

**GOVERNMENT OF SIERRA LEONE**

**Ministry of Finance**

**Resilient Urban Sierra Leone Project [P168608]**

**ENVIRONMENTAL & SOCIAL  
COMMITMENT PLAN**

**March 25, 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Sierra Leone (**GoSL** or **Recipient**) is implementing the Resilient Urban Sierra Leone Project (the **Project**) with the involvement of various cities and municipal councils of Sierra Leone, the Ministry of Local Government, and the National Disaster Management Agency. The International Development Association (hereinafter the **Association**) is providing financing for the Project.
2. GoSL shall implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**) of the World Bank. 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. GoSL shall 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 Framework (ESMF), Environmental and Social Impacts Assessments (ESIA), Environmental and Social Management Plans (ESMP), Resettlement Framework, Resettlement Action Plans (RAP)/ Livelihood Restoration Plans (LRP), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. GoSL is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by any ministry, agency, local government units referenced in 1. above or another entity.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by GoSL 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 GoSL, 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, GoSL, through such authorized delegates as it may designate, 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 the exchange of letters signed between the Association and the GoSL, through such authorized delegates as it may designate. The GoSL, through such authorized delegates as it may designate, shall 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 GoSL shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts, labor influx, gender-based violence.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>The supervising engineer shall be required to conduct daily monitoring and submit monthly Environmental, Social, Health and Safety (ESHS) report to the Project Management Unit (PMU). Parallel E&amp;S supervision report from the Local Council Environmental and Social Officers (ESOs) shall be submitted to the PMU.</p> <p>Ministry of Finance (MoF) through the PMU, shall prepare and submit quarterly monitoring reports on the ESHS performance of the Project to the Association. The reports shall, among other elements, include (i) status of implementation of the ESCP; (ii) conditions, if any, which interfere or threaten to interfere with the implementation of the ESCP; and (iii) corrective and preventive measures taken or required to be taken to address such conditions (iv) stakeholder engagement activities and functioning of the grievance mechanism.</p> <p>The PMU shall establish an electronic or digital tool to facilitate reporting from Project sites to the PMU.</p>	<p><i>Quarterly throughout Project implementation.</i></p>	<p><i>MoF (Fiscal Decentralization Division) through the PMU shall be responsible for funding and submitting ESHS performance report for review and discussion to the Association, in a manner satisfactory to the Association.</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Recipient shall promptly notify the Association of any incident or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including but not limited to fatalities or instances of serious bodily harm, fire injuries, physical violence, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), car accidents, communicable diseases, and infections.</p> <p>The Recipient’s report to the Association shall include full detail of the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate. 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 should take place within 48 hours and shall occur no later than 72 hours after becoming aware of the incident or accident.</i></p> <p><i>Report to be prepared and submitted to the Association on timeframe specified by the Association.</i></p>	<p><i>Overall responsibility rests with MoF (Fiscal Decentralization Division)</i></p>
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>Require and ensure that contractors provide monthly monitoring reports, including procurement report, to the PMU. These reports shall also be submitted to the Association upon request.</p>	<p>The reports shall be submitted to the PMU monthly, and to the Association upon request.</p>	<p><i>MoF (Fiscal Decentralization Division) through the PMU</i></p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Building on the project management unit that was established for the implementation of the Project Preparation Advance (PPA), Recipient shall maintain a Management Unit for the Project (PMU) with an EHS unit with qualified E&amp;S experts, including one Environmental Specialist, one Social Specialist, one Gender and GBV Specialist, and one community/stakeholder Engagement Specialist (together, the “E&amp;S Specialists”). These E&amp;S Specialists shall be responsible for managing the E&amp;S risks of the Project and ensuring that the Project is implemented in accordance with this ESCP. The E&amp;S Specialists shall be supported by the local council Environment and Social Officers and engineers at the Regional and District levels (in each targeted district) to implement the Project and adequately resourced (with computers and accessories, transportation and stipends). The PMU shall also hire external expertise and consultancy services as necessary to ensure that the Project is implemented in accordance with this ESCP. This organizational structure shall be maintained throughout Project implementation. At the community levels, the existing Ward Development Committees structure shall remain the structures for Project interface with the communities and shall be involved in community mobilization and planning as appropriate.</p>	<p><i>PMU has been established and hiring of E&amp;S Specialists completed. The specialists shall be maintained throughout Project implementation.</i></p>	<p><i>The MoF shall maintain and strengthen the PMU as necessary.</i></p>

<p>1.2</p>	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>An Environmental and Social Management Framework (ESMF) has been prepared for the Project through independent consultancy services. It contains preliminary E&amp;S assessment of the landfill and neighborhood upgrading sites. Subprojects shall be screened for Environmental and Social risks and impacts in accordance with the procedures of the ESMF and the ESSs, in a manner acceptable to the Association. Based on the screening results, detailed environmental and social assessments shall be conducted and corresponding, site-specific ESIA's and/or ESMPs shall be prepared, disclosed, adopted, and implemented to address any risks identified during the process, in accordance with the ESMF and ESSs, and in a manner acceptable to the Association. All ESIA's shall be comprehensive to include assessment of waste management and pollution, Labor influx, SEA/SH risk assessment, social diversity and gender, impacts on vulnerable and disadvantaged groups or individuals, etc., and preparation of a draft ESMP, Labor Management Procedures (LMP) and SEA/SH Action Plan.</p> <p>Full Environmental and Social Impact Assessments (ESIA) for the construction of the new landfill and one ESIA for the neighborhood upgrade interventions shall be prepared, disclosed, adopted, and implemented. No disbursement shall be made for the construction of the new landfill in the Western Area Rural District, until (i) a site for the construction of the landfill in Western Area Rural District is secured/selected on the basis of environmental and social assessments satisfactory to the Association, and (ii) receipt by the Association of all required ESIA and RAP for the said landfill site, in form and substance satisfactory to the Association.</p> <p><b>CONTINGENT (EMERGENCY) RESPONSE FINANCING</b></p> <p>Develop, adopt, and implement CERC-ESMF that includes a description of the ESHS assessment and management arrangements and procedures for the activation and implementation of the CERC under the Project in accordance with the ESSs.</p>	<p><i>ESMF has been finalized, cleared, consulted on and disclosed. ESMF shall be implemented throughout Project implementation.</i></p> <p><i>Screening of subproject activities for E&amp;S risks shall be conducted prior to commencing of the relevant sub-project activities.</i></p> <p><i>Preparation, disclosure, consultation, and adoption of all ESIA's and/or ESMPs shall take place before the start of subproject works.</i></p> <p><i>ESIA for Western Area Rural District shall be prepared once interventions have been identified and shall be finalized and approved by the Association before disbursement for Project Component 2.2 may begin.</i></p> <p><i>The CERC ESMF shall be prepared no later than 60 days post Project Effectiveness and thereafter applied to CERC activities when triggered. Implement the measures and actions</i></p>	<p><i>MoF (Fiscal Decentralization Division) PMU to supervise the preparation of ESF documents. Funding for consultancy services shall be covered by the Project.</i></p> <p><i>MoF (Fiscal Decentralization Division) PMU, Office of the National Security (ONS)</i></p>
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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
<p>Thereafter prepare, disclose, consult, adopt, and implement any environmental and social (E&amp;S) management plans or other instruments required for the respective CERC activities in accordance with the ESSs, CERC-ESMF, the World Bank Group Environmental, Health and Safety Guidelines (EHSGs), 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&amp;S management plans or instruments, within the timeframes specified in the plans.</p>	<p><i>required under the CERC E&amp;S management plans or instruments, within the timeframes specified in the plans.</i></p>	

<p>1.3</p>	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Screen any proposed subproject in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and, thereafter, draft, disclose, consult, adopt, and implement the subproject Environmental and Social Management Plan (ESMP), as required by the ESMF and ESSs, in a manner acceptable to the Association.</p> <p>The GoSL shall:</p> <ul style="list-style-type: none"> <li>a. Develop disclose and implement an Environmental and Social Management Framework (ESMF) including Labor Management Procedures (LMP), Stakeholder Engagement Plan (SEP), and Resettlement Policy Framework (RPF) satisfactory to the Association.</li> <li>b. Subsequently during project implementation, use the subprojects Screening Forms and Impacts Checklist Forms of the ESMF to screen all subprojects to determine and comply with requirements for follow-up E&amp;S instruments, including ESIA, ESMPs, RAPs, Biodiversity Management Plans (BMPs), and Livelihood Restoration Plans (LRP). The ESMF shall include prescreening of subproject activities. If it is determined for these subproject activities that critical biodiversity is likely to be impacted, then a standalone BMP shall be prepared and implemented. The RPF shall determine the preparation of follow-up RAPs and LRPs.</li> <li>c. Prepare, disclose, adopt and implement Environmental and Social Management Plans (ESMPs), Resettlement Action Plans and LRPs required for the respective sub-project activities in accordance with the assessment process in the ESMF, the ESSs, the EHSs, the World Bank interim guidance for construction and stakeholder Engagement during COVID-19, Good practice note on SEA/SH in civil</li> </ul>	<p><i>Screening to be conducted and ESMPs adopted and implemented throughout Project implementation.</i></p> <p><i>a. The ESMF, RPF, and SEP have been completed, consulted on, cleared and disclosed, and shall be implemented throughout Project implementation.</i></p> <p><i>b. Screening shall be conducted as soon as sub-project locations are identified and before carrying out of such activities.</i></p> <p><i>c. Full ESIA, ESMP, RAP, LRP and BMP shall be prepared before commencement of construction and, in the case of the landfill, before disbursement under Component 2.2.</i></p>	<p><i>MoF (Fiscal Decentralization Division) through PMU E&amp;S Unit, and consultants. Funding from project budget.</i></p>
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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
<p>works and other relevant Good International Industry Practice (GIIP) including WHO guidelines on COVID-19 prevention. The ESMP shall comprise Environmental and Social Management and Monitoring, Emergency preparedness and response plan (including COVID-19 response plan), GBV Action Plan, Waste Management Plan, Occupational Health and Safety Plan, Community Health and Safety Plan, Traffic Management Plan, Closure or Decommissioning Plan.</p> <p>d. Prepare, adopt, and implement a Project Operations Manual that includes E&amp;S requirements consistent with this ESCP. The Project Operations Manual shall reflect, at a minimum:</p> <ul style="list-style-type: none"> <li>• The roles of E&amp;S Specialists</li> <li>• The minimum E&amp;S clauses to be included in the terms of reference and tender documents for contractors</li> <li>• Incorporation of E&amp;S indicators into monitoring and evaluation system</li> <li>• Completion timeline</li> </ul>	<p><i>d. Before carrying out of the relevant Project activities.</i></p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
1.4	<p><b>PERMITS, CONSENTS AND AUTHORIZATIONS</b></p> <p>Obtain or cause others to obtain the relevant permits, consents and authorizations that are applicable to the Project from relevant national authorities/agencies such as:</p> <ul style="list-style-type: none"> <li>• Environmental permits/licenses</li> <li>• Water use permits</li> <li>• Building/construction permits</li> <li>• Verifiable land title deeds</li> <li>• Land use rights/permits</li> <li>• Any other licenses, permits, consents and authorizations as and when required</li> </ul> <p>Comply or cause others to comply with the conditions established in these permits, consents and authorizations throughout Project implementation.</p>	<p><i>Permits, consents, and authorizations to be obtained prior to the initiation of relevant Project activities, and therefore complied with throughout Project implementation.</i></p>	<p>MoF (Fiscal Decentralization Division) /PMU E&amp;S specialist.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
1.5	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Manage and supervise contractors and subcontractors to ensure their compliance with the ESSs and the terms of this ESCP, including by integrating ESHS specifications into procurement documents and contracts and thereafter. These ESHS specifications shall include but not be limited to:</p> <ul style="list-style-type: none"> <li>• Relevant requirements included in contracts and subcontracts (reflecting ESSs and ESCP);</li> <li>• Codes of conduct (CoC) for contractors and subcontractors and their workers to prohibit sexual harassment and exploitation and training of workers on their obligations under the CoC;</li> <li>• Contractor to prepare a costed SEA/SH Action Plan as part of the contractor ESMP</li> <li>• Preparation of a contractor ESMP (C-ESMP) that is costed, with sufficient budget to mitigate E&amp;S risks</li> <li>• Monitor Contractor commitment and compliance</li> <li>• Ensure contractors provide details on contractor’s oversight on environmental, social, health and safety (ESHS) performance</li> <li>• Contractor to develop a grievance redress mechanism to handle concerns of their employees</li> <li>• Labor Management Plan to be developed by contractor based on the project Labor Management Procedure as part of the ESMF.</li> </ul>	<p><i>Include ESHS provisions in bidding and contractual documents for works prior preparation of procurement documents.</i></p> <p><i>Prepare C-ESMP before commencement of civil works.</i></p> <p><i>Supervise contractors throughout Project implementation.</i></p>	<p>MoF/PMU, PMU E&amp;S specialists, procurement officer.</p>
1.6	<p><b>THIRD PARTY MONITORING</b></p> <p>Third Party Monitoring: An independent consultant (firm) shall be appointed to monitor the implementation and compliance with the ESMPs (including contractor Labor Management Plan, GBV action Plan), RAPs, LRP, SEP, OHS plan, emergency. preparedness and response plan</p>	<p><i>TPM shall be hired no later than one month after Project Effectiveness to conduct baseline assessment upon hire and thereafter conduct monitoring once a year throughout Project implementation.</i></p>	<p>MoF (Fiscal Decentralization Division). PMU E&amp;S specialists shall ensure that the selected TPM consultant conduct the monitoring in a manner satisfactory to the PMU and the Association.</p>
<p><b>ESS 2: LABOR AND WORKING CONDITIONS</b></p>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>a. The Labor Management Procedures (LMP) developed for the Project shall be implemented throughout Project implementation. The LMP shall set out the way in which Project workers shall be managed, in accordance with the requirements of Sierra Leone national law and ESS 2. The LMP shall address the way in which ESS2 will apply to different categories of Project workers, including through implementing adequate occupational health and safety (OHS) measures, setting out grievance arrangements for Project workers and requirements for Project contractors to manage their workers</p> <p>b. The Labor Management Procedure shall be referenced in the ESHS specifications of the procurement documents with requirements for contractors to update into a Plan during implementation and comply with its requirement. It shall also require preparation of an OHS plan consistent with the World Bank Group's EHS Guidelines.</p>	<p>a. LMP has been prepared as part of ESMF and shall be implemented throughout Project implementation.</p> <p>b. ESHS specifications spelled out prior to the preparation of procurement documents. Contractor ESHS measures to be maintained throughout Project implementation.</p>	<p>MoF (Fiscal Decentralization Division)</p> <p>PMU E&amp;S specialists shall ensure that the selected contractor comply with these requirements.</p>
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish, maintain, and operate a grievance redress mechanism (GRM) for Project workers, including contractors, as described in the LMP and consistent with ESS2.</p>	<p>Grievance mechanism operational prior to recruitment of Project workers and implemented throughout Project implementation.</p>	<p>MoF and contractors</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>Require and ensure that contractors prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMP prepared under action 1.3 of this ESCP.</p> <p>Require and ensure that Project contractors abide by the approved occupational, health and safety (OHS) plan/measures. The OHS plan shall conform with GIIP, ESHS Guidelines as well as WHO country and technical guidance – coronavirus disease (COVID-19) documents for the prevention of the transmission of the COVID 19 infection. Contractor measures shall also be consistent with GoSL’s directive and policy on COVID 19.</p> <p>Contractor’s Health and safety officer and MoF E&amp;S specialists shall train/orientate employees of Project Contractors on various aspects of OHS relevant to the project.</p>	<p><i>OHS plans adopted prior to initiating construction in accordance with ESMP timeframe under 1.3 and implemented throughout Project life.</i></p>	<p>MoF/PMU/ E&amp;S Specialists/ Contractors</p>
2.4	<p><b>EMERGENCY PREPAREDNESS AND RESPONSE</b></p> <p>As part of the OHS measures specified above in 2.3, institute measures on Emergency Preparedness and Response, and ensure effective coordination with measures under 4.5., including ensuring that Project workers and contractors are trained on emergency preparedness and response and the implementation the relevant plan.</p>	<p><i>Prior to initiation of subprojects involving construction.</i></p> <p><i>Maintained throughout Project implementation</i></p>	<p>MoF (Fiscal Decentralization Division)/PMU E&amp;S specialist/ Contractors.</p>
2.5	<p><b>PROJECT WORKERS TRAINING</b></p> <p>Implement training programs for Project workers to improve awareness of environmental and social risks of the Project and to mitigate impacts on local communities, as defined in the LMP, ESMP/ESMPs and GBV action plan.</p>	<p><i>Training to be completed within one month of recruitment, with periodic refresher trainings thereafter throughout Project implementation.</i></p>	<p>MoF (Fiscal Decentralization Division)/PMU E&amp;S specialist. Funding from Project budget</p>
<p><b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Resource efficiency and pollution prevention and management measures shall be addressed in the ESMPs to be prepared under action 1.3 above, in accordance with ESS3 and in a manner satisfactory to the Association. These measures shall account for and mitigate, among other risks, air pollution, noise, and land and water pollution. In addition, a Traffic Management Plan, Emergency Response Plan (ERP), Hazardous Waste Management Plan shall be prepared to mitigate and manage the anticipated risks.</p> <p>The ESMF shall provide the framework for the assessment and management of E&amp;S risks for Western Area landfill site, solid waste management in Western Area and secondary cities and neighborhood upgrades.</p> <p>For the development of the landfill site in the Western Area, an ESIA and a standalone Solid Waste Management (SWM) plan shall be prepared that includes mitigation of E&amp;S impacts in accordance with ESS3.</p> <p>For market upgrades in secondary cities, waste management shall be address under the ESMPs in accordance with the ESMF and ESS3.</p> <p>For general wastes management, require and ensure that Project contractors develop and implement a waste management plan, including to manage hazardous materials and chemicals, as an annex to the Contractor ESMPs.</p>	<p><i>Solid Wastes Management Plan (SWM), Hazardous Waste Management Plan, Emergency Response Plan (ERP), and Traffic Management Plan shall be prepared once sites for specific interventions have been identified. The above plans shall be part of ESMP and applied throughout Project implementation. Same timeframe as for the preparation and implementation of the ESMPs.</i></p>	<p>MoF through the PMU. Funding covered by the Project</p>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY:</b></p> <p>Require and ensure that Project contractors develop and implement measures and actions to assess and manage traffic and road safety risks. These measures shall be included in the ESMPs to be developed under action 1.3 above.</p>	<p><i>Measures adopted on ESMP timeframe specified in 1.3 and implemented throughout Project implementation.</i></p>	<p>MoF through the PMU; Funding covered by the Project</p>

<p>4.2</p>	<p><b>COMMUNITY HEALTH AND SAFETY:</b>                  Require and ensure that contractors develop and implement adequate measures and actions to assess and manage risks and impacts to the community arising from Project activities in accordance with ESS4. These measures shall be reflected in a Community Health and Safety Plan to be included in the ESMP. These measures shall include, inter alia, measures to prevent, minimize, and mitigate: the potential for community exposure to communicable diseases, accidents and pollution; harm caused by Project workers; risks of labor influx; harm from responses to emergency situations; and sexual exploitation and abuse, and sexual harassment; and harm to or exclusion of Project benefits for individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, including but not limited to persons with disabilities.</p> <p>Contractors’ measures, and work methods shall be validated by the local authorities and approved by the PMU.</p> <p>The Community Health and Safety Plan (CHS plan) shall also include guidelines provided by WHO and GoSL’s directives on the prevention of community transmission of coronavirus disease (COVID-19). Each contractor shall be required to conduct its activities in such a manner as to ensure that its workers do not become the source or means of transmission of COVID-19 infection in communities.</p> <p>CHS shall be part of the ESMPs, which shall be prepared in accordance with the ESMF, in accordance with ESS4 and in a manner acceptable to the Association.</p>	<p><i>Measures to be adopted on same timeframe as ESMPs under 1.3 above, and thereafter implemented throughout Project implementation.</i></p>	<p>MoF/PMU/E&amp;S Specialists/ shall ensure that the document is approved and available prior to Project implementation activities as well as supervise implementation of the ESMP by the contractor.</p>
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<p>4.3</p>	<p><b>GBV AND SEA RISKS:</b></p> <p>a. Prepare, adopt, and implement a stand-alone SEA/SH Action Plan (GBV Action Plan) satisfactory to the Association and applicable to the Project as a whole, to assess and manage the risks of sexual exploitation and abuse (SEA) and Sexual Harassment (SH) consistent with ESS4.</p> <p>b. Hire a local nongovernmental organization (NGO) to assist in SEA/SH response, including supporting the preparation of the GBV Action Plan, the design of SEA/SH sensitive GRM, training and awareness raising on SEA/SH for the local communities and MoF, ensuring that care seeking behaviors and knowledge of how and where to report SEA/SH cases are known and support survivors to receive appropriate support services (medical/physical-social counseling and legal aid as agreed with the survivor).</p> <p>c. Project contractors shall be required to integrate GBV-related measures consistent with the GBV Action Plan as part of the contractor ESMP and shall strictly implement the GBV-related measures and accountability framework spelled out in this ESMP. The contractors shall ensure adequate costing and funding for the implementation of these GBV-related measures.</p>	<p><i>a. Submit the GBV Action Plan for the Association’s approval no later than 90 days after Project Effectiveness and in any event before the preparation of the procurement documents. Once approved, implement the GBV Action Plan, throughout Project implementation.</i></p> <p><i>b. NGO to be hired no later than 30 days after Project Effectiveness.</i></p> <p><i>c. Contractors to integrate GBV-related measures as part of Contractor ESMP on timeframe specified in in 1.5, and thereafter implement those measures throughout Project implementation. Recipient to monitor contractor compliance with GBV Action Plan and GBV-related measures in ESMP throughout Project implementation</i></p>	<p><i>MoF (Fiscal Decentralization Division) through the PMU/Project E&amp;S Specialists/ Contractors. Funding as part of Project cost.</i></p>
<p>4.4</p>	<p><b>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:</b></p> <p>GBV Action Plan shall be required by the contractor as part of C-ESMP with adequate funding for implementation.</p>	<p><i>Monitoring of contractor compliance with GBV Action Plan throughout Project implementation</i></p>	<p><i>MoF (Fiscal Decentralization Division) through the PMU/project E&amp;S Specialists/ Contractors. Funding as part of Project cost.</i></p>



<p>4.5</p>	<p><b>SECURITY PERSONNEL:</b>                  Subject to the provisions of ESS4 and the adoption of appropriate mitigation measures in the contractor ESMP, contractors may employ unarmed guards to help secure Project sites. These mitigation measures shall include security awareness training, fencing, sign-posing, lighting, ESHS, adherence to a GBV code of conduct, reasonable background enquiries, and referral to the Project GRM of any incidents or grievances related to security personnel. Any further security measures for the Project may only be adopted with prior written approval of the Association.</p> <p>Ensure that contractors do not engage in activities that may impede the operations of the Emergency Operations Center (EOC) or the security forces that are implementing the GoSL’s COVID-19 emergency preparedness and response under the current State of Public Health Emergency. Require and ensure that contractors observe all national laws, directives, regulations, lockdowns or curfews instituted by GoSL.</p>	<p><i>Security-related mitigation measures to be integrated in ESMP prior to hire of security personnel, and thereafter implemented throughout Project implementation.</i></p>	<p><i>MoF (Fiscal Decentralization Division) through the PMU/project E&amp;S Specialists/ Contractors.</i></p>
<p>4.6</p>	<p><b>TRAINING FOR THE COMMUNITY</b>                  Conduct training programs for Project-affected communities to raise awareness of Project-related environmental and social risks, impacts and mitigation measures, including but not limited to training on the following issues:</p> <ul style="list-style-type: none"> <li>• Community grievance redress mechanism as described in the SEP/ ESMF</li> <li>• Communicable and other diseases including HIV-AIDS/STI</li> <li>• SEA/SH awareness and prevention</li> <li>• Road Safety Awareness</li> </ul>	<p><i>Prior to initiating construction, with regular refresher training.</i></p>	<p><i>MoF (Fiscal Decentralization Division) /PMU E&amp;S specialists Funding as part of Project cost.</i></p>

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

5.1	<p><b>RESETTLEMENT PLANS:</b></p> <p>a. Prepared, adopt, and implement a Resettlement Policy Framework (RPF) for the Project consistent with ESS5 and satisfactory to the Association.</p> <p>b. Prepare, adopt, and implement resettlement plans (RAPs) and Livelihood Restoration Plans (LRPs) in accordance with ESS 5 and consistent with the requirements of the RPF. The respective RAPs and LRPs shall be implemented before carrying out the corresponding activities, in a manner acceptable to the Association.</p>	<p><i>a. RPF has been prepared and disclosed prior to appraisal, and to be implemented throughout Project implementation.</i></p> <p><i>b. RAPs and Livelihood Restoration Plans (LRPs) prepared for the neighborhood upgrade, landfill site and market upgrade and approved by the Association before commencement of procurement activities that involve land acquisition and resettlement.</i></p>	<p>MoF/PMU E&amp;S Specialists shall ensure that the RAP has been implemented consistent with ESS 5 before mobilization of contractor.</p>
5.2	<p><b>GRIEVANCE MECHANISM</b></p> <p>The grievance mechanism (GM) to address resettlement-related complaints shall be described in the RPF, RAPs and SEP, and will be completed before commencement of project activities. The GRM will integrate existing GRM systems in place at the MoF and the local level.</p>	<p><i>GM to be operationalized prior to commencement of resettlement activities and maintained throughout implementation.</i></p>	<p>MoF (Fiscal Decentralization Division) shall ensure a GRM has been set up and is operationalized before mobilization of contractor.</p>
5.3	<p><b>MONITORING AND REPORTING ON RESETTLEMENT ACTION PLANS</b></p> <p>Prepare and submit to the Association regular monitoring reports on the implementation of Resettlement Action Plans, including on issues related to land acquisition, assessment/census of Project-affected people and compensation.</p>	<p><i>Quarterly throughout implementation of RAPs</i></p>	<p>MoFPMU E&amp;S Specialists shall ensure that the regular RAPs implementation reports are prepared in a manner consistent with the requirements of ESS 5.</p>
<p><b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b></p>			

6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>No Project activity shall be conducted in the forest reserve or its buffer. Project activities shall be conducted in accordance with ESS6 to assess and avoid expected impacts on biodiversity and habitats., Where avoidance is impossible, such impacts shall be minimized, mitigated, and offset in accordance with the mitigation hierarchy provided in ESS1, including through the following procedures:</p> <ol style="list-style-type: none"> <li>1. Screening and risk classification of each subproject shall be conducted in accordance with the ESMF</li> <li>2. The risk level shall be reviewed throughout the Project life;</li> <li>3. Where the anticipated biodiversity impacts are low or moderate, then biodiversity mitigation measures shall be described in the ESIA and ESMP;</li> <li>4. Where they are substantial or high, a separate Biodiversity Management Plan shall be prepared and implemented by the contractor, in accordance with ESS6 and in a manner satisfactory to the Association.</li> </ol>	<p><i>Measures to be adopted as part of ESIA's and ESMPs on timeframes specified in action 1.3, and thereafter implemented throughout Project implementation.</i></p> <p><i>Where a Biodiversity Management Plan is required, it shall be prepared and adopted prior to commencement of field work, and thereafter implemented throughout Project implementation.</i></p>	<p><i>MoF (Fiscal Decentralization Division)/PMU E&amp;S specialist.</i></p>
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	Not currently relevant to the Project		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CHANCE FINDS</b></p> <p>Adopt and implement a Chance Find procedure in the ESMF developed for the Project in accordance with ESS8. Integrate Chance Find procedure in subproject ESMPs.</p> <p>In the event of a find, the Monuments and Relics Commission (MRC) that is entrusted with the protection of cultural heritage in Sierra Leone shall be contacted within 72 hours of the find.</p>	<p><i>Chance Find procedure integrated in sub-project ESMPs in accordance with timeframe in action 1.3, and thereafter implemented throughout Project implementation.</i></p>	<p><i>MoF (Fiscal Decentralization Division)/PMU E&amp;S specialists</i></p>
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	Not currently relevant to the Project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			

10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b>                  Update, adopt, and implement Stakeholder Engagement Plan (SEP) consistent with ESS10 in a manner satisfactory to the Association. A draft SEP has been prepared and disclosed before appraisal and thereafter shall be updated during implementation.</p>	<p><i>A draft SEP has be prepared and disclosed prior to appraisal. It shall be updated during implemented as needed when major changes are required and re-disclosed.</i></p>	<p><i>MoF (Fiscal Decentralization Division)/PMU E&amp;S specialists</i></p>
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b>                  Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP, consistent with ESS10.</p>	<p><i>The framework for project Grievance Mechanism in place prior to appraisal. It shall be updated and finalized, and the Grievance Mechanism operationalized as soon as possible before project effectiveness, and maintained throughout Project implementation.</i></p>	<p><i>MoF (Fiscal Decentralization Division)/PMU E&amp;S specialists</i></p>
<p><b>CAPACITY SUPPORT (TRAINING)</b></p>			

<p>CS1</p>	<p><b>Specify Training to be provided</b>                  PMU and Contractor staff shall be required to enhance their E&amp;S capacity in accordance with the project E&amp;S capacity building plan, including by undergoing training. Training requirements shall include:</p> <ul style="list-style-type: none"> <li>• stakeholder mapping and engagement</li> <li>• specific aspects of environmental and social assessment</li> <li>• Subproject Environmental and Social screening</li> <li>• emergency preparedness and response</li> <li>• community health and safety.</li> <li>• Occupational Health and Safety</li> <li>• Training on COVID 19 transmission, prevention, preparedness and response</li> <li>• Community health and safety</li> <li>• Monitoring and Reporting</li> <li>• SEA/SH Risk Mitigation</li> <li>• Disability inclusion training</li> <li>• GRM</li> <li>• Waste management (domestic solid wastes and sewage)</li> <li>• Documentation and reporting</li> <li>• Labor Management Procedures</li> </ul>	<p><b>Specify Targeted Groups and Timeframe for Delivery</b>                  District Engineers and Environmental Officers, Project Consultants.</p> <p>Training shall be conducted as soon as workers are mobilized for the project implementation and shall continue every quarter.</p>	<p><b>Specify Training Completed</b>                  This will be done before start of project implementation.</p> <p><i>MoF (Fiscal Decentralization Division), PMU E&amp;S specialists and contractors.</i></p>
<p>CS2</p>	<p><b>Train Project workers and community on occupational health and safety, including on emergency prevention and preparedness and response arrangements to emergency situations. Training subjects shall include:</b></p> <ul style="list-style-type: none"> <li>• community health and safety.</li> <li>• Occupational Health and Safety</li> <li>• communicable diseases/HIV-AIDS/STI awareness and prevention</li> <li>• community grievance redress mechanism as described in the Stakeholder Engagement Plan/ ESMF</li> <li>• process for resolving conflicts between workers and community members</li> <li>• SEA/ SH and Child protection.</li> </ul>	<p><i>Training shall be done before commencement of civil works</i></p>	<p>MoF (Fiscal Decentralization Division), PMU E&amp;S specialists and contractors</p>

