

**RESETTLEMENT ACTION PLAN REPORT
FOR THE
INTEGRATED AND RESILIENT URBAN MOBILITY PROJECT**

For:



**The Republic of Sierra Leone
MINISTRY OF FINANCE
PROJECTS FIDUCIARY
MANAGEMENT UNIT**

RESETTLEMENT ACTION PLAN REPORT

**OCTOBER
2018**

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LIST OF ACRONYMS

CBD	-	Central Business District
EA	-	Environmental Assessment
EHS	-	Environmental Health and Safety
EMP	-	Environmental Management Plan
EPA	-	Environment Protection Agency
ESHIA	-	Environmental Social and Health Impact Assessment
ESMF	-	Environmental and Social Management Framework
FCC	-	Freetown City Council
IRUMP	-	Integrated and Resilient Urban Mobility Project
GBV	-	Gender Based Violence
GIS	-	Geographic Information Systems
GRM	-	Grievance Redress Mechanism
MoF	-	Ministry of Finance
MoWPA	-	Ministry of Works and Public Assets
MoTA	-	Ministry of Transport and Aviation
MP	-	Member of Parliament
NGO	-	Non-Governmental Organisation
NW	-	North West
OHS	-	Occupational Health and Safety
OP/BP	-	Operational Policies/Bank Procedures
OPN	-	Operational Policy Note
RMF	-	Road Maintenance Fund
PAPs	-	Project Affected Persons
PFMU	-	Project Fiduciary Management Unit
PIU	-	Project Implementation Unit
RAP	-	Resettlement Action Plan
RPF	-	Resettlement Policy Framework
RWG	-	Resettlement Working Group
SE	-	South East
SLeTU	-	Sierra Leone Traders Union

SLMA	-	Sierra Leone Maritime Agency
SLP	-	Sierra Leone Police
SLPA	-	Sierra Leone Ports Authority
SLRA	-	Sierra Leone Roads Authority
SLRSA	-	Sierra Leone Road Safety Authority
SLRTC	-	Sierra Leone Road Transport Corporation
SOP	-	Standard Operating Procedure
TIDU	-	Transport Infrastructure Development Unit
TOR	-	Terms of Reference
WB	-	World Bank

GLOSSARY

- “Area of influence” means the area surrounding the project site within which environmental and social impacts could occur.
- “Census” means a field survey carried out to identify and determine the number of project affected persons, their assets, and potential impacts; in accordance with the procedures, satisfactory to the relevant government authorities, and the World Bank Safeguard Policies. The meaning of the word shall also embrace the criteria for eligibility for compensation, resettlement and other measures, emanating from consultations with affected communities and village leaders.
- “Compensation” means the payment in kind, cash or other assets given in exchange for the taking of land, or loss of other assets, including fixed assets thereon, in part or whole.
- “Compensatory measures” means measures to be taken when mitigation is not feasible, cost effective or sufficient and the term “compensatory measures” also applies to residual adverse effects which cannot be entirely avoided.
- “Cut-off date” is the date of completion of the census of project affected persons within the project area boundaries. This is the date on and beyond which any person whose land is occupied for project use, will not be eligible for compensation.
- “Displaced persons” means people living in the project area that must move to another location and the term “displaced persons” can be classified as persons: a) who have formal legal rights to the land they occupy; b) who do not have formal legal rights to land, but have a claim to land that is recognised or recognisable under the national laws; or c) who have no recognisable legal right or claim to the land they occupy, and also includes any person experiencing loss of asset, access to income whether of temporary or permanent nature due to the land acquisition process regardless of whether they are physically displaced or relocated or not.
- “Environmental Impact Assessment” consists of an environmental impact assessment study and an environmental impact assessment report that focuses on environmental issues and describes the impacts that the proposed project is predicted to have on bio-physical conditions if implemented, together with proposals for avoiding, mitigation or compensation for adverse effects.
- “Environment” means land, air, water and all plants, animals and human beings living therein and the inter-relationship which exists among these or any of them.
- “Environmental assessment” means the process of undertaking an Environmental Impact Assessment in accordance with the Act.
- “Environmental and Social Management Framework” is a safeguard instrument (document) which establishes a mechanism to determine and assess future potential environmental and social impacts of the project funded activities and other activities associated with the project. The framework sets out mitigation, monitoring and institutional measures to be taken during design, implementation and operation of the project activities to eliminate adverse

environmental and social impacts, offset them, or reduce them to acceptable levels. This instrument has been prepared as a separate and stand-alone document to be used in conjunction with the Resettlement Policy Framework.

- “Environmental licence” means an environmental impact assessment licence issued under the Act;
- “Environmental and Social Impact Assessment” consists of a report containing a simplified or limited Environmental Impact Assessment which incorporates sections on social impacts and health impacts and is appropriate for projects that require more limited environmental and social analysis than an Environmental Impact Assessment as their negative effects on the environment and the community can be eliminated or minimised by simple and easy to implement measures.
- “Government” means the Government of Sierra Leone.
- “Grievance Mechanism” means a mechanism to receive and address specific concerns about compensation and relocation that are raised by displaced persons or members of local communities and host communities.
- “Involuntary Displacement” means the involuntary taking of land resulting in direct or indirect economic and social impacts caused by: a) loss of benefits from use of such land; b) relocation or loss of shelter; c) loss of assets or access to assets; or d) loss of income sources or means of livelihood, whether or not the project affected person has moved to another location.
- “Involuntary Land Acquisition” is the taking of land by government or other government agencies for compensation, for the purposes of a public project against the will of the landowner. The landowner may be left with the right to negotiate the amount of compensation proposed. This includes land or assets for which the owner enjoys uncontested customary rights.
- “Land” refers to agricultural and/or non-agricultural land and any structures thereon whether temporary or permanent and which may be required for the Project.
- “Land acquisition” means the taking of or alienation of land, buildings or other assets thereon for purposes of the Project.
- “Local community” means any community of the local population within the project’s general area of influence who are likely to be adversely affected by the project and shall also include local populations who are either directly or indirectly affected by the project.
- “Monitoring” means the establishment of continuous or periodical procedures to monitor, measure, sample, record and analyse all environmental and social aspects of all project activities and shall include dynamic mechanisms, such as inspections and audits, where relevant, to verify compliance and progress toward the desired outcomes and such monitoring should be adjusted according to performance experience and feedback.

- “Project area” means the area covered by the Project;
- “Project affected persons” means persons who, for reasons of the involuntary taking or voluntary contribution of their land and other assets under the project, result in direct economic and or social adverse impacts, regardless of whether or not the project affected persons are physically relocated. These people may have their: a) standard of living adversely affected, whether or not the project affected persons must move to another location; b) right, title, interest in any house, land (including premises, agricultural and grazing land) or any other fixed or movable asset acquired or possessed, temporarily or permanently, adversely affected; c) access to productive assets adversely affected, temporarily or permanently; or d) business, occupation, work or place of residence or habitat adversely affected.
- “Resettlement Action Plan” means the comprehensive plan as further defined in any law relating to the resettlement of local communities;
- “Rehabilitation assistance” means the provision of development assistance in addition to compensation such as land preparation, credit facilities, training, or job opportunities, needed to enable project affected persons to improve their living standards, income earning capacity and production levels; or at least maintain them at pre-project levels.
- “Replacement cost” means replacement of assets with an amount sufficient to cover full replacement cost of lost assets and related transaction costs.
- “Resettlement Action Plan” is a resettlement instrument (document) to be prepared when subproject locations are identified. In such cases, land acquisition leads to physical displacement of persons, and/or loss of shelter, and/or loss of livelihoods and/or loss, denial or restriction of access to economic resources. Resettlement Action Plans are prepared by the party impacting on the people and their livelihoods. Resettlement Action Plans contain specific and legally binding requirements to be abided by to resettle and compensate the affected party before implementation of the project activities causing adverse impacts.
- “Resettlement Policy Framework” or “RPF” means the broad principles by which the applicant sets forth its proposals for managing all stages of resettlement as further described in any law relating to the resettlement of local communities.
- “Screening” means the process carried out by the Executive Chairman in consultation with the Board by which a decision is taken on whether or not an EIA is required, and what type of EIA is appropriate for a particular project;
- “Scoping” means the process of identifying the content and extent of the environmental information to be included within an Environmental and Social Impact Statement.
- “Scoping Report” contains the findings and recommendations of a scoping study.
- “Stakeholder” means any persons or groups that are directly or indirectly affected by a project as well as those that may have interests in a project and/or the ability to influence its outcome either positively or negatively and the term “stakeholders” include locally affected communities and individuals and their formal and informal representatives, government,

politicians, religious leaders, civic organisations, and other groups with special interests, the academic community, employees, their families and employee representatives, other businesses, financiers, shareholders and joint venture partners.

- “Vulnerable Groups” refers to: a) widows, the disabled, marginalised groups, low income households and informal sector operators; b) incapacitated households; and c) child-headed households and street children. This group is among other things, characterised by low nutrition levels, low or no education, lack of employment or revenues, old age, ethnic minority and/or gender bias.

EXECUTIVE SUMMARY

1. Compensation summary sheet

Nos.	Variables	Data
1	Country	Sierra Leone
2	Region/Province	Western region
3	Commune	Freetown
4	Arrondissement/Village	Lumley
5	Activities that requires temporary or permanent lands	- establishment of transit car park;- construction of transit market -options to reduce conflict between traffic and pedestrian -improvements in road circles and junctions
6	Project Total Cost	52 million USD
7	Total Resettlement Cost	1,854,927 USD
8	Number of Affected People (PAP)	914
9	Number of Affected Households (AH)	3, 656
10	Number of Tenant Households	12
11	Number of Resident homeowners, commercial and mix purpose	74
12	Number of Caretakers	5
13	Number of Affected Female	496
14	Number of Affected Vulnerable	51
15	Number of major PAP	222
16	Number of less Affected PAP	25
17	Total Number of legal owners	
18	Total Number of Only-assisted People	558 ¹
19	Number of Households losing their houses	74
20	Total Areas of expropriated land in hectare (ha)	17.13
21	Number of Households losing their crops	none
22	Total Areas of lost farmlands in hectare (ha)	none
23	Total Areas of lost and not replaceable farmlands (ha) – to compensate in cash	none

¹ loss of income

24	Number of houses demolished(residential, and mixed purposes; permanent and temporary/makeshift structures)	259
25	Number of houses demolished at 50%	
26	Number of houses demolished 25%	17 (only fences)
27	Number of fruit-crop trees lost	None
28	Number of commercial shops demolished	229
29	Number of street-sellers displaced	588
30	Number and types of community infrastructures disrupted/demolished	1 mosque
31	Number of telephone poles to move	5 fibre optic poles
32	Number of utility (energy) poles to move	54 (49 metals and 5 wooden)
33	Number/total length of drinking-water pipe to move	350m (estimated)

2. Brief description of project components

The City of Freetown is severely impaired by poor infrastructure, poor management of road space, an inadequate public transport system and a weak institutional and regulatory framework. Concerned at the worsening urban transport situation in the City, the Government of Sierra Leone requested the World Bank to support the preparation and implementation of an urban transport project to address short term issues and also develop a long-term strategic plan. Towards the achievement of the short- term objective, the Ministry of Transport and Aviation has developed a project comprising several interventions to address these problems. The project entails the following interventions:

- i. Establishment of a transit car park at Lumley Community (Kinston Upon Hull Way);
- ii. Construction of a transit market at Lumley Community to relocate street traders;
- iii. Options to reduce conflict between vehicles and pedestrians at:
 - Juba Road
 - Regent Road Lumley
 - Lumley Beach Roundabout (Kingston Upon Hull Way)
- iv. Improvements in
 - Congo Cross circle
 - Kissy Ferry Junction; and
- v. Improvements in Tagrin, Kissy and Government Wharf ferry terminals

The first two interventions listed will involve physical relocation. . The establishment of a transit car park and transit market at Lumley community will be mainly for the relocation of traders in the Lumley market and street traders along the Lumley-Juba road. Other households and businesses in the proposed site for the new Lumley market and Lumley car park along the road to Lumley beach will need to be relocated.

Other options to reduce conflict between vehicles and pedestrians at Juba road, Regent road Lumley and Lumley beach roundabout envisaged involve engineering related improvements and enforcement measures. The fourth intervention which entails improvements in Congo cross circle and Kissy Ferry junction is unlikely to involve any physical relocation but may lead to some economic displacement considerations. The improvements envisaged in Tagrin, Kissy and Government wharf ferry terminals are of a minor nature and may not result in physical relocation.

This project will not only improve mobility of vehicles and pedestrians in the areas specified above but will also enhance road safety as well as contribute to the enhancement of institutional capacity to plan and manage urban transportation in the municipality of Freetown.

The Request for Proposal (RFP) calls for the preparation of a Resettlement Action Plan (RAP) in line with the principles, procedures and processes outlined in the RPF using the most recent and accurate information on the: (i) proposed resettlement and its impacts on displaced persons and other adversely affected groups; and (ii) legal issues affecting resettlement. The RAP will cover elements that are specific to the selected locations in the project context.

The following sections of the RAP correspond to the scope of work to be completed by the Consultant. The studies include to:

- undertake stakeholder consultation of all project affected persons and communities, making sure that both women and men are consulted, as well as people with disabilities;
- outline means or ways by which grievances can be addressed;
- conduct a census of all project affected persons and communities;
- develop eligibility criteria for resettlement/compensation in close collaboration with the Project Affected People;
- undertake an inventory of properties affected and assessment of the affected assets and establish compensation entitlement matrix based on the findings of the census;
- develop a Grievance Redress Mechanism which incorporates existing local practices and the proposed structure outlined in the RPF;
- develop a form for recording complaints and attach this as annex to the RAP;
- prepare a comprehensive RAP report taking into account the national laws and the standards and requirements of the World Bank safeguards policies (OP4.12);and
- develop and enter a GIS linked database of affected assets, affected PAPs, asset valuations, records of complaints and other data.

This RAP is prepared according to World Bank 's Operational Policy 4.12 and Sierra Leonean law.

3. Objectives of the Resettlement Action Plan

The main objective of RAP is to set out principles, institutional arrangements, schedules and funding mechanisms for any land acquisition and resettlement that may occur as a result of the Project. The RAP also provides guidelines to stakeholders participating in mitigation of adverse social impacts of the project, including rehabilitation and resettlement to ensure that the social and economic well-being of project affected persons will not be worsened as a result of the project. In addition, the RAP provides a road map for resolving resettlement and compensation issues and presents an inventory of PAPs and their assets as well as the proposed compensation and resettlement packages.

These objectives were met using systematic, integrated, participatory and collaborative approaches. Information was collected through field investigations, structured questionnaires, census, assets inventory, document reviews and photography. Several PAPs were consulted. A cut-off date for the enumeration of PAPs was set.

The RAP was developed as per the guidance of OP 4.12 as reflected in contract's Terms of Reference, which form the scope of this report. The level of detail includes results of a socio-economic study that formed the social baseline, a description of compensation and income restoration options, a description of procedures for redress, institutional responsibilities for implementation, an entitlement matrix and budget with source of funds.

4. Main socio-economic characteristics of the PAPs living areas

The analysis of RAP data comprises three separate locations: Car Wash park, existing Lumley market and proposed route options to the proposed terminal and market. Two sets of censuses were done considering (1) households residing within RAP project boundary/proposed project locations and (2) businesses at existing Lumley market, Car wash park and proposed routes – business census and household census of PAPs that require resettlement actions.

Lumley area

Ninety one (91) households were enumerated in the entire census and 91 questionnaires administered to them at the same time. Of the 91 households enumerated, 21 (23.1% of total enumeration) were households along proposed routes, 69 (75.8% of total enumeration) at the car wash park and 1 (1.1% of total enumeration) at the existing market.

Out of the 21 households along the proposed routes, 61.9% are male headed whilst the rest are female headed. 78.3% of households at the car wash park are male headed and the only household at the existing market is male headed.

Analysis of all persons (household members) reveals that, at the car wash park, there are more males than females. This shift in proportion is also evidenced with households along the proposed routes. For households along the proposed routes, 52.4% of household heads are married to at least one spouse, 4.8% are widowed and 42.9% have never been married. From the car wash park, data reveals that 65.2% of household heads are married to at least one spouse, 21.7% have never been married and 10.1% are living in a consensual union.

As indicated in Figure 7.3-2, 33.3% of persons enumerated along the proposed routes have attained some formal secondary education but not completed, 21.9% have attained or are at post secondary level education whilst 3.8% have never been to school. At the car wash, the survey showed that majority of (49.2%) of household members have only attained or are doing some form of secondary education but have not completed, 25.1% have never been to school and only 1.1% have attained or are at post secondary education. 33.4% of household members residing at the existing market have never been to school, 33.3% have only attained or are doing some form of primary education and 33.3% have either attained some form of secondary education or are doing some form of secondary. Results show that a greater proportion (70.1%) of persons are illiterate with a higher of these at the car wash park. Figure 4.1 below shows the education attainment of household members.

Women and Vulnerability Context

Female headed households and women with low income levels and other vulnerable groups are considered special groups with special interest. This is because they might not have much resilience to cope with economic and social shocks as compared to other groups that are not considered vulnerable. As indicated in the following table, 2 children living with disability were reported to reside in the car wash park whilst 1 is reported to be residing along one of the proposed routes, 6 adults living with disability were reported to be at the Car wash Park, 6 households along proposed routes were reported to be headed by under-aged persons (<18years) persons. 4 child headed households were reported to be residing at the Car wash park. Of the 33.3% of the females residing along the proposed routes, 4.8% are widowed whilst 19.0% have never been married before. 23.2% of the 35.3% of females at the car wash have never married before. This depicts some high vulnerability index in both study areas. Household's livelihood outcomes are most often dependent on income level of the household, whilst household expenditure is also a function of household income. Some of household's outcomes may include better wellbeing and improved standard of living of household. This explains that the higher the income levels of household/person, the greater the propensity of that household to live an improved standard of living and to better the wellbeing of its members. The income level is greatly influenced by the type of economic activity/activities the household engages in - whether more profitable or less profitable.

Of all household members assessed, 100% of households at the existing market are engaged in small scale business/shop, 36.2% of those households residing along the proposed routes reported they are engaged in economic activities such as masonry; carpentry and agent, 5.7% are wage/salary earners and 6.7% are engaged in car washing at the Car wash park. 20.3% of households at the Car wash park are engage in trading activities (of varying items), 8.6% in car washing and 19.3% reported doing no economic activity at the movement.

Analysis shows low economic profile with numerous informal and less profitable economic activities for all areas assessed. This would mean that livelihood restoration programmes for all PAPs living at project sites must be given keen consideration.

The low economic profile of the assessment areas is evident from the income level of households in this survey.

The average monthly income from formal employment for households along the proposed routes is Le 2,691,250; average monthly income from casual labour is Le 1,171,428; average monthly income from business enterprises is Le 1,856,666.7. The households at the Car Wash Park have an average monthly income from business work of less than one million Sierra Leonean Leones- Le 1,009, 329 for the Car Wash Park as average monthly from formal employment, Le 935,518.5 as monthly average from casual work and Le 763,421 as average monthly earning from businesses.

Out of 477 women at the Lumley existing market, a significant proportion of 20.8% have never been married whilst 2.7% have divorced their spouse and 10.5% are living widowed. Of the 40 female owned business at the Car wash area and proposed access routes, 12.5% have never been married whilst 5.0% have divorced their spouse.

9.9% of traders/business owners at the Lumley market bring their children (<18years) to their business places during school hours and 8.3% at the car wash park also bring their children to their business places during school hours.

Of the 192 business owners at the existing market who reported they have assistants to their business, 3.1% of these assistants are disabled whilst 22.4% are children. 3.3% of the assistants at Car wash area are disabled whilst 15.0% are below 18years.

These analyses indicate a picture of a high vulnerability index for a significant proportion of women and children at the existing market and a medium index for the same category of people at the Car wash area. This situation therefore requires special consideration during resettlement and subsequent monitoring of the RAP programmes.

Socio-economic situation at the Congo Cross and Ferry Junction intersections

Cumulatively, 107 structures and structure owners were enumerated from the Congo Cross and Ferry Junction intersections, of which 31 were from Congo Cross and the rest from Ferry Junction. Of the 107 structures enumerated, only 88.8% (95) of structure owners were interviewed of which 66.4% of PAPS interviewed were from the Ferry Junction intersection. Out of the 95 PAPS interviewed, women/females represent the highest proportion amounting to 57.9%.

About a quarter of all those interviewed have never been to school and about half have only attained primary school education. Over 80 percent of the PAPS are married- either monogamous or polygamous and only 11.6% have never been married before.

No child or physical challenged person was found trading in those areas of the assessment.

At the Congo cross axis women are mainly in the food business, and other petty food items like sweets, biscuits, packet water and cigarettes. The team did not observe the presence of children at this place. According to some of these women, their children go to school in the morning and join them later in the day.

In the case of experiencing any gender-based violence at the Congo Cross point, they unanimously agreed that they have not experienced any incidences of gender-based violence which they believe is due to the presence of the Police Station at the Congo cross junction (roundabout). This serves as a deterrent.

The women however expressed fear at having been removed from that point without being sure of where they will be moved to. The team did not observe or interview any disabled or commercial sex workers at the Congo cross axis.

It is recommended that since there are just few women selling food at this axis, (a situation which grew up because of the presence of the drivers, bike riders and the Police), a makeshift be provided on the land that the drivers and bike riders will be moved to.

At the Ferry junction, women are engaged in petty trading, selling various kinds of goods (fruits, cooked food, used clothing, packet water, drinks, sweets, foot wears for both men and women, aluminium pots, second-hand tires etc.). Majority of the women sell in makeshift structures and the team did not observe the presence of children and the disabled. The women offered that their children go to school and cannot afford to take their children with them since majority of them come from distant places to sell their wares. Since the team did not observe any commercial sex workers, we enquired from them if they have any knowledge of their presence at the Ferry junction. The interviewees ascertained that they have not noticed commercial sex workers at the Ferry junction. They associated this to the Police presence which served as a restrictive measure. The women said that they will appreciate it if space is provided for them at the Peace Market, which for now is the only possible space they can get, to protect them from adverse weather conditions.

5. Social and economic impacts of the project on the affected people

A census and asset inventory of all PAPs affected by the project was conducted with the aim of establishing the exact number of those affected, types of impacts as well as size and quantity of affected assets. The project will affect 914 PAPs in total, 249 PAPs in the car wash site and access route, 558 in the Lumley Market Area and 107 in Congo Cross and Ferry Junction Roundabout area.. For an overview of the category and scope of the impact, refer to Section 8 of this report. **Error! Reference source not found.** provides a summary of impact categories for each Area.

Table 1: Summary of impact categories

Impact Category	No. of PAPs
CAR WASH SITE AND ACCESS ROUTES	
Complete loss of permanent residential/commercial structures at Car Wash Site	31
Complete loss of temporal residential/commercial structure at Car Wash Site	106
Needs for relocation of movable structures at Car Wash Site	27
Complete loss of commercial/residential permanent structure and land along routes	26
Complete loss of commercial/residential temporal structure and land along routes	25
Needs for relocation of movable structures along routes	9
Loss of fences and land	25

SUB-TOTAL	249
CONGO CROSS AND FERRY JUNCTION ROUNDABOUTS	
Needs for relocation of movable structures around Congo Cross Roundabout	31
Needs for relocation of movable structures around Ferry Junction Intersection	76
SUB-TOTAL	107
EXISTING LUMLEY MARKET	
Loss of income because of table space	533
Loss of income because of store/shop space	25
SUB-TOTAL	558
TOTAL	914

6. Entitlement Framework

This framework took into consideration the following very important requirements, namely, development moratorium, eligibility and the preparation of an asset inventory and valuation report.

Census and cut-off date

The project cut-off date was publicly disclosed and widely disseminated within communities whilst the individual cut-off dates were communicated to PAPs during consultations with them starting on 4th September. Following these activities, the project cut-off date was established as 18th September by the CEMMATS RAP team in conjunction with the MoTA, making anyone who makes a claim for loss of land or any assets after such a date ineligible for expropriation/ compensation.

The framework further considered that all persons making claim for loss of land and assets, in terms of OP 4.12, would be classified as persons (i) who have formal legal rights to the land or assets they occupy or use; (ii) who do not have formal legal rights to land or assets, but have a claim to land that is recognized or recognizable under national law; or (iii) who have no recognizable legal right or claim to the land or assets they occupy or use.

Finally, in accordance with the Resettlement Policy Framework (RPF), the following will apply:

- Compensation should be provided for the loss in production and loss of employee wages, as well as for transitional support in the form of a disruption allowance. The loss in production/income will determine based on audited results of the enterprises monthly income (where possible) combined with the expected duration for relocation (down-time). Lost wages will be determined through enterprise audit.

- Losses suffered by tenants or leaseholders, the valuation process will follow the same principles as for assets, while also fully accounting for the potential loss of income. Provisions should be made to estimate lost income without necessarily referring to audited accounts, given that most of the affected are likely to be involved in informal trade.

7. Livelihood Restoration

The objective of livelihood restoration activities is to ensure that no PAP shall be worse off than he or she was before the project. Restoration to pre-project levels of income is an important part of rehabilitating individuals, households and socio-economic and cultural systems in affected communities. The project will affect several PAPs during implementation who will need to be resettled and / or compensated for loss of income and disruption before construction activities commences. All livelihood restoration strategies that have been considered were based on the socio-economic characteristics of PAPs. The main objective of income and livelihood restoration strategy is to enhance the restoration of living standard and pre-displacement level at minimum and includes strategies which would improve future income and living standard. **Error! Reference source not found.** below illustrates what livelihood restoration plan will entail for identified PAPs and comprises type of proposed assistance, eligibility and recommended measures.

Components for livelihood and income restoration planning

Type of assistance	Eligibility	Recommended measures
Cash assistance to support income loss	All affected people directly impacted will be eligible for assistance for loss of employment/work days as a result of project implementation	<ul style="list-style-type: none"> • Affected stall / business holders will be paid a disturbance allowance as compensation money. The disturbance allowance had been calculated as a percentage of asset loss.
Assistance to re-establish business/enterprise	All owners of business will receive cash compensation plus shifting and moving assistance.	<ul style="list-style-type: none"> • Relocation assistance (relocation distance to be agreed upon with CLIENT – case-by-case consideration)
Special assistance for vulnerable groups	All affected who have been recognized as vulnerable	<ul style="list-style-type: none"> • One-time special assistance for each vulnerable household affected by the project
Employment of local people during project construction, access	All qualified affected people and their dependents (Including women). A list of all affected people who will be	<ul style="list-style-type: none"> • Local people who have been impacted by the project will get greater preference in jobs related to the project construction.

Type of assistance	Eligibility	Recommended measures
roads, camp and quarry sites	suitable for employment as construction workers should be prepared.	<ul style="list-style-type: none"> • Vocational training on various portable skills.
Financial Management Training	All identified affected stall holders	<ul style="list-style-type: none"> • Provide financial management training to all identifies PAPs (Capacity building initiative)

8. Vulnerable PAPs

According to the census survey, the following vulnerability categories were confirmed:

- female headed households / businesses;
- child-headed households / businesses;
- sick and infirm;
- elderly; and
- physical disabled PAPs.

There is only 1 vulnerable PAP in in the existing market and 50 vulnerable PAPs in the car wash area and access route respectively. Given their limited opportunities to actively engage in production they are less likely to cope to economic shocks once the project commences. That is why the entitlement framework took into account these vulnerabilities. Section 15 goes into greater details on livelihood and income restoration strategies.

9. Role of NGOs in Livelihoods Restoration

The Street Child of Sierra Leone (SCoSL) as well as Child Fund NGOs, have been identified to support the affected PAPs, especially children, with education programmes and livelihood restoration measures. These NGOs will operate in conjunction with the RAP Implementation team, MoTA correspondingly. The NGOs are expected to fulfil the following key roles:

- liaise with local community structures in the resettlement process to facilitate smooth compensation process;
- support PAPs to strengthen their businesses through training in key business skills;
- provide peer support and access to markets, networks and capital;
- provide support on grievance management;
- develop and facilitate training and skills development for identified households on the following;
 - Financial management;
 - Health and sanitation; and

- RAP Implementation and monitoring.

10. Grievance Mechanism

The grievance redress mechanism proposes the creation of a committee to oversee this process and discourages litigation except as a last resort. Emphasis is laid on full Resettlement of PAPs and addressing their grievances before actual project commencement.

We believe that most grievances are anticipated to be based on property or business valuation. These are likely to arise when households consider compensation values for their assets insufficient, or if PAPs misunderstood the compensation process and believe they are entitled to additional compensation. While some grievances would be resolved by the committee, others might not, such as when claimants contest compensation rates developed by the valuer. MoTA will form a grievance committee comprising its staff RAP IC, local leaders and members of the identified NGOs. Despite the grievance procedure, if the aggrieved persons are not satisfied with resolutions of the Grievance Committee at local level they will have the choice of resorting to courts of law.

The grievance mechanism is intended to warrant that PAPs have opportunity to access the project and have their concerns addressed. Furthermore, the mechanism will ensure that the project becomes active in identifying solutions to grievances. The grievance procedure will however not replace the existing legal process in Sierra Leone, but based on consensus, it will seek to resolve issues quickly so as to accelerate receipt of entitlements and smooth resettlement without resorting to expensive and time-consuming formal legal action.

11. Monitoring and Evaluation

Monitoring and evaluation will be a continuous process that will seek to provide the World Bank, MoTA, MoF and other relevant stakeholders with feedback on RAP implementation. The Monitoring and Evaluation Plan (MEP) will be firmed up when the Engineering design is completed. It is suggested that the independent consultancy group assisting with Resettlement Planning and implementation will also be involved in the monitoring process and is given the task of preparing a monitoring plan.

Monitoring and evaluation will be done from both internal and external perspectives.

Internal Monitoring

The objective of internal monitoring and supervision will be:

- to verify that the valuation of assets lost or damaged, and the provision of compensation, resettlement and other rehabilitation entitlements, has been carried out in accordance with the resettlement policies provided by the Government of Sierra Leone (GOSL) and the World Bank;
- to oversee that the RAP is implemented as designed and approved; and
- to verify that funds for implementation of the RAP are provided by the Project authorities in a timely manner and in amounts sufficient for their purposes, and that such funds are used in accordance with the provisions of the RAP.

External Monitoring

External monitoring is carried out by designated NGOs. The External monitoring group will monitor the resettlement and compensation process and implementation of requirements to verify that compensation, resettlement and rehabilitation have been implemented in accordance with the agreed RAP provisions. It will also be involved in the complaints and grievance procedures to ensure concerns raised by PAPs are addressed.

More specifically, the NGOs will be responsible to carry out the following:

- review the results of the internal monitoring and review overall compliance with the RAP;
- assess whether relocation objectives are being met;
- assess general efficiency of relocation and formulate lessons for future guidance; and
- determine overall adequacy of entitlements to meet the set objectives.

Section 13 of this report goes into greater details regarding monitoring and evaluation processes.

12. Consultation and Public Disclosure Plan

Section 9 of this report highlights public consultation sessions that were held with PAPs and various stakeholders. These included face to face interviews, focus group discussions and general meetings.

These consultations also took place at the relocation site with existing operators and other stakeholders in the area. Section 9 further focusses on key stakeholders in each of the project areas and highlights their different roles as well as their main concerns and outcomes. These consultations also included consultations on the design of the new market to complement consultations already carried out by the design engineers, and feedback was provided to the design engineers. Stakeholders were informed about the proposal to have a market to rehouse the displaced market people from the Lumley-Juba road at the site of the marshy ground. At the front end of the car wash site, a dedicated car park will be constructed to accommodate vehicles that would otherwise park along the Lumley Juba road. The design of the multi-storey car park and market would incorporate:

- water and sanitation facilities as part of the design of the Terminal and Market.
- a waste management and treatment plan as part of the sanitation facilities.
- the removal of all the domestic waste and desilting of the material currently clogging the drains behind and adjacent the proposed site to ensure that flooding does not occur during the rainy season.

13. Schedule of Implementation of Activities

Section 15.2. of this report proposes a schedule for implementation of activities and time estimates for the completion of the entire resettlement process. Prompt and fair compensation and clear sources of funding are recommended as ways to ensure timely implementation of the proposed project.

An expanded Resettlement Working Group with representatives from all relevant stakeholders will assist with Project implementation. Within the committee, sub-committees may be formed to focus on various aspects of resettlement such as resettlement sites and space allocation, capacity building, income restoration and grievance redress. Proper implementation hinges on a detailed RAP budget that carefully estimates all costs associated with the RAP exercise, including social costs.

For each sub-project, the resettlement schedules will be coordinated with construction schedules. Before any project civil works activity is implemented, PAPs will have to be compensated in accordance with national laws and World Bank resettlement laws, regulations and guidelines as set in the RPF. In other words, no individual or affected household should be displaced due to civil works activity before compensation is paid and resettlement sites with adequate facilities are prepared and provided for to the individual affected.

It is assumed that project preparation including completion of design and procuring the services of a contractor will be completed within the next six months. It is projected that construction will last for 24 months.

14. Implementation Budget

The total cost of the RAP is estimated to be **USD 1,854,927** (*one million, eight hundred and fifty four thousand, nine hundred and twenty seven US Dollars*).

The following tables give breakdowns of costs per RAP component, including compensation and allowances, and costs for various related programmes/aspects.

Final estimated compensation cost

Cost Category	Cost (Le)	Cost (\$)
COMPENSATION AND ALLOWANCES		
Compensation for loss of structures	4,170,540,000	496,493
Compensation for loss of assets (fixtures)	0	0
Compensation for loss of land	742,197,456	88,357
Estimated cost of Garage within Option 3*	798,000,000	95,000
Compensation for loss on income	613,500,000	73,036
Compensation for loss of crops	0	0
Moving allowance	286,750,000	34,137
Special payment	245,900,000	29,274
Subtotal	6,856,887,456	816,297
Restoration of public utilities		75,000

Cost Category	Cost (Le)	Cost (\$)
New taxi park to replace park at Congo cross		150,000
Rehabilitation of Peace Market, Ferry Junction		100,000
Livelihood restoration programmes		200,000
Independent consultancy for resettlement management		200,000
Administrative and planning costs		40,000
External monitoring of resettlement		30,000
Capacity building, resettlement committees and relocation assistance		75,000
Annual Audit		
Subtotal		870,000
Total		1,686,297
Contingencies		168,630
Grand total		1,854,927

* See Note number 2

Compensation cost per Area

Cost Category	Cost (Le)	Cost (\$)
COMPENSATION AND ALLOWANCES		
Car Wash	3,606,650,000	429,363.10
Existing Market	369,800,000	44,023.81
Access Road (Option 3)	1,912,437,456	227,671.13
Compensation for garage on access road*	798,000,000	95,000.00*
Congo Cross Car Park	1,290,996,000	153,690
Ferry Junction	979,003,200	116,548
Subtotal	8,956,886,656	1,066,296.04

*See note number 2

The following should be noted in relation to the costs:

1. Only the access road option three has been taken into account in this budget (options 1, 2 and 4 are not included). The latest version of this option now by-passes 2 major structures which were included in the original assessment; the related costs have subsequently been knocked off.
2. Access road option 3 passes partially through a garage at Lumley, for which permission was not granted (by the owner) to assess. As such an estimated cost of USD 95,000 has been included as compensation for the land.
3. We have also costed for a new Taxi park at Congo cross as we have assumed this land needs to be purchased.
4. We have estimated the cost of replacing public utilities.

1.0 INTRODUCTION

1.1 Rationale for the Project

The city of Freetown is severely impaired by poor infrastructure, poor management of road space, an inadequate public transport system and a weak institutional and regulatory framework. Concerned at the worsening urban transport situation in the city, the Government of Sierra Leone requested the World Bank to support the preparation and implementation of an urban transport project to address short term issues and develop a long-term strategic plan. Towards the achievement of the short- term objective, the Ministry of Transport and Aviation has developed a project comprising several interventions to address these problems. The project entails the following interventions:

- vi. Establishment of a transit car park at Lumley Community (Kinston Upon Hull Way) on the site that is currently serving as a market;
- vii. Construction of a transit market at Lumley Community (currently a site for car parks) to relocate street traders;
- viii. Options to reduce conflict between vehicles and pedestrians at:
 - Juba Road
 - Regent Road Lumley
 - Lumley Beach Roundabout (Kingston Upon Hull Way)
- ix. Improvements in
 - Congo Cross circle
 - Kissy Ferry Junction; and
- x. Improvements in Tagrin, Kissy and Government Wharf ferry terminals

The first two interventions listed will involve physical relocation.

- 1) The establishment of a transit car park at Lumley community will cause relocation of traders and hawkers working in the current market and car park and
- 2) The relocation site for the market is partly occupied by few structures, market operators and car park. Therefore relocation to this site will cause a) houses and businesses currently located in the proposed site b) houses and businesses along the road to Lumley beach to be resettled.
- 3) Street traders operating along the Lumley Juba road will be relocated to the relocation site

Other options to reduce conflict between vehicles and pedestrians at Juba road, Regent road Lumley and Lumley beach roundabout envisaged involve engineering related improvements and enforcement measures.

The fourth intervention which entails improvements in Congo cross circle and Kissy Ferry junction is unlikely to involve any physical relocation but may warrant some economic displacement considerations.

The improvements envisaged in Tagrin, Kissy and Government wharf ferry terminals are of a minor nature and would not warrant any resettlement.

This project will not only improve mobility of vehicles and pedestrians in the areas specified above but will also enhance road safety as well as contribute to the enhancement of institutional capacity to plan and manage urban transportation in the municipality of Freetown.

The Government of Sierra Leone has prepared an Environmental Social and Health Impact Assessment (ESHIA) and this Resettlement Action Plan (RAP) to assess the potential risks and impacts and proposed mitigations measures to address these during project implementation. These two instruments are required to be prepared in accordance with national laws and the World Bank's Environment and Social policies, as set out in the respective Environmental and Social Management Framework (ESMF) and the Resettlement Policy Framework (RPF) which have been prepared.

1.2 Efforts to Minimise Resettlement

The following efforts were made to minimise involuntary physical resettlement and/or economic displacement of the Project Affected Persons (PAPs). These included the following:

- pre-design walk-throughs;
- resettlement workshops;
- consultation with the potential PAPs; and
- engagement engineers on the designs so as to influence for decision that would have minimum resettlement and/or compensation impacts.

Effort 1: Pre-design walk-throughs

These pre-resettlement walk-throughs were undertaken during June, October and November 2018. The teams were made up of Engineers as well as Health and Safety specialist from CEMMATS Group Limited and MoTA, including Resettlement, Environment and Social specialists as well as Community Leaders and Ward Councillors responsible for affected areas respectively. During the walk-throughs, the teams identified resettlement impacts that could be avoided and made necessary recommendations. This helped to eliminate resettling and/ or compensating those within the areas whose impacts would be avoided, identify impacts within the areas that could be avoided, minimise disruption to the community and mitigate likely social tension.

Effort 2: Resettlement workshops

The CEMMATS resettlement, stakeholder engagement as well as Environment, Social, Health and Safety teams conducted workshops within each area to present the project and reinforce the principles of resettlement and discussed resettlement grievance redress mechanism. This would benefit the contractor's community engagement activities and would eventually reduce resettlement-related grievances during the construction process. In addition, during these workshops the team received very valuable information from stakeholders and communities that assisted the team in finding other ways of minimising resettlement. These valuable inputs were passed to engineers, so they could amend their designs accordingly.

Effort 3: Consultation with key stakeholders and potential PAPs

Consultation with officials of FCC, different Government Ministries, SLRA, community leaders, and other representatives of the affected population was essential to gaining full understanding of the types and degrees of adverse project effects and how these effects could be minimised. Inputs and suggestions from these consultations helped engineers to amend their designs and thus reduce the likely impact of resettlement. The Resettlement, Environment, Social, Health and Safety teams consulted with potential PAPs during undertaking of the Environmental Impact Assessment stage as well as during undertaking of census and socio-economic surveys.

Results of efforts to minimize resettlement

The efforts aimed at minimising resettlement of potential PAPs resulted in general reduction in the number of persons potentially displaced in each area and a reduction in economic displacement/compensation. Specific efforts included the following:

- avoidance of homes/structures to avoid loss of shelter;
- identified alternative alignments that would avoid or reduce impact to existing structures and businesses and thus avoid impacting many households and businesses thus minimising loss of income and impacts on livelihood; and
- identified alternative alignment of right-of-way and for locating project infrastructure.

1.3 Need for a Resettlement Action Plan

Task 2 of the Request for Proposal (RFP) calls for the preparation of a Resettlement Action Plan (RAP) in line with the principles, procedures and processes outlined in the RPF using the most recent and accurate information on the: (i) proposed resettlement and its impacts on displaced persons and other adversely affected groups; and (ii) legal issues affecting resettlement. The RAP will cover elements that are specific to the selected locations in the project context.

The following sections of the RAP correspond to the scope of work required under the consultancy:

- undertake stakeholder consultation of all project affected persons and communities, making sure that both women and men are consulted, as well as people with disabilities;

- outline means or ways by which grievances can be addressed;
- conduct a census of all project affected persons and communities;
- develop eligibility criteria for resettlement/compensation in close collaboration with the Project Affected People;
- undertake an inventory of properties affected and assessment of the affected assets and establish compensation entitlement matrix based on the findings of the census;
- develop a Grievance Redress Mechanism which incorporates existing local practices and the proposed structure outlined in the RPF;
- develop a form for recording complaints and attach this as annex to the RAP;
- prepare a comprehensive RAP report taking into account the national laws and the standards and requirements of the World Bank safeguards policies (OP4.12); and
- develop and enter a GIS linked database of affected assets, affected PAPs, asset valuations, records of complaints and other data.

2 PROJECT DESCRIPTION AND DESIGN CONSIDERATIONS

For simplicity the project has been logically split into the following aspects related to the operational areas:

- i. Lumley/Aberdeen axis; and
- ii. Congo cross/ Ferry junction crossings

2.0 Project Description

Lumley/Aberdeen axis

Juba Road, Regent Road and Lumley Beach Roundabout are major intersections on the Peninsular Highway within Lumley Community. These are paved roads with approximately 6m width carriageway and side drains that traverse through a built-up environment. One of the main causes of traffic congestion within the Lumley-Aberdeen Axis is the market structure along the Peninsular Highway. This market is overcrowded with a number of traders spilled over on the pedestrian sidewalks and a portion of the carriageway of the road. Other infrastructure along the roads and intersections includes, residential houses (flats/storey buildings), churches, shops, pharmacies, gas stations and commercial buildings. Generally, the roads within Lumley-Aberdeen Axis are burdened with concentrated trading activities on the pedestrian sidewalks, side drains and some portions of the carriageways. There are no specified parking spaces especially for public transport such as motor-bikes, tricycles, taxis and mini buses that are required to wait for commuters. Consequently, a high rate of vehicle traffic congestion and accidents is experienced within this area as most of these parks on the available sections of the roads to pick up commuters.

If we take into account the considerable number of shoppers shopping for merchandise and food items from the shops and the street markets as well as enclosed perishable market, Lumley is an extremely busy area with all kinds of people. Taking into account the extremely high population now living in areas along the peninsular and the Juba Road representing the only outlet currently to these areas, it has become imperative that the traffic problem is addressed.

The decrease in the capacity of the roads is caused by the following factors:

- increase in the number of motorized means of transportation;
- multiple obstacles on the roads (namely, trading activities, unlawful parking and pedestrian activities);
- inadequate parking spaces; and
- lack of enforcement for suitable traffic control and measures.

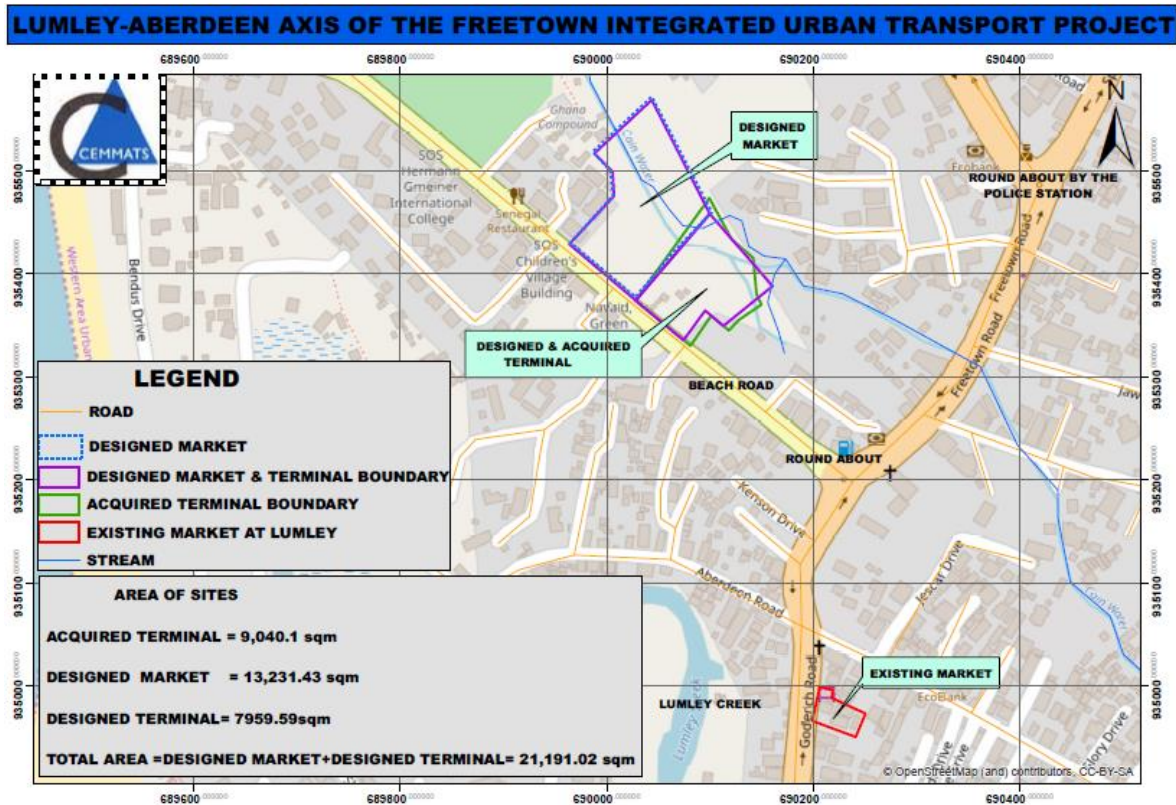


Figure 2.0-1: Lumley Aberdeen axis. Source: CEMMATS

Congo Cross/Ferry Junction Crossings

Congo roundabout has four approaches including, Old Signal Hill Road, King Street, Main Motor Road Congo Cross and Wilkinson Road and these provide access towards Old Signal Hill, Wilberforce, Murray Town, Aberdeen and Freetown city centre. The diameter of the roundabout measures approximately 25metres and provides a circulatory width of approximately 6 metres. Presently, the four approaches are paved roads with concrete covered side drains which are normally used as sidewalks. Main Motor Road Congo Cross and Wilkinson Road are dual carriageways, whereas King Street and Old Signal Hill Road are single carriageways. There are zebra cross walks for pedestrians on each of the approaches about 20m from the roundabout. Other infrastructure around the Congo Cross Circle includes, residential houses, police station, school, mini marts, pharmacy, bank, shops, entertainment bar and a taxi park on the Old Signal Hill Road close to the intersection.

The four-way intersection at Kissy Ferry Junction includes a crossing over of Bai Bureh Road which is a dual carriageway perpendicular to the Ferry Road (single carriageway). Lay-bys at the intersection along the Bai Bureh Road are usually occupied by motor-bikes and tricycles. This is a mixed-used developed community which comprises of residential, commercial, cultural, institutional and entertainment facilities. Bai Bureh Road / Ferry Terminal forms one of the main intersections when approaching Freetown from the east and provides access to the Kissy ferry terminal.

Vehicular traffic congestion is usually experienced around the Congo intersection during peak hours in the morning and evening. The existing overall traffic flow at the roundabout is unbalanced with most of vehicles on Main Motor Road and Wilkinson Road to or from the Central Business District (CBD). The cross-road intersection at Ferry Junction is presently an uncontrolled traffic system with conflict between vehicles and pedestrians (Figure 2.1.2). However, there are relatively fewer delays at this intersection. Therefore, the interventions proposed at the Junction are to improve pedestrian safety by introducing traffic control and management measures (Figure 2.1.3).

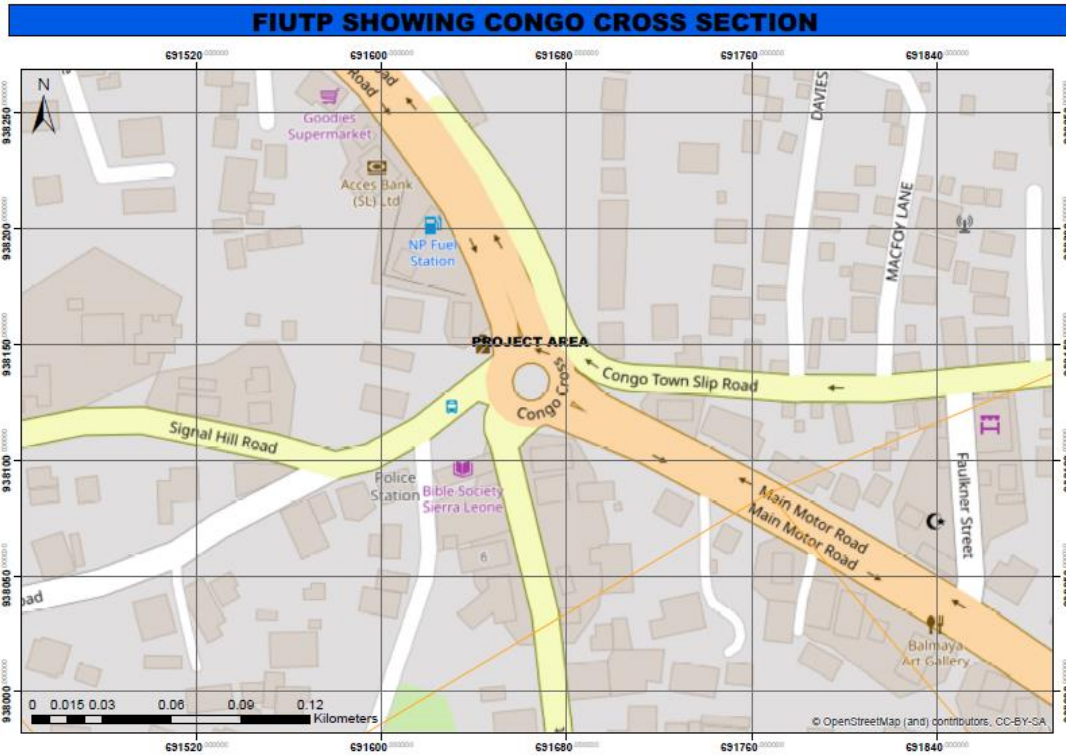


Figure 2.0-2: Map of Congo cross roundabout. Source: CEMMAT

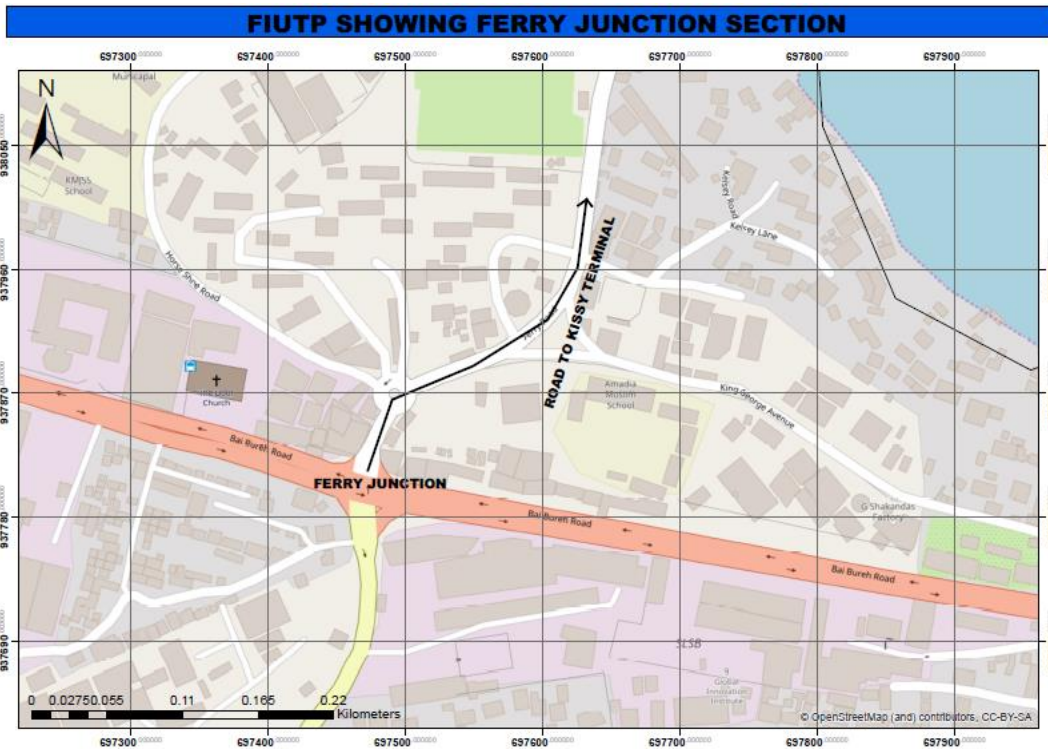


Figure 2.0-3: Map of Kissy Ferry junction terminal. Source: CEMMATS

2.1 Proposed interventions

The following table lists the proposed interventions and describes the improvements envisaged. Not all of them will however require resettlement considerations.

Proposed Interventions	Description of Improvement	Implications for OP 4.12
1. Establishment of transit car park at Lumley Community (Kinston Upon Hull Way)	<ul style="list-style-type: none"> rehabilitation of existing ground conditions flood prevention resettlement of existing traders / residents vehicle access arrangements. 	This will entail both physical and economic displacement of PAPs at both the Lumley market and car wash site triggering OP 4.12.
2. Construction of transit market at Lumley Community to relocate street traders	<ul style="list-style-type: none"> relocation of existing street traders construction of market improvement/ rehabilitation of access roads 	<ul style="list-style-type: none"> This will entail both physical and economic displacement of PAPs at both the Lumley market and car wash site triggering OP 4.12

Proposed Interventions	Description of Improvement	Implications for OP 4.12
	<ul style="list-style-type: none"> • formalizing pedestrian footways • improving road safety • management of road-space following relocation 	
<p>3. Options to reduce conflict between vehicles and pedestrians at</p> <p>i. Juba Road</p> <p>ii. Regent Road Lumley</p> <p>iii. Lumley Beach Roundabout (Kingston Upon Hull Way)</p>	<ul style="list-style-type: none"> • improve junction control • enforcement • provide on-street parking • road rehabilitation 	<ul style="list-style-type: none"> • No resettlement and therefore OP 4.12 will not be triggered
<p>4. Improvements in</p> <p>i. Congo Cross circle</p> <p>ii. Kissy Ferry Junction</p>	<ul style="list-style-type: none"> • improve traffic management • improve signalization • improve pedestrian circulation • resettlement of existing traders along segments of the roads. 	<ul style="list-style-type: none"> • OP 4.12 involving minor physical and economic displacement will occur at both Congo cross and Ferry junction. At Congo cross the taxi park will be relocated to adjacent land within 100 metres of the existing park site. The impacts are captured in this report. At Ferry junction, traders occupying walkways along the road will be relocated to the “Peace park” within 200 m of the junction. The impacts are also captured in this report.

Lumley/Aberdeen axis

In order to improve the efficiency of traffic network on the roads within the Lumley – Aberdeen axis, the establishment of a transit car park and market is proposed at the Lumley Community. The design phase of the project has included a number of surveys and investigative techniques to determine the baseline conditions that will form basis for the designs. Of the 21,036.89 square meters area at the car wash site, 9,328 square meters is marshy ground which is currently unused but was previously used for agricultural purposes. The plan is to remove traders from the Lumley perishable market and the street traders spreading their wares on the Lumley Juba road to be resettled into the Lumley car wash area. The various types of vehicles and motorbikes which park along this road and cause traffic problems will be moved to a properly designed car park at the car wash site. The activities at the car wash site would therefore change considerably. At the far end where there is marshy ground it is proposed to have a market to rehouse all the displaced market people on the Lumley- Juba road. At the front end of the car wash site a dedicated car park will be constructed to accommodate vehicles that would otherwise park along the Lumley Juba road.

Work planned at the car wash site includes:

- rehabilitation of existing ground conditions and flood prevention;
- Construction of market;
- improvement /rehabilitation of access roads;
- formalising pedestrian footways;
- improving road safety; and
- management of road-space following relocation.

The design of the facility would include:

- water and sanitation facilities as part of the design of the terminal and market.
- a waste management and treatment plan as part of the sanitation facilities.
- the removal of all the domestic waste and desilting of the material currently clogging the drains behind and adjacent the proposed site to ensure that flooding does not occur during the rainy season.

The proposed intervention at the Juba Road, Regent Road and Lumley Beach Roundabout will involve review of existing geometrical designs along the roads and intersections. The main objective is to improve traffic flow and address safety issues within the project areas. This will include introduction of traffic measures and management for the road networks.

The proposed intervention are as follows:

- improve junction control;
- traffic enforcement ;
- provide on-street parking; and

- road rehabilitation.

Congo cross/Ferry junction crossings

The proposed intervention at these crossings will be done with the objective of improving traffic flow and addressing safety issues within the project areas. This will include introduction of traffic measures and management for the road networks.

Design consideration for Congo cross circle and Kissy Ferry intersection will involve review of existing geometrical designs along at intersections and lay-bys. The main objective is to improve traffic flow and address safety issues within the project areas. This will include introduction of traffic management systems and signalization at the intersections.

The proposed interventions are as follows:

- improve traffic management;
- improve signalization; and
- improve pedestrian circulation.

To reflect the project design aspirations, a survey was conducted at the Congo cross intersection, from the centre of the intersection, within 183m towards the Wilkinson road, 175m towards the Congo Cross Bridge, 100m into Signal Hill and 70m into King street.

Petty traders and hawkers have occupied various walkways around the area. All structures on the existing walkways are movable including wooden tables and stools, metal kiosks, metal tables and hawkers, covered with umbrellas. A few traders at this intersection only come to sell at the location in the evening hours (as reported by other traders met on site), but left their stools and kiosks on site. The Congo cross intersection has a taxi park with non-physical demarcation that splits the road from Signal road into two. Several taxis and motorbikes have made a cordoned off area on the street into a parking lot. The engineering design calls for removing this taxi park from the area altogether. An area covering approximately four (4) town lots has been identified within 200 m of the intersection on Signal Hill road. This private property, the subject of a current court case has been cordoned off from the street by corrugated zinc sheets. This is the alternative location in the neighbourhood acceptable to the taxi drivers and bike riders in the taxi park. This situation has been discussed with the Ministry of Lands, Country Planning and the Environment. The Ministry has opined that it will use statutory powers available to it under the laws of Sierra Leone to compulsorily acquire this land for public use and has embarked upon such arrangements. The legitimate land owner will be compensated. The site itself is considerably larger than the existing Taxi Park and will present very little environmental and social problems. The site would however need to be properly planned to address environmental and social concerns and meet the needs of the drivers and bike riders. These will include but will not be limited to:

- making toilet facilities available at the site;
- provide a seating bay and a food selling area in the park;
- provide waste receptacles at the site;
- provide a small office for drivers' union and bike riders' union officials;

- make plans for a proper entrance and exit and make arrangements with the Police at Congo cross for the orderly operation of the facilities. The Freetown City Council and the SLRSA should also be involved in such arrangements.

To reflect the project design aspirations, a survey was also conducted at the Ferry Junction intersection, from the centre of the intersection, within 201m from both sides of the Bai Bureh Road, 60m towards the ferry terminal and 100m towards “Old road”. All structures (movable or immovable) existing walkways were enumerated. In few areas at this intersection, walkways were very difficult to identify given that the last road construction/rehabilitation left no walkways. On one side of the intersection, structures are characterised by shanty makeshift structures which are used mainly for trading of cooked food, cosmetics and other wares. A few tyre repair service places and resting places (“long bench”) for drivers could also be found on the site.

It is planned to relocate all the affected traders to the adjacent “Peace Market” within 200 metres of the intersection. The “Peace market” is almost empty but has been encroached upon by people constructing houses. The market however has the capacity to accommodate all the affected traders. Because it is largely unplanned, consideration should be given by the government to sort out the problem of encroachers into this market and properly plan the market. For the purpose of this resettlement, since there is ample space in the market, provision will be made for a covered shelter within the market to cater for the displaced traders. Interviews with the traders indicated they are willing to relocate, providing ample provision is made for them at the market.

Apart from covered space, such provision will include but will not be limited to:

- making toilet facilities available at the site;
- provide waste receptacles at the site.

It should be noted that at both intersections, traders affected were willing to move providing they could be included in the relevant compensation packages. These have been reflected in the entitlements. The traders at Congo cross mainly had mobile structures. Those at the Ferry Junction included few who would be given space at the “peace market”. There were no disabled enumerated amongst the PAPs. The socio-economic situation as regards the PAPs were well captured in the census and are not dissimilar to those at the Lumley market area, Tagrin, Kissy and Government Wharf Ferry Terminals. The work scope in these areas is fairly limited and no resettlement issues are envisaged.

Potential Impact on land and Livelihood

The three project activities that cause resettlement are 1) establishment of transit car park at Lumley Community (Kinston Upon Hull Way) 2) Construction of transit market at Lumley Community to relocate street traders 3) Improvements in Congo Cross circle and Kissy Ferry Junction. The project activities will improve the conditions of the market operators by providing market space, reduce exposure to traffic accidents by providing dedicated market site and facilities such as toiletry and water.

These in turn would improve the general conditions of the market and attract potential customers. The project activities in all the three sites would require a total land size of 17.3 ha of land and both temporary and permanent structures will be affected. The majority of the PAPs (558 out of 914) are street vendors and the main impact on livelihood will be due to loss of income caused by the disruption and transition to new relocation site.

3 LEGISLATION AND REGULATORY FRAMEWORK

The preparation and implementation of this RAP is guided by the applicable national legal framework of Sierra Leone and the World Bank's operational policy on involuntary resettlement (OP 4.12)

3.0 Legislation Related to Resettlement

The following national legislations are related to this resettlement in Sierra Leone:

- Constitution of Sierra Leone 1991;
- National Environmental Policy (Revised Edition – October, 1994);
- The Local Government (Amendment) Act, 2004/2017;
- National Land Policy 2015;
- Agricultural Policy (April, 2007);
- Environmental Protection Agency Act (2008);
- The Sierra Leone Roads Authority (Amendment) Act (2010);
- The Road Transport Authority Act (1996) (Amended to the Roads Safety Authority Act (2016);
- The Road Maintenance Fund Administration Act (2010);
- The Road Traffic Act (2007);
- The Sierra Leone Road Safety Authority (Amendment) Act, 2016;
- The Maritime Administration Act, 2000;
- National Water Resource Management Agency Act, 2017;
- The Integrated Transport Policy, Strategy and Investment Plan, 2013;
- National Biodiversity Strategy and Action Plan (2003).

Constitution

The Constitution includes provisions to protect the right of individuals to private property, but Section 21 of the Constitution also sets principles under which citizens may be deprived of their property in the public interest. Consequently, the Constitution upholds the fundamental rights of citizens to own property and receive support from the State when that property is compulsorily acquired by the State. Furthermore, it also makes provision for the prompt payment of adequate compensation and access to the court or other impartial and independent authority for the determination of the land owner's interest or right, and the amount of any compensation to which he is entitled and for the purpose of obtaining prompt payment of that compensation.

Section 21 of the constitution relating to “Protection from deprivation of property”, states thus:

21. (1) No property of any description shall be compulsorily taken possession of, and no interest in or right over property of any description shall be compulsorily acquired, except where the following conditions are satisfied, that is to say:

- a) the taking of possession or acquisition is necessary in the interests of defence, public safety, public order, public morality, public health, town and country planning, the development or utilization of any property in such a manner as to promote the public benefit or the public welfare of citizens of Sierra Leone;
- b) the necessity therefore is such as to afford reasonable justification for the causing of any hardship that may result to any person having any interest in or right over the property; and
- c) provision is made by law applicable to that taking of possession or acquisition.

Relevance to the project: The Constitution of Sierra Leone (1991) makes provision for the protection of the rights of individuals to private property (Section 21), but it also makes provision for the compulsory acquisition of land where it is in the public interest. Critically, the Constitution requires that where individuals are deprived of their property, they are provided with prompt and fair compensation.

National Environmental Policy (Revised Edition – October, 1994)

This National Environmental Policy seeks to achieve sustainable development in Sierra Leone through the implementation of sound environmental management systems which will encourage productivity and harmony between man and his environment. It also promotes efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of nationals; to enrich the understanding of ecological systems and natural resource importance to the Nation. Thus, the key objective of the policy is to secure for all Sierra Leoneans a quality environment that can adequately provide for their health and well-being.

Relevance to the project: The Environmental Protection Agency Act 2008 makes provision for the consideration of socio-economic impacts, including displacement, to be included in the preparation of an Environmental Impact Assessment. Provisions are also made for the disclosure of the EIA Report.

Local Government Act (2004)

The Local Government Act deals with the establishment and operation of local councils around the country to enable meaningful decentralisation and devolution of Government functions. It stipulates that a local council shall be the highest political authority in the locality and shall have legislative and executive powers to be exercised in accordance with this Act or any other enactment. It shall be responsible, generally for promoting the development of the locality and the welfare of the people in the locality with the resources at its disposal and with such resources and capacity as it can mobilise from the central government and its agencies, national and international organisations, and the private sector.

The local council should initiate and maintain programmes for the development of basic infrastructure and provide works and services in the locality. A local council shall cause to be prepared a development plan which shall guide the development of the locality. The schedules to the Local Government Act outline the activities of various MDAs that have been devolved to local councils.

Relevance to the project: The Act will be important based the role that FCC, as a key stakeholder will play in the project. The Act provides for the establishment of localities and local authorities; provides for functioning of local authorities; defines functions and powers of local councils and councillors; and establishes the Local Government Service Commission, the Local Government Finance Committee and the Inter-Ministerial Committee on decentralization. The statutory laws recognize private freehold land in Freetown and the Western Area (previously a British colony), while land in the three additional provinces (previously a British protectorate) is governed by customary law with chiefs serving as custodians.

Under this above regime, land may be classified as state land, private land or communal land. Land tenure arrangements for the project are likely to be a combination of all three land tenure types. However, given the urban context and the presiding regulatory framework, most of land tenure is likely to be state and private land.

National Lands Policy (2015)

The new National Land Policy is the guideline in the administration of, management, control, planning and execution of land matters in Sierra Leone. The Policy aims at the judicious use of the nation's land and its entire natural resources by all sections of Sierra Leone society in support of various socio-economic activities undertaken in accordance with sustainable resource management principles. The principles of the land policy include among others:

- principle of land as a common national or communal property resource held in trust for the people and which must be used in the long term interest of the people of Sierra Leone. This principle only holds where it does not violate existing rights of private ownership;
- compensation to be paid for lands acquired through compulsory government acquisition will be fair and adequate and will be determined, among other things, through negotiations that take into consideration government investment in the area; local authorities (City and District Councils) may negotiate for land for project development purposes, but all such grants should be properly documented and processed;
- no interest in or right over any land belonging to an individual or family can be disposed of without consultation with the owner or occupier of the land; and
- no interest in or right over any land belonging to an individual or family can be compulsorily acquired without payment, in reasonable time, of fair and adequate compensation.

The law governing interest in land in the Western area is partly derived from the English law based on what used to exist in England, partly by Act of Parliament including the Constitution of Sierra Leone Act No. 6 of 1991 especially section 21 and all amendments made thereto. Here, the law regulating acquisition of land and compensation is governed by the Public Land Act, Cap 116 of the laws of Sierra Leone 1960 particularly Sections 4,5,6,7,8,9,10, 15,16,18, and 19 etc of the Act (i.e. CAP 116 of the laws of Sierra Leone 1960).

Relevance to the project: Under Sierra Leone law, compensation is usually made in cash for the actual value of the land, as well as for damages to property sustained by reason of the appropriation. According to Cap 116 and Cap 119, factors to be considered in determining just compensation are:

- the market value of the land at the date of the publication of the warrant;
- damage sustained as a result of the severance of affected land from the remainder of the person's land;
- general damage;
- expenses involved if the person is forced to change his occupation or place of business;
- damage suffered by people having other rights over the land.

Environment Protection Agency Act (2008)

The Environment Protection Act Agency of 2008 was prepared after the National Environmental Policy and it alludes to the creation of a National Environmental Protection Agency and makes provision for carrying out an Environmental Impact Assessment (EIA) prior to certain development activities. It also establishes the legal and regulatory framework for monitoring the implementation of sound environmental management practices.

Part IV of the EPA Act exclusively deals with the activities and requirements of an EIA. This part of the Act emphasises the processes and procedures leading to the acquisition of an environmental licence with respect to the conduct of fully acceptable EIA studies. It further stipulates the duties and obligations of both the environmental licence holder and the Board of Directors in the event that an environmental licence is granted.

Section 24 (1) of the Act submits that an EIA is demanded for certain types of project activities for which any person who wishes to undertake or cause to be undertaken any of the projects set out in the first schedule shall apply to the agency for a licence.

Projects requiring an EIA are those as given in the first schedule (Section 24) of the Act, whose activities involve or include the following:

- exploitation of hydraulic resources (e.g. dams, drainage and irrigation projects, water basin development, water supply);
- infrastructure (e.g. roads, bridges, airports, harbours, transmission lines, pipes, railways);
- industrial activities (e.g. metallurgical plants, wood processing plants, chemical plants, power plants, cement plants, refinery and petro-chemical plants, agro-industries);

- extractive industries (e.g. mining, quarrying, extraction of sand, gravel, salt, peat, oil and gas);
- waste management and disposal (e.g. sewage systems and treatment plants, landfills, treatment plants for the household and hazardous waste); and
- housing construction and development schemes.

The second schedule (Section 25) of the Environmental Protection Act 2008, gives several factors which determine whether a potential project, necessarily has to prepare an EIA for approval to implement its activities on the environment.

The third schedule (Section 26) of the Act indicates the contents to be considered in preparing the EIA. It is stated in this Act, that an EIA shall contain a true statement and description of:

- the location of the project and its surroundings;
- the principle, concept and purpose of the project;
- the direct or indirect effects that the project is likely to have on the environment;
- the social, economic and cultural effect that the project is likely to have on people and society;
- the communities, interested parties and Government ministries consulted;
- any actions or measures which may avoid, prevent, change, mitigate or remedy the likely effect on people and society;
- any alternatives to the proposed project;
- natural resources in the locality to be used in the project;
- the plans for decommissioning of the project; and
- such other information as may be necessary for a proper review of the potential environmental impact of the project.

The minister has the authority as stated in section 33, to make regulations that would make it incumbent on the project owner to acquire and maintain an insurance or other appropriate financial security. This is to guarantee payment of compensation for any damage, resulting from the operations of the project, or to guarantee payment for preventive measures or for rehabilitation where necessary.

The instrument to this Act entails procedures set by the Agency for the application of an Environmental Impact Assessment Licence and the licence fees. Once submitted, the Director will solicit comments on the EIA from Board members and professional associations. EPA-SL will determine whether the report adequately meets expectations. The report will be gazetted and passed on to professional bodies for review. The proponent will have to disclose the report at a minimum of two locations after advertisements in a newspaper. Announcements may also be made in one of more local languages. Through the public participation exercise, comments will be made on the report which must be taken into consideration in revising the document. After this stage, the Board may accept or reject the report.

A licence will be issued after the approval stage for which there is a prescribed fee. The proponent may seek legal redress if the EIA is rejected.

Licenses are typically issued for a twelve-month period. Once the license is issued, EPA-SL is responsible for monitoring projects and their environmental impacts to verify compliance. At the expiration of this period, the Director has the authority to renew or revoke the license.

Relevance to the project:

- **Enforcement and Compliance.** The Agency ensures compliance with laid down environmental impact assessment procedures in the planning and execution of development projects, such as this one, including compliance in respect of existing projects.
- **Environmental Impact Licensing.** The Agency reviews and approves environmental impact assessments and environmental impact statements submitted in accordance with the EPA Act of 2008 or any other sector law.
- The Agency is responsible for the creation of public awareness of the environment and its importance to the economic and social life of Sierra Leoneans.
- **Strengthen private sector involvement in Environmental Management.** Liaise with the private sector, non-governmental agencies, Community Based Organizations on issues relating to the environment.

The Sierra Leone Roads Authority Act 1992

The Sierra Leone Roads Authority Act of 1992 creates the authority of the Sierra Leone Roads Authority to create regulations pertaining to the safe usage of roads.

IRUMP will comply with the rules and regulations on vehicles and goods transportation as they apply to its operations.

- SLRA can provide specifications of all RoWs of Demarcated Roads and Non-Demarcated Roads along which project components will be installed.

Relevance to the project:

Any new roads or alteration of existing roads should be authorised by the SLRA.

The Sierra Leone Road Safety Authority Act 1996 (amended 2016)

The Road Transport Authority (Amendment) Act 2003, the act established the Corps of Traffic Wardens to complement the Sierra Leone Police Force with regard to traffic duties and by exercising the following duties:

- to control and regulate traffic;
- to render the roads free from unnecessary obstruction and ensure the free flow of traffic;
- to educate the public on road safety;
- in the case of an accident – to divert traffic from the scene when necessary;

- to divert traffic from the scene when necessary;
- to keep onlookers away and render first aid to any injured person;
- to dispatch the injured, if any, to the nearest health centre or hospital without delay;
- to report the accident to the nearest police station; and
- to enforce all rules and regulations pertaining to the conduct of road users, including pedestrians, for the promotion of road safety.

Other regulations dealing with traffic law enforcement are the Road Traffic Act (RTA) 2007 and the Road Traffic Regulation 2011. The former was introduced as a means of consolidating the laws relating to road traffic, while the later was to clarify the powers conferred on the Sierra Leone Road Safety Authority in accordance with Section 143 of the (RTA) 2007: *The Authority may make regulations generally as to the use of vehicles on roads, their construction and equipment and the conditions under which they may be used and otherwise for carrying this Act (Road Traffic Act 2007) into effect.*

Relevance to the project:

The regulation of traffic and road safety are within the purview of the SLRSA; the project should be mindful of such regulations at the design and operational phases.

The New Direction Policy Framework 2018

Sierra Leone’s Country Development Agenda is underpinned by the New Direction Policy Framework that outlines key development strategies.

In the “New Direction Manifesto 2018”, the President expressed his vision for improving transport in the Capital, Freetown by “addressing the current traffic congestion in Freetown not only by the construction of new roads but also by employing proven and practical traffic engineering mitigation measures such as the use of actuated traffic light signals, directional traffic flows, channelization, the use of pedestrian-only roadways, commercial vehicles only roadway, peak and off-peak traffic directional flows, and effective traffic enforcement, use of automated traffic signalization at key intersections in the cities of Freetown, Bo, Makeni and Kenema. It also alludes to “completing a four- lane express road from West to East Freetown within five years, widening selected roads and building new flyovers at key junctions of Lumley, Congo Cross, Model, Eastern Police, Up Gun and Cline Town”. It also mentions “providing more mass transit facilities, especially by buses in large urban areas like Freetown, Bo, Kenema and Makeni and increasing public bus services to all areas”.

3.1 National Policy or legislation on Resettlement

It should be noted that there is no single enacted local legislation or policy that governs land acquisitions and resettlement. However, it is important to make note of the following aspects regarding public disclosure and land tenure.

Land Tenure and Ownership

Land administration in Sierra Leone is governed by a dual system of law, dispersed in about twenty statutes and regulations.

In the Western Area of Sierra Leone, land tenure is governed by Property Statutes. Land is either State (publicly) owned or privately owned. The right of the state to public land is inalienable and indefeasible. Rights of occupation over public land may be granted under warrant. The state has the power, conferred by the Unoccupied Lands Act, Cap 117, to take possession of unoccupied land.

In the provinces, customary law co-exists with statute. The recognition of the force of customary law in the provinces is established by section 76 (1) of the Courts Act 1965. Through customary law, ownership of land is vested in the chiefdoms and communities: it can never be owned freehold. Land always belongs to the communities under the different forms of tenure under customary law. This principle is established by the Chiefdom Councils Act as well as by Section 28 (d) of the Local Government Act 1994.

Public disclosure

There is no national policy as such on public disclosure. However, the Environmental Protection Agency Act, 2008 (section 27(1) and (2)) states that the EPA shall circulate an EIA to various bodies and also open it for public inspection and comments in the National Gazette and newspapers for a specified time period. There are specific regulations developed by the environmental department that are currently in force.

Cultural Heritage

The National Environmental Policy (1994) provides for the collection of relevant data on biological diversity and cultural heritage. It seeks to promote socio-economic and cultural development through the preservation of biological diversity for the sustainable utilisation of natural resources. There are references to the preservation and/or respectful removal (taking into consideration cultural sensitivities) of “society bushes” for mining and other purposes in various regulations.

3.2 World Bank safeguards policies

Introduction

The World Bank Policies -Involuntary Resettlement (OP/BP 4.12), including the Environmental and Social Framework published in 2017 as well as Physical and Cultural Property (OPN 11.03) are applicable to the RAP aspect of this project. These have also been addressed in the RPF which is the basis for this RAP.

World Bank’s Operational Policy (OP) 4.12 (World Bank, 2004) is seen internationally as the global standard for involuntary resettlement guidelines.

The fundamental objective of resettlement planning, as stipulated in OP 4.12, is to avoid resettlement wherever feasible, or, where resettlement is unavoidable, to minimise its extent and to explore all viable alternatives.

Where land acquisition and involuntary resettlement are unavoidable, resettlement and compensation activities are carried out in a manner that provides sufficient opportunity for the PAPs to participate in the planning and implementation of the operation. Furthermore, if incomes are adversely affected, adequate investment is required to give the persons displaced by the Project the opportunity to at least restore their income.

The World Bank's Safeguard Policy OP 4.12 applies to all components of the Project and to all economically and /or physically affected persons, regardless of the number of people affected, the severity of impact and the legality of landholding. The OP 4.12 further requires particular attention to be given to the needs of vulnerable groups especially those below the poverty line, including:

- landless individuals and households;
- elderly persons;
- women and children;
- persons Living with disabilities
- indigenous groups and ethnic minorities; and
- other disadvantaged persons such as beggars and people living way below the poverty line.

The policy is triggered not only by physical relocation caused by the project but by any loss of land or other assets resulting in:

- relocation or loss of shelter;
- Loss of assets or access to assets; or
- loss of income sources or means of livelihood, whether or not the affected people must move to another location.

The policy applies to all components of a project that result in involuntary resettlement, regardless of the source of financing. It also applies to other activities resulting in involuntary resettlement that in the judgement of the Bank are:

- directly and significantly related to the Bank-assisted project;
- necessary to achieve its objectives as set forth in the project document; and
- carried out, or planned to be carried out, contemporaneously with the project.

Objectives

The objectives of the involuntary resettlement policy are to:

- avoid or minimize involuntary resettlement where feasible, exploring all viable alternative project designs;
- Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient

investment resources to enable the persons displaced by the project to share in project benefits.

- project affected persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs (RAP).
- assist project affected persons to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-subproject level.
- the policy defines the requirement of preparing a resettlement plan or a Resettlement Policy Framework, in order to address the involuntary resettlement.

The key Principles of World Bank Involuntary Resettlement Policy are:

- the need to screen the project early on in the planning stage;
- carry out meaningful consultation;
- at the minimum restore livelihood levels to what PAPs were before the project, improve the livelihoods of affected vulnerable groups;
- prompt compensation at full replacement cost is to be paid;
- ensure that PAPs who have no statutory rights to the land that they are working, are eligible for resettlement assistance and compensation for the loss of and/or assets; and
- disclose all reports.

The policy safeguards against impoverishment risks of involuntary resettlement that may be associated with a development project. It addresses risks that the production systems may be dismantled; people may face impoverishment when their productive assets or income sources are lost; people may be relocated to environments where their productive skills may be less applicable and the competition for resources greater; community institutions and social networks may be weakened; kin groups may be dispersed; and cultural identity, traditional authority, and the potential for mutual help may be diminished or lost.

The OP 4.12 further requires particular attention to be given to the needs of vulnerable groups, especially those below the poverty line including;

- landless individuals and households;
- elderly persons;
- women and children;
- indigenous groups and ethnic minorities and
- other disadvantageous persons.

The World Bank's Policy requires that where OP4.12 is applied, a Resettlement Action Plan (RAP) shall be prepared and cleared by the Bank prior to the implementation of resettlement activities.

It is a requirement of the Bank for adequate provision to be made for compensation and other assistance to Project Affected Persons, to restore livelihoods when these are affected appreciably, and this must be done prior to the displacement of people. In particular, the policy requires that possession of land for project activities may take place only after compensation has been paid. Resettlement sites, new homes and related infrastructure, public services and moving allowances must be provided to the affected persons in accordance with the provisions of the RAP

Comparative analysis of national policies with World Bank Requirements

This RAP is prepared in accordance with the existing national legal and administrative framework on compulsory land acquisition and compensation and that of the World Bank's policy on involuntary resettlement. The laws and regulations as well as requirements for resettlement in Sierra Leone are not fully compatible with that of WB. In the case of any gaps between the national law and WB Policies, the policies that provide highest protection and better mitigates the risks and impacts on project affected people will prevail, This will be captured as an agreement between the WB and the Sierra Leone Government. The key differences between Sierra Leonean legislation and WB OP 4.12 relevant for this road project are as follows:

- persons who have no recognizable claim to the land they occupy are not entitled to compensation, including resettlement to adequate housing and livelihood restoration assistance;
- persons who have no recognizable claim to the land they occupy are not recorded by a census;
- in cases of economic displacement, project affected people, including those with informal income are not entitled to livelihood restoration assistance, however this can be provided in the framework of the WB OP 4.12 policies;
- informal residential and business structures are not subject to compensation;
- national consultations with affected people regarding proposed compensation processes are not required by legislation;
- provision of special support to vulnerable groups is not applicable in the national legislation;
- foreseen by the Expropriation Law, however it can be provided in the framework of other national laws;
- there are no requirements for follow on monitoring and evaluation of the resettlement process and outcomes.

Table 3.3-1 summarises a comparative analysis between the national policies and the WB requirements:

3.2.1.1 Common Principles

Generally, both the donors' and the policy of GoSL support the following basic principles:

- involuntary resettlement shall be avoided or minimized to the extent possible through the incorporation of social consideration into design options and alignment selections.
- where displacement is unavoidable, i.e. people losing assets, livelihood and other resources shall be assisted in improving or at a minimum regaining their former status of living at no cost to themselves.

There are some areas, however, where additional measures or further specifications for the entitlements under national guidelines and laws are necessary to meet the standards of the World Bank (OP 4.12). These additional measures are essential for ensuring that the principles mentioned above will be achieved. In addition, a well thought out, specific entitlement framework would protect the project from major delays caused by confusion. Table 3.3 1 below, presents a comparison of National Legislation and World Bank Requirements for Involuntary Resettlement.

Table 3.2-1: Comparison of National Legislation and WB Requirements for Involuntary Resettlement

Issue	National law	World Bank Policy	Gap	Strategy
Public consultation and information disclosure	The PAPs are contacted in the process of expropriation, but there is no public discussion	Meaningful consultations with affected persons and communities, local authorities, and, as appropriate NGOs needs to be carried out.	Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementation and monitoring of resettlement	Detailed Public Consultation Plan and Communications Strategy will ensure informed participation through life of project, from inception to completion. A feedback system will be ensured during project life. The World Bank laws will prevail.
Compensation	No legal provision; compensation is paid based on monetary terms to replace the lost land and property	Preference should be given to land-based resettlement (land to land) to PAPs whose livelihood is land-based. In some instances, cash compensation are given at full replacement cost in local markets	National Law does not expressly stipulate transparency or consistency as requirement in payments although this is implied in national corruption laws.	Compensation payments will be prompt, transparent and consistent, through compensation policies developed and agreed with stakeholders prior to displacement. National laws will prevail as it is impractical in some circumstances to have land for land compensation.
Encroachers/squatters	People who encroach/squat on the area are not entitled to compensation or any form of resettlement assistance	People who encroach on the area after the cut-off date are not entitled to compensation or any form of resettlement assistance	WB recognizes squatters entitlement to cash compensation for investments made on land before cut-off regardless of legal tenure	All eligible owners of pre-cut-off date assets (buildings, land, crops etc.) will be entitled for compensation and treated equally regardless of legal tenure. World Bank's requirements will apply.
Livelihoods restoration and	No provision	Provide additional targeted assistance (e.g. credit	National Law does not specify assistance, but WB requires	Resettlement assistance in terms of moving allowances, loss of earnings

Issue	National law	World Bank Policy	Gap	Strategy
resettlement assistance		facilities, training or job opportunities) and opportunities to improve or at least restore their income earning capacity, production levels and standards of living to economically displaced persons whose livelihoods or income levels are adversely affected. For a transitional period	targeted assistance in terms of livelihood supports	etc. will form part of compensation package in addition to longer term livelihood development programmes. World Bank requirements will apply.
Support to vulnerable groups	No legal provision; compensation for expropriated property can be determined	According to World Bank policy a special attention must be given to vulnerable groups to be identified in the project area during the social impact assessment. They are entitled to additional compensation, legal assistance during resettlement and help during physical relocation	WB requires focused measures for vulnerable groups	Specific efforts will be made to identify vulnerable, or potentially vulnerable households at time of baseline surveys, for special consideration based on scale of impact. World Bank requirements will apply.
Residential and business renters	Fixed improvements introduced by renters on the land or structures automatically belong	Under OP 4.12 para 16: (i) compensation at full replacement cost for loss of	Compensation for fixed improvement introduced by the renter will be paid to the	Renters will be identified through census and provided with compensation for permanent

Issue	National law	World Bank Policy	Gap	Strategy
	to the landowner, unless there is a specific provision that the owner will compensate the renter for any fixed improvements introduced by the latter. The practice is to ask the landowner to sign a waiver, allowing the renter to be paid compensation for any fixed improvements. There is no law written on this but legal rental agreement usually specify this.	structures/assets other than land; (ii) resettlement assistance; and (iii) other assistance, as may be necessary to fulfill OP 4.12 objectives	renter. Renter will be provided compensation for transfer costs and disturbance compensation for temporary closure of the business establishment while transfer is ongoing	improvement and compensation for temporary loss of income and disturbance allowance as applicable. World Bank requirements will apply.
Grievances	The law prescribes the possibility of appealing throughout expropriation phases with statutory limits	WB policy recognizes that PAPs should be represented and their grievances addressed	WB requires grievance mechanism to be in place in all project impacted locations and at all project level. It does not preclude a PAPs right to state court/judiciary system	Detailed grievance mechanism in place and articulated through Public Consultation and Disclosure Plan, with recourse to court of law if need be. The GRM will be accessible at no cost, reliable and transparent. World Bank requirements will apply.
Monitoring and evaluation	No provision	Requires monitoring and reporting on effectiveness of RAP implementation	WB requires effective monitoring and evaluation of the effectiveness of RAP implementation	Detailed monitoring, evaluation and monitoring programme built into the overall project management process. Monitoring will be

Issue	National law	World Bank Policy	Gap	Strategy
				internally and externally done. World Bank requirements will apply

In a number of cases, as shown in the table above, the World Bank requirements are more favourable and provides better protection to PAPs than the provisions of the Sierra Leonean Laws. Thus, in the event of divergence between the two, the policy which will be considered to be of comparatively higher standard shall apply.

4.0 ADMINISTRATIVE FRAMEWORK

The following institutions would have various roles to play in the implementation of the Resettlement Action Plan for:

4.1 Ministry of Transport and Aviation (MoTA):

This Ministry is mandated to deal with issues related to transport on land, air and sea as well as local and international communications. Transport sector contributes to habitat fragmentation and loss as well as the introduction of pollutants into the environment. The Ministry oversees the Sierra Leone Roads Authority (SLRA), Sierra Leone Road Safety Authority (SLRSA) and the Sierra Leone Road Transport Corporation (SLRTC). There is also recognition that effective project delivery would require collaboration across multiple departments and agencies, including Freetown City Council (FCC), SLRA, SLRSA, and Sierra Leone Police traffic division. To strengthen coordination across multiple agencies, a Steering Committee has been established with members from key agencies responsible to support project preparation.

4.2 Ministry of Works and Public Assets (MoWPA)

The MoWPA is charged with several statutory responsibilities among which are: (i) road construction, supervision, monitoring and maintenance of the main road system through SLRA as well as public buildings; (ii) enhances the improvement of road networks by securing bilateral and multilateral agreements with donors for funding; (iii) provision of engineering infrastructure to roads (iv) Construction and maintenance activities can lead to habitat fragmentation and pollution problems and (v) to use the resources, both human and material available to the MoWPA to make roads the best and safest means of transport all the time.

4.3 Ministry of Lands, Housing and the Environment

The MLHE would be responsible for managing and protecting the environment as well as land valuation and compensation related to this project. The ministry provides advisory services to the public on land matters and is also responsible for physical planning and management of the forestry resources. The Town and Country Planning Department is responsible among others for planning, controlling and ensuring the harmonious, sustainable and cost-effective development of human settlements in accordance with sound environmental and planning principles.

The Surveys and Lands Department: This Department is responsible for the management of public and vested lands transactions and they, in co-ordination with the relevant public agencies and governmental bodies, perform other functions related to involuntary resettlement.

The Land Valuation Committees of District Councils aim at delivering an open, timely and cost-effective valuation service, with the view to supporting economic development.

The Lands Title Registry aims at providing an open, cost effective and timely service in the registration of titles and interests in land that is state-guaranteed to meet the needs and expectations of the country and its inhabitants.

4.4 Ministry of Finance (MOF):

This ministry has the broad responsibility for financial management, procurement, and monitoring and evaluation functions of the project.

4.5 Ministry of Local Government and Rural Development (MLGRD)

Local Government in Sierra Leone is a sub-national structure to which some functions have been delegated to it from the Central Government to plan, administer and manage with accompanying resources. The Freetown City Council operates through a local council which is the highest political body in the Freetown. The elected council constitutes representative body with delegated powers and funds for local governance.

4.6 The Environment Protection Agency

Environment Protection Agency (EPA) is a statutory agency for the protection of the environment and for other related matters. With reference to the road project, the EPA has the overall responsibility of approving and monitoring the project's compliance in line with the Approval Conditions as well as other standards relating to environment. It is further empowered to identify projects, plans and policies for which environmental assessment are necessary and ensure that the same is done in line with the provisions of EIA regulations. Its responsibilities include managing the EIA process, making decisions and ensuring that management occurs in accordance with the decision. As such, EPA approves the terms of reference for project assessments, reviews reports including the project brief, EIA and follow-up, monitoring reports. The Agency also helps the project proponent to establish a public consultation process.

EPA requires that any RAP related activities especially physical displacement of PAPs be included and clearly captured in the Scoping Report and as part of the ESMP.

4.7 Sierra Leone Roads Authority

Sierra Leone Roads Authority is a semi- autonomous government entity responsible for the administrative control, planning, development and maintenance of all national road network and related structures including bridges, street furniture, and government-owned ferries. It is also responsible for traffic management, including provision of traffic signals, road signs and markings; road layout and junction design, as well as the condition of the roads but in practice has limited internal capability in this area. With regard to the environmental and social aspects of this road project, SLRA's Environmental Division will take the responsibility of monitoring compliance during implementation and operational stages of the road project.

4.8 Sierra Leone Ports Authority

The SLPA is responsible for the jetties used for water transport services and private vessels.

4.9 Sierra Leone Road Safety Authority

The SLRSA reports to the MoTA through its board of directors, the SLRSA is responsible for testing and licensing all vehicles and drivers in Sierra Leone; road safety and employs traffic wardens to assist the traffic police in controlling traffic and enforcing traffic and parking regulations; planning of public transport routes in Freetown. Under the current legislation, the Sierra Leone Road Safety Authority is responsible for designating public transport routes as well as set fare levels.

Section 35 of the Road Traffic Regulations 2011 places the responsibility on the SLRSA to license all public transport in Sierra Leone. The Authority is also responsible under section 41 of the same Statutory Instrument (SI) to designate the various routes allocated to operators as well as the amount they should charge for the various stages along the routes.

4.10 Sierra Leone Road Transport Corporation

The Sierra Leone Road Transport Corporation is the state corporation established by an Act of Parliament in 1964 with responsibility for providing public passenger transport services in Sierra Leone. SLRTC will be instrumental in monitoring behavioural road safety aspects during the implementation and operation of the road in line with its mandate. The SLRTC has powers to provide and regulate passenger transport services throughout the country.

4.11 Freetown City Council

Freetown City Council is the highest political authority in the City of Freetown, with legislative and executive powers. It is responsible for promoting the development of the city and the welfare of the people with resources at its disposal (Local Government Act, 2004). It has a major stake in all development programs and the collection of licenses and taxes within the city. Other responsibilities include:

- mobilisation of human and material resources necessary for the overall development of the city and the people living there;
- promoting and supporting productive activity and social development;
- initiating and maintaining programs for the development of basic infrastructure and provides works and services;
- initiating , drawing up and executing development plans for the city;
- determining tax rates, approving annual budgets and overseeing the implementation of such a budget; and
- the formation of committees

FCC does not have the mandate for urban transport. The Local Government Act 2004 empowers local councils to provide Public Transport Parks (commercial vehicle parks), to designate parking areas and to charge for parking; control street traders. The local councils are also responsible for controlling street traders. Responsibility for urban road maintenance (apart from main roads) should have been devolved from SLRA to local government, but it is understood that this has not been fully implemented. Street lighting should be provided by the Electricity Distribution and Supply Authority (EDSA), under the Ministry of Energy. Local councils have no responsibility for traffic management, other than parking control. There is no formal position within the FCC dealing with public transport.

RAP implementation specific tasks could include:

- verifying asset valuations;
- support in providing alternative land for affected businesses that will be demolished;
- support the demolition of affected structures;
- provide guidance on livelihood restoration for urban enterprises;
- public relations support; and
- managing Councilors.

4.12 Sierra Leone Police (SLP)

Police traffic functions include controlling operations and enforcing regulations; the police undertake some traffic planning functions, such as design and implementation of one-way traffic systems. In addition, they collect transport accident and fatality data.

4.13 Sierra Leone Maritime Administration

The SLMA operates and governs the registry of vessels in accordance with the Sierra Leone Merchant Shipping to ensure safety of life at sea and protection of the marine environment.

4.14 Transport Owners Association and Drivers' Union

The Union represents the interests of their members and play a role, in liaison with relevant government agencies, in allocating operators to routes, and control of the informal transport sector generally. Informal transport terminals are managed by representatives of the drivers' unions. The principal unions are: Indigenous Transport Owners' Association Motor Drivers' Union; Bike Riders Union.

The transport associations and unions are an important component of the road transport industry in Sierra Leone. As well as their traditional functions of protecting and improving the working conditions of their members, they principally control the informal transport services and discipline operators and their employees. However, their objectives are determined by the interests of their members rather than those of the general public.

4.15 Sierra Leone Traders Union

The SleTU represents the members of country’s main five traders unions. Its key function is to address the general welfare of its members. It has the power to revoke permits issued by the city council. There are several unions that represent the owners and drivers of commercial passenger and freight transport vehicles in Sierra Leone. The principal unions are: Motor Drivers’ Union and Bike Riders’ Union.

There however appears to be no clear-cut institutional framework for the urban transport sector in Sierra Leone. There are several agencies with responsibilities for various aspects of urban transport with conflicting objectives and varying capabilities. It is therefore planned to establish an autonomous Urban Transport Authority which would take responsibility for all aspects of planning and regulating urban transport in the Greater Freetown area. The Authority would be headed by a panel of representatives of all local authorities and councils within the Greater Freetown area, relevant government agencies, police, and transport operators’ organisations and consumer groups, as well as relevant stakeholder organisations.

For this project two committees have been set up-a Steering Committee and a Technical Support Group/PIU. The composition of each is indicated in the following figure 4.15-1.

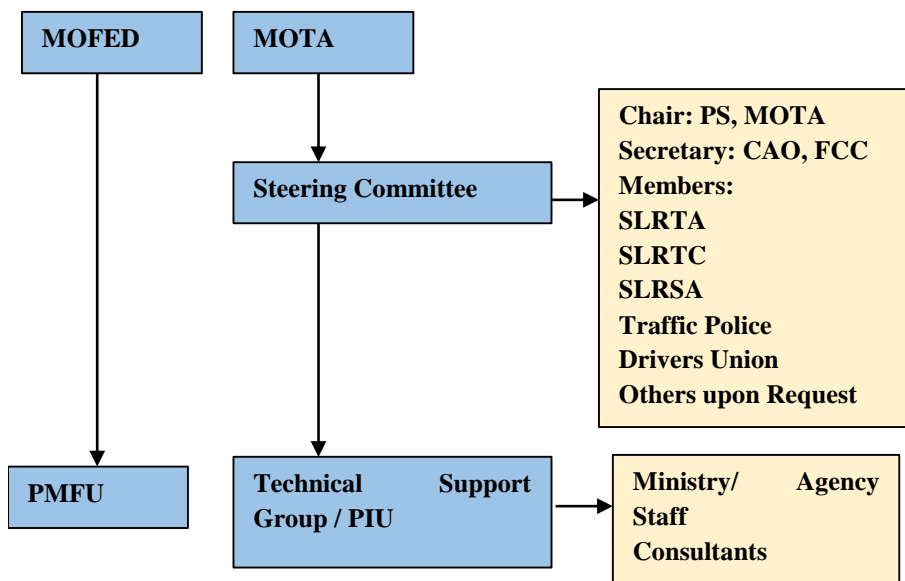


Figure 4.15-1: Composition of Project Committees

The project implementing agency will be the Transport Infrastructure Development Unit (TIDU) of the Ministry of Transport and Aviation. There is also a recognition that effective project delivery would require collaboration across multiple departments and agencies, including FCC, SLRA, SLRSA, SLRTC, and Sierra Leone Police traffic division. The role of the PIU would ultimately need to be expanded. Although the PIU currently has the capacity in safeguard management, a greater amount of effort should be allocated to this area.

The Steering Committee has been established with members from key agencies responsible to support project preparation will help strengthen coordination amongst multiple agencies. The technical support group supports the Steering Committee with project preparation. The Technical support group aims to build capacity within the government, by integrating government staff from MoTA or other relevant stakeholders with consultants. The Project Fiduciary Management Unit (PFMU) is anchored in the Ministry of Finance and Economic Development.

The Resettlement Working Group (RWG) set up will be the primary mechanism for engaging resettlement-affected households and other relevant stakeholders in resettlement planning. The Resettlement Working Group has been formed to plan and co-ordinate resettlement activities. The RWG includes representatives of resettlement-affected households, local authorities (statutory and customary), the project RAP consultant and the Project Implementation Unit. Ultimately all bodies related to resettlement including the RWG will be answerable to the Steering committee.

The roles of the key institutions in the RAP and comments on their capacities are provided in the table below.

Table 4.15-1: Roles of Key Institutions in the RAP Process

Institution	Key role in RAP	Comments on institutional capacity to carry out mandate
Ministry of Transport and Aviation (MoTA)	Help to strengthen coordination across multiple agencies on RAP issues through a Steering Committee with members from key agencies.	High administrative capacity but technical capacity limitations. Could call upon competent personnel from other MDAs and consultancies.
Ministry of Works and Public Assets (MoWPA)	In charge of several statutory responsibilities among which are: (i) road construction, supervision, monitoring and maintenance through of the main road system through SLRA. Main government Ministry in charge of roads.	Capacity is mainly administrative and depends on technical capacity of SLRA which needs to be beefed up by funding.
Ministry of Lands, Housing and the Environment	Responsible for lands transactions. Land acquisition for new land for project and land for resettlement should be done through Ministry.	Most government land not properly codified and technical capacity of Ministry limited. Ministry finds it difficult to manage the indiscipline in the land market but should be in a position for this project to assist with land acquisition of a limited areal extent.

Institution	Key role in RAP	Comments on institutional capacity to carry out mandate
Ministry of Finance (MOF):	This ministry has the broad responsibility for financial management, procurement, and monitoring and evaluation functions of the project. All requests for RAP funds to be provided by the GoSL should be done through this Ministry.	No particular capacity limitations. But funds approved could depend on government budget in the face of competing socio-economic projects.
Ministry of Local Government and Rural Development (MLGRD)/ Freetown City Council	The Freetown City Council is part of the local governance structure and is the highest political body in the Freetown. The FCC is in charge of licensing and operation of traders and markets and will manage several operations at the new resettlement site,	The FCC has capacity and licence and control the operation of traders. However, severe demands will be made of its limited technical capacity to manage technical aspects of the operation of the new resettlement site including waste disposal. It will also have to depend to a considerable extent on the cooperation with other MDAs.
The Environment Protection Agency	As such, EPA approves EIAs follows up on environmental monitoring reports. EPA requires that any RAP related activities especially physical displacement of PAPs be included and clearly captured in its required ESMP report. The project obtains its EIA license from EPA.	Capacity considered adequate for tasks related to RAP.
Sierra Leone Roads Authority	Responsible for traffic management, including provision of traffic signals, road signs and markings; road layout and junction design, as well as the condition of the roads.	Limited internal capability in monitoring compliance during implementation and operational stages of the road project. Capacity limitation is mainly funding related. Capacity however considered adequate for this project if given financial support.

Institution	Key role in RAP	Comments on institutional capacity to carry out mandate
Sierra Leone Ports Authority	The SLPA is responsible for the jetties used for water transport services and private vessels and would need to be consulted for any work at the jetties for this project	Technical capacity adequate for monitoring the implementation of this project
Sierra Leone Road Safety Authority	In charge of controlling traffic and enforcing traffic and parking regulations; planning of public transport routes in Freetown. They should be consulted on these aspects of this project.	Capacity adequate for this project.
Sierra Leone Road Transport Corporation	Responsibility for providing public passenger transport services in Sierra Leone. . SLRTC buses will use the routes and facilities provided at the new car park.	Capacity adequate for this project.
Sierra Leone Police (SLP)	Police traffic functions include controlling operations and enforcing regulations; the police undertake some traffic planning functions, such as design and implementation of one-way traffic systems. In addition, they collect transport accident and fatality data.	Capacity adequate for monitoring duties but limited in terms of collecting and keeping statistics
Sierra Leone Maritime Administration	The SLMA is in charge of safety of life at sea. Although its involvement in this project will be minimal, it needs to be consulted on safety aspects of the sea vessels using the jetties.	Capacity for monitoring vessels inadequate.
Transport Owners Association and Drivers' Union	The Union represents the interests of their members and play a role, in liaison with relevant government agencies, in allocating operators to routes, and control of the informal transport sector generally. Informal transport terminals are managed by representatives of the drivers' unions.	Well organised and capable of seeking its interest.

Institution	Key role in RAP	Comments on institutional capacity to carry out mandate
	They should be consulted at the planning and operational phases of this project.	
Sierra Leone Traders Union	<p>The SleTU represents the members of country's main five traders unions. Its key function is to address the general welfare of its members.</p> <p>They should be consulted at the planning and operational phases of this project.</p>	Well organised and capable of seeking its interest

5. METHODOLOGY

The following methodology was adopted for the RAP:

5.0 Project Impacts and Affected Households

- A detailed large-scale map of the project area was prepared and individual affected owners of structures identified;
- Land surveys were undertaken and different types of land mapped according to use;
- A preliminary census was undertaken of houses and people in the project area; and
- Interviews were conducted with various PAPs to elicit socio-economic information.

5.1 Legal and Policy Framework

The legal and regulatory framework was reviewed, to ensure that legal requirements will be complied with and best practice measures identified. This included, but was not limited to:

- Sierra Leone legislation relevant to resettlement planning and associated activities; and
- International best practice guidelines.

5.2 Planning Information Assessment

Having identified policy and legal framework applicable to the project and reviewed applicable resettlement guidelines all categories of impacts associated with the project from census and socio-economic surveys were identified.

5.3 Establishment of Institutional and Communication Structures

Meetings were held with stakeholders regarding the setting up of a Resettlement Working Group (RWG). The Terms of Reference (TOR) for the RWG was adopted. Preliminary discussions were held with stakeholders about the compensation framework. The RWG has met on several occasions. The consultant coordinated the consultation and participation process with affected persons, host communities, and local government and related authorities on different occasions.

A resettlement paper was prepared outlining the resettlement process and what it entails. This was posted at various appropriate places in the communities affected. A community engagement plan (appendix 4) was also prepared which recognizes the role of the RWG. Records were kept of Focus Group meetings.

5.4 Land Acquisition

An outline of the scope of land acquisition for the project was prepared. Alternatives were considered for the location of various facilities. Relevant consultations were held with various Ministries, Departments and Agencies (MDAs) responsible for land acquisition and development. This was undertaken with recourse to a review of the laws, regulations and guidelines that apply to land acquisition. Mechanisms were established to minimise resettlement, to the extent possible.

Government land in several areas very distant from the current project site was considered. It was however resolved that for project implementation to the satisfaction of PAPs the land for implementation of the project should be at or in proximity to the project site. After careful consideration, it was agreed that the land housing the current car wash site and the adjacent swamp land would be the best locations for implementing various aspects of the project. The PAPs consulted preferred relocating to the site chosen close to their current location as other areas that could have been considered were too distant. The questions answered during the social surveys clearly showed that proximity to the current site in order to continue their businesses was important to the traders. For house owners that needed to relocate, the government is considering land owned by government on other areas but with the current problems faced by government in retrieving government land, this has proved a difficult and uncertain exercise in the meantime. A firm compensation package has however been recommended.

5.5 Households and Structures

Building on the information system already in place, all affected assets were surveyed, mapped and recorded. The following information was collected:

- total number of buildings and size of each;
- the total area of the residential site ("footprint"); and
- all secondary structures owned by the homestead owner.

Field sketches indicating household buildings and any other secondary structures for affected households were prepared.

5.6 Organisational Responsibilities for Implementation and Budgets

In consultation with the client and the RWG, the organisational responsibilities for resettlement implementation were discussed. A matrix detailing tasks, responsibilities and complementary planning actions was prepared as a tool for managing and coordinating all resettlement-related activities.

5.7 Compensation Framework

The following activities were undertaken in relation to the compensation framework:

- determine eligibility for compensation and other resettlement assistance;
- determined project-specific "cut-off dates" for defining the eligibility of those lacking legal land title is an issue, in order to discourage entry into the area by opportunistic people seeking to establish claims for assistance;
- provided details of the Eligibility Policy for all categories of loss, including compensation rates;
- prepared a Compensation matrix; and
- prepared packages of compensation and other resettlement measures that will assist each category of eligible displaced persons to achieve the objectives of the client.

5.8 Dispute Resolution and Grievance Redress Mechanisms

A grievance redress framework was developed that has been put in place by the project proponent setting out the time frame and mechanisms for resolution of complaints about resettlement.

5.9 Livelihood Restoration and Development

Works related to livelihood restoration and development has included:

- analysing economic activities (sources of income) of all affected persons (by gender, age group, education, skills, income, household size, preference, options) to assess their needs to establish baseline;
- analysing and surveying existing economic conditions and identifying potential income restoration measures;
- determining if compensation alone is sufficient to restore income for some categories of impacts;
- fitting the identified needs and aspirations of affected persons in each category of impact to existing and potential economic opportunities;
- developing income restoration strategies for each category of impact, including an analysis of the technical, financial, economic and institutional feasibility of the proposed strategies;
- confirming the availability of all physical and financial resources necessary to implement the income restoration strategies for each category of impact;
- developing a framework for institutional supervision and evaluation.

A sustainable, well thought and practical livelihood development programme based on the needs of the people and existing economic conditions has been incorporated into the project.

5.10 Monitoring and Evaluation Process

The following were done in relation to the monitoring and evaluation process:

- planned the internal monitoring process;;
- prepared database on affected persons to ensure efficient monitoring and evaluation of resettlement;
- identified capable institutions for external monitoring;
- determined the methodology for external monitoring;
- identified key monitoring indicators for internal and external monitoring;
- identified process for integrating feedback from internal and external monitoring into implementation.

An internal monitoring programme was prepared including a list of identified external institutions.

5.11 Social Impacts on the Host Community

Activities undertaken included:

- carrying out a desktop socio-economic assessment of host communities to determine potential resettlement impacts;
- consulting with host communities on resettlement plans and site selections- Focus Group Meetings and Key Informant Interviews; and
- planning for sharing infrastructure and community facilities.

The general aim of the social impact assessment is to answer the following questions:

1. What is the context (socio-economic) of the site?
2. What are the potential impacts of relocation on host communities, services, road traffic, safety, etc
3. Who are the main stakeholders?
4. Has there been sufficient consultation with host communities?
5. What are the main concerns and how will they be addressed in the RAP?

6. DESCRIPTION OF THE PROJECT AFFECTED AREAS

This section describes the project affected areas, that includes Lumley/Aberdeen axis and Congo cross/ Ferry junction intersections.

6.1 Lumley/Aberdeen axis

General

Most of the traders selling merchandise on the streets and those selling mainly food items in the perishable markets are petty traders whose main objective of selling is to sustain their families. People selling their wares on the street are more exposed to accident risks. During the rains the hawkers have the fear of getting wet and they experience a big drop in their sales. Most of the hawkers come from other parts of the city for for example Abacha Street, Kissy, Dove Court and the like, to sell their wares at the Lumley market area. Near the Lumley roundabout on this road, there are big shops and traders selling their wares in front of these shops.

A few hundred yards on the right of the road towards Lumley beach is a big area called “car wash” where a lot of activities take place including commercial washing of cars and several types of businesses. Some people also use this site for habitation. The site is a reclaimed land of a total area of about 21,036.89 square meters Part of the site includes a large marshy area. There is an open roadside drain along the proposed access road and an earth channel along the opposite side of the site with a footbridge as pedestrian crossing. Presently, the site is occupied with a few concrete buildings (dwelling houses and shops), shipping containers, car washing bay. A number of economic activities are carried out in the car wash area including welding, vehicle repair/maintenance, petty sales of all types of local food items, car washing and a terminal for “poda-podas”, “okadas”, tricycles (“Kekeh”), taxis and several other vehicle types of both commercial and private types. The car wash boys organise themselves into groups working on a shift basis washing cars. A major feature at the carwash site also is that there are people using the stalls for habitation purposes. Figure 6.1.2 below shows overview of Lumley Roundabout, Regeant Road and Juba Road and Figure 6.1.3 shows the layout for the proposed market and bust Terminal.



Figure 6.1-1: Aerial View showing Lumley Roundabout, Regent Road and Juba Road Source: MoTA**Figure 6.1-2: Layout for Proposed Market and Bus Terminal Source:**

Drainage issues

The project area is drained by a seasonal stream which originates from the peninsula mountain. This stream empties into the Atlantic Ocean through a floodplain and tidal flats. The drainage system around the project site is not properly constructed and there is frequent flooding exacerbated by scattered structures which obstruct the free flow of excess water. There is no defined drainage at the existing market site except the drainages along the Lumley Juba main road. The market area close to Lumley Bridge is not suitable for the building of any structure as originally envisaged due to its exposure to natural flooding events, potential increase in pollution of the Juba stream and the safety concerns due to proximity to the proposed road expansion works. Also, the site is exposed to flooding, and a sizable portion of it is used as an active solid waste dump site. Seepage from the site could pollute the Lumley creek downstream in the event of severe rainfall.

Water supply

There are taps in the Lumley and car wash area. The design team will definitely make provision for water in the new facilities. The supply of water to the proposed car park project site and the existing Lumley market is mainly from Guma Valley Water Company. The proposed car park has a 10,000 litre water storage tank which is regularly filled by Guma Valley Water Company which is used mainly for car wash activities. There are also a few bore holes around the project area which are used during periods of water shortage.

Drinking water sources are mainly from sachet water and Guma Valley stand pipes within the premises of the residents around the project site. The Lumley market also has 10,000 litres water storage tank which is used mainly in the sanitary facility and for domestic activities.

Surface and groundwater

The surface water is impacted more than the groundwater as it is more exposed to the activities within and around the project site. Surface water within project site flow is impacted by random construction of temporary and permanent structures and deposition of domestic waste. The groundwater is likely to be impacted by oil spillages in the area where vehicles are been repaired.

Sewage disposal and sanitation

The car park and the existing Lumley market have sanitary facilities which need to be improved. The existing market sewage disposal and sanitation is managed by Freetown city council while that of the car park is managed by designated individual. Poor sanitation issues identified at car park involves defecation in landfill and nearby stream which serve as drainage channel to the sea, open urination and unsanitary solid wastes disposal practices were identified at the project site. Poor housekeeping and unsanitary storage of solid waste practices are major sanitation problem identified at the market in the Lumley market. Poor hygiene practices at the market are major public health concerns to be addressed.

Waste disposal

Solid wastes generated at the car park project site are collected in waste bins and dumped at the landfill within the project area or the nearby stream. Liquid waste like used oils from the garages are normally dumped into the stream and the nearby landfill. The landfill also serves as a defecation ground for some people. Solid waste generated at the existing market are assembled on the street on daily basis and later collected by Freetown city council trucks.

Soils and land use

The soils are generally sandy clay loam to clay loam with high silt content in floodplains areas. These soils are well to imperfectly drained. The land use generally is for petty trading, agriculture and car washing. The project site is underlain by Precambrian ultrabasic rocks.

Flora and fauna

Along the coast of the project boundary at the car wash site are a few trees of mangrove vegetation. These mangroves are much degraded and in some areas completely depleted. Other species such as the mango tree is quite common in the area, serving a similar ecological function but in addition, provides food for people in the vicinity. In general, the present type of vegetation has been as a result of a long period of modification from human activities. The area has patches of derived grassland, together with shrubs and trees of various stages of growth. The boundary is also covered with bush regrowth mix with fruit trees and cotton tree. The car wash area does not provide a conducive habitat for fauna to thrive. The human activities are the most influential factors that contribute to the deterioration of the ecological system/aquatic life in the area. The trees house the common fruit bat and many smaller fauna, such as butterflies, ants and other invertebrates.

6.2 Access options to terminal

Using the existing roads to access the new market site/ terminal will result in clogging up of the roads and defeat the purpose of the project. Alternative routes are planned. The access route veers off the main road from Congo cross and meanders through another road to the terminal. There are however some small houses and makeshift garages along this route that would need to be demolished. An egress road is planned out of the terminal on to the main beach road. Another lane is planned for this egress road which will also involve demolishing some properties-mainly fences. These access options are shown in Figure 6.2-1.



Figure 6.2-1: Access options for terminal. Source: CEMMATS

6.3 Congo cross/ Ferry junction intersections

Vehicular traffic congestion is usually experienced around the Congo Cross intersection within peak hours in the morning and evening. The existing overall traffic flow at the roundabout is unbalanced with most of vehicles on Main Motor Road and Wilkinson Road to or from the Central Business District (CBD).

The cross road intersection at Ferry Junction is presently an uncontrolled traffic system with conflict between vehicles and pedestrians. However, due the relative balanced nature of the design the traffic flow there are little delays at this intersection. The intersection offers no street lighting, the issue of highway safety for pedestrians during the hours of darkness becomes more prevalent. The efficient operation of the intersection is further compounded by poda-poda and Okada / tricycle drivers parking their vehicles immediately after the intersection to allow passengers to board and alight.

The intersection at Congo cross generates a reasonable amount of surrounding activity which is generated by the adjoining land-uses.

Observations confirmed the adjoining land uses comprising of a sizeable taxi park, police station, restaurants / bars, local retail, plus a girls' school. As a result, the pedestrian footfall observed around the intersection is quite uniform but a definitive peak is noticeable and associated with the arrival and departures of pupils to/from the school. Whilst no pedestrian personal injury accident data is available the lack of formal and safe pedestrian crossing points around the intersection is an issue that justifies further observation. Figure 6.1.3 below shows the areal view of the Congo Cross Roundabout and Figure 6.1.4 shows areal view of Kissy Fairy Junction Intersection.



Figure 6.3-1: Aerial View of Congo Cross Roundabout. Source: : CEMMAT



Figure 6.3-2: Aerial View of Kissy Ferry Junction Intersection. Source: MoTA

The site for relocating the taxi park at Congo cross has already been described. It is within 100 m of the current taxi park. There is ample space at the “Peace Market” near Ferry junction for resettling the affected traders at Ferry junction. This has also been described.

7. CENSUS AND SOCIO-ECONOMIC SURVEYS

This chapter discusses the census and inventory of assets, and the socio-economic characteristics of the affected households.

7.1 Introduction

Census and inventory of assets

A census and inventory of assets survey was undertaken. The aim of the survey was to compile a baseline of all assets, infrastructure, livelihood resources and other socio-economic activities that may be displaced by the project. This inventory forms the important basis of all subsequent project planning, since it identifies affected persons and the quantum of assets to be compensated for or replaced. The survey was of households and structures and also included pertinent questions on livelihood restoration and development.

The study covered a detailed survey of all losses that would be incurred by the PAPs. The survey accounted for loss of temporary physical assets as well as temporary loss of income. Assets were delineated accordingly whether privately owned or public. This was done in close consultation with PAPS. Physical inspection of assets involved physical inspection, identification of materials used; especially for the floors, walls, and roofing. Different types of structures were identified and documented. A list of all movable and stationary assets whether privately owned or rented was taken for each trader and a detailed description of the assets was done. Through the data collection tool; ownership of each structure was determined.

Socio-economic survey

A survey was undertaken of a variety of stakeholders at all the project sites. In particular, the survey provided a baseline of socio-economic conditions of PAPS in the area before the project is implemented. This will serve as a benchmark for follow-up surveys, to be undertaken sometime after the project is complete, to monitor whether participants in the project area have experienced any changes in the living conditions or quality of life. The survey was undertaken through a questionnaire. The survey analyses economic activities (sources of income) of all affected persons (by gender, age group, education, skills, income, household size, preference, options) to assess their needs to establish baseline

7.2 Methodology

The PAPs were fully engaged on the data collection process before the commencement of the census and survey. In addition to this, letters were sent to various community stakeholders, informing them about the census process and commencement date and the notice of the resettlement and census schedule displayed at strategic locations at all project sites. At the start of the census and survey, megaphones were also used to inform PAPs about the census and survey.

Enumerators (fifteen) were recruited for the data collection. A two days' training session (including piloting questionnaire) was held at the CEMMATS Library between 18th – 19th

September, 2018. Data collection of the survey and census commenced between 20th – 24th September, 2018 (weekend inclusive).

Data related to census, assets inventory and socio-economic surveys of PAPs were captured primarily using two approaches (1) administering of semi structured questionnaires and (2) physical counting and assessment of structural assets. Photos of PAPs with unique individual codes assigned to every individual PAP were taken to ensure proper identification. Every PAP's unique photo code was filled in the questionnaire of the PAP to ensure correct photos match PAP's socio economic and assets details.



Figure 7.2-1: PAP with ID card with Unique Code and Phone Contact

All questionnaires were designed into electronic platform and data captured using mobile tabs. Every PAP interviewed was geo-referenced. This was done to enhance robust on-site monitoring of the data collection process. Every filled questionnaire was cross-checked with the entered data to verify that all details were captured correctly. All physical structures and assets likely to be affected were coded before commencement of the socio economic survey.

Analysis of the data collected in the census, assets inventory and socioeconomic studies was done by the use of qualitative and quantitative statistical methods (using SPSS and excel) and the results thereof served to: provide information needed to establish an appropriate entitlement matrix; generate basic economic and social information needed to design appropriate livelihood restoration and development interventions; and provide quantifiable demographic, economic, educational, occupational and health indicators and vulnerability context of the proposed project for future monitoring and evaluation of RAP implementation.



Figure 7.2-2: CEMMATS R/Assistant Administering Mobile Tab-Based Questionnaire to PAP at Lumley Market

7.3 Analysis of results of socio economic surveys and census

The analysis of RAP data comprises three separate locations: Car Wash park, existing Lumley market and proposed route options to the proposed terminal and market. Two sets of censuses were done considering (1) households residing within RAP project boundary/proposed project locations and (2) businesses at existing Lumley market, Car wash park and proposed routes – business census and household census of PAPs that require resettlement actions.

The following sections with tables and charts presents the analyses done and the findings for the: households at proposed routes and existing Lumley market and businesses at the same locations.

A separate section (7.3.3) is devoted to the Congo cross and Ferry junction intersections

Households Survey and Census

Average household size of households within the three survey areas is 4.0.

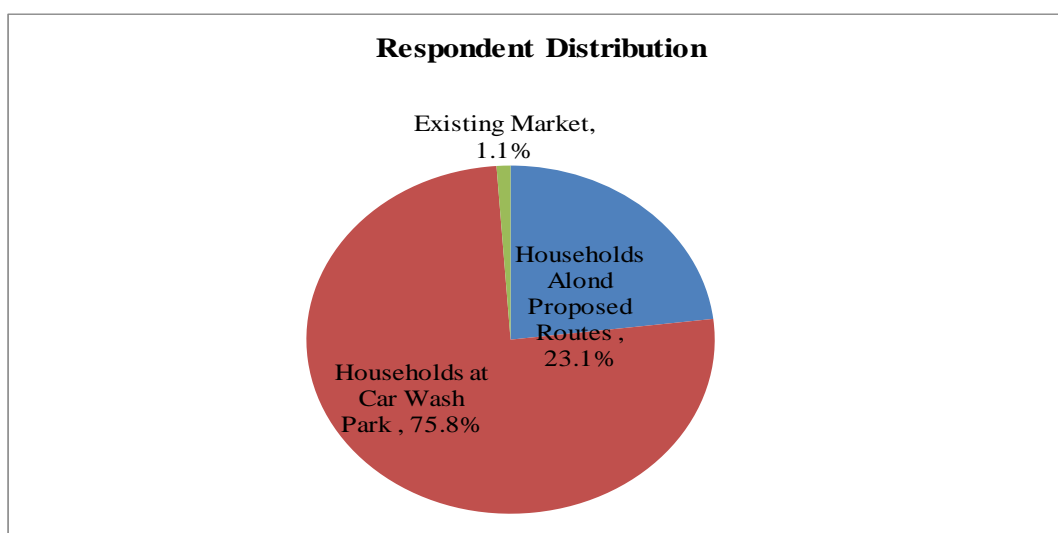


Figure 7.3-1: Distribution of Households/PAPs in Project Areas

Ninety one (91) households were enumerated in the entire census and 91 questionnaires administered to them at the same time. Of the 91 households enumerated, 21 (23.1% of total enumeration) were households along proposed routes, 69 (75.8% of total enumeration) at the car wash park and 1 (1.1% of total enumeration) at the existing market.

Gender Distribution of Household Heads and Household members

Out of the 21 households along the proposed routes, 61.9% are male headed whilst the rest are female headed. 78.3% of households at the car wash park are male headed and the only household at the existing market is male headed. Table 7.3-1 presents the Gender of Household Heads.

Table 7.3-1: Gender of Household Heads

Project Locations/Sites	Male (%)	Female (%)	N-Values
Households along proposed routes	61.9	38.1	21
Households at car wash park	78.3	21.7	69
Existing market	100.0	0.0	1

Source: CEMMATS/IRUMP RAP Census and Socio-Economic Survey, 2018

Analysis of all persons (household members) reveals that, at the car wash park, there are more males than females. This shift in proportion is also evidenced with households along the proposed routes. Table 7.3-2 present the gender distribution of Household Members.

Table 7.3-2: Gender Distribution of Household Members

Gender Distribution of Household Members			
Survey Area	Male (%)	Female (%)	N-Values
Households along proposed routes	66.7	33.3	105
Car wash park	64.7	35.3	187
Lumley market	100.0	0.0	3

Source: CEMMATS/IRUMP RAP Census and Socio-Economic Survey, 2018

Marital Status

For households along the proposed routes, 52.4% of household heads are married to at least one spouse, 4.8% are widowed and 42.9% have never been married. From the car wash park, data reveals that 65.2% of household heads are married to at least one spouse, 21.7% have never been married and 10.1% are living in a consensual union. Table 7.3-3 presents the marital status.

Table 7.3-3: Marital Status

Marital Status	Proposed Routes (%)	Car wash Park (%)	Existing Market (%)
Monogamous	47.6	60.9	0.0
Polygamous	4.8	4.3	0.0
Widowed	4.8	0.0	0.0
Never married	42.9	21.7	100.0
Consensual union	0.0	10.1	0.0
Divorced	0.0	2.9	0.0

Source: CEMMATS/IRUMP Census and Socio-Economic Survey, 2018

Education

As indicated in Figure 7.3-2, 33.3% of persons enumerated along the proposed routes have attained some formal secondary education but not completed, 21.9% have attained or are at post secondary level education whilst 3.8% have never been to school. At the car wash, the survey showed that majority of (49.2%) of household members have only attained or are doing some form of secondary education but have not completed, 25.1% have never been to school and only 1.1% have attained or are at post secondary education. 33.4% of household members

residing at the existing market have never been to school, 33.3% have only attained or are doing some form of primary education and 33.3% have either attained some form of secondary education or are doing some form of secondary. Results show that a greater proportion (70.1%) of persons are illiterate with a higher of these at the car wash park.

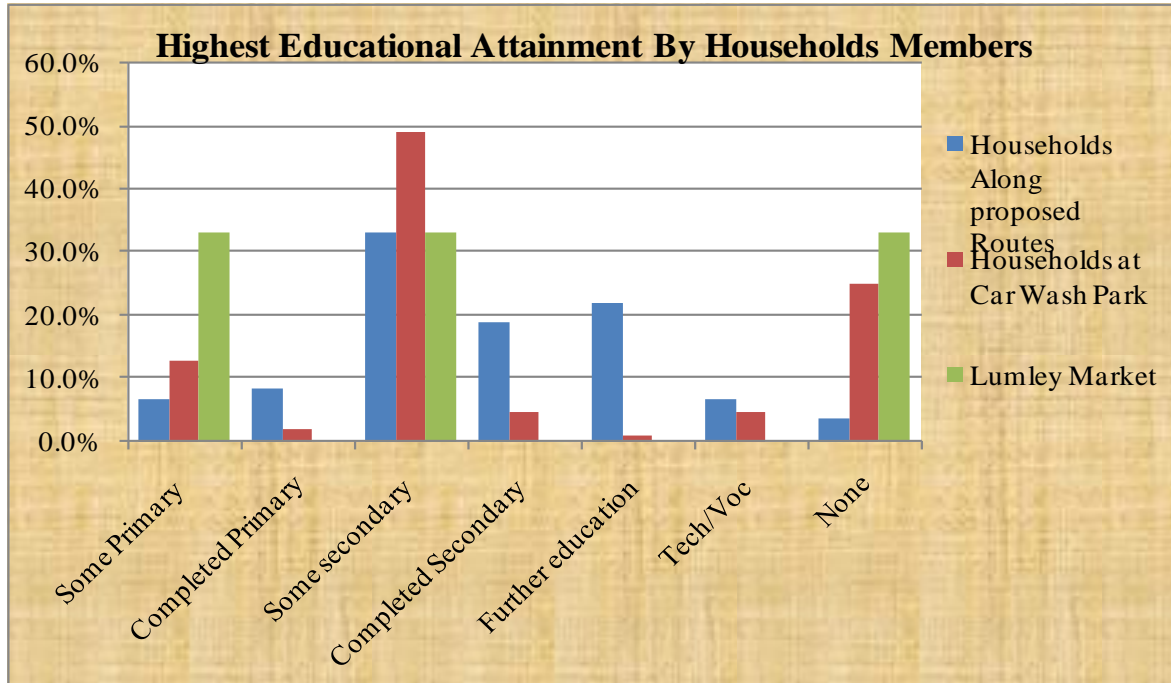


Figure 7.3-2: Educational Attainment by Household Members

Women and Vulnerability Context

Female headed households and women with low income levels and other vulnerable groups are considered special groups with special interest. This is because they might not have much resilience to cope with economic and social shocks as compared to other groups that are not considered vulnerable. As indicated in the following table, 2 children living with disability were reported to reside in the car wash park whilst 1 is reported to be residing along one of the proposed routes, 6 adults living with disability were reported to be at the Car wash Park, 6 households along proposed routes were reported to be headed by under-aged persons (<18years) persons. 4 child headed households were reported to be residing at the Car wash park. Of the 33.3% of the females residing along the proposed routes, 4.8% are widowed whilst 19.0% have never been married before. 23.2% of the 35.3% of females at the car wash have never married before. This depicts some high vulnerability index in both study areas. Table 7.3-4 presents the vulnerability context of the project zone.

Table 7.3-4: Vulnerability Context

Assessment Areas	Disabled Child (frequency)	Disabled Adult (frequency)	Child Headed Household (frequency)
Proposed routes permanent structures	0	1	6
Car wash area	2	6	4
Existing market	1	0	0

Source: CEMMATS/IRUMP RAP Census and Socio-Economic Survey, 2018

Access to Potable Water and Energy

Households' access to potable water is among other key indicators in determining the quality of life that household lives. The primary sources of potable/drinking water varies among households and locations. More than half (57.1%) of the households residing along the proposed routes get their drinking water primarily from pipe borne water or protected water wells (communal or private at home), whilst 42.9% buy drinking for their households from private vendors (sachet/plastic water). 60.9% of the households at the car wash park use water from a communal pipe borne water source whilst 30.4% of households from the same proposed project site buy water for drinking purposes from private vendors (sachet/plastic water). Results show that the inhabitants in all study areas have easy access to water. Table 7.3-5 presents household's source of drinking water.

Table 7.3-5: Households' Sources of Drinking Water

Sources of Drinking Water	Proposed Routes (%)	Car Wash Park (%)	Existing Lumley Market (%)
Pipe borne water	57.1	60.9	100.0
Buy from private vendors	42.9	30.4	0.0
Rain water	0.0	4.3	0.0
Unprotected spring	0	1.4	0.0
N-Value	21	69	1

Source: CEMMATS/IRUMP RAP Census and Socio-Economic Survey, 2018

76.2% of households along the proposed routes reported they use electricity supply from the national grid to light their homes, 9.5% use generators to supply electricity to their homes for lighting and 14.3% reported they use portable "Chinese" lights to light their homes. More than half (**66.7%**) of household at the Car wash park use electricity supply from the national grid, 31.9% use "Chinese" light to light homes, whilst the one household at the market uses 100%

electricity supply from the national grid. This indicates good access to electricity by all residing households assessed within the RAP project boundary.

Households' access to improved sources of energy for cooking at home depict a good living condition. This is so because the type of energy used for cooking could have health implications on the user. **76.2%** of households along the proposed routes are reported to use charcoal for cooking and only **23.8%** use a better energy source for cooking – gas.. **82.6%** of households at the Car wash park report they use charcoal, **10.1%** wood and only **7.2%** use an improved energy source source for cooking.

Health and Health Infrastructure

The project sites, including proposed routes, existing market and Car wash park host no health centre or hospital. This however does not signify difficulty in accessing health services for the project's PAPs. Households within project sites reported they have all heard about HIV/Aids, even though far less than half (31.4%) of them have been tested at least once for HIV/Aids.

As indicated in the following table, the most prevalent disease for the households is Malaria accounting for the illness of about 71.4% of households along the proposed routes, 52.2% for households at the Car wash park and 100% of the existing market over the last one year before survey date. Typhoid is also reported to be on the high side (21.7% of households) of the car wash park and 4.8% for the households along the proposed routes. This explains why at least one family member fell sick from malaria or typhoid within the last one year.

Table 7.3-6: Household Disease Prevalence over the Last 1 Year

Diseases	Proposed Routes (%)	Car Wash Park (%)	Existing Lumley Market (%)
Cancer	0.0	0.0	0.0
Cholera	0.0	0.0	0.0
Diarrhea	0.0	2.9	0.0
Malaria	71.4	52.2	100.0
Respiratory disease	0.0	2.9	0.0
Tuberculosis	0.0	2.9	0.0
Typhoid	4.8	21.7	0.0
N-Values	21	69	1

Source: CEMMATS/IRUMP RAP Census and Socio-Economic Survey, 2018

Livelihood, Income and Expenses

Household’s livelihood outcomes are most often dependent on income level of the household, whilst household expenditure is also a function of household income. Some of household’s outcomes may include better wellbeing and improved standard of living of household. This explains that the higher the income levels of household/person, the greater the propensity of that household to live an improved standard of living and to better the wellbeing of its members. The income level is greatly influenced by the type of economic activity/activities the household engages in - whether more profitable or less profitable.

Of all household members assessed, 100% of households at the existing market are engaged in small scale business/shop, 36.2% of those households residing along the proposed routes reported they are engaged in economic activities such as masonry; carpentry and agent, 5.7% are wage/salary earners and 6.7% are engaged in car washing at the Car wash park. 20.3% of households at the Car wash park are engage in trading activities (of varying items), 8.6% in car washing and 19.3% reported doing no economic activity at the movement.

Analysis shows low economic profile with numerous informal and less profitable economic activities for all areas assessed. This would mean that livelihood restoration programmes for all PAPs living at project sites must be given keen consideration.

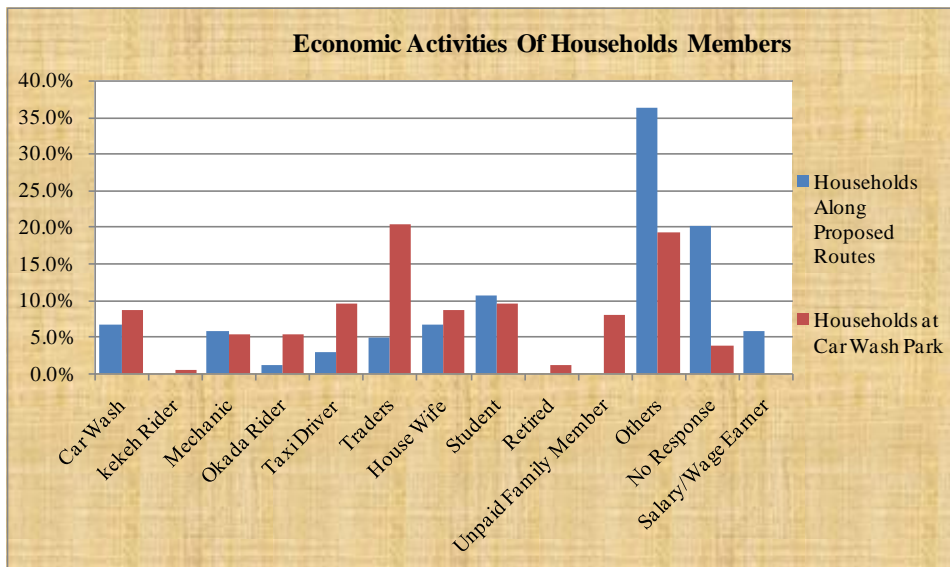


Figure 7.3-3: Economic Activities of Household Members

The low economic profile of the assessment areas is evident from the income level of households in this survey. The average monthly income from formal employment for households along the proposed routes is Le 2,691,250; average monthly income from casual labour is Le 1,171,428; average monthly income from business enterprises is Le 1,856,666.7. The households at the Car Wash Park have an average monthly income from business work of less than one million Sierra Leonean Leones- Le 1,009, 329 for the Car Wash Park as average monthly from formal employment, Le 935,518.5 as monthly average from casual work and Le 763,421 as average monthly earning from businesses.

Table 7.3-7: Average Income of Households

Assessment Areas	Average Monthly Income from Formal Employment (Le)	Average Monthly Income from casual Work (Le)	Monthly Average Income from Business enterprises (Le)
Proposed routes	2,691,250.0	1,171,428.6	1,856,666.7
Car Wash Park	1,009,329.3	935,518.5	763,421.1
Lumley market	None	None	1,000,000

Source: CEMMATS/IRUMP RAP Census and Socio-Economic Survey, 2018

Table 7.3-8: Average Expense of Households

Survey Areas	Average Monthly Expenses on Business (Le)	Average Monthly Expenses on Food (Le)	Average Monthly Expenses on Education (Le)	Average Monthly Expenses on Medical (Le)
Proposed routes	6,990,909.1	1,216,666.7	3,387,500.0	320,000.0
Car Wash Park	2,535,638.5	792,324.4	988,805.0	76,325.4
Lumley market	No Response	No Response	No Response	Le 80,000

Source: CEMMATS/IRUMP RAP Census and Socio-Economic Survey, 2018

Social Networks

The market women at Lumley come from various areas of Freetown and many have worked together for years. They have a market women's association to cater for their collective requirements in terms of meeting city council regulations, articulating their needs and support to each other, especially in times of distress e.g. for bereavements. There are several associations at the car wash site including the main association for car wash operators. They use their association for seeking their collective interests. As is shown by the socio-economic surveys, many residents in the project area belong to various social, religious and cultural groupings.

Social and Cultrual Characteristics

Most of the PAPs are market women who live outside the project area. The area has several social facilities, including entertainment centers for food and drinks. There are very few cultural facilities. There is a mosques at the car wash site. A few children use open spesces for playing football.

Business Survey and Census

A total census was conducted for all persons owning business enterprises within the RAP project boundary. A total of 654 business persons were assessed from two locations: Car Wash Area (including proposed access routes) - (96) and the Lumley existing market (558). A preponderant proportion - (85.6%) of business owners at the existing market are female and 57.4% of business owners at the Car Wash Area (including proposed routes) are male.

Table 7.3-9: Gender of Traders/Business Owners

Assessment Areas	Male (%)	Female (%)
Existing Market Traders	14.4	85.6
Car Wash Business Owners/Traders	57.4	42.6

Source: CEMMATS/IRUMP RAP Census and Socio-Economic Survey, 2018

Of the 558 traders/business owners at the existing market, 59.5% are married to at least one spouse whilst a significant proportion (40.5%) of them are either widowed, never been married, divorced or in a consensual union. 79.2% of the 96 business owners at the Car Wash Park and along proposed access routes are married to at least one spouse and 20.8% are either living widowed, never married, divorced or in a consensual union.

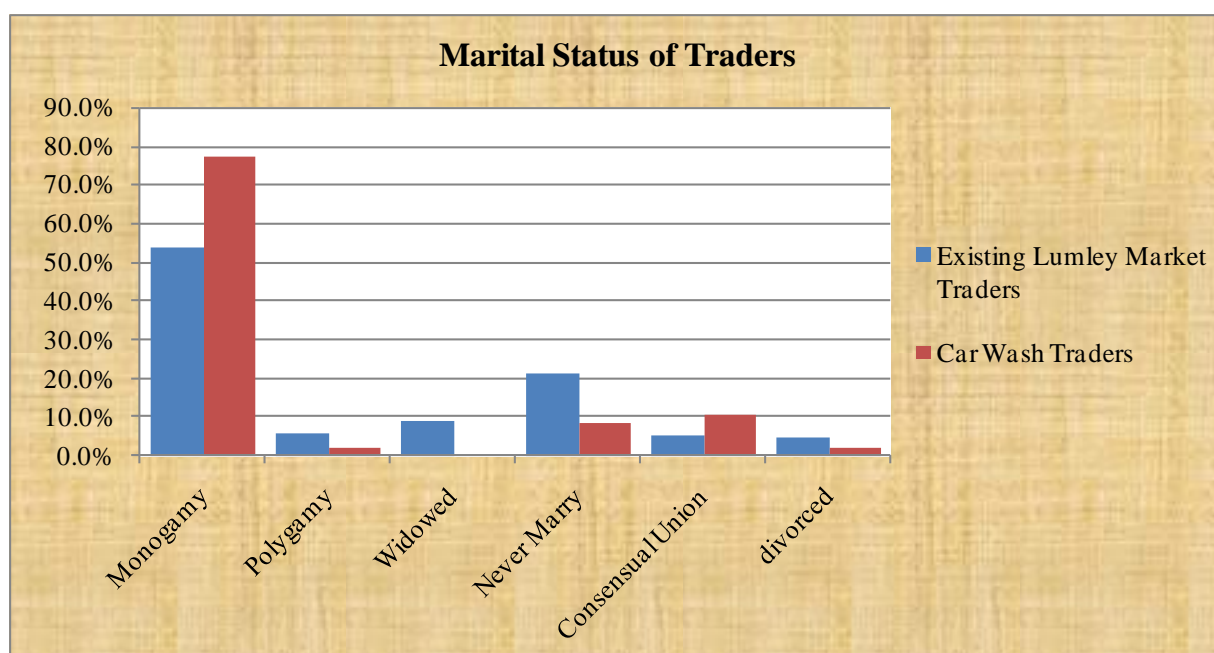


Figure 7.3-4: Marital Status of Traders/Business Owners

Vulnerability Context

Out of 477 women at the Lumley existing market, a significant proportion of 20.8% have never been married whilst 2.7% have divorced their spouse and 10.5% are living widowed. Of the 40 female owned business at the Car wash area and proposed access routes, 12.5% have never been married whilst 5.0% have divorced their spouse.

9.9% of traders/business owners at the Lumley market bring their children (<18years) to their business places during school hours and 8.3% at the car wash park also bring their children to their business places during school hours.

Of the 192 business owners at the existing market who reported they have assistants to their business, 3.1% of these assistants are disabled whilst 22.4% are children. 3.3% of the assistants at Car wash area are disabled whilst 15.0% are below 18years.

These analyses indicate a picture of a high vulnerability index for a significant proportion of women and children at the existing market and a medium index for the same category of people at the Car wash area. This situation therefore requires special consideration during resettlement and subsequent monitoring of the RAP programmes.

Table 7.3-10: Vulnerability Context

Variables	Existing Market (%)	Car Wash Area (%)
Widowed	10.5	0.0
Never marry	20.8	12.5
Divorced	2.7	5.0
N-Values	477	40
Variables	Existing Market (%)	Car Wash Area (%)
Children Come to you at market during school H hrs	9.9	8.3
N-Values	558	96
Variables	Existing Market (%)	Car Wash Area (%)
Disable a ssistant	3.1	3.3
Child assistant	22.4	15.0
N-Values	192	60

Source: CEMMATS/IRUMP RAP Census and Socio-Economic Survey, 2018

On average, these business owners have been doing business for about 23.3 years and reasons given for doing business at the current location are plotted in Figure 7.3-5. About 54.8% on both sides reported they moved into current locations because they are attractive for sales. At the existing Lumley market, 20.4% of the traders inherited their business locations/places from either their parents or family members and only 6.3% at the car wash site have inherited the business locations/places from either their parents or family members. 12.2% of traders at the Lumley have been displaced from previous locations and 18.8% at Car Wash Park have been displaced from previous business locations.

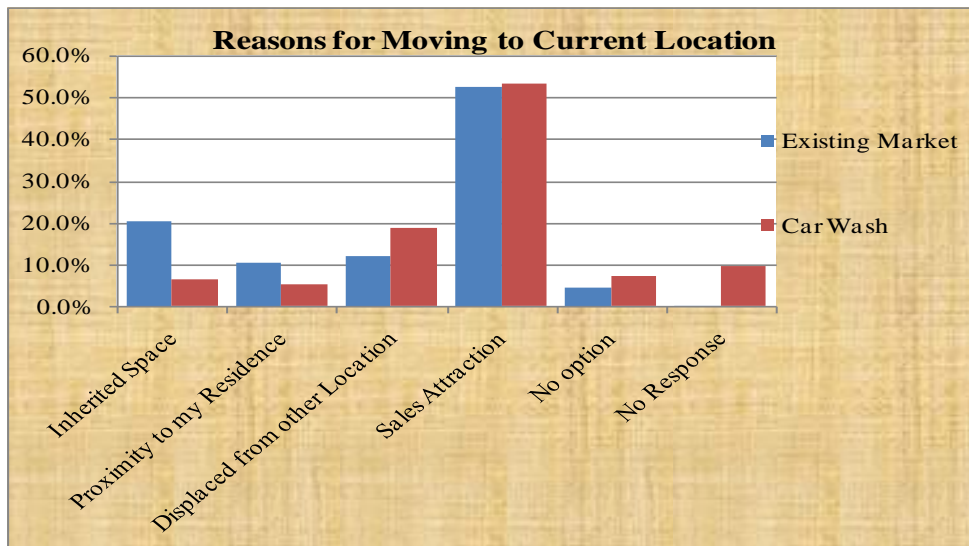


Figure 7.3-5: Reasons for Moving into Current Location

At both the existing market and car wash park, various types of businesses are carried out by business owners. Some are only found in one area whilst others are common to all areas. For instance, sale of food stuff is common to all locations whilst bars, tailor shops, spare and repair shops are only at the car wash area. Analysis shows that a preponderant proportion (90.4%) of traders enumerated at the Lumley market sell at least one type of food stuff in the market. Nearly 50% of the traders at the car wash area are engaged in the sale of food stuff. About 20% at the car wash area are engaged in repairs and sales of spare parts– this include repairs of vehicles, equipment and electronic materials (phone and other electronic materials). More than 10% are engaged in sales of alcohol and other types of drinks at the car wash area. Table 7.3-6 presents the type of businesses undertaken by PAPs.

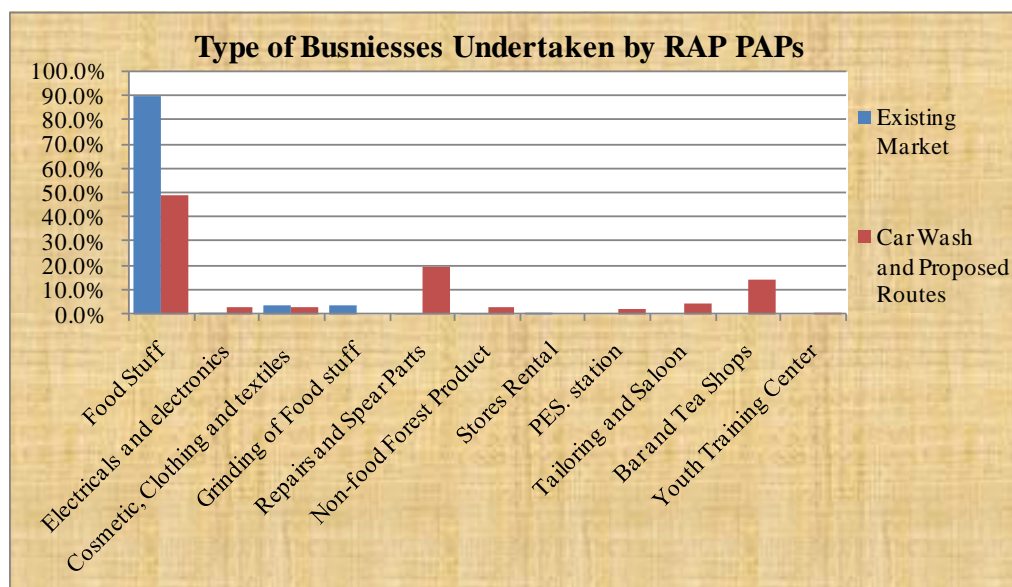


Figure 7.3-6: Type of Businesses Undertaken by PAPs

Access to Potable Water

On both sites, there are communal pipe borne water pumps which are managed by internal administrative arrangements – the chairman of the Car wash for the car wash and at the Lumley market by chairlady and chairman. At the Lumley market, there is a reservoir of about 10,000 litres that is used to keep water for use by traders at the market.

Even though there is a pipe borne water source available within the Lumley market, far less than half (39.8%) of them use the readily available water sources for drinking purposes whilst more half (56.3%) of the traders at the Car wash area use the pipe borne water source for drinking purposes. 60.0% of traders at the Lumley market and 41.7% at the Car wash area reported they buy water from private vendors (sachet/packet water) for drinking purposes.

The analysis shows that business owners within the project boundary have got access to a source of water. Figure 7.3-7 presents the source of drinking water.

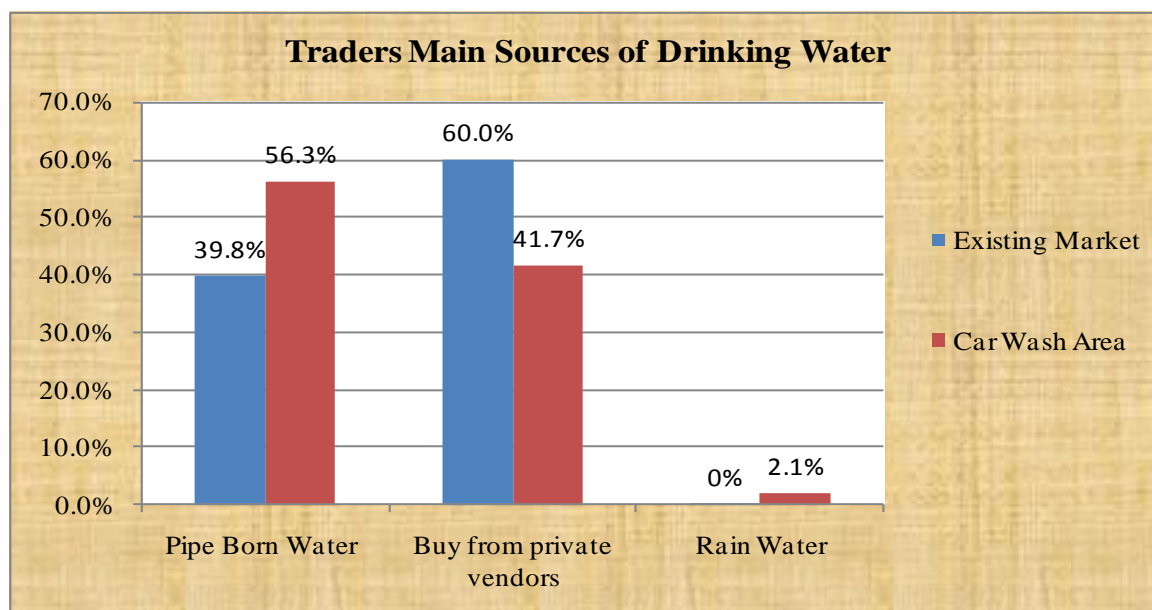


Figure 7.3-7: Source of Drinking Water

Livelihood and Profit Margin and Expenses

The average monthly profit margins are calculated for both the Car wash area and Lumley market.

21.0% of traders at Lumley market reported they experienced some form of food shortage in the last one year, whilst 15.6% at Car wash area reported they experienced some form of food shortage in the same period. They explained that the shortage occurred during the national election period when sales were slow.

Table 7.3-11: Food shortage

Food shortage	Existing Market (%)	Car Wash (%)
Yes	21.0	15.6
No	79.0	84.4

Source: CEMMATS/IRUMP RAP Census and Socio-Economic Survey, 2018

Access to Energy for Lighting

Traders' at the Lumley market access electricity from the national grid. However very few (<2%) use it in the market for their business. Nearly 70% of traders at the Car wash area use electricity from the national grid for business purposes. For example, the bars; repairs shops; electronic shops- all use electricity either from the national grid or generator for their business purpose.

Socio-economic situation at the Congo Cross and Ferry Junction intersections

Cumulatively, 107 structures and structure owners were enumerated from the Congo Cross and Ferry Junction intersections, of which 31 were from Congo Cross and the rest from Ferry Junction. Of the 107 structures enumerated, only 88.8% (95) of structure owners were interviewed of which 66.4% of PAPS interviewed were from the Ferry Junction intersection. Out of the 95 PAPS interviewed, women/females represent the highest proportion amounting to 57.9%.

About a quarter of all those interviewed have never been to school and about half have only attained primary school education. Over 80 percent of the PAPS are married- either monogamous or polygamous and only 11.6% have never been married before. No child or physical challenged person was found trading in those areas of the assessment.

Gender issues

At the Congo cross axis women are mainly in the food business, and other petty food items like sweets, biscuits, packet water and cigarettes. The team did not observe the presence of children at this place. According to some of these women, their children go to school in the morning and join them later in the day. In the case of experiencing any gender-based violence at the Congo Cross point, they unanimously agreed that they have not experienced any incidences of gender-based violence which they believe is due to the presence of the Police Station at the Congo cross junction (roundabout). This serves as a deterrent. The women however expressed fear at having being removed from that point without being sure of where they will be moved to. The team did not observe or interview any disabled or commercial sex workers at the Congo cross axis.

It is recommended that since there are just few women selling food at this axis, (a situation which grew up because of the presence of the drivers, bike riders and the Police), a makeshift be provided on the land that the drivers and bike riders will be moved to.

At the Ferry junction, women are engaged in petty trading, selling various kinds of goods (fruits, cooked food, used clothing, packet water, drinks, sweets, foot wears for both men and women, aluminium pots, second-hand tires etc.). Majority of the women sell in makeshift structures and the team did not observe the presence of children and the disabled. The women offered that their children go to school and cannot afford to take their children with them since majority of them come from distant places to sell their wares. Since the team did not observe any commercial sex workers, we enquired from them if they have any knowledge of their presence at the Ferry junction. The interviewees ascertained that they have not noticed commercial sex workers at the Ferry junction. They associated this to the Police presence which served as a restrictive measure. The women said that they will appreciate it if space is provided for them at the Peace Market, which for now is the only possible space they can get, to protect them from adverse weather conditions.

Assessment of Assets

A summary of the assets assessed

Table 7.3-12: Summary of Assets

Area	Location	PAP category	Type of structure assessed	Number of structures assessed	Number of structures not assessed	Reasons for non-assessment	Total land area for assessment (m2)	Comments
Aberdeen	Car wash	Business owners/residential	Make shift kiosks	3	N/A	N/A	32.68	
		Business owners	Containers	27	N/A	N/A	338.8	
		Business owners/Residential	Wooden Structure	11	N/A	N/A	341.78	
		Business/Residential structure	CI sheet houses	81	4	Claims that land belongs to external party	1474.45	Need to check with claimant
		Residential/Business structure/	Concrete /brick structures	20	1	1, Caretaker refused to be assessed	420.32	Need for meeting with some house owners
Aberdeen	Access roads to proposed park 1	Business structure	Wooden kiosks	1		N/A	5.32	
		Residential	CI sheets	1		N/A	45.82	
		Business Owner	Wooden	1			81.0	
		Business Owner	Container	1		N/A	5.32	
		Residential structure	Concrete /brick structures	1		N/A	12.0	Part of the house will be affected

Area	Location	PAP category	Type of structure assessed	Number of structures assessed	Number of structures not assessed	Reasons for non-assessment	Total land area for assessment (m2)	Comments	
		Residential house Fence	Sand Crete fences	10		N/A	703.35		
			CL Sheet	1		N/A	28.5		
		Garages		2		Claims that land belongs to external party	N/A	Need for meeting with some land owners	
	Access road to proposed park 2	Business structure							The four concrete structures are simple with five households each. The four houses are owned by one person.
			Wooden kiosks		1	N/A	N/A	1.56	
			Concrete		1	N/A	N/A	4.2	
		Residential structure/Asset	Concrete		4	N/A	N/A	282.39	
			CI sheets		1	N/A	N/A	6.93	
			Concrete Toilet		1	N/A	N/A	12.07	
			Stand pipe		1	N/A	N/A	1.82	
	Concrete Fence		3	N/A	N/A	266.58			
	Access roads to proposed park 3	Residential structure	Concrete /brick structures		3			521.64	Additional land space to be estimated
		Residential structure	CI sheet houses		4			261.87	Additional private land space to be estimated
		Facility with cultural value	Concrete structure		1	N/A	N/A	22.23	

Area	Location	PAP category	Type of structure assessed	Number of structures assessed	Number of structures not assessed	Reasons for non assessment	Total land area for assessment (m2)	Comments
	Access roads to proposed park 4	Business structure	CI sheet houses	3			166.33	Four concrete structures are affected.
		Business structure	Wooden kiosks	2	N/A	N/A	4.59	
			CI kiosk	1	N/A	N/A	30.4	
			Concrete Structure	4	N/A	N/A	41.25	
			Container	4	N/A	N/A	57.13	
		Residential structure	Sandcrete fence	4	N/A	N/A		
Lumley	Lumley Market	Business owners/Assets	1.Table	162	N/A	N/A		
			2.Store	10	N/A	N/A	159.41	
			3.Shop	16	None	N/A	129.15	
			4.Stand pipe	2	None	N/A	1.21	
			5. Grinding machine space	5	None	N/A	2.99	
Ferry Junction		Business structure	Makeshift wooden structures	9	None	N/A		

All categories of properties would be compensated for based on justification in lieu of termination of rental agreement. Information collected on the status of rental of properties (if applicable) from the census will be used to determine what financial provisions will be made. Considerations will be made for relocation allowances.

8. IMPACT OF THE PROJECT

Consultations were held with the Executive of the market women and Councillors of Constituency 132 and Ward Committee members. The Lumley market comprises of a perishables market which is housed in an old building and textile goods mainly sold on the streets; most of the traders are women. The risk of falling victim to thieves and rape is high as deduced from the high crime rate reported by respondents; the risk is further exacerbated as they face difficulty in getting transportation to return home. The issue of street trading has its own implications whose negative impact far out-weighs that of the positive effects. Women and children are left to the vagaries of the weather especially in the rainy season, leading to health problems. Traffic problems especially with the high number of ill-disciplined drivers and riders could lead to accidents, to which women and children are more susceptible. Such effects greatly affect women and other vulnerable groups.

In the Aberdeen car wash area, there are more men than women. This may probably be due to the nature of the work/activities carried out in this area. These are mainly male dominated nature of work; such as car wash, commercial vehicle driving, okada riding, garage work etc. Women and vulnerable groups are found in the trading sector like selling of cooked food and plastic water, sweets and biscuits and other little items.

The Lumley market women would often bring their children especially the younger children with them to market. They would baby sit, breast feed and at the same time sell their wares. For the children that are a little older, they help their mothers to sell cooking condiments like pepper, onions, maggi, garden eggs etc. - things that can be easily carried in a tray. Most of such children do not go to school because they have to give a helping hand to their mothers. It may also be due to the fact that the schools may be distant, and some mothers cannot afford to let their children go to distant schools.

Consequently, as part of the resettlement packet the IRUM project will consider providing a pre-school for the market women so that their children could get some education alongside with the trading skills. This has been incorporated into the market design.

Even though from observation there are few children the majority of them are not going to school; they are either roaming about looking for things they can pick-up and sell to earn some few Leones or helping their parent (s) in whatever work the parents might be involved in. The car wash is a breeding ground for children to develop depraved habits and possible criminals.

There are several people living with disability living in the project area-some doing business and others residing there. These have been captured in the census. The disabled people interviewed at the car wash site complained about the snatching of properties from them including mobile phones and occasional assaults on them. They requested that access to all facilities should be disable-friendly and asked for the provision of skills training for the disabled, provision of better wheel chairs and clutches, and provision of special toilet facilities.

A number of widows and single women have also been captured in the households. A sizable proportion of the market women have never been married and some are widowed.

These people are extremely vulnerable and have therefore been given special consideration in compensation measures.

Commercial sex workers interviewed at the car wash site complained about stabbing of individuals particularly women in the commercial sex trade, snatching of mobile phones and illegal drugs being sold at the site.

The following tables summarize the deliberations of meetings with commercial sex workers at the car wash site and the disabled at the car wash site.

Table 7.3-1: Summary of Discussions at Meeting with Disabled Persons at Lumley Car Wash

Pre-set Questions	Participants' Responses
As a disabled person, what is your view concerning this project?	It is a good project; it will help facilitate the movement of disabled people
Do you think this project will affect/impact your life? If yes, how?	Yes. The project will make some of us homeless and affect our normal lifestyles.
Do you experience any discrimination in the car wash area?	We experience a lot of discrimination, but we are never taken seriously by the police when we report to them.
Do you know how many disabled people there are in the car wash area?	There are 25 disabled people, 14 of which live within the car wash park
What are your expectations from this project?	Access to all facilities will be disable-friendly, Better accommodation facilities for the disabled, Skills training for the disabled, Provision of better wheel chairs and clutches, and Provision of special toilet facilities.
Do you have any fears associated with the implementation of this project?	Project will take away the already limited facilities available to the disabled There will be discrimination in the employment of the disabled during construction stage, and The disabled may never again be allowed to go back to the Car Wash Park
Do you experience gender based violence against disabled persons?	Yes, there have been instances where men have kidnapped disabled girls for up to one week to sexually abuse them, resulting in exposure to STDs and unwanted pregnancies
What kind of crimes are prevalent in the car wash area?	Snatching of properties including mobile phones from people, particularly from the disabled, Stabbing Gambling,

Pre-set Questions	Participants' Responses
	Prostitution, Drug dealing
Have you participated in consultations on this project prior to this one?	Yes, some of us participated in the consultative meetings and also in the socio-economic survey.
Do you have any recommendations for this project?	Everything should be done to ensure that the facilities are disabled persons-friendly, and The project should change the life style of the disabled people for the better.
What do you think should be done to make the resettlement process less difficult for PAPs?	Pay adequate compensation to PAPs, Pay compensation before actual time of relocation, Allow PAPs to remove all moveable properties before commencement of construction activities, and Where possible provide land for people whose land and property will be destroyed during the implementation of the project.
<i>Other Contributions from Participants:</i>	
No additional comments/questions were made/asked.	

Table 7.3-2: Summary of Discussions at Meeting with Commercial Sex Workers at Lumley Car Wash

Pre-set Questions	Participants' Responses
Had you heard about the Integrated and Resilient Urban Mobility Project prior to this meeting?	Yes
What are your views concerning the proposed transport project?	It is a good project and will reduce time spent in traffic.
What in your own opinion are the main advantages of IRUMP?	The project will promote the safety of road users
What in your opinion are the main disadvantages of IRUMP?	The displacement of homes and businesses
What are your expectations from this project?	Provision of employment facilities for us, Provision of micro-credit facilities for us, and Provision of better accommodation facilities for us or give us adequate compensation that will take care of our accommodation expenses.

Pre-set Questions	Participants' Responses
What are your fears, if any, concerning the implementation of the transport project?	Uncertainty about relocation package for the Project Affected Persons, and Loss of accommodation
What crimes are prevalent in this area	Stabbing of individuals particularly women in the commercial sex trade, Snatching of mobile phones from the public and Trade in illegal drugs.
How would you handle the problem of accommodation if you were asked to leave the Car Wash Park?	We would find other accommodation if we are given a substantial relocation package
Have you participated in any Skills Training programme?	We have not, but would be very willing to attend to learn something that would give us an alternative to our current livelihood
Do you know how many commercial sex workers are operating in the car wash area?	15; all living within the car wash park
How much do you make per day on average?	Le 50,000 – 100,000 daily
<p><i>Other Contributions from Participants:</i> No additional comments/questions were made/asked.</p>	

9. PUBLIC CONSULTATION AND DISCLOSURE

9.1 Summary of Consultations

Several public consultation sessions were held with various stakeholders. These included face-to-face interviews, focus group discussions and interviews. A summary is provided in Table 9.1-1.

Table 9.1-1: Summary of Consultations

No	Date	Stakeholder Group	Key Stakeholders Present	Issues Discussed	Outcome
1.	22/08/18	Meeting with Lumley Market Women	<ol style="list-style-type: none"> 1. Unisa Kamara, Coucillor Ward 444 2. Kadiatu Tarawali, Chairlady, Lumley Market 3. Mabinty Turay, Deputy Chairlady, Lumley Mkt. 4. Abdul Kaloko, C/man, Lumley Petty Traders Union, 5. Abdul F. Kamara, Lumley Market Secretary 6. Mabinty Kamara, Lumley Market Secretary, 7. Gibrilla Bangura, Ward 444 Committee Member, 8. Emiley Carew, Lumley Market Mammy Queen 	Concept of proposed IRUMP explained and discussed	<p>Proposed site for relocation of market is in constituency 131, quite different from constituency 132 where current market is located.</p> <p>Governance of market should be under governance of current Lumley Executive and market should retain its current name of Lumley market.</p>
2.	27/08/18	Meeting with Freetown City Council Officials	<ol style="list-style-type: none"> 1. Bangali F. Marrah, Deputy Chief Admin. 2. Mariama Conteh, Secy. Municipal Trade 3. Abdul K. Marrah, Dev. & Planning Officer 4. Awuna Sowa, City Engineer 5. Sylvester Thomas, Resident Tech. Facilitator 6. Tennehma Rogers, M. & E. Officer 	Concept of proposed IRUMP explained and discussed	<p>FCC involved in planning of project. Need for a bigger market at Lumley to accommodate existing market and street traders. Proposed market should be integrated with modern toilet facility and Day Care school. road from Action Aid should serve as access road to market and car park.</p>

No	Date	Stakeholder Group	Key Stakeholders Present	Issues Discussed	Outcome
3.	27/08/18	Meeting with Ministry of Transport & Aviation	1. Haroun Conteh, Finance Manager, Transport Infrastructure Development Unit (TIDU) and Acting Director, Policy & Planning, Ministry of Transport & Aviation	Concept of proposed IRUMP explained and discussed	MoTA was totally involved in the of the project, stakeholder committee for the project included various Government ministries and agencies, market should be integrated with facilities such toilet system, pre-school, and more.
4.	28/08/18	SLP - Lumley Police Division	1. Andrew M. Kamara- LUC 2. Fallah J. Mbayo, Crime Officer 3. Alphonso A. Fahmbulleh, Operations Officer	Concept of proposed IRUMP explained and discussed	Proposed location of market and car park is ideal; police post to be constructed at site, various interest groups to form associations that will collaborate with police to combat crime.
5.	28/08/18	Family Support Unit- Lumley Police Division	1. Alim Sesay, Assistant Supt. Police 2. Alhassan Turay, Assist Supt. Police 3. M.S. Kamara, Non Commissioned Officer	Concept of proposed IRUMP explained and discussed.	Very happy about the implementation of the proposed project. Police to be empowered to enforce law against street trading.
6.	28/08/18	Meeting with MP and Councillor of Project Area	1. Mohamed S.R. Coker, Hon MP, Constituency 131, 2. T.K. Simbo, Councillor, Ward 442	Concept of proposed IRUMP Concept of proposed IRUMP explained and discussed P explained and discussed	A very good project. Will give support and cooperation when needed.
7.	30/08/18	Meeting with Freetown City Council Environment & Social Officer	1. Sulaiman Z. Parker, Environment & Social Officer	Concept of proposed IRUMP explained and discussed	Rationale of the project initiation in Freetown is very good and will ultimately lead to decongestion of the city and enhance safety of traders and passengers.

No	Date	Stakeholder Group	Key Stakeholders Present	Issues Discussed	Outcome
					It will lead to loss of revenue to FCC in the short/medium term but long term benefits far outweighs these losses.
8.	31/08/18	Meeting at Car Wash Area	<ol style="list-style-type: none"> 1. Alhaji Kamara, Assistant Chairman 2. Alex Joe, Adviser, 3. Allieu Kamara, Adviser, 4. Ibrahim Sorie Kargbo, Adviser, 5. Jewel Jonah, Adviser 6. Mohamed Koroma, Adviser, 7. Masieray Mansaray, Chair Lady 	Concept of proposed IRUMP explained and discussed.	Car Wash Area personnel ready to move but need adequate compensation. Market stalls should be provided at affordable prices.
9.	31/08/18	Meeting with LUC Congo Cross Police	<ol style="list-style-type: none"> 1. Foday Sesay, LUC Congo Cross Police Division 	Concept of proposed IRUMP explained and discussed.	Proposed project is good and look forward to its early implementation. Congo Cross Police communicate with various stakeholders through the Police Partnership Board comprising representatives of all interest groups. Security and safety matters are discussed in these meetings.
10.	03/09/18	Meeting with Mayor, Freetown City Council	<ol style="list-style-type: none"> 1. Yvonne Aki-Sawyerr, Mayor of Freetown Municipality 	Concept of proposed IRUMP explained and discussed.	Lumley market is insufficient resulting to street trading. From a previous engagement, the street traders are willing to move to the relocated site. By and large the project be positive for Freetown. Ministry of Transport and Aviation has regularised transfer of land for the proposed site to be transferred to

No	Date	Stakeholder Group	Key Stakeholders Present	Issues Discussed	Outcome
					FCC. The relocated site for the market should have these facilities
11.	03/09/18	Meeting with Ag, Assistance Director, Lands	1. Abraham Cooper, Acting Assistant Director, Lands	Concept of proposed IRUMP explained and discussed.	The project is very good as it will help to decongest Freetown and enhance safety of street traders, passengers and pedestrians. Facilities such as water and electricity, toilet and storage should be provided at the relocated market site.
12.	03/09/18	Meeting with Ferry Owners.	1. Mohamed Fahad, Director, MV Great Scarcies Navigation, 2. Kalid Fahad, Deputy Director, MV Great Scarcies Navigation, 3. Yassim, Coordinator, MV Great Scarcies Navigation.	Concept of proposed IRUMP explained and discussed.	A lot of dirt/mud at the ferry landing stage leading to overheating of the ferry, ramp on which passengers walk to board the ferry is damaged and will collapse at any time, only one ferry in operation leading to increased running hours, no Standard Operating Procedures (SOP) for the ferry, no safety signs on ferry and under-age children not allowed to travel on ferry.
13.	18/09/18	Meeting with key stakeholders to discuss draft RWG and GRM	1. Hon. Mohamed S.R. Coker, MP, Const. 131 2. Unisa Kamara, Councillor, Ward 444, 3. Mohamed T.K. Simbo, Councillor, Ward 442, 4. Kadiatu Tarawallie, C/Lady, Lumely Market,	CEMMATS Group Limited contracted to prepare ESIA and RAP for the IRUMP. Draft GRM and Draft composition of RWG, entitlement matrix of relocated people, commencement date and	Final drafts of GRM and RWG documents approved by participants after some amendments. Census of PAPs and socio-economic surveys to start on 20/09/18 for a duration of 7days. 18/09/18 was agreed upon as cut-off date.

No	Date	Stakeholder Group	Key Stakeholders Present	Issues Discussed	Outcome
			<ol style="list-style-type: none"> 5. Masieray Mansaray, C/Lady, Car Wash Park, 6. Alhaji Kamara, D/Chairman, Car Wash Park, 7. Foe Alex, Chairman, Car Wash Park, 	duration of census and socio-economic survey, and cut-off date for the project.	
14.	21/09/18	Focus Group Discussion meeting at Car wash park with petty traders, small business owners, owners of permanent and makeshift structures	<ol style="list-style-type: none"> 1. Joe Alex, Chairman; 2. Joe Janneh, Tyre Repairman; 3. Aiah Alpha, Fitter; 4. Amid Koroma, Welder; 5. Sajid Marah, C/man Tailors; 6. Sahr Borbor, Okada Rider; 7. Mohamed Mannah, Petty Trader; 8. Brima Kargbo, Petty Trader; 9. Mohamed Bah, Mechanic; 10. Sheku Kanu, Petty Trader; 11. James Borbor, Shoe Mechanic; 12. Tamba Fillie, Petty Trader; 13. Abu Kargbo, Black Smith; 14. Maseray Mansaray, Chair Lady; 	Views, perceptions and concerns of the participants about the proposed IRUMP.	<ul style="list-style-type: none"> • One participant has a Training Centre with fifteen (15) trainees in welding and design. This participant is worried about what will happen to trainees during the construction period as most of them are coming from the Provinces and face accommodation problem. • There will be a loss of income during the period of construction • Agriculture Ministry has a big compound which would have been ideal for the relocation of the Lumley market • Residents having containers in the Car Wash Park are requesting for the transfer of their containers to the Agriculture compound during the construction period.

No	Date	Stakeholder Group	Key Stakeholders Present	Issues Discussed	Outcome
15.	21/09/18	Focus Group Discussion Meeting with Drivers Union Executive, Okada Riders and other Commercial Vehicle Drivers that ply Congo Cross Bottom Mango route.	<ol style="list-style-type: none"> 1. Ibrahim Bah, Secretary Drivers Union; 2. Isatu Bah, Deputy Secretary; 3. Ansumana Ngobeh, Secretary General, Drivers Union; 4. Bademba Barrie, Chairman West; 5. Momodu Koroma, Chairman East; 6. Komboh Koroma, Deputy Sec. General; 7. Lamin Conteh, Chairman Poda Poda Drivers; 8. Abdul Koroma, Chairman, Okada Riders; 9. Muctarr Barrie, Okada Rider; 10. Alpha Turay, Poda Poda Driver; 11. Anthony Sesay, Poda Poda Driver, 12. Alimatu Barrie, Secretary, Drivers Union; 	Views and perceptions, merits and demerits of the IRUMP as judged by participants.	<p>The participants welcomed the project as it will lead to the development of the Freetown Municipality. They provided the following information which will enhance the faster and safer movement of pedestrians and vehicles within the city:</p> <ul style="list-style-type: none"> • on average, 80 taxis ply the route daily to Bottom Mango, • the Drivers' Union Executive would like the taxi and poda-poda drivers at Congo Cross to be relocated to a Government Land that is situated behind the Congo Cross Police Station on Signal Hill Road, • provide adequate car parks for vehicles particularly in the Central Business District, • build market for all street traders on Guard Street and construct a four-lane road on Guard Street. This will facilitate the flow of traffic without any destruction to property. The traffic from Guard Street can be diverted to East-End Police Station or through an abandoned railway bridge at the back of East-End Police Station, • provide markets to take off traders from the streets, and

No	Date	Stakeholder Group	Key Stakeholders Present	Issues Discussed	Outcome
					<ul style="list-style-type: none"> provide traffic lights at Congo Cross roundabout.
16.	22/09/18	Focus Group Discussion Meeting at Kissy Ferry Junction with Police, Okada Riders, Petty Traders, Kekeh and other commercial vehicle drivers.	<ol style="list-style-type: none"> Ibrahim Barrie, Poda Poda Driver; Wurie Kamara, Poda Poda Driver; Sorie Kamara, Petty Trader; Allieu Bah, Poda Poda Driver; Amadu Bah, Drivers Union; Ibrahim Bangura, Petty Trader; Yusuf Kanu, Petty Trader; Ibrahim Sesay, Petty Traders Union, Ibrahim Sow, Petty Trader; 	Views and perceptions, merits and demerits of the IRUMP as judged by participants.	<p>The participants were very happy about the project and made the following suggestions to actualise the aim of the project:</p> <ul style="list-style-type: none"> there is a big market close to the SLRA office that can be rehabilitated to accommodate all the street traders at Ferry Junction, maintain all feeder roads in the East-end of the City, provide a market for all traders on Guard Street and make a four-lane road on Guard Street. This can be done without any destruction to property, provide parking places for vehicles to allow free flow of traffic, construct t markets at King Jimmy and Fisher Lane to take traders off the streets, provide traffic light at Kissy Ferry Junction, and provide overhead walkways for pedestrians.

No	Date	Stakeholder Group	Key Stakeholders Present	Issues Discussed	Outcome
17.	24/09/18	Focus Group Discussion Meeting at Kissy Ferry Terminal with Police, petty traders, Okada riders and Kekeh drivers.	<ol style="list-style-type: none"> 1. Samuel Kpakima, Taxi Driver; 2. Andrew Janneh, Deputy Chairman, Drivers Union; 3. Ibrahim Kamara, Kekeh Driver; 4. Abu Bakarr Kamara, Poda Poda Driver; 5. Eugene Kargbo, Okada Rider; 6. Mohamed Jalloh, Kekeh Driver; 7. Kadiatu Sesay, Petty Trader; 8. Mabinty Kamara, Petty Trader; 9. Mariatu Sesay, Petty Trader; 10. Isatu Barrie, Petty Trader; 11. Alie Kamara, Labourer; 12. Abubakarr Bangura, Kekeh Driver; 13. Mohamed Koroma, Taxi Driver; 14. Emma Kamara, Petty Trader; 15. Maraiatu Jalloh, Petty Trader; 16. Mbalu Kamara, Caterer; 17. Joshua Kamara, Police Officer; 18. Josie Davies, Police officer; 	Views and perceptions of participants, merits and demerits of the IRUMP as judged by participants	<p>Participants were delighted about the project and suggested the following to the designers of the project:</p> <ul style="list-style-type: none"> • install traffic lights at major road intersections • provide adequate road safety signs on all roads • provide “Bus Stop” signs on major roads to ensure commercial vehicles do not stop at random, • provide overhead pedestrian walkways particularly in densely populated areas, and • ensure routine maintenance of all roads within the City to get rid of potholes.
18.	25/09/18	Focus Group Discussion Meeting at Lumley market with street traders, Kekeh and Poda Poda Drivers and Okada Riders.	<ol style="list-style-type: none"> 1. Abu Kargbo, Okada Rider and Drivers Union Rep; 2. Donald Fefegula, Kekeh Driver. <p>The following attendees are all Petty Traders from the Lumley Market and Lumley Street:</p> <ol style="list-style-type: none"> 3. David Saspo Sankoh, 	Views and perceptions of participants, merits and demerits of the IRUMP as judged by the participants	<p>Participants were happy about the project interventions in key areas within the city but expressed the following concerns about the project:</p> <ul style="list-style-type: none"> • loss of business during the period of construction or transfer to the Car Wash Park,

No	Date	Stakeholder Group	Key Stakeholders Present	Issues Discussed	Outcome
			<ol style="list-style-type: none"> 4. Abdul Kaloko, 5. Mustapha Turay, 6. Alhaji Cherno Jalloh, 7. Fatmata Munda, 8. Aminata Sesay, 9. Mohamed Kamara, 10. Kadiatu Tarawally, 11. Abubakarr Turay, 12. Isha Turay, 13. Fanta Koroma, 14. Mbalu Kargbo, 15. Kai S.Kellie, 16. Isatu Sesay 		<ul style="list-style-type: none"> • resettlement will mean loss of customers and business environment, • Lumley market is owned by the Lumley Community. What is going to happen to the existing market? • children of market women use to attend schools within easy reach. Relocating to the Car wash park will create problems for mothers who are market women.
19.	03/10/18	Focus Group Discussion Meeting with the disabled at the Car wash park	<ol style="list-style-type: none"> 1. Mohamed Mannah, 2. Allieu Amara, 3. Christine Kargbo, 4. Malcom Conteh, 5. Joshua Fortune, 6. Yaya Kargbo, 7. Philip T. James, 8. Masieray Mansaray, ChairLady, Car Wash Park, 	Views and perceptions of participants about the IRUMP.	The disabled hope the facilities at the new market and park will be disable-friendly and that special toilet facilities will be provided for the disabled at the new facilities. Greatest fear is that the project will take away from them the already limited available facilities such as accommodation. They are concerned about loss of income and whether they will ever again be allowed to return to the Car Wash Park where they have lived for a considerable period of time.
20.	08/10/18	Focus Group Discussion Meeting with Commercial Sex	<ol style="list-style-type: none"> 1. Kadija Anthony, 2. Sia Tengbeh, 3. Theresa Kanneh, 	Views and perceptions, merits and demerits of the	Participants welcome the project. However concerns expressed about prospect of losing accommodation and

No	Date	Stakeholder Group	Key Stakeholders Present	Issues Discussed	Outcome
		Workers at Car Wash Park	<ol style="list-style-type: none"> 4. Mariatu Kamara, 5. Fatmata Kanu, 6. Fatmata Kamara, 7. Jebba Kalkor, 8. Masieray Mansaray, C/Lady, Car Wash Park, 9. Mariama Kamara, 10. Lizzy Kaikai, 11. Fatmata Kargbo, 12. Musu Dennis, 13. Fatmata Kamara, 14. Hajariatu Kamara, 15. Fatmata Kamara, 16. Bintu Jebbie 	IRUMP as judged by participants	income particularly during construction period. Over half of the participants expect to get employment when the project starts. A total of approximately 15 Commercial Sex workers are operating in the Car Wash Park.
21.	11/10/18	RWG Meeting	<ol style="list-style-type: none"> 1. Mahmoud Seisay, Property Owner; 2. Unisa Kamara, Councillor Ward 444; 3. Kadiatu Tarawalie, Chair Lady, Lumley Market; 4. Isatu Bangura, Street Trader; 5. Ferrymusu Sawanneh, Street Trader; 6. Abdul Kalokoh, Shop Owner, Lumley Market; 7. Mbalu Kamara, Table Owner; 8. Mary Bangura, Table Owner; 9. Fatmata Turay, Street Trader; 	Reiteration of cut-off date for the project, Grievance Redress Mechanism, Composition of Resettlement Working Group, Compensation for tables used by multiple traders .	18th September 2018 was reiterated as the cut-off date for the project. CEMMATS to produce another draft of GRM based on comments made by stakeholders in the RWG inaugural meeting, CEMMATS in collaboration with Car Wash Committee to investigate allegation of marginalization on political grounds, CEMMATS to share with Councillor the census results of store owners at Lumley Mkt.

No	Date	Stakeholder Group	Key Stakeholders Present	Issues Discussed	Outcome
			10. Abubakarr Dumbuya, Shop Owner; 11. Hon. MP, Coker; 12. Maseray Mansaray, Chairlady Car Wash; 13. Mohamed Koroma, Car Wash; 14. Joe Alex, C/man, Car Wash; 15. Mohamed TK Simbo, Councillor Ward 442;		
22.	10/10/18	Meeting with private property owners along access road to Car Wash and Terminal	1. Sylvanus Cookson, 2. Aruna Lumeh, 3. Sheku Thomas, 4. Ajibu Bundu, 5. Amid Bundu, 6. Tamba Gbavaa, 7. Alhassan Sankoh, 8. Andrew Thomas, 9. Mahmoud Seisay, 10. Sheilla Peters, 11. Flora Austin, 12. Ibrahim Sillah, 13. Kemoh Kamara, 14. Zainab Dumbuya, 15. Ilara Whyte, 16. Leah Robert, 17. Kadie Dumbuya,	Views and perceptions of property owners of IRUMP; Purpose of meeting; compensation criteria; setting up of Resettlement Working Group	The meeting was well attended, and participants welcome the project. Concerns expressed: the kick-off time of the project; how much of our properties will be affected; air and noise pollution; road will de-value our property; increase in crime rate; how are our properties going to be valued

9.2 Focus Group Discussions

Five (5) Focus Group Discussion meetings were held in the various project areas. The results for the meetings with the disabled and sex worker groups have already been mentioned.

Table 9.2-1: Focus group discussion meetings held

Meeting Location	Details
Lumley Car Wash	<p>Date: 21st September 2018</p> <p>Time: 10:00 – 10:45am</p> <p>Target Participants: Petty traders, small business owners, owners of permanent and makeshift structures</p> <p>Total Participants: 17</p>
Congo Cross (Clay Factory)	<p>Date: 21st September 2018</p> <p>Time: 11:30am – 12:15pm</p> <p>Target Participants: Motor Drivers Union Executive, commercial transport drivers (taxis, motorbikes and tuk-tuks)</p> <p>Total Participants: 15</p>
Kissy Ferry Junction Intersection	<p>Date: 22nd September 2018</p> <p>Time: 11:00 – 11:40am</p> <p>Target Participants: Petty traders, Commercial Drivers' Union Executive</p> <p>Total Participants: 12</p>
Kissy Ferry Terminal	<p>Date: 24th September 2018</p> <p>Time: 12:45 – 13:40pm</p> <p>Target Participants: SL Police, Petty Traders, Commercial Drivers</p> <p>Total Participants: 20</p>
Lumley Market	<p>Date: 25th September 2018</p> <p>Time: 10:15 – 11:00am</p> <p>Target Participants: Lumley market women, street traders, commercial vehicle drivers</p> <p>Total Participants: 18</p>

Meeting Location	Details
Lumley Car Wash (Disabled Persons)	<p>Date: 3rd October 2018</p> <p>Time: 11:00am – 12:00pm</p> <p>Target Participants: Disabled persons</p> <p>Total Participants: 10</p>
Lumley Car Wash (Commercial sex workers)	<p>Date: 8th October 2018</p> <p>Time: 12:00 – 1:00pm</p> <p>Target Participants: Commercial sex workers</p> <p>Total Participants: 18</p>

Each meeting started with silent prayers and self-introductions of the CEMMATS team and participants. The Lead socio-economic consultant, Mr. H. M. Kangbai, welcomed all participants to the meeting and stated the purpose of the meeting which was to consult with stakeholders on the proposed Integrated and Resilient Urban Mobility Project (FITUP).

Mr Kangbai explained to participants that the city of Freetown currently has a very high concentration of road users (private cars, okadas, kekehs, poda podas, pedestrians, traders and buses) who are all competing for the use of the roads which are often narrow in most areas. This he explained, had led to very heavy traffic congestion in most parts of the city.

He informed participants that the worsening urban transport situation in the city, had prompted the government to develop an Integrated Mobility Plan for Freetown, identifying key issues and laying down a strategic plan for Freetown. He added that the Government had also developed the Sierra Leone Transport Policy, Strategy, and Investment Plan. Mr Kangbai went on to explain that building on these past studies, the Government had now requested the World Bank to support preparation and implementation of an urban transport project to address short term issues and also develop a long term strategic plan. He highlighted the interventions proposed by the Ministry of Transport and Aviation under the IRUMP as follows:

- establishment of transit car park at Lumley Community (Kinston Upon Hull Way),
- construction of transit market at Lumley Community to relocate street traders, and
- options to reduce conflict between vehicles and pedestrians at Juba Hill Road, Regent Road Lumley, Lumley Beach Roundabout (Kingston Upon Hull Way), improvements in Congo Cross Circle and Kissy Ferry Junction, and improvements in Targrin, Kissy and Government ferry terminals.

Mr Kangbai assured participants that the listed interventions would not only improve mobility of vehicles and pedestrians in these areas but would also enhance road safety. He informed participants that for a project of this nature that would impact on the environment and communities, national and international legislation (EPA Act of 2008/2010 and the World Bank Policies) required that an ESHIA study be carried out and approved before work could commence.

Mr Kangbai explained the role of CEMMATS in this process, whom he said had been contracted by the Project Management to conduct the ESHIA studies for the project in compliance with and according to the requirements of national laws and international donor requirements.

Following Mr Kangbai's remarks, the meetings proceeded into open discussion sessions in which CEMMATS Consultants asked participants a prepared set of questions on their perceptions and concerns about the proposed project. The responses given by the participants at all the meetings were documented by CEMMATS Consultants and are presented in the following tables.

Table 9.2-2: Summary of Discussions at the Lumley Car Wash Meeting

Pre-set Questions	Participants' Responses
Have you ever heard about the proposed Integrated and Resilient Urban Mobility Project (IRUMP)?	Yes
What are your views on/reactions to the Project?	We welcome the project in our community but have some concerns.
What in your own opinion are the main advantages of IRUMP?	The Project will bring some sanity into the Lumley area, Petty thieving will be minimised, There will be free flow of traffic and pedestrians, and It will bring more development in the Lumley/Aberdeen area since business activities can be carried out in much less time.
What in your opinion are the main disadvantages of IRUMP?	Loss of income to PAPs during construction stage Possible legal action against PAPs who fail to make payments for monies borrowed to carry out their businesses, Loss of sleeping accommodation, Disabled are more vulnerable since nobody would like to accommodate them, Training facilities for welding and designing will be lost and most of the trainees are provincials with no alternative accommodation in Freetown. The construction stage of the project should be reduced to the absolute minimum time.

Pre-set Questions	Participants' Responses
Have you any suggestions on how to improve on traffic congestion within the City?	No parking signs in front of several shops in Lumley/Aberdeen Area is reducing the already narrow roads, and Street Traders should be relocated.
<p><i>Other Contributions from Participants:</i></p> <p>The Ministry of Agriculture Compound at Lumley could have been an ideal place for the relocation of the Lumley Market.</p> <p>The residents at Car Wash would be happy if their containers could be transferred to the Ministry of Agriculture Compound at Lumley during construction stage of the project.</p>	

Table 9.2-3: Summary of Discussions at the Congo Cross Meeting

Pre-set Questions	Participants' Responses
Have you ever heard about the proposed Integrated and Resilient Urban Mobility Project (IRUMP)?	Only 1 participant reported having heard about the project; the rest had not.
What are your views on/reactions to the Project?	The project will bring immense development benefits to the city.
How many taxis, on a daily average, use the Congo Cross Round About as a Park for their taxis?	The car park sees a turnover of 80 users daily on average
If a decision is taken to relocate the taxis from Congo Cross Round About, where would you like to be relocated?	We would like to be relocated to Government land that is situated behind the Congo Cross Police Station on Signal Hill Road.
Have you any suggestions on how to improve on the traffic congestion in the Freetown Municipality?	<p>Provide suitable market and transfer all traders on Guard Street to the market. This will facilitate the construction of a four-lane road on Guard Street without any destruction to any property.</p> <p>Construct road passing through an old abandoned railway bridge by the East End Police Station. Traffic from the four-lane road on Guard Street would either use the normal route to East End Police Station or use the railway bridge to enter the city,</p>

Pre-set Questions	Participants' Responses
	<p>Provide adequate car parks for vehicles particularly in the Central Business District,</p> <p>Construct flyovers for pedestrians crossing roads in densely populated areas,</p> <p>Build markets to take Traders off the streets of Freetown, and</p> <p>Provide recognized bus stops for taxis and other commercial vehicles.</p>
<p><i>Other Contributions from Participants:</i> No additional comments/questions were made/asked.</p>	

Table 9.2-4: Summary of Discussions at the Lumley Market Meeting

Pre-set Questions	Participants' Responses
Have you ever heard about the proposed Integrated and Resilient Urban Mobility Project (IRUMP)?	All participants had heard about the project
What are your views on/reactions to the Project?	It is a good project and we are pleased to have it in our community
What are your views on relocating to a new market at Car Wash?	We do not have any problem with moving, as long as we are provided with adequate facilities to carry out our business.
What in your own opinion are the main benefits of your transfer to the new market at Car Wash?	<p>Business activities will be carried out more efficiently and in a reduced time frame,</p> <p>Safety of pedestrians and street traders will be enhanced,</p> <p>There will be faster movement of vehicles through the Lumley axis, and</p> <p>Street Traders at Lumley will carry out their business under shelter and will no longer be subjected to harsh weather conditions of rain and sunshine.</p>
What in your opinion are the main disadvantages of your transfer to the new market at Car Wash?	<p>Resettlement of traders will mean change of environment and loss of business customers, and</p> <p>There will be loss of income during the transfer period.</p>

Pre-set Questions	Participants' Responses
<p><i>Other Contributions from Participants:</i></p> <p>No additional comments/questions were made/asked.</p>	

9.3 Stakeholders' Views on Resettling

The following views were expressed by the PAPs on resettlement:

- the general feedback from initial consultations is positive as all stakeholders expressed satisfaction over plans for the implementation of the project.
- PAPs at car wash expressed their willingness to move from the site but asked whether they would be compensated for their structures and facilities situated within the project area.
- stakeholder generally suggested for the inclusion of the following facilities at the proposed market site: sanitary facilities, pre-school, cold storage, food sales, tyre repair facility, car wash, pharmacy, water and electricity.
- Lumley market traders requested that the market at the proposed site retains its present name of “Lumley market”

9.4 Host Community views in Lumley and Peace market

Site visit to both markets verified the availability of ample space for accommodating relocated market operators which are short distance from the current site. The space for Lumley market is unoccupied flood affected land with few encroachments to the site. Consultation with the operators at car wash site has have indicated that the inclusion of facilities in the new site will improve their working conditions and help attract market for their services.

Similarly, the open space ‘Peace Market’ is sufficient to accommodate the relocated PAPs. The provision of water and sanitary facilities are appreciated by the few operators in the peace market. In both sides, awareness has been created on project objectives and the time line for implementation. Participants were made aware of the grievance redress mechanism that will accessible to both relocated and host communities. Further consultation with both host and relocated communities will be conducted to facilitate implementation of the RAP.

Additional Focus Group discussions

Additional Focus group meetings were held with the following group members:

- taxis, poda-podas and okadas at Congo cross taxi stop that have to be moved;
- taxis, podapodas and okadas and kekeh at Lumley;
- Congo Cross Police station and Lumley Police station;;
- Kissy Ferry Junction – (Police, Okada, Kekeh and other commercial vehicle drivers)
- passengers at Kissy terminal.

Issues discussed included the following

- views on moving location (Especially for the Taxi drivers at Congo Cross parking space)
- where would they like to go?
- what suggestions do they have towards reducing traffic congestion in teach area
- crime statistics (especially from Police))
- accident statistics (especially from police)

9.5 Dissemination of RAP information

The Resettlement Action Plan development process was steered through by communication or dialogue with the stakeholders, and this is expected to continue until the implementation of the RAP is over. Extensive consultations with the potentially affected persons will continue through ongoing meetings with project affected people. The issues that have and will be discussed include:

- environmental and social impacts of the project;
- mechanism of asset valuation;
- mode of compensation/ assistance;
- extent of compensation, that is, who are entitled for compensation and why;.
- the proposed date of start of project;
- cut– off date;
- grievance redress mechanism;
- project design illustrated in a simple way so all PAPs understand the location and extent.

In addition to these issues for dissemination to the affected individuals, the following issues will be emphasized upon:

- PAPs making their issues, claims and concerns known.
- PAPs having right of access to the formally established grievance process and will be entitled to make their complaints known.
- The monitoring team having the right to visit and interview PAPs.
- PAPs through the grievance procedure process will be able to contact the monitoring and evaluation team to ensure that their concerns are heard.

Addressing specific concerns raised in the RAP

Specific concerns raised in these meetings have been addressed in the RAP. These are highlighted in the table below:

Table 9.5-1: RAP Concerns

Specific concerns raised	How they are addressed in the RAP
Proposed site for relocation of market is in a different political ward and constituency for Lumley market-there are concerns about loss of identity and perks.	Proposed that governance of market should be under governance of current Lumley Executive and market should retain its current name of Lumley market. Should endeavour to keep to old identity as best as possible
Need for a bigger market at Lumley to accommodate existing market and street traders. Proposed market should have modern toilet facilities and Day Care school. Alternative routes to market should be created.	Request incorporated into the design
Market stalls should be provided at affordable prices.	Issue of affordability discussed with FCC who will take this into cognisance.
The Drivers' Union Executive would like the taxi and poda-poda drivers at Congo Cross to be relocated to a Government Land that is situated behind the Congo Cross Police Station on Signal Hill Road,	This land was investigated but it is not government land. It is private land that could be sold at commercial prices. This issue should be explored further as there seems to be no available land in the vicinity.
<p>The following were suggestions made for the project with regards to the design:</p> <ul style="list-style-type: none"> • install traffic lights at major road intersections • Provide adequate road safety signs on all roads • Provide "Bus Stop" signs on major roads to ensure commercial vehicles do not stop at random, • Provide overhead pedestrian walkways particularly in densely populated areas, and 	These have been considered in aspects of the project design by the design team.
Concerns expressed about prospect of losing accommodation and income particularly during construction period. Some PAPs also expect to get employment when the project starts. Concerns also expressed about absence of training facilities	<p>PAPs told they will be paid adequate compensation-this has been incorporated into the compensation matrix. Priority for employment will also be given to qualified PAPs. Restoration of livelihood skills will be given consideration.</p> <p>PAPs intimated about possible timetable and given assurances of government's seriousness to implement the project. Road design and avoidance of overcrowding will</p>

Specific concerns raised	How they are addressed in the RAP
	minimise noise and air pollution. Security issues will be given priority by government.
Positive attributes of project cited include: <ul style="list-style-type: none"> • petty thieving will be minimised; • there will be free flow of traffic and pedestrians; • it will bring more development in the Lumley/Aberdeen area since business activities can be carried out in much less time. 	Augurs with plans for the project
Possible negative attributes of project include: <ul style="list-style-type: none"> • loss of income to PAPs during construction stage Possible legal action against PAPs who fail to make payments for monies borrowed to carry out their businesses,	These issues are addressed in the way the compensation matrix is designed

9.6 Setting up of a Resettlement Working Group (RWG)

Resettlement Working Group and its responsibilities

The Resettlement Working Group (RWG) will be the primary mechanism for engaging resettlement-affected households and other relevant stakeholders in resettlement planning. The Resettlement Working Group has been formed to plan and co-ordinate resettlement activities. The RWG will be established as part of the resettlement planning process. The RWG includes representatives of resettlement-affected households, local authorities (statutory and customary), the project RAP consultant (CEMMATS) and the Project Implementation Unit.

The responsibilities of the RWG in regard to the resettlement programme include to:

- identify, plan and coordinate the distribution of resettlement information to PAPs;
- inform local authority officials of the declaration of safety for resettlement and expected numbers that may return;
- keep the resettlement-affected households informed regarding the resettlement implementation process;
- identify vulnerable households that will require additional resettlement-related assistance;
- assess critical gaps in basic service provision within each area of resettlement and prioritise how these are to be addressed to ensure basic coverage within a reasonable timeframe;
- communicate the moratorium, and monitor the project site for encroachment;
- provide input to the resettlement planners regarding necessary preparations of the resettlement site;

- explore the opportunities for absorbing resettling displaced persons into income generating initiatives;
- advise the resettlement implementation team on feasible and useful livelihood restoration programmes (if applicable);
- monitor the resettlement implementation process and make recommendations regarding modifications if necessary (later stage);
- monitor and evaluate the resettlement process to ensure that people are relocated safety and dignity (later stage) and
- to play a part in grievance redress processes (please refer to Grievance Redress Procedures).

The full Terms of Reference is provided in the Appendices volume (Appendix 1).

10. COMPENSATION FRAMEWORK

10.1 Introduction

It is a requirement of World Bank OP 4.12 that government should initiate and execute resettlement related to a project before that project is implemented. All forms of compensation are related to physical, social or economic displacement caused by a project. The compensation framework specifies all forms of asset ownership or use rights among the population affected by the project. The categories of impacts include loss of physical assets, revenue and income resulting from economic displacement or physical relocation. Urban resettlement often affects the urban poor disproportionately. The World Bank Involuntary Resettlement Handbook states that displacement of low-income urban squatters or slum communities often provides opportunities for moving beyond narrow mitigation of adverse impacts to promoting community development, security of tenure, and rational land use.

10.2 Eligibility

For purposes of formulating a compensation policy for Resettlement, the census identified the commercial tenure arrangements for traders and other PAPs in the project area. The Resettlement Action Plan has been drawn in accordance to World Bank's O P 4.12 Policy Provisions. Questions were asked about tenancy records to determine duration of residency. Payment of taxes and market registration formed key alternative forms of methods used to determine duration of residency. Payment of taxes to the FCC was instrumental in establishing the duration of registered traders. Vendors who pay license fees are recognized as legitimate renters and will receive assistance to relocate to new venues and to move. Vendors who spread their wares on the streets with established work histories will also be considered for assistance through provision of alternative space for continuing their activities after relocation.

10.3 Physical Assets

Physical assets in the context of market, car wash area and access routes are the structures owned by the traders and other residents as well as housing and shops that are affected by the roads. Those entitled to assistance or compensation for loss of assets include those who have formal legal rights to land or other affected assets and those who do not have such formal legal rights but who have claim to such legal rights by virtue of occupation or use of those assets. Consideration will be given to women whose incomes tend to be lower and less stable than those of men who are not disadvantaged in the process of compensation. Whether physical relocation is required or not, affected people should be given prompt and effective assistance or compensation at full replacement value for loss of assets due to project activities.

10.4 Revenue and Income

Affected persons will participate in planning and implementing resettlement activities as well as to restore and improve their livelihoods. Affected persons will be provided with transitional financial support, site preparation, and training and employment opportunities.

Resettlement will be undertaken as a sustainable development initiative that leads to improved standards of living for the project affected people.

10.5 Types of Compensation Payments

Individual and household compensation will be made in kind and/or in cash. For cash payments, compensation will be calculated in Leones and adjusted for inflation. For compensation in kind, items such as land, houses, other buildings, building materials, seedlings, agricultural inputs and financial credits for equipment may be included. Assistance may include moving allowance, transportation and labour.

Cash payments must allow for inflationary adjustments of compensation values. Security, for people who will be receiving cash compensation payments, will need to be addressed by the Freetown City Council (FCC). For payment of compensation in-kind, the time and new location will have to be decided and agreed upon by each recipient. Bank payments will be preferred, where possible.

10.6 Compensation Calculations for Assets

Compensation for all land used and assets must be made, including for:

- cultivated land and crops;
- residential buildings, structures and fixtures;
- sacred sites;
- trees and crops; and
- loss of businesses or employment.

Principles for Compensation

Households, individuals and communities deemed to be entitled to compensation have been identified. The nature of the entitlement will vary between each individual and households. For the most part the operational entity and unit of entitlement is envisaged as being the household as a whole. Affected households, individuals and communities are entitled to compensation based on agreed values. Different compensation options have to be discussed with all affected parties via the consultative meetings in order to obtain agreement on the adequacy and acceptability of the compensation package. Compensation valuations should focus on the following:

- compensation options in terms of replacement of homesteads, structures and replacement land for physical resettlement where this is necessary;
- options for the relocation of graves and sites of cultural, historical or religious importance; and
- relocation and replacement of any community structures.

Compensation for Cultivated Land and Crops

Compensation relating to land will cover the market price of labour invested in it as well as the market price of the crops lost. Compensation for crops does not however apply to this project.

Land Measurement Unit

It is recommended that land should be measured in meters or any other internationally accepted unit of measurement. In such cases, the unit that is-being used must be explained to the affected persons. Understanding the unit of measurement ensures that the affected person is able to verify his/her own size of land that is being lost. This maintains transparency in the process and avoids subsequent accusations for wrong measurements or miscalculation of land areas. The traditional unit of land measurement in the Western Area of Sierra Leone is the town lot, which measures 50ft x 75ft.

Compensation for Economic Trees

Compensation for fruit trees and other economically valuable trees will be compensated for in the same way as for crops and in accordance with the national law. This does not however apply to this project.

Compensation for Residential Buildings, structures and Fixtures

Compensation will be paid by replacing structures such as huts, houses, outbuildings, latrines and fences. Consideration may be given to rebuilding homes lost on acquired replacement land; however, cash compensation would be available as a preferred option for structures. The going market prices for construction materials will be determined. Alternatively, compensation will be paid in-kind for the replacement cost without depreciation of the structure. The project will survey these prices for administrative purposes on an ongoing basis.

Replacement values will be based on:

- drawings of individual's household and all its related structures and support services;
- average replacement costs of different types of household buildings and structures based on collection of information on the numbers and types of materials used to construct different types of structures (e.g. poles, bricks, rafters, bundles of straw, corrugated iron sheets (CIS), doors, etc.);
- prices of these items collected in different local markets;
- costs for transportation and delivery of these items to acquired/ replacement land or building site; and
- estimates of construction of new buildings including labour required.

Compensation for Sacred sites

Compensation for sacred sites is determined through negotiation with the appropriate parties. Sacred sites include but are not restricted only to altars, initiation centres, ritual sites, tombs, and cemeteries. They include other such sites, places or features that are accepted by practice, tradition and culture as sacred. There were however no sacred sites identified.

Compensation for loss of income from Business or Employment

Compensation for income from businesses (i.e., kiosks and local eating and drinking places) has been estimated based on the daily or monthly income of the affected parties.

10.7 Entitlement Matrix

The project proponent under the law is required to prepare an Entitlement Matrix with respect to the displacement that is expected to occur.

The proposed compensation matrix is presented in the following table.

Category of PAP	Type of loss	Compensation for					Moving allowance	Disturbance Allowance	Entitlement at new relocation site
		Structures	Assets (fixtures)	Land	Income	Crops			
Licensed business person with market table or easily moveable small stall with evidence of market due payments	Loss of shade Loss of business	Cash compensation for full replacement cost of structure if structure belongs to business owner	N/A	N/A	Compensation for 0.5 months loss of business	N/A	Yes	N/A	Guaranteed table space at new market site plus other physical facilities at site
Street traders with no structures with evidence of market due payments	Loss of business	N/A	N/A	N/A	N/A	N/A	Yes	N/A	Priority for table space at new market site plus other physical facilities at site but no guarantees
Member of registered organisation earning living at car wash site-authenticated by organisational head	Loss of business				Compensation			To be negotiated	Entitled to car wash facility to be created at new market
Residential Owner of fixed stall with no land ownership document	Loss of shade	Cash compensation for full replacement cost of building	Cash compensation for any fixed structures	N/A	N/A	N/A	Yes	1 month rental cost of equivalent premises	None but may be considered in Government Housing programmes for the poor

Category of PAP	Type of loss	Compensation for					Moving allowance	Disturbance Allowance	Entitlement at new relocation site
		Structures	Assets (fixtures)	Land	Income	Crops			
Owner of fixed stall and business with no land ownership document	Loss of shade Loss of business	Cash compensation for full replacement cost of building	Cash compensation for any fixed structures	N/A	Compensation for 3 months loss of business income	N/A	Yes	1 month rental cost of equivalent premises	Priority for rental of stall at new market site if conditions can be met but no guarantee
Owner of residential building	Loss of building	Cash compensation for full replacement cost of building or Construction of new building elsewhere for owner if through consultation owner/community agree to the option.	Cash compensation for any fixed structures	Market cost of equivalent piece of land on presentation of valid land ownership document or Equivalent land in another location if new building is not constructed for owner	N/A	Full cost of crops	Yes	3 months rental cost of equivalent premises	
Owner of business building	Loss of building Loss of business	Cash compensation for full replacement	Cash compensation for any fixed structures	Market cost of equivalent piece of land on	Compensation for 3 months loss of business	Full cost of crops if any	Yes	3 months rental cost of equivalent premises	Priority for rental of shop at new market site if conditions can be met but no

Category of PAP	Type of loss	Compensation for					Moving allowance	Disturbance Allowance	Entitlement at new relocation site
		Structures	Assets (fixtures)	Land	Income	Crops			
		cost of building or Construction of new building elsewhere for owner		presentation of valid land ownership document or Equivalent land in another location if new building is not constructed for owner					guarantee
Owner of moveable container	Loss of business	N/A	N/A	N/A	Compensation for 1 months loss of business		Yes	0.5 months rental cost of equivalent premises	Priority for rental of Stall/shop at new market site if conditions can be met but no guarantee
Public infrastructure	Loss of services	Cash compensation for full replacement cost of re-establishing infrastructure	N/A	N/A	N/A	N/A	N/A	N/A	
Facilities with cultural values	Loss of facility	Cash compensation for full	As applicable	Market cost of equivalent	N/A	N/A	Yes	To be negotiated	

Category of PAP	Type of loss	Compensation for					Moving allowance	Disturbance Allowance	Entitlement at new relocation site
		Structures	Assets (fixtures)	Land	Income	Crops			
		replacement cost of facility		piece of land					
Community infrastructure	Loss of building	Cash compensation for full replacement of building	Cash compensation for any fixed structures	Market cost of equivalent piece of land	Compensation for 3 months loss of business	Full cost of crops	Yes	Yes	
Owner of land	Loss of asset	N/A	N/A	Full market cost of land on presentation of valid documents	N/A	Full cost of crops	N/A	N/A	
Vulnerable groups	Inconvenience	N/A	N/A	N/A	N/A	N/A	N/A	Yes	None but may be considered in Government Housing programmes

In case of rental, all categories of properties would be compensated for based on justification in lieu of termination of rental agreement. However, considerations will be made for relocation allowance.

Relocation Entitlement for Vulnerable people

During the relocation exercise, transportation will be available for vulnerable groups and manpower assistance also provided them. They have been factored into the livelihood restoration programme and are also entitled to a special allowance. The quantum of this allowance will take their special needs into consideration. Some of the aspects mentioned in the paragraph following will be used to determine what type of help will be provided.

Women usually need social protection intervention with high wage coupled with gendered work norms and as such, they would be included in micro-finance programmes that will enable them to be recipients and managers of funds. Women, girls, and children would be involved in health and educational programmes as well as awareness raising programmes. The educational programmes would help to raise the knowledge level of women and increase their empowerment within the household and their communities. Skills training programmes would also be beneficial to this particular group of vulnerable. It is also relevant and beneficial to know that the vulnerable women will be involved in issues that reinforce their traditional roles as mothers and careers and also heighten their traditional values; programmes that would lessen their domestic workload and time burden.

Since children are more vulnerable to malnutrition, disease, and abuse and lack a voice in terms of policymaking, they, therefore, have to depend largely on adults for the provision of their basic needs and protection. Consequently, they will be provided with educational facilities, access to health services. Family capacity would be strengthened in order to care for the children within the household. Caregivers would also be given social protection that will empower them to care for the children by providing for their needs. The government would be made to invest in children that would yield diminishing rates of returns the older children get.

The elderly rely on social pensions. It is however unfortunate that there are more men than women in the formal sector. However, giving women access to the land right is a way of reducing the vulnerability in elderly people. Older people or the elderly love caring for their grandchildren and accordingly, the elderly will be provided with child benefits, which will go a long way in helping them as careers whether in cash or kind.

People With Disabilities (PWD) will be given social protection because it is rising on the social protection agenda even though coverage is still low. Mainstreaming programmes would apply to PWDs. In terms of the higher rate of poverty among PWDs, they would be either included in general programmes or be specifically targeted. Educational programmes would be very beneficial to PWDs; in the form of skills training or even formal training depending on the specific need. Availability of funds to PWDs would also be of great assistance and will definitely alleviate the high rate of poverty among PWDs. Above all, PWDs would be captured into awareness raising programmes that would change their perception about themselves and the assumption that they are unable to work.

11.0 RESETTLEMENT ASSISTANCE AND LIVELIHOOD RESTORATION

11.1 Introduction

Resettlement assistance is vital in cases where displacement of persons is inevitable. The proponent plans and executes resettlement as a development initiative that provides displaced persons with opportunities to participate in planning and implementing resettlement activities as well as to restore and improve their livelihoods. This chapter therefore discusses steps that were undertaken to identify resettlement sites and proposes mechanisms for influx management and income restoration in the context of the project.

11.2 Selection and Preparation of the Resettlement Site

To ensure that Project-Affected People are properly compensated, their views were sought on the suitability of the site for relocation taking into consideration advantages and disadvantages of the proposed location. The selected relocation site was explicitly accepted by the traders and the people in the car wash area and was found adequate for all the traders eligible for relocation, with due recourse to the design by the project design team. This was the only area considered as consultations with PAPs had indicated that the only project area acceptable to PAPs was one proximate to their current location.

The resettlement site (Figure 6.1.2) is a few hundred yards on the right of the road towards Lumley beach in a big area called “car wash” where a lot of activities take place including commercial washing of cars and several types of businesses. Some people also use this site for habitation. The site is a reclaimed land of a total area of about 21,036.89 square meters. Part of the site includes a large marshy area. There is an open roadside drain along the proposed access road and an earth channel along the opposite side of the site with a footbridge as pedestrian crossing. Presently, the site is occupied with a few concrete buildings (dwelling houses and shops), shipping containers, car washing bay. A number of economic activities are carried out in the car wash area including welding, vehicle repair/maintenance, petty sales of all types of local food items, car washing and a terminal for “poda-podas”, “okadas”, tricycles (“Kekeh”), taxis and several other vehicle types of both commercial and private types. The car wash boys organise themselves into groups working on a shift basis washing cars. A major feature at the carwash site also is that there are people using the stalls for habitation purposes. Extensive consultations were carried out with various PAPs already residing or carrying out business at this site. The results of these consultations have been well reflected in the section on public consultation. There was willingness on behalf of PAPS for the project to proceed at this site.

The project area is drained by a seasonal stream which originates from the peninsula mountain. This stream empties into the Atlantic Ocean through a floodplain and tidal flats. The drainage system around the project site is not properly constructed and there is frequent flooding exacerbated by scattered structures which obstruct the free flow of excess water. Influx Management.

Influx into the proposed resettlement area may occur. There may be traders who will move into the proposed project area in the hope of getting some “space-for-space” compensation benefits. Ways of dealing with this situation will be by:

- Use of the official cut-off date whereby only those found within the area on or before the date will be eligible for resettlement. The number of traders as at the establishment of the cut-off date shall also be considered first in reallocation of market slots.
- Interviews with the traders will also reveal the long-term ones and the newcomers thus excluding the latter from any undue benefits they might hope for.

The capacity of the new market will be reviewed with the design engineers and the Freetown city council to determine any additional number of traders that may be accommodated. As already indicated in the section on project description and design considerations, work planned at the car wash site includes:

- rehabilitation of existing ground conditions and flood prevention;
- construction of market;
- improvement/rehabilitation of access roads;
- formalising pedestrian footways;
- improving road safety; and
- management of road-space following relocation.

The design of the facility would include:

- water and sanitation facilities as part of the design of the terminal and market;.
- a waste management and treatment plan as part of the sanitation facilities;
- the removal of all the domestic waste and desilting of the material currently clogging the drains behind and adjacent the proposed site to ensure that flooding does not occur during the rainy season.

FCC will be very instrumental in influx management at the new market. They have a database of traders and will be registering traders at the new site and they will be very instrumental in the allocation of trading space. An Influx Management Strategy/Plan will be produced.

11.3 Relocation Schedule and Assistance

A relocation schedule will be prepared with sufficient notices by the Resettlement Implementation team. Relevant bodies will be involved in the exercise. The schedule should be well thought out and matched against the overall project timetable. A relocation allowance has been recommended. The dates and time that the affected traders will be expected to move, should be communicated by the Project Management. Sufficient time allowance will be given between notification and actual movement to enable traders coordinate their movement plans and enlist the help of handymen if required. In determining the time required, the timing of all the activities slated for this period will be taken into consideration.

It is recommended that traders requiring special assistance such as physically challenged traders may be given priority in moving or be allocated a different date to move so as to make the transition safer and easier for them.

11.4 Replacement of Services and Enterprises

All utility facilities and services currently available at the market's sections subject for improvements will be replicated at the new site which will have even more and better facilities. This will include electricity, water and sewerage services.

11.5 Treatment of Cultural Property

There are no cultural properties presently in the market but there is a Mosque at the car wash site. Discussions have been held with relevant PAPs on this issue with a view to adopting an appropriate scheme for reconstruction of the Mosque. The costs of replacing the mosque has been included in the compensation scheme.

11.6 Special Assistance for Women and Vulnerable Groups

There are a considerable number of women and vulnerable groups within the project area. Poor resettlement execution may result in women traders becoming impoverished. Additional assistance will be required for women especially during movement in activities like dismantling their structures and transporting them. Their entitlements also have to be clearly stated to avoid conflicts. Separate days may be set for movement of women and children from those for men. Safety at the site has been a source of concern for women and vulnerable groups. This has been carefully considered in the design, The project area will be fenced and security personnel employed. The services of the Police will also be secured for policing the entire area on a sustained basis, with more resources deployed at night.

11.7 Livelihood Restoration Plan

Introduction

Livelihood restoration is the process to restore income earning capacity, production levels and living standards in a longer term. Once Displaced Persons (DP) have been resettled, attempts will be made to restore all their sources of livelihood. Compensation should ensure that the traders' standard of living is improved or in the least maintained by ensuring that their income streams continue to flow. For each category of impact, there should be adequate measures in place to cushion PAPs against impoverishment. According to World Bank guidelines O.P. 4.12, sufficient investment resources should be provided for this purpose.

This Livelihood Restoration Plan (LRP) has been developed to respond to the following objective:

To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use, including by:

- Providing timely compensation for loss of assets at replacement value

- Assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of Project implementation, whichever is higher.

PAPS will have the opportunity to choose from a variety of options designed to leverage their current activities and skills. Extensive engagement will be undertaken to be sure that all PAPS are well informed of the opportunities open to them and are given adequate opportunity to participate.

Key Principles Guiding Livelihood Restoration Planning

The sustainable approach to livelihood restoration is based on the following principles:

- livelihoods are multi-faceted strategies and a combination of approaches is therefore required to support restoration of income and the reestablishment of community support networks;
- active participation of intended beneficiaries in planning and decision making to ensure proposed support reflects local realities / priorities and have Project Affected Households (PAHs) active buy-in;
- PAHs should be provided with choices so that they can self-determine how their household will best benefit from the livelihood restoration options;
- vulnerable households are by definition less able to adapt to changes and therefore require targeted support through the planning and implementation of livelihood restoration;
- transition allowances are necessary but require clear eligibility and end points;
- capacity building should be incorporated into livelihood restoration activities to develop PAHs skills, including in financial management. Capacity building acknowledges the different needs of women, men, youth and vulnerable groups with respect to skills development.

Process for Determining Livelihood Restoration Options

The livelihood restoration options are based on the information gathered from the socio-economic baseline and engagement with relevant stakeholders. From these activities the following key subjects emerged.

- Livelihood options and roles vary for women, men and youth. This will include specialised training and skills development on Business Development and Management for women and portable skills training for youth.
- Stakeholders view provision of community social services as livelihood options and it forms part of their expectations.

Contents of the LRP

The LRP will have four main elements:

- immediate provision of transitional support;
- financial management training. Non-land-based livelihood support. Different livelihood restoration programmes will be implemented by different implementation agencies. Implementation partners will be required to provide technical assistance, and critically, offer solutions for improved access to markets;

- transitional support will serve as supplementary assistance so that households can meet their basic needs until they recover from their losses and restore their livelihoods to pre-project levels. Transitional support may consist of a “basket of goods” containing various supplies especially food.

All PAHs will be eligible for financial management training. Training topics may include:

- basic numeracy skills;
- money management and basic household budgeting;
- savings and strategic cash management;
- basic literacy;.
- advisory services.

Financial management training will commence before compensation is paid to households. Households will also be linked to micro-credit facilities in the area. This is to encourage savings and enable households to invest in their businesses and restore their livelihoods. It is also recommended that the project does not endeavour to provide the credit but rather refer PAHs with existing rural banks and micro-credit organizations.

Non-land-based livelihood support will provide skills training to support PAHs transitions into alternative livelihoods, or the scaling up of existing non-land-based livelihoods. This type of livelihood support will target

- i) Value addition and processing;
- ii) Technical and vocational training;
- iii) Training on health, hygiene and safety;
- iv) Technical assistance on access to markets.

Support for technical and vocational training will initially focus on the short term, providing training course on technical skills for existing livelihoods and new livelihood options. Existing livelihoods where skills could be upgraded include tailoring, mechanical work, carpentry, masonry, painting etc. Potential new skills based on locally available training expertise will also be identified. In addition to short term technical training, long term technical training may be considered, as this is more likely to lead to employment opportunities. In order to maximise employment of unemployed local people, it is recommended that the project employs locally where workers have the skills required. This means that during Project construction, it is expected that a number of positions with the project will be available. These shorter-term positions will not represent the complete re-establishment of livelihoods to pre- Project levels for those hired but are nonetheless significant opportunities and will be integrated into the LRP.

Vulnerable Groups

Vulnerable groups are defined as those who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status, may be less able to participate fully in processes related to displacement, and are more adversely affected by the impacts of land acquisition. Vulnerability will be considered at a household rather than individual level. It is recommended that vulnerable PAHs be monitored separately to see that their livelihoods are restored to pre- project levels and that they are receiving the transitional support outlined above targeted to meet their basic needs.

Loss of trading area

Alternative relocation areas should be provided with facilities and amenities that will enable traders continue with their normal operations. This has already been done.

Loss of business and wages

- Training of the traders on entrepreneurship
- Supporting traders to organize in “Osusu²” and provide the seed capital.

Special consideration for PAPs

Traders should be allowed to salvage their assets. Care should be taken so as to avoid any damage to movable fragile assets and merchandise. PAPs should be compensated for loss of immovable assets.

11.8 Capacity Building

Market committees will be trained on management of the traders. Also, based on the low literacy level of most of the PAP, it is advisable to capacitate them on basic record keeping of their businesses. The proposed market designs are such that traders will be classified into different categories according to their tools of trade and will no longer trade openly and in anyway as is the current case. The market will also have different floors trading in different commodities. In addition, regular and intermittent traders as well as retail and wholesalers will be accommodated differently. Training of the market committees on management of the traders is necessary to reduce conflicts and restore normalcy in operations. There will also be training on gender equity and inclusion. It will be ensured that market allocations are done equitably.

² Traditional rotational loan scheme

12.0 QUALITY OF INSTITUTIONAL ARRANGEMENT FOR RAP IMPLEMENTATION

The implementation of RAP should be undertaken by people with experience in resettlement and social development. The roles and tasks of individuals are enshrined in the different institutions and organizations responsible for coordinating the exercise. A clear delineation of responsibilities will have to be sought to reduce incidents of conflicting roles and to identify areas that need strengthening. This is to ensure that there are no delays in the implementation of the RAP. An assessment of individual capacities of the agencies must also be carried out to ensure that any gaps are filled. If there is need for capacity building, then it has to be undertaken early so that implementation may be smooth. Budgeting should include any training costs for

The following table outlines the agencies and institutions involved in resettlement activities for the project. MoTA is responsible for compliance with OP 4.12. The PIU will be required to liaise with the various agencies and, if necessary, prepare a formal agreement with the agencies to provide their services in a timely manner as per the project schedule and/or the implementation schedule provided in the RAP documents.

Table 12.1-1 Agencies and Institutions Involved in the Implementation of Involuntary Resettlement

Agency	Involuntary Resettlement Function
MoTA-Technical Working Committee (TWC) for Land Acquisition	Responsible for the site/land acquisition necessary for the IRUM project. Responsible for implementation, management, and obtaining budget allocation from the GoSL for payment for land acquisition and for procuring alternative land for compensation purposes. Review and approve RAP and associated budgets on behalf of the Government.
MoTA	It shall directly manage and supervise the project, including land acquisition and resettlement activities with the direction for the TWC for Land Acquisition. It shall ensure that funds for the timely implementation of the RAP are available and that expenses are properly accounted for.
Project Implementation Unit (PIU)	<p>A PIU will be established to undertake the supervision of the IRUM project. It will be staffed by personnel recruited specifically for this project under the supervision of the MoTA/TIDU. The specific responsibilities of the PIU are, among others:</p> <ul style="list-style-type: none"> Ensure that bidding and contract documents include the ESMP and RAP, when necessary; Submit monthly and semi-annual monitoring reports on ESMP and RP implementation; Ensure that project implementation complies with WB's safeguard; For project duration, commit and retain a Safeguard Specialist to oversee ESMP/RAP implementation;

Agency	Involuntary Resettlement Function
	<p>Check that environmental protection and mitigation measures in the ESMP/RAP are incorporated in the detailed designs;</p> <p>Participate in an environmental grievance redress mechanism, as described in the ESHIA, to receive and facilitate resolution of affected peoples' concerns, complaints, and grievances about the Project's environmental performance;</p> <p>Report to WB and EPA on all aspects of environmental management and monitoring based on the results of ESMP/RP monitoring and take corrective measures where necessary;</p>
The World Bank	Provides the project's source of financing. Provides project appraisal ensuring that social safeguards are complied with during project implementation.
Project Consultant (Resettlement Expert/s) CEMMATS Group and independent Resettlement expert	<p>The need for incessant coordination of activities calls for employing the services of an independent consultancy team to assist with resettlement planning and implementation. In coordination with the PIU, the project Consultancy team comprising a group of experts will have the following functions:</p> <p>Monitor RAP implementation and progress;</p> <p>Supervise the compensation payment process;</p> <p>Assist in redressing grievances concerning RAP activities;</p> <p>Coordinate with concerned government agencies and other ministries.</p>
FCC	To provide assistance to the PIU during public consultation meetings and in identifying resettlement sites for PAPs, when necessary. The FCC will also bear primary responsibility for allocation space to various groups at the resettlement site.
Courts	<p>Issue Right of Demolition to informal settlers (RA 8974 IRR Sec. 17);</p> <p>Issue Right of Possession of expropriated lands (RA 974); and</p> <p>Determine "just compensation" to land/property owners (RA 10752 IRR Sec 14).</p>
MLHE	Provides development permits and regulates private housing developers which includes resettlement areas; also important for land acquisition purposes, and validation of property valuation
Banks	Depository of initial payments for appropriate compensation;

Agency	Involuntary Resettlement Function
Environment protection Agency (EPA)	The EPA has the overall responsibility of approving and monitoring the project's compliance in line the Approval Conditions as well as other standards relating to the social environment including this RAP. It is further empowered to identify projects, plans and policies for which environmental assessment are necessary and ensure that the same is done in line with the provisions of EIA regulations. Its responsibilities include managing the EIA process, making decisions and ensuring that management occurs in accordance with the decision.
Resettlement Working Group (RWG)	<p>The Resettlement Working Group (RWG) will be the primary mechanism for engaging resettlement-affected households and other relevant stakeholders in resettlement planning. The responsibility of RWG will include ensuring that appropriate mechanisms and measures are in place to respond to any specific problems that may be encountered during resettlement. The RWG also ensures the successful implementation of the resettlement plan.</p> <p>This may relate, for example, to the protection of resettling or resident populations or to the resolution of property or other disputes.</p>
Contractor	To ensure that a safeguard specialist is employed to monitor and ensure compliance to relevant terms stated in the contract
Other MDAs e.g. SLRA and SLRSA, SLP	To be called upon to assist with addressing various problems eg traffic
Area Chairperson / Chief / Ward Councilors	These are part of the RWG and an integral part of the implementation of the RAP.
Women / Market Organisation	This existing body is used as the first Tier to deal with all grievances and minor challenges and is an integral part of the RWG responsible for implementation of the RAP. They could also play a key role in determining how to improve conditions for women operators in the new relocation site.

13 MONITORING, REVIEWS AND EVALUATION

13.1 Introduction

Monitoring and evaluation will be a continuous process that will provide the World Bank, MoTA, MoF and other relevant stakeholders with feedback on RAP implementation.

The Monitoring and Evaluation Plan (MEP) will be firmed up when the engineering design is completed. It is suggested that the independent consultancy group assisting with Resettlement Planning and implementation also handles the monitoring and is given the task of preparing a monitoring plan.

13.2 Internal and external monitoring

The monitoring should be a systematic evaluation of the activities of the operation in relation to the specified criteria of the condition of approval. It will consist of both internal and external monitoring.

The objective of internal monitoring and supervision will be:

- to verify that the valuation of assets lost or damaged, and the provision of compensation, resettlement and other rehabilitation entitlements, has been carried out in accordance with the resettlement policies provided by the Government of Sierra Leone (GOSL) and the World Bank;
- to oversee that the RAP is implemented as designed and approved; and
- to verify that funds for implementation of the RAP are provided by the project authorities in a timely manner and in amounts sufficient for their purposes, and that such funds are used in accordance with the provisions of the RAP.

The main internal indicators that will be monitored regularly:

- that the entitlements are in accordance with the approved policy and that the assessment of compensation is carried out in accordance with agreed procedures;
- payment of compensation to the PAPs (where possible) in the various categories is made in accordance with the level of compensation described in the RAP;
- public information and public consultation and grievance procedures are followed as described in the RAP;
- relocation is done in a timely manner; and
- restoration of affected public facilities and infrastructure are completed prior to construction.

An additional socio-economic assessment of PAPs will be undertaken once they have been resettled into the new sites. The purpose of socio-economic assessment, which is part of the evaluation process, is to ensure that PAPs livelihood and wellbeing have improved and have not worsened as a result of the subproject. An assessment will be undertaken on payment of compensation, restoration of income and livelihoods, and provision of sufficient community development activities. Monitoring of living standards will continue after resettlement. It is suggested that the resettlement consultant handles the internal monitoring.

It is also suggested that periodic external monitoring is carried out by a designated NGO. The External monitoring group will monitor the resettlement and compensation process and implementation of requirements to verify that compensation, resettlement and rehabilitation have been implemented in accordance with the agreed RAP provisions. It will also be involved in the complaints and grievance procedures to ensure concerns raised by PAPs are addressed.

More specifically, the NGO will be responsible to carry out the following:

- review the results of the internal monitoring and review overall compliance with the RAP;
- assess whether relocation objectives are being met;
- assess general efficiency of relocation and formulate lessons for future guidance; and
- determine overall adequacy of entitlements to meet the set objectives.

13.3 Main indicators monitored

The main indicators that the MEP will measure include: (i) impacts of affected individuals, households and communities to be maintained at their pre-project standard of living, and better; (ii) identify problems and successes as early as possible to allow timely adjustment of implementation arrangements; (iii) improvement of communities affected by the project. In order to measure these impacts, the RAP will identify the specific indicators to be monitored; define how they will be measured on a regular basis; and identify key monitoring milestones.

Some specific indicators include:

- physical progress of resettlement and rehabilitation activities;
- number of informed and consulted PAPs about the entitlements-this will be disaggregated by gender;
- the effectiveness of public consultation and participation activities,
- the disbursement of compensation,
- number of agreements signed with PAPs;
- number of complaints;
- number of households and individuals physically or economically displaced by each sub-project;
- timing of compensation in relation to commencement of physical works;
- amount of compensation paid to each PAP household (if in cash), or
- number of PAPs affected (building, land, trees, crops etc.);
- changes in PAPs income and livelihood conditions-this will be disaggregated by gender;
- quality of grievances or disputes resolved (qualitative); and
- number of cases settled by GRC.

Monthly and quarterly progress reports will be prepared and a final report will be prepared at the conclusion of the resettlement process.

13.4 Methods for measuring impacts

The following methods will be used for measuring impacts:

- questionnaire with data stored in a database for comparative analysis (before-after and with-without);
- documentation and recording of PAPs situation, including subsequent uses of assets/improvements;
- relocation /resettlement and Compensation Reports;
- regular and well organised Consultations; and
- financial records will be maintained by the sub-projects and the PIU, to determine the final cost of RAP implementation. The indicators listed above can be used to monitor implementation of the RAP.

13.5 Annual Audit

The annual audit of resettlement implementation, and as applicable RAP implementation in subproject(s), includes: (i) a summary of RAP performance of each subproject; (ii) a compliance review for RAP implementation process; and (iii) a progress report on the quality of RAP implementation in terms of application of guidelines as provided in this RPF.

14.0 GRIEVANCE REDRESS MECHANISM

14.1 Introduction

During the implementation of the project activities it is likely that disputes/disagreements between the project implementers and the affected persons will occur especially in terms of the use of land/properties, compensation values, and delay in reimbursement of compensation packages.

Grievance mechanism is a management system through which grievances will be resolved following a standard operating procedure (SOP) aligned to other management systems (communication, resourcing, reporting). A grievance mechanism provides a way to reduce risk for the project and offers communities an effective avenue for expressing concerns and achieving remedies, and promotes a mutually constructive relationship. A well-functioning grievance mechanism:

- provides a predictable, transparent, and credible process to all parties, resulting in outcomes that are seen as fair, effective, and lasting;
- builds trust as an integral component of broader community relations activities; and
- enables more systematic identification of emerging issues and trends, facilitating corrective action and preemptive engagement.

Within this project the following principles need to be established to ensure the effectiveness of the GM:

- commitment to fairness in both process and outcomes;
- dedication to building broad internal support across project lines;
- mainstreaming responsibility for addressing grievances throughout the project;
- willingness of the leadership of the project team to visibly and sincerely champion the grievance system.

A grievance redress mechanism is necessary for addressing the legitimate concerns of the PAPs. It is anticipated that these concerns will focus mainly on eligibility criteria, and compensation entitlements for loss of livelihood or use of land. The mechanism for grievance redress shall thus include:

- provision for the establishment of a grievance redress committee that includes women;
- a reporting and recording system;
- procedure for assessment of the grievance;
- a time frame for responding to the grievances filed;
- the mechanisms for adjudicating grievances and appealing judgments.

In the interest of all parties concerned, the grievance redress mechanisms are designed with the objective of solving disputes at the earliest possible time. World Bank OP. 4.12 emphasizes that the PAPs should be heard and as such, they must be fairly and fully represented. Further, the mechanism should implicitly discourage referring matters to the court system for resolution.

The implementation process outlines the process for registering and addressing grievances and provides specific information regarding registering complaints, response time, and communication mode.

14.2 Implementation Process

The Grievance Redress Mechanism will follow the procedure shown in the following diagram

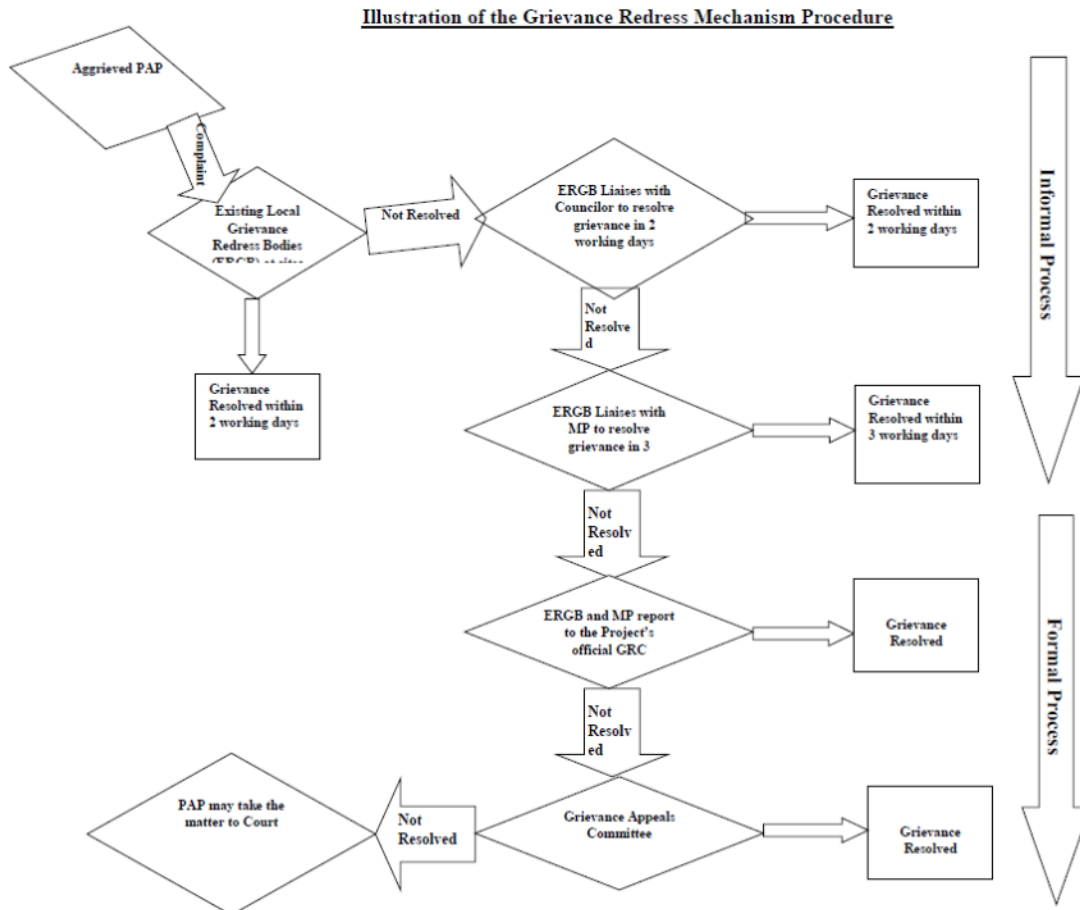


Figure 14.2-1: Grievance Redress Mechanism Procedure

Establishment of a Grievance Redress Committee (GRC)

Procedure

Most of the issues or complaints can be handled/resolved at the local level. The PAP must first report the grievance to existing grievance bodies at the market and car wash who will try to resolve the issue. If however the grievance is not resolved within 2 working days, the grievance body will liaise with the Local Government Councillor in order to resolve the grievance. If the grievance is still not resolved after 2 working days, then the grievance can be reported to the Hon. Member of Parliament for the particular constituency, who will address most of the grievances but if any grievance is not resolved after 3 working days, then the Grievance should be reported to official grievance body.

An official Grievance Redress Committee is usually established in cases of resettlement. In the absence of a specific legislative requirement for establishing an independent grievance mechanism, a project specific grievance mechanism should be established which should be appropriate and transparent to promptly and effectively receive and address specific concerns about compensation and relocation that are raised by PAPs for the whole period of project implementation. .

An official GRC has been established for the project. Members of the Resettlement Working Group will also constitute the core of the GRC. In addition to these the following will also be incorporated:

- Member of a recognized community-based organization
- Representative from the Ministry of Lands and country planning
- Representative from the Ministry of Works and public assets
- A Quantity Surveyor/valuer

Reporting, recording, and Transmission of Grievances.

Procedure

- Grievances must be filed with the GRWC, through the PIU unit, located at the Ministry of Transport and Aviation, Youyi building CEMMATS or to another determined location;
- Grievances may be made in writing and be signed and dated by the PAP where possible. Where not possible, they can be made verbally;
- Grievances received verbally must be documented, verified and signed or thumbprint by the PAP and the officer receiving the report;
- The Grievance Officer shall establish a grievance log or register; all reports must be recorded in the log;
- The grievance log shall outline the reason for the complaint. Arrangements will also be made for the filing of anonymous complaints;
- The Grievance Officer shall submit the grievance reports to the chairperson of the GRC within 24 hours of receipt. The report shall also be copied to the Project Implementation Unit;

Assessment of the Grievance and Timeframe for Response/ Mechanisms for Adjudicating Grievances and Appealing Judgments

- The next assessment of the grievance shall be conducted by the GRC;
- The nature of the grievance would ascertain the period (not exceeding 3 working days) necessary for the GRC to address the grievance.
- The 3-day timeframe shall not apply in the case of complaints and grievances that specifically pertain to the valuation of affected assets, since these may be determined by a Committee of Assessment.
- Where resolution is not reached at the level of the GRC or if the PAP does not receive a response or is not satisfied with the outcome within the agreed time he/she can appeal to the Grievance Appeals Committee which comprises members of the Project Steering Committee (with additional members incorporated).

- If the PAP is not satisfied with the decision of the GRC or the response to the appeal to the Grievance Appeal Committee, he/she as a last resort may submit the complaint to a court of law.
- The PAP shall be exempt from all administrative and legal fees incurred pursuant to the grievance redress procedures.

For each subproject a grievance redress mechanism will be available to allow project-affected persons to appeal any disagreeable decisions, submit complaints about decisions, actions, practices and activities related to compensation for land and other assets, and technical and general project-related disputes. The affected persons will be made fully aware of their rights and the complaint procedures for doing so verbally and in writing during consultation, survey and issue of compensation. But, in order to prevent delays due to long and formal procedures related to submission of complaints and compensation of damage, we shall try initially to avoid these complaints. This will be achieved by full openness in development and implementation of the RAP (as needed) and by involvement of project-affected persons in these processes.

The PAPs shall receive complete information related to their rights and complaint procedures for the purpose of enabling them to submit their complaints, orally or in writing, during the period of consultations, interviewing and issue of compensation. However, MoTA should try to avoid these complaints. This will be achieved through the implementation of the RAP and total involvement of PAPs in the process.

There is no ideal model or one-size-fits-all approach to grievance resolution. The best solutions to conflicts are generally achieved through localized mechanisms that take account of the specific issues, cultural context, and project conditions and scale. In its simplest form, a grievance mechanism that will be used in case PAPs can be broken down into the following primary components:

- a simple template will be available at the premises of affected communities. A Grievance Resolution Form will have a Grievance log that will be kept by the project implementers indicating the date the complaint was lodged, actions to be taken and personnel or team responsible for the complaint;
- a local community liaison person or vulnerable group liaison will be appointed and he/she will keep constant contact with the PAPs. They could address their grievances directly to the liaison person;
- the TIDU assigned officers for each sub-project will monitor and document the progress of all complaints through weekly reporting and subsequently TIDU presents monthly grievances address reports by PAPs to the Steering Committee.
- learn from the experience and communicate back to all parties involved.

In order to mitigate the possible disputes and conflicts during the RAP implementation process a Grievance Redress Committee (GRC) will be established by TIDU for specific sectors. If considered necessary, the GRCs will be established at the community level with 7 members comprising of:

- Social safeguard officers – contact person;
- Local authorities (FCC);

- Representative of affected persons;
- Representative of civil works contractor;
- Consultants.

This will ensure that subproject implementers are able to provide sufficient and timely information to communities; conduct meaningful community consultations involving all stakeholders and build the capacity of project staff, particularly in community facilitations and other field-related issues.

15.RAP IMPLEMENTATION BUDGET AND SCHEDULE

This section presents the RAP implementation budget and schedule.

15.0Preliminary Budget Showing Entitlements

Resettlement costs will cover project implementation, replacement of services at the relocation site, compensation and movement assistance, restoration of livelihood sources, grievance redress, monitoring and any other additional costs that may be encountered in the relocation process. A detailed budget is provided to cater for all relocation-related activities. The estimated budget includes costs associated with setting up and maintaining a Grievance Redress Mechanism and carrying out Monitoring and Evaluation. The costs are indicated in the following table. The basis for the calculation of these compensation costs and allowances can be found in the appendices volume of this RAP report.

Category of PAP	Type of loss	Compensation for loss of structures (Le)	Compensation for loss of assets (fixtures) (Le)	Compensation for loss of land (Le)	Compensation for loss on income (Le)	Compensation for loss of crops (Le)	Moving allowance (Le)	Special payment (Le)	Entitlement at new relocation site
Licensed business person with market table or easily moveable small stall with evidence of market due payments	Loss of shade Loss of business	110,497,500	N/A	N/A	171,500,000	N/A	85,750,000	N/A	Guaranteed table space at new site plus other physical facilities at site
Street traders with no structures with evidence of market due payments	Loss of business	N/A	N/A	N/A	N/A	N/A	125,000,000	N/A	Priority for table space at new market site plus other physical facilities at site but no guarantees
Member of registered organisation earning living at car wash site-authenticated by organisational head	Loss of business	N/A	N/A	N/A	150,000,000		N/A	75,000,000	Entitled to car wash facility to be created at new market
Residential/business Owner of fixed Stall with no valid land ownership	Loss of shade	2,281,005,000	N/A	N/A	407,500,000		85,750,000	56,250,000	
Owner of residential building	Loss of building	2,921,247,000	N/A	1,058,400,000	N/A	N/A	Makeshift. 8,000,000.	Makeshift 4,800,000 Concrete 48,000,000	

Category of PAP	Type of loss	Compensation for loss of structures (Le)	Compensation for loss of assets (fixtures) (Le)	Compensation for loss of land (Le)	Compensation for loss on income (Le)	Compensation for loss of crops (Le)	Moving allowance (Le)	Special payment (Le)	Entitlement at new relocation site
							Concrete building. 40,000,000		
Owner of business building	Loss of building Loss of business	260,622,000	N/A	30,240,000,000	Makeshift Structure Business 30,000,000 Concrete Structure 60,000,000	N/A	Makeshift Structure 50,000,000 Big Business 12,000,000	Makeshift.. 6000,000 Big building. 24,000,000	Priority for rental of shop at new market site if conditions can be met but no guarantee
Owner Sandcrete Fences	Loss of sandcrete fence	222,038,000	N/A	720,720,000	N/A	N/A	N/A	N/A	N/A
Owner of moveable container	Loss of business	N/A	N/A	N/A	32,000,000		96,000,000	8,000,000	Priority for rental of Stall/shop at new market site if conditions can be met but no guarantee
Public infrastructure	Loss of services	Cash compensation for full replacement cost of re-	N/A	N/A	N/A	N/A	N/A	N/A	

Category of PAP	Type of loss	Compensation for loss of structures (Le)	Compensation for loss of assets (fixtures) (Le)	Compensation for loss of land (Le)	Compensation for loss on income (Le)	Compensation for loss of crops (Le)	Moving allowance (Le)	Special payment (Le)	Entitlement at new relocation site
		establishing infrastructure							
Facilities with cultural values	Loss of facility	Cash compensation for full replacement cost of facility	As applicable	Market cost of equivalent piece of land	N/A	N/A	Yes	Mosque 50,000,000	
Community infrastructure	Loss of building	Cash compensation for full replacement cost of building	Cash compensation for any fixed structures	Market cost of equivalent piece of land	Compensation for 3 months loss of business	Full cost of crops	Yes	Yes	
Owner of land	Loss of asset	N/A	N/A	Full market cost of land on presentation of valid documents	N/A	Full cost of crops	N/A	N/A	
Vulnerable groups	Inconvenience	N/A	N/A	N/A	N/A	N/A	N/A	100,000,000	None but may be Considered in Government Housing programmes
Grand Total (Le)		5,795,409,500		4,083,120,720	849,000 000		503,500,000	372,050,000	11,603.080
USD		689,929		486,085.80	101,071		59,940	44,291	1,381,316

15.1 Implementation Schedule

An expanded Resettlement Working Group with representatives from all relevant stakeholders will assist with project implementation. Within the committee, sub-committees may be formed to focus on various aspects of resettlement such as resettlement sites and space allocation, capacity building, income restoration and grievance redress. Proper implementation hinges on a detailed RAP budget that carefully estimates all costs associated with the RAP exercise, including social costs.

For each sub-project, the resettlement schedules will be coordinated with construction schedules. Before any project civil works activity is implemented, PAPs will have to be compensated in accordance with national laws and World Bank resettlement laws, regulations and guidelines as set in the RPF. In other words, no individual or affected household should be displaced due to civil works activity before compensation is paid and resettlement sites with adequate facilities are prepared and provided for to the individual affected.

The land acquisition (for both construction and relocation) and demolition of houses should be completed within the preparatory stage of the engineering construction and before the beginning of the relevant engineering works. The schedule is expected to ensure that all PAPs, prior to their physical relocation will:

- have been adequately consulted about the project, its impacts and compensation entitlements;
- have received compensation entitlements in a timely manner;
- have been provided with means to establishing livelihoods.

The following table lists down components of the implementation schedule. It is assumed that project preparation including completion of design and procuring the services of a contractor will be completed within the next six months. It is projected construction will last for 24 months. For the purpose of this schedule, it is assumed Month 1 starts now. There will be a long period of some 30 months before the market site/terminals are available for the movement of PAPs. Meanwhile it must be ensured that no new structures are constructed in the project area. PPS have already been consulted on this issue and they are in agreement with this assertion. The services of the Police and the Ministry of Lands, Country Planning and the Environment will be enlisted to ensure that this is the case.

Table 15.1-1: Implementation Schedule

Task	Responsibility	Time Frame Ongoing		
		Start date	End date	Duration (months)
Periodic meetings of RWG and ensure structures are not constructed after cut-off date	TIDU/Consultant	Month 1	Month 30	12
Payment of compensation to PAPs at car wash site and access roads		Month 4	Month 5	2

Task	Responsibility	Time Frame Ongoing		
		Start date	End date	Duration (months)
Evacuation of PAPs from car wash site		Month 5	Month 6	2
Construction work at car wash site and access roads		Month 7	Month 30	24
Training and Capacity building needs for PAPS at car wash site	TIDU/Consultant	Month 4	Month 5	2
Compensation payment to PAPs at market site		Month 29	Month 30	1
Movement of PAPS in Lumley Market to new facilities at car wash site		Month 31	Month 31	0.5
Training and Capacity building needs for PAPS at Lumley market		Month 25	Month 30	5
Monitoring and Evaluation of RAP		Month 3	Month 32	29
Independent NGP monitoring		Month 28	Month 31	3

The total cost of the RAP is estimated in the following tables.

Table 15.2-2 gives a breakdown of costs per RAP component, including compensation and allowances, and costs for various related programmes/aspects.

Table 15.2-3 gives a breakdown of costs per area affected by resettlement.

Table 15.1-2: Final Compensation Costs

Cost Category	Cost (Le)	Cost (\$)
Compensation and Allowances		
Compensation for loss of structures	4,170,540,000	496,493
Compensation for loss of assets (fixtures)	0	0
Compensation for loss of land	742,197,456	88,357
Estimated cost of Garage within option 3*	798,000,000	95,000
Compensation for loss on income	613,500,000	73,036
Compensation for loss of crops	0	0

Cost Category	Cost (Le)	Cost (\$)
Moving allowance	286,750,000	34,137
Special payment	245,900,000	29,274
Subtotal	6,856,887,456	816,297
Restoration of public utilities		75,000
New taxi park to replace park at Congo cross		150,000
Rehabilitation of Peace Market, Ferry Junction		100,000
Livelihood restoration programmes		200,000
Independent consultancy for resettlement management		200,000
Administrative and planning costs		40,000
External monitoring of resettlement		30,000
Annual Audit		
Capacity building, resettlement committees and relocation assistance		75,000
Subtotal		870,000
Total		1,686,297
Contingencies		168,630
Grand total		1,854,927

*See note number 2

Table 15.1-3: Compensation Costs per Area

Cost Category	Cost (Le)	Cost (\$)
COMPENSATION AND ALLOWANCES		
Car Wash	3,606,650,000	429,363.10
Existing Market	369,800,000	44,023.81
Access Road (Option 3)	1,912,437,456	227,671.13
Compensation for garage on access road*	798,000,000	95,000.00*
Congo Cross Car Park	1,290,996,000	153,690
Ferry Junction	979,003,200	116,548

Cost Category	Cost (Le)	Cost (\$)
Subtotal	8,956,886,656	1,066,296.04

*see note number 2

The following should be noted in relation to the costs:

1. Only the access road option three has been taken into account in this budget (options 1, 2 and 4 are not included). The latest version of this option now by-passes 2 major structures which were included in the original assessment; the related costs have subsequently been knocked off.
2. Access road option 3 passes partially through a garage at Lumley, for which permission was not granted (by the owner) to assess. As such an estimated cost of USD 95,000 has been included as compensation for the land.
3. We have also costed for a new Taxi park at Congo cross as we have assumed this land needs to be purchased.
4. We have estimated the cost of replacing public utilities.

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17. APPENDICES

17.1 Terms of Reference

1.0 Background

The Government of Sierra Leone through the Ministry of Transport and Aviation (MoTA) has received IBRD/IDA/World Bank credit facility to be used for implementation of the Freetown Integrated Urban Transport Project (FIUTP). Urban mobility issues in Freetown are a result of the difficult economic and political environment, the inability to keep pace with the growing demand, and decades of neglect. It will take many years to address the underlying problems in a sustained manner. The way forward will focus on testing and scaling up pilot solutions and building capacity to ensure the sustainability of results. Following this logic, the objective of this proposed multiphase programmatic urban transport project is two-fold: first, to pilot short-term remedies in order to obtain immediate relief and demonstrate the value of good management of existing infrastructure, efficient implementation, and good coordination across multiple departments and agencies within the government; and second, to build institutions, develop appropriate policies and regulations, and identify arrangements to strengthen the delivery of public transport services and climate resilience. The project will finance studies and training to strengthen the capacity of government agencies and departments and support the development of laws, regulations and frameworks for the sustainable delivery of urban transport services. It is expected that the lessons from the project will enable the government to incrementally scale up interventions to a wider area over time.

2.0 The Project Development Objective (PDO) is to improve mobility and safety in a pilot area and enhance institutional capacity to plan and manage urban transport in the city of Freetown. The project will have three components: (i) Comprehensive Corridor Improvements; (ii) Institutional Capacity Building and Studies; and (iii) Ferry Terminal and Service Improvements.

The proposed urban transport project will consist of several sub-projects whose specific locations and sub-activities have been defined in a study of alternatives of urban transport interventions.

An existing Environmental and Social Management Framework (ESMF) provide guideline for screening project activities and for further assessment and preparation of the Full ESHIA. The ESMF will also guide the determination, preparation and implementation of the Environmental and Social Management Plan (ESMP) to address specific impacts that may arise during project execution.

The project interventions will take place within Freetown, in particular around Juba road in Lumley area. The project will comprise a package of integrated interventions which will showcase the improvements which could be achieved with small investments and improvement of the current infrastructure and traffic management. The interventions will include: (i) provision of new public transport terminal at Lumley, offering facilities for *poda-podas*, *okada's* and tricycles; (ii) improvement of pedestrian facilities in Juba road; (iii) improvement of road condition in Juba road; and (iv) construction of market facilities.

Juba road consists of a highway cross-section of 20.5m, with bi-directional traffic lanes each measuring 3.5m in each direction. Parking and informal pedestrian channel are present on both sides of the street. Informal market trading area measuring 3.5m in each direction. The current configuration and operation of the highway has resulted in the footway and one traffic lane being commandeered by informal market traders and parking, which in due course has resulted in road safety issues, especially for pedestrians.

The new public transport terminal is located in Beach Road Car Wash site. The Car Wash location is currently being used primarily for storing and washing vehicles, mainly cars, poda podas, and passenger buses. This unpaved lot does not drain well and a large pool of standing water is present. A stream passes through the site's north side. The site has access to Beach Road via an apron but it is not clear if the site has direct access to Wilkinson Road. The proposed intervention would include paving the lot and constructing a permanent transit loading and parking area and a permanent market building and improving drainage.

The Government of Sierra Leone through the Implementing Agency of the Project; the Ministry of Transport and Aviation requires the services of a consultant to undertake Environmental Safety and Health Impacts Assessment (ESHIA) and Resettlement Action Plan (RAP). These two instruments are required to be prepared in accordance with national laws and the world Bank's policies on Environment and Social, as set out in the respective Environmental and Social Management Framework (ESMF) and the Resettlement Policy Framework (RPF).

3.0 Scope of Work

- Environmental Safety Health Impact Assessment (ESHIA) As part of this assignment, the Consultant will (i) conduct initial assessment/screening to identify and characterize project impacts, (ii) initiate consultations with PAPs and other relevant stakeholders based on results of the initial assessment/screening, (iii) prepare environmental, social and health impact assessment (iv) propose mitigation measures for the negative impacts and (v) propose an Environmental and Social Management Plan (ESMP) which is materially consistent with the Sierra Leone EPA laws and regulations and the World Bank's operational policies. The ESMP should be adaptable and incorporated into the contractors bidding documents as a contractor ESMP with clear responsibilities for the implementation of identified aspects.

- Resettlement Action Plan (RAP)

The Consultant will also prepare the Resettlement Action Plan (RAP) in line with the principles, procedures and processes outlined in the RPF using the most recent and accurate information on the: (i) proposed resettlement and its impacts on displaced persons and other adversely affected groups; and (ii) legal issues affecting resettlement. The RAP will cover elements that are specific to the selected locations in the project context.

4.0 Key Tasks

4.1 ESHIA: At the minimum, the ESHIA shall include detail identification and description of the following:

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- i. Executive summary
 - ii. *Project Background*: An overview and general description of the project components and affected areas. The section will also explain the rationale for the ESHIA.
 - iii. *Objectives of the ESHIA*: The main objectives of the environmental, social and health impact assessment, is to identify the nature and scale of impacts anticipated through the project.
 - iv. *Description of project environment and Potential Impacts*: Identification of the: (i) components or activities that may extend environmental, social and Health impacts, including GBV related impacts during project implementation; (ii) Description of Existing Environmental and Social Conditions ;The Consultant will review, evaluate and present baseline data³ on the relevant environmental, social, economic and physical cultural heritage characteristics within the project area taking into account the activities at specific project locations. Specifically, the baseline conditions should include information on:
 - a. Physical environment: geology, topography, sediments/soils, surface and ground water hydrology, land pollution, water quality, air quality and sources of air emissions, noise emissions, integration of the river in an overall urban environment (e.g., the sewage network and wastewater treatment plant, climate change aspects such as GHG emission);
 - b. Meteorology: wind patterns, monthly average temperatures, rainfall, snowfall and runoff characteristics; extreme storm and precipitation events;
 - c. Biological environment: existing terrestrial and river flora and fauna at the site; particular rare and endangered species; sensitive habitats, including wetlands, parks or reserves in areas likely to be affected by works; species of commercial importance;
 - d. Social, economic impacts: community structure including gender dimensions and vulnerability; inventory of community activities and production systems (e.g., fishing, industry, farming, small businesses); level of income, any public infrastructure and social services (goods and services); and a description of any direct, indirect and induced impacts on livelihoods;). Information on social and economic impacts should be disaggregated by sex.

³ Baseline information on GBV should NOT be understood as primary data collection from survivors or communities. The assessment shall be derived from secondary review and information from key stakeholders: NGOs. CBOs, governmental agencies, bilateral donors and under multilateral organizations.

- e. Information on disadvantaged groups or persons for whom special provisions may have to be made, if affected, and in the context of developing mitigation measures;
- f. Assess whether there will be any displacements (permanent or temporary) as a result of the physical works;
- g. Assessment of GBV related risk factors. An assessment will be conducted taking into account GBV context related risks and project related. A worksheet for analysis will be provided.
- g. Physical cultural property: Cultural heritage assets such as cultural, religious, historical or archaeological sites, including sacred sites, graveyards and burial places that might be affected during construction. (include a chance find procedure if only this is not in the ESMF)
- h. Other data as may be required by the existing environmental protection laws, regulations and standards by SL EPA
- i. *Legal Framework*: Describe the policy, legal and institutional framework in Sierra Leone governing environmental and social impact issues, including that on GBV, child marriage, child labor and violence against children. This section will include regulatory framework, national and international guidelines including World Bank guidelines (including the sector specific health and safety guidelines relevant to the project), international conventions and regulations relating to the assessment
- ii. *Description of project alternatives*: Describe possible alternative scenarios relating each to the need of the project.
- iii. *Potential impacts and Benefits enhancement and mitigation measures*: This should describe the beneficial/positive impacts, adverse impacts and mitigation measures, impacts on communities/PAPs and cumulative impact assessment. An assessment of the impact of greenhouse gas emission arising from the project especially the transport operation is to be done. The quantity of GHG emission for the duration of the project is to be estimated.
- iv. *Environmental management and monitoring program*: The environmental and social management plan should describe the range of environmental issues associated with the project and outline corresponding management strategies to be adopted to mitigate potential adverse environmental effects. Describe environmental management, monitoring and monitoring framework.
- v. *Public consultations and disclosure plan*: Consistent with the World Bank's policy on consultation and disclosure, describe a strategy for consultation with, and participation of PAPs, communities and project interests including the proposed project and its potential impacts identification and summary of consultations. This section should also describe the methods used throughout consultations and disclosure and major findings of consultations. The strategy should describe activities to make sure the consultations reach out equally to women, men and groups in a situation of vulnerability, including people with disabilities.
- vi. *Environmental mitigation, management, monitoring and training costs*:

The Consultant shall identify significant positive and negative impacts, direct, indirect and cumulative impacts, and immediate and long-term impacts related to the construction phase of the proposed works as well as once the works are finalized (operational phase). For this task, the Consultant will review the environmental and social aspects presented in the background technical documents and will generate the overall updated environmental and social impacts, specifically related to all infrastructure investments in line with the proposed detailed design.

- a. Impacts during construction phase may focus on: impacts caused by dredging; disturbance of river ecosystem; impacts of possible river banks activities; contamination of surface and groundwater by use of fuels, construction materials, and transport activity; soil contamination; waste storage; noise and air emissions; worker's health and safety, gender based violence, including sexual exploitation and abuse and violence against children..
- b. Impacts during the operation phase may include analysis on: impact of discharges; impact of accidental oil and chemical spills; impact of traffic activity; impact of air emissions; impact of run-off of open storages; impact of transport of various goods and solid waste management.
- c. Impacts on public and private structures around the project area; including impacts on the running of daily business, jobs, agricultural and fishing activities; impacts on the flow and exchange of goods and services that may cause direct, indirect and induced impacts on the livelihoods of those living around the construction area).
- d. Impacts on physical cultural heritage, religious and burial sites for which mitigation measures need to be developed.

The Consultant shall propose mitigation measures and affiliated costs for each of the above identified impacts that will represent the content/summary of an Environmental and Social Mitigation Plan for the overall project during its construction as well as the operation phases. The Mitigation Plan is part of the overall project Environmental and Social Management Plan. Costs for implementing the environmental mitigation, management and training costs should be described in details in this section.

- v. *ESHIA implementation responsibilities*: indicate the responsibilities assigned to various agencies. These responsibilities should cover (i) role of the contractor and delivery of contractors ESHIA; (ii) appropriate coordination between agencies and jurisdictions involved in ESHIA implementation; and (iii) capacity building measures that are necessary to strengthen the capacities of project officials to manage overall safeguards issues related to the project.
- vi. *Implementation Schedule*: an implementation schedule covering all ESHIA activities from preparation, implementation, and monitoring and evaluation. These should indicate the target dates for delivery of activities. The schedule should indicate how the ESHIA relates to the implementation of the overall works.
- vii. *Costs and budget*: provide detailed (itemized) cost estimates for all ESHIA activities. The budget should include the implementation of the proposed ESMP. This section will also include sources of funds, arrangements for timely flow of funds, and fiduciary considerations that are consistent with

the Sierra Leone's financial management and World Bank fiduciary requirements.

4.2 The RAP

The following sections of the RAP correspond to the scope of work to be completed by the Consultant. The studies will include but not limited to:

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- To undertake stakeholder consultation of all project affected persons and communities, making sure that both women and men are consulted, as well as people with disabilities
 - Outline means or ways by which grievances can be addressed
 - Conduct a census of all project affected persons and communities
 - Develop eligibility criteria for resettlement/compensation in close collaboration with the Project Affected People
 - Undertake an inventory of properties affected and an assessment of the affected assets and establish compensation entitlement matrix based on the findings of the census.
 - Develop a Grievance Redress Mechanism which incorporates existing local practices and the proposed structure outlined in the RPF.
 - Develop a form for recording complaints and attach this as annex to the RAP
 - Prepare a comprehensive RAP report taking into account the national laws and the standards and requirements of the World Bank safeguards policies (OP4.12).
 - Develop and enter a GIS linked database of affected assets, affected PAPs, asset valuations, records of complaints and other data

The RAP report is expected to cover the following sections:

General Description of the Affected Areas

Potential Impacts: Identification of the: (i) components or activities that require resettlement or restriction of access; (ii) zone of impact of components or activities; (iii) alternatives considered to avoid or minimize resettlement or restricted access; and (iv) mechanisms established to minimize resettlement, displacement, and restricted access, to the extent possible, during project implementation.

Objectives: The main objectives of the resettlement program as these apply to the Freetown Integrated Urban Transport Project (FIUTP) should be described in relation to the FIUTP.

Socio-economic studies: The findings of socio-economic studies to be conducted with the involvement of potentially affected people will be needed. These generally include the results of a census of the PAPs covering:

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- (i) Current occupants of the affected area as a basis for design of the RAP and to clearly set a cut-off date, the purpose of which is to exclude subsequent inflows of people from eligibility for compensation and resettlement assistance;

- (ii) Standard characteristics of displaced households, including a description of production systems, labor, and household organization; and baseline information on livelihoods (including, as relevant, production levels and income derived from both formal and informal economic activities) and standards of living (including health status) of the displaced population, disaggregated by sex;
- (iii) Magnitude of the expected loss, total or partial, of assets, and the extent of displacement, physical or economic;
- (iv) Information on vulnerable groups or persons, for whom special provisions may have to be made; and
- (v) Provisions to update information on the displaced people's livelihoods and standards of living at regular intervals so that the latest information is available at the time of their displacement, and to measure impacts (or changes) in their livelihood and living conditions.

There may be other studies that the RAP can draw upon, such as those describing the following, as needed:

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- (i) Land tenure, property, and transfer systems, including an inventory of common property natural resources from which people derive their livelihoods and sustenance, non-title-based usufruct systems (including fishing, grazing, or use of forest areas) governed by local recognized land allocation mechanisms, and any issues raised by different tenure systems in the sub project area;
 - (ii) Patterns of social interaction in the affected communities, including social support systems, and how they will be affected by the sub-project;
 - (iii) Public infrastructure and social services that will be affected; and
 - (iv) Social and cultural characteristics of displaced communities, and their host communities, including a description of formal and informal institutions. These may cover, for example, community organizations; cultural, social or ritual groups; and non-governmental organizations (NGOs) that may be relevant to the consultation strategy and to designing and implementing the resettlement activities.

Legal Framework: The analysis of the legal and institutional framework in the country should cover the following:

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- (i) Scope of existing land and property laws governing resources (including the differentiated impact for women and men), including state-owned lands under eminent domain and the nature of compensation associated with valuation methodologies; land market; mode and timing of payments, etc;
 - (ii) Applicable legal and administrative procedures, including a description of the grievance procedures and remedies available to PAPs in the judicial process and the execution of these procedures, including any available alternative dispute resolution mechanisms that may be relevant to implementation of the RAP for the sub-project;
 - (iii) Relevant laws (including customary and traditional law) governing land tenure, valuation of assets and losses, compensation, and natural resource usage rights, customary personal law; communal laws, etc related to displacement and resettlement, and environmental laws and social welfare legislation;
 - (iv) Laws and regulations relating to the agencies responsible for implementing resettlement activities in the sub-projects;
 - (v) Gaps, if any, between local laws covering resettlement and the Bank's resettlement policy, and the mechanisms for addressing such gaps; and

- (vi) Legal steps necessary to ensure the effective implementation of RAP activities in the sub-projects, including, as appropriate, a process for recognizing claims to legal rights to land, including claims that derive from customary and traditional usage, etc and which are specific to the sub-projects.

The institutional framework governing RAP implementation generally covers:

- (i) Agencies and offices responsible for resettlement activities and civil society groups like NGOs that may have a role in RAP implementation;
- (ii) Institutional capacities of these agencies, offices, and civil society groups in carrying out RAP implementation, monitoring, and evaluation; and
- (iii) Activities for enhancing the institutional capacities of agencies, offices, and civil society groups, especially in the consultation and monitoring processes.

Eligibility and entitlements: Definition of displaced persons or PAPS and criteria for determining their eligibility for compensation and other resettlement assistance, including relevant cut-off dates.

Valuation of and compensation for losses: The methodology to be used for valuing losses, or damages, for the purpose of determining their replacement costs; and a description of the proposed types and levels of compensation consistent with national and local laws and measures, as necessary, to ensure that these are based on acceptable values (e.g. market rates).

Resettlement Measures: A description of the compensation and other resettlement measures that will assist each category of eligible PAPs to achieve the resettlement objectives. Aside from compensation, these measures should include programs for livelihood restoration, grievance mechanisms, consultations, and disclosure of information.

Site selection, site preparation, and relocation: If a resettlement site is an option, describe the alternative relocation sites as follows:

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- (i) Institutional and technical arrangements for identifying and preparing relocation sites, whether rural or urban, for which a combination of productive potential, locational advantages, and other factors is at least comparable to the advantages of the old sites, with an estimate of the time needed to acquire and transfer land and ancillary resources;
 - (ii) Any measures necessary to prevent land speculation or influx of eligible persons at the selected sites;
 - (iii) Procedures for physical relocation under the project, including timetables for site preparation and transfer; and
 - (iv) Legal arrangements for recognizing (or regularizing) tenure and transferring titles to resettlers.

Housing, infrastructure, and social services: Plans to provide (or to finance resettler's provision of) housing, infrastructure (e.g. water supply, feeder roads), and social services to host populations; and any other necessary site development, engineering, and architectural designs for these facilities should be described.

Environmental protection and management. A description of the boundaries of the relocation area is needed. This descriptions includes an assessment of the environmental impacts of the proposed resettlement and measures to mitigate and manage these impacts (coordinated as appropriate with the environmental assessment of the main investment requiring the resettlement).

Community consultation and Participation: Consistent with the World Bank’s policy on consultation and disclosure, a strategy for consultation with, and participation of, PAPs and host communities, should include:

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- (i) Description of the strategy for consultation with and participation of PAPs and hosts in the design and implementation of resettlement activities, making sure that the strategy contemplates activities to address gender differences to access consultation processes;
 - (ii) Summary of the consultations and how PAPs’ views were taken into account in preparing the resettlement plan; and
 - (iii) Review of resettlement alternatives presented and the choices made by PAPs regarding options available to them, including choices related to forms of compensation and resettlement assistance, to relocating as individual families or as parts of pre-existing communities or kinship groups, to sustaining existing patterns of group organization, and to retaining access to cultural property (e.g. places of worship, pilgrimage centers, cemeteries); and
 - (iv) Arrangements on how PAPs can communicate their concerns to project authorities throughout planning and implementation, and measures to ensure that vulnerable groups (including indigenous peoples, ethnic minorities, landless, children and youth, and women) are adequately represented.

The consultations should cover measures to mitigate the impact of resettlement on any host communities, including:

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- (i) Consultations with host communities and local governments;
 - (ii) Arrangements for prompt tendering of any payment due the hosts for land or other assets provided to PAPs;
 - (iii) Conflict resolution involving PAPs and host communities; and
 - (iv) Additional services (e.g. education, water, health, and production services) in host communities to make them at least comparable to services available to PAPs.

Grievance procedures: The RAP should provide mechanisms for ensuring that an affordable and accessible procedure is in place for third-party settlement of disputes arising from resettlement. These mechanisms should take into account the availability of judicial and legal services, as well as community and traditional dispute settlement mechanisms.

RAP implementation responsibilities: The RAP should be clear about the implementation responsibilities of various agencies, offices, and local representatives. These responsibilities should cover (i) delivery of RAP compensation and rehabilitation

measures and provision of services; (ii) appropriate coordination between agencies and jurisdictions involved in RAP implementation; and (iii) measures (including technical assistance) needed to strengthen the implementing agencies' capacities of responsibility for managing facilities and services provided under the project and for transferring to PAPs some responsibilities related to RAP components (e.g. community-based livelihood restoration; participatory monitoring; etc).

Implementation Schedule: An implementation schedule covering all RAP activities from preparation, implementation, and monitoring and evaluation should be included. These should identify the target dates for delivery of benefits to resettlers and hosts and a clearly defined closing date. The schedule should indicate how the RAP activities are linked to the implementation of the overall project.

Costs and budget: The RAP for the specific sub-projects should provide detailed (itemized) cost estimates for all RAP activities, including allowances for inflation, population growth, and other contingencies; timetable for expenditures; sources of funds; and arrangements for timely flow of funds. These should include other fiduciary arrangements consistent with the rest of the project governing financial management and procurement.

Monitoring and evaluation: Arrangements for monitoring of RAP activities by the implementing agency, and the independent monitoring of these activities, should be included in the RAP section on monitoring and evaluation. The final evaluation should be done by an independent monitor or agency to measure RAP outcomes and impacts on PAPs' livelihood and living conditions. The World Bank has examples of performance monitoring indicators to measure inputs, outputs, and outcomes for RAP activities; involvement of PAPS in the monitoring process; evaluation of the impact of RAP activities over a reasonable period after resettlement.

RAP Audit/ completion report: the RAP should outline the timelines and procedure for the preparation of a RAP completion report/ Audit report when the RAP has been implemented.
