

INTEGRATED SAFEGUARDS DATA SHEET
RESTRUCTURING STAGE

Note: This ISDS will be considered effective only upon approval of the project restructuring

Report No.: 100634

Date ISDS Prepared/Updated: 21-Oct-2015

I. BASIC INFORMATION

1. Basic Project Data

Country:	Sierra Leone	Project ID:	P126180
Project Name:	Sierra Leone Energy Access Project - Sierra Leone Infrastructure Development Fund (P126180)		
Task Team Leader(s):	Carol A. Litwin		
Estimated Board Date:	30-Oct-2012		
Managing Unit:	GEE07		
Sector(s):	General energy sector (100%)		
Theme(s):	Infrastructure services for private sector development (100%)		
Is this project processed under OP 8.50 (Emergency Recovery) or OP 8.00 (Rapid Response to Crises and Emergencies)?			No
Project Financing Data (in USD Million)			
Total Project Cost:	16.00	Total Bank Financing:	0.00
Financing Gap:	0.00		
Financing Source			Amount
Borrower			0.00
Sierra Leone Infrastructure Trust Fund			16.00
Total			16.00
Environmental Category:	B - Partial Assessment		
Is this a Repeater project?	No		
Is this a Transferred project?	No		

2. Current Project Development Objectives

The Project Development Objective are to: : (i) reduce losses in electricity supply in Freetown Capital Western Area; (ii) improve commercial performance of the National Power Authority; and (iii) increase access to electricity in selected rural areas.

Proposed New PDO (from Restructuring Paper)

The proposed new PDO is to reduce losses in electricity supply in Freetown Capital Western Area and to improve commercial performance of the Electricity Distribution and Supply Authority (EDSA).

3. Project Description

The current scope of the project comprises three components. Component I includes the rehabilitation of the primary distribution network, loss reduction and improvements of the operational and commercial performance of the distribution utility. Component II includes a rural electrification pilot program for the supply and installation of photovoltaic systems in public buildings for 14 rural villages, and component III comprises implementation management and support to the Ministry of Energy to strengthen capacity in key project management functions.

Project implementation has been delayed by about 18 months due to delays in the start-up of project implementation and the outbreak of the Ebola Virus Disease (EVD) in 2014. The project has also experienced cost increases particularly for project management support which are a result of the delays in implementation, and in compensation for project affected people (PAPs) impacted by the Freetown upgrade contract. As a result, this restructuring is proposing to eliminate the rural electrification pilot program (component II) and reallocate proceeds to components I and III to cover cost increases. This restructuring is also proposing to extend the closing date of the project by 18 months, from October 31, 2015 to April 30, 2017 to allow for the remaining activities, which are critical for achieving the proposed new PDO, to be implemented.

4. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

The key elements of the Freetown upgrade, financed under component I include (i) an increase of distribution capacity from 11kV to 33kV from the Blackhall to Wellington substation (about 7.9 km) (ii) replacement of 54 towers and (iii) a new substation at Ropotee with an associated access road. This existing 33kV/11kV distribution line is located in the Freetown Western Capital Area which is densely populated with commercial activities and slum settlements. Businesses and residences within the right-of-way (RoW) of the distribution upgrade route will thus be impacted in varying degrees.

An initial RAP Completion Report was disclosed in November 10, 2011 under the Sierra Leone Power and Water Project. Compensation payments for 29 households along the distribution line were finalized in October 2011 as well as the implementation of five livelihood restoration programs provided for small enterprises. However unfinished segments of the 11kV network between the Blackhall Road and Wellington sub-stations was restructured to be covered under the Energy Access Project for completion of rehabilitation work. In February 2012 a site inspection of the right-of-way (RoW) of the distribution upgrade route was undertaken. Further site inspections were undertaken as part of appraisal of the project. The site inspections concluded that while compensation had been paid to PAPs in 2011, most of the relocations had not taken place. Furthermore, more people had moved into the RoW and new structures had been built.

An updated RAP was prepared in 2012. However, this RAP was never implemented. A social audit of the previous RAP implementations against the relevant local legislation and World Bank standards was completed in July 2015. The findings of the social audit confirmed 122 PAPs of which 22 would need to be permanently relocated. The recommendations from the social audit are being implemented, including intensive consultations with PAPs, and an ARAP being finalized for re-disclosure by December 2015. A new cut-off date, January 31, 2015, was established and disclosed in May 2015. The contract for the Freetown upgrade has been signed but no civil works can commence until

compensation has been paid and clearing of land taken place. It is expected that compensation payments will be completed by end of November 2015 to allow for land clearing and civil works to commence in February 2016.

5. Environmental and Social Safeguards Specialists on the Team

Franklin Kuma Kwasi Gavu (GENDR)

Gloria Malia Mahama (GSURR)

6. Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	An Environment and Social Impact Assessment (ESIA) was completed and covered the areas where rehabilitation and upgrading of the existing distribution line and substations will take place. Guidance on control of pollution and waste management, especially in the substations is included in the ESIA.
Natural Habitats OP/BP 4.04	No	The distribution line and substations will not pass or even be close to any protected areas or critical habitat, including those with any high biodiversity.
Forests OP/BP 4.36	No	The distribution line and substations will not pass through any forested areas hence no impacts on forests are expected.
Pest Management OP 4.09	No	No herbicides or pesticides will be used in the maintenance of the right of way of the distribution line.
Physical Cultural Resources OP/BP 4.11	No	There are no known physical cultural resources in the project area. The project does not entail large excavations or movement of earth and hence no chance finds are anticipated.
Indigenous Peoples OP/BP 4.10	No	There are no indigenous people expected to be present in the project area.
Involuntary Resettlement OP/BP 4.12	Yes	A RAP Completion Report was disclosed in November 2011 for the Blackhall to Wellington distribution line under the Sierra Leone Power and Water Project, which is covered under this Project for completion of rehabilitation work. During preparation, the status of the RoW for this segment of the distribution line was assessed. It was found that previously compensated

		project affected persons (PAPs) did not relocate and new other “encroachers have moved inside the RoW. A social audit of the previous RAP implementation was commissioned and completed in August 2015. The audit report confirmed about 122 PAPs will be affected. Recommendations from the social audit are being implemented and an RAP is being finalized for re-disclosure by December 2015 before civil works can commence.
Safety of Dams OP/BP 4.37	No	The project does not entail construction of dams, nor relies on dam structures.
Projects on International Waterways OP/BP 7.50	No	The project will not affect international waterways.
Projects in Disputed Areas OP/BP 7.60	No	The project is not located in a disputed area.

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

<p>1. Describe any safeguard issues and impacts associated with the Restructured project. Identify and describe any potential large scale, significant and/or irreversible impacts:</p> <p>No new safeguards issues will be associated with this restructuring other than those identified during concept stage and confirmed during appraisal. The application of safeguards policies (OP4.01 Environment Assessment and OP4.12 Involuntary Resettlement) primarily concern the areas surrounding the existing distribution line which includes 33kV upgrade of the line from Blackhall Road to Wellington substations. This existing 33kV/11kV distribution line is located in the Freetown Western Capital Area which is densely populated with commercial activities and slum settlement for which the project will take into account to ensure that repairs and rehabilitation works are conducted in an appropriate manner and consistent with the guidelines defined in the ESIA. A social audit was commissioned to review the status of project affected persons (PAPs) who were allowed by GoSL to remain within the ROW and the new “encroachers”. The results of this assessment indicated that about 122 PAPs will be impacted.</p> <p>Given these anticipated impacts, the project is classified as category B (partial environmental assessment).</p>
<p>2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:</p> <p>Removing critical distribution capacity bottlenecks along Freetown distribution network will enable expanded, stable and more reliable electricity supply to Freetown residents. This is anticipated to improve social and economic activities. On the other hand, communities living in and around the RoW of the distribution line and in the perimeter of the substations to be rehabilitated under the project may expect to receive electricity services, which are not at a direct output of the project. These expectations will continue to be managed by the project and under ongoing community development programs through intensive communication and consultations.</p>

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

The routing of the distribution line in the Freetown area was set up several decades ago and the distribution facilities to be rehabilitated under the project are already existing and there is no plan to move them to alternate sites. Nonetheless under the Power and Water project, some of the transmission line towers were relocated to minimize the impact of the line on the settlements. The heights of the towers or span above the settlements were also increased, as an additional safety measure. Although the routing several decades ago was designed to avoid densely populated areas, today the RoW is occupied by slum settlements. The project will continually take into account the existing physical conditions and ensure that appropriate measures outlined in the ESIA and RAP are conducted appropriately to minimize any adverse impacts.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

Following site verification in February 2012, a social audit of the previous RAP implementations against the relevant local legislation and World Bank standards was completed in July 2015. The recommendations from the social audit are being implemented, including intensive consultations with PAPs, and an ARAP being finalized for re-disclosure. A new cut-off date was established and an inter-ministerial committee has been specifically set up for monitoring the RoW of distribution lines in urban areas and ensuring that encroachments are controlled.

An Environment and Social Impact Assessment (ESIA) has been prepared and describes the criteria and procedures that the project should follow to help ensure compliance with the World Bank's, as well as national, environmental and social standards. Guidance on control of pollution and waste management, especially in the substations is included in the ESIA. The ESIA also identifies the institutional roles and responsibilities, capacity building, and budget requirements to effectively implement these measures.

The PMU established at the MoEWR is largely staffed with personnel who worked on the Bumbuna project and have experience with safeguards issues through previous World Bank-supported projects. The PMU includes a qualified environmental and social development specialist to oversee environmental and social management. A safeguard training program was sponsored by the Ministry of Finance and Economic Development (MoFED) in March 2012 and conducted by the Bank's Accra-based safeguards team. Nonetheless, the project is planning substantial safeguards-related capacity-building, including training on the project cycle with roles and responsibilities. A high priority will be safeguards-related training for EDSA (including the staff responsible for civil works) to support implementation.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

Consultations on ESIA and RAPs were undertaken with different stakeholders, including environmental government agencies, local civil society groups, and community leaders. The ESIA results were presented and discussed in several consultations with government and non-government representatives.

The project also has designed a stakeholder engagement plan and is undertaking intensive consultations with PAPs and other stakeholders. A grievance Redress Mechanism is functional to receive feedback and address complaints.

The initial safeguards documents were all disclosed in-country and at the info shop. All updated

documents and reports stemming from the restructuring will be made available to project affected groups, local NGOs, and the public at large as required by the laws of Liberia and the World Bank safeguards policies.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other	
Date of receipt by the Bank	16-Jul-2012
Date of submission to InfoShop	26-Sep-2012
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
"In country" Disclosure	
Sierra Leone	26-Sep-2012
<i>Comments:</i>	
Resettlement Action Plan/Framework/Policy Process	
Date of receipt by the Bank	19-Apr-2004
Date of submission to InfoShop	10-Aug-2004
"In country" Disclosure	
Sierra Leone	23-Aug-2004
<i>Comments:</i>	
If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.	
If in-country disclosure of any of the above documents is not expected, please explain why:	

C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment			
Does the project require a stand-alone EA (including EMP) report?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
OP/BP 4.12 - Involuntary Resettlement			
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	NA <input type="checkbox"/>
Is physical displacement/relocation expected?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	TBD <input type="checkbox"/>
Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	TBD <input type="checkbox"/>
The World Bank Policy on Disclosure of Information			

Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
All Safeguard Policies	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have costs related to safeguard policy measures been included in the project cost?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

III. APPROVALS

Task Team Leader(s):	Name: Carol A. Litwin	
<i>Approved By:</i>		
Safeguards Advisor:	Name: Johanna van Tilburg	Date:
Practice Manager/Manager:	Name: Meike van Ginneken	Date: