

Republic of Sierra Leone



Ministry of Energy & Energy Distribution and Supply Authority

Enhancing Sierra Leone Energy Access Project (P171059)

Draft

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

November 14, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Sierra Leone (the **Recipient**) will implement the Enhancing Sierra Leone Energy Access Project (the **Project**), with the involvement of the Ministry of Energy (MOE) and the Electricity Distribution and Supply Authority (EDSA). The International Development Association (the **Association**) has agreed to provide financing for the Project.
2. The Recipient 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 Recipient 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 Management Plans (ESMP), Resettlement Action Plans (RAP), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. The Recipient 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 in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the Recipient, 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 Recipient or MOE will agree to the changes with the *Association* and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through an exchange of letters signed between the Association and the Recipient or MOE. The Recipient or MOE will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts that are relevant to the Project, such as environmental, health, and safety impacts, labor influx, gender-based violence.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<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 documents required under the ESCP, corrective and preventive measures taken or required to be taken to address such conditions, stakeholder engagement activities, functioning of the grievance mechanism..</p>	<p><i>Quarterly after effectiveness and throughout Project implementation</i></p>	<p><i>Component 1: EDSA Component 2: MoE Component 3 (a): MoE Component 3 (b): EDSA</i></p>
B	<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 but not limited to incidents involving fatalities or serious bodily harm and incidents such as fire injuries, physical violence, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), construction accident, communicable diseases and infections. The notification will include as much detail as is available at the time of notification concerning the incident or accident, indicating immediate measures taken to address it, and including information provided by any contractor and supervising entity, as appropriate.</p> <p>Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p><i>Notification to the Association within 48 hours after learning of the incident or accident.</i></p> <p><i>Subsequent incident report submitted within a timeframe acceptable to the Association.</i></p>	<p><i>Component 1: EDSA Component 2: MoE Component 3 (a): MoE Component 3 (b): EDSA</i></p>
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Require contractors to provide monthly monitoring reports, including on ESHS issues, to MOE/EDSA. Submit those reports to the Association upon request.</p>	<p><i>Monthly reports to the MOE/EDSA. Submission to the Association upon request.</i></p>	<p><i>Component 1: EDSA Component 2: MoE Component 3 (a): MoE Component 3 (b): EDSA</i></p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

<p>1.1</p>	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain project Management unit (PMU) at MOE and Health, Safety, Social and Environment unit (HSSE) at EDSA with qualified staff and resources to support management of E&S risks at each implementing agency in accordance with the following terms.</p> <p><u>For Project Components 2 and 3(a):</u> The existing Project Management Unit (PMU) for the Energy Sector Utility Reform Project (ESURP), which is also financed by the World Bank, may be used.</p> <p>MOE shall build on the ESURP PMU by maintaining an organizational structure with the following specialists:</p> <p>(i) a procurement specialist; (ii) a contract management specialist; (iii) a financial management specialist; (iv) engineer(s) specialized in renewable energy; (v) an environmental and safeguard specialist (with expertise in SEA/SH risks and impacts); (vii) a monitoring and evaluation specialist; and (viii) a communications specialist (with expertise in stakeholder engagement),</p> <p><u>For Project Components 1 and 3(b):</u> EDSA currently has a Project Management Team (PMT) that is implementing the investment component of ESURP.</p> <p>EDSA shall build on the ESURP PMT by maintaining an organization structure with the following specialists:</p> <p>(i) a procurement specialist; (ii) a contract management specialist; (iii) a financial management specialist; (iv) engineer specialized in renewable energy; (v) an environmental safeguard specialist; (vi) a social and gender specialist (with expertise in SEA/SH risks and impacts; (vii) a monitoring and evaluation specialist; and (viii) a communications specialist (with expertise in stakeholder engagement),</p> <p>The PIUs shall be supported by experienced consultants to assist in project implementation and in building the capacity of the regular EDSA staff.</p>	<p><i>Unless otherwise agreed in writing with the Association, fully functional PIUs (with full complement of staff) must be established not later than three (3) months from the Effective Date or any later date as may be agreed with the Association.</i></p>	<p>MOE & EDSA</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Project activities will be screened and assessed for environmental and social (E&S) risks and impacts in accordance with the ESSs and the Environmental and Social Management Framework (ESMF) and Resettlement Framework (RF) prepared for this Project, in a manner acceptable to the Association. Based on the screening and assessment results, detailed environmental and social assessments shall be conducted, as required based on the nature and scale of the activity and its potential environmental and social risks and impacts. ESMPs, RAPs and such other E&S instruments as this ESCP requires shall be developed and implemented to address any risks identified during the process. This screening, assessment, and mitigation process shall be comprehensive to address waste management and pollution, labor, SEA/SH risks, social diversity and gender, and impacts on vulnerable and disadvantaged groups or individuals, among other relevant risks and impacts.</p>	<p><i>Throughout Project implementation</i></p>	<p><i>Component 1: EDSA Component 2: MoE Component 3 (a): MoE Component 3 (b): EDSA</i></p>

<p>1.3</p>	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>a. Prepare, adopt, disclose, and implement a Stakeholder Engagement Plan (SEP), Environmental and Social Management Framework (ESMF) and a Resettlement Framework (RF) in a manner acceptable to the Association. The ESMF shall include Screening Forms to be used to screen all sub-projects to determine whether ESIA, ESMPs, RAPs, and other E&S instruments must be prepared and implemented prior to sub-project implementation.</p> <p>b. Secure environmental permits for all new construction and rehabilitation under the Project.</p> <p>c. Prepare, disclose, adopt, and implement an ESMP, RAP and/or any other E&S instruments required for the respective subproject activities, based on the assessment process, in accordance with the ESSs, the ESMF, the EHSGs, and other relevant Good International Industry Practice (GIIP) in a manner acceptable to the Association.</p> <p>d. Project Implementation Manual: Include the E&S requirements into the Project Implementation Manual. At the minimum, the Manual will describe:</p> <ul style="list-style-type: none"> • The roles of Environment and Social (E&S) officers • The minimum E&S clauses to be included in the Terms of Reference and tender documents • Incorporation of E&S indicators into Monitoring and Evaluation system • Completion timeline 	<p>a. <i>ESMF, SEP, RF will be approved by the Association prior to appraisal.</i></p> <p>b. <i>Throughout Project implementation. No construction or rehabilitation may begin before required permits are obtained.</i></p> <p>c. <i>Throughout Project implementation. No works may begin before ESMPs, RAPs and other E&S instruments are in place.</i></p> <p>d. <i>Manual to be completed by Project effectiveness and implemented throughout Project implementation.</i></p>	<p><i>Component 1: EDSA Component 2: MoE Component 3 (a): MoE Component 3 (b): EDSA</i></p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Manage contractors and subcontractors to ensure that they comply with the ESSs and this ESCP. Incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors, subcontractors, and supervising firms comply with the ESHS specifications of their respective contracts.</p> <p>Ensure in particular that:</p> <ul style="list-style-type: none"> • Codes of conduct are required of contractors and subcontractors and their workers to prohibit sexual harassment and exploitation and training of workers on their obligations under the Code of conduct • Contractor ESMP (C-ESMP) is costed, with sufficient budget to mitigate E&S risks • Contractor and subcontractor commitment and compliance with the ESSs and this ESCP is monitored • Contractors provide details on contractor’s oversight on environmental, social, health and safety (ESHS) performance • Contractor develops a grievance redress mechanism to handle concerns of their personnel, consistent with ESS2. 	<p><i>Integration of E&S provisions prior to issuing of procurement documents</i></p> <p><i>Supervision of contractors and subcontractors throughout Project implementation.</i></p>	<p><i>Component 1: EDSA</i> <i>Component 2: MoE</i> <i>Component 3 (a): MoE</i> <i>Component 3 (b): EDSA</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.5	<p>THIRD PARTY MONITORING</p> <p>Independent third-party monitoring agent(s) shall be appointed prior to construction commencement under the Project. The PIUs (EDSA and MOE) shall share Project monitoring reports with the third-party monitoring agents for validation. These reports will outline safeguard compliance using site-specific ESMPs/ESIAs and RAPs if prepared.</p> <p>The independent third-party monitors shall check:</p> <ul style="list-style-type: none"> (i) whether the ESMF is being correctly adhered to; (ii) whether appropriate mitigation measures have been identified and implemented effectively in accordance with this ESCP and whether these need to be adjusted to reflect changing circumstances and; (iii) the extent to which all stakeholder groups are involved in sub-project implementation. <p>The third-party monitoring reports shall be submitted to the Association as part of the Recipient’s reporting under Section A of this ESCP.</p>	<p><i>At least semi-annually throughout Project implementation</i></p>	<p><i>Component 1: EDSA Component 2: MoE Component 3 (a): MoE Component 3 (b): EDSA</i></p>
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Develop, adopt, and disclose Labor Management Procedures (LMP) for the Project as part of the ESMF, consistent with ESS 2 and national law.</p> <p>The LMP shall set out the way in which Project workers will be managed, in accordance with the requirements of Sierra Leone national laws and ESS 2. The LMP shall address the way in which ESS 2 will apply to different categories of Project workers including, inter alia, implementing adequate occupational health and safety measures, setting out grievance arrangements for project workers, and requirements for contractors to manage their workers. The LMP shall be referenced in the ESHS specifications of the procurement documents with obligations for contractors to comply with its requirement.</p>	<p><i>Labor Management Procedures will be part of ESMF that will be prepared and submitted to the Association for approval before appraisal.</i></p> <p><i>Apply these Procedures throughout Project implementation.</i></p>	MOE & EDSA
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a Project GRM which shall be available to Project workers, including PMU and HSSE staff, as described in the LMP and consistent with ESS2. This shall be approved by the PIUs and the Association.</p>	<p><i>Grievance mechanism to be operational prior to recruitment of workers and implemented throughout Project implementation.</i></p>	MOE & EDSA
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMPs.</p> <p>Ensure that contractors also prepare OHS plans, as part of Contractor ESMPs (C-ESMPs), before their mobilization for approval by PIU.</p>	<p><i>Prior to implementation of the ESMPs and C-ESMPs.</i></p> <p><i>Maintained throughout Project implementation</i></p>	MOE & EDSA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE</p> <p>a. Prepare, adopt and implement Project emergency preparedness and response plan. The Project emergency preparedness and response plan shall be approved by the Association.</p> <p>b. Require contractors to adopt, implement, and update as necessary emergency preparedness and response protocols consistent with the MOE/EDSA Project emergency plan. These contractor plans shall be approved by the PMU and HSSE and the Association.</p> <p>c. Require contractors to regularly complete safety drills for workers, and emergency preparedness training in accordance with the governing emergency preparedness and response plan.</p>	<p>a. Before construction commencement and maintained throughout Project implementation</p> <p>b. Prior to contractor mobilizing to site and maintained throughout Project implementation</p> <p>c. Throughout Project implementation</p>	<p>a. MOE and EDSA</p> <p>b. Component 1: EDSA Component 2: MoE Component 3 (a): MoE Component 3 (b): EDSA</p> <p>c. MOE, EDSA, Contractors</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN:</p> <p>a. Assess potential solid, hazardous, non-hazardous and electronic waste that will be generated from this Project. Subsequently, prepare, adopt, and implement a comprehensive Waste Management Plan consistent with ESS3.</p> <p>b. Each sub-project ESMP shall assess and incorporate a sub-project Waste Management Plan based on the comprehensive Waste Management Plan.</p>	<p>a. Before construction commencement and subject to review and approval by the Association.</p> <p>b. Plan to be adopted before sub-project works begins and implemented throughout sub-project implementation.</p>	<p>a. MOE, EDSA</p> <p>b. Contractors</p>
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Resource efficiency and pollution prevention and management measures to be adopted under the ESMP to be prepared under action 1.3 above.</p>	<p>Throughout Project implementation</p>	<p>MOE and EDSA</p>

ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY:</p> <p>Require Project contractors to develop and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed under action 1.3 above.</p>	<i>Throughout Project implementation</i>	<i>MOE and EDSA</i>
4.2	<p>COMMUNITY HEALTH AND SAFETY:</p> <p>a. The Project ESMF shall require the contractors to develop and include in the sub-project ESMPs adequate measures and actions to assess and manage risks and impacts specific to the community and beneficiary arising from Project activities. These will include, inter alia, measures to minimize the potential for community exposure to the COVID-19 disease, accidents and pollution, abuse by Project workers, risks of labor influx, accidents and other emergencies (e.g., a fire response or natural disaster), sexual exploitation and abuse, sexual harassment. These measures will include mechanisms to protect individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, and ensure access to the development benefits resulting from the Project.</p> <p>b. Ensure that contractor measures, and work methods are validated by the local authorities and approved by the PMU and HSSE.</p>	<p><i>a. Same timeframe for the preparation and implementation of ESMPs and maintained throughout Project implementation</i></p> <p><i>b. Prior to start of works</i></p>	<p><i>a. MOE, EDSA and Contractors</i></p> <p><i>b. MOE, EDSA, Contractors and Local Authorities</i></p>

<p>4.3</p>	<p>GBV AND SEA RISKS:</p> <p>a. Project to hire a local NGO to assist in GBV risk prevention and response. Through a Project GBV Action Plan, develop and implement measures and actions to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA) related to the Project. The GBV Action Plan shall be made available to the public, including to make community members aware of Project risks and reporting mechanisms.</p> <p>b. Workers and communities shall be sensitized through frequent toolbox talks and community consultations.</p>	<p><i>a. Submit the GBV Action Plan for the Association’s approval before the preparation of the procurement documents. Once approved, implement Plan throughout Project implementation</i></p> <p><i>b. Prior to start of works and throughout Project implementation</i></p>	<p>a. EDSA and MOE</p> <p>b. EDSA, MOE and contractors</p>
<p>4.4</p>	<p>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:</p> <p>a. Each sub-project ESMP shall include a GBV Action Plan for addressing GBV and SEA risks based on the Project GBV Action Plan prepared under 4.3 above. This Plan shall include worker-related codes of conduct to be integrated in the LMPs. Additional measures shall be developed as necessary during Project implementation.</p> <p>b. Ensure that contractors require workers to strictly abide by the measures and workers code of conducted.</p>	<p><i>a. GBV Action Plan to be in place by contractor mobilization to site and maintained throughout Project implementation</i></p> <p><i>b. Throughout Project implementation</i></p>	<p>a. EDSA, MOE and Contractors</p> <p>b. EDSA, MOE and Contractors</p>
<p>4.5</p>	<p>SECURITY PERSONNEL: No security personnel may be employed on the Project without the prior written consent of the Association.</p>		

ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

5.1	<p>RESETTLEMENT PLANS:</p> <p>Prepare, adopt, and implement resettlement plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF) that has been prepared for the Project, and thereafter adopt and implement the respective RAPs before carrying out the associated activities, in a manner acceptable to the Association.</p>	<p><i>Resettlement Action Plans to be submitted for the Association's approval, and once approved, implemented before Project activities involving land acquisition and resettlement may commence.</i></p>	<p><i>EDSA, MOE and Contractors</i></p>
5.2	<p>MONITORING AND REPORTING ON RESETTLEMENT IMPLEMENTATION</p> <p>Prepare and submit to the Association regular monitoring reports on the implementation of resettlement activities, including status of preparation and implementation of resettlement documents required under the ESCP, PAP engagement activities, functioning of resettlement related grievance mechanisms.</p>	<p><i>Submit Quarterly reports no later than the last day of each quarter.</i></p> <p><i>Throughout Project implementation</i></p>	<p><i>MOE and EDSA</i></p>
<p>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</p>			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p> <p>a. Include in the ESMF procedures for screening project activities that may pose risks to biodiversity, in accordance with ESS6.</p> <p>b. If required, prepare, adopt, and implement as part of ESMPs biodiversity protection measures, including as appropriate a stand-alone Biodiversity Management Plan, in accordance with ESS6 and the ESMF, and in a manner acceptable to the Association.</p>	<p><i>a. Throughout Project implementation</i></p> <p><i>b. Submit for the Bank's prior approval prior to initiation of activity that may affect biodiversity. Once approved, the plan shall be implemented throughout Project implementation.</i></p>	<p>a. MOE and EDSA</p> <p>b. MOE and EDSA</p>
<p>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</p>			
7.1	<p>INDIGENOUS PEOPLES PLAN: Not relevant. There are no distinct social and cultural groups in the Project area who exhibit characteristics meeting the criteria for indigenous or traditionally under-served communities as spelled out in the ESS7.</p>	<p><i>Not relevant</i></p>	<p>Not relevant</p>

ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS: Identify cultural heritage sites prior to construction. Prepare and implement a Chance Find Procedure to guide treatment of impacted cultural heritage resources. Relevant aspects of this standard shall be integrated, as needed, under action 1.3 above. A Chance Find procedure will be part of the ESMF.</p>	<i>Throughout Project implementation</i>	<i>MOE, EDSA and Contractors</i>
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ESMS: Not relevant	<i>Not relevant</i>	<i>Not relevant</i>
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare, disclose, adopt, and implement the Stakeholder Engagement Plan (SEP) prepared for the Project.</p>	<i>Draft SEP to be finalized prior to appraisal and implemented throughout Project implementation.</i>	<i>MOE and EDSA</i>
10.2	<p>PROJECT GRIEVANCE MECHANISM:</p> <p>Develop, maintain, and operate a Project level grievance mechanism (GM) to receive and address complaints related to the Project, including but not limited to those related to resettlement, consistent with ESS10. The GM shall be described in the RPF, RAPs and SEP. The GM will incorporate digital platforms and existing GRM systems in place at the MOE/EDSA and the local level.</p>	<i>Grievance Mechanism to be operationalized by Project effectiveness and maintained throughout Project implementation</i>	<i>MOE and EDSA</i>
CAPACITY SUPPORT (TRAINING)			

<p>CS1</p>	<p>Based on E&S Capacity Assessment, the following types of training will be provided to the relevant target groups, such as PIU staff, stakeholder community, project workers, consultants, contractors, sub-contractors:</p> <ul style="list-style-type: none"> • Orientation training to staff of EDSA, PIU and MOE on the World Bank ESF and its implementation modality (screening, scoping etc.) • Training to EDSA and MOE PIU staff on <ul style="list-style-type: none"> ▪ Issues of Land acquisition and involuntary resettlement, ▪ Issues of vulnerable and disadvantaged people and about Free Prior Inform Consent (FPIC), ▪ ESIA and RAP ▪ Occupational health and safety, community health and safety, (including emergency prevention, preparedness and response arrangements), ▪ GBV/SH/SEA awareness, prevention, reporting and management protocols ▪ Waste management, ▪ Labor Management Plan and related procedures, ▪ Cultural heritage management ▪ Traffic and road safety, ▪ Consultant Procurement and Contract Management, ▪ Management of Construction Impacts ▪ Additional training will be identified during Project implementation 	<p><i>Annual training plan shall be submitted to the Association for approval to guide training and capacity building. All staff must complete the trainings and refreshers on the timeframes specified in the annual plan.</i></p>	<p><i>MOE, EDSA and External Consultant(s)</i></p>
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