

FP021 Senegal Integrated Urban Flood Management Project (AFD), Senegal

CSO comments on the project given as intervention during the 14th GCF Board Meeting, October 2016

- This is the first Category A project to be decided by the Board and we have expressed our concern repeatedly that we believe the Board should not consider any funding proposals with high social and environmental risks.
- The sequencing of the proposal seems reversed; the project is the consequence of urban flood drainage measures developed as a construction mitigation effort of a highway building project started in 2006/2007. The focus on the GCF-funded project portion is now the development of a national scale integrated policy for flood management. It would seem that such policy frameworks should be considered *before* major infrastructure projects are carried out. As such, while useful, the project appears to almost be an afterthought.
- Some key pieces of information are clearly out of date. The ESIA and Resettlement Action Plan are from 2013. Many activities organized with communities date back to 2011. Surely, there have been developments since then, in terms of the circumstances of local inhabitants and especially in terms of environmental and social impacts of floods.
- The quality of local stakeholder engagement raises concerns, especially with regard to affected communities. Engagement with project affected people appears to be more geared towards “acceptance of the appropriation time frames and the displacement conditions” (p. 60) rather than actual consultations that include affected people in the decision-making process. We question whether this is in compliance with IFC PS 1 on informed consultation and participation for projects with potentially significant adverse impacts on affected communities.
- We have questions about the quality of resettlement sites (i.e. social/sanitary infrastructure provided). We also seek assurance, via target indicators, that female-headed households/women are adequately considered in resettlement, including through preferential treatment as needed.
- National CSO stakeholders have raised the concern that the focus of the integration flood risk management policy-making is on urban areas only, while flood control is equally important for rural areas.
- The private sector will be involved in building the drainage system, via APIX, a public company in charge of major investment projects in Senegal. We have questions as to whether the project could benefit from more private sector involvement to ensure sustainability after the project ends.