

Environmental and Social Action Plan (ESAP)

This annex presents the Environmental and Social Action Plan (ESAP) proposed to help improve alignment of the Project with the Applicable Standards.

The ESAP includes actions related to ongoing or further E&S studies, to improve the robustness of impact assessment and mitigation studies, as well as certain actions to accompany the Project development and execution through management oversight, stakeholder engagement, etc.

Timelines or head-times are expressed as milestones to the project development phases (e.g. prior to construction start and prior to dam filling) and financial deadlines (e.g. prior to signature and prior to financial close)¹. The timeline takes into account lenders' requirements and ERM's view of the time required to execute the action (i.e. whether the action can be executed rapidly with existing resources, or requires a longer duration given the status of the project and resources).

This ESAP is the final version following several revisions since the initial ESAP issued in March 2020. This final version follows the previous one issued in July 2021 which took into account: (i) the progress and first results of additional studies mainly related to RAP/LRP, biodiversity and E-Flow release, conducted by AECOM, the OMVG's Owner Engineer, following ToRs edited by ERM in May 2020, and (ii) progress made up to July 2021 based on available documentation and discussions between ERM and Project's stakeholders (OMVG, AECOM, SAMVA, CACIB, DBSA). The July 2021 version was updated in November 2021 following lenders comments, then in December 2021 and January 2022 following OMVG and SAMVA comments, which led to the final ESAP (v 4.7), presented below.

¹ Of note, when used in this ESAP, "prior to signature" means condition precedent to the signature of credit agreement and "prior to Financial Close" means condition precedent to first disbursement.

Table 1: Final ESAP

Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
Equator Principles 4 – Principle 7: Independent Review						
1	Environmental and Social Action Plan	<p>The Environmental and Social Action Plan (ESAP) is intended to outline gaps and commitments to meet the Financial Parties' environmental and social requirements in line with the Applicable Standards. The ESAP was not agreed by all parties prior to signature as initially planned.</p> <p>The hereby ESAP is a revised version dated 12 January 2022. The amendments made in January 2022 consisted in addressing OMVG and SAMVA comments on the December 2021 revised ESAP.</p>	Critical	All the relevant parties to the loan agreement and ESAP implementation	Prior to financial close	Final form of the ESAP, signed off by all parties
Performance Standard 1 – Assessment and Management of Environmental and Social Risks and Impacts						
2	Project-wide E&S Management system (ESMS) and Policy	<p>Develop a Project-wide ESMS (with OMVG as owner and entity responsible for implementation), including: all plans and procedures related to the identification and management of E&S risks and impacts; and roles and responsibilities for all associated parties.</p> <p>OMVG, as overall Sponsor and owner of the Sambangalou hydropower scheme, must ensure completion of the Project-wide ESMS for overall E&S management during construction and operations phases, including the development of additional plans, procedures and studies that are needed on various E&S aspects, as well as implementation. Documents remaining to be developed and/or finalized at present include the following, which have been grouped according to the associated timelines:</p> <p>Group A</p> <ul style="list-style-type: none"> Stakeholder Engagement Plan for the entire Project (SEP-Project), including a grievance mechanism Biodiversity Management Plan for the construction of the Sambangalou Hydroelectric Development Project (SHDP) (BMP-C) 	High	OMVG (SAMVA may support for effectiveness)	<p>Prior to the earliest of construction related-activities (including clearing and, excavation) start or signature for group A</p> <p>Prior to the earliest of construction start and financial close for group B¹</p> <p>Prior to reservoir filling or any activity within the area to be flooded for group C</p>	Draft and final versions of ESMS documentation, including but not limited to each document listed

¹ The draft version of the RAP-Upstream must be provided as per the timeline established for Group B. As the document must then be validated with external stakeholders, the final version should be completed in accordance with the timeline established for Group C.

	<p>Group B</p> <ul style="list-style-type: none"> • Community Health & Safety Plan • Local Recruitment Plan for the construction phase (to be adapted to the operations phase prior to the end of construction activities) • Local Procurement Plan for the construction phase (to be adapted to the operations phase prior to the end of construction activities) • Influx Management Plan for the construction phase (to be adapted to the operations phase prior to the end of construction activities) • Updated Security and Human Rights Policy (to include a commitment to the Voluntary Principles) • Water Resources and Wastewater Management Plan for the construction phase • Gender Assessment Report, including a Gender Mainstreaming Action Plan • Permit register and compliance matrix detailing all required permits and arrangements (including those associated with ancillary construction activities) • ESHS staffing plan and organigram • Livelihood Restoration Plan - Construction • Resettlement Action Plan - Upstream (including the reservoir area)² <p>Group C</p> <ul style="list-style-type: none"> • Biodiversity Action Plan (BAP) for Western Africa Chimpanzees (PAB – Chimpanzees) • Biodiversity Management Plan during the filling and operation of the SHPD (BMP-F&O) <p>Group D</p> <ul style="list-style-type: none"> • Other BAPs including without limitation the PNKK BAP, and any other BAP deemed necessary after revision of BMPs • Livelihood Restoration Plan - Downstream <p>The ESMS shall be maintained and updated regularly as the Project progresses.</p>		<p>Prior to operation for group D</p>	
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² The draft version of the RAP-Upstream must be provided as per the timeline established for Group B. As the document must then be validated with external stakeholders, the final version should be completed in accordance with the timeline established for Group C.

Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
3	Construction ESMP	Finalize and put in place the ESMP-Construction, ensuring adequate resources are in place for effective implementation and monitoring of all associated procedures	High	SAMVA	Prior to the earliest of construction start and financial close	ESMP-Construction
4	Construction ESMS	<p>Complete the Construction ESMS to ensure a framework is in place for SAMVA to implement the Project's E&S management commitments (see above) during the construction phase. The Construction ESMS should reflect the structure of OMVG's Project-wide ESMS (above). Remaining gaps in the Construction ESMS include the preparation, revision and finalization of the following at a minimum:</p> <ul style="list-style-type: none"> Stakeholder Engagement Plan for construction (SEP-Construction), including a grievance mechanism Community Health & Safety Plan Local Recruitment Plan Local Procurement Plan Influx Management Plan 	High	SAMVA	Prior to the earliest of construction start and financial close, then to be maintained & updated regularly	Draft and final versions of ESMS documentation, including but not limited to each document listed
5	Environmental flows	<p>A detailed environmental flow assessment is currently being carried out in order to develop an Adaptive Environmental Flow Release (EFR) Strategy for the project. Key steps will include:</p> <ul style="list-style-type: none"> Finalisation of the downstream studies (cuvettes, salinity front, livelihoods) to define optimal downstream flow requirements from ecological/socio-economic perspective, both dry and wet season; Workshop between study team (hydrology, ecology and social specialists) and dam design engineers to optimise Environmental Flow Release (EFR) regime for the Project to address above requirements and meet power generation needs; Adoption of an adaptive EFR regime for the scheme, that includes the long-term commitment to collecting ecological and hydrological (flow/water quality) data at key locations downstream of the dam during construction and operation, and the subsequent refinement of the EFR regime in response to changes observed, e.g. for key indicator species. <p>The final EFR strategy shall be integrated within project design prior to dam construction, including pre-construction activities such as clearing and excavation.</p> <p>The ESMP needs to set out a detailed process and timetable for the integration of the results of this assessment into the project design. To this end, the interim results of the final AECOM environmental flow study (AECOM, August 2021) shall be assessed by the project design team as a priority in order to guide the EFR optimisation process going forwards.</p>	High	OMVG (SAMVA should support for consistency of Project design & subsequent operation)	Integration of final EFR strategy within project design prior to commencement of dam filling	<p>E-flow optimisation workshop minutes and updated plan of action for AECOM study integration</p> <p>Documented adaptive EFR regime, including associated monitoring program and implementation procedures</p>

Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
6	Environmental flows	Commitment to implement the optimal EFR strategy (which appropriately balances E&S and energy) prior to signature.	High	OMVG	Prior to signature	Letter of commitment signed by the OMVG to implement the optimal EFR strategy (which appropriately balances E&S and energy)
7	O&M of the dam facilities	Appoint a reputable international company for the operation and maintenance of the dam facilities in line with the environmental flow regime strategy	High	OMVG / SOGESART	Prior to the commencement of reservoir filling	Request for Proposals for the operation and maintenance of the dam facilities Contract agreement between the OMVG/ SOGESART and the selected company for the operation and maintenance of the dam facilities
8	Organisational capacity (E&S)	<p>Identify resourcing needs and develop a resourcing plan. Recruit and train resources for E&S management and monitoring, both in the study and execution phase of the Project, to ensure effective implementation of E&S commitments by the Project in line with Applicable Standards.</p> <p>Definition of resources needed shall be based on a specific review of OMVG and SAMVA's organisational capacity and ability to manage development and implementation of the ESMS throughout the construction and operations phases.</p> <p>In particular, but without limitation, ensure that the contractors recruit Environment, Social, Occupational Health & Safety specialists as necessary during construction and operation to undertake day to day management and monitoring of the Project.</p> <p>The Operational Team from the Sponsor to include a Biodiversity Specialist to Operational BMP.</p>	High	OMVG (SAMVA may support for effectiveness)	Prior to the earliest of construction start and financial close, except for the personnel relevant to operations phase for which the action is due prior to commissioning	<p>Job descriptions for key roles</p> <p>Evidence of recruitment and training of E&S personnel for construction phase</p>

Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
9	Organisational capacity (e-flow)	<p>Establish an AEFS Technical Unit within OMVG/SOGESART to oversee e-flow strategy, that will maintain communication/interaction with all major stakeholder groups upstream and downstream, including those representing communities and biodiversity conservation interests, and importantly including those within Gambia.</p> <p>OMVG, Permanent Water Commission (CPE) and SOGESART shall be sufficiently equipped to implement the relevant ESAP items, including the BAP, SEP, RAP and LRPs.</p> <p>OMVG/CPE/SOGESART to set up the AEFS Technical Unit and appoint specialized technical resources to work within the AEFS Technical Unit, as deemed necessary.</p>	High	OMVG	<p>Institutional framework defined prior to financial close</p> <p>CPE, SOGESART and AEFS Technical Unit established prior to commencement of dam filling</p>	<p>Draft and final framework Document for establishment and operation of the CPE, SOGESART and AEFS Technical Unit.</p>
10	Biodiversity risk management	<p>Integrate the e-flow strategy/regime developed for the project (see above) within the management plans for downstream protected areas, including updating the PNNK management plan for the period 2019-2023 (PNNK, 2018). Measures to be considered/developed should also include enhancing the hydraulic connectivity between river and cuvettes and introducing flow controls, monitoring and mitigating impacts on mangrove habitats, livelihoods, etc. Key steps should include at a minimum:</p> <ul style="list-style-type: none"> • Identification of stakeholders in key protected areas (with contact information), utilising basin committee as discussed above; • Formal workshops/meetings to discuss/agree suitable management approaches and financing options; • Dissemination of finalised EFR regime/strategy (as above) to stakeholders and ongoing engagement to ensure clarity; • Subsequent monitoring of implementation of measures. 	High	Protected areas authorities including PNNK with the support of OMVG and SAMVA	Prior to commencement of dam filing	<p>Stakeholder mapping and contacts</p> <p>EFR mitigation workshops minutes and amendment of the plan of action for biodiversity management</p>
11	Management of downstream impacts	<p>Design and implement an effective livelihood restoration program to ensure management of impacts and capture/enhance of benefits of the regulated river for downstream communities that use the river/wetlands (see more under PS5). This process should include extensive consultation with potentially affected communities, other local stakeholders, and potential partners to support the design and implementation of livelihood restoration program. Ensure qualified personnel are in place for implementation.</p>	Moderate	OMVG	Prior to start of operations	<p>Draft and final versions of a downstream Livelihood Restoration Plan</p> <p>Evidence of recruitment of required personnel for the implementation of the livelihood restoration program downstream</p>

Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
12	Stakeholder Engagement (planning)	<p>Develop and implement a Project-wide SEP (SEP-Project) incorporating the SEP prepared by AECOM for its three studies and aligning with the SEP-Construction to be prepared by SAMVA for construction activities.</p> <p>The Project-wide SEP (SEP-Project) should include at a minimum:</p> <ul style="list-style-type: none"> - A stakeholder map and analysis (i.e. identification of all stakeholders relevant to the Project and an assessment of their level of interest, influence, and sensitivity to the Project); - A stakeholder engagement strategy, including: <ul style="list-style-type: none"> o Specific objectives for engagement; o Methodology, ensuring appropriate mechanisms are used for separate stakeholder groups; o Definition of a Project-wide grievance mechanism and a related dissemination plan; o Data management protocols to record and track documentation of engagement activities, agreements, commitments, emerging issues, etc. o Implementation plan, including a budget, schedule and resources; and o Monitoring procedure, including documentation of engagement activities and internal reporting to track any emerging issues and provide feedback to lenders. - A process for feeding back information collected from stakeholders into the E&S risks and impacts identification process, and E&S management procedures. 	High	OMVG (with input from SAMVA and AECOM)	Prior to the earliest of the start of construction related-activities or signature	<p>Draft and final versions of the SEP-Project</p> <p>Engagement documentation (Meeting minutes, commitment registers, etc.)</p>
13	Stakeholder Engagement (implementation)	<p>Implement the SEP-Project and SEP-Construction, ensuring early and effective engagement that allows the Project to identify and respond to stakeholder issues and concerns, including through use of the Project-wide grievance mechanism.</p> <p>The Project should regularly report on engagement activities and the grievance mechanism should be made accessible to the affected parties.</p>	High	OMVG and SAMVA	Prior to the start of construction activities	Engagement reports and supporting documentation
14	E&S Monitoring - Construction	<p>During construction, the ESHS Manager of the OMVG's Engineer will monitor the ESHS obligations and practices of the EPC contractors and any sub-contractors, as relevant.</p> <p>Monthly Construction E&S Monitoring reports to be provided to the Financial Parties, including without limitations:</p> <ul style="list-style-type: none"> - Adherence to the Construction ESMS - Project-wide ESMS - Stakeholder engagement activities - Recruitment and any issues related to the HR policy - Any incidents related to community health and safety - Any feedback on the dam breach flood warning system - Any security incidents and the management measures - RAP/LRP development and implementation during construction - Any chance finds related to cultural heritage or sacred sites - Note of presence / actions taken to remedy presence of invasive species (construction and project- 	High	OMVG and its Owner Engineer (with input from SAMVA)	During construction	<p>Monthly E&S reports</p> <p>Quarterly reports to OMVG</p>

		wide) - Any incidents related to biodiversity particularly the chimpanzees - Water consumption				
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Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
15	E&S Monitoring - Operations	During operations, the ESHS Manager of OMVG will monitor the ESHS obligations and practices of the EPC and O&M contractors and any sub-contractors, as relevant.		OMVG (with input from the O&M contractor)	During operations	Monthly E&S reports during the first year of operations, then – at least – quarterly E&S reports
16	E&S Monitoring	<p>Considering significant E&S challenges the Project is facing both from a technical and organizational standpoint, the support of an independent consultant is highly recommended to ensure appropriate identification and implementation of E&S measures and actions to reach compliance with IFC PS throughout the Project life.</p> <p>MEPC and/ or OMVG shall appoint and retain an Independent Environmental and Social Consultant (IESC) to independently monitor and report to Lenders on the implementation of this ESAP and Lenders' E&S standards and requirements during the Project construction and operation phases.² Quarterly reporting will be required during construction; semi-annual reporting will be required during operations.</p>	High	MEPC and/or OMVG	<p>IESC to be appointed prior to the earliest of the start of construction and financial close</p> <p>Ongoing reporting during construction and operations</p>	<p>Engagement Letter signed with the appointed IESC</p> <p>Quarterly reporting during construction</p> <p>Semi-annual reporting during operation</p>
Performance Standard 2 – Labour and Working Conditions						
17	HR policy, including local recruitment	<p>The Project has developed a Human Resource Policy and Local Recruitment Plan. Documents note conflicting information on the number of jobs to be created, ranging from 800 to 3000.</p> <p>With the support of OMVG, SAMVA must immediately confirm its workforce needs (including subcontractors). Information on the type, number and timeline of positions to be created should be shared with external stakeholders in order to manage expectations.</p>	Moderate	SAMVA (with coordination from OMVG)	Prior to the earliest of construction start and financial close	Confirmation of workforce needs
18	HR policy, including local recruitment	The Local Recruitment Plan should be reviewed to ensure the process is accessible and equitable, and then validated with key stakeholders. In accordance with the Project schedule, the recruitment procedure should be widely disseminated.	Moderate	SAMVA (with coordination from OMVG)	Prior to the earliest of construction start and financial close	Local Recruitment Plan
19	HR policy, including local recruitment	A Local Procurement Plan should be developed and communicated broadly to optimize opportunities for local suppliers.	Moderate	SAMVA (with coordination from OMVG)	Prior to the earliest of construction start and financial close	Local Procurement Plan
20	Occupational health & safety management	The Project has developed a Health and Safety Plan identifying workplace risks and mitigation requirements. The Plan should be updated to reflect current staffing. SAMVA should ensure personnel are in place to enable effective implementation and monitoring.	Moderate	SAMVA	Prioritizing early works activities that are already ongoing at the site, the rest	Final versions of the OHS Management Plan for construction

² The scope and details of this E&S Monitoring assignment were further described in draft ToRs prepared by ERM and shared with CA-CIB representatives in September 2020. These are not presented in Annex of the report as no final version was validated but can be consulted in draft form for information.

Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
	for construction				prior to final notice to proceed to construction	
21	Gender	To ensure a gender perspective is applied throughout the Project, a gender assessment should be carried out by a qualified third party. The assessment should include a review of Project documentation and consultation with relevant internal and external stakeholders (as appropriate) to determine the extent to which gender has been considered and incorporated in the design of the Project's E&S policies, plans, and procedures. This should include a review of the Project's identification of risks related to gender-based violence and the effectiveness of proposed mitigation measures. The assessment should also include preparation of a Gender Mainstreaming Action Plan to address any gaps or issues identified through the assessment and ensure gender is mainstreamed within the Project's ESMS. The Action Plan should specify clear with activities, timelines, budget, and responsible parties for implementation.	High	OMVG (with support from SAMVA)	Prior to the earliest of start of construction and financial close	TORs for gender mainstreaming assessment Draft and final versions of the Gender Mainstreaming Assessment Report, including a Gender Mainstreaming Action Plan
Performance Standard 3 – Resource Efficiency and Pollution Prevention						
22	Water quality impacts	Mitigation to be extended to include both in-reservoir and downstream water quality monitoring and an adaptive management approach to enable adjustments to operational practices (e.g. release patterns, inlet mixing, etc.) should significant WQ impacts occur during operation.	Moderate	OMVG and its Owner Engineer	Prior to start of dam construction	Draft and final water quality management procedure
23	Resource efficiency – water consumption	Undertake analysis of water volumes to be abstracted during the construction phase and develop/monitor appropriate water use efficiency/saving measures within the ESMP. Also, incorporate process of periodic climate risk assessment updates for the project in accordance with IFC guidelines and standards.	Moderate	SAMVA	Prior to start of dam construction	Draft and final construction water management plan
24a	Climate change	Undertake an analysis of climate change and adaptation risks and impacts (including GHG emissions), and where necessary, incorporate identified mitigation or efficiency measures within the Project's ESMS. Such analysis shall include without limitations: <ul style="list-style-type: none"> Direct comparison between the estimated GHG emissions generated by the project and the annual 25 000tCO₂eq threshold captured within IFC PS3. Details of energy saving measures in the detailed design and in the choice of construction techniques. Periodic climate risk assessment updates shall be performed for the project in form and content acceptable to the Applicable Standards.	Moderate	OMVG (SAMVA may support for effectiveness)	Prior to the earliest of construction start and financial closing	Draft and final climate change risk assessment and adaptation strategy ToR for periodic climate risk assessment updates
24b	Climate change	As described earlier under PS1, finalise ongoing analysis of climate change and adaptation risks and impacts (including GHG emissions), and where necessary, incorporate identified mitigation or efficiency measures within the Project's ESMS and/or Project Design. Calculate	Moderate	OMVG (SAMVA may support for	Climate change study to be finalised and results integrated within Project	Draft and final climate change risk assessment

		the life-cycle GHG emissions per kWh (e.g. G-res tool) for the project.		effectiveness)	Design (as appropriate) prior to construction start	and adaptation strategy
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Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
25	Pollution Prevention - Erosion and sedimentation	<p>(i) The project company will require the EPC contractor to develop and implement a detailed Dust, Air Pollution and Noise Emission Management Plan.</p> <p>(ii) The project company will ensure that the EPC contractor develops and implements an Earthwork and Erosion Management Plan for the construction phase</p> <p>(iii) OMVG to ensure the O&M Contractor develops and implements a sediment management strategy for the operational phase</p> <p>(iv) Development and implementation of Hazardous Materials Management Plan incorporating pesticide management</p>	Moderate	<p>OMVG & SAMVA for (i), (ii) and (iv)</p> <p>OMVG & O&M (iii)</p> <p>OMVG & SAMVA (iv)</p>	<p>Prior to the start of construction activities for (i), (ii) and (iv)</p> <p>Prior to commissioning for (iii)</p>	<p>Dust, Air Pollution and Noise Emission Management Plan for construction phase.</p> <p>Earthwork and Erosion Management Plan for the construction phase developed and ready for implementation</p> <p>Sediment management strategy for the operational phase developed and implemented</p> <p>Hazardous Materials Management Plan incorporating pesticide management in place</p>
26	Dry season turbine shutdown incidents	Ensure that a socio-environmental operating procedure is included within the adaptive environmental flow strategy to cover any total shutdown incidents occurring in the dry season.(these issues are addressed in AECOM report reviewed in November 2021)	Moderate	OMVG & O&M	Prior to dam filling	Socio- environmental operating procedure to cover any turbine shutdown incidents occurring in the dry season

Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
Performance Standard 4 – Community Health, Safety and Security						
27	Community Health and Safety risks	<p>Develop a Community Health and Safety Plan and disseminate it across the Project Area. The Plan should include at a minimum:</p> <ul style="list-style-type: none"> • Identification of risks to community health and safety at all stages of the Project and most urgently, during construction; • Mitigation and management measures for identified risks, to be validated with relevant external stakeholders to ensure appropriateness and support from relevant partners (e.g. government authorities to disseminate information, local fire or health services, etc.); • Implementation plan, defining the budget, resources and calendar for mitigation and management measures; • Monitoring and reporting plan, to be agreed upon with local stakeholders to ensure information meets their needs/priorities, and to include external reporting to lenders and ECAs. 	Moderate	SAMVA	Prior to the earliest of the start of construction and financial close	Draft and final versions of the Community H&S Plan
28	Community Health and Safety risks	Prepare an Influx Management Plan to mitigate the impacts of project-induced in-migration on host communities.	Moderate	SAMVA	Prior to the earliest of the start of construction and financial close	Draft and final versions of the Influx Management Plan
29	Dam breach response	<p>Develop a dam breach flood warning system and response procedure, as part of a Community Health and Safety Plan, and disseminate information particularly to downstream communities. Development of the procedure should involve:</p> <ul style="list-style-type: none"> • Internal consultation between OMVG, SAMVA and other relevant actors to ensure the Project has a comprehensive understanding of dam breach flood risks; • External consultation with relevant government agencies to ensure alignment with national procedures and utilization of available resourcing and communication/evacuation systems; • Input from community stakeholders to ensure the system is locally-appropriate and will be effective in case of a dam breach; and • Consideration for management of breach impacts in the near, medium and long terms, including all possible social and environmental impacts. <p>Once the system and response procedure are finalized, they should be periodically reviewed internally to ensure they remain up to date. Messaging on the system and procedure should be incorporated into the Project's stakeholder engagement activities so that local residents remain aware and informed. Any feedback on the system should be recorded in engagement documentation.</p>	Moderate	SAMVA/OMVG	Prior to dam commissioning	Draft and final version of the dam breach flood water system and response procedure
30	Dam operation during floods	<p>Develop clear dam operating procedures and downstream flood warning/communication protocols under extreme flood conditions, including flow release procedure to mitigation water level rise in reservoir and downstream community warning of imminent water level rises.</p> <p>Train dam operators accordingly.</p>	Moderate	SAMVA/OMVG	Prior to dam commissioning	Draft and final dam flood communication procedure

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31	Human rights and security	<p>Conduct a review of the Project's security risks, including those related to interactions with state security forces. On that basis, develop a security policy for the Project that:</p> <ul style="list-style-type: none"> Aligns with the Voluntary Principles on Security and Human Rights, including a clear policy on the use of force; Commits to the provision of training to any security forces engaged by the Project; Establishes clear procedure to ensure awareness of and adherence to the policy by all employees and contractors; Establishes a procedure for reporting and managing any security incidents, including reporting to relevant government authorities. <p>Develop a Security Policy addressing human rights and the use of force or update existing Policy on Human Resources and Security.</p>	Moderate	SAMVA	Prior to the earliest of the start of construction and financial close	<p>Draft and final version of the Security Policy</p> <p>Evidence of training of commanding staff of security forces on Project security policy</p>
32	Human rights and security	Engage with security forces in charge of Project security & law enforcement on Project security policy, including awareness of Voluntary Principles on Security and Human Rights, process for arresting and dealing with trespassers, process for community& project communication in the event of civil unrest.	Moderate	SAMVA	Prior to the earliest of the start of construction and financial close	Evidence of engagement with security forces
Performance Standard 5 – Land Acquisition and Involuntary Resettlement						
33	Physical and economic displacement, RAP-Upstream	<p>In line with the commitments made in the Resettlement Framework, proceed with preparation a RAP for upstream impacts including, at a minimum the following sections:</p> <ul style="list-style-type: none"> Introduction – overview of Project context, location, etc. Legal & Institutional Framework – outline of relevant national regulations and Applicable Standards; Baseline Conditions – detailed description of socio-economic context prior to displacement; Scope of Displacement - identification of expected project impacts and affected households and communities; Engagement – map of stakeholders relevant to the resettlement process, definition of engagement objectives, establishment of engagement and negotiation mechanisms – including specifications on community liaison offices / officers, and documentation and reporting procedures for engagement activities; Eligibility and Entitlement Policies – policies defining who will be eligible and for what based on the type and level of impacts, to be developed based on consultation with affected households; Compensation Measures – description of compensation, replacement assets, and other entitlements that will be provided to eligible households, including methodology for how compensation will be calculated and a procedure for how/when replacement assets will be delivered; Livelihood Restoration Measures – description of the programs that will be put in place to support households in restoring their livelihoods following displacement, including identification of partners and developed in accordance with the findings of the Basin 	High	OMVG	<p>Draft version of the RAP-Upstream to be provided prior to the earliest of the start of construction or financial close</p> <p>Final version of the RAP-Upstream to be provided prior to reservoir filling or any activity within the area to be flooded</p>	Draft and final versions of the RAP-Upstream

	<p>Studies and E-Flow Strategy;</p> <ul style="list-style-type: none"> • Vulnerable Support Measures – criteria to identify households particularly vulnerable to displacement impacts and description of measures to be put in place to enable them to fully access resettlement benefits; • Grievance Mechanism – description of the grievance management procedure that will be put in place to receive and resolve complaints or issues related to the resettlement process; • Monitoring & Evaluation – procedure for ongoing monitoring of the resettlement program and periodic evaluation to ensure resettlement commitments and objectives are met; • Organizational Framework – resourcing plan clearly stating roles and responsibility for resettlement planning and implementation; and • Schedule & Cost Estimate – detailed budget and timeline for implementation. 				
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Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
34	Economic displacement, LRP-Downstream	<p>In line with the commitments made in the Resettlement Framework, proceed with preparation a LRP for downstream impacts including, at a minimum the following sections:</p> <ul style="list-style-type: none"> • Introduction – overview of Project context, location, etc. • Legal & Institutional Framework – outline of relevant national regulations and Applicable Standards; • Baseline Conditions – detailed description of socio-economic context prior to displacement; • Scope of Displacement - identification of expected project impacts and affected households and communities; • Engagement – map of stakeholders relevant to the livelihood restoration process, definition of engagement objectives, establishment of engagement and negotiation mechanisms - including specifications on community liaison offices / officers, and documentation and reporting procedures for engagement activities; • Eligibility and Entitlement Policies – policies defining who will be eligible and for what based on the type and level of impacts, to be developed based on consultation with affected households; • Compensation Measures – description of compensation, replacement assets, and other entitlements that will be provided to eligible households, including methodology for how compensation will be calculated and a procedure for how/when replacement assets will be delivered; • Livelihood Restoration Measures – description of the programs that will be put in place to support households in restoring their livelihoods following displacement, including identification of partners and developed in accordance with the findings of the Basin Studies and E-Flow Strategy; • Vulnerable Support Measures – criteria to identify households particularly vulnerable to displacement impacts and description of measures to be put in place to enable them to fully access benefits; • Grievance Mechanism – description of the grievance management procedure that will be put in place to receive and resolve complaints or issues related to the livelihood restoration process; • Monitoring & Evaluation – procedure for ongoing monitoring of the livelihood restoration program and periodic evaluation to ensure commitments and objectives are met; • Organizational Framework – resourcing plan clearly stating roles and responsibility for livelihood restoration planning and implementation; and • Schedule & Cost Estimate – detailed budget and timeline for implementation. 	High	OMVG	Prior to start of operations	Draft and final versions of the LRP-Downstream
35	Economic displacement, LRP-Construction	The LRP-Construction should be reviewed to ensure all displacement impacts have been captured and appropriate mitigation and compensation measures are in place. As noted therein, the LRP should then be validated with external stakeholders and finalized.	High	OMVG	Prior to the earliest of the start of construction or financial close	Final version of the LRP-Construction

36	Organisational Capacity	Ensure qualified personnel and adequate resources are in place to ensure effective implementation of all resettlement and livelihood restoration plans and avoid potential delays to the Project schedule. Detailed resourcing plans to be included in the RAP and LRPs; additional personnel / resources to be retained by OMVG as required.	High	OMVG	<p>Final version of the LRP-Construction prior to the earliest of the start of construction or financial close</p> <p>Final version of the RAP-Upstream prior to reservoir filling or any activity within the area to be flooded</p> <p>Final version of the LRP-Downstream prior to the start of operations</p> <p>Additional personnel / resources to be retained prior to implementation of the RAP and LRPs (as needed)</p>	<p>Final versions of the LRP-Construction, RAP-Upstream and LRP-Downstream with roles detailed for implementation</p> <p>Relevant employment / contractor agreements</p>

Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
37	Data collection	As part of the preparation of the RAP for upstream impacts and LRP for downstream impacts, undertake a household survey to confirm scope of displacement and identify the Project-Affected Persons (PAP) who are expected to be physically and/or economically displaced. Ensure surveys include data to inform the updated socio-economic baseline, determine eligibility for resettlement entitlements, identify vulnerable households (as per vulnerability criteria), and allow for monitoring and evaluation of resettlement impacts. Ensure data is entered and maintained in an accessible database to facilitate monitoring and evaluation.	Moderate	OMVG	For RAP-Upstream, prior to the earliest of the start of construction or financial close For LRP-Downstream, prior to start of operations	Completed survey forms for each affected settlement
38	Data collection	Ensure data is entered and maintained in an accessible database to facilitate monitoring and evaluation.	Moderate	OMVG	For RAP-Upstream, prior to the earliest of the start of construction or financial close For LRP-Downstream, prior to start of operations	Resettlement database
39	Cut-off date	Declare a new cut-off date corresponding to the RAP and LRP survey processes, based on consultation with relevant government authorities and according to the national procedure. Disseminate the date and its implications broadly throughout the region to ensure affected households are informed prior to the cut-off date.	Moderate	OMVG	Dissemination of the cut-off date prior to the start of the resettlement survey process	Arrêté (official act) declaring new cut-off date
40	Cut-off date	Ensure adequate measures were taken related to dissemination of the cut-off date for the LRP-Construction and document those steps in an updated version of that document.	Moderate	OMVG/SAMVA	Prior to start of construction activities	Documentation of efforts to disseminate cut-off date (e.g. newspaper ads, notices, etc.) Final version of LRP-Construction
41	Close-out audits	Commission external completion audits of the RAP and LRPs to verify that all commitments have been fulfilled in accordance with PS5 requirements, and if applicable, to recommend measures to address identified gaps.	High	OMVG	Upon completion of implementation of the RAP and LRPs, expected within 5 years of COD	Completion audit report of the RAP-Upstream, LRP-Construction and LRP-Downstream
42	Fish resources management in the reservoir	Develop a fisheries management plan for the reservoir with a set of measures, including: fishery regulation, environment & catch monitoring, training and microfinance (prioritized to PAPs), access and post-harvest infrastructures, reinforcement of local fisheries administrations.	Moderate	OMVG, in coordination with Inland Fishery	As soon as possible, latest one year before start of project operation	Finalised fishery management plan for the reservoir

Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
		A benchmarking approach on existing fisheries management in other reservoirs (Manantali, Garafiri, etc.) is strongly recommended.		services of the two countries		
Performance Standard 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources						
43	Biodiversity Management Plan	<p>Develop biodiversity Plans (BMPs) for construction stage and for reservoir impoundment/operation stage in compliance with the requirements of IFC PS 6 and internationally recognized methodology/best practices, with the following steps (see annex D, ToRs for additional studies on natural environment, biodiversity and ecosystem services, for more details):</p> <p>Perform a review and update of available biodiversity data (Project E&S documentation, diverse biodiversity documentation from PNKK, from the 3 countries (the Gambia, Guinea and Senegal), and from international NGOs or institutions, national or international biodiversity databases, GIS & satellite material, etc.), completed with interviews of key biodiversity stakeholders and IUCN group experts for key species, and illustrated with GIS maps and photo-plates.</p> <p>Collect baseline biodiversity field data on a set of selected stations: (i) along the fluvial and estuarine impact area (5- 10 stations); (ii) at the dam site, in the future reservoir area and surroundings (3-5 stations), with targeted surveys (flora and fauna inventories, key species, remote sensing, other ecological and natural resources indicators). The objective is to compensate the current lack of primary data in ESIA documentation, to establish an ecological baseline for further long-term monitoring (as developed below) and to optimize the adaptive EFR strategy (see EFR related actions). Regarding field inventories, a first survey was undertaken by AECOM in December 2020-January 2021 and a second one, March-April 2021, is ongoing. Details on methodology and first results were edited by AECOM in a Technical note, April 2021 .</p> <p>Screen/identify Critical Habitats and priority ecosystem services; for the whole of the potentially affected areas: future reservoir area and surroundings, Gambia river and estuary, and associated wetlands (banks, cuvettes, mangroves ...), with a focus on PNNK (see following section), other protected areas and recognised areas of ecological interest. (downstream and upstream of the dam site up to where impacts from the project to biodiversity could be reasonably expected). The Project should determine if the Ramsar sites located in the Project’s Area of Influence shall be considered as critical habitats under the IFC PS6. Specific attention will be given to Gambia-Oundou-Liti site, and Bao Bolon Wetland Reserve.</p> <p>Upgrade identification and assessment of impacts on biodiversity and ecosystem services, Specific focus should be placed on Critical Habitats, rare or endangered species, invasive species and priority ecosystem services.</p> <p>Where applicable, the Sponsor will not impact any critical habitat triggering plant species until</p>	High	OMVG (SAMVA may support for effectiveness)	<p>Same timelines as for item 2 (biodiversity related items)</p> <p>Prior to the earliest of construction start or signature for the Biodiversity Management Plan for construction (BMP-C)</p> <p>Prior to reservoir filling for (i) Biodiversity Management Plan for filling and operation of the SHDP (BMP-F&O) (Item 2 Group C).</p> <p>Prior to any activity within the area to be flooded for Biodiversity Action Plan (BAP) for Western Africa chimpanzees and BAP for other critical habitats in the reservoir area, if any</p> <p>Prior to operation for all other BAPs deemed necessary</p>	<p>Finalised BMPs</p> <p>Finalised BAP (s) relevant to each Critical Habitat and relevant Natural habitats affected by the Project</p> <p>Evidence of consensus with third parties for BAP implementation, such as agreements / MoUs</p>

	<p>the feasibility of Net Gains has been demonstrated.</p> <p><u>Define a set of measures for site preparation (including but not limited to clearing and excavation) construction, filling and operation</u>, fulfilling the PS6 requirements and international best practices especially mitigation hierarchy (avoid, minimize, mitigate, compensate) and considering ecosystem connectivity and biodiversity corridors, at a preoperational level (context and justification, objective, implantation steps and technical modalities, schedule, involved stakeholders, efficiency and completion indicators, costs). The BMP will include:</p> <ul style="list-style-type: none"> (i) avoidance/mitigation actions (e.g. specifications for EFR management, wildlife passages, recommendations of the AECOM study on backswamps; (ii) compensation actions against residual impacts on Natural Habitats (“no net loss approach”) and Critical Habitats (“net gain approach”), including if relevant offsets associated with Biodiversity Action Plans (BAPs) In compliance with PS6, BAPs will include offset feasibility studies, practical implementation plans, and identification, consultation/coordination with third parties (using the SEP as specified under IFC PS1) (iii) long term biodiversity monitoring on selected stations with targeted indicators (see above) and detailed methodology (iv) capacity building for key stakeholders (ecological functioning and stakes of the Gambia river system, relevant standards & methodology, implementation of BMPs & BAPs commitments, conservation status distribution and ecology of the West African Chimpanzee, etc.). Note that engagement with all stakeholders, in the upstream and downstream of the catchment areas, who will be involved in biodiversity issues shall be addressed in the SEP (see PS1, “stakeholders management” section) <p>To date, biodiversity additional studies based on ToRs (Annex D) are ongoing with AECOM. The Biodiversity scoping and work plan report and a Biodiversity management plan for construction (BMP-C) was delivered in March 2021. The BMP-C can be considered final (pending refinement after results of second rainy season survey) in which concerns the mitigation and management measures. A Technical note (April 2021) presents the methodology and first results for field surveys. The BMP for filling/impoundment and operation (BMP-F&O) and the Biodiversity action plans for PNNK and for Chimpanzees have been delivered in October 2021 (draft versions). Other PABs might be developed at a later stage following the BMP revision process</p>				
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Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
44	Protection and Conservation of Biodiversity –Chimpanzees	As chimpanzees are present in the Project Area, consult the IUCN/Species Survival Commission (SSC) Primate Specialist Group (PSG) Section on Great Apes (SGA) via its recent and dedicated ARCC Task Force to assist in the determination of the occurrence of great apes in the Project's Area of Influence and to develop a mitigation strategy.	High	OMVG	Prior to signature	Evidence of receipt by IUCN SSC PSG SGA or its recent and dedicated ARCC Task Force of a request for assistance

Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
45	Protection and Conservation of Biodiversity – Chimpanzees	<p>The project must participate in the IFC PS process that must be implemented, which is expected to be like the following (or similar according to ARCC Task Force requirements):</p> <ul style="list-style-type: none"> - The IUCN SSC PSG SGA (and/or its ARCC Task Force) will arrange an initial call with the OMVG to learn more about the Project - The IUCN SSC PSG SGA will do its due diligence. - The IUCN SSC PSG SGA will make a decision whether or not it is able to engage with the Project based on where the Project is located, the scale of its impact and the OMVG's commitment to mitigate impacts. - If the IUCN SSC PSG SGA decides to engage, then it will agree through an MOU to provide feedback to the OMVG on whatever its request might be. - The IUCN SSC PSG SGA, will pull together a panel of experts who read the documents and participate in phone calls with the OMVG to provide any advice needed. - The IUCN SSC PSG SGA will issue a statement summarizing what its engagement is with the Project and a brief statement of its assessment of the Project. 	High	OMVG	Prior to the earliest of start of construction and financial close	<p>Official Statement and MoU signed by a Vice-Chair of IUCN SSC PSG SGA</p> <p>MoMs of meetings</p>
46	Protection and Conservation of Biodiversity – Chimpanzees	<p>Any area where there are great apes is likely to be treated as critical habitat, or at least natural habitat. In those areas of the presence of great apes, a specific BAP needs to be developed, describing the Project's mitigation strategy, designed to achieve damage compensation for chimpanzee population and its habitat</p> <p>The IUCN SSC PSG SGA or ARCC Task Force must be involved in the development of any mitigation strategy (see item 39)</p>	High	OMVG	Prior to impacts in the designated habitat (i.e. any activity within the area to be flooded)	Biodiversity Action Plan for chimpanzees, signed off by the IUCN SSC PSG SGA, or ARCC taskforce,
47	Biodiversity management plan (PNNK section)	<p>Develop a separate section of the BMP for filling and operation dedicated to PNNK issues with compliance to PS6 (see above) and to the World Heritage impact assessment principles (IUCN guidelines, 2013), and the relevant IUCN Advice Note, submitted to the World Heritage Centre, including, as a minimum: ERC measures regarding the PNNK Outstanding Universal Value, (ii) measures to promote and enhance conservation objectives (iii) to update the PNNK Management Plan (2019-2023 (PNNK, 2018) ; (iv) measures to strengthen management resources and (v) long term monitoring measures (see previous section) specific to PNNK; (vi) BAPs if relevant for specific Critical Habitats triggering elements with significant residual impacts from the project after application of all mitigations included in the BMP.</p> <p>The progress of ongoing AECOM biodiversity additional studies is presented at the previous section.</p>	High	OMVG, in close collaboration with PNNK	Prior to start operation, according to specific chronology in the BMP	<p>MoU with PNNK management entity</p> <p>Evidence of working collaboration (minutes of meetings, technical correspondence)</p> <p>Specific section on PNNK biodiversity management in the operation BMP</p>

Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
48	Engagement with UNESCO WHC & PNNK	<p>Beyond developing the BMP, engagement with the UNESCO WHC and/ or PNNK needs to be undertaken IUCN should be closely involved in this engagement.</p> <p>OMVG will provide to the State Party in charge of the PNNK WH Property (Senegalese commission for UNESCO, 4 av Jean Jaures, Dakar) all information required to fulfil items 11 and 13 of the last WHC Decision 44 COM 7A.50 regarding this Property (https://whc.unesco.org/fr/decisions/7712). This information shall enable the State Party, in accordance with item 13, to submit to WHC before Feb 1st 2022, an updated report on the state of conservation and the implementation of item 11 (<i>“submit a specific assessment on the impacts of the dam project at Sambangalou on the Outstanding Universal value of the property before any decision on its construction, in accordance with § 172 of the Operational Guidelines and the IUCN World heritage Advisory Note on environmental assessment”</i>). The information shall include BMP for operation and the BAP for PNNK that serves as impact assessment as required by WHC.</p>	High	OMVG	Prior to the earliest of construction start and financial close.	<p>MoU with PNNK</p> <p>Evidence that OMVG provided the information to the State party or the relevant Advisory Body of the WHC (namely IUCN) in order to enable the State party or the Advisory Body to report to the WHC considering the decisions adopted during the sessions of the World Heritage Committee</p> <p>Evidence of engagement decision (minutes of meetings, technical correspondence)</p> <p>Contract between OMVG and IUCN featuring the role of IUCN in the monitoring of PNNK conservation status in relation to the Project</p>
49	Long-term monitoring in support of adaptive EFR regime	<p>See PS1 for actions relating to the ongoing development of an adaptive Environmental Flow Release (EFR) regime for the project.</p> <p>As part of this adaptive approach, the ESMP needs to include long-term commitment to collecting hydrological (flow/water quality) and ecological data at 5-10 key locations downstream of the dam (including identified key tributaries) during construction and operation, and the subsequent refinement of the EFR regime in response to changes observed, e.g. for key indicator species.</p> <p>This needs to include monitoring of changes in the backswamps and mangrove systems, and the associated livelihoods program (PS1) would need to identify and support the local communities using the natural resources in impacted sections of river, estuary and associated wetlands.</p>	High	OMVG	Prior to start of dam construction and ongoing for the life of the project	Report on baseline conditions prior to construction, and periodic monitoring reports thereafter every 6 months

50	Prevention of invasive species (Construction)	<p>Develop an invasive species management plan, which is already included in the Construction BMP, and also in the BMP for filling and operation. These sections will include:</p> <ul style="list-style-type: none"> • A review of risks of invasive species dissemination as part of construction activities, based on experience from construction activities in similar environment; • A procedure for invasive species prevention as part of construction, including, where relevant, equipment clean-up and verification before site mobilisation; • A procedure for periodic site verification for invasive species, particularly at construction site margins and earthworks/ backfill storage areas. • If invasive species are identified, implement actions to limit their dissemination (e.g. rooting / clearing of specimens identified, identification & removing of cause of dissemination...) <p>These issues have already been addressed in the Construction BMP in what concerns construction</p>	Low	SAMVA	Before start of project construction	Draft and final invasive species management plan.
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Item	Topic	Action	Priority	Responsibility	Timeline for completion	Completion indicator
51	Prevention of invasive species (Operation)	Develop a Project-wide invasive species management plan focussing on risks of introduction / propagation of invasive species as a result of reservoir creation and downstream flow regulation. This should consider typical invasive plant species, floating plant species, as well as other aquatic organisms (fish, etc.).	Moderate	OMVG	1 year in advance	As above
Performance Standard 8 – Cultural Heritage						
52	Chance finds	A Chance Finds Procedure has been prepared that is applicable to all personnel and sub-contractors. Any chance finds must be reported to relevant authorities and be included in monthly E&S reports. SAMVA should identify and provide the CV of a qualified cultural heritage specialist who will be engaged if any risks to or impacts on cultural heritage sites are identified during the construction process.	Low	SAMVA	Prior to the start of construction	Cultural Heritage Specialist CV Chance Find Reports to relevant authorities, as needed

