

Revised Final Report

**Smallholder Commercialization
Agribusiness Development Project (SCADeP)
Additional Financing**



Resettlement Policy Framework (RPF)



Ministry of Agriculture and Forestry (MAF)

World Bank Support

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Title: Smallholder Commercialisation Agribusiness Development Project (SCADeP)
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ACRONYMS AND ABBREVIATIONS

AF	Additional Finance
CBOs	Community Based Organizations
DAO	District Agricultural Officer
DCU	District Coordinating Unit
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPA-SL	Environmental Protection Agency-Sierra Leone
ESHIA	Environmental, Social and Health Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
EVD	Ebola Virus Disease
GBV	Gender-based Violence
GDP	Gross Domestic Products
GoSL	Government of Sierra Leone
LC	Local Council
M&E	Monitoring and Evaluation
MAF	Ministry of Agriculture and Forestry
MDG	Millennium Development Goal
MEST	Ministry of Education, Science and Technology
MFMR	Ministry of Fisheries and Marine Resources
MLCPE	Ministry of Lands, Country Planning and the Environment
MLGRD	Ministry of Local Government and Rural Development
MTI	Ministry of Trade and Industry
NEP	National Environmental Policy
OP	Operational Policy
PRSP	Poverty Reduction Strategy Paper
RAP	Resettlement Action Plan
RPSDP	Rural and Private Sector Development Project
SCADeP	Smallholder Commercialization and Agribusiness Development Project
SMEs	Small and Medium Enterprise
TOR	Terms of Reference
VRC	Village Resettlement Committee
WAAPPSL	West Africa Agricultural Productivity Programme in Sierra Leone

1 BACKGROUND

The Government of Sierra Leone, through the Ministry of Agriculture and Forestry, has been implementing the Smallholder Commercialization and Agribusiness Development Project (SCADeP) with an initial IDA credit of US\$40 million and a grant of the equivalent of US\$15 million from United Kingdom Department of International Development (DfID). The project development objective is to promote smallholder commercialization by fostering productive business linkages between smallholder farmers and selected agribusiness firms and other commodity off-takers in Sierra Leone. This objective is to be achieved through support for interventions aimed at improving agricultural productivity and access to markets as well as development of inclusive smallholder farmer-agribusiness linkages in the targeted project areas of Sierra Leone.

The Government of Sierra Leone in support of the Smallholder Commercialization and Agribusiness Development Project (SCADeP) has requested additional financing in an amount of US\$30 million and an extension of the Closing Date by twelve (12) months from November 30, 2021 to November 30, 2022. The proposed additional finance (AF) would address the project's financing gap for its feeder roads sub-component due to: (a) the withdrawal of United Kingdom Department of International Development (DfID) from the financing of the project and (b) higher costs than anticipated at appraisal for this sub-component. The proposed additional financing would be accompanied by a Level 2 restructuring to enhance the achievement of the Project Development Objective (PDO) and strengthen the development impact of SCADeP. This would be the second restructuring of the project, and it would include the following changes: (i) modification of the Agricultural Loan Scheme sub-component, (ii) changes to some outcome indicators and targets in the Results Framework and (iii) reallocation of the IDA credit's proceeds.

The SCADeP was approved by the Board of the World Bank on February 18, 2016, signed on March 15, 2016 and it became effective on November 30, 2016. The Project was originally financed by an International Development Association (IDA) credit of SDR 28.9 million (US\$40 million equivalent) and a co-financing by DfID for a total amount of the equivalent of US\$15 million to support the feeder roads sub-component of the project under Component 2 (Market Access Improvement). On October 10, 2018, DfID notified the Government of Sierra Leone that it was withdrawing its commitment to the co-financing of the IDA credit with the closing date of the DfID Trust Fund fixed on May 30, 2019. The closing date of the IDA Credit is November 30, 2021.

The proposed AF is consistent with Sierra Leone's goal of achieving inclusive growth which is one of the key pillars of the country's Poverty Reduction Strategy Paper (PSRP-III) - (2013-2017). It continues to be with the new Mid-Term National Development Plan (2019–2023). This is to be achieved through the promotion of agribusiness development as a basis for the commercialization of smallholder farmers. Furthermore, the proposed project is aligned to the new National Agricultural Transformation Agenda (NAT) 2023. The project is also consistent with the new Country Partnership Framework for 2018–2022, under preparation, that reiterates the important role of agriculture for inclusive growth and development is well aligned with the World Bank's twin goals of reducing extreme poverty and promoting shared prosperity.

The project development objective (PDO) is to promote smallholder commercialization by fostering productive business linkages between smallholder farmers and selected agribusiness firms and other commodity off-takers in Sierra Leone. The project has four components:

Component A: Support for Agri-business-farmer Linkages and Small and Medium Scale Enterprises along selected agricultural value chains (US\$19.00million). This is to strengthen linkages between agribusiness firms and farmers and promote producer associations and SMEs linkages operating in selected agricultural value-chains. The project will address the various financing needs of value chain actors through the design and implementation of proven agribusiness financing instruments that meet actors' specific financing needs. Sub-component A.1 promotes an out-grower model for value chain financing to agribusinesses linked to out-growers, while Sub-component A.2 provides support for farmer aggregation to facilitate inclusion of farmers who produce for the market but do have structured linkages with off-takers;

Component B: Market access improvement (US\$26.00 million). This component seeks to address market access and coordination issues that constrain smallholder productivity and market efficiency.

Sub-component B1 supports the rehabilitation and maintenance of feeder roads that link agribusinesses to smallholder producers and markets, while sub-component B2 provide aggregation centres for farmers as well as simple market coordination (through Information, Communication Technologies (ICT) or cell-phone based price information systems);

Component C: Capacity building support for state and non-state institutions and producer organizations. This component focuses on addressing the skills and organizational challenges that affect smallholder farmers' inclusion into organized supply chains. The project will provide technical assistance to farmers' producer organizations, strengthen the capacity of state and non-state institutions responsible for the provision of services relevant for smallholder commercialization and agribusiness development; and

Component D: Project coordination, monitoring and evaluation. Caters for the day-to-day management of the project.

The SCADeP aims at supporting sub-projects that could lead to an increase in farmers' productivity, commodity sales and incomes and ultimately the aggregate value added for key agricultural value chains. The project will support: (i) production of commodities such as rice, oil palm, cocoa and poultry (eggs and meat); (ii) processing of agricultural and poultry products; (iii) trading and marketing of these commodities; (iv) rehabilitation and maintenance of feeder roads to facilitate smallholder access to markets; and capacity building of farmers and agribusinesses operating along the four selected value-chains.

The Environmental and Social Management Framework (ESMF) has been developed as a policy guideline that will be used as a decision-making tool to ensure that all the subprojects selected and implemented under the SCADeP are environmentally and socially responsive and sound. The ESMF demands that each subproject will require environmental and social assessment that covers (i) legal and regulatory mechanisms, (ii) institutional arrangements, (iii) environmental management, and (iv) social assessment. The ESMF will be reviewed and approved for disclosure before project appraisal. It is also planned that the ESMF will be regularly updated to respond to changing local conditions.

1.1 Objectives of the RPF

Even though it is not envisaged that the SCADeP will support any activities that will entail physical displacement of people, a Resettlement Policy Framework (RPF) has been developed as per the World Bank Policy Guidelines (OP4.12) in order to have a framework in place to deal with any unforeseen circumstances which may arise as a result of the SCADeP implementation. For example, it is possible that rehabilitation of feeder roads, construction of bridges, construction of sub projects facilities like processing and marketing centers, office space and demonstration farms and other civil works related activities, may have some land acquisition or loss of income, livelihood or access to assets.

Based on the parent project SCADeP, on average 10 people were impacted per community. Thus, for the AF activities, majority of the civil works will take place outside of communities with minimal impacts to PAPs and effect approximately 4 communities and +/- 40 people. However, the exact nature/scale of resettlement and the magnitude of land acquisition or restrictions on land use will be determined when the specific project sites are selected.

The purpose of the Resettlement Policy Framework (RPF) is to guide resettlement principles, compensations, organizational arrangements, and design criteria to be applied to subprojects to be prepared during project implementation. The RPF will provide project stakeholders with procedures to address compensation issues as related to affected properties (including land and assets) and livelihoods including land and income generated activities during project implementation. Subproject resettlement plans consistent with the policy framework subsequently are submitted to the Bank for approval after specific planning information becomes available.

The RPF will assist the Project implementation team in:

- (i) screening all subprojects for land acquisition and physical and/or livelihood displacement resulting from such land acquisition; and

- (ii) Identifying documentation and preparation requirements for compliance with World Bank Safeguards Policy.

In the unlikely event that the project leads to land acquisition and/or resettlement, Abbreviated Resettlement Plans (ARPs) and/or Resettlement Action Plans (RAPs), as may be applicable, will be prepared for specific sub-projects in accordance with the RPF. The Resettlement Policy Framework will form part of the project's Operations Manual.

2 LEGISLATION AND REGULATORY FRAMEWORK

2.1 National Legislation

2.1.1 The Constitution of Sierra Leone (1991)

The Constitution includes some 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.

2.1.2 National Lands Policy (August, 2015)

The National Lands Policy addresses many of the lapses of the dual land tenure system in Sierra Leone (freehold in the Western Area and communal in the provinces). It also provides for the compulsory acquisition of land in the public interest, known as tabn. Compulsory acquisition is the power of the State to acquire or extinguish any title or other interest in land for a public purpose. Provisions in the policy ensure that the planning and process for expropriation are transparent and participatory, and should provide information regarding possible alternative approaches to achieve the public purpose. The principles of the land policy include:

- 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. Such principle only holds where it does not violate existing rights of private ownership.
- Compensation to be paid for lands acquired through compulsory acquisition will be fair and adequate and will be determined, among other things, through negotiations that take into consideration government investment in the area.
- 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.
- 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 power of compulsory acquisition is subject to three conditions: (i) the acquisition must be necessary in the interest of defense, public safety, public order, public morality, public health, Town and Country Planning, and the development and utilization of the property to promote the public benefit; (ii) there must be reasonable justification for any hardship suffered; and (iii) a law must exist, such as Cap 116, that enables the person deprived to have recourse to the courts for relief if need be.

2.1.3 National Environmental Policy (1994) and Cultural Heritage Issues

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 utilization of natural resources. There are references to the preservation and/or respectful removal (taking into consideration cultural sensitivities) of "society bushes" for large-scale agribusiness and other purposes in various regulations.

2.1.4 The Local Government Act, 2004

The Act establishes the Local Council as the highest political authority in the locality who shall have legislative and executive powers to be exercised in accordance with this Act. This Act in its First Schedule under section 2 establishes the localities namely: Districts, Towns, and Cities. The part II of this schedule also establishes the number of Paramount Chiefs in each local council. The Third Schedule establishes the functions to be devolved to the local councils. The Fourth and Fifth Schedules establish departments under each local council, and Valuation list and Rate Books respectively.

2.2 Key Institutions

Ministry of Lands, Country Planning and Environment (MLCPE)

Land governance in Sierra Leone is the responsibility of several state and private agencies, departments, offices and officials. The Ministry of Lands, Country Planning and Environment (MLCPE) is the main institution responsible for taking leadership of all land matters in the country. It is responsible for land registration, and preparation of land use plans.

Office of the Administrator and Registrar General (OARG)

Office of Administrator and Registrar General (OARG) only functions in the Western Area, situated in Freetown, the capital city. It has as its supervisory Ministry, the Office of the Attorney General and Ministry of Justice; and generates revenue for the government. The OARG is responsible for the registration and administration of every instrument required to be registered by law including land transactions, industrial property, business registration, marriages and administration of estates of the deceased, apart from that of “births and deaths”.

The main link between the MLCPE and OARG is that survey plans are prepared by the MLCPE and sent to OARG for registration. There has been an attempt to automate the link between OARG and MLCPE in the transfer of land documents through the implementation of the Land Registration Project at MLCPE and the Electronic Documentation of Land Records Project at OARG, both funded by the Investment Climate Facility for Africa. The OARG is responsible for registering land instruments (survey plans and conveyances), as established by the General Registration Act of 1960 (Cap 256).

2.3 Land Ownership and Tenure System

Land tenure in Sierra Leone is characterized by a dual ownership structure due to historical developments. The Western Area including the Freetown Peninsula is governed by an English system of land ownership which includes fee conveyances, mortgages and leases. Unoccupied and uncultivated land remain Crown (State) land. Thus, land in these areas is either owned by individual families or is Crown land. Communally owned land does not exist in the Western Area.

Land in the rest of the country (i.e. the majority of the agricultural land) is held in communal ownership under customary tenure and is controlled by traditional rulers who administer it on behalf of their communities in accordance with customary principles and usage. Though there are minor differences among the various ethnic communities, the general trend is that land is considered a divine heritage not to be bought and sold.

The responsibility to ensure the preservation of the land and subsequent enjoyment by future generations therefore rests on the community as a whole. The absolute interest in land vests in families. In other words, it is the land-owning family, which deals in its land. The Paramount Chief is regarded as the custodian of the land on behalf of the entire Chiefdom but decisions regarding the land are the preserve of heads of the various land-owning families.

2.4 World Bank Safeguard Policy

2.4.1 Procedures for Involuntary Resettlement according to World Bank OP 4.12

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 minimize 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 Project Affected Persons (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 OP 4.12 further requires particular attention to be given to the needs of vulnerable groups especially those below the poverty line, including:

- i. Landless individuals and households;
- ii. Elderly persons
- iii. Women and children;
- iv. Indigenous groups and ethnic minorities; and
- v. Other disadvantaged persons.

2.4.2 Comparison of Sierra Leonean Regulations and World Bank Policies

There are significant gaps between Sierra Leonean regulations and World Bank policies. These are summarized in **Table 1-1**.

Table 1-1: Comparison of Sierra Leonean Regulations with World Bank Policies

Topic	Sierra Leonean Legislation Requirement	WB policy requirement	Proposed Gaps Filling Procedures and Responsible Entity
Timing of compensation payment	Prompt	Prior to displacement	Compensation payments are to be done prior to displacement. PCU
Calculation of compensation	Fair and adequate.	Full replacement cost	The Full Replacement Cost Approach will be adopted for the calculation of compensation. No depreciation will be considered. Ministry of Land, Country Planning and Environment (MLCPE)
Squatters	No provision for PAPs with no claim whatsoever to land. Are deemed not to be eligible and therefore not entitled to any compensation	Are to be provided resettlement assistance and compensation for lost or damaged structures, and trees or crops they planted (but no compensation for land itself)	Squatters are to be provided resettlement assistance and compensations for crops, trees and structures (but no compensation for land). Ministry of Land, Country Planning and Environment (MLCPE)

Topic	Sierra Leonean Legislation Requirement	WB policy requirement	Proposed Gaps Filling Procedures and Responsible Entity
Land Tenants (A tenant is a person who has the right to use and occupy rental property in accordance with a rental agreement or lease. The tenant is also referred to as the "lessee" of rental property)	Entitled to compensation based upon the amount of rights they hold upon land under relevant laws.	Are entitled to some form of compensation whatever the legal recognition of their occupancy	Land tenants attract compensation irrespective of the legal recognition of their occupancy. Ministry of Land, Country Planning and Environment (MLCPE)
Land Users (A user is a person who does not have a legal agreement or right to use or occupy land)	In some cases, land users have some form of secured tenure extended to them under new laws. In other cases, land users not entitled to compensation for land, entitled to compensation for crops and any other economic assets.	Entitled to compensation for crops, may be entitled to replacement land and income must be restored to pre-project levels at least.	-
Users of natural resources subject to be put under control of conservancy members for sustained use and development	No compensation when law is followed	Entitled to compensation for lost income from loss of access to or use of resources: lost income must be computed, and restored to pre-project levels at least.	Compensation to be provided for lost income. Ministry of Land, Country Planning and Environment (MLCPE)
Owners of "Non-permanent" buildings (temporary structures made of various materials including wood, zinc roofing sheets, tarpaulin etc.)	Cash compensation based on market value or entitled to new housing or authorized land under Government (State or local) housing programs	Entitled to in kind compensation or cash compensation at full replacement cost including labour and relocation expenses, prior to displacement	PAPs entitled to in kind compensation or cash compensation at full replacement cost including labour and relocation expenses, prior to displacement. Ministry of Land, Country Planning and Environment (MLCPE)
Owners of Permanent Buildings	Cash Compensation is based on market value	Entitled to in kind compensation or cash compensation at full replacement cost including labour and relocation expenses, prior to displacement	PAPs entitled to in kind compensation or cash compensation at full replacement cost including labour and relocation expenses, prior to displacement. Ministry of Land, Country Planning and Environment (MLCPE)
Resettlement	In situations where inhabitants have to be displaced, the state is to resettle all on "suitable	Affected people who are physically displaced are to be provided with residential housing, or	Physically displaced PAPs are to be provided with housing sites at least equivalent to the old site.

Topic	Sierra Leonean Legislation Requirement	WB policy requirement	Proposed Gaps Filling Procedures and Responsible Entity
	land with due regards for their economic well-being and social and cultural values”.	housing sites, or, as required, agricultural sites at least equivalent to the old site. Preference to be given to land-based resettlement for displaced persons whose livelihoods are land-based.	Preference to be given to land-based resettlement for displaced persons whose livelihoods are land-based (i.e. farmers, etc.). Alternatively, physically displaced PAPs can also be given equivalent cash compensation to be able to acquire similar land and put up a housing unit equivalent to the affected structure. Ministry of Land, Country Planning and Environment (MLCPE)
Resettlement assistance	No specific provision with respect to additional assistance and monitoring.	Affected people are to be offered support after displacement, for a transition period	Affected people are to be offered resettlement support to cover a transition period. Ministry of Land, Country Planning and Environment (MLCPE)
Vulnerable groups	No specific provision	Consideration should be given to vulnerable groups, especially those below the poverty line, the landless, the elderly, women, children and the disabled,	Consideration should be given to vulnerable groups, especially those below the poverty line, the landless, the elderly, women especially widows and single parent, children and the disabled. Ministry of Land, Country Planning and Environment (MLCPE)
Information and consultation	The owner/occupier of the land must be formally notified at least a week in advance of the intent to enter, and be given at least 24 hours’ notice before actual entry	Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement.	Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementing, and monitoring resettlement. PCU, MAF and Ministry of Land, Country Planning and Environment (MLCPE).
Grievance	Formal and informal mechanisms and formal access to court of law	Functional, effective, transparent and accessible grievance mechanisms to be established	Functional, effective, transparent and accessible grievance mechanisms to be established. PCU

3 INSTITUTIONAL ARRANGEMENTS FOR THE IMPLEMENTATION OF THE RPF

3.1 Implementing Agency

The project proponent is the implementing agency and will ensure that the implementation of the RPF will be in compliance with the existing legislation related to the expropriation of land for public purposes, payment of compensation and resettlement of affected persons. The project proponent should provide all the necessary financial resources for the implementation of the resettlement and compensation payment process and provide all managerial and technical expertise required to the implementation of the RPF in an effective and proper manner. During the preparation and implementation of the resettlement and compensation payment process; the project should to cooperate with various government agencies and other stakeholders at various levels, which are briefly described below.

3.1.1 National Level

Various Government Agencies will act as primary support agents to the project proponent during the preparation and execution of the entire resettlement and compensation payment process. The implementation activities will be under the overall guidance of the PCU. The responsibilities of the various institutions are presented in the table below.

No.	Institution	Responsibility
1.0	Project Coordinating Unit	<ul style="list-style-type: none"> Overall supervision of the RPF. Trigger the process through screening and inventory of affected persons and assets and implement plan.
2.0	Ministry of Agriculture and Forestry (MAF)	<ul style="list-style-type: none"> Support the execution of the census during the preparation of RAP, in particular the inventory of crops and economic trees. To assist with compensation negotiations (in kind) where necessary To assist in grievance redress matters
3.0	Ministry of Local Government and Rural Development	<ul style="list-style-type: none"> Act as the primary Government representative; Support the project proponent in providing assistance to relocated households as and when required; Ensure compatibility of the resettlement process with overall development visions for the area; and Ensure that the Land Plan for the host resettlement area meets requisite legislative criteria.
3.0	Sierra Leone Environmental Protection Agency (EPA)	<ul style="list-style-type: none"> Review screening reports and advise on level of environmental assessment if necessary Assist with training and capacity building of other institutions Ensure environmental standards in the Project area; and Monitor the Environmental and Social Management Plan.
4.0	Ministry of Land, Country Planning and Environment (MLCPE)/ Office of	<ul style="list-style-type: none"> To undertake the valuation of affected properties and compensation due PAPs.

No.	Institution	Responsibility
	Administration and Registrar General (OARG)	<ul style="list-style-type: none"> Support the execution of the census during the preparation of RAP, in particular the measuring and recording of structure dimensions, including all their features.
5.0	District Council and Traditional authorities	<ul style="list-style-type: none"> To assist with community awareness creation, notifications and support in the inventory of affected persons and compensation related issues. To assist in grievance redress matters

3.1.2 Regional Level

The agencies involved in implementing the resettlement and compensation payment program at regional level include the Regional Housing Officer and Regional Agriculture Officer, who will mainly be involved in the asset inventory during the preparation of the RAP.

3.1.3 Local Level

3.1.3.1 Village Resettlement Committees

A Village Resettlement Committee (VRC) should be formed for each larger affected village or a few small villages together. The VRC will consist of representatives of all Project Affected Persons (PAPs), including representatives of vulnerable groups. The main tasks of the VRC is to address issues dealing with all aspects concerning compensation payment, identification of relocation sites, contribution to development of infrastructure at relocation site, monitoring of the implementation of RAP, and assessment of the effects of relocation on PAPs.

3.1.3.2 Other Local Agencies

In addition to the VRC, it is envisaged that the following agencies will be involved in the resettlement and compensation payment process at the local level:

- i. Chiefdom Authority Representative(s) with the following key responsibilities: a) confirmation of land ownership; b) confirmation of features of cultural/archaeological significance (i.e. shrines); and c) resolution of ownership disputes; and
- ii. Chiefdom Native Administration with the main task to assist the village leaders.

3.2 Preparation of ARAPs/RAPs and Setting up of Resettlement Management Teams

Where an ARAP or RAP is prepared for any SCADeP, subproject/activity, Resettlement Management Teams should be proposed and included in the documents. The resettlement management teams should consist of three smaller teams namely:

- Compensation Team;
- Grievance Redress Team; and
- Monitoring and Evaluation Team.

Where ARAPs/RAPs are required and have been approved by the World Bank for implementation, the PCU in consultations with the District Agricultural Officers of MAF will set up these resettlement management teams in line with the provisions in the ARAP/RAP. The Compensation Team will be responsible for organizing and ensuring that compensations due or payable to PAPs are made in line with the provisions and procedures of this RPF.

The Grievance Redress Team will be responsible for receiving and logging complaints and resolving disputes. The team will undertake follow-ups on all measures taken to resolve each grievance or dispute to ensure that redress actions are implemented by whoever is mandated to undertake such action. The Monitoring and Evaluation Team will be responsible for the monitoring of the resettlement instrument implementation to ensure that stated targets are met and project affected persons are duly compensated in line with the provisions in the resettlement instrument.

Team members will be existing government staff from the implementing partners (IPs) listed below, that have the skill set required for the relevant teams, but additional members can be added as necessary. The terms of reference for each team are outlined in Annex 4.

Compensation Team	Grievance Redress Team	Monitoring and Evaluation Team
<ul style="list-style-type: none"> - Ministry of Land, Country Planning and Environment (MLCPE)/ Office of Administration and Registrar General (OARG) - Ministry of Agriculture and Forestry (MAF) - Ministry of Finance (MoF) - Regional Housing Officer and Regional Agriculture Officer - SCADeP PCU Finance Department 	<ul style="list-style-type: none"> - SCADeP PCU ESSS - Ministry of Agriculture and Forestry (MAF) - Ministry of Local Government and Rural Development - Sierra Leone Environmental Protection Agency (EPA) - District Council and Traditional authorities - Village Resettlement Committee (VRC) 	<ul style="list-style-type: none"> - SCADeP PCU M&E Specialist - Sierra Leone Environmental Protection Agency (EPA) - Village Resettlement Committee (VRC)

4 VALUATION OF AFFECTED ASSETS AND COMPENSATION

4.1 Valuation of Properties

The purpose of the valuation will be to assess the overall Compensation Payable as part of the assessment of resettlement related issues under the SCADeP. The scope of the valuation covers land, structures and crops/economic trees on the project site to be affected and also unavailable to the owner for usage. Loss of income or disruptions to livelihoods are considered as far as it may be appropriate for payment of compensation for the period of disruption of farming /livelihood/business.

Compensation will be determined by taking all assets into account, including land, crops, trees, buildings and structures, sacred sites, vegetable gardens and beehives, horticultural, floricultural and fruit trees, and other domestic cash crops and fruit trees.

4.1.1 Basis of Valuation

The basis of the valuation is derived from the World Bank's Involuntary Resettlement Policy, OP 4.12; and the Constitution of Sierra Leone.

4.1.2 Valuation Responsibility

The Ministry of Land, Country Planning and Environment in consultation with the Office of Administration and Registrar General will be requested to value affected assets/properties based on the full replacement cost principle (which include transaction cost such as labour and transport cost). Certified private valuers may also be engaged where necessary especially involving private persons or if required to assist the process. These professional valuers to be used will be required to provide evidence where necessary that the rates applied are consistent with the "full replacement value" requirement.

4.2 Types of Compensation Payments

Individual and household compensation will be made in kind and/or in cash based on preferences of project affected persons. For cash payments, compensation will be calculated in the national currency 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.

Making cash payments raises issues regarding inflation and security that have to be considered. Cash payments must allow for inflationary adjustments of compensation values. For payment of compensation in-kind, the time and new location will have to be decided and agreed upon by each recipient.

In kind compensation should be strongly recommended to an affected person if his or her loss amounts to more than 20% of the total loss of subsistence assets. The preference for in-kind compensation is because it offsets inflationary pressures on the costs of goods and services and hence provides better livelihood security for affected persons.

4.2.1 Other Considerations for the Compensation Package

Livelihood Assistance/Loss of Income

The estimation for loss of income (referred to as livelihood assistance) for affected farmers/businesses will be generally based on the following factors:

- estimated income of farmers or daily sales of produce from farms or the business units; and
- estimated period of construction or SCADeP activity which will disrupt farming or business or commercial activity.

Losses of income for farmers/businesses will be estimated from net monthly/annual profit of the farm/business verified by an assessment of visible stocks and activities.

Resettlement/Relocation Assistance

Where PAPs are to be physically displaced or relocated, resettlement assistance should be provided to take care of the transport cost of mobilising and moving the affected properties to a new location and an accommodation assistance where affected persons will have to rent accommodation at the initial stages.

Disturbance Allowance

Cost of disturbance is one of the components to be considered when determining compensation for PAPs (especially for affected structures, crops and livelihoods). Based on rates approved by the Ministry of Lands, Country Planning and Environment, it is recommended to apply 10% of affected property value /compensation as disturbance allowance.

4.3 Compensation Calculations for Assets

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

- i. Cultivated land and crops;
- ii. Residential buildings, structures and fixtures;
- iii. Sacred sites;
- iv. Vegetable gardens and beehives;
- v. Horticultural, floricultural and fruit trees;
- vi. Other domestic trees; and
- vii. Loss of businesses or employment

4.4 Rules for Compensation

Households, individuals and communities deemed to be entitled to compensation will be 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. In some instances, this may have to be re-examined and negotiated with individuals within the household.

These criteria need to be defined early in the resettlement process and should be agreed to by all stakeholders. 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:

- i. Compensation options in terms of replacement of homesteads, structures and replacement land for physical resettlement where this is necessary;
- ii. Options for the relocation of graves and sites of cultural, historical or religious importance; and
- iii. Relocation and replacement of any community structures (i.e. schools).

4.4.1 Compensation for Cultivated Land and Crops

A farmer whose land is acquired for the purposes of implementing a subproject financed either wholly or partly by SCADeP proceeds will be compensated not only for the land, but also for his labour and crop loss. In this context, "land" is defined as an area in cultivation, or being prepared for cultivation, or cultivated during the previous agricultural season. Compensation relating to land will cover the market price of labour invested in it as well as the market price of the crops lost.

4.4.2 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 current market price.

4.4.3 Compensation for Residential Buildings, Structures and Fixtures

Compensation will be paid by replacing structures such as huts, houses, farm outbuildings, latrines and fences. Any homes lost will be rebuilt on acquired replacement land, however cash compensation would be available as a preferred option for structures (i.e. extra buildings) lost that are not the main house or house in which someone is living. 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.

Compensation will be made for structures that are:

- i. Abandoned because of relocation or resettlement of an individual or household; or
- ii. Directly damaged by construction activities.
- iii. Replacement values will be based on:
- iv. Drawings of individual's household and all its related structures and support services;
- v. 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.);
- vi. Prices of these items collected in different local markets;
- vii. Costs for transportation and delivery of these items to acquired/ replacement land or building site; and
- viii. Estimates of construction of new buildings including labour required.

4.4.4 Compensation for Sacred Sites

Compensation for sacred sites (i.e. ceremony and reconstruction) is determined through negotiation with the appropriate parties. Sacred sites include but are not restricted only to altars, initiation centers, ritual sites, tombs, and cemeteries. They include other such sites, places or features that are accepted by practice, tradition and culture as sacred.

4.4.5 Compensation for Vegetable Gardens

Vegetables and green leaves are essential ingredients for food in most Sierra Leonean homes. The family displaced/affected as a result of the land acquisition will have to purchase these items in the market until a replacement garden starts to bear. The compensation will, therefore, be calculated based on the average amount that and average household spends on buying these items for one year per adult from the local market.

4.4.6 Compensation for loss of Business or Employment

Compensation for businesses (i.e. flour mills, kiosks, coffee houses and local eating and drinking places) will be estimated based on the daily or monthly income of the affected parties.

5 ELIGIBILITY CRITERIA AND ENTITLEMENT MATRIX

5.1 Affected Parties

Affected groups under the SCADeP and in line with the definitions outlined in the national legislation and OP 4.12 can be categorized into the following groups:

- **Affected individual:** Individual who suffers loss of assets or investments, land and property and/or access to natural and/or economic resources as a result of the Project activities and to whom compensation is due.
- **Affected household:** Household is affected if one or more of its members is affected by Project activities, either by loss of property, land, loss of access, or otherwise affected in any way by Project activities.
- **Affected local community:** Community is affected if Project activities affect their socio-economic and/or social-cultural relationships or cohesion.

5.2 Eligibility for Compensation

5.2.1 Eligible Individuals and Households

Fixing eligibility criteria for entitlement purpose is essential for the resettlement process and compensation payments. According to the World Bank OP 4.12 procedures, the following PAPs will be eligible for compensation:

- a) Those who have formal rights to land, including customary and statutory rights of occupancy recognized under the national laws;
- b) Those who do not have formal legal rights to land at the time the census begins, but have a claim to such land or assets provided that such claims are recognized under national laws (The Constitution of Sierra Leone, 1991 and National Lands Policy, 2015), or become recognized through a process identified in the RAP; and
- c) Those who have no claim to land they are occupying or using.

Those covered under a) and b) above are to be provided compensation for land they lose, and other assistance in accordance with the policy. Persons covered under c) above are to be provided with resettlement assistance in lieu of compensation for the land they occupy or use as well as other assistance, as necessary, to achieve the objectives set out in this policy, if they occupy or use the Project area prior to a cut-off date established by the responsible agency. Persons who encroach on the area after the cut-off date are not entitled to compensation or any other form of resettlement assistance. All persons included in a), b) or c) above are to be provided with compensation for loss of assets other than land.

Upon identification of the need for involuntary resettlement in the Project area, the implementing agency will carry out a census to identify the persons to be affected by the Project, to determine who will be eligible for assistance, and to discourage inflow of people ineligible for assistance. The implementing agency will also develop a procedure for establishing the criteria by which affected persons will be deemed eligible for compensation and additional resettlement assistance. The procedure will include provisions for meaningful consultations with affected persons and communities, local authorities and NGOs as well as the grievance mechanisms.

5.2.2 Eligible Communities

Communities permanently losing land and/or access to assets and or resources under statutory or customary rights will be eligible for compensation. Example of community compensation could be for market place, schools and health posts. The rationale for this is to ensure that the pre- Project socio-economic status of affected communities are also restored.

5.2.3 Eligibility According to National Law

In determining eligibility, the national legislation may differ from the World Bank Policy. If there are differences between the two, the World Bank OP 4.12 applies as outlined in Section 2.4.2.

5.2.4 Eligibility Criteria and Entitlements

Table 2.1 presents the eligibility criteria and entitlement matrix for the general categories of impacts that could occur under the SCADeP parent project and additional finance activities.

Table 2-1: Eligibility Criteria and Entitlements

Affected Assets	Type of impact	Entitled units	Eligibility criteria	Entitlement
Land	Permanent acquisition of land,	Landowner (individual, family, community/stool)	Owens the affected plot of land under Sierra Leonean laws including customary	1. Cash compensation for determined by prevailing market rates.
	Temporary occupation of land	Landowner (individual, family, community/stool)	Owens the affected plot of land under Sierra Leonean laws including customary	1. Compensation (in cash or kind) for the period of occupation as agreed among the parties via negotiation.
Crops (food/cash crops and economic trees inclusive)	Destruction of/ damage to standing crops	Owner or Farmer	Have grown the affected crop (regardless of related plot ownership)	1. Cash compensation for standing crops counted at valuation date and based upon updated Ministry of Agriculture and Forestry (MAF) rates, and 2. Disturbance allowance of 10% of (1) or at a rate determined by Ministry of Land, Country Planning and Environment (MLCPE).
Structures	Destruction of immovable structures	Owner	Owens affected structure	1. Compensation at full replacement cost of structure 2. Cost of moving (e.g. persons/ goods in the structure under or belonging to owner) 3. Disturbance allowance of 10% of (1) or at a rate determined by the MLCPE
		Occupant	Live in or use the affected structure on rental basis (Occupant different from owner)	1. Cost of renting similar structure (e.g. for 6 months duration) 2. Cost of moving out to new place 3. Disturbance allowance of 10% of (1) or at a rate determined by the MLCPE
		Owner	Owens the affected structure	1. Cost of moving affected structure to new site

Affected Assets	Type of impact	Entitled units	Eligibility criteria	Entitlement
	Relocation of movable structures			2. Disturbance allowance of 10% of (1) or at a rate determined by the MLCPE
		Occupant	Use or occupies the affected structure	1. Cost of moving occupants to new site 2. Disturbance allowance of 10% of (1) or at a rate determined by the MLCPE [NB: if owner is same as occupant, he/she will not be entitled to this disturbance allowance].
Livelihoods	Agriculture - destruction of economic or cash crops	Farmer	Use affected land for farming as livelihood sources (emphasis on perennial crops. Annual crops can be harvested prior to land entry or destruction)	1. Cash compensation for any temporary loss of income or livelihood incurred as a result of the project during the transition period (period required to re-establish farm elsewhere).
	Businesses	Business person (may be distinct from owner of structure where business takes place)	Operate a business on Project affected land, regardless of the land ownership situation (includes squatters)	1. Cash compensation of temporary loss of income or livelihood incurred because of the Project during the period required to re-establish the business to pre-Project conditions
	Use of communal resources such as livestock grazing grounds, (or involuntary restrictions to community assets)	User of such resources (can be individuals or communities)	Use communal resources as an element of livelihood	1. Assistance in identifying and accessing similar resources elsewhere 2. Cash compensation of temporary loss of income incurred because of the Project during the period required to access similar resources elsewhere/period required to provide alternative livelihood assistance
Cultural heritage resource (e.g. sacred site).	Relocation of or removal of cultural heritage resource located on project site	Owner (individual or community)	Use or pay homage to cultural heritage resource/ sacred site	Negotiate with owner or community with regard to rites to be performed to ensure successful relocation or removal of cultural resource/ sacred site in accordance with Chance Find procedures prescribed under the ESMF.

6 RESETTLEMENT AND PAYMENT PROCESS

6.1 Selection of Potential Resettlement Sites

Resettlement requires the physical relocation of people to a new location. If resettlement of affected households and communities is required, the implementing agency has to identify and select one or more potential sites for the relocation of affected households and communities. The process of identifying and selecting potential resettlement sites should be consultative, transparent and accountable. During the entire process of selecting potential resettlement sites, the affected households and communities as well as the host communities must be informed and consulted continuously, so that their concerns and preferences are properly taken into account during the decision-making process. During site selection process, the following issues should be considered:

- i. Location; aim for closest to current location
- ii. Access to natural resources, in particular arable land;
- iii. Maintaining community structure;
- iv. Continued access to existing economic activities; access to social services
- v. Impacts on host communities; building good community relations
- vi. Land ownership and tenure rights. However, it must be noted that in this project, no physical displacement or relocation of PAPs is expected.

6.2 Implementation and Monitoring Procedures

6.2.1 Notification of Expropriation Order

The implementing agency should issue a written notification to the VRC for all lands it wishes to expropriate. It should also with support of the local administration organize meetings at village level, during which all affected households should be verbally notified as well.

6.2.2 Preparation of Individual Compensation Dossiers

The implementing agency with the support of the local administration has to prepare a compensation dossier for each individual affected household, which shall contain all necessary personal information of the affected household as well as detailed information with regard to the total landholding and the inventory of all assets that will be lost due to the land expropriation and resettlement. All information in the compensation dossier has to be confirmed and witnessed by the local administration and the VRC. Each affected household will receive a copy of the completed compensation dossier.

6.2.3 Preparation, Approval and Signing of Compensation Contract

Using the completed compensation dossiers, the implementing agency should prepare a compensation contract for each affected household, in which all property and land to be expropriated are listed as well as the selected options and types of compensation (cash and/or in-kind). The cash amount of compensation to be paid to the affected household is also specified in the compensation contract, including any displacement compensation to be paid. Taking into account the low literacy rates in the affected villages, the compensation contract should be read aloud in the presence of the affected party. In the presence of the implementing agency, local administration and VRC, the compensation contract should be signed by all concerned parties

6.3 Payment of Compensations

Following the signing of the compensation contract, the implementing agency should pay or cause the payment of compensation to holders of the expropriated land. Communities must also be paid compensation for the expropriation of communal land if it is required for the implementation of the Project and/or the resettlement of displaced households. The land and any related assets can only be taken by the implementing agency after the compensation is fully paid to the affected households and communities.

In addition to payment for the acquisition of communal land, a community will also be compensated in kind for the loss of any communal infrastructure i.e. school buildings, health post, boreholes or wells for potable water, market structures, roads, warehouses, etc.) in the form of the reconstruction of the lost facilities to at least the same standard or better standard to serve the same function. The system for cash compensation should ensure that women's access to compensation should not be eroded. Compensation methods should also consider special needs of vulnerable people.

In the event that, compensation is delayed, each eligible affected person will sign a compensation claim and commitment form (Annex 3) together with the authorised project representative in the presence of a witness. The compensation claim form will clarify mutual commitments as follows:

- On the project side: commitment to pay the agreed compensation, including all its components (value of affected property- cash or in-kind, disturbance, assistance to farmers to continue with farming occupation and or relocation/transportation assistance if any); and
- On the affected person's side: commitment to vacate or release the land by the agreed date.

6.4 Resettlement of Affected Households

The implementing agency should only proceed with the relocation of the displaced households after the compensation has been paid fully, the preparation of the resettlement sites is completed and the displaced households had the opportunity to visit the resettlement sites.

Immediately after the arrival of the displaced households on the resettlement sites, the implementing agency should undertake the necessary measures needed to restore and develop their livelihoods and standard of livings through the provision of development assistance, such as (i) improved seeds, chemical fertilizers and agro-chemicals in the first year following the relocation; (ii) agricultural extension and veterinary services, including improved breeding stock; (iii) tree seedlings; (iv) skill training, technical advice and/or credit facilities required for development (off-farm) job opportunities.

6.5 Monitoring

The monitoring of the Project activities related to land expropriation, compensation payment and resettlement must fit in the overall monitoring framework and program for the entire Project.

The main objective of the monitoring plan is to provide all concerned stakeholders with timely and updated information and data with regard to the execution of the RAP, including the progress with regard to payment of compensation and resettlement. In this way, all concerned stakeholders will be able to assess if:

- the RAP is implemented in accordance with the implementation schedule;
- the RAP has to be adjusted due to changes that have occurred on the ground;
- conflicts/disputes and grievances are properly and effectively redressed; and
- urgent decisions have to be made to resolve problems encountered during the implementation of the RAP.

Internal monitoring, also called performance and/or progress monitoring, is an internal management function allowing the Project management and other stakeholders to measure physical progress against milestones set out in the RAP in order to:

- i. ensure that due process has been followed with adequate public meetings being held;
- ii. verify that there are no outstanding or unresolved land acquisition issues regarding the Project, that the census, socio-economic surveys and asset inventories of all PAPs have been carried out, and that property valuation and resettlement have been undertaken in accordance with the provisions of the RPF;
- iii. maintain records of any grievances that require resolution;

- iv. oversee that all resettlement measures are implemented as approved by the Project management and relevant local authorities;
- v. verify that funds for implementing resettlement activities are provided in a timely manner, are sufficient for their purposes, and are spent in accordance with the provisions of the RPF;
- vi. document timely completion of all resettlement obligations (i.e. payment of the agreed-upon sums, construction of new structures, etc.) for all permanent and temporary losses, as well as unanticipated, additional construction damage, while updating the database with respect to any such changes; and
- vii. ensure that monitoring and evaluation reports are submitted.

7 GRIEVANCE REDRESS MECHANISM

The project implementation is likely to be affected by, and subject to complaints and grievances. As per the experiences from the Rural and Private Sector Development Project (RPSDP), some of these complaints and grievances may be justified while others are not; some may be captured by the regular M&E system while others may not; and some may be directly or indirectly related to project implementation while others may not be related to the project at all. In order to be able to address grievances and complaints in a more structured and pro-active manner, the project has developed an inclusive, well-designed, and effective Grievance Redress Mechanism (GRM) which is meant to help the project implementation team be more responsive to beneficiaries, thereby increasing trust and confidence among project stakeholders.

The GRM has the following building blocks and characteristics: (i) multiple grievance uptake locations and multiple channels for receiving grievances; (ii) service standards for grievance resolution; (iii) clear processing guidelines; and an effective and timely grievance response system to inform complainants of the action taken. The GRM is based on the following six core principles: (i) Fairness; (ii) Objectivity and Independence; (iii) Simplicity and Accessibility; (iv) Responsiveness and Efficiency; (v) Speed and Proportionality and (vi) Participatory and Social Inclusion.

The GRM has been developed as a separate instrument under the ESMF and its implementation will be informed by the lessons drawn from similar tools under RPSDP and WAAPP. Providing credible and accessible means for PAPs to pursue grievances allows the Project to address genuine issues in a timely manner and decreases the chances of resistance to the Project from disgruntled PAPs.

At the time the individual RAPs are approved and individual compensation contracts are signed, affected individuals and households should have been informed of the process for expressing dissatisfaction and seeking redress. The grievance procedure will be simple and will be administered as far as possible, at local levels to facilitate access by PAPs.

7.1 Objective

The objectives of the grievance process are to

- Provide affected people with avenues for making a complaint or resolving any dispute that may arise during the course of implementation
- Ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoid the need to resort to judicial proceedings.

7.2 Potential sources of grievances/disputes

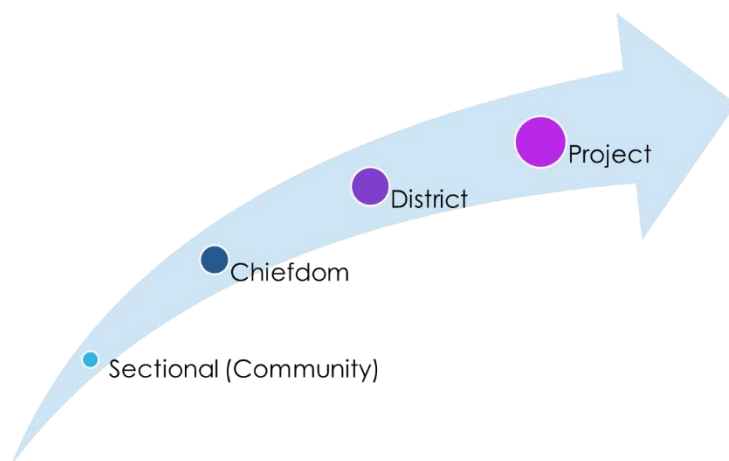
In practice, grievances and disputes that arise during the course of implementation of a resettlement/compensation program may be related to the following issues among others:

- Siting of the project/subproject;
- Mistakes in inventorying or valuing properties;
- Disagreement on property boundaries, either between the affected person and the expropriation agency or between two neighbours;
- Disputed ownership of a given asset (two or more affected people claim that the affected asset is theirs);
- Disagreement on asset valuation methods and compensation amounts in cash or in-kind;
- Successions, divorces, and other family issues resulting in disputed ownership or disputed shares between inheritors or family members;
- Disagreement with the computation of the resettlement or livelihood assistance or transportation cost;

- Claims by people who relocated on their own after receiving notification from the respective Districts about the project and the likelihood of impact on their activities; and
- Delays in resolving complaints of PAPs.

7.3 Grievance Redress Mechanism Structure and Committees

The SCADeP GRM is organized into four **Grievance Redress Committees (GRC)** at the Sectional (community), Chiefdom, District and Project levels. The membership of each committee is comprised of various key stakeholders, including local/traditional leaders, religious leaders, local government representatives, implementing partners and PCU. A complaint is raised with the relevant GRC for assessment and can be escalated to a higher level if the complainant believes their issue has not been adequately handled or resolved. Every GRC has a registrar who is the focal person for receiving, registering, processing and providing feedback to the affected person(s).



7.4 Grievance Redress Process

The general steps of the grievance process comprise:

- Uptake
- Processing
- Resolving
- Monitoring and Evaluation and Feedback

7.4.1 Uptake

The PCU will establish a register for resettlement/compensation related grievances and disputes. The receipt of complaints will include its logging and registration as this will help with monitoring the status of the grievances and ease reporting on them. The existence and conditions of access to this register (where, when, how) will be widely disseminated within the project community/town as part of the consultation undertaken for the project in general.

It is proposed that complaints related to resettlement/compensation be lodged verbally or in writing to the PCU Environmental and Social Safeguards Specialist (ESSS) designated to receive all complaints. The Sectional GRC for the project area can also receive complaints from PAPs (because the Sectional GRC is within the community and is closer to the PAPs and some PAPs may prefer to route their complaints through the Committee). The Committee will ensure that such complaints reach the PCU

ESSS designated to receive complaints within 24 hours via phone call or through any other means. The project will allocate budget to cover expenses necessary for the GRM to function effectively.

The PCU ESSS shall receive all complaints and shall officially register these complaints using the first section of the proposed complaint registration and resolution form (Annex 4). The PCU ESSS will inform the chair for the Project GRC within 24 hours on any complaint lodged.

7.4.2 Processing

When a grievance/dispute is recorded as per above-mentioned registration procedures, the relevant Grievance Redress Committee (GRC) will be called into action, and mediation meetings will be organized with interested parties. Minutes of meetings will be recorded.

The GRC will first investigate the eligibility of the grievance and then determine the redress action in consultation with the complainant and concerned party if necessary. Otherwise, the grievance redress committee will communicate to the complainant on the acknowledgement of the grievance, the redress action proposed and the timeframe for implementation.

The proposed redress action and the timeframe in which it is to be implemented will be discussed within 7 working days of receipt/registration of the grievance. The grievance issue should be resolved within 14 working days of receipt of complaints.

7.4.3 Resolving

The grievance redress committee will visit the affected property site or get in touch with the complainant to confirm that the redress action is carried out. If the complainant is dissatisfied with the outcome of the redress proposal or action, additional steps may be taken to resolve the issue or reach an amicable agreement. Verification should be completed within one week of execution of the redress action.

7.4.4 Monitoring and Evaluation

The GRCs have the responsibility of tracking and monitoring the process of grievance redress and the implementation of the decisions made, while ensuring redress is granted to the complainant in a timely and efficient manner with regular feedback on the process. All grievances and the decision-making process should be documented.

The PCU Monitoring and Evaluation Team should monitor the activities of the Grievance Redress Committees to ensure that complaints and grievances lodged by PAPs are followed-up and resolved amicably as much as possible. Also, annual evaluations of the GRMs overall effectiveness and impact should be performed to contribute to improving the performance of the different committees and provide valuable feedback to project management.

7.4.5 Dissatisfaction and Additional Steps

If the complainant is not satisfied with the decision of the grievance redress committee, he/she can escalate their grievance to the next GRC i.e. Sectional to Chiefdom, Chiefdom to District, District to Project level. If the complaint is related to unresolved compensation, the complainant can bring it to the attention of the PCU Environmental and Social Safeguards Specialist (ESSS) to draw the attention of

the PCU and Project GRC to the unresolved grievance. Otherwise, the relevant GRC should forward the unresolved issue directly to the next GRC for further action. The PCU in consultation with the Ministry of Agriculture and Forestry (MAF) safeguards representative, who is also the Chair of the Project GRC, will set up an appropriate mediation team to resolve the issue within 2 weeks from the date of receipt of the complaint. If such a time line is not possible, the PCU should inform the GRC and the complainant accordingly giving reasons and possible new date.

Appeal to Court

If the complainant remains dissatisfied with the mediation effort of SCADeP PCU and MAF safeguards representative, the complainant has the option to pursue appropriate recourse via judicial process in Sierra Leone. The Constitution allows any aggrieved person the right of access to a Court of Law. The Court of Law will be a “last resort” option, in view of the above mechanism.

7.5 Timeline for Grievance Redress and Institutional Responsibilities.

The table below presents a summary of the grievance redress procedure with institutional roles and responsibilities.

Table 3.1: Timeline for Grievance Redress

Steps	Process	Description	Time frame
1.	Grievance receipt and registration/ logging	-Face to face; phone; letter, recorded during public/ community meetings; recorded from Sectional Committee, Chiefdom Committee or District Committee etc. -Significance assessed and grievance recorded or logged using the model complaint form and filed. - PCU ESSS notified of logged grievance by Committee Secretary	1-2 Days
2.	Development and implementation of response	-GRC meets or takes a decision on the grievance -Grievance assigned to appropriate party for resolution if necessary -Response development with input from relevant stakeholders -Redress response/action approved by GRC and logged -Redress response/update of progress on resolution communicated to the complainant -Start implementing redress action	5-14 Days
3	Verifying the implementation of redress action	-Redress action implemented and verified by GRC. -GRC satisfied with implementation of redress action - PCU ESSS notified of redress action	7-14 Days
4	Close grievance or escalate to higher level GRC	-Completion of redress action recorded or logged -Confirm with complainant that grievance can be closed or determine what follow up is necessary -Record final sign off of grievance If grievance cannot be closed, escalate to higher level	15-25 Days

Steps	Process	Description	Time frame
		GRC or with PCU Project level GRC directly - PCU ESSS receive regular updates on the progress and redress of the grievance registered	
5	Court of Law	-if escalation to higher GRC does not address dispute, complainant can resort to court of law	Unknown
6	Monitoring and Evaluation and reporting	Grievance Redress Mechanism Process is documented and monitored by GRC and PCU ESSS and M&E	-

7.6 Current Status of SCADeP GRM

SCADeP has Grievance Redress Committees (GRCs) set up and active on all four levels including Project, District, Chiefdom and Sectional levels. The District level GRCs have been established in 13 out of 15 districts, excluding Western Area Urban where the project does not operate. The remaining two new districts Falaba and Karene were established in mid-2018 and will have GRCs set up once all required staff positions have been filled, such as Civil Works Engineer and Environmental and Social Officer.

The Chiefdom and Sectional level GRCs created during the GAP roads implementation, from October 2017 to August 2018, are now inactive as project activities in the area are complete and the rehabilitated feeder roads have been handed over to the communities and respective District Councils. New project areas will go through a similar process of setting up a local GRC and receiving support and continuous engagement throughout the project activity.

Closer attention is required during the initial step of 'Uptake', as not all grievances are logged or documented due to a variety of reasons. Some issues are solved through undocumented discussions between the aggrieved person and community elders, traditional leaders or Contractors. Gaps in consistently logging all grievances (resolved or unresolved) in the project GRM would make the project GRM ineffective. Solutions to overcome this should aim at improving the uptake of grievances and ensuring the GRM is adequately utilized.

8 VULNERABLE GROUP CONSIDERATION

8.1 Identification of Vulnerable Groups

Vulnerable groups are those at risk due to the displacement, compensation, and resettlement process. Vulnerable persons need to be identified in the preparation of the Resettlement Action Plan (RAP) or Abbreviated Resettlement Plan (ARAP) when project scope and activities are determined. Vulnerable people to be considered under the SCADeP include:

- The elderly, usually from 70 years and above;
- Widows;
- Women and children;
- Physically challenged persons;
- Mentally challenged/highly depressed persons;
- Affected Persons who are too ill, bedridden, hospitalized or stricken with HIV/AIDS;
- Unemployed youth;
- Female/child heads of households; and
- Migrant/settler farmers without proper land documents.

8.2 Assistance to Vulnerable People

Assistance to vulnerable persons may take various forms and may also depend upon vulnerable persons' requests and needs. Assistance to vulnerable people may include, but not limited to the following:

- Assistance in financial literacy training, especially for women
- Assistance in compensation payment procedures;
- Assistance in the post payment period to secure the compensation money and reduce risks of misuse/robbery;
- Assistance in moving: providing vehicle, driver and assistance at the moving stage;
- In kind compensation payment,
- Vulnerable farmers whose land is taken for purposes of demonstration farms should be assisted with initial clearance of the alternative farmland of similar size,
- Assistance to migrant/settler farmers without proper land documents in finding alternative sites for farming;
- Assistance in construction of houses through providing materials, workforce, or construction and
- Assistance for accessing health care services if required especially during moving and transition.

8.3 Provisions to be made in RAP/ARAP

Vulnerable people will be identified at census stage. Each RAP or ARAP developed under the SCADeP if any should make precise provisions with respect to assistance to vulnerable groups. Identification of vulnerable people and identification of the cause and impacts of their vulnerability, either through direct interviews by the RAP/ARAP consultant, PCU Environmental and Social Safeguards Specialist or the District Agricultural Officers (Extension Officers) at the project inception stage or RAP/ARAP stage is critical because often vulnerable people do not participate in community meetings, and their

disability/vulnerability may remain unknown. Local community leadership should be involved in the determination of who is vulnerable and by what criteria.

8.4 Gender Issues and Gender-based Violence

Women's participation in local governance is still a challenge; there are very few female paramount chiefs in the 16 Districts of Sierra Leone while the number of female councillors is also insignificant. The culture in the project area is based on patrilineal tendencies. This male dominance phenomenon often places women as second-class citizens.

8.4.1 Women in Development

Women provide more than 65% of the work force in food and agricultural production in Sierra Leone. The contributions of women to agriculture have nevertheless been under represented, a major reason for their neglect by most agricultural development programmes in the country over the years. Thus, women are marginalized and constrained in their access to production resources and extension services, which adversely affects their farming activities. In order to redress this situation, women and their needs must be mainstreamed in development, not only because of equity concerns but also from the realization that sustainable development cannot be achieved if the women are left in the fringes of development efforts.

As is common in Sierra Leone there is a clear division of labour between men and women: women are engaged in all aspects of agriculture and cultivation except in physically demanding jobs, such as land clearing and digging. In addition to this, women are dominant players in the cultivation of vegetables and other crops.

Women have additional responsibilities in the preparation of food for the family and caring for the younger members of the family. Food preparation is tedious and time consuming and involves collection of wood, water and vegetables.

Gender-based Violence and Violence Against Women

The prevalence of sexual and gender-based violence (SGBV) incidences in post conflict Sierra Leone poses a serious challenge in the advancement of women's rights. SGBV issues such as rape, wife beating, sexual harassment and molestation, forced marriages and wife inheritance continue to be a daily occurrence. A number of ongoing interventions by government and various organizations, notably, the Family Support Unit of the Sierra Leone Police, Rainbow Homes for Survivors, Irish Aid, IRC, ActionAid and UN agencies, like UNICEF, UNFPA and many others are providing important support to address the problem of SGBV.

In SCADeP, GBV and VAW related impacts are potential issues during the construction phase affecting vulnerable groups, such as female farmers. During the construction and operational phase, the project will attract men and women looking for employment, as well as local vendors and sellers. This will most likely increase project-related risks, such as the impact of having higher earnings by workers relative to people around the area, women and girls exposed to risky activities due to extreme poverty and the prevalence of child labor. Also, working in close proximity with local communities some of the interactions may lead to insensitive behaviour and relationships, including some that are disrespectful of local culture and others fostering and/or directly resulting in gender-based violence (GBV, sexual harassment, etc.).

Avoiding such adverse social impacts is a shared responsibility of both the contractor and supervising consultant. The Contractor has the onus of ensuring employees are sensitive to and respectful of local cultures and upholding an acceptable standard of behaviour when interacting with outsiders and local communities; and the Supervising Consultant and Engineers need to be vigilant and report any cases of GBV, sexual harassment and child labour during construction. Sierra Leone's obligations as a party to the UN Convention on the Rights of the Child, and the Convention for Eliminating Discrimination Against Women (CEDAW), requires that acceptable standards of behaviour are made understood by

all parties involved, encouraged through various ways with enforceable measures for ensuring accountability for non-compliance agreed to.

SCADeP will address GBV and VAW issues through mainstreaming of GBV and VAW codes of conduct and training to increase the protection of women and children. By training the relevant implementing partners and works supervisors, the occurrence of GBV if observed during construction and project activities will reduce.

8.4.1.1 Mitigation Measures

- Ensure gender equity during employment and encourage women employment in skilled roles not only unskilled roles, such as supervision, operating machinery and traffic management.
- Codes of Conduct for contractors and workers on their obligations regarding sexual exploitation and abuse (SEA) and sexual harassment (SH), trainings for construction workers on their obligations and behaviors on these topics to be signed by workers and contractors,
- Awareness raising to communities on SEA risks and the different entry points to provide support to potential survivors of SEA and SH derived from the project,
- Working with gender and GBV Ministry departments, such as Gender in Agriculture and Nutrition in MAF and NGOs to sensitize project implementing partners on the signs and support available for survivors,
- Prohibit recruiting child labour.

Grievance redress for GBV

The PCU GRM will designate specific contact for reporting GBV. Reporting could be unanimous and information on complainant will be held confidential. GRM will outline survivor centered procedures for addressing GBV complaints. These will include support for accessing services, such as counselling, health services and other supports as required. The project will work with service providers in project area to make arrangements to secure these services when needed. Sufficient budget should be allocated for implementation.

9 CONSULTATIONS AND DISCLOSURE

9.1 Stakeholder Consultations

Stakeholders for the purpose of this project shall be defined as all those people and institutions that have an interest in the successful planning and execution of the project. This includes those likely to be directly and indirectly affected by the project. The key stakeholders consulted in relation to the Additional Finance and Component 2: Market Access Improvement, included implementing partners, project beneficiaries and project affected persons are:

- Ministry of Agriculture and Forestry
- Ministry of Local Government and Rural Development
- Ministry of Lands, Country Planning and the Environment
- National Federation of Farmers in Sierra Leone (NAFFSL)
- Sierra Leone Women Farmers Forum (SLWoFF)
- Road Maintenance Fund Administration (RMFA)
- Sierra Leone Roads Authority (SLRA)
- EPA-SL
- City and District Councils
- Communities along the feeder roads.

The PCU engaged key stakeholders and implementing partners on April 5th, 2019, to discuss the Additional Finance of \$30 million from the World Bank to SCADeP under Ministry of Agriculture and Forestry (MAF) for additional activities under Component 2: Market Access Improvement. As part of the process leading to the disbursement, SCADeP was required to update its existing Resettlement Policy Framework (RPF) and Environmental and Social Management Framework (ESMF) and conduct stakeholder engagements to disclose the updated documents and project activities to stakeholders for discussion and comments before finalising the documents.

Both the RPF and ESMF were discussed and key stakeholders related to Component 2 shared their comments and concerns. The key stakeholders in attendance were both national farmer organisations, National Federation of Farmers in Sierra Leone (NAFFSL), the Sierra Leone Women Farmers Forum (SLWoFF), Road Maintenance Fund Administration (RMFA), Sierra Leone Roads Authority (SLRA), Ministry of Agriculture and Forestry (MAF) and Ministry of Local Government and Rural Development (MLGRD). During the meeting at the PCU, the main issue raised was gender and GBV. The gender representatives from MAF noted that practical steps must be taken to ensure gender participation in the road works and maintenance and that mechanisms should be put in place to ensure GBV issues are not experienced during implementation. Therefore, provision should be made in the budget for training of rural women to enhance their participation and also on GBV issues. GBV issues have been incorporated in the updated RPF and ESMF, including a GRM for GBV issues and training on GBV for implementing partners and local communities along the project roads. The outcome of the consultation meeting is provided in Annex 5.

Previous stakeholder consultations were conducted for the Environmental, Social and Health Impact Assessment (ESHIA) for 500km feeder roads, which has been disclosed and similar consultations were held for the Spot Improvement ESHIA, which has been submitted to the Regional Safeguards Advisor

(RSA) for clearance. The Consulting firm for 500km feeder roads project conducted extensive stakeholder consultations in thirteen districts across Sierra Leone over a period of three weeks in February 2018 to cover all the local communities along the project roads. Meetings were held with the various stakeholders along the project feeder roads and with District and City Councils. The findings from these consultations are in Annex 6. The issue of potential resettlement was discussed, however as the project scope is to rehabilitate existing feeder roads and the Consultant data collection did not identify any houses and plantations obstructing the right of way (ROW); the communities consulted did not feel resettlement was a potential issue to them and focused more on local employment generation during construction and the sustainability of the roads post-construction.

Stakeholder consultation or engagement is a continuous process and SCADeP PCU will continue with the engagements throughout the project implementation phase. As additional roads and bridges are identified the local PAPs will be duly consulted and a new ESHIA or the necessary safeguards instruments will be prepared and publicly disclosed.

9.2 Consultation and Disclosure Requirements for the Resettlement Policy Framework

The resettlement instrument will be disclosed in compliance with World Bank Operational Policy, OP 4.12, which states that:

” As a condition of appraisal of projects involving resettlement, the borrower provides the Bank with the relevant draft resettlement instrument which conforms to this policy, and makes it available at a place accessible to displaced persons and local NGOs, in a form, manner, and language that are understandable to them. Once the Bank accepts this instrument as providing an adequate basis for project appraisal, it will be public disclosed across country and copies also deposited at selected locations for accessibility. The approved document will also be disclosed on the website of the World Bank.”

The consultations and public Disclosure will be undertaken by the PCU of SCADeP and will be organized as follows:

- Circulation of the draft RPF for comments to all relevant institutions (e.g. PCU, relevant Ministries and agencies involved with SCADeP, Environmental Protection Agency, and the World Bank;
- Communication of comments to the PCU for incorporation into a final RPF, together with World Bank comments; and
- Public Disclosure of final RPF (after reviewed and cleared by both GoSL & World Bank) both in-country (e.g. relevant District Councils, District/National MAF offices, District EPA offices, project communities), national newspapers and on the World Bank and SCADeP websites during April 2019.

10 BUDGET FOR RPF

10.1 Estimated Budget to Implement RPF

The estimated budget for implementing the RPF is presented in table below. The RPF will be the basis for the preparation and implementation of RAP/ARAP where required.

Table 4-1: Estimated Budget for RPF Implementation

No.	Activity	Description	Item	Unit cost, US\$	No	Total Cost, US\$
1.0	Training and Sensitization/ Awareness Creation	MAF (relevant directorates and other national stakeholders)	Workshop	4,000.00	1	4,000.00
		Farmers, District Agricultural Offices, District Councils	District Workshops (for 16 rural Districts)	2,000.00	16	32,000.00
		FBOs, CSOs, NGOs and Contractors	District Workshops (for 16 rural Districts)	2,000.00	16	32,000.00
		Potential PAPs in the project area	Public meetings in communities	1,000.00	-	1,000.00
		Radio Discussions	Local radio stations	1,000.00	-	1,000.00
2.0	RPF Disclosures	Disclosure of RPF - Advertisements	National Newspapers	Lump sum (LS)	-	2,000.00
		Disclosure of RPF – copies to stakeholders	All relevant stakeholders	Lump sum (LS)	-	2,000.00
3.0	External Monitoring and Evaluation	Local Consultant	Lump sum fees	6,000.00	1	6,000.00
4.0	Resettlement Process	Logistics, Valuation Surveys and Preparation of instrument	Site visits, valuation of properties, public consultations etc	LS	-	10,000.00
5.0	Completion Audit	Local Consultant	Lump sum fees	5,000.00	-	5,000.00
6.0	TOTAL					95,000.00

10.2 Budget for Preparation and Implementation of RAPs/ARAPs

The budget will be developed from the specific social surveys and mitigation/livelihood restoration measures to be developed under the preparation of the ARAP or RAP. It will cover resettlement activities including compensation cost for affected assets.

The cost will be derived from expenditures relating to (1) the preparation of the resettlement instrument, (2) relocation and transfer, (3) income losses and livelihood restoration plan, and (4) administrative costs. These bullet points give the cost centres:

- (1) Preparation of resettlement instrument (e.g. ARAP or RAP)

- Cost of survey of affected persons, valuation and inventory of assets
- Compensation payments for affected assets
- Fees of consultants/NGO to be engaged

(2) Relocation Issues, if relevant

- Cost of moving and transporting items
- Cost of site and infrastructure development and services
- Subsistence allowance during transition
- Cost of replacement of businesses and downtime

(3) Income and means of livelihood restoration plans

- Cost of estimating income losses and livelihood assistance

(4) Administrative costs

- Operation and support staff
- Training and monitoring
- Technical assistance

Table 4.2 is a template for the itemization of budgets to be prepared under the resettlement plans with mainly cash compensation in mind. No resettlement housing is included. The template could be modified to suit local situation.

Table 4-2 Itemization of budget

#	ITEM	SLL
1.0	PREPARATORY PHASE COST	
1.1	Inventory of affected persons, assets and livelihoods	
1.2	Valuation fees (MLCPE or private valuer)	
1.3	Preparation of resettlement plans or compensation reports	
1.4	<i>Subtotal 1 (Preparatory phase cost)</i>	
2.0	COMPENSATION COST	
2.1	Compensation for permanent acquisition of land	
2.2	Compensation for temporary occupation of land	
2.3	Compensation for destruction of standing crops	
2.4	Compensation for destruction of permanent immovable structures	
2.5	Compensation for temporary displacement of moveable structures	
2.6	<i>Subtotal 2 (Compensation cost)</i>	
3.0	LIVELIHOOD RESTORATION /MITIGATION MEASURES COST	
3.1	Compensation for PAPs loss of income	
3.2	Compensation for business persons loss of income	
3.3	Cost of special assistance to vulnerable persons	
3.4	<i>Subtotal 3 (Livelihood restoration/mitigation cost)</i>	

#	ITEM	SLL
4.0	CAPACITY BUILDING & IMPLEMENTATION COST	
4.1	Capacity building for key stakeholders	
4.2	Disclosure of resettlement instrument	
4.3	Logistical support and engagement of Safeguard Officer	
4.4	Cost for compensation disbursement/grievance redress/monitoring & evaluation activities	
4.5	Legal fees (in case of court dispute)	
4.6	Subtotal 4 (Capacity building & implementation cost)	
5.0	MONITORING AND EVALUATION	
5.1	Logistical support for Monitoring and Evaluation Officer	
5.2	External monitoring	
5.3	Subtotal 5 (Monitoring and Evaluation cost)	
6.0	TOTAL COST (addition of all subtotals)	
7.0	CONTINGENCY (5%-10% OF TOTAL COST)	
8.0	GRAND TOTAL COST (Total Cost + Contingency)	

10.3 Sources and Arrangements for funding

According to its Involuntary Resettlement policy (OP 4.12), *“the Bank does not disburse against cash compensation and other resettlement assistance paid in cash, or against the cost of land (including compensation for land acquisition). However, it may finance the cost of land improvement associated with resettlement activities.”*

Compensation, land acquisition and resettlement related issues will be funded by the Government of Sierra Leone. The Ministry of Finance is expected to make funds available to the sector ministry i.e. the Ministry of Agriculture and Forestry (MAF) for the payment of compensation.

11 ANNEX

Annex 1 – Land Acquisition Assessment Form

The Tool

Date: _____

Home of the Assessor _____

Title of the Assessor _____

Affiliation _____

Name of the site _____

Location (Village, town, city, and county) _____

Size of the Project site: _____

Status of the Project site _____

(i) Public land with no use: _____

(ii) Public land with leased: _____

(iii) Community Land: _____

(iv) Individual land: _____

(v) Public land but squatted: _____

(vi) Other status (specify): _____

If public land with lease:

(i) Who is using the land (provide the name of the beneficiary and duration of the lease): _____

(ii) What is the land used for? _____

(iii) Is there any infrastructure? Yes No

(iv) If yes, specify: _____

If community land

(i) What is the current use of the land? _____

(ii) Who is currently using the land? _____

(iii) Is there any infrastructure? Yes No

(iv) If yes, specify: _____

If individual private land:

(i) Identify the owner: _____

(ii) What is the current use of the land? _____

(iii) Who benefits presently from the land? (owner or leased to someone else)

(iv) Is there any infrastructure? Yes No

(v) If yes, specify: _____

If collective private land

- (i) Who is the owner/s? _____
- (ii) What is the current use of the land? _____
- (iii) Who benefits presently from the land? (owner or leased to someone else?)

- (iv) Is there any infrastructure? Yes No
- (v) If yes, specify: _____

If public land but squatted:

- (i) Who are the squatters (name, identify, and where she/he or they come from)?

- (ii) What is the use of the land? _____
- (iii) Is there any infrastructure put in place by the squatters? Yes No
- (iv) If yes, specify: _____

If other

- (i) What is land used for? _____
- (ii) Who uses it? _____
- (iii) Is there any infrastructure? Yes No
- (iv) If yes, Specify: _____

Conclusion/Recommendation:

The Assessor provides recommendation based on the findings:

Land is free of claims; it is public with no use; state that the project can go ahead:

If public land but leased, the Assessor should recommend that the beneficiaries must get another lease or different site before the project status

If Community land or individual private land or collective private land and the owners are donating the site on a voluntary basis, the Assessor should recommend that owner (s) provide legalized and signed document showing their good will to donate the land before the project status: _____

If community land or individual private land or collective private land and the owner (s) or some of the owners are not willing to give the land Voluntary or somehow unhappy, then the Assessor should recommend that the project be held back until the problem is solved or an alternative site with no claims is provide: _____

If public land is squatted, the Assessor should recommend the project to be held back until a suitable solution found for the squatters including helping them find another place to settle: _____

The Assessor could provide any other useful recommendation (s) including for land with other status: _____

Signature of the Assessor _____

- (i) Date: _____

Signature of Government Official: _____

- (i) Official _____ Seal:

(ii) Data: _____

Annex 2 – Resettlement Action Plan (RAP)

A Resettlement Action Plan (RAP) should include, at a minimum, the elements outlined below in reference to OP 4.12, Annex A:

1. Description of the sub-project and of its potential land impacts
 - 1.1 General description of the project and identification of the project area
 - 1.2 Potential impacts. Identification of
 - 1.2.1 Project component or activities that give rise to resettlement;
 - 1.2.2 Zone of impact of such component or activities;
 - 1.2.3 Alternatives considered to avoid or minimize resettlement; and
 - 1.2.4 Mechanisms established to minimize resettlement, to the extent possible, during project implementation.

2. Objectives.

The main objectives of the resettlement program

3. Socio-economic studies and census of affected assets and affected livelihoods.

The findings of socio-economic studies and census to be conducted with the involvement of potentially displaced people include:

- 3.1 The results of a census survey covering current occupants of the affected area to establish a basis for the design of the resettlement program and to exclude subsequent inflows of people from eligibility for compensation and resettlement assistance;
- 3.2 Standard characteristics of displaced households, including a description of production systems, labour, 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;
- 3.3 The magnitude of the expected loss—total or partial—of assets, and the extent of displacement, physical or economic.
- 3.4 Information on vulnerable groups or persons as provided for in OP 4.12, para. 8, for whom special provisions may have to be made;
- 3.5 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.
- 3.6 Other studies describing the following
 - 3.6.1 Land tenure 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 project area;
 - 3.6.2 The patterns of social interaction in the affected communities, including social

networks and social support systems, and how they will be affected by the project;

3.6.3 Public infrastructure and social services that will be affected; and

3.6.4 Social and cultural characteristics of displaced communities, including a description of formal and informal institutions (e.g. community organizations, ritual groups, non-governmental organizations (NGOs)) that may be relevant to the consultation strategy and to designing and implementing the resettlement activities.

4. Legal and Institutional Framework.

4.1 Summary of the information included in this RPF

4.2 Local legal specificities if any

4.3 Local institutional specificities

4.3.1 Identification of agencies locally responsible for resettlement activities and NGOs that may have a role in project implementation;

4.3.2 Assessment of the institutional capacity of such agencies and NGOs; and

5. Eligibility and Entitlements.

Based on the definitions and categorization in this RPF (see entitlement matrix), definition of displaced persons and criteria for determining their eligibility for compensation and other resettlement assistance, including relevant cut-off dates.

6. Valuation of and compensation for losses.

The methodology to be used in valuing losses to determine their replacement cost; and a description of the proposed types and levels of compensation under local law and such supplementary measures as are necessary to achieve replacement cost for lost assets.

7. Resettlement measures:

7.1 Description of the packages of compensation and other resettlement measures that will assist each category of eligible displaced persons to achieve the objectives of the policy (see OP 4.12, para. 6).

7.2 Site selection, site preparation, and relocation. Alternative relocation sites considered and explanation of those selected.

7.3 Legal arrangements for regularizing tenure and transferring titles to resettlers.

7.4 Housing, infrastructure, and social services.

7.5 Environmental protection and management.

7.6 Community participation. Involvement of resettlers and host communities

7.7 Integration with host populations. Measures to mitigate the impact of resettlement on any host communities

7.8 Specific assistance measures intended for vulnerable people, to be identified for

instance amongst those listed in section 8 of the RPF.

8. Grievance procedures.

Based on the principle mechanisms described in this RPF, description of affordable and accessible procedures for third-party settlement of disputes arising from resettlement; such grievance mechanisms should take into account the availability of judicial recourse and community and traditional dispute settlement mechanisms.

9. Organizational responsibilities.

The organizational framework for implementing resettlement, including identification of agencies responsible for delivery of resettlement measures and provision of services; arrangements to ensure appropriate coordination between agencies and jurisdictions involved in implementation; and any measures (including technical assistance) needed to strengthen the implementing agencies' capacity to design and carry out resettlement activities; provisions for the transfer to local authorities or resettlers themselves of responsibility for managing facilities and services provided under the project and for transferring other such responsibilities from the resettlement implementing agencies, when appropriate.

10. Implementation schedule.

Based on the template presented in the RPF, present an implementation schedule covering all resettlement activities from preparation through implementation, including target dates for the achievement of expected benefits to resettlers and hosts and terminating the various forms of assistance. The schedule should indicate how the resettlement activities are linked to the implementation of the overall project.

11. Costs and Budget.

Tables showing itemized cost estimates for all resettlement activities (see Section 10 of this RPF), including special assistance to vulnerable persons and other contingencies.

12. Monitoring and Evaluation.

Arrangements for monitoring of resettlement activities by the implementing agency, supplemented by independent monitors as considered appropriate by the Bank, to ensure complete and objective information; performance monitoring indicators to measure inputs, outputs, and outcomes for resettlement activities; involvement of the displaced persons in the monitoring process; evaluation of the impact of resettlement for a reasonable period after all resettlement and related development activities have been completed; using the results of resettlement monitoring to guide subsequent implementation.

Annex 3 – Abbreviated Resettlement Action Plan (ARAP)

An Abbreviated Resettlement Action Plan (ARAP) should include, at a minimum, the elements outlined below:

1. Description of the Project Sub-Projects
 - 1.1. Sub-Project Land Needs
 - 1.2. Land Needs Justification and Minimization
2. Census Survey of Displaced Persons and Valuation of Assets
 - 2.1. Methodology
 - 2.2. Results
3. Affected Assets
4. Socio-Economic Features and Affected People's Livelihoods
5. Description of Compensation and Other Resettlement Assistance
6. Consultation with Displaced People
7. Procedures for Grievance Redress
8. Monitoring and Evaluation
9. Institutional Responsibilities and Arrangements for Implementation
10. Timetable, Budget and Funding Arrangements

Annex 4 – Terms of Reference (TOR) for Resettlement Management Teams

Terms of Reference: Compensation Team

1.0 Objective of the Team:

The Compensation Team will be responsible for organizing and ensuring that compensations due or payable to PAPs are made in line with the provisions and procedures of this RPF.

2.0 Duties and Responsibilities:

The Compensation Team will take overall management of:

- conducting extensive consultations to the affected project sites
- identifying the PAPs and establishing their eligibility and entitlement based on this RPF
- providing due diligence to ensure the compensation is given to the rightful owner(s)
- the valuation of assets and compensation owed to PAPs
- preparing a compensation report and the relevant contracts for the claimants
- keeping the PCU and ESSS regularly informed about the compensation process and raising any issues when necessary
- ensuring the full payment of each claimant.

3.0 Qualification and Experience

The Compensation Team members should have:

- at least 5 years in compensation and asset valuation related activities
- completed similar assignments related to agriculture and rural development
- great knowledge of the rules and types of compensation available
- aware of the current market value of assets
- proven track record in working effectively within a multidisciplinary team.

Terms of Reference: Grievance Redress Team

1.0 Objective of the Team:

The Grievance Redress Team will be responsible for receiving and logging complaints and resolving disputes. The team will undertake follow-ups on all measures taken to resolve each grievance or dispute to ensure that redress actions are implemented by whoever is mandated to undertake such action.

2.0 Duties and Responsibilities:

The Grievance Redress Team will take overall management of:

- following the grievance redress process outlined in section 7.4
- conducting awareness raising of the GRM in the affected resettlement sites
- amicably resolving grievances raised by Aggrieved Parties (APs) during the resettlement process
- preventing uncontrollable tensions or temper explosions that may occur in the absence of a transparent redress mechanism
- assuring transparency and accountability during the resettlement process
- making the project more responsive to concerns raised by PAPs

- escalating any complaints as necessary.

3.0 Qualification and Experience

The Grievance Redress Team members should have:

- experience in recording and resolving grievances
- completed similar assignments related to agriculture and rural development
- great knowledge of implementing a GRM
- proven track record in working effectively within a multidisciplinary team.

Terms of Reference: Monitoring and Evaluation Team

1.0 Objective of the Team:

The Monitoring and Evaluation Team will be responsible for the monitoring of the resettlement instrument implementation to ensure that stated targets are met and project affected persons are duly compensated in line with the provisions in the resettlement instrument.

2.0 Duties and Responsibilities:

The Monitoring and Evaluation Team will take overall management of:

- establishing a database for the resettlement process, including locations, PAPs, compensation amounts and status of payment
- ensuring appropriate monitoring and evaluation are established, implemented and coordinated;
- liaising closely with the other resettlement teams and relevant stakeholders for data collection and dissemination;

3.0 Qualification and Experience

The Monitoring and Evaluation Team members should have:

- at least 5 years' experience in Statistics, M&E or a relevant discipline
- completed similar assignments related to agriculture and rural development
- great knowledge in data processing and analysis packages
- excellent computer skills
- proven track record in working effectively within multidisciplinary teams.

Annex 5 – Compensation Claim and Commitment Form

SMALLHOLDERS COMMERCIALIZATION AND AGRIBUSINESS DEVELOPMENT PROJECT

-COMPENSATION CLAIM FORM-

Affected Person Information:

Name of claimant: Sex:

Age:

Name of Representative/Contact Person:

.....

District: Town:

Community/Village:

Affected property:

.....

Total Compensation Due:

Affected property value (SLL)	Disturbance (SLL)	Livelihood assistance (SLL)	Other supplementary assistance as necessary (SLL)	Total compensation (SLL)

Compensation Payment Commitment:

I,, having received the above total compensation amount for the land required/structures/crop(s) at the project site in question on(i.e. date of compensation payment), have agreed in principle to vacate or release the said land(s), for which compensation has been paid for the crops/structures/land thereon, on(agreed date when PAP should vacate or release the land).

Signature or Thumb print of claimant /recipient:

Date:

Name of Administrator (MAF/Project Representative):

Signature of Administrator:

Date:

Contact of Administrator:

Name of Witness:

Signature of Witness

Contact of Witness:

Annex 6 – Sample Grievance and Resolution Form

(To be used for recording Complaints and Resolution Discussions)

A. COMPLAINT RECORDING

Name of Affected Person (s): _____

ID Number: _____ (Complaint ID number)

Contact Information : _____ (Village ; mobile phone)

Nature/Summary of Grievance or Complaint:

Name of Person Filing Complaint: _____ (if different from AP)

Position or Relationship to Affected Person: _____

Name of Person Recording Complaint: _____

Signature: _____

RECORDER

Signature: _____

COMPLAINANT

Date _____

Date: _____

B. REVIEW/RESOLUTION

Date of Conciliation Session: _____

Was Complainant Present (if different from AP)? Yes No

Was Affected Person Present? Yes No

Was field verification of complaint conducted? Yes No

Summary findings of field investigation:

Summary of Conciliation Session Discussion:

Issues:

Was agreement reached on the issues? Yes No

If agreement was reached, detail the agreement below:

If agreement was not reached, specify the points of disagreement below and proposed next steps:

Signed: _____
CHAIRMAN, CONCILIATING MEETING

Signed _____
AFFECTED PERSON

Signed: _____
INDEPENDENT OBSERVER

Date: _____

Annex 7 – Outcome of Stakeholder Consultation at PCU

Key Issues Raised in the Meeting held at SCADeP PCU on April 5th, 2019:

1. **Provision of Maintenance and the Role of Road Maintenance Fund Administration (RMFA).** The issue of maintenance of feeder roads as one of the challenges facing beneficiaries was discussed. The project team assured participants that the design of the project includes maintenance to ensure sustainability and the RMFA is on-board to ensure continuity once the project fades out.
2. **Project life time.** Participants raised concern on whether the activities under the additional financing will be completed by the end of the project life such that uncompleted activities will not become environmental and social burden. The project team assured that carefully planning and effective implementation plan have been developed to ensure delivery of project out put on time.
3. **Gender and GBV-** The gender representatives from MAF noted that practical steps must be taken to ensure gender participation in the road works and maintenance. Furthermore, mechanism should be put in place to ensure GBV issues are not experienced during implementation. Therefore, provision should be made in the budget for training of rural women to enhance their participation and also on GBV issues. GBV issues have been incorporated in the updated RPF and ESMF, including a GRM for GBV issues and training on GBV for implementing partners and local communities along the project roads.
4. **Revision of MAP.** The map of Sierra Leone used in the ESMF is the old one. This should be replaced by the new map. This has been replaced with the updated map illustrating the 16 districts.
5. **Positive Impacts of Feeder Roads Rehabilitation and Maintenance.** The document should state clearly the potential positive impacts of the road construction and maintenance in the Impact Identification and Mitigation Section of the ESMF. This has been included in the updated ESMF.

Attendance:

The consultation meeting was attended by all the major stakeholders and implementing partners of the road project as per the attached attendance register.

Name	Designation	Institution
Brima Babo	National Coordinator & Focal Person	NaFFSL
Manjay Sankoh	Director	RMFA
Mohamed Bah	Deputy Director	RFMA
Alie Forna	Senior Civil Engineer	RFMA
Mariama M. Turay	Head, Gender in Agric. & Nutrition	MAF
Oya Josephine Kargbo	President	SLeWoFF
Jesse O. John	President	NaFFSL
Adul N. Fofanah	Engineer	SLRA/SCADeP
Adolphus Jackson	Technical Adviser	SCADeP
Usif R. Sesay	Project Accountant	SCADeP
Tamba Kanje	Civil Engineer	MAF
Michael A. Samia	Director of Rural Development	MLGRD
Alimamy Kargbo	Grants Manager	SCADeP

Photos of the Consultation



Annex 8 – Outcome of Stakeholder Consultations with PAPs

Outcomes of Stakeholder Consultation Process conducted during February 2018 across the 13 districts of 500km feeder roads project (Source: Final ESHIA Report for 500km feeder roads)

Employment

It was the wish of the stakeholders that priority of employment opportunities for skilled, semi-skilled and unskilled labour be given to the local residents. However, the locals were informed that if the local residents do not have adequate or none at all of the skilled labour, then these can be sourced from outside their district or region. Moreover, they should know that priority for labour intake will be given to them but they should accept Sierra Leoneans from other regions with prerequisite skills that will be employed on the project since they are one people.

Potential for increased economic activities

The residents are optimistic that upon completion of the project roads, more opportunities for business will be realized. Completion of the project will attract more investors/ traders and increase in business activities among the residents because it will be easy to transport goods from villages to other villages/ towns in their Region /districts. This means that the returns from sales of agricultural goods to the residents will be higher than the current case.

Reduction of travel time

Another additional benefit will be improved transport services as improvement of the selected roads will increase attraction of the nearby settlements to use the project roads to get to different destinations and districts headquarter towns. This in return, will ensure that people save time and it also means that costs of travel from remote settlements to the other settlements will be lowered because of shorter time taken to travel and improved road network.

Long-term sustainability

Most of the stakeholders requested that the proposed project should not lead to environmental degradation (e.g. hard wood cutting in Koinadugu District) and require that comprehensive assessment of potential impact areas be carried out. Moreover, they were concerned about the maintenance regime of such roads once they were completed. However, in addressing this issue the consultant informed participants that they still have an opportunity to incorporate this into the CDAP for their respective areas once the contractors have been commissioned and there is an allocation for capacity building which will ensure that the local youths take over the maintenance of these project roads.

Poor drainage and flooding

The stakeholders raised issue of poor drainage in the area due to heavy trucks plying their routes in search of agricultural goods and hard wood especially in Koinadugu, Kailahun and Pujehun districts respectively. This situation resident noted that the culvert points flood during heavy rains and makes crossing such sections impossible. They proposed that the project should address the poor drainage facilities in their areas to allow accessibility throughout the year and reduce flooding issues in the affected sections of the roads. The stakeholders were informed that the issue of drainage has been addressed in the design.

Health and Safety

The stakeholders were concerned about safety hazards related to operation of construction equipment and machinery, which could lead to injuries or loss of life for the workers. The stakeholders were informed that measures to mitigate potential health and safety hazards has been provided in the ESMP which include enforcing speed limits, inspection of machinery, training of machinery safety, provision of adequate safety signage and wears among others.

Photos from Consultations



Public Consultation with residents along the feeder road in Kambia



Residents in Kowubu village



Consultation with locals at Jormu Kafeibu along the Combema

Attendance Lists:

The consultation meetings in the various communities were attended by the Town Chiefs, elders, women and youth. All residents use the project roads to access their farmers, other towns and public services like health centres and schools.



Vaahun - Comfema Road



REHABILITATION OF 500Km FEEDER ROADS IN 14 DISTRICTS

ATTENDANCE LIST FOR PUBLIC PARTICIPATION

Date: 14/03/19

Location: Joromo Kafeibu/Karoma

Venue: Joromo Kafeibu

No.	Name	Organization	Contact	Signature
1	Abdulai Kemolai			
2	Chife-fayia Yafoi	JOROMO KAFEIBU		
3	Saidu Kijana	JOROMO KAFEIBU		
4	John Brima	JOROMO KAFEIBU	076-23-10-99	
5	Mohamed Kamara	JOROMO KAFEIBU	078-77-14-08	
6	Mohamed Fayia	JOROMO KAFEIBU		
7	Aliou Lahai	JOROMO KAFEIBU	076-32-68-49	
8	Mohamed Samie	JOROMO KAFEIBU	076-20-82-95	
9	Lahai Turray	JOROMO KAFEIBU		
10	Mohamed Lamin	JOROMO KAFEIBU	099-78-75-60	
11	Shaku Kamanda	JOROMO KAFEIBU	079-66-72-79	



REHABILITATION OF 500Km FEEDER ROADS IN 14 DISTRICTS

ATTENDANCE LIST FOR PUBLIC PARTICIPATION

Date: _____ Location Kasama Venue: Town Chief Residence

No.	Name	Organization	Contact	Signature
1	Madam Manie Alpha	Town Chief		
2	Madam Hawa Makaworia	Local Resident		
3	Koroma Steven	Local Resident	076247027	
4	Margaret Issa	Local Resident		
5	Lebbie Jimmy			
6	Salimata Juwaid			
7	Eleanor Jimmy			
8	Jitta James			
9	Chris Mattie			
10	Manie Kamara			
11	Jonathan Bally	Salon Chief		

Bombali. Masongbo - Makel

20/13

No	Name	Designation	Contact
1	Abubakar Kamara	27	
2	pa Abu Tarawalli	28	Lamin Kaloloh
3	Sheik Mustafa Tunlah	29	pa Musa Kamara
4	pa Mamudu Tarawalli	30	pa Abdulai Sesay
5	pa Abdulai Kamara		Issa Kamara
6	Abdulai Turatallie		
7	Hassan Turay		
8	Yusifu Kamara		
9	Mohammed City Kamara		
10	Morkai Kamara		
11	Mohammed S Kamara		
12	Abdulai Marli Kamara		
13	Abdulai Turay		
14	Iye Kangbo		
15	Mohamed Turay		
16	Samuel Turay		
17	pa Mansaray		
18	pa Dirisa Kamara		
19	Mohammed F. Tarawalli		
20	Brima Kamara		
21	Barishu Tarawalli		
22	Serreh Tarawalli		
23	Idrissa Turay		
24	Lansa Kamara		
25	pa Osman Kamara		
26	Umara Kamara		