



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 12/21/2021 | Report No: ESRSA01818



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Sierra Leone	AFRICA WEST	P176789	
Project Name	Productive Social Safety Nets and Youth Employment		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing	12/14/2021	3/21/2022
Borrower(s)	Implementing Agency(ies)		
The Republic of Sierra Leone	National Commission for Social Action (NaCSA)		

Proposed Development Objective

The objective is to improve access to social safety nets and income generating opportunities for targeted beneficiaries.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>40.00</b>

**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

**C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]**

The objective of the proposed Productive Social Safety Net and Youth Employment (PSSNYE) project is to improve access to social safety nets and income generating opportunities for targeted beneficiaries. It aims to tackle key constraints faced by different segments of the Sierra Leonean population. Component 1 of the proposed PSSNYE targets extreme poor households, who constitute about 12.8 percent of Sierra Leone’s population, and mostly reside in urban areas. Component 2 targets eligible youth aged 18-35 from extreme poor and poor households in rural areas and poor households in urban areas to provide income and employment support through public works activities that are aimed at supporting initiatives related to climate adaptation and mitigation. Component 3 targets eligible youth aged 18-35 in urban areas from poor and non-poor households with some level of education to provide them



business training and grants, and to connect them with relevant opportunities for employment and empowerment through a youth portal. Finally, Component 5 targets the segment of the population that are increasingly vulnerable to climate-change induced natural disasters and other types of shocks and supports them through emergency cash transfers through the CERC Component. In terms of the resource envelope, US\$ 17 million will be targeted to extreme poor households, US\$ 4 million to vulnerable population at risk of facing shocks and natural disasters, another US\$ 3 million to youth from extreme poor and poor households in rural areas, and US\$ 9 million to youth from urban poor and non-poor households in urban areas.

The country with a population of about 7.8 million had a Gross Domestic Product (GDP) per capita of US\$1,794 in 2019 and is among the lowest income countries in the world with large percentage of the population living below the poverty line.. The Ebola (EDV) epidemic and the global drop in iron ore prices caused the GDP to fall by 21 percent, with sharp job losses and decline in activities in agriculture and manufacturing. Throughout the last two decades, the country's reliance on commodity exports has caused economic growth to be highly volatile. Furthermore, the current and projected youth demographic increased coupled with Sierra Leone's growth gains have not been accompanied by an increase in diversification or an expansion of employment opportunities could be potential source of fragility.

Social protection (SP) is a critical policy instrument in Sierra Leone to address the multiple risks and vulnerabilities faced by citizens. Despite the efforts by the government in recent years, gaps in coverage of SP programs remain a concern, with COVID-19 further leading to stagnation in poverty reduction - including leaving more than 40 percent of the extreme poor households without any support. Moreover, the country has high proportion of youths who are Not in Education, Employment or Training (NEET), with female youth suffering high NEET rates compared to male youth. The share of youth who are NEET is considerably higher for youth (18 percent) compared to non-youth (13 percent) and NEET rates are particularly high among female youth (19 percent) and urban youth (22 percent). High NEET rates among female youth particularly arise from two main sources: (i) lack of access to financial resources; and (ii) domestic responsibilities. Women and PWDs face a number of other constraints in the Sierra Leone labor market. A review of current programs that aim to advance the agenda of youth employment in the country identified gaps that the proposed project will address, especially with regards to inclusion of participants from outside of Freetown and of women and PWDs.

The GoSL has also taken important steps to improve the coordination of the SP sector. It has also taken important strides toward improving youth employment outcomes in recent years and has established the Ministry of Youth Affairs (MoYA) and the National Youth Commission (NaYCOM) to implement policies on youth empowerment. Several government and donor agencies are also working on advancing the issue of youth employment. Several Bank supported complementary projects are also supporting the SP, youth, inclusion, and climate change related agenda in the country.

Building on the successes of the existing Social Safety Nets (SSN) project, the proposed project will support the government of Sierra Leone to: (i) scale up the existing cash transfers support to extreme poor households who are more likely to reside in areas disproportionately affected by climate-induced disasters due to overexposure, vulnerability, and lower ability to cope and recover; (ii) introduce an integrated package of livelihood services to support build a foundation towards transition the extreme poor households out of poverty; (iii) provide productive public works opportunities to the growing number of youth in the country that not only to support them with short-term employment opportunities but also cater to the needs of the environment and help in climate change mitigation and adaptation; (iv) introduce support to the urban youth to support strengthen or create new entrepreneurship



through business grants and training; (v) establish a platform that connect youth with employment, empowerment, and training opportunities; and (vi) continue to build the capacity of implementing agencies for future implementation of social protection and jobs related programs in the country through institutional strengthening, coordination and capacity building. The proposed project is fully aligned with the objectives of the Government of Sierra Leone as well as the World Bank Sierra Leone Country Partnership Framework (CPF) for the years FY21-FY26.

#### D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The proposed Productive Social Safety Net and Youth Employment is expected to be implemented nationwide in rural and urban locations across all the 5 regions and 16 districts of Sierra Leone, with diverse environmental, social, and institutional settings. The population of Sierra Leone is estimated at 7,534,981 million in 2018 with 75 percent of the population below the age of 35 across both urban and rural areas, and across males and females.

The overall youth unemployment rate is 4 percent, rising up to 10 percent for urban male youth and 6 percent for urban female youth. Unemployment rates for youth in rural areas are below 1 percent, perhaps alluding to the fact that youths in rural areas are poorer and cannot afford to stay unemployed. However, the pace of job creation in the country has not kept up with the number of youths entering the labor market every year. These issues are further complicated by the unfolding COVID-19 pandemic as youth already grappling with limited opportunities will be further hard pressed to find employment opportunities under the current environment.

Poverty in Sierra Leone largely remains a rural phenomenon, with close to 74 percent of the population in rural areas living below the poverty line compared to 26 percent in urban areas. The Human Development Index rank for Sierra Leone is 182 out of 189 countries (UNDP, 2020). In the last decade, Sierra Leone has suffered from the triple food, fuel, and financial crisis of 2007/08; the Ebola (EVD) outbreak; the economic crisis caused by the fall in global iron ore prices; and the flood and landslides of 2015 and 2017. The EVD outbreak was more than just a health shock. It disrupted productive activities, restricted trade and prevented children from attending schools; and the strain it put on health services reduced access to treatment for other, more common conditions (visits to health facilities in Sierra Leone have dropped by 12.6 percent in April and by 9.3 percent in May 2020 compared to the data in same months in 2018 and 2019). With the economic contraction caused by COVID-19 in 2020, poverty using the international poverty line is expected to increase from 40.5 percent in 2019 to 43 percent in 2021, reversing the limited progress made in recent years.

Across the country, major agricultural activities are mostly centered on rice, cocoa, oil palm and poultry production. These agricultural activities are dominated by small-scale farmers and are mostly rain-fed. The rainy season starts from April/May and ends in October/November, while the dry season starts in November/December and ending April. The mean annual rainfall varies across the three major ecological zones; the coastal areas ranges from 3000 to 5000mm, the north-central, southern, and eastern regions have a range of 2500-3000mm and the northern region has a range of <2000 to 2500mm.

Sierra Leone's coastal areas are increasingly vulnerable to climate change due to the threat of sea level rise. The 2018 World Risk Report ranked Sierra Leone 24th out of 172 countries in terms of risk to natural disasters with significant



consequences for production levels and economic activity, especially for the poorest households who rely on subsistence agriculture.

Land in Sierra Leone is characterized by a dual ownership structure, customary tenure and private ownership. In the Western Area including Freetown, private ownership is largely recognized, whereas landownership in the rest of the provinces is mainly customary, land is controlled and administered by traditional chiefs on behalf of communities. Generally, only natives of the village are allowed to ‘own’ (freehold) land that they can pass onto their children. ‘Strangers’ or non-indigenes usually obtain farmlands through lease, either from individuals or the chief’s council.

#### D. 2. Borrower’s Institutional Capacity

The project will be implemented by the National Commission for Social Action (NaCSA) with support from the Ministry of Youth Affairs (MoYA), National Youth Commission (NaYCOM), the National Social Protection Secretariat and in partnership with the Anti-Corruption Commission (ACC), and the National Social Protection Secretariat and Statistics Sierra Leone (Stats SL).

NaCSA will be responsible for overall project coordination and implementation. NaCSA will lead the coordination and implementation of Component 1 and 2, NaYCOM and MoYA will be primarily responsible for the implementation of component 3 with support from Statistics SL on targeting of beneficiaries and ACC on building strong anti-corruption and grievance redress measures. Community Oversight Committees (COCs) consisting of six elected community members will support subcomponent 2a Sustainable Cash for Works activities at the community level, subcomponent 2b Green Public Works will be implemented through partnership with local councils.

Both NaYCOM and NaCSA have previous experience in implementing World Bank funded projects with satisfactory performance in operationalizing the Bank’s Safeguard Policies. The NaYCOM was involved in the implementation of Youth Employment Support Project (YESP; P121052) between 2010 and 2015. NaCSA has also been actively involved in the implementation of the World Bank funded Social Safety Net Project (SSNP)- (P143588) that commenced in 2014 and is scheduled to close in June 2023. NaCSA is responsible for the overall project management and coordination, procurement, financial management, E&S safeguards and Monitoring and Evaluation (M&E). The SSNP was an ES category C. No World Bank (WB) E&S safeguards policy was triggered, however, within the course of project implementation, WB provided continuous training and support to manage E&S issues such as Gender Based Violence (Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), Grievance Mechanism, Disability Inclusion and stakeholder consultations. ES performance has consistently been satisfactory.

This new project will be covered under the new Environmental and Social Framework (ESF) however, none of these institutions both government, PIU staff and consultants, have experience implementing a project under the ESF from the findings of the E&S institutional capacity assessment conducted as part of project preparation. NaCSA is in a hiring process to recruit a Social Development Specialist (SDS) to monitor and supervise safeguards implementation by ensuring adequate risks identification, management, and reporting. In addition, under the PSSNYE, NaCSA will be required to appoint a dedicated environmental specialist to support Environmental risk management for the labor-intensive public works. The Environmental Specialist and SDS shall provide E&S support for risk identification, management and reporting for the Project. The SDS shall also maintain oversight on SEA/SH mitigation. These Specialists shall be supported by an Environmental and Social Officer (ESO) from the Local Councils. Environmental Specialist shall work with the Country’s National Disaster Management Agency (NDMA) to facilitate earlier and more reliable response and recovery to climate and disaster shocks, and over time. NACSA may also hire external expertise and consultancy services, where necessary, with terms of references acceptable to the Association.



Although NaCSA has considerable experience and capacity in overseeing relevant environmental and social safeguards implementation, other implementing partners including NaYCOM, MoYA, ACC, COCs and local councils do not have the experience or capacity to oversee relevant ESS. Training will be conducted for all implementing partners at different levels to ensure that ESS commitments are followed. District NaCSA coordinators, after being trained will support the monitoring and supervision of the implementation of ESS in the various subprojects particularly under component 2 labor intensive public works.

**II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)**

Moderate

**Environmental Risk Rating**

Moderate

The project environmental risk is rated as Moderate. The environmental risks of the project are mainly associated with small civil works, public greening activities, and agricultural activities proposed under component 2. The physical improvements on public infrastructure will involve small scale rehabilitation of existing facilities, namely; irrigation, feeder roads, gabions, roads and draining canals. The component will also finance refuse and garbage collection and waste disposal; support green public works in urban areas through cleaning and tree planting in public spaces; and cultivation of short duration crops such as rice, cassava, potatoes, vegetables. The main environmental impacts anticipated include: (i) disposal and management of waste from physical improvements and expansions of infrastructure; (ii) health and safety of farmers, pedestrians, and other members of the community during the rehabilitation works; (iii) traffic management; (iv) occupational health and safety of workers and (v) environmental impacts associated with agricultural activities. Agricultural activities will use sustainable methods and organic fertilizers. Potential environmental risk might include loss of biodiversity or habitat, land degradation, erosion, and siltation from unsustainable tillage and pollution (air, water and land). Depending on the age and structural composition of the buildings and structures to be rehabilitated, workers may be exposed to asbestos containing materials (ACM) from removal of sections of these structures and should therefore guard against these. These risks are expected to be minimal. The cleaning and tree planting exercise would have environmental and community health benefits, but could also have minimal negative impacts on society and the environment during implementation, if it is not managed properly. While the government may have weak systems in place and poor safeguards implementation history, the localized and temporary nature of these impacts can be easily managed by the contractors using established, cost-effective, and technically feasible mitigation measures under regular supervision.

**Social Risk Rating**

Moderate

The project social risk rating is moderate. While the project activities are expected to have positive social impacts including support to extreme poor and vulnerable households with regular income support through cash transfers including during emergencies, a set of economic inclusion related services to extreme poor households, and support for behavioral change under component 1; provide youth with short-term employment opportunities in rural and urban areas of Sierra Leone through Labor Intensive Public Works and life skills training under component 2; and Support for Youth Employment and Entrepreneurship opportunities under component 3; some social risks are also envisaged. Project activities under component 1 could lead to misunderstanding, exclusion of vulnerable people and elite capture if selection criteria is not transparent. To mitigate Component 1 risks, the project design has adapted

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the robust beneficiary selection criterion established during the design and implementation of the SSN project (P143588). New beneficiary households for the cash transfers will be identified using a three-stage targeting approach, combining (i) geographical; (ii) community-based; and (iii) proxy-means testing methods. Other measures to mitigate the risks of exclusion include a) focusing on key social vulnerability of targeted beneficiaries such as HIV/AIDS, disability, age and sex; b) clearly communicating its objectives and the eligibility criteria to target beneficiaries and; c) allowing strong community participation during implementation phases. Further, activities proposed under component 2 could lead to exclusion of women and persons with disabilities as they seek to participate in LIPW activities. The proposed activities could lead to physical displacement and livelihoods losses, although given the small-scale of each of the sub-project activities, displacement and livelihood losses are expected to be minimal, if any. Road safety concerns are also anticipated in project communities. Sexual Exploitation and Abuse and Sexual Harassment, occupational health and safety risks, use of child labour and forced labour especially from poor households to register for employment opportunities under this project, flooding and exposure to water borne diseases and other communicable diseases including COVID-19 are anticipated. Risks associated with component 2 will be addressed by providing cash compensation and in kind assistances for loss of livelihoods and properties to the PAPs – if impacted. As sites for the implementation of the proposed activities under component 2 are not known at the stage, a Resettlement Framework has been prepared to guide the preparation of Resettlement Plans to address compensation related issues during implementation. Those risks associated with road safety, OHS, child and forced labor, floods exposure, and spread of community diseases will be mitigated by developing appropriate mitigation measures and action plans as required by the ESMF developed by the project. The proposed activities under component 3 could lead to exclusion if opportunities are not made accessible to, for example, youth with disabilities and selection criteria are not transparent. This risk will be minimized by: (i) ensuring a strong communication strategy and outreach to solicit applications from youth including vulnerable youth; (ii) selection criteria to select beneficiaries of subcomponent 3a defined in the Project Implementation Manual to ensure participation of vulnerable groups; and (iii) clear targets in terms of enrolling female beneficiaries and youth with disabilities set in the contracts of service providers selecting beneficiaries for the business grants.

## **B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

### **B.1. General Assessment**

#### **ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

##### ***Overview of the relevance of the Standard for the Project:***

The project activities will be implemented in both urban and rural settlements of the entire country with the objective of providing relief to poor households, persons with disabilities, improve youth employment, social cohesion, women and disability inclusion in beneficiary communities. Key environmental and social risks and impacts identified are associated with project activities under Component 1: SSN Cash Transfers and Provision of Economic and Inclusion Support, Component 2: Labour Intensive Public Works, and Component 3: Employment and Entrepreneurship Support for Youth .

Project activities under component 1 relating to cash transfer, grant support, and employment opportunities could lead to exclusion and discrimination against certain categories of vulnerable, tensions from misunderstanding on eligibility criteria, and SEA/SH. Project activities under Component 2: Productive Labor-Intensive Public Works and Life Skills Support for Youth mainly include rehabilitation of small-scale irrigation infrastructure, improvement of feeder roads, drainage canals and gabions, garbage and waste collection and disposal, and tree planting. Project





activities under Component 3 include training and business grant support to youth-led household entrepreneurs and a platform to support youth employment.

The key environmental risks include air, soil, surface and ground water pollution from wastes, loss of vegetation and fauna, habitat disruption, spills and sediments generated during rehabilitation of irrigation canals and wells, feeder roads and drainage canals; threat to aquatic, soil disturbance and erosion, wetland and terrestrial ecosystems from poor handling of construction wastes; occupation health and safety risks including COVID-19 and injuries of workers, farmers, pedestrians and the general public and risks to community health and safety and risk to cultural heritage, during executive of the works. The description of these risks at this stage is generic, but will be detailed and site-specific when additional information on the targeted beneficiaries become available as project preparation progresses. The interest and concerns of stakeholders will be factored into the project design and consultations will continue during project implementation.

From experience with tree planting in Sierra Leone, it is unlikely that agrochemicals such as inorganic fertilizers and pesticides will be used and the project will have a caveat that precludes application of these chemicals. Pressure on the limited community water source for irrigation is one of the most significant risks associated with tree planting. There is also the risk of promoting monoculture and its impact on aesthetics in public spaces. These risks are expected to range from low-moderate depending on the scale of the activity, and can be mitigated through measures described in the ESMF and site specific ESMPs.

Tree planting is expected to take place on existing public lands at the national, provincial and district levels. However some temporary or permanent acquisitions of individual or community lands may occur which could lead to physical and economic displacement although it is expected to be minimal given the small scale of the subproject activities.

On the social side, risks related to temporary occupation or permanent land acquisition and could lead to physical displacement and livelihoods losses in beneficiary communities, although given the small-scale of each of the sub-project activities, displacement and livelihood losses in beneficiary communities are expected to be minimal, if any. There could be exclusion of women and persons with disabilities as they seek to participate in these labour intensive activities. Component 2 activities could also lead to exclusion of persons with disabilities if its designs fail to follow universal design principles and requirements. SEA/SH, use of child labour and forced labour especially from rural and poor households for the LIPW activities, community health and safety risks including communicable diseases e.g. COVID-19 spread are also anticipated.

As detailed below, the relevant ESSs that apply to the project are: ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS8, and ESS10.

To comply with these standards, the project has prepared an Environmental and Social Commitment Plan (ESCP) and Stakeholder Engagement Plan which were disclosed on December 17, 2021 before appraisal.

At this stage, the exact locations of component activities are not yet known, therefore an Environmental and Social Management Framework (ESMF) with a Labor Management Procedure (LMP); and Resettlement Plan Framework have been prepared to guide the preparation of site specific instruments during implementation. The ESMF and the RPF were disclosed on December 17, 2021 prior to appraisal.





The ESMF will provide a brief description of principles and procedures to assist the project to screen project activities, using screening tools, when sites are identified and further describe measures and procedures to address and offset adverse E&S impacts and preparation of site specific ESMPs. E&S risks covered in the ESMF will include occupational health and safety, solid waste management, pollution prevention, community health and safety, child labour and force labour, management of solid waste, soil erosion, loss of vegetation, and management of potential grievances and complaints from project beneficiaries. The screening tool will determine where and when site specific ESMPs will be necessary. If the screening tool determines that no site-specific ESMPs are required, it will recommend that the activities be guided by the Generic ESMP, and the local and applicable international conventions governing E&S risk management. The contractor will be required to prepare and implement a contractor ESMP (C-ESMP), adapted from the Generic ESMP, but modified to capture local peculiarities. The Project Management Team will be required to monitor, supervise and report safeguards implementation by the contractor on a regular basis.

The RPF will provide guidance on the process for preparing, reviewing, approving, and implementing subsequent Resettlement Action Plans (RAPs), where necessary, prior to the commencement of any civil works. The preparation and implementation of Resettlement Action Plans and the RPF have been included in the ESCP .

### **ESS10 Stakeholder Engagement and Information Disclosure**

This standard is relevant. The proposed project is expected to involve multiple stakeholders across the country with diverse interest and influence on project activities. Key project stakeholders includes (i) national and subnational government agencies including Anti-Corruption Commission, National Youth Commission, Ministry of Labor and Social Security, Ministry of Youth Affairs, National Commission for Social Action, Statistics Sierra Leone, National Commission for Persons with Disabilities, Sierra Leone Union on Disability Issues, National Social Protection Secretariat; (ii) World Food Program, GIZ and UNICEF; (iii) project beneficiaries; (iv) local communities; (v) civil society; and (vi) private companies among others.

Given the multi-stakeholder nature of the project, the recipient has prepared a SEP consistent with objectives and requirements of ESS10 which has been disclosed in-country on December 17, 2021 and on the World Bank site before appraisal. The SEP includes stakeholder mapping and communication strategy for interested parties, various beneficiaries and project affected persons including disadvantaged and vulnerable groups to ensure adequate inclusion of vulnerable people and allow for meaningful stakeholder consultations and inputs in the project design and implementation. The SEP i) describes the Project stakeholders and how they will be engaged throughout the project life, with a focus on identifying vulnerable individuals or groups and applying measures to remove barriers to their participation to avoid elite capture and all inclusiveness; ii) provides a framework for citizen engagement, meaningful consultation, feedback mechanisms, iii) describes the project grievance redress mechanism (GRM) including the provision of GBV sensitive referral pathways; iv) provides the budget for SEP implementation, allocates responsibilities, and describes implementation arrangements for the implementation of stakeholder activities and, v) provides measures to ensure that all stakeholder engagement activities will be conducted in compliance with the National COVID-19 protocols on social distancing and the World Bank guidance note on “Public Consultations and Stakeholder Engagement in WB-supported operations. The SEP include measures to ensure efficiency and beneficiary satisfaction with service delivery, promote transparency and accountability to assist in reducing leakages, promote community ownership, and provide voice to the LIPW Beneficiaries who in most cases are voiceless. The



project will leverage on the existing grievance redress mechanisms under the ongoing Sierra Leone Social Safety Nets (SSN) Project (P143588) established with national coverage to address project related complaints.

## B.2. Specific Risks and Impacts

**A brief description of the potential environmental and social risks and impacts relevant to the Project.**

### **ESS2 Labor and Working Conditions**

This ESS is relevant. No large-scale construction activities will be financed by the project. However, there will be labour intensive public works that will include rehabilitation of feeder roads and community small irrigation systems, climate smart activities including tree planting among others. These works will involve community workers, particularly the youth and women, as well as some contracted workers and primary suppliers. The Project Management Team will be supported by consultants, civil and public servants at the various implementing agencies at the national and sub-national levels. The Project will include the use of community workers for the Labor Intensive Public Works (LIPW). Engagement of direct workers and contracted workers are envisaged to be on a very small scale. The requirements of paragraphs 34 to 38 of ESS2 will apply to community workers, as specified in Section F.

Government civil servants, who may provide support to the Project will remain subject to the terms and conditions of their existing public sector employment agreement or arrangements. However, the project will institute measures to protect such workers against COVID-19 to create safe working environment while supporting the project. The project will not engage security forces and migrant workers, however, when the need arises, the employment of the security personnel will be done in accordance with the provisions in ESS 4 – including assessing security personnel risks, where necessary preparing Security Management Plan. Forced labor and children under 18 will not be permitted to work project as per the labor laws of Sierra Leone as well as the ESS2 provisions under paragraphs 17, 18 and 19.

While the number of direct workers and primary supplier workers for component 2 activities cannot be estimated at this preparation stage, no large-scale labor influx is expected as local labor will mostly be used for such project activities. These workers could face risks relating to: (i) poor condition of service, (ii) occupational health and safety, (iii) exposure to COVID-19, and (iv) discrimination and harassment including sexual exploitation and abuse (SEA), and sexual harassment (SH) among others. While using direct workers the contractor will comply to the requirements of paragraphs 9 to 30 of ESS2. Similarly, the contractor, while using primary supply workers, will be required to adhere to paragraphs 39 to 42 of ESS2.

The ESMF prepared for the project include Labor Management Procedures (LMP) that reflects national labor standards as well as the the objectives and requirements of ESS2. The LMP requirements shall be incorporated into the procurement documents before launching the procurement process for the relevant subproject activities to require contractors and service providers to prepare and implement labor management plans as part of the Contractor ESMP, which will, among others, cover Occupational Health and Safety (OHS) related issues and COVID-19 prevention strategies. The project will require contractors to establish workers grievance mechanism proportionate to the nature and scale of the project to enable all direct workers, contracted workers and community workers to raise workplace concerns and to receive timely resolution and feedback to complaints. The LMP provides standard



provisions on child labor, forced labor, prohibition of sexual exploitation/abuse and sexual harassment including codes of conduct for all workers, non-discrimination and equal opportunity and occupational health and safety procedures. Based on screening, the project may require contractors to prepare site-specific Occupational Health and Safety Plan in line with World Bank Group Environment, Health, and Safety (EHS) Guidelines (for construction activities). Such plan would include site-specific measures to address OHS risks, emergency preparedness and response procedures and continuous training and awareness to workers. Project ESS Specialists shall train Contractor workers on various aspects of OHS relevant to the Project on a regular basis.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

This standard is relevant, but, by virtue of the nature and scale of project activities, the environmental footprint is anticipated to be small, as rehabilitation works are small scale and will be carried out within existing facilities. The following specific aspects in relation to ESS3 will be considered:

Inefficiency from sourcing of raw materials: the nature and source of the raw materials used in rehabilitation work are important to minimize waste and inefficiency. Construction materials and building designs shall take into consideration extreme temperature mitigation measures. To this end, national building codes shall be observed, but also aligned with internationally recognized standards. Cement, sand, timber, aggregates and sticks will be obtained from certified or licensed suppliers, or approved local sources, in close proximity to the project site to reduce transportation related risks. Materials will not be obtained from sources that could lead to deforestation or coastal erosion, affect surface or groundwater quality, or contribute to global warming. Due diligence will be conducted to ascertain the environmental compliance of contractor and primary suppliers. Water for irrigation should not be abstracted from limited community water sources, especially during the Dry Season. The project can consider harvesting rainwater for use in the Dry Season.

Air emissions: Air emissions might include exhaust fumes from heavy vehicles and machinery, and fugitive dust generated by compaction and construction activities. The people most vulnerable to air pollution are those with specific medical conditions living near the project site. These may include children and the elderly. While the scale, intensity and duration of the impact is expected to be small, dust and noxious substance emission should be minimized through dust suppression and regular vehicle/equipment maintenance.

Noise: Noise levels will vary with the project environment. Remote areas are more likely to be affected by higher noise levels caused by contractor mobilization to communities. To mitigate impact, work will be limited to daytime and on week days. The contractor will observe some decorum during school, cultural, traditional and religious events by suspending all noise generating activities on such occasions. This is important in preventing conflict with the community.

Waste management: Solid and liquid wastes generally include scraps from buildings, construction wastes, excavated soil, oils from construction machinery, concrete blocks, metal and glass pieces, domestic wastes and sewage, including sludge from rehabilitated septic tanks. Waste will be segregated, stored and disposed of at approved sites. Mobile toilets will be deployed onsite. Where asbestos wastes are unavoidably generated, the proper mechanism of handling, transporting, and disposal will be followed by a competent contractor, under the guidance of EPA.



Agrochemicals: application of inorganic fertilizers and pesticides to increase tree survival and growth will not be supported by the project. Application of animal manure and other organic fertilizers will be carried out in the project.

Assessment and management of adverse environmental risks and impacts during construction, operation, and decommissioning will be done according to ESS3 and the appropriate WBG Environmental Health and Safety Guidelines (EHSG). Green house gas (GHG) emissions generated from the project are not likely to be significant; hence, their estimation is not relevant for the project.

### **ESS4 Community Health and Safety**

This standard is relevant. The project activities will generate enormous benefits to extremely poor households and the beneficiary communities including, increased earnings from LIPW and cash transfers including emergency cash transfers, build entrepreneurship and skills development, ensuring empowerment of women, benefiting youth and persons with disabilities. However, there are also potential risks and impacts that may result from the project activities such as road safety concerns, traffic management and exposure to construction-related hazards, increased air emissions and noise, disruptions in people’s daily life activities, STDs, flooding, exposure to water borne diseases, social conflicts, among others. The project will be implemented in areas where COVID-19 infections are rife. The project ESMF includes measures to mitigate these risks. The ESMF screening tool will help in identifying site specific risks and impacts on the affected communities and establish preventive and control measures.

The potential risk of improper disposal of waste may cause health and safety concerns. The ESMF includes measures to manage potential risks related to wastes management and minimize community exposure to such risks.

The potential for beneficiaries to be exposed to SH/SEA from contractors and contract workers and workers involved in the cash transfer activities is also possible. The project will be required to prepare site specific ESIA/ESMP to consider mitigation measures to address community health and safety issues. The project GRM include measures to address risks related to SEA/SH including referral pathways for SEA/SH issues. The Project will require contractors and workers to sign a workers' Codes of Conduct (CoC). The project was rated low on SEA/SH risk using the Bank SEA/SH risk at concept stage. However, further assessment conducted during project preparation have raised the risk to moderate at appraisal. A stand-alone Gender-Based Violence (GBV) Action Plan proportionate to SEA/SH risks shall be prepared for the Association’s approval 3months after project effectiveness. Once approved, the SEA/SH Action Plan shall be part of Project ESMPs and implemented throughout Project implementation.

The Project will not engage security personnel. However, if the need arises for engagement of security personnel during Project implementation especially on crowd control during emergency interventions and youth employment support, a Security Risk Assessment (SRA) shall be conducted, and measures, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel shall be adopted, to ensure that the engagement of security personnel are carried out in accordance with the ESS4 and in a manner acceptable to the Association.

### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**



No large-scale land acquisition or physical or economic displacement is expected. However, project activities under components 2 involving rehabilitation of feeder roads, construction of small rural irrigation systems, tree planting, construction of drainage canals among others may pose some temporary disturbances to the incomes, livelihoods and access ways. These are envisaged to be small scale, community focused and will take place largely in existing footprints using local labor. However, there could be potential loss of assets and livelihoods from these project activities.

As the subproject activities are unknown at this stage, the Project has developed a Resettlement Policy Framework (RPF), in consultation with relevant stakeholders. The RPF outlines the key principles of resettlement and provides guidance on the process for preparing, reviewing, approving, and implementing subsequent Resettlement Action Plans (RAPs), where necessary, prior to the commencement of any civil works consistent with ESS 5. The preparation and implementation of Resettlement Action Plans and the RPF have been included in the project ESCP. The RF will be disclosed in-country and on the Bank external website before appraisal.

At Decision Meeting, it was agreed that if any project activity is deemed to cause displacement during implementation, NaSCA will seek approval from the World Bank to use project funds to pay compensation. Regional Vice President (RVP) memo will be prepared at that point based on the approved RAP estimates to seek approval for use of project funds to pay compensation.

#### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

This ESS is relevant to the project. The requirements of ESS6 apply to all projects that potentially affect biodiversity or habitats, either positively or negatively, directly or indirectly, or that depend upon biodiversity for their success. Small scale agricultural activities, construction and all rehabilitation works may have unintended negative consequences on habitats and the biodiversity. Works will be done on a small scale and on existing facilities, but the impact of pollution from wastes generated in the process could be far reaching, if not prevented or contained. The risk is higher in the wet season as sediments, spilled oil and debris are washed out into drains and eventually surface- and groundwater and wetlands, where they could affect species population and diversity, and in extreme cases, alter ecosystems. While such scale of impacts is not anticipated in this project, the contractor, under the supervision of the PIU shall diligently implement the contractor ESMP adapted to each specific locality. Water for irrigation must not be abstracted from surface water at a rate that could impact downstream ecosystem services.

#### **ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

Not relevant

#### **ESS8 Cultural Heritage**

This standard is relevant. As indicated earlier, the mix of project Component 2 activities will include rehabilitation of existing tertiary irrigation canals, tube wells, and construction of drainage canals etc. These activities can happen in areas where tangible and intangible cultural heritage could be found. The ESMF prepared for this project includes specific consideration for engaging relevant local communities and traditional authorities on the management of issues associated with known cultural sites and artifacts. The ESMF also includes chance finds procedures to protect



cultural values and assets and a “chance finds” clause will be added to the contracts of contractors during project implementation. In the event of a find or the observation of a cultural practice, the Project shall follow the guidelines detailed in the ESMF/ESMPs and contact the Monuments and Relics Commission (MRC) that is entrusted with the protection of cultural heritage in Sierra Leone within 72 hours of the find.

**ESS9 Financial Intermediaries**

Not relevant

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways** No

**OP 7.60 Projects in Disputed Areas** No

**B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts**

**Is this project being prepared for use of Borrower Framework?** No

**Areas where “Use of Borrower Framework” is being considered:**

The “Use of Borrower Framework” will not be considered

**IV. CONTACT POINTS**

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**Borrower/Client/Recipient**

Borrower: The Republic of Sierra Leone

Public Disclosure



**Implementing Agency(ies)**

Implementing Agency: National Commission for Social Action (NaCSA)

**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

Task Team Leader(s):	Junko Onishi, Abu Kargbo, Samik Adhikari
Practice Manager (ENR/Social)	Senait Nigiru Assefa Cleared on 20-Dec-2021 at 18:13:22 GMT-05:00