

Public Disclosure Authorized

THE REPUBLIC OF SIERRA LEONE



MINISTRY OF AGRICULTURE

**West Africa Food System and Resilience
Program (FSRP) – Original Financing (178132)
and Additional Financing (P180211)**

Phase 2 Under the Multi-Phase Programmatic Approach

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

Draft for Negotiation

16 November 2022

Public Disclosure Authorized

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Sierra Leone (*the Recipient*) will implement the West Africa Food System Program (FSRP) – Phase 2 under the Multiphase Programmatic Approach (*the Project*) (P178132) with the involvement of the Ministry of Agriculture (MOA), National Water Resources Management Agency (NWRMA), Sierra Leone Meteorological Agency (SLMA), Ministry of Trade and Industry (MTI) through the National Development Partner Project Coordination Office (NDPPCO or PIU), as set out in the Financing Agreement (“Original Financing Agreement”). The International Development Association (the Association) has agreed to provide the original financing (P178132) and additional financing (P180211) for the Project, as set out in the referred agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing (for Project referred to above).
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of Agriculture agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Chief Agriculture Officer or their assigned representative. The Recipient will promptly disclose the updated ESCP.

| MATERIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY | |
|---------------------------------|--|--|---|
| MONITORING AND REPORTING | | | |
| <p>A</p> | <p>REGULAR REPORTING</p> <p>Prepare and submit to the Association] regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p> | <p><i>Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than seven days after the end of each reporting period.</i></p> | <p>Project Implementation Unit (PIU)</p> |
| <p>B</p> | <p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p> <p>A standard incident/accident notification form shall be sent by the Recipient to all subcontractors and suppliers. This form shall not apply to incidents of SEA/SH in which case any notification of an incident of SEA/SH shall follow the information sharing protocol to respect the safety and confidentiality of the survivor (information shall include date of receipt of the incident; date of the incident; type of SEA/SH reported; age/sex of the survivor; whether the incident is related to the Project and if the survivor was referred to services).</p> | <p><i>The Association must be informed in writing immediately and no later than 48 hours after being informed of such incidents/accidents for serious accidents, and no later than 24 hours for very serious accidents, including incidents of SEA/SH or death, the Recipient must, or cause PIU to, inform the Association.</i></p> <p><i>Provide subsequent report acceptable to the Association no later than 20 days of the Association’s request.</i></p> | <p>PIU Subcontractors and service providers</p> |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
|---|---|--|--|
| C | <p>CONTRACTORS MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p> | <p><i>Submit the monthly reports to Association as annexes to the reports to be submitted under action A above.</i></p> | <p>PIU Contractors and service providers</p> |
| ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS | | | |
| 1.1 | <p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a PIU with qualified staff and resources to support management of ESHS risks and impacts of the Project including one environmental specialist, one social specialist, and one GBV specialist.</p> <p>The PIU shall hire an Environmental Specialist, Social Specialist, GBV Specialist to implement the Project and provide E&S management and reporting for FSRP2. The PIU may also hire external expertise and consultancy services, where necessary.</p> <p>The qualifications and experience of these positions shall be deemed satisfactory by the Association. In addition, the PIU shall prepare and implement a staff capacity building program based on a training needs assessment.</p> | <p><i>Establish and maintain a PIU as set out in the financial agreement. Hire one environmental specialist, one social specialist, and one GBV specialist no later than three months after Effective Date of the Original Financing Agreement, and thereafter maintain these positions throughout Project implementation.</i></p> | <p>PIU</p> |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
|-------------------------------|--|---|------------------------------|
| 1.2 | <p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>1. Adopt and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for which the ESIA/ESMP is required of the Project, consistent with the relevant ESSs.</p> <p>2. Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>3. Update the ESMF for the Project to reflect the risks and mitigation measures for the new and scaled-up project activities.</p> | <p>1. <i>Adopt the ESIA and ESMP prior to the start of project activities and thereafter implement the ESIA and ESMP throughout Project implementation.</i></p> <p>2. <i>The ESMF of the original project was disclosed on 9 May 2022, and thereafter implement the ESMF throughout Project implementation.</i></p> <p>3. <i>The updated ESMF shall be adopted and disclosed before the Effective Date of the Additional Financing Agreement.</i></p> | PIU |
| 1.3 | <p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the management tools and instruments referred to in Section 1.2 above, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications, including codes of conduct of their respective contracts.</p> | <p><i>During the preparation of procurement documents and before the start of activities by contractors.</i></p> <p><i>Supervise the application of these measures throughout Project implementation.</i></p> <p><i>Before signing of the contract and the actual start of the activities by contractors.</i></p> | PIU |
| 1.4 | <p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference</p> | <p><i>Throughout Project Implementation</i></p> | PIU |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
|--|---|---|------------------------------|
| 1.5 | <p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements including, if applicable, CERC-ESMF/ESMF Addendum that will be included or referred to in the CERC Manual for the implementation of the CERC Part, in accordance with the ESSs, the World Bank Group Environmental, Health and Safety Guidelines (EHSs), and other relevant Good International Industry Practice (GIIP) including World Health Organization (WHO) guidance documents on COVID-19 in a manner acceptable to the Association. Thereafter implement the measures and actions required under the said E&S management plans or instruments, within the timeframes specified in the plans.</p> <p>b) Prepare, consult, adopt, and disclose any environmental and social (E&S) instruments which may be required for activities under the CERC Part of the Project, in accordance with the ERM and, if applicable, CERC-ESMF or CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p> | <p>a) <i>The adoption of the CERC Manual in form and substance acceptable to the Association is a withdrawal condition under Section III.B. of Schedule 2 of the Financing Agreement for the Project.</i></p> <p>b) <i>Within three months of the Effective Date of the Original Financing Agreement, submit the CERC-ESMF for the Association's prior review and approval and include it as part of the respective bidding process, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.</i></p> | PIU |
| ESS 2: LABOR AND WORKING CONDITIONS | | | |
| 2.1 | <p>LABOR MANAGEMENT PROCEDURES (LMP)</p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p> | <p><i>Update the current LMP to reflect the risks and impacts associated with the new and scaled up project activities, not later than two months after the Additional Financing Agreement Effective Date, and thereafter implement the LMP throughout Project implementation.</i></p> | PIU |
| 2.1 | <p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p> | <p><i>Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</i></p> | PIU |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
|---|---|---|---|
| ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT | | | |
| 3.1 | <p>WASTE MANAGEMENT PLAN:</p> <p>Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3.</p> | <p><i>Adopt the WMP prior to commencement of waste generation activities, and thereafter implement the WMP throughout Project implementation.</i></p> | PIU |
| 3.2 | <p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.</p> <p>Ensure that pest management follows integrated approaches identified in the Integrated Pest Management Plan (IPMP) and that pesticides used are manufactured, formulated, packaged, labelled, handled, stored, and disposed of, in accordance with good international industrial practices as well as the World Bank Group’s Environmental Health and Safety Guidelines (EHSs).</p> | <p><i>Same timeframe as for the adoption and implementation of the ESMP.</i></p> <p><i>Update the IPMP to reflect the new project activities and areas prior to the Effective date of the Additional Financing.</i></p> | <p>PIU</p> <p>Contractors/service providers</p> |
| ESS 4: COMMUNITY HEALTH AND SAFETY | | | |
| 4.1 | <p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.</p> | <p><i>Same timeframe as for the adoption and implementation of the ESMP.</i></p> | PIU |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
|---|--|---|-------------------------------|
| 4.2 | <p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, the behavior of Project workers, risks of labor influx, COVID-19 transmission, SEA/SH, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p> | <p><i>Same timeframe as for the adoption and implementation of the ESMP.</i></p> | <p>PIU</p> <p>Contractors</p> |
| 4.3 | <p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the ESMP, 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.</p> | <p><i>Prior to the start of activities and maintained throughout Project implementation.</i></p> | <p>PIU</p> |
| 4.4 | <p>SEA and SH RISKS</p> <p>Adopt and implement a Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Prevention and Response Action Plan to assess and manage the risks of SEA and SH under the project.</p> | <p><i>Update the SEA/SH Prevention and Response Action Plan to reflect the risks and impacts associated with the new and scaled up project activities, before the Effective Date of the Additional Financing Agreement, as part of the ESMF. The mapping of GBV services shall be completed and SEA/SH Grievance Mechanism shall be implemented before the start of the Additional financing activities and included in the ESMP, and thereafter implement the SEA/SH Action Plan throughout Project implementation</i></p> | <p>PIU</p> |
| ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT | | | |
| 5.1 | <p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p> | <p><i>Update the RPF to reflect the risks and impacts associated with the new and scaled up project activities, before the Effective date of the Additional Financing Agreement, and thereafter implement throughout Project implementation.</i></p> | <p>PIU</p> |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
|---|---|--|-----------------------------------|
| 5.2 | <p>RESETTLEMENT ACTION PLANS</p> <p>Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, as set out in the RPF, and consistent with ESS5.</p> | <p><i>Adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable, displaced people have been resettled and moving allowances have been provided.</i></p> | PIU |
| 5.3 | <p>GRIEVANCE MECHANISM</p> <p>Adopt and implement the Grievance Mechanism as described in the SEP and referred to in action 10.1 below for resolution of grievances related to land acquisition and involuntary resettlement.</p> | <p><i>Same timeframe as for the adoption and implementation of the GM in section 10.2.</i></p> | PIU Contractors/subcontractors |
| ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES | | | |
| | <p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Using the screening form in the ESMF, conduct a preliminary screening and assess each of proposed activity/subproject for financing in terms of its risks and impacts on biodiversity and living natural resources.</p> <p>Where the environmental and social assessment has identified potential risks and impacts on biodiversity or habitats, the Recipient will prepare a Biodiversity Management Plan (BMP) either as stand-alone or as part of the ESMP to manage those risks and impacts in a manner proportionate to the nature and magnitude of the risks and in accordance with ESS6.</p> | <p><i>During subproject screening process and prior to commencement of Project activities.</i></p> <p><i>Adopt the BMP (if needed) and thereafter implement the BMP throughout Project implementation.</i></p> | PIU |
| ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES | | | |
| | <p>The relevance of ESS7 will be assessed during implementation.</p> | | |
| ESS 8: CULTURAL HERITAGE | | | |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
|--|---|--|------------------------------|
| 8.1 | Describe the chance finds procedures as part of the ESIA's and ESMPs, and in specific sites prepare a cultural heritage management plan, as part of ESMPs, if required. | <i>Describe the chance find procedures in the ESIA's and ESMPs. Implement the procedures throughout Project implementation. Adopt Cultural Heritage Management Plans with the same timelines as the ESMP in 1.2 above.</i> | PIU |
| ESS 9: FINANCIAL INTERMEDIARIES | | | |
| | This standard is not relevant. | | |
| ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE | | | |
| 10.1 | <p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.</p> | <p><i>Adopt and disclose the SEP before the Effective Date of the Additional Financing Agreement to reflect the risks and impacts associated with the new and scaled up project activities prior to appraisal, and thereafter implement the SEP throughout Project implementation.</i></p> <p><i>Update the SEP to incorporate recent consultations to be undertaken to reflect the new and scaled up activities under the Additional Financing by two months of Effective Date of Additional Financing.</i></p> | PIU |
| 10.2 | <p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>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.</p> | <p><i>Establish the grievance mechanism as included in the SEP no later than 60 days after the Effective Date of the Original Financing Agreement and before project activities, and thereafter maintain and operate the mechanism throughout Project implementation.</i></p> | PIU |

| MATERIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY/AUTHORITY |
|--|--|--|
| CAPACITY SUPPORT (TRAINING) | | |
| <p>Training to be provided</p> <p>The MAF shall ensure that relevant project actors are trained in the following areas:</p> <ul style="list-style-type: none"> • The project level GM (implementation, reporting, monitoring) • Stakeholder roles and engagement • Labor Management Procedures • E&S requirements (impacts and mitigation measures) of sub-projects • Subproject Environmental and Social screening • Occupational Health and Safety • Emergency preparedness and response • Communication strategy on COVID-19 and activities/protocols regarding prevention and mitigation of transmission, PPE, OHS • SEA/SH and exploitation and violence against children, risk awareness; SEA/SH Prevention and Response Action Plan, content and sanctions of CoCs, and GM-SEA/SH of project (i.e., importance, objectives, content, how to prepare it, who implements it, and how to ensure a GM sensitive SEA/SH issues • Disability inclusion training and training on inclusion of vulnerable groups such as pastoralists (including women pastoralist and farmer associations/groups) • Documentation and reporting • Other (to be determined according to needs) | <p>Target Groups and Timeframe for Delivery</p> <ul style="list-style-type: none"> • <i>Training is required for all relevant project actors at the district (Desk officers and Community Development Officers, Contractors, and their Supervisors) and community levels</i> • <i>6-12 months after Effective Date of the Original Financing Agreement and during project implementation</i> • <i>This will be done before the commencement of key works and periodic re-training throughout implementation, as needed</i> | <p>PIU</p> |
| <p>C2</p> | <p>Training of contractors in E&S requirements relevant for their assignments</p> | <p><i>Training of contractors prior to commencement of any works or services and refresher trainings throughout implementation of contract if and as needed</i></p> <p>PIU</p> |