

Republic of Senegal

**Senegal Digital Economy Acceleration Project  
(P172524)**

**Negotiated Draft**

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

**December 19, 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Senegal (representing the Republic of Senegal, the Recipient) will implement the Senegal Digital Economy Acceleration Project (P172524) (the Project), with the involvement of the Ministry of Digital Economy and Telecommunications (*Ministère de la Communication des Télécommunications et de l'Economie Numérique, MCTEN*) and the Ministry of Health and Social Action (*Ministère de la Santé et de l'Action Sociale, MSAS*). The International Development Association (Association) has agreed to provide financing for the Project , as set out or referred to in the agreement entered into for the financing of the Project (Financing Agreement).
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is included by reference in, and is a part of, the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Financing Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient shall, through the relevant units (each a PIU) to be established at MCTEN and MSAS, update the ESCP to reflect these changes, and the Recipient and the Association shall agree on such updated ESCP through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 05 days after the end of each reporting period.</p>	<p>Both PIUs (MCTEN and MSAS)</p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injuries. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	<p>PIUs (MCTEN and MSAS)</p>
C	<p><b>CONTRACTORS’ MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	<p>Submit monthly reports to the Association.</p>	<p>PIUs (MCTEN and MSAS)</p>
D	<p><b>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</b></p>	<p>No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the CRD, issuance of CRD decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).</p>	<p>PIUs (MCTEN and MSAS)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Notify the Association of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) <sup>1</sup> to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Association of: (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.		
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<b>ORGANIZATIONAL STRUCTURE</b>  Ensure that each PIU includes at least one (1) qualified environmental and social specialist, with resources to support management of ESHS risks and impacts of the Project.	Hire one (1) environmental and social specialist, in each PIU no later than three months after the Project Effective Date; and thereafter maintain these positions throughout Project implementation.	PIUs (MCTEN and MSAS)
1.2	<b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b>  Prepare, consult, adopt and disclose and thereafter implement site specific Initial Environmental Assessment (IEA)/ Environmental and Social Management Plan (ESMP) for each site where Project activities will be implemented, which should, inter alia, include proper procedures for handling, storing and disposing of hazardous and non-hazardous waste, including electronic waste (e-waste).	Adopt and disclose the IEA/ESMP before launching the bidding process for the respective site and prior to the procurement of Information and Communication Technology (ICT) equipment. Once adopted, implement the respective ESMP throughout the implementation of Project activities on such site.	PIUs (MCTEN and MSAS)
1.3	<b>MANAGEMENT OF CONTRACTORS</b>	As part of the preparation of procurement documents and respective contracts.	PIUs (MCTEN and MSAS) Contractors and supervising firms

<sup>1</sup> DAAB is referring to the contractual mechanisms, included in the Standard Procurement Documents for works that apply General Conditions of the International Federation of Consulting Engineers (FIDIC).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures (LMP), and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter, ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	Supervise contractors and civil work supervisors throughout Project implementation.	
1.4	<b>TECHNICAL ASSISTANCE</b> Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project, are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.	Throughout Project implementation.	PIUs (MCTEN and MSAS)
1.5	<b>CONTINGENT EMERGENCY RESPONSE FINANCING</b>  a) Ensure that the CERC Manual and or its Emergency Action Plan referred to in the Financing Agreement includes a description of the ESHS assessment and management arrangements, and if applicable a CERC ESMF, in accordance with the ESSs.  b) Adopt any environmental and social (E&S) instruments which may be required for activities under the CERC component, in accordance with the CERC Manual and its Emergency Action Plan, and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.	a) The adoption of the CERC-ESMP and, if applicable, other instruments, in form and substance acceptable to the Association is a withdrawal condition under Section III.B.1(b) of Schedule 2 of the Financing Agreement.  b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the emergency activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout implementation of the emergency activities.	The authority designated in the CERC Manual or its Emergency Action Plan for the implementation of the CERC
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b> Adopt and implement the LMP for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	LMP was adopted on December 16, 2022 and shall be implemented throughout Project implementation.	Both PIUs (MENT and MSAS)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	Both PIUs (MCTEN and MSAS) Suppliers and/or service providers and their contractors/ subcontractors
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Adopt and implement any measures/Waste Management Plan (WMP), required by the specific ESMP to be prepared under action 1.2 above, to manage hazardous and non-hazardous wastes (e-waste included), consistent with ESS3.</p>	Adopt the WMP prior to commencing project activities, and thereafter implement the WMP throughout Project implementation.	Both PIUs (MCTEN and MSAS) Suppliers and/or service providers
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMPs.</p>	Same timeframe as for the adoption and implementation of the ESMP	Both PIUs (MCTEN and MSAS)
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Incorporate in the ESMP measures on traffic management arising from Project activities and road safety on and around the Project activity sites.</p>	Same timeframe as for the adoption and implementation of the ESMP.	Both PIUs (MCTEN and MSAS)
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, e.g., behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMP.</p>	Same timeframe as for the adoption and implementation of the ESMP.	Both PIUs (MCTEN and MSAS)
4.3	<p><b>SEA AND SH RISKS</b></p> <p>Adopt and implement a SEA/SH Action Plan as part of the ESMP, to assess and manage the risks of SEA and SH (including cyber related harassment, as appropriate).</p>	Same timeline as the preparation of the ESMP and thereafter implement the SEA/SH Action Plan throughout Project implementation.	Both PIUs (MCTEN and MSAS) Suppliers, workers and/or service providers
4.4	<p><b>SECURITY MANAGEMENT</b></p> <p>The use of security personnel is not contemplated for this project. However, if the need is determined by site-specific risk assessments, mitigation measures will be proposed in accordance with the provisions of ESS 4.</p> <p>In this case, the ESCP will be amended and redisclosed to reflect the requirements and responsibilities for the use of security personnel on specific project sites.</p> <p>Where applicable, the Recipient will be required to develop, adopt and implement a security management plan in accordance with the requirements of ESS 4, and acceptable to the Association.</p>	Prior to engaging security personnel and thereafter implemented throughout Project implementation.	Both PIUs (MCTEN and MSAS)
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT PLANS</b></p>	Before taking possession of the land and related assets.	Both PIUs (MCTEN and MSAS)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Adopt and implement a Resettlement Action Plan (RAP) for each activity under the Project for which requires such RAP, and consistent with ESS5 and ESS10, including ensuring that before taking possession of the land and related assets, full compensation has been provided and that displaced people have been resettled and moving allowances have been provided.		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> Adopt and implement measures to avoid adverse impacts on local biodiversity and living natural resources through the application of a mitigation hierarchy and by optimizing the Project’s technical designs in this regard to the extent feasible, with specific measures to be outlined in the ESMP, and consistent with ESS6.	Same timeframe as for the adoption and implementation of the ESMP, throughout Project implementation.	Both PIUs (MCTEN and MSAS)
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES (NOT RELEVANT)</b>			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b> Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the site-specific ESMP, in accordance with the guidelines of the IEA prepared for the Project, and consistent with ESS8.	Same timeframe as for the adoption and implementation of the ESMP, and thereafter implement the CHMP throughout Project implementation.	Both PIUs (MCTEN and MSAS)
8.2	<b>CHANCE FINDS</b> Describe and implement the chance finds procedures as part of the ESMP of the Project.	Same timeframe as for the adoption of the ESMP. Implement the procedures throughout Project implementation.	Both PIUs (MCTEN and MSAS)
<b>ESS 9: FINANCIAL INTERMEDIARIES (NOT RELEVANT)</b>			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	SEP was adopted on November 22, 2022 and shall be implemented throughout Project implementation.	Both PIUs (MECTN and MSAS)
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.	Establish the grievance mechanism no later than six months following Effective Date of the Financing Agreement, and thereafter maintain and operate the mechanism throughout Project implementation.	Both PIUs (MCTEN and MSAS)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.		
<b>CAPACITY SUPPORT</b>			
CS1	<p>Training as needed for both PIUs' staff, stakeholders, communities, and Project workers (as listed below) on:</p> <ul style="list-style-type: none"> <li>- ESF and Project E&amp;S instruments;</li> <li>- Stakeholder mapping, analysis and engagement; Cyber security, data protection and privacy;</li> <li>- Activity-specific E&amp;S screening;</li> <li>- Specific aspects of E&amp;S, Occupational and Community Health and Safety;</li> <li>- Grievance mechanism, including a mechanism for submission of complaints related to SEA/SH;</li> <li>- Hygiene, health and environment, compliance with codes of conduct, etc.</li> <li>- Monitoring and reporting on E&amp;S due diligence;</li> <li>- Covid-19 mitigation Prevention and Control Recommendations;</li> <li>- Incident reporting and understanding of ESIRT provisions.</li> </ul> <p>With the participation from:</p> <ul style="list-style-type: none"> <li>- <i>Staff and technical team of the PIU, in particular the team in charge of E&amp;S safeguards</i></li> <li>- <i>Representatives of the local authorities concerned</i></li> <li>- <i>Representatives of decentralized technical services involved in the implementation of the Project</i></li> <li>- <i>Suppliers and service providers and NGOs</i></li> <li>- <i>Project workers</i></li> </ul>	Starting three months after the Effective Date of the Financing Agreement.	Both PIUs (MCTEN and MSAS), With support from the Association
CS2	<p>Awareness/information sessions to be organized on:</p> <ul style="list-style-type: none"> <li>- Identification and engagement of stakeholders;</li> <li>- Specific aspects of E&amp;S assessment;</li> <li>- Content and implementation of the Grievance Mechanism (procedures for registering and handling complaints; use of the procedure for the different actors; etc.);</li> <li>- Communication and awareness;</li> <li>- Health and safety, EAS/HS; forced labor, waste management (standard, liquid, hazardous, e-waste, etc.);</li> </ul>	Starting three months after the Effective Date of the Financing Agreement.	Both PIUs (MCTEN and MSAS) With support from the Association