



Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 03/30/2021 | Report No: ESRSA01382



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Sierra Leone	AFRICA WEST	P168608	
Project Name	Resilient Urban Sierra Leone Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing	3/22/2021	6/8/2021
Borrower(s)	Implementing Agency(ies)		
Sierra Leone (Through its Ministry of Finance)	Freetown City Council, Fiscal Decentralization Division in Ministry of Finance, National Disaster Management Agency, Western Area Rural District Council, Bo City Council		

Proposed Development Objective

The Project development objective is to improve integrated urban management, service delivery, and disaster emergency management in Freetown and select cities of Sierra Leone.

Financing (in USD Million)	Amount
Total Project Cost	56.73

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

No

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

The Project is designed to support an integrated urban resilience intervention that takes a spatial approach to address in a comprehensive manner the multi-sectoral urban development challenges of the country, including urban governance, service delivery and disaster risk management. The Project is structured into four components.



Component 1: Institutional and Capacity Development in the Urban Sector; Component 2: Resilient Infrastructure and Services Delivery and Urban Greening; Component 3: Disaster Risk Management Capacity Development; Component 4: Project Management.

D. Environmental and Social Overview

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

The Project will support all seven city councils in Sierra Leone and the Western Area Rural District Council (WARDC). Specifically, the project will be located in the following regions: Western Area peninsula, (covering both the capital city, Freetown and the Western Rural District), the regional headquarter towns (Bo, Kenema, and Makeni), and the cities of Koidu, Bonthe and Port Loko. The city of Freetown is headed by the Mayor of Freetown, and the Western Area Rural District is headed by the Council's chairman. Freetown is located on the Western area peninsula and has a hilly landscape and low-lying coast surrounded by the Freetown River estuary to one side and the Western Area Peninsula National Park. The few remaining natural habitats are in the Western Area Peninsula National Park. Due to the dense population, the wetland areas are highly degraded and most rivers and streams, including the river estuary is highly polluted with liquid and solid waste from the city's overflowing waste dump sites and other wastes from settlements.

The Western Area is the most urbanized region in Sierra Leone, hosting nearly 1.5 million people in 2015 (about 21 percent of the country's population) with a density exceeding 3,000 people per km² in 2015. The City's growth has been rapid (3.01% per annum). Expansion has been unregulated, unplanned and on limited land space and scarcity of affordable housing leading to the rapid proliferation of informal slums. About 36 percent of housing in Freetown is considered informal, located mainly in the city center on reclaimed wetlands or next to dump sites. The slum communities continue to suffer from poor basic service delivery. About 95 percent of Freetown's population is not served by the water supply and only 22 percent of residents have access to improved private sanitation facilities. About 50 percent of cases recorded during the cholera outbreak in 2012 were in Freetown. The 2018 World Risk Report ranked Sierra Leone 24th out of 172 countries in terms of risk to natural disasters, the country has witnessed major floods and disease outbreak including the 2017 landslides and floods and the 2014 ebola outbreak that affected the population. While poverty decreased in rural areas from 79 percent in 2003 to 66 percent in 2011, the poverty rate in Freetown, increased from 14 to 21 percent during the same period, mainly driven by immigration.

A recent assessment of Bank portfolio for GBV risk indicates that the contextual risk of GBV prevalence in Sierra Leone is High. Based on the World Health Organization estimates, 1 in 3 women will have experienced rape within their lifetime in Sierra Leone. As documented in various studies the ebola crisis in Sierra Leone increased vulnerability of children to Sexual Exploitation and Abuse by Ebola workers and as such increased teenage pregnancies were recorded within the period. The project location is in densely populated low-income business areas which could facilitate high interaction between workers/laborers and street hawkers.

Social exclusion is another contextual challenge that is relevant to this project. Ten (10) percent of country's population is estimated to be persons with disabilities. Persons with disabilities face a widespread lack of accessibility to public infrastructure and basic urban services. They also face significant risk and vulnerability during disaster risk management (DRM). "Inaccessible shelters, lack of warnings in alternate formats, inability to evacuate,



communication barriers, loss of assistive aids (for example, wheelchairs and walking canes) can pose challenges in obtaining long-term recovery services” .

Labor management and prevention of child and forced labor is relevant under this project. As part of the legacy of the violence in the war and that of the HIV and AIDS epidemic and recently the Ebola epidemic, Sierra Leone has a sizable population of children who are orphans, who engage in child labor, and/or who do not attend school. Most of the waste pickers, particularly women, often work in hazardous conditions with their younger children and the risk of child labor will require critical attention.

D. 2. Borrower’s Institutional Capacity

The project will be managed by the Ministry of Finance’s (MoF) Fiscal Decentralization Division (FDD), which has established an internal Project Management Unit (PMU-FDD). Several public entities including ministries and local councils will be involved in the implementation of the environmental and social components/aspects of the Project. Their roles in relation to the project include permitting, construction, supervision, grievance redress, reporting, information disclosure etc. and this will require a lot of coordination. The project carried out a detailed E&S capacity assessment and identified gaps in staffing. The PMU although has some knowledge of the old safeguards policies, has no experience or capacity in applying the ESF and significant efforts will be required to build the capacity of the PMU in the application of the ESF. In addition, some of the instruments under the new framework such as a GBV action plan, Labor Management Procedure (LMP) and Environmental and Social Commitment Plan (ESCP) are new to the borrower. The human and logistical capacity within the PMU to ensure effective implementation and monitoring of the ESF is currently non-existent. Based on the capacity assessment recommendations, the PMU at the central level has recruited two safeguards specialists (Environmental and Social), a Communication and Community Liaison Officer and a Gender/GBV Specialist. Each local Council is staffed with an Environmental and Social Officer and will form part of the City Project Implementation Teams (CPITs) at the Regional or District level. They will have dual line of reporting to the CPITs and the E&S specialists at the PMU. The project level E&S capacity assessment recommends the establishment of an electronic or digital tools and supply of logistics including computers and accessories, vehicle and stipends for local council ESOs and Engineers to enhance capacity for E&S sub-project level monitoring and reporting. At the local level however, the Local Councils and the Ward Development Committees and key stakeholders including Community Based organizations, traders union etc will support project implementation. In particular for Resettlement planning and implementation, they will form a local level resettlement working group and will be involved in community mobilization and planning, Census enumeration, grievance resolution etc. The PMU may also hire external expertise, NGOs and consultancy services, where necessary to support local level implementation. Follow up Resettlement Action Plans (RAPs) will spell these arrangements in detail. Contractual provisions make it clear for contractors and supervising engineers to have qualified E&S staffing to execute works contracts. Third Party Monitoring by an independent consultant (firm) shall be appointed no later than one month after project effectiveness to conduct baseline assessment and thereafter annually monitor the implementation and compliance with the ESMPs (including contractor Labor Management Plan, GBV action Plan, RAPs, LRPs, SEP, OHS plan, emergency preparedness and response plan). GBV service providers will also be used to support SEA/SH response under the project. A detailed capacity building and institutional strengthening plan is documented in the assessment report to guide the project



E&S capacity enhancement efforts. The Sierra Leone Environmental Protection Agency (SL EPA), just like the PMU, does not have any experience in the application of the new ESF and will need capacity building support in the expanded scope and application of the ESF.

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

A. Environmental and Social Risk Classification (ESRC)

High

Environmental Risk Rating

High

The project environmental risk rating is proposed as High because of the scale and nature of the proposed activities as well as the borrower capacity to implement the project. The project activities include comprehensive solid waste management solutions across collection, transfer and disposal of waste for the Western Area (Freetown and Western Rural District) and support to SWM operations in Bo, Makeni and Kenema cities. The intervention in the Western Area would include the construction of a new sanitary landfill, and waste sorting and recycling facilities (waste transfer stations). The solid waste disposal interventions are particularly high risk from the environmental perspective due to the lack of appropriate alternative disposal sites and the intervention could increase the risk of pollution from leachate, gas emissions as well as the possibility of outbreak of waterborne diseases. The E&S risk of the intervention in the secondary cities is substantial as it could contribute to an improvement of poorly managed facilities and operations. However, improvement of the waste management systems and processes could lead to an increase in the disposal of wastes at the respective landfill sites, and subsequently to their saturation. There may also be the issue of environmental legacies associated with these landfill sites. Given the weak capacity of the client to handle such largescale movement of solid waste and supervision by the city councils and the EPA, the proposed environmental risk of the project is high. Civil works under the neighborhood and market upgrade subcomponents (2a and 2c), such as drainage upgrading, walkways, streetlights, roads, bridge, provision of water and sanitation facilities, will be conducted in densely populated and/or traffic-congested neighborhoods. The potential environmental impacts caused by these upgrading and rehabilitation construction works and associated handling and storage of construction material may include traffic accidents, waste production, excessive noise and dust levels, and disposal of asbestos containing material, if present. Some of these environmental impacts may not be temporary, reversible, low in magnitude and site-specific.

Social Risk Rating

High

The social risk rating for the project is proposed as High. The project will construct significant infrastructure associated with the neighborhood upgrading, construction of a new landfill site, rehabilitation of existing transfer stations in the Western area of Freetown, and market upgrading. Some of these interventions will be undertaken in densely populated urban areas in low income communities. The social risk considers the scale of impacts from these interventions as well as the PMU's current experience and capacity to mitigate the impact in accordance with the requirements of the new Environmental and Social Standards. In-situ slum upgrading is proposed to minimize resettlement to the extent feasible. However, considering the congested nature of the slums, some residual physical and economic displacement, both temporary and permanent are still anticipated. The cumulative resettlement impacts from the three (3) proposed neighborhood upgrade sites although not estimated at the moment could potentially be significant. With limited land availability in Freetown, resettlement options will require careful



considerations to ensure productive resources and incomes of potential PAPs are restored. There is also the risk of temporary livelihood disruptions of traders during the market upgrading work. Construction of a new Landfill will require land in sufficient size for the works and a buffer area from human settlement. The Landfill site could impact land use change and cause possible displacement. Waste pickers may lose access to their livelihoods where existing dumpsites and transfer stations are considered for rehabilitation. The project is proposing to use vacant government lands for the landfill construction. In many cases, unused or underused state land is undocumented and may be subject to occupation, sometimes by “illegal occupants” and contestation. The project has established criteria to verify ownership of land and to avoid any site with potential dispute. As the project footprint is envisaged to be large, increased movement of trucks and other machinery in densely populated neighborhoods may pose a risk of injuries and accidents to workers and community members.

The project has significant community health and safety risks. A large number of skilled and unskilled labor is also in search of employment opportunities is anticipated. The influx of workers and other followers into a project area can lead to adverse social impacts such as Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), risk of spread of communicable diseases and pressure on limited local amenities. Persons with disabilities face a widespread lack of accessibility to public infrastructure and basic urban services which hinders their participation in employment and social activities. Client commitment and lack of capacity to implement the ESF, particularly resettlement issues in Sierra Leone, has generally been challenging which contributes to the high risk. The project activities will also be executed within the context of COVID-19 and there is additional risk of potential COVID-19 infection among workers and communities during works. It is expected that the project will be conducted with special care to avoid the transmission of the disease, within the context of WHO guidelines and Government of Sierra Leone (GoSL) policy and directives on the prevention of transmission.

Public Disclosure

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

At this stage, potential project areas of influence are known. However, further prioritization and studies are required to narrow down or select the specific locations for investment activities such as a new landfill construction, market upgrades and rehabilitation of existing transfer stations, neighborhood rehabilitation (drains, access roads, water supply and sanitation facilities). Some of the project activities will take place in the Greater Freetown Area located mainly in the city center within dense, low income informal neighborhoods. Based on the project description of the possible activities, key environmental and social issues will likely relate to (i) waste management, (ii) health and safety of communities and workers during the construction and operational phase, (iii) erosion from earth works (iv) run-off from leachate, (v) spontaneous fires and gas release (including Green House Gases) from existing landfill sites and (vi) impacts on water quality and quantity (vii) traffic accidents (viii) labor influx amongst others. Residual resettlement risk may potentially occur following the in situ slum upgrading as well as livelihood displacement of waste pickers and change in land use from the construction of the landfill site and disruption of trading during market rehabilitation. The interventions in the secondary cities at the operational stage, will increase the efficiency of the



SWM systems, and significantly reduce the amount of wastes ending up in illegal and informal channels. However, the quantum of wastes dumped at the landfill site will increase markedly, leading to saturation of these sites. The neighborhood and market upgrades will take place in densely populated areas, there are significant risks of community and occupational health and safety issues, noise and dust generation, construction wastes disposal, sediment transport and pollution of adjacent surface water and wetland, with downstream impact of aquatic ecosystems and species diversity; the extent of which could depend on the scale of the intervention. Western Area Landfill site: The GoSL is conducting a wide search for a 100-acre piece of land for constructing a new landfill. Five sites were previously considered for this site, two of which were ruled out of this study as the land belonged to the military and therefore unavailable. The remaining three sites under consideration are on the slopes overlooking the stretch from Hastings to Rokel. Preliminary assessment of these three sites suggests that site selection will be a challenge due to (i) land ownership issues, (ii) the mountainous terrain of the western area, and hence the potential sites; (iii) the difficulty in finding a site of the required size (100 acres) that meets other criteria; (iv) the distance of sites from the waste catchment area, and; (v) proximity to sensitive ecosystems, including streams, settlements and the forest reserve (Western Area Forest Reserve). Additional criteria employed in the determination include slope stability and susceptibility to erosion and flood hazard, adequate buffer zone from population, settlements and airports, and locations outside of permeable geological barrier, such as sands and alluvial gravels. Some of the sites may be on private land which brings the issue of accessibility and acquisition to the fore. For this reason, site selection and identification is in the hands of an inter-ministerial working group set up by the borrower and constituted by the Ministry of Finance, Ministry of Lands and Housing, EPA, FCC and WARDC, which is using a multi-factor selection criteria that includes E&S parameters. However, the World Bank team will be fully involved in the selection of the sites. A drone survey of the proposed three sites is being completed and the inter-ministerial committee will make its recommendation for Cabinet approval in early April. Feasibility studies on the selected site including hydro-geological analysis, soil boring experiments, and other geo-scientific studies will be done to obtain additional information. The project is setting a disbursement condition to ensure that site is selected in full consideration of E&S impacts, land is secured and all required safeguards instruments in place prior to disbursement for the works package, and with a deadline for the end of year 1. SWM Support to Secondary cities: In all the potential secondary cities, waste collection is problematic, due to the absence of a proper waste management system, personnel, resources and equipment. The situation is more precarious in Bo with 5 official dumpsites and numerous illegal ones. The main dumpsite, which is also near saturation point, is located about 8 km from the city center. While the project will improve SWM in these cities, implementation could also elevate E&S risk such as fire and inhalation of toxic fumes from burning wastes by waste pickers, scavengers, squatters and the neighboring communities; leachate, methane odor and unsightliness of the site. In addition to these risks, the intervention might be inheriting legacy issues from ground and surface water pollution of community water source, respiratory diseases amongst waste pickers and the neighborhood, lingering litigation or unresolved grievances over matters ranging from land ownership to infection; soil and crop pollution from toxic and hazardous wastes, especially for sections of the community using landfill 'organic' wastes for agriculture both on-and offsite. Neighborhood and market upgrade: The communities are densely populated with poor access to social amenities including water, poor roads and are prone to flooding. Domestic water is sourced from open streams and wells, and the roads running through these communities are unpaved and in terrible condition. Some of the construction-related risks are Community health and safety, SEA/SH, elevated noise and dust levels, clogging of drains by sediments, rocks and construction wastes. The project will also need to manage water resource efficiently for the urban greening project. The project will transfer the responsibility for growing the trees to communities. Hence, water will be sourced from diverse locations across the city over time, thereby reducing the stress per location. Environmental and Social Assessment: The locations for the



neighborhood upgrading has been narrowed down to 3 potential communities however, the exact locations within the communities, designs and the selected interventions are yet to be determined following the completion of feasibility studies after project appraisal. Selected markets and transfer stations for rehabilitations are all yet to be confirmed during implementation. RPF and ESMF were prepared to cover the neighborhood upgrade and other intervention whose sites (market upgrade, rehabilitation of waste transfer stations, landfill site etc) may not be known by project appraisal. The depth of social analysis in the ESMF has detailed appreciable and adequate information (broadly) of the slum communities including the social vulnerabilities, social diversity and gender, GBV assessment, pattern of social interaction etc. ESIA's and or final ESMPs will be prepared when the selected communities and suite of activities are finalized during implementation. The RPF established the general principles and procedures for the preparation of follow up RAPs compatible with ESS 5. Once the sites are confirmed and engineering designs become available, the RPF will be developed into specific RAP. The location for the new landfill site in the Western Area is not known at this stage. It is proposed that the new landfill site will be located in one of the 3 potential locations. The ESMF covers the potential landfill sites, to examine the risks and impacts of construction and operation of the new landfill site as site details and selection have not been determined at the moment. Options for the Western Area landfill site are under investigation, and the final selection will not be known by Decision Meeting. The client has launched drone surveys of the proposed sites to get an overview of the topography and surrounding built area, natural assets, delineate the potential sites, and also conduct a preliminary E&S risk assessment in order to inform the site selection decision. Based on the findings of the E&S, and given the level of risk of some of the activities, the borrower will prepare a separate ESIA accompanied by an ESMP for the Western Area landfill site following site selection, and for the neighborhood upgrade intervention. A risk assessment following market selection and specific activities will inform the type of safeguards instrument applicable to the market upgrade. An ESIA will be prepared and implemented for a substantial risk, while an ESMP will be applicable to a moderate risk. The intervention in the secondary cities would require an ESMP and a solid waste management plan (SWMP). The preparation of the ESIA and RAP or The ESIA for the potential future upgrading of the existing landfill SWM in Bo will include a comprehensive baseline data collection, with extensive and in-depth coverage of E&S legacy issues A Livelihood Restoration Plan for waste pickers will be prepared once the site for the new landfill and engineering designs are confirmed. The TOR for carrying out the ESIA for the landfill site in the Western Area has been cleared internally, and the tender process, including that for the preliminary designs for for the landfill is in process, but these cannot be finalized until the final site is known. TORs are also being prepared for the ESIA study on the neighborhood upgrade in Freetown. The nature of the project activities also call for the borrower to prepare OHS Plan, ERP, LMP, and GBV Action Plan in accordance with ESS1 and the SL-EPA Act (2008). The LMP has been prepared as part of the ESMF. The rest of the documents will also be attached to the site-specific ESMPs.

ESS10 Stakeholder Engagement and Information Disclosure

The project scope and complexity will require significant coordination and input from different stakeholder groups including those who will directly be affected as well as those who have other interests in the project. Stakeholder consultations is essential to provide inputs as appropriate to the project design, environmental and social assessment and mitigation plans, Environmental and Social Commitment Plan (ESCP), monitoring reports, and further evaluation of the project. This Project will be implemented in low income, informal, dense communities in the capital city of Freetown. The communities are usually characterized by ethnic, demographic and social disparities (including gender disparities), low literacy level etc. Work in such environments without adequate consultation and information disclosure could spur misinformation, affect community support, potentially amplify the project's social risks levels



and exclude some groups from access to the project services. As part of the project preparation, the project initiated consultations with key stakeholders including the authorities of the Ministry of Lands, Housing and Environment, EPA, Office of the National Security, utility companies, Commercial and Development Banks, Development Partners, Local Councils, local community members etc. The project has conducted a stakeholder analysis with specific identification of vulnerable groups and consolidated into a Stakeholder Engagement Plan (SEP) to be implemented throughout the project life. Consultation and engagement with local communities will go beyond risks, and focus on the unique needs of women, children, persons with disabilities, and youth especially as it relates to access to community service. The SEP has outlined different access and communication needs of various groups and individuals particularly the vulnerable and disadvantaged groups (persons with disabilities, the elderly, women, etc.) to ensure effective engagement and disclosure of project information and access to project benefits. The project will design and incorporate a comprehensive project-wide GRM which will enable a broad range of stakeholders to channel concerns, questions, and complaints to the various implementation agencies. Particularly the GRM will have a trained GBV specialist to address any GBV related issues and complaints. The SEP is budgeted for and as part of its implementation, the client will maintain a community liaison officer who will liaise with local level actors in the communities.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

The project footprint is envisaged to be large and will likely occur in a sensitive environment given the nature and topography of Freetown and its environs. The project will require a large number of skilled workers and some unskilled workers especially for the design and construction of the sanitary landfill site, in-situ slum upgrading, market upgrading and project workers to maintain project oversight etc. While the total number of workers required cannot be estimated at this stage, It is envisaged that different type of workers including direct, contracted and primary supply workers will seek employment opportunities and borrower will need to ensure fair treatment, non-discrimination and equal opportunity in the recruitment process and project benefit. The search for jobs and procurement opportunities from the project could also provide grounds for sexual harassment, and transactional sex including sexual exploitation of young girls. This standard requires the borrower to institute measures to protect workers, including vulnerable workers such as women, persons with disabilities and children. Sierra Leone have a heightened risk of child labor. Both the Sierra Leone National Labor Law and ESS 2 prohibits the use of any form of child labor or forced labor. Whereas the national labor law set a minimum age for less strenuous/hazardous jobs at 13 years, ESS2 put the age at 14 years. The most stringent is ESS2, which is aligned with the Child Rights Act, 2007, the minimum age for engagement in hazardous work, such as construction works. This will thus apply at the construction phase of this project. The high infrastructure footprint associated with trucks and vehicular movement, handling and storage of construction material will require adequate protection of the health and safety of workers on site. It is envisaged that a contractor's camp will be set-up to house machinery and for maintenance and also as a site office for the contractors while accommodations for external workers may be rented by the worker within the city. The influx of workers and other followers into a project area can lead to adverse social impacts risk of spread of communicable diseases including exposure to COVID-19 infection and pressure on limited local amenities. The project ESMF includes a labor management procedure (LMP) that outlines the ways that the different categories of project labor force applicable to the project will be managed including managing issues related to child labor, labor



influx and working conditions. The contractor during implementation will be required to develop a Labor Management Plan as part of the C-ESMP and employment contracts, based on the LMP. As part of the mitigation measures of the LMP, the borrower will establish written employment contracts for all workers upon hiring, institute a worker’s grievance mechanism to address workplace complaints including measures for SEA/SH prevention and response. The borrower will ensure that both skilled and unskilled workers will be sourced locally to the extent possible to minimize the external labor.

Occupational Health and Safety (OHS): The OHS risks both at the construction and operational stages of this project include incidents, accidents and fatalities related to road safety issues and operation of equipment and machines, exposure to high levels of dust, noxious fumes, noise and vibration, transmission of infectious diseases, such as COVID-19, and STDs, but also water-related and vector borne diseases. The risks are potentially higher at the construction stage. For rehabilitation of old market structures, there is the risk of inhalation of asbestos particles from whole or partial demolition. The OHS plan to be prepared by the borrower will include at the minimum procedures on investigation and reporting of incidents and non-conformance, emergency preparedness and response procedures and continuous training and awareness creation for workers, use of right Personal Protective Equipment, the handling of asbestos containing materials, where applicable etc. OHS has been covered in the ESMF, but a detailed OHS plan will be included in the ESMP, which will be prepared at project implementation. The project implementation team will also be familiarized with the Environmental and Social Incidence Report Toolkit (ESIRT), which will be used as a guide for reporting incidents to the Bank.

COVID-19 Transmission risks: for all works, care must be taken to prevent transmission of COVID amongst construction workers and the community at large. All works must follow WHO guidelines on COVID-19 preparedness and prevention.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project activities under Component 2 will require construction materials such as cement, granite aggregates, steel rods, stones, sand, concrete blocks, timber and bush sticks. The quantum of construction materials required will vary with the type of project activity, with that for the construction of the landfill site being higher. Collectively, the neighborhood upgrade will also require a large quantity of these materials. For the landfill site, the contractor is expected to establish a borrow pit, a spoils disposal site and a campsite, the management of which will be covered in the ESMP for the landfill site. For the neighborhood upgrade, the borrow material will be obtained from already existing and licensed borrow pits within Sierra Leone and possibly close to the project areas to reduce the transportation distance. Should there be the need to open new borrow pits, the project shall ensure that all national regulations and assessments and permitting requirements are adhered to and pits reinstated as may be required through the ESMP. The adequacy and enforcement mechanisms of these laws and regulations would be evaluated as part of the E&S assessment process in a section that would outlined policies, legislatives and administrative framework to guide the implementation of the project.

High pollution risks are anticipated at the construction and operational stages of the landfill site. As such, E&S factors have been incorporated into the site screening and selection processes, in order to minimize risks. The factors include, proximity to water courses, valleys, wetlands and forest reserve, domestic water source, community and



utility facilities and access to roads. The ESIA and ESMP are anticipated to be done to sufficiently high standards to comprehensively address the risks. In terms of consultancy services for the ESIA studies, preference is given to established international firms with experience in carrying out ESIA of landfill and related projects. Environmental risks are anticipated to be lower with the neighborhood upgrade activities due to the brownfield nature of the work environment and the reasonable distance from sensitive ecosystems. Social risks, on the contrary will be much higher with the neighborhood upgrade as contractor workers will be in close contact with the project communities (see section on Community health and safety). General ESS3 risks are discussed in the following paragraphs.

Air emissions: Air emissions will include exhaust from heavy vehicles and machinery, and fugitive dust generated by clearing, grubbing, compaction and other site works during construction, but also during the operational stages of the landfill and sanitation facilities. . Those most likely to be affected are people living in close proximity to the proposed sanitary landfill sites and waste pickers and also the construction and upgrading sites, although downstream impacts can reach distant communities depending on the scale of the intervention and environmental factors, such as wind and rainfall effects. Mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impacts and residual impacts are expected to be limited in scope and duration. The establishment of a sanitary landfill will need to be carefully designed to include options to assess and minimize the release of Green House Gases into the atmosphere.

Noise: Noise will likely be generated from use of construction machinery and vehicle movement.

Waste management: Liquid and solid waste will mainly include excavated soil, oils from construction machinery, concrete blocks, metal and glass pieces etc. Waste will be segregated, stored and disposed at sites that will be approved by Ministry of Internal Affairs, Local Government and Rural Development with the technical support of the Ministry of Health and EPA. It is also expected that for the existing waste dump sites there might be the need to move substantial quantities of waste elsewhere to make room for the works. The ESIA's will determine the routes and the disposal options for such waste. The landfill feasibility study in the Western Area will consider the safe and effective capture of landfill gas including the needed financial resources and technical know-how to establish and operate a gas capture project. There is also the potential for further pollution of the Freetown river estuary located downstream of both waste dump sites and the project will take special care to remove over spilling solid waste material and to divert or collect toxic leachate which is currently draining freely to the river estuary. These design and engineering measures will be critical to minimizing risk of pollution. With regards the new sanitary land fill site to be constructed, care will be taken to select a location that will avoid potential pollution of habitats and impacts on flora and fauna. For asbestos containing materials, if encountered during market upgrade, handling and disposal options and approval will be discussed with EPA prior to commencement of works. In that case, an asbestos management plan will be included in the ESMP. The handling and disposal of household hazardous wastes, and the collection and transfer of sewage sludge from septic tanks and similar treatment facilities from the upgraded markets at the operational stage of the project will also be addressed under the Waste Management section of the ESMP. In Bo, the activities that are likely to generate wastes are (a) renovation of site ancillaries such as access road, perimeter fence and weighbridge at the existing landfill, and, (b) the upgrading of the current vehicle maintenance facility. Wastes could include debris from clearing and grubbing for access road expansion and grading, and erection of a perimeter fence. Depending on the nature of works, there might be additional construction/rehabilitation wastes from upgrading of the vehicle maintenance facility, and a broken scale and associated installations from the landfill weighbridge. Wastes could also include used oil, used filters and damaged or replaced parts from vehicles, machines



and equipment operated by the contractor hired to implement the works. The management of such wastes will be covered in the ESMP. Physical works shall be limited to the Dry Season to minimize runoff, sediment transport and water pollution. If initial assessments suggest that road works will involve removal of spoils, a section of the ESMP will address the disposal of such wastes. If laterite materials would need to be brought to the site from a borrow pit, such material will be obtained from an approved supplier; no borrow pit shall be constructed.

ESS4 Community Health and Safety

The project's physical works will take place within densely populated parts of the cities and close to the dwellings. Careful planning and design considerations would be necessary to maintaining the health and safety of residents, waste pickers, vendors, visitors and nearby communities throughout the works phase. Potential threats to people and communities may be posed by uncovered or poorly signed spots such as excavated sites, trenches, open electric cables, traffic routes, air pollution, etc. Careful consideration in the design, construction, operation and maintenance of the proposed landfill site would be necessary to avoid future run-off from leachate, spontaneous fires and gas release that could impact the health and safety of residents in close proximity to the site. The project will evaluate the potential livelihood implications of the new landfill on current informal waste pickers, explore options on minimizing any potential adverse impacts on their livelihoods including through the development of a livelihood Restoration plan. The project will also aim to support Professionalization of SWM activities to stimulate local businesses and jobs in relation with waste diversion to reduce waste leakage. Typically, with waste dump facilities, there tend to be end line workers like waste pickers and women that may work at SWM sites in hazardous situations with their children. The project ESIA will evaluate this risk further with considerations for protecting the health and safety of these groups. The project will also assess during the preparations, options to establish recycling and composting activities to engage waste pickers in an improved, better controlled system.

The influx of workers and other followers into a project area can lead to adverse social impacts such as SEA/SH. The high contextual GBV risk in Sierra Leone (more than half of women and men age 15-49 having experienced physical violence at some point since age 15) and weak legislation to address sexual harassment and domestic violence, points to the need to protect children, women and young people from potential sexual exploitation and abuse by contractor workers. Labor influx can also create risks of spread of communicable diseases like malaria, HIV, COVID-19 etc. to host communities and vice versa as well as exert pressure on limited local amenities. It is envisaged that a contractor's camp will be set-up to house machinery and for maintenance and a site office for the contractors, and may retain direct or contracted workers to provide security to safeguard the site and property. The deployment of government or armed security is not envisaged. However, the contractor will be required to undertake reasonable verification of security personnel to ensure they are not implicated in any abuses, they are trained and can ensure appropriate conduct towards workers and affected communities.

The borrower will ensure that the physical works are carried out in accordance with national and legal requirements, Environmental Health and Safety Guidelines (EHSG) and other Good International Industry Practice (GIIP) including the World Bank good practice note for addressing GBV in large civil works and national and WHO COVID -19 protocols as part of the ESIA. the potential risks and impacts on residents, vendors and the local communities will be assessed and addressed in the project ESMPs. The project will hire a local Nongovernmental Organization (NGO) no later than 30 days after project effectiveness to assist in SEA/SH response, including supporting the preparation of the GBV



Action Plan (finalised approval no later than 90 days after Project Effectiveness and in any event before the preparation of the procurement documents) , 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). 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. It is envisaged that a special traffic management plan may have to be prepared and implemented by the contractor to manage particularly traffic access to the sites. The borrower will also prepare an Emergency Response Plan (ERP) in co-ordination with the local council (FCC) and affected communities as part of the ESMP.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The Project may induce involuntary resettlement, in varying scale and magnitude. Neighborhood upgrading of informal settlements will include activities such as drainage upgrading, walkways, streetlights, roads, water and sanitation facilities. The project intends to focus on in-situ upgrading to minimize involuntary resettlement. However, considering the congested nature of the slum communities, these activities may still have residual resettlement risk and may induce physical displacement, both temporary and permanent. Three slum communities are currently considered and cumulative resettlement impacts could potentially be high. Land availability in Freetown is limited and affected PAPs may lose their locational advantage of being closer to their sources of livelihoods and incomes. Resettlement options will therefore require careful considerations to ensure productive resources and incomes of potential PAPs are restored. The SWM subcomponent (2b) will include both the construction of a new landfill and rehabilitation of existing transfer stations could lead to land acquisition, livelihood displacement and change in land use in the affected communities. The market upgrade interventions may also lead to temporary livelihood disruptions of traders. During preparation the project evaluated the implication of the establishment of the proposed new waste management landfill site on resettlement and livelihoods. Updates from all pre-selected sites suggest that the locations have minimal residential houses and physical resettlement will be minimal. The Lands of two sites are however privately owned and will include the need for land acquisition and impact on some crops. The ownership of these lands however will need to be clearly ascertained and documented. A livelihood Restoration Plan will be prepared to mitigate any adverse livelihoods impacts once determined during preparation. The exact investment footprints of the neighborhood upgrade intervention will be determined following the completion of a feasibility study and engineering designs. Location for the market upgrade, landfill site and transfer stations will be determined during implementation. An RPF has therefore been prepared to cover project interventions at this stage. The RPF establishes the general principles and procedures for the preparation of follow up RAPs compatible with ESS 5. Once the sites are confirmed and the necessary information becomes available, the RPF will be developed into specific RAPs. The borrower will also prepare a Livelihood Restoration Plan if it is determined the livelihood of waste pickers will be impacted by the construction of the landfill site. No physical and/or economic displacement will occur until the RAPs and LRP have been finalized and approved by the Bank.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources



All potential landfill sites are in close proximity to either the Western Area Protected Forest Reserve (WAPFoR) or streams, some of which empty downstream into the Sierra Leone River Estuary (a RAMSAR Site). While no project activity will be conducted in the forest reserve or its buffer, noise and vibration generated at the site during clearing and construction may affect wildlife. If exposed surfaces are not covered and slopes are not stabilized, sediments will be washed out into streams and eventually into downstream wetlands in the Rainy Season. Since specific sites will not be known during project preparation, an ESMF has been prepared that includes preliminary E&S assessments of all three potential sites covering the project risks to biodiversity, ecosystems and other critical habitats. The assessments indicated that the potential sites pose no E&S risks or threats to biodiversity or ecosystems and that there are no critical habitats on any of the sites. A full ESIA will be prepared once the site is selected and prior to disbursements for the landfill activity. The project activities in the proposed site will be conducted in accordance with ESS6 to assess and avoid expected impacts on biodiversity and habitats. No project activity will be conducted in the forest reserve, however, in a very unlikely event where avoidance is impossible and the risk level is substantial or high, a separate Biodiversity Management Plan (BMP) will be prepared to offset loss to biodiversity and ecosystem. This action can only be considered when all options have been exhausted in accordance with the hierarchy of mitigation that favors avoidance over minimization and ultimately, biodiversity offset. The decision to do so will be informed by the ESIA. The BMP will be guided by the sensitivity of the ecosystem or habitat, and the presence of species of conservation significance (IUCN-listed species). The project will be designed in accordance with the hierarchy of mitigation. To this end, E&S considerations have already been factored into the landfill site pre-screening and selection criteria that are being applied by the inter-ministerial site identification and selection working group. The working group will not finalize their selection by project appraisal.

Loss of vegetation and faunal habitat for the neighborhood upgrade will be minimal. Project physical activities will be within the brownfield environment, specifically the rehabilitation of the existing waste dump site. The areas are already modified; hence degradation because of physical works or additional infrastructure will be minimal. However, the preliminary E&S assessments, includes an evaluation of the potential for project activities to impact on any critical natural habitats (e.g. wetlands) near to the project site.

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

As of the current review there are no populations fitting the definition within the project area.

ESS8 Cultural Heritage

The proposed project will involve excavations, demolitions, movement of earth and solid waste material, hence this ESS is relevant. The degree of relevance of this ESS will be further assessed during project preparation as part of the ESIA process and appropriate steps taken to ensure conservation of cultural heritage during all phases of the project. The ESMF to be prepared for the project will also include a chance find procedure which will outline the steps to be taken if and when an item/s of cultural significance is discovered.

ESS9 Financial Intermediaries

The project is currently not proposing to use FIs for the implementation of any part of its activities.



C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

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

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

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

The borrower Framework is not being considered for use under this project

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Sierra Leone (Through its Ministry of Finance)

Implementing Agency(ies)

Implementing Agency: Freetown City Council

Implementing Agency: Fiscal Decentralization Division in Ministry of Finance

Implementing Agency: National Disaster Management Agency

Implementing Agency: Western Area Rural District Council

Implementing Agency: Bo City Council

Public Disclosure



V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Robert Curle Jesse Reid, Tiguist Fisseha
Practice Manager (ENR/Social)	Senait Nigiru Assefa Cleared on 26-Mar-2021 at 13:45:28 GMT-04:00
Safeguards Advisor ESSA	Nathalie S. Munzberg (SAESSA) Concurred on 30-Mar-2021 at 15:08:7 GMT-04:00