



## LIBERIA ELECTRICITY CORPORATION AND RURAL AND RRENEWABLE ENERGY AGENCY

Liberia Electricity Sector Strengthening and Access Project – Phase 2 (LESSAP-2)

P180498

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

15 May 2024

Draft

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- 1. The Government of Liberia (the Borrower) will implement the Liberia Electricity Sector Strengthening and Access Project (the Project), with the involvement of the following ministries/agencies/units: The Ministry of Finance and Development Planning (MFDP) and Ministry of Mines and Energy (MME), working through the Liberia Electricity Corporation (LEC) and the Rural and Renewable Energy Agency (RREA), the implementing agencies in consultation with other relevant line ministries and agencies. The International Development Association acting through the World Bank (the Bank) has agreed to provide financing for the Project.
- 2. The Borrower will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
- 3. The GoL will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plans (ESMP), Resettlement Policy Framework (RPF), Resettlement Action Plan (RAP), Labor Management Procedures (LMP), and Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
- 4. The Borrower is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced above.
- 5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by the Borrower as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
- 6. As agreed by the Bank and the Borrower, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Borrower will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the Borrower. The Borrower will promptly disclose the updated ESCP.
- 7. Where Project changes, unforeseen circumstances, or Project performance results in changes to the risks and impacts during Project implementation, the Borrower shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
MONI	TORING AND REPORTING		
Α	MONITORING:		
	The work of the consultant shall be supervised by the Project Implementation Unit's (PIU) Environmental and Social Management Unit (ESMU).	Throughout project implementation	LEC and RREA
	The PIU shall be responsible for monitoring the performance of Contractor(s) in relation to contracted workers.		
	Impact and compliance monitoring shall be conducted during the construction and operation phases of the proposed project.		
	Monitoring shall be conducted to verify the predicted impacts, examine the implementation and effectiveness of mitigation measures, respond to unanticipated environmental impacts, and improve environmental controls.		
	Monitoring shall be conducted by trained individuals following monitoring and recordkeeping procedures and using properly calibrated and maintained equipment.		
	Civil works supervision engineers shall monitor compliance to the CESMP by the civil work contractors during their regular site supervision.		
	During implementation of the project components, the contractor shall be supervised by the ESMU with the support of the Environmental Consultant, when required.		
	The contractor shall ensure that it is correctly implementing the CESMP and is meeting all conditions of the Environmental Permit(s) issued by the EPA for the project component activities.		
	Use an ESMP checklist shall be used to monitor construction activities to ensure compliance.	Every quarter	

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	The contractor shall submit to the Bank an environmental and social compliance monitoring report for review and clearance.		
	Monitoring data shall be analyzed and reviewed at regular intervals and compared with the operating standards so that any necessary corrective actions can be taken.		
	Monitoring activities shall be undertaken during general construction and/or rehabilitation activities and include:		
	Environmental - Air quality; noise levels; waste disposal; end of life batteries and others; water quality; soil disturbances; tree clearing / trimming; traffic disturbance; and occupational health and safety.		
	Social – Job created by the project; and cultural sites.		
	In addition to the quarterly E&S compliance monitor reporting, the ESMP provisions for reporting implementation progress shall be monitored and reported in the project's semi-annual progress reports and periodic reports.		
	The overall safeguards implementation process shall be supervised and monitored, and progress reports on the application of safeguards during the planning, design, and construction phases of the Project shall be prepared.		
В	REGULAR REPORTING:		
	The Borrower shall develop the reporting requirements and procedures to ensure compliance of the contractor(s).	Within one month of notice to proceed	LEC and RREA

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	The Borrower shall prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including, but not limited to, stakeholder engagement activities and review of GRM records. The regular reporting will also cover progress on the implementation of the ESCP	Quarterly throughout the project implementation period	LEC and RREA
С	INCIDENTS AND ACCIDENTS:		
	The Project will promptly notify the Bank of any incident or accident related to, or having an impact on, the Project, which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers. This will include workplace accidents, incidence of SEA/SH, Protection of Woman and Child Adolescent Health and well-being, maternal mortality and the notification of teenage pregnancy, labor related, work & vehicle related. This report will be submitted to the World Bank and the Ministry of Mines and Energy.	Notify the Bank within 48 hours after learning of the incident or accident.	LEC and RREA, Contractor(s)
	Subsequently, if requested by the Bank, the Borrower shall prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.	A subsequent detailed report would be provided within a timeframe acceptable to the Bank/Association.	LEC and RREA
D	CONTRACTORS' MONTHLY REPORTS:		
	Contractors' monitoring reports to the Project Implementation Unit (PIU) shall cover ESHS aspects.	Monthly throughout the project implementation period	LEC and RREA, Contractor(s)
	monthly civil/electrical work progress reports.		

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	The status of ESMP implementation shall be incorporated regularly in the PIU's monthly report.	Monthly throughout the project implementation period	LEC and RREA
	Per the LMP, a regular employment report (e.g., Names of staff, category, ages, gender, hours work and wages paid), incident report including grievances shall be submitted by contractors on a monthly basis or at shorter intervals as defined by specific ESMPs.	Monthly or more frequently as defined in ESMPs.	Contractor(s)
ESS 1:	ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISK	S AND IMPACTS	
1.1	ORGANIZATIONAL STRUCTURE:		
	The LEC and RREA will utilize their existing PIUs and E&S specialists for the grid and off-grid components respectively for LESSAP-2 (Note: LEC currently has 7 E&S specialists in the LEC PIU that serve all WB funded projects. An 8 <sup>th</sup> specialist (social/gender) is currently being recruited; RREA has 5 E&S specialists) <sup>1</sup> . These E&S specialists have gained some experience working on the ongoing Bank financed projects, including LESSAP-1. LEC has additional senior social safeguard / safety specialists to oversee the rehabilitation / installation works in electrified communities.	Throughout the Project	LEC and RREA

<sup>&</sup>lt;sup>1</sup> Responsibilities of an OHS Specialist are shared within the PIU, specifically by the Environmental and Social Safeguard Unit. The current environmental specialist has obtained a NEBOSH certificate in OHS and participated in several OHS and ESRM training facilitated by the World bank. Hence, has acquired the relevant skills and competency to undertake OHS duties on LESSAP. The environmental specialist at LEC also conducts incident investigation and reporting, health and safety induction for workers, reviewing contractors' risk management plans, Workers' GRM etc.

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
1.2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS:		
	An Environmental and Social Management Framework (ESMF), including an Environmental and Social Management Plan (ESMP), and a Resettlement Policy Framework (RPF), were prepared under LESSAP-1. The ESMF sets out the principles, rules, guidelines and procedures that LEC and RREA will follow when assessing the environmental and social risks and impacts of subprojects' activities. The RPF has set out the principle, policies, rules, guidelines and procedures to prepare Abbreviated Resettlement Action Plans (ARAP) / Resettlement Action Plans (RAP) should land acquisition, restriction on land use and/or involuntary resettlement is required by the Project.	Implement the ESMF along with its ESMP framework and the RPF throughout Project implementation.	LEC and RREA
	The Borrower shallwill update, disclose and adopt the ESMF and RPF prepared under Phase I for Phase II by effectiveness, which will then guide the preparation of subsequent E&S screening and ESMPs according to ESF, GIIP, and WB EHS Guidelines.	By effectiveness	
	The Borrower is required to update and adopt the SEP prepared under Phase I, . The Existing ESCP for Phase I will be updated for Phase II to address the environmental and social obligations of the borrower as by the relevant ESSs and national regulations.	By Appraisal	
	Screening to identify the nature and magnitude of LESSAP project components' potential environmental and social impacts and determine the category to which such projects belong (A, B, or C) was completed under LESSAP-1. No ESIA has been proposed for LESSAP-2.	Prior to project implementation	LEC and RREA

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	PIU Procurement Department shall select and hire a consultant from a list of EPA certified Environmental Evaluators to conduct relevant environmental and social impact studies from an independent impact assessment viewpoint, when required.	Prior to project implementation	LEC and RREA
	An environmental audit shall be conducted in cases where an existing site is being rehabilitated and in cases where PCBs are involved.	Throughout Project implementation if and when required	LEC and RREA
	Environmental permits identified in the ESMF shall be obtained for construction works.	Prior to project implementation	LEC and RREA
1.3	MANAGEMENT TOOLS AND INSTRUMENTS:		
	The ESMF, LMP, SEP and RPF have been prepared thereby satisfying the requirements of the Environmental Protection Management Law (EPML) of Liberia.	Prepared, cleared by association, disclosed and fully implemented prior to moving to the site for	LEC and RREA
	No ARAPs / RAPs were required for LESSAP-1. The requirement for ARAPs/RAPs has not been identified for LESSAP-2, if requires, will be prepared in the event that land acquisition, restriction of land use or involuntary resettlement is identified for LESSAP-2.	clearance for starting civil work	
	However, the SEP prepared for LESSAP Phase I, shall be updated disclosed and adopted for Phase II by appraisal.		
	While the ESMF, LMP and RPF shall be updated, disclosed and adopted by effectiveness.	By appraisal	
	Preparation of Environment, Health and Safety (EHS) Plan <u>and E-waste</u> <u>management plan</u> as stand-alone documents or part of the ESMP both for construction and operation;	By effectiveness	

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	o ESMP and LMP provisions to be included in the Bidding documents and contracts.		
1.4	MANAGEMENT OF CONTRACTORS:  The Borrower shall incorporate the relevant E&S aspects identified in the ESMF and the LMP into the ESHS specifications of the procurement documents for civil works. Measures related to hazardous waste and OHS management shall be identified in the procurement documents.	Prior to the preparation of procurement documents	LEC and RREA
	Thereafter contractors shall comply with the ESHS specifications of their respective contracts.	Throughout Project implementation.	LEC and RREA
1.5	PERMIT, CONSENTS AND AUTHORIZATIONS:		
	The Borrower shall seek and obtain the necessary approvals, permits and authorizations from the Environmental Protection Agency (EPA) and other relevant national authorities as applicable.	Prior to initiating activities that require permits, consents and authorizations	LEC and RREA
	The Project shall comply or cause to comply, as appropriate, with the conditions established by these permits, consents and authorizations throughout Project implementation.		

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
1.6	EXCLUSIONS:		
	The following type of activities are ineligible for financing under the Project:	During the ESMF process	LEC and RREA
	<ul> <li>Activities that may cause long term, permanent and/or irreversible adverse impacts;</li> </ul>		
	<ul> <li>Activities that may have significant adverse social impacts;</li> </ul>	/	
	<ul> <li>Activities that harm the rights of vulnerable people;</li> </ul>		
	<ul> <li>Activities that may have adverse impacts on cultural heritage; and</li> </ul>		
	• All the other excluded activities set out in the ESMF of the Project.		
ESS 2:	LABOR AND WORKING CONDITIONS		
2.1	LABOR MANAGEMENT PROCEDURES (LMP):		
	The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), setting out grievance arrangements for workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms specifically on labor management, worker accommodations, grievance procedures and provision to avoid any SEA/SH incidences.	Throughout Project implementation	LEC and RREA, Contractor(s)
	The LMP has been prepared and shall be updated disclosed, adopted, and implemented consistent with ESS 2. The LMP shall be updated and rporated into the [ESMP].	By effectiveness	LEC and RREA

MATERIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
Contracts with selected contractors shall include provisions related to labor and occupational health and safety, as provided in the World Bank 2018 Standard Procurement Documents.	Prior to project implementation	LEC and RREA, Contractor(s)
Overall project coordination, including implementation of the LMP, shall remain the responsibility of LEC and RREA.	Throughout Project implementation	LEC and RREA
Both PCMU/PIUs shall have an Environmental and Social Management Unit (ESMU) in charge of overseeing the implementation of the LMP and other Safeguards related subjects, with E&S specialists tasked with coordinating all activities under the LMP at the PCMU/PIUs level.	Throughout Project implementation	LEC and RREA
For project activities involving renovation/refurbishment and minor civil works, the contractor(s) shall oversee labor and safety performance on a regular basis (daily) on behalf of the Employer.	Daily	Contractor(s)
The PIU safeguard team shall closely supervise the Contractor Recruitment Plan and ensure recruitment procedures are transparent, public and non-discriminatory, and open with respect to ethnicity, religion, sexuality, disability or gender.	Throughout Project implementation	LEC and RREA
<ul> <li>Specific measures to be implemented by the contractor(s) and monitored by the PCMU/PIU safeguard team shall include:         <ul> <li>Provide all information and documentation at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur.</li> <li>Where applicable, provide project workers with written notice of termination of employment and details of severance payments in a timely manner.</li> </ul> </li> </ul>	Throughout Project implementation	Contractor(s), LEC and RREA

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	<ul> <li>Pay project workers on a regular basis as required by national law and labor management with a principle of "equal pay for equal work".</li> <li>Provide all project workers with adequate periods of rest per week, annual holiday and sick leave, as required by national law.</li> <li>Base employment of project workers on the principle of equal opportunity and fair treatment, with no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.</li> <li>Safeguard the interests of women and girls, including gender parity at the workspace, provision of appropriate sanitation facilities at workplace and appropriate PPEs for women.</li> <li>Encourage minimizing risks related to labor influx by utilizing community labor or local contractors wherever possible.</li> </ul>		RESI CIRSISEE EIRITT
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS:  The Project shall develop and operate a separate grievance redress mechanism [GRM], as described in the Labor Management Plan (LMP) and consistent with ESS2, for project workers' contracts, with specific GRM for contractor staff in line with the LMP, SEP and ESMF to address worker grievances and shall be maintained and operated throughout project implementation.  The Contractor shall inform workers, and sub-contractor(s), and display publicly at each work-site the information about the existing project GRM.	sEtablish before start of the work, Maintained and operated throughout project implementation.  Prior to start of the work	LEC and RREA, Contractor(s)  Contractor(s)

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	A GRM committee responsible for investigating and resolving labor related complaints shall be set up at the LEC/RREA. The committee shall comprise five (5) persons and the meeting of any three (3) persons shall constitute a quorum.	Prior to implementation	LEC and RREA, Contractor(s)
	The GRM committee shall be headed by the PIU/PCMU coordinator and the secretary to the committee shall be the social safeguard staff recruited at the PIU/PCMU.	Prior to implementation	LEC and RREA, Contractor(s)
2.3	OCCUPATIONAL HEALTH AND SAFETY MEASURES:	/	
	Contractor(s), in accordance with contract specific Labor Management Plans, shall have primary responsibility for workplace health and safety, and shall be required to respect guidelines provided in the LMP, implementation of which will be supervised by Safeguards Specialists at LEC and RREA.	Throughout project implementation	LEC and RREA, Contractor(s)
	Contractor(s) shall be required to hire a qualified and experienced OHS Specialist and prepare detailed OHS plan for the management of labor/OHS issues.	Prior to implementation	Contractor(s)
	Contractor(s) shall develop a TOR for recruiting an OHS Specialist, subject to review and approval by the safeguard team of LEC/RREA.	Prior to implementation	Contractor(s), LEC and RREA

MATERIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
Contractor(s) shall prepare and implement their respective site specific OHS plans, as necessary. The OHS measures shall be followed throughout project implementation. They shall address: (a) identification of potential hazards to project workers, particularly those that may be life-threatening; (b) provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances, and use of personal protective equipment (PPE); (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; (e) emergency prevention and preparedness and response arrangements; and (f) remedies for adverse impacts such as occupational injuries, deaths, disability and disease.	At the deployment of workers on the project site and prior to commencement of civil work and implemented throughout the project life	Contractor(s), LEC and RREA
The project contractor shall conduct occupational health and safety awareness for workers in the following areas:  Occupational health and safety; Emergency preparedness and response; Community health and safety; E&S risk management; Labor management procedures; and Gender-based violence and SEA/SH	At the deployment of workers on the project site and prior to commencement of civil work and implemented throughout the project life	Contractor(s), LEC and RREA
The Project shall ensure that contractors, subcontractors and their workers are trained and are aware of risks and avoid and mitigate impacts on local communities. LEC/RREA shall develop a training manual indicating staff and the training schedule to address risks related, but not necessarily limited, to:  • Slips and falls • Falls from height	At the deployment of workers on the project site and prior to commencement of civil work and implemented throughout the project life	LEC and RREA, Contractor(s)

TERIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTIT
<ul> <li>Contact with moving parts of machines and tools</li> </ul>		
<ul> <li>Contact with electrical tools and wires (electrocution)</li> </ul>		
<ul> <li>Inadequate wiring and overloaded circuits</li> </ul>		
<ul> <li>Exposure to hazardous substances</li> </ul>	/	
<ul> <li>Overexertion</li> </ul>		
<ul> <li>Moving vehicles and equipment and falling objects</li> </ul>	/	
Exposure to high level of noise	,	
Heat exhaustion		
<ul> <li>Exposure to dust and damaged insulation</li> </ul>		
<ul> <li>Exposures to metal fumes and to ultraviolet (UV) radiation</li> </ul>		
<ul> <li>Exposure to hand-arm vibration (HAV) or whole-body vibration</li> </ul>	/	
(WBV)	<u> </u>	
GBV and SEA/SH		
Measures adopted by the Project for addressing occupational health and	At the deployment of workers on	LEC and RREA
safety issues shall apply to civil servants assigned to serve in the PCMU/PIU	the project site and prior to	
of the Project.	commencement of civil work and	
	implemented throughout the	
	project life	

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
3.1	WASTE MANAGEMENT PLAN:		
	Handling and disposal of hazardous waste (lithium batteries, solar panels and transformer oils) and e-wastes (meters) are potential ESHS risks associated with LESSAP-2. A waste management plan shall be developed, consistent with ESS3, within the CESMP for review and approval by the ESMU/PIU. It will cover solid wastes, liquid wastes, gaseous wastes and hazardous wastes, including safe handling and disposal of hazardous wastes such as lithium batteries and solar panels and e-wastes that will be generated under the project.	To be included in the ESMP to be prepared prior to project implementation and implemented throughout project implementation.	LEC and RREA, Contractor(s)
	There are limitations with the disposal of hazardous waste in Liberia as no hazardous waste disposal site is available. The Liberian Environmental Protection Agency (EPA) has a list of waste service providers responsible for disposal of hazardous waste through the process of recycling. For disposal purposes, the waste service providers shall be contracted. The manufacturers of the solar panels and batteries shall be contacted for repair or replacement, where possible. The manufacturers shall be contracted to conduct basic operation and maintenance training for the safeguard team of LEC and RREA, EPA and MOH technicians.	To be included in the ESMP to be prepared prior to project implementation and implemented throughout project implementation.	LEC and RREA, Contractor(s)
	Furthermore, the environmental safeguard team shall conduct routine monitoring during construction and operation phases to ensure safe handling and disposal of hazardous end e-waste.	Throughout project implementation	LEC and RREA, Contractor(s)
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:  Most of the wastes from the project activities will be generated during the civil works. They will be mainly construction related wastes that can be easily handled and managed.	To be included in the ESMP to be prepared prior to project implementation and implemented throughout project implementation.	LEC and RREA, Contractor(s)

MATERIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
The ESMP prepared for the project shall be implemented and a Construction Environmental and Social Management Plan (CESMP) outlining specific mitigation measures for effective management/monitoring of E&S risks associated with LESSAP, including procedures for disposal of construction waste materials, shall be prepared and implemented.	To be included in the ESMP to be prepared prior to project implementation and implemented throughout project implementation.	LEC and RREA, Contractor(s)
All agreed measures described in the CESMP shall be included as appropriate.	/	
A separate budget line for smooth implementation of the ESMP shall be prepared.		
The ESMP shall be shared and communicated with subcontractor(s) to ensure the ESMP is implemented during project construction works.		
The ESMP shall include sub-plans as follows:  Air quality Noise Waste management PCB waste Hazardous waste Damage to private property Surface water Soil and groundwater Flora and fauna; erosion Land clearing Dust and noise during construction Traffic Worker health and safety Community health and safety Protecting workers and local communities from COVID-19		

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	<ul> <li>Gender and socio-economic</li> <li>Physical cultural resources (Chance Find Procedure)</li> </ul>		
ESS 4:	COMMUNITY HEALTH AND SAFETY		
4.1	TRAFFIC AND ROAD SAFETY:  The project contractor shall develop and implement an Occupational Health and Safety Management Plan as well as Traffic and Road Safety Management Plan to mitigate adverse project impacts on beneficiary communities as well as safeguard project affected communities from traffic and road safety risks, diseases and hazardous materials associated with project implementation and operation. The contractor's environment, health and safety plan shall include a traffic management plan as required by the ESMP. The contractor shall coordinate with National traffic authorities (e.g., the Liberia National Police) to guide the implementation of the traffic management plan.	To be finalized and approved prior to commencement of civil works.	Contractor(s)
4.2	COMMUNITY HEALTH AND SAFETY:  The contractor shall develop and implement measures and actions to assess and manage specific risks and impacts to the community arising from project activities, including in relation to project workers and any risks of labor influx. Particular focus shall be on the workers' work place behavior with prohibition on disturbance to the local community.  Implement key safety and health protocols for stakeholder engagement.	Maintain throughout Project implementation.	Contractor(s)  LEC and RREA
4.3	SEA AND SH RISKS:		

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	A GBV risk assessment shall be conducted and measures and actions developed and implemented to manage the risks of SEA/SH that may arise during project implementation.	Update GBV action plan of Phase I prior to effectiveness, adopt and implement prior to start of the project implementation .	
ESS 5:	LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RES	ETTLEMENT	
5.1	RESETTLEMENT POLICY FRAMEWORK:	/	
	Minimum land acquisition was expected under LESSAP-1, but because exact project component locations was not known at that time, a draft Resettlement Policy Framework (RPF) was prepared for the Project, consistent with ESS5, to guide assessment of the impact of planned project activities on assets and livelihoods.	Update RPF and disclsoe prior to effectivness and implement throughout the project life.	LEC and RREA/GOL
5.2	RESETTLEMENT ACTION PLANS:		
	Following preparation of the RPF for LESSAP-1, it was subsequently determined that no land acquisition was required for LESSAP-1 and, therefore, no Resettlement Action Plan (RAP) was needed.		
	In the event of any need of land acquisition, restrictions on land use and involuntary resettlement under LESSAP-2, site specific Resettlement Action Plans will be prepared, and implemented, and a compensation and resettlement assistance completion report shall be prepared and submitted to the Bank to obtain NOC prior to start of the work.	Prior to site handover to the contractor(s) and the commencement of any activities in project area(s) that requires the land	LEC and RREA/GOL

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
			LEC and RREA/GOL
	In the event of involuntary resettlement becoming necessary, compliance with ESS5 and the laws of Liberia and regulations of relevant agencies and institutions will be necessary to mitigate any adverse impacts.	Prior to site handover to the contractor	LEC and RREA/GOL
	In such cases, a compensation and resettlement completion report shall be prepared for each subproject.	Two weeks after compensation payment completion and three months prior to site handover to the contractor for each site	LEC and RREA/GOL
	Site(s) shall be handed over to the contractor.	Three months after completion of compensation payments in the entire subcomponent impact corridor	LEC and RREA/GOL
5.3	GRIEVANCE REDRESS MECHANISM: In the event that any resettlement actions are required, the grievance redress mechanism (GRM) developed to address resettlement related complaints shall be described in RPF, RAP and SEP documents prepared for LESSAP-2.	Include when documents are drafted and established after baseline survey conducted	LEC and RREA/GOL
ESS 6:	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVI	NG NATURAL RESOURCES	
6.1	BIODIVERSITY RISKS AND IMPACTS:		
	ESS 6 is not considered relevant to the project at this time as none of the project components will occur in natural habitats or in areas with biodiversity. The project components will be developed within urban areas or small towns.		
	Maintain correct spacing between energized components, and evaluate the need for bird deterrents or diverters, insulated jumper loops, and	During MV&D construction	Contractor(s)

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	elevated perches to protect avian fauna to mitigate the risk of bird collisions, especially for large terrestrial birds that will be at increased risk of collision with the earth wire.		
	Ensure adequate selection of the location of the district offices or routes for the distribution lines to reduce impacts on biodiversity.	During MV&D construction	Contractor(s)
ESS 7:	INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERV	/ED TRADITIONAL LOCAL	
7.1	This standard is not considered relevant for LESSAP-2. The preliminary assessment suggests that there are no distinct social and cultural groups in the project area who exhibit characteristics akin to the criteria for indigenous or traditionally under-served communities as defined in the ESS7.	Not Applicable	
ESS 8:	CULTURAL HERITAGE		
8.1	This standard is considered relevant even though the project activities may not have an impact on tangible and intangible cultural heritage. In the unlikely event of construction or the movement of earth in connection with any project activities that have not yet been anticipated, a chance find procedure has been prepared and integrated into the ESMF and will be implemented for the Project.	Throughout project implementation.	LEC and RREA, Contractors
ESS 9:	FINANCIAL INTERMEDIARIES		
	Not relevant to LESSAP-2		

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
ESS 10	: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION:	Updated SEP to be disclosed 10	LEC and RREA
	A Stakeholder Engagement Plan (SEP) was prepared for LESSAP-1, and has been updated for LESSAP-2. It shall be disclosed, consulted, adopted, and implemented consistent with ESS10 including 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.	days prior to DM/Appraisal	
	<ul> <li>Key activities shall include, but not necessarily be limited to, the following:</li> <li>Updating and consultation and disclosure of the existing Environmental and Social Commitment Plan (ESCP) – Before Appraisal;</li> </ul>	By Appraisal	
	<ul> <li>Updating and consultation and disclosure of an existing Stakeholder Engagement Plan (SEP), including draft grievance redress mechanism (GRM) - Before Appraisal;</li> </ul>		
	<ul> <li>Updating and, consultation and disclosure of existing Environmental and Social Framework (ESMF), Resettlement Policy Framework (RPF) and Labor Management Procedures (LMP) by effectiveness.</li> </ul>	By effectiveness	
	<ul> <li>Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):</li> </ul>		
	<ul> <li>Institutional arrangements for the management of ESS standards;</li> </ul>	To be implemented throughout	
	<ul> <li>Finalize the update of RPF, LMP, and SEP in a timely manner;</li> </ul>	project implementation	
	<ul> <li>Finalize the update of RPF, LMP, and SEP in a timely manner;</li> </ul>	project implementation	

MATERIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
<ul> <li>Updated Environmental and Social Management Plan (ESMP) for construction and operation phases for Components 1, 2, and</li> </ul>		
<ul> <li>Implementation and supervision of SEA/SH Action Plan;</li> </ul>		
<ul> <li>Development and implementation of institutional environmental and social capacity strengthening plan;</li> </ul>		
<ul> <li>Preparation of Environment, Health and Safety (EHS) Plan <u>and E-waste</u> <u>management plan</u> as stand-alone documents or part of the ESMP both for         construction and operation;</li> </ul>	/	
ESMP and LMP provisions to be included in the Bidding documents and contracts.	/	
Conduct public consultation and public awareness programs.		LEC and RREA
		LEC and RREA
<ul> <li>Publish a "notice of intent" that states the information that may be necessary to allow the stakeholders or any interested party to identify their interest in the proposed project or activity following submission of any application for an environmental impact assessment permit. Information to include: the nature of the project, its related activities, its timeframe and its site of operation and the area that may be impacted.</li> </ul>		LEC and RREA
	By Appraisal	LEC and RREA / WB

MATERIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
<ul> <li>Ensure meaningful consultations with various stakeholders (including project affected communities, women and youth groups, NGOs, line ministries, community-based groups and other vulnerable and disadvantaged members of the communities) throughout the project life cycle.</li> </ul>		LEC and RREA
<ul> <li>Provide stakeholders with accessible and inclusive GRM to raise issues and grievances, that will allow LEC to receive, respond to, facilitate resolution of concerns and manage grievances.</li> </ul>		LEC and RREA
Ensure that all stakeholder consultations are accessible and inclusive (in format and location), and that these consultations will be appropriate for the local context.		LEC and RREA
Provide stakeholders with timely, relevant and understandable information in a culturally appropriate format.		LEC and RREA
<ul> <li>Undertake consultations with the following stakeholder groups: Government and regulatory relations; Non-governmental organizations; Local stakeholders; and Disadvantaged and vulnerable groups.</li> </ul>		LEC and RREA
Publicly disclose any ESIA prepared in accordance with EPA and World Bank requirements.		LEC and RREA
Disclose all safeguards documents in public locations within Liberia.  Make simplified summaries available. Documents to be made		LEC and RREA

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	available in English in compliance with the World Bank's Public Consultation and Disclosure Policy.		
	<ul> <li>Use a variety of communication methods to reach the majority of stakeholders.</li> </ul>		LEC and RREA
10.2	PROJECT GRIEVANCE REDRESS MECHANISM (GRM):  A grievance redress mechanism (GRM) has been developed for LESSAP, that is designed to resolve complaints and grievances in a timely, effective, and efficient manner, and will build, strengthen and upgrade the existing GRMs already established and being managed by LEC and RREA for ongoing World Bank financed projects LACEEP and AF (P133445), and LIRENAP(P149683), in a manner consistent with ESS10.  Key activities shall include, but not necessarily be limited to, the following:	GRM to be in place and functioning prior to project implementation and thereafter maintained and operated throughout Project implementation.	LEC and RREA
	<ul> <li>Handle grievances at the local community and project level (PCMU/PIU) by Grievance Redress Committees (GRCs) comprised of representatives of project affected and interested persons including local community leaders established through PCMU/PIUs at LEC/RREA, including via a dedicated hotline which will be established.</li> <li>Where grievances cannot be resolved at the local level, provide the</li> </ul>		LEC and RREA
	aggrieved person with the option to refer the matter to the PCMU/PIU at LEC and RREA for redress.		
	<ul> <li>If the complainant is still dissatisfied with decision reached at the PCMU/PIU, he/she may have an option to seek judicial remedy.</li> </ul>		LEC and RREA

MATE	RIAL MEASURES AND	TIMEFRAME	RESPONSIBLE ENTITY
	<ul> <li>Contractor(s) shall be required to identify focal points and communication channels (for example, WhatsApp, SMS and email) within the company to address workers' concerns on an ongoing basis, and ensure that such channels are adequately resourced (for example, 24-hour staffing of the emergency response call line).</li> <li>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.</li> </ul>		Contractor(s)  LEC and RREA
CAPA	CITY SUPPORT		
CS1	LEC/RREA shall develop a training manual identifying staff and the training schedule for E&S staff of LEC and RREA as they are relatively new to ESF/ESSs notwithstanding exposure to ESF/ESSs in LESSAP-1.	Prepare a training manual within 30 days of effectiveness of LESSAP-2	LEC and RREA
CS2	Staff involved in E&S will regularly attend training to discuss and address emerging issues and challenges in E&S implementation.	Ongoing throughout life of project	LEC and RREA
CS3	The Project will implement training for project workers designed to heighten awareness of risks and to mitigate impacts on local communities. The project will ensure that contractors, subcontractors and their workers are trained and are aware of risks and requirements to mitigate impacts on local communities, including receiving training on occupational health and safety and emergency prevention and preparedness and response arrangements to emergency situations.	Prior to commencing work or employment and regular refresher training throughout project implementation.	LEC and RREA
CS4	The Project will support the following basic trainings:	The relevant trainings or capacity building interventions	LEC and RREA

MATERIAL MEASURES AND		TIMEFRAME	RESPONSIBLE ENTITY
	<ul> <li>Introduction &amp; understanding of ESS1-10;</li> </ul>	for implementing agencies will	
	<ul> <li>Basics training on preparation and implementation of RAP;</li> </ul>	be financed by Project Component 3	
	<ul> <li>Requirements for implementing and updating SEP, on an as required basis;</li> </ul>		
	<ul> <li>E&amp;S requirements integration in the bidding document and procurement process;</li> </ul>		
	Implementing and supervising the relevant ESSs under the Project		
CS5	Open training sessions for individuals from the EPA, MOH and other concerned ministries and governmental authorities to strengthen institutional capacity and environmental and social awareness.	Within 3 months of notice to proceed	LEC and RREA
	Conduct post-training appraisals of training sessions to improve the training program	Following delivery of each training module	LEC and RREA