruments can be used: EIA, environmental audit, hazard or risk assessment and environmental management plan (EMP).When a project is likely to have sectoral or regional impacts, sectoral or regional EA is required. The EIA is the responsibility of the borrower.</p> <p>In the framework of the CDP, an Environmental and Social Management Plan was prepared (ESMF), including an Impact Mitigation Plan; the ESMF will help assess the impacts of future activities if necessary and orient implementation.</p>
<p>OP 4.04 Natural Habitats</p>	<p>This policy recognizes that the conservation of natural habitats is essential for long-term sustainable development. The Bank, therefore, supports the protection, maintenance, and rehabilitation of natural habitats in its project financing, as well as policy dialogue and analytical work. The Bank supports, and expects the Borrowers to apply, a precautionary approach to natural resource management to ensure opportunities for environmentally sustainable development.</p>	<p>This policy is triggered by any type of project (including any sub project under sectoral investment regime or intermediary funding) that have the potential to cause some important conversion (loss) or degradation of natural habitats, whether directly (by the construction) or indirectly (by human activities triggered by the les project).</p> <p>In the CDP, certain activities that could have adverse impacts on natural habitats will not be funded.</p>
<p><b>OP 4.36 Forests</b></p>	<p>The objective of this policy is to help borrowers exploit the potential of forests in order to curb poverty in a sustainable manner, efficiently integrate forests in sustainable economic development and protect vital local and global environmental services and forests values. Where forest</p>	<p>This policy is triggered each time an investment project financed by the Bank: (i) has the potential to cause health impacts and the quality of forests or the rights and the well being of the people and their dependency level with the interaction with forests; or (ii) aims at bringing some change in the uses of natural</p>

	restoration and plantation are needed in order to achieve these objectives, the Bank helps borrowers in forest restoration activities in order to maintain or develop biodiversity and the operation of ecosystems. The Bank help borrowers in the creation of forest plantations appropriate from the environmental viewpoint and socially beneficial and economically sound in order to help meet the growing forests’ needs and services	forests or plantations.  In the CDP, the activities that will adversely affect the quality of the forests or bring in some change in the management will not be financed.
<b>OP 4.09 Pest Management</b>	The objective of this policy is to promote the use of biological or environmental control methods and reduce reliance on synthetic chemical pesticides. In Bank-financed agricultural operations, pest populations are normally controlled through Integrated Pest Management (IPM) approaches. In Bank-financed public health projects, the Bank supports controlling pests primarily through environmental methods. The policy further ensures that health and environmental hazards associated with pesticides are minimized. The procurement of pesticides in a Bank-financed project is contingent on an assessment of the nature and degree of associated risk, taking into account the proposed use and the intended user.	The policy is triggered if procurement of pesticides is envisaged (either directly through the project or indirectly through on-lending); if the project may affect pest management in a way that harm could be done, even though the project is not envisaged to procure pesticides. This includes projects that may lead to substantially increased pesticide use and subsequent increase in health and environmental risks; and projects that may maintain or expand present pest management practices that are unsustainable.  In the framework of the CDP, the activities requiring the use of pesticides (agricultural activities) could be financed. That is why a Pest and Pesticides Management Plan is prepared separately, as an annex to the present document
<b>OP 4.11 Cultural property</b>	The objective of this policy is the help countries avoid or reduce the adverse impacts of development projects on physical cultural resources. In order to implement such policy, the word “physical cultural resources” means movable and unmovable objects, sites, structures, natural’s aspects of landscapes that have an importance form the archeological, paleontologic, historic, architectural,	This policy applies to all projects included in category A or B of the Environmental assessment scheduled in OP4.01.  With the CDP, activities that are likely to have adverse impacts on cultural property will not be financed.

	religious, aesthetic or other. Physical cultural resources could be found in urban or rural areas, as well as both in the open air, under the ground and in the sea also.	
<b>OP 4.10 Indigenous populations</b>	The objective of the policy is (i): ensure that the development process encourages full respect of dignity, human rights and cultural features of indigenous people; (ii) ensure they do not suffer from the detrimental effects during the development process; and ensure indigenous people reap economic and social advantages compatible with their culture.	The policy is triggered when the project affects indigenous people (with the characteristics described in OP 4.10) in the area covered by the project. There are no indigenous people in Gambia. Thus, the CDP is not triggered by this policy.
<b>OP 4.12 Involuntary Resettlement</b>	The objective of this policy is to avoid or minimize involuntary resettlement where feasible, exploring all viable alternative project designs. Furthermore, it intends to assist displaced persons in improving their former living standards; it encourages community participation in planning and implementing resettlement; and to provide assistance to affected people, regardless of the legality of title of land.	This policy is triggered not only if physical relocation occurs, but also by any loss of land resulting in: relocation or loss of shelter; loss of assets or access to assets; loss of income sources or means of livelihood, whether or not the affected people must move to another location.  Under CDP, a Resettlement Policy Framework (RPF) has been prepared which will serve as guidance for the preparation of a RAP should land acquisition be required.
<b>OP 4.37 Dams security</b>	The objectives of this policy are established as follows: For new dams, ensure the design and supervision are done by experienced and competent professionals; for existing ones, ensure that any dam that can influence the project performance is identified, an assessment of the dam security conducted, and the other required safety measures and corrective measures implemented.	The policy is triggered when the Bank finances (i) a project involving the building of a big dam (15 m of height or more) or a dam presenting great hazard; and (ii) a project depending on another existing dam. For small dams, general safety measures designed by qualified engineers are appropriate.  In the framework of the CDP, no funds will be available for the building or renovation of dams
<b>OP 7.50 Projects implemented on international waterways</b>	The objective of this policy is to operate in such a way as the projects financed by the Bank affecting the international watercourses do not affect: (i) the relationships between the Bank and her	This policy s triggered if (a) A river, a channel, lake or any other watercourse located between two states, or a river or a surface river discharging into a river located in one or two states, be they members

	<p>borrowers and between States (members or non members of the Bank); and (ii) the international watercourses are used and efficiently protected?</p> <p>The policy applies to the following project types: (a) hydro electric, irrigation, flood control, drainage, water collection, industrial and other projects involving the use or potential pollution of international watercourses, and (b) detailed studies for project design under item (a) above quoted including those carried out by the Bank in her position of implementation agency or else.</p>	<p>of the World Bank or not</p> <p>(b) a river branch which is a component of a watercourse described under item (a); recognized to be a necessary communication channel between the ocean and the other states, and any river discharging into these waters and (c) a bay, strait, or channel bound by two states or more or flowing in an unknown state.</p> <p>In the CDP, activities that are likely to have an impact on international waterways will not be financed.</p>
<p><b>OP 7.60 Projects located in contentious zones</b></p>	<p>The objective of this policy is to operate in such a way as the problems experienced by projects in contentious areas are tackled as early as possible so that: (a) the relationships between the Bank and member countries are not affected; (b) the relationships between the borrower and neighbors are not affected; and either the Bank or concerned countries do not suffer any damage because of this situation.</p>	<p>This policy is triggered if the project proposed is located in a «contentious area». In Gambia, there are no contentious zones. So, the CDP is triggered by this policy.</p>

## **Annex4: Draft Terms of Reference for Environmental Assessment**

### **Introduction and Context**

This part will be completed at time and will include necessary information related to the context and methodology to carry out the study.

### **Objectives of study**

This section will indicate (i) the objectives and the project activities; (ii) the activities that may cause environmental and social negative impacts and needing adequate mitigation measures.

### **Mission /Tasks**

The consultant should realize the following:

- Describe the des biophysical characteristics of the environment where the project activities will be realized; and underline the main constraints that need to be taken into account at the field preparation, during the implementation and exploitation/maintenance of equipment.
- Assess the potential environmental and social impacts related to project activities and recommend adequate mitigation measures, including costs estimation.
- Assess the need of solid and liquid waste management and suggest recommendation for their safe disposal, including safe disposal of asbestos
- Review political, legal and institutional framework, at national and international level, related to environmental, identify the constraints and suggest recommendations for reinforcement
- Identify responsibilities and actors for the implementation of proposed mitigation measures
- Assess the capacity available to implement the proposed mitigation measures, and suggest recommendation in terms of training and capacity building, and estimate their costs.
- Develop an Environmental Management Plan (EMP) for the project. The EMP should underline (i) the potential environmental and social impacts resulting from project activities (ii) the proposed mitigation measures; (iii) the institutional responsibilities for implementation; (iv) the monitoring indicators; (v) the institutional responsibilities for monitoring and implementation of mitigation measures; (vi) the costs of activities; and (vii) the calendar of implementation.
- Public consultations. The EIA results and the proposed mitigation measures will be discussed with population, NGOs, local administration and other organisations mainly involved by the project activities. Recommendations from this public consultation will be include in the final EIA report.

### **Plan of the EIA Report**

- Cover page
- Table of contents
- List of acronyms

- Executive summary
- Introduction
- Description of project activities
- Description of environment in the project area
- Description of political, legal and institutional framework
- Description of methodology and techniques used in assessment and analyse of project impacts.
- Description of environmental and social impacts for project activities
- Environmental Management Plan (EMP) for the project including the proposed mitigation measures; the institutional responsibilities for implementation; the monitoring indicators; the institutional responsibilities for monitoring and implementation of mitigation; Summarized table for EMP
- Recommendations
- References
- List of persons / institutions meet

#### Qualification of the Consultant

The Consultant will be agreed by the PCU in carrying out EIA studies.

#### Duration of Study

The duration of study will be determined according to the type of activity

#### Production of Final Report

The consultant will produce the final report one (1) week after receiving comments from the PCU

#### Supervision of Study

The consultancy will be supervised by the Environmental and Social Focal Points and the PCU

## Annex 5a: Summary of discussions with representatives of Government agencies

i) Meeting with the Construction Programme Manager, Mr. Ebou Serign Gaye, (PCU) on Tuesday 2<sup>nd</sup> January 2018

The Programme Manager emphasized the need to see that safeguards policies are fully implemented during the project implementation. This, he said, will require a better understanding of the safeguards instruments. He therefor insisted on the need to train the construction monitors and the contractors especially on the World Bank safeguards policies. Mr. Gaye also referred to some of recommendations of the last audit report which need to be taken in to account.

With respect to the implementation arrangements, Mr. Gaye suggested the possibility of having two focal points –one for social and the other for environmental. On the supervisory role of the other implementation partners namely: NEA and DWR, Mr. Gaye expressed the need to maintain them based a revised MoU. However, he said DWR will be expected to do a better next time.

ii) Meeting at the Department of Lands and Surveys on Thursday 4<sup>th</sup> January 2018

The meeting was chaired by the Director of Lands and Surveys, Mr. Kebba Ceesay, and attended by the Director of Physical Planning and Housing, Mr. Musa Badgie, and the Valuation Officer, Mr. Omar Darbo. The officials presented the various laws and regulations relating to land administration, particularly the State Lands Act 1991, the Lands (Regions) Act 1991 which was formerly known as the Provinces Land Act. They explained the increasing pressure on land particularly in urban and peri-urban areas. Therefore it was important, they explained that Government agencies consult with their when discussing a project that may require land.

They also raised the issue of the high compensation costs and question the ability of the Government to make such payments when the annual allocation from the Ministry of Finance is very low. This situation is further complicated by the fact that in the urban areas the people whose land is required for the project are asking for in-kind land compensation and not cash compensation which they consider to be small and the Government does not have enough land in the urban areas to address all these land need. There is an increasing awareness of the value of land. However, it was generally recognized that in the regions where the GESSP is to be implemented land availability is less acute.

iii) Meeting with the Acting Programme Manager, Mr. Abdoulie Sowe, on Thursday 4<sup>th</sup> January 2018

The meeting was attended by the Procurement Officer, Mr. Addison Gomez. The Acting Programme Manager, expressed the need for an early conclusion of the study to allow the proposed project to move forward. He emphasized the supervisory role of NEA in the

implementation of the safeguards policies and said that the PCU will work hard to improve relations which were raised in audit report on the READ Project. He suggested that the nationwide supervision missions should be biannual and not quarterly in view of the category B status of the project. However, the internal monitoring at the level of PCU should be strengthened by building the capacity of the construction monitors and the focal point.

iv) Meeting with the Construction Monitors on Thursday 4<sup>th</sup> January 2018

The meeting was chaired by Mr. Musa Jassey, Quantity Surveyor, and attended by four of the six CMs. The meeting discussed the important role of the CM in the screening and monitoring programme. The CMs raised the issue of a structured training to allow a better understanding of the safeguards policies which will give them a sense of direction common to all. They also expressed the need to meet before the project starts to have a common understanding of all the key activities relating to the implementation of the safeguards instruments. This will ensure monitors have a common understanding and approach and also allow a consistent assessment of the compliance of contractors.

The Monitors also raised the issue of having proper coordinates for all land donated to avoid the risks of encroachment which sometimes occur when villagers give land. For this purpose they recommended that the project should provide a Global Positioning System (GPS) for all monitors to establish the exact coordinates for land donated to the school.

Finally the CM lamented the problem of mobility. Their work, they said, is very much constrained by the lack of mobility which limits the number of site visits. They find the motorcycle inadequate in view of the large distances to be travelled, the frequency of travel and the risks associated with their on some of the tracks in the rural tracts.

v) Meeting with the officials of the National Environment Agency: Monday 8<sup>th</sup> January 2018

The meeting was Chaired by the Executive Director of NEA, Mr. Momodou Suwareh, and attended by Messrs Harouna Jobe (Senior Programme Officer Agriculture and Natural Resources) and Buwe Hdara (). The Executive Director expressed the need for closer collaboration and partnership to facilitate the implementation of the supervision responsibilities assigned to his agency. In the past this has not been the case and as a result NEA has not been able to fulfill its role properly. The release of funds has been a particularly difficult issue as a result of misunderstandings which need to be addressed in the new arrangement. With respect to the number of nationwide monitoring the Agency agreed to biannual visits with the Regional Environmental Officers doing quarterly visits in their regions. The agency also accepted to take part in any training programme on safeguards policies.

The consultant requested the agency to prepare an indicative budget of their supervision and training activities. This was prepared and submitted.

vi) Meeting with the Senior Education Officer responsible for Planning and Human Resources in Region 4, Mr. Musa Bah, on Wednesday 10<sup>th</sup> January 2018

The discussion focused on the responsibilities of the various staff at the Regional Directorate in order to determine how they can contribute to an effective implementation of the safeguards policies. Mr. Bah explained that the Director handles policy matters, sensitization on education in the communities and land matters. When a community cannot resolve the land issue the Director would normally refer the issue to the District Chief and subsequently the Governor. The CM helps to determine the suitability of the land in terms of the location and the topography.

The Cluster Monitors are responsible for a minimum of 8 schools and their role is to monitor compliance with educational standards and provide technical support to the head teachers. Through cluster meetings they identify needs. The Planning Focal Point is responsible for school mapping.

The work of the Regional Directorate is supported in the area of environment by the Regional Environment Officers who sometimes called on to join supervision missions or visit certain location/ schools to assess the environmental situation.

There is overall adequate capacity at the regional level to provide the screening exercise as well as the monitoring of the implementation of the safeguards policies. For effectiveness it is important to include these different categories of staff at regional level in any future safeguards training.

vii) Meeting with the Permanent Secretary, Mr. Mohammed B. S. Jallow: on Friday 12<sup>th</sup> January 2018

The consultant had a final meeting with the Permanent Secretary and the staff of the PCU to discuss some of the key findings. On implementation the meeting proposed the retention of one Focal Point within the PCU that will be responsible for overseeing and supervising the CMs. However, it will be necessary to build the capacity at the different levels to ensure a proper understanding of the safeguards policies especially those of the World Bank.

On the site visit the consultant reported on the enthusiasm of the communities except one (Fass Chaho) for the project and their willingness to provide land. The sites were randomly selected. In addition to the schools, some of the communities also raised other development needs such as health facility and water supply.

The meeting also discussed at length the issue of allocating vehicles to CM to facilitate and improve their mobility. The Permanent Secretary agreed to have the matter further reviewed.

On the monitoring of the water facilities the Permanent Secretary expressed the view to end the arrangement with DWR and explore the private sector to deliver this service. The use of the services of DWR was discussed earlier, he said and the decision reached was to use the private sector because it was believed will be more efficient.

The meeting also agreed on improving the relationship with NEA and as part of this process Mr. Jallow said they had been inviting the agency to CCM meetings and REO have been invited to take part in the quarterly project site visit by the PCU. These developments need to be strengthened.



Meeting with the Permanent Secretary and Staff

### **Annex 5b: Summary of Consultations with the potential beneficiary communities 8<sup>th</sup>-10<sup>th</sup> January 2018**

The selection was made out of a comprehensive list of all potential sites based on the Planning Units assessment. For the time available a total of 7 sites were visited Regions 3, 4, and 5 and they include:

- i. Fass Chaho-Upper Niumi District North bank Region;
- ii. Bereto- Illiasa District-NBR
- iii. Ballanghar Chamen-Lower Saloun District- CRR North
- iv. Wellingara-Kejaw- Lower Fulladu West- CRR South
- v. Moria- Niamina East-CRR South
- vi. Kundon Fulakunda, Kiang Central, LRR
- vii. Wudeba, Kiang West, LRR.

At the meetings the GESSP was introduced stating the main objectives and the planned activities. The project requirement for land was explained and the fact that any land given will have to be the subject of a donor certificate and that such land will be the permanent property of the school. The villagers were informed that they were not under obligation to give land however, if land is not available then the project will have to go elsewhere where land is available.

The mission also explained the need for consultation and participation before, during and after the project because the schools should be seen as belonging to the community so the involvement of the community from the start will give them the opportunity to have their views taken into account and thereby facilitate ownership and sustainability.

In general the communities welcomed the possibility of having the ECD as they saw it as a beginning that can lead to further development. In some cases the communities said that this was a development they were looking for over twenty years (Wudeba and Mria villages). It was only in Fass Chaho that the community rejected the school saying they were interested in traditional daara which was established by the elders. They will only accept an ECD if it goes together with support for their daara. This is a traditional centre of koranic studies although some members of the community are already sending their children to western type education school in neighbouring villages. Although the proposed ECD does not address their needs the mission advised them to contact the PCU for possible assistance under the 'daara' scheme.

The communities also took the opportunity of our presence to raise other development issues for their communities such as health facility and water supply (Wudeba and Ballagher Chamen). The mission explained that this will have to be handled by other competent Government agencies. With respect to water supply they were informed that the proposed ECD will also include water supply points which will benefit the community.

It was interesting to note that in Balaghar Chamen it was the women who insisted and convinced the men to fully endorse the ECD project. One of them, Njome Ceesay, put up a strong case for the ECD saying it is when you travel that you appreciate the value of learning. Even letters received in the village have to be taken elsewhere to be translated. The community certainly needs a school and an ECD is a good beginning.

All the communities that accepted to have the ECD indicated their willingness to provide land on the conditions explained and promised to cooperate fully with the project to ensure ownership and success. They also promised to ensure that the community provides annually sufficient children to the school.



Meeting with the community in Kundon Fulakuna

**Table 6: List of communities visited with their observations**

S/No.	Community	Key remarks /observations by the community
1	Fass Chaho Community Mostly Wolof	Not interested in the EDC but would welcome support if it can be combined with daara education The priority for the community is to ensure that the children have basic quoranic education. Western education, they said, can come after they have received their daara education
2	Bereto Community mainly Mandinka	Express delight for the opportunity to be considered for the new project as it will reduce the distance to travel to school for the young ones some of whom are not attending school presently because of the distance to Farafenni (about 3-4 km) Sometimes children have to stop going if they are not well / have physical handicap because of distance. Mrs Amie Mboge referred to the case of her daughter who to stop because she was not very well and could not walk the long distance to Farafenni. Land they said will be available for construction The community raised the problem of water supply
3	Ballanghar-Chamen Community mainly wolof	The women insisted on having the ECD and they were joined by the men after an initial hesitation on their part. They expressed appreciation for being consulted on this matter especially since this is the first time they are given such an opportunity. They promised to make land available for the ECD. The community raised the problem of water supply for the community
4	Wellingara Kejaw Community mainly mandinka and some fula	The Community welcomed the ECD because presently some of the children have to travel to Brikamaba and Saruja while the younger ones stay at home. The ECD will also offer greater security. They requested that the contractors give employment opportunities to local people if possible
5	Moria Mixed community of Mandinka, Wolof and Fula	Expressed delight in the possibility to have an ECD because they are far from schools in Sinchu Bundu and Kudang..They cited the case of one Mamadou who had to withdraw four of her daughters from school in the neighbouringvillage because of the distance they have to travel after they close from the afternoon session. They confirmed availability of land
6	Kundon Fulakunda Mainly Fula with some Mandinka and wolofs	Expressed delight in the opportunity as they have been after the Government for the last 20 years Because of the distance many of the younger children cannot travel to the schools in the neighboring villages of Jiroff, Nema and Kwinella They confirmed the availability of land and assured the mission that they will work had to ensure the school has regular supply of children

		The community expressed the need for health facility. They were informed that this would be better addressed by the Ministry of Health.
7	Wudeba Mainly Fula and some Mandinka	They also welcome the ECD and said the nearest school is Dumbuto about 3 km away and which little children cannot walk to so they do not go to school They also confirmed availability of land on the conditions explained by the mission. The VDC chairperson said the women will regularly monitor school attendance and ensure that all parents sent all the children to the ECD

### Annex 6a: List of Persons Contacted in Government institutions/agencies

NAME	FUNCTION	INSTITUTION	TEL	EMAIL
Mr. Mohammed B. S. Jallow	Perm. Secretary	MoBSE		<a href="mailto:msjallow@gmail.com">msjallow@gmail.com</a>
Mr. Abdoulie Sowe	Acting Project Mgr.	PCU, MOBSE	9966871	<a href="mailto:Aasowe45@gmail.com">Aasowe45@gmail.com</a> <a href="mailto:Gpn.pcu@edu.gm">Gpn.pcu@edu.gm</a>
Mr. Ebou Serign Gaye	Construction Prog. Manager	PCU,	9960661	<a href="mailto:ebouserigngaye@yahoo.com">ebouserigngaye@yahoo.com</a> <a href="mailto:cpm@edugambia.gm">cpm@edugambia.gm</a>
Musa Jasey	Quantity Surveyor & ESFP		3308980	<a href="mailto:mukjasy@yahoo.com">mukjasy@yahoo.com</a>
Mr. Musa Bah	Snr. Educ. Officer	Region 4, MoBSE	6303063	<a href="mailto:musabahdongoroba@gmail.com">musabahdongoroba@gmail.com</a>
Mr. Addison Gomez	Procurement Manager		9914525 9964525	<a href="mailto:Addison_ms@yahoo.com">Addison_ms@yahoo.com</a>
Mr. Yaya Sanyang	Construction Monitor		3360129	<a href="mailto:yahyamas2000@gmail.com">yahyamas2000@gmail.com</a>
Mr. Mamudu Ceesay			9918160	<a href="mailto:mamudouceey8960@yahoo.com">mamudouceey8960@yahoo.com</a>
Mr. Ousman Bojang			3305778	<a href="mailto:baousman@gmail.com">baousman@gmail.com</a>
Mr. Momodou Suwareh	Executive Director	NEA	9962978	
Mr. Aarouna Jobe	SPO-agric. & NR		9993622	<a href="mailto:arunajobe@gmail.com">arunajobe@gmail.com</a>
BUWE Haidara			9502012	<a href="mailto:Mrhydara99@gmail.com">Mrhydara99@gmail.com</a>
Mr. Kebba	Director	Dept of Lands	9910436	<a href="mailto:ckebba@yahoo.com">ckebba@yahoo.com</a>

Ceesay		& Surveys		
Mr. Musa Badgie	Director	Dept Physical Planning & Housing	9960228	<a href="mailto:mbadgie@yahoo.com">mbadgie@yahoo.com</a>
Mr. Dawda Darbo		Dept. of Lands		

### Annex 6b : List Persons contacted at the Potential Project sites

Name	Function	Village	Tel.
Momat Saho	Alkali	Fass Chaho	
Bubacar Saho	Dep. Alkali	“ “	2055854
Alh. Tijan Saho	Khalif	“ “	
Alaji K. Saho	Secretary, VDC		7201940
Alh. Bubu Jah	Elder	“ “	
Aja Seinabu Faal	Women Elder	“ “	
Abdou Kanteh	Alkali	Bereto	
Omar Keita	Cashier, VDC	“ “	3904890
Imam Abdu Suno	Imam	“ “	
Ebrima Marong	Member, VDC	“ “	6670596
Mariama Kanteh	Member women kafo	“ “	6996833
Binta Sawaneh	Women Youth leader	“ “	
AMIE Mboge	Member women’s kafo	“ “	6931648
Modou Cham	Alkali	Ballanghar Chamen	
Sait Cham	Imam	“ “	
Ali Cham	Youth leader	“ “	
Alaji Cham	Youth Leader	“ “	
Ousman Cham		“ “	
Njome Ceesay	Women Leader	“ “	
Fatou Cham	“ “	“ “	
Mbengue Touray	“ “	“ “	
Samba Jaiteh	Alkali	Wellingara Kejaw	6313607
Bamba B. Sanneh	Chairman , VDC	“ “	6392564
Sidi Keita	Village Elder	“ “	6210520
Mama Fatty	Women Elder	“ “	7612861
Isatou Fatty	“ “	“ “	
Mariama Dumbuya	Member VDC	“ “	
Kaddy Drammeh	“ “	“ “	
Kaddy Sidibeh	Alkali	Moria	7958079
Fatou Camara	Sec. Women Garden Kafo	“ “	3623875
Seit Jobe	Member VDC	“ “	70227581

Isatou Keita	Member Women Garden Kafo	“	“	7018417
Momad jallow	V/Chairman VDC	“	“	
Amina Jobe	Member Women Garden Kafo	“	“	7796476
Sireh Keita	“	“	“	6319034
Kebba Jarra	Asst. Alkali	Kundon Fulakunda		6961648
Alasan Tarawalle	Village Elder	“	“	2189367
Omar Jarra	VDC Member	“	“	7376615
Mamadou Bah	“	“	“	7636304
Kaddy Yabo	“	“	“	2342099
Subba Jawo	Chairman VDC	“	“	2573628
Awa Jawo	VDC Member	“	“	2775702
Mai Yabo	“	“	“	2993030
Yaya Bah	“	“	“	7841062
Lamin Jawo	“	“	“	6213058
Isatou Jarra	“	“	“	7098902
Burama Kolley	Village Elder	Wudeba		7775087
Ebrima Jallow	Youth Leader	“	“	7970932
Omar Kolley	Member VDC	“	“	2845460
Mrs. Adama Bah	Chair person VDC	“	“	7837678
Isatou Ceesay	Village Elder	“	“	7039295
Ismaila Jallow	Youth leader	“	“	7987066
Omar Bah	Member VDC	“	“	7615127
Samba Sidibeh	Village Elder	“	“	6209675
Habib Jallow	Youth Leader	“	“	2298175
Mamad Saloum	“	“	“	

## Annex 7: Bibliography

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## **Annex 8: Terms of Reference (TOR)**

### **Terms of reference for the Environmental and Social Management Framework for The Gambia Education Sector Support Program**

#### **I. Introduction**

The Government of The Gambia in collaboration with The World Bank is preparing a Project Appraisal Document (PAD) which gives an outline of a future education sector support program. The program will serve as successor to the Results for Education Achievement and Development Project (READ) and would consolidate the achievements made thus far in the sector by placing particular emphasis on educational access, and improvement of quality of teaching and learning.

#### **II. Project Objectives**

The proposed project seeks to increase access to ECD and basic education and improve quality of teaching and learning.

#### **III. Project Components**

The Project comprises three main components: i) Enhancing Access to ECD and Basic Education; ii) Improving Quality of Teaching and Learning; iii) Technical and Institutional Support

##### **Component 1: Enhancing Access to ECD and Basic Education**

The aim of this component is to expand inclusive education for all, with an emphasis on geographic and economic disparities, gender, students with disabilities, and other vulnerable groups, through a blend of demand side and supply side interventions. On the supply side, access will be expanded through construction of new classrooms ECD and LBS classrooms, and continued provision of school transportation in selected communities. On the demand side, access will be expanded through a program which modernizes 'daaras' (Koranic schools) by introducing an adapted curriculum through a results oriented financing model in targeted regions, supported by a sensitization campaign.

##### **Component 2: Improving Quality of Teaching and Learning**

Under this component the Project will support a set of interventions that will lead to the implementation of a revised curriculum for ECD, lower basic, and upper basic schools, with a particular focus on English. In addition it will develop a strategic framework and coherent policy for an improved teacher training and professional development pre-service and in-service teacher training which views teacher education along a continuum.

##### **Component 3: Technical and Institutional Support**

This component will support capacity building for evidence based decision making in the sector and provide support for the implementation of the communication strategy including procuring equipment, materials, publishing, dissemination, logistics, and administration. The Project will also provide support to the implementing agency for capacity building initiatives and project management as well financing the project coordination unit (PCU) salaries and operating costs to coordinate the proposed project, and building MoBSE and MoHERST staff capacity development.

## II. Objective of the Environmental and Social Management Framework (ESMF)

The objective of this Environmental and Social Management Framework (ESMF) is to provide an environmental and social screening process for future infrastructure investments for which the exact locations are not known prior to appraisal, and for which appropriate mitigation measures might be required. The ESMF is intended to be used as a practical tool during project implementation.

The proposed screening process would be consistent with the Bank's safeguard policy OP 4.01 Environmental Assessment. This policy requires that all Bank-financed operations are screened for potential environmental and social impacts, and that the required environmental work be carried out on the basis of the screening results. Thus, the screening results may indicate that (i) no additional environmental work would be required; (ii) the application of simple mitigation measures by qualified staff would suffice; or (iii) a separate environmental impact assessment (EIA) would be required.

Although the potential environmental and social impacts of the infrastructure investments are expected to be generally minimal, potentially significant localized impacts may occur, thus requiring appropriate mitigation. Potential social impacts would be addressed in the context of the Resettlement Policy Framework (RPF). The RPF is to be prepared as a separate document and will outline the policies and procedures to be applied in the event of land acquisition, loss of livelihood or access to livelihood under the project.

## III. Scope of Work

To develop an Environmental and Social Management Framework (ESMF) the consultants will carry out the following tasks:

- a) Review The Gambia's environmental policies, laws, procedures, regulatory and administrative frameworks to determine which legal requirements are relevant to the infrastructure investments under the project and therefore will have to be incorporated into the ESMF, and make recommendations as appropriate;
- b) Review the Bank's ten Safeguard Policies and (i) determine which of these policies are likely to be integrated as a result of future infrastructure investments under the project; (ii) identify gaps between the Safeguard

Policies and the national legislation and make recommendations as to how to implement the relevant safeguard Policies in the context of the ESMF;

- c) Review the bio-physical and socio-economic characteristics of the project area and (i) identify potential environmental and social impacts that might result from future infrastructure investments; (ii) propose appropriate mitigation measures; (iii) outline environmental impact assessment procedures; (iv) establish linkages to the RPF as necessary, and (v) make recommendations regarding the implementation and monitoring of environmental and social mitigation measures in the context of the ESMF as appropriate;
- d) In the light of the available information, develop an environmental and social screening process, including monitoring indicators, for future infrastructure investments under the project, capturing the steps below (and others as appropriate):
  - 1. Screening of physical infrastructure investments
  - 2. Assigning the appropriate environmental categories
  - 3. Carrying out environmental work
  - 4. Review and approval
  - 5. Public consultation and disclosure
  - 6. Monitoring
  - 7. Monitoring indicators
- e) In light of the available information, identify areas that would require institutional strengthening for environmental management, including cost estimates and time horizons, to ensure that the requisite capacity exists under the project to implement the ESMF efficiently;
- f) In light of the above recommendations, prepare an Environmental Management Plan (EMP) for the entire project; the EMP is to outline the institutional responsibilities, including cost estimates and timelines for the (i) identification of environmental and social impacts; (ii) preparation and implementation of mitigation measures; (iii) monitoring of the implementation of mitigation measures; (iv) monitoring indicators; and (v) capacity building needs, including related training needs and costs. A summary table should be prepared for ease of reference.

#### IV. Output

The consultant(s) will prepare an Environmental and Social Management Framework (ESMF) that will be used by project implementers at the planning stage of the physical infrastructure investments. Hence, the ESMF is to be used as a practical tool during project implementation.

## V. Reporting

The ESMF will be written in English and will include the following sections:

- Cover page
- Table of contents
- List of acronyms
- Executive summary
- Introduction
- Project description
- Objectives of the Environmental and Social Management Framework (ESMF)
- Methodology used to prepare the Environmental and Social Management Framework (ESMF)
- Overview of The Gambia's environmental policies, laws, procedures, regulatory and administrative frameworks
- Overview of the World Bank's ten Safeguard Policies
- Environmental impacts due to infrastructure investments
- Social impacts due to infrastructure investments
- The environmental and social screening process:
  - Steps required
  - Annexes
    - Environmental and Social Screening Form (Sample)
    - Environmental and Social Checklist (Sample)
    - Procedures for the construction/rehabilitation of infrastructure investments requiring environmental work
    - Summary of the World Bank's Safeguard Policies
    - Others, as necessary
- Environmental Management Plan (EMP) for the entire project
  - Proposed infrastructure investments
  - Environmental and social impacts
  - Mitigation measures
  - Institutions responsible for implementing the mitigation measures
  - Institutions responsible for monitoring the implementation of the mitigation measures
  - Timing
  - Costs
  - Monitoring indicators
  - Summary table
- Recommendations

- List of individuals/institutions contacted
- References

#### VI. Staffing of the Consultancy and Duration of Assignment

The consultancy would require expertise in environmental assessment, environmental management and strengthening of institutional capacity in these areas.

The duration of the assignment would be about five weeks, involving three weeks of field and two weeks writing the Environmental and Social Management Framework (ESMF).

An electronic copy of the ESMF should be made available to the Government of The Gambia and the World Bank by end of ..... 2017, and the final draft electronic document should be available before appraisal.

## Annex 9: The Methodology for the study

The methodology consisted of the following:

➤ Literature Review

This consisted of a review of relevant background documents (the draft PAD, relevant legal and policy documents on environmental management, the Audit Report of the implementation of the READ project, etc.). The list of the documents consulted is provided in **Annex 7**.

➤ Consultations and visits to potential sites

The visits and the consultations provided the opportunity to:

- See some of the potential project intervention sites and to discuss with the local communities about the project and some of the potential environmental and social issues such as clean environment and land
- Collect any particular concerns/issues that the beneficiaries may wish to raise about the proposed project;
- Identify specific interests and discuss potential roles and responsibilities of beneficiaries that would facilitate their participation, ownership and sustainability of the project.

The consultations took the form of interviews with representatives of relevant government agencies and focus group discussions with potential project beneficiaries at the community level. The list of persons interviewed is attached as **Annex 6a and 6b**. The summary of the interviews are attached as **Annex 5a and 5b**.

➤ National workshop

A national workshop was convened to discuss the draft audit report with the representatives of the various stakeholders. The comments/observations coming out of the workshop and those from the World Bank were incorporated in the final report to improve the quality.