



THE REPUBLIC OF SIERRA LEONE

Ministry of Local Government and Rural Development

JSDF Project
Strengthening Community Mobilization and Local Council Service Delivery in the
Post-Ebola Context

Environmental and Social Management Framework
[ESMF]

August 2016

LIST OF ACRONYMS

| | |
|--------|---|
| DE | District Engineer |
| DoF | Department of Forestry |
| DLCP | Department of Land and County Planning |
| DPO | Development Planning Officer |
| DSDPII | Decentralized Services Delivery Program –Phase II |
| DSL | Department of Survey Lands |
| EA | Environmental Assessment |
| ESIA | Environmental and Social Impact Assessment |
| ESMF | Environmental and Social Management Framework |
| ESMP | Environmental and Social Management Plan |
| ESO | Environmental and Social Officer |
| ESS | Environmental and Social Specialist |
| GDP | Gross Domestic Product |
| GoSL | Government of Sierra Leone |
| IDA | International Development Association (of the World Bank) |
| IPAU | Integrated Project Administration Unit |
| JSDF | Japan Social Development Fund |
| LGA | Local Government Act |
| LGFC | Local Government Finance Committee |
| LGFD | Local Government Finance Division |
| MAFFS | Ministry of Agriculture, Forestry and Food Security |
| MDAs | Ministries, Departments, and Agencies |
| MLCPE | Ministry of Lands, Country Planning and the Environment |
| MLGRD | Ministry of Local Government and Rural Development |
| MoFED | Ministry of Finance and Economic Development |
| MoHS | Ministry of Health and Sanitation |
| MSWGC | Ministry of Social Welfare, Gender and Children |
| MTI | Ministry of Trade and Industry |
| MWHI | Ministry of Works, Housing and Infrastructure |
| NEAP | National Environmental Action Plan |
| NGO | Non-Governmental Organization |
| ORAF | Operational Risk Assessment Framework |
| PDO | Project Development Objectives |
| RAP | Resettlement Action Plan |
| RFP | Request for Proposal |
| RPF | Resettlement Policy Framework |
| SLEPA | Sierra Leone Environmental Protection Agency |
| WC | Ward Committee |

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EXECUTIVE SUMMARY

Introduction

The Government of Sierra Leone (GoSL) with support from the World Bank (the Bank) is currently implementing DSDP II and presently seeking funds from the Japan Social Development Fund (JSDF) for the implementation of the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context. The JSDF complements the activities supported under the DSDPII project, especially components 2 and 3. Pursuant to the requirements of the Bank, GoSL has prepared this Environmental and Social Management Framework (ESMF) for the project. The purpose of the ESMF is to provide strategic guidance for the integration of environmental and social considerations in the planning and implementation of the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context activities. The additional activities from the participatory budgeting have necessitated the preparation of this ESMF.

Purpose

The general framework for the assessment and management of environmental and social safeguards of developments/projects in Sierra Leone is codified in the Environmental Protection Agency Act, 2008 and the Environmental Protection Agency (Amendment) Act, 2010. Some development partners, however, have their own respective Environmental and Social (E&S) safeguards procedures and policies that must be followed for projects funded by them. As part of the funding arrangements for the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context, the Bank's Environmental Assessment safeguards policy (OP/BP 4.01) was triggered. This requires the preparation of an ESMF. The features of the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context that triggered the ESMF are:

- The concept of participatory budgeting at the Ward and Community levels;
- Exact nature of Sub-project and activities not yet defined at this stage; and
- Exact location of Sub-projects not yet determined at this stage of the project.

The ESMF spells out the E&S safeguards, institutional arrangements and capacity required to use the framework. This will ensure that subprojects under the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context meet the national and local E&S requirements and is consistent with OP 4.01. It sets out principles and processes within which the subprojects will be implemented agreeable to all parties. The other objectives of the ESMF include:

- Provision of an approach that defines the Principles/Rules/Responsibilities for assessing and incorporating Safeguards into Subprojects
- Assessment of potential adverse E&S impacts commonly associated with the subprojects and ways to avoid, minimize or mitigate them.

- Establishment of clear procedures and methodologies for the E&S planning, review, approval and implementation of subprojects.
- Development of an environmental assessment (EA) screening/initial assessment system to be used for subprojects.
- Specification of roles and responsibilities and the necessary reporting procedures for managing and monitoring subproject E&S concerns.

Goal

The goal of the ESMF is to strategically guide the integration of environmental and social issues into the planning and implementation activities of the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context so as to enhance any positive and sustainable environmental and social outcomes of the project and to mitigate and manage the adverse impacts. The ESMF will provide all key stakeholders with a framework within which any negative environmental and social impacts will be addressed.

Study Objectives

The purpose of the study is to prepare an ESMF for Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context for the Government of Sierra Leone to source funds from the JSDF.

Approach and Methodology for ESMF Preparation

The ESMF study has been prepared in accordance with applicable Bank safeguards policies and GoSL environmental guidelines. The distinct phases of the study included:

- Review of the existing ESMF for DSDP II;
- Data gathering and field visits;
- Consultations and discussions with ministries, departments, agencies, local governments, and non-governmental organizations;
- Environmental screening and scoping;
- Determination of potential impacts;
- Identification of impact mitigation measures;
- Preparation of an Environmental and Social Management Plan (ESMP);
- Preparation of subproject guidelines; and
- Preparation of guidelines for contractors.

Consultations for ESMF Preparation

Consultations were held with the listed ministries, agencies and Local Councils to gain insight on the types of projects handled and how resettlement issues have been addressed, with respect to projects under the DSDPII. The consultations also explored the capacity needs of these organizations to implement the ESMF, and what could be done to enhance the incorporation of mitigation measures for subprojects under the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context. The following organizations were consulted:

- Ministry of Finance and Economic Development (MoFED);
- Ministry of Local Government and Rural Development (MLGRD);
- Ministry of Social Welfare, Gender and Children (MSWGC);
- Ministry of Health and Sanitation (MoHS);
- Ministry of Lands, Country Planning and Environment (MLCPE);
- Sierra Leone Environmental Protection Agency (SLEPA);
- Department of Social Welfare;
- National Youth Commission;
- Local Government Finance Department (LGFD);
- Integrated Project Administration Unit (IPAU);
- Decentralization Secretariat (DecSec);
- National Lands Board; and
- Port Loko, Bombali, Koinadugu Local Council, and Freetown City Council.

A briefing/disclosure meeting on the activities of the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context and ESMF for the leadership of key implementing agencies was held from May 30 to June 10, 2016 at the IPAU offices.

Policy, Legal and Institutional Framework for Environmental Management

The environmental policy and environmental assessment (EA) legislation and procedures of Sierra Leone and those of the World Bank, which are relevant to the project, are outlined below. In principle, the two sets of policies and procedures on environmental and social assessment are similar in many respects. The relevant Sierra Leone national regulatory frameworks include:

- Constitution of Sierra Leone, 1991
- Local Government Act, 2004
- National Land Policy, 2005
- Environmental Protection Agency Act, 2008 and the Environmental Protection Agency (Amendment) Act, 2010.

Under the EPA Act, 2008, SLEPA is required to conduct monitoring to verify compliance with given approval/permit conditions, required environmental standards and mitigation commitments. Furthermore, a requirement by SLEPA for an EA precludes any Local Council from licensing, permitting, approving or consenting such undertaking, unless notified.

The World Bank's ten plus two safeguards policies are designed to help ensure that programs proposed for financing are environmentally and socially sustainable, and thus improve decision-making. The Bank's Operational Policies (OPs) are meant to ensure that Bank operations do not lead to adverse impacts or cause any harm. The safeguards policies are divided into environmental, social, legal, consultation and access to information policies, which include:

- OP 4.01 Environmental Assessment;
- OP 4.04 Natural Habitats;
- OP 4.09 Pest Management;
- OP4.12 Involuntary Resettlement;
- OP 4.10 Indigenous Peoples;
- OP 4.11 Physical and Cultural Resources;
- OP 4.36 Forests;
- OP 4.37 Safety of Dams;
- OP 7.50 Projects on International Waters;
- OP 7.60 Projects in Disputed Areas;
- Access to information Policy; and
- OP/BP 4.00, Piloting the Use of Borrower Systems.

The proposed Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context project has triggered the Environmental Assessment Policy (OP 4.01).

This project is not anticipated to have any major social risks relating to land acquisition and loss of livelihood. As such, it does not trigger OP 4.12 (Involuntary Resettlement). The project activities include capacity building, disaster risk management, community engagement, citizen participation, and community monitoring. Sub-component 2B will however fund subproject determined by community participants in two (2) LCs through a PB sub grant of US\$300,000 per LC. Given the relatively small funding window, the project is not expected to generate subprojects with adverse social impact. The Project also excludes by design the acceptance of subprojects that would result in land acquisition.

Description of Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context

The EVD epidemic tested the effectiveness of service delivery at the community level and has led to revisiting the decentralization programs and redoubling efforts in this direction. LCs are good interlocutors with communities and their local knowledge can help them reach the most vulnerable population groups. The project seeks to build trust and intra-communal cohesion where it has been compromised, increase social mobilization, and make local social services more responsive to citizen needs in the post-EVD environment.

The two main objectives of the proposed grant include improvement of the quality and the adequateness of LC social services. These gaps will be filled by mobilizing resources in sensitization activities, developing social accountability and citizen feedback mechanisms, and by piloting innovative measures that stimulate monitoring of public services and allocation of resources at the local level closer to citizen priorities.

The Project has three interdependent components.

Component 1 - LC social sensitization activities. The component seeks to promote social cohesion and resilience through strengthening LC capacity and by implementing community-wide sensitization meetings, forums and health talks, diminishing the negative effects of Ebola on social trust and providing much needed support to the victims.

Component 2 - Tailoring LC service delivery through social mobilization. The component focuses on building community resilience in the two districts most affected by EVD by: i) creating social accountability and community monitoring mechanisms for the effective delivery of social services; ii) promoting direct citizen engagement in the monitoring of LC services; and iii) piloting participatory budgeting.

Component 3 - Project management, M&E and knowledge management. The component focuses on the operational support geared towards project management, M&E and knowledge management.

The proposed Project was designed in close partnership with staff from DecSec, IPAU, EVD first aid psychosocial response teams in MoSWGCA, CSOs,¹ and representatives from all 19 LCs and members of WDCs. The Project team met with representatives from

¹ Bilateral consultations were held in June 2015 in Freetown with representatives from some of the most active CSOs at Sierra Leone's community level: (i) the Centre for Accountability and Rule of Law; (ii) the Campaign for Good Governance; (iii) the Centre for the Coordination of Youth Activities; (iv) the Network Movement for Justice and Development; and (v) the Civil Society Movement of Sierra Leone.

the Embassy of Japan in Accra (responsible for Sierra Leone), JICA Sierra Leone, and other partners.

Environmental and Social Issues Relevant to Project

The potential environmental and social impacts of the likely investments are not currently known, even though they are likely to be minor. Since the exact location, nature and number of investments and/or services are not known, the Government of Sierra Leone has prepared an Environmental and Social Management Framework (ESMF) to ensure that all prospective investments are adequately screened for their potential environmental and social impacts, and the correct procedures to be followed, depending on the types of investments to be carried out, are reflected in the ESMF document.

Sierra Leone Baseline Profile

Sierra Leone is a small West African country located at latitude 8300 N and longitude 11300 W, bordered on the north and east by Guinea for about 652 km, on the south by Liberia for about 306km and on the west by the Atlantic Ocean. Sierra Leone has a total surface area of 71,740 sq. km of which the total land area is 71,620 sq. km and 120 sq.km is water. Sierra Leone can be divided into four distinct physical regions: Coastal Swamp, Peninsula Area, Inland from the Coastal Plain, and Loma Mountains of the northeast.

The climate is tropical and is characterized by alternating rainy and dry seasons. Conditions are generally hot and humid. Mean monthly temperatures range from 25°C to 28°C in low-lying coastal areas; inland the range may be from 23°C to 28°C. In the northeast, where extremes of temperature are greater, mean daily minimums fall to 13°C in January, and mean daily maximums rise to 32°C in March. Precipitation is greater on the coast than inland, with as much as 5,080 mm of rain fall annually on the Peninsula Mountains, while the Northeast receives about 2,032mm a year.

The dry season, from November to April, is characterized by the dry harmattan that blows from the Sahara. The rainy season tends to have cooler daily maximum temperatures than the dry season by about 60 C. The relative humidity, however, may be as high as 90 percent for considerable periods, particularly during the wettest months, from July to September.

Sierra Leone is one of the poorest countries in the world, and its economic activity is largely influenced by the public sector. The economy has always been based on the exploitation of natural resources, notably agricultural, marine and mineral resources. The agricultural sector accounts for 44.1 percent of the Gross Domestic Product (GDP).²

² Government of Sierra Leone. *Economic Bulletin* 9 (2): March 2003.

Agriculture has remained traditional and subsistence in character, incapable of satisfying the food needs of the country by a wide margin, and improving the living standards of the broad mass of the population. Over 70 percent of the country's labour force is employed in agriculture.

The population of Sierra Leone is estimated at 7.0 million, growing at a rate of about 2.6 percent per year. The total population is made up 48.9% males and 51.1% females. The country's population is made of many ethnic groups the largest and most prominent being the Mende, Temne, Limba, Kuanko, Sisu, Yalunka, Loko, Mandinka, Kono, Kisi and the Creoles. The population density of about 58 persons per sq. km is relatively high as compared to other countries in Sub-Saharan Africa. The population is concentrated in particular regions of the country, including the Freetown Peninsula and the Kono, Kenema and Bo Districts. The northern part of the country is sparsely populated. A large section of the population is unemployed, especially among the youth. An estimated 68 percent live close to the forest or forest re-growth area on which they depend for their livelihood.

Potential Environmental and Social Impacts

The overall environmental and social impacts of the project are expected to be positive, with significant positive impacts to the natural and socio-economic environment by participating Local Councils.

Potential Environmental Impacts

The proposed upgrading of infrastructure works will have minimal impact on the environment. An assessment of the negative impacts can be classified into construction phase and post-construction phase impacts. The construction phase includes site clearing, excavations and grading, upgrading of drains and construction of educational and health infrastructure. Some of the potential minor environmental impacts are:

- Loss of ornamental and economic trees;
- Soil and land degradation;
- Visual intrusion;
- Air quality impacts;
- Vehicular traffic implications;
- Noise pollution and ground vibration;
- Construction waste generation;
- Solid waste generation; and
- Occupational, health and safety issues.

Potential Social Impacts

Social impacts may emanate from various activities under the JSDF Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context within the Local Councils. Some of the overall expected positive social impacts include:

- building trust and intra-communal cohesion;

- increasing social mobilization; and
- making local social services more responsive to citizen needs.

Environmental and Social Management Framework

During the implementation of Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context activities, potential environmental and social impacts must be considered and managed. The impacts must be mitigated, minimized or preferably avoided particularly to meet the requirements of World Bank safeguards policies and requirements under the environmental laws of Sierra Leone.

The objective of the ESMF is to outline the institutional arrangements relating to: (i) identification of environmental and social impacts arising from the sub-project activities; (ii) implementation of proposed mitigation measures; (iii) capacity building; and (iv) monitoring. The ESMF will be included in the operational manual. The ESMF outlines mechanisms for:

- ESMF Implementation and Management and covers screening of proposed subprojects; identifying potential environmental and social impacts and institutional arrangements for the ESMF implementation and capacity building; and estimated costs related to the ESMF implementation.
- Monitoring and reporting of ESMF implementation.
- Public consultation and disclosure.

ESMF Implementation and Management

The Ministry of Finance and Economic Development (MoFED) will be the lead implementing agency for the Project. An Environmental and Social Specialist (ESS) has been hired and located in DecSec. The ESS will be responsible for preparing TORs for any Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP) if needed.

In addition, the ESS will monitor whether contractors comply with the recommendations of these instruments and whether environmental and social management clauses are inserted into the contract during the construction phase. The ESS will assist in enforcing compliance with safeguards policies and monitor the implementation of the ESMPs.

The Government of Sierra Leone has facilitated the recruitment of Environmental and Social Officers (ESO) by the LCs to assist with the implementation of the ESMF under the DSDP II. In the absence of an ESO at post the Development Planning Officers (DPOs) in the LCs will perform the functions of the ESO.

Arrangements for Implementation of Screening Process

The frontline implementers will also collaborate with the SLEPA and the World Bank to ensure effective execution of the ESMF. Table 1 provides a summary of the stages and institutional responsibilities for the screening, preparation, assessment, approval and implementation of Project activities.

Table 1: Summary of ESMF Implementation and Management Arrangements

| No | Stage | Management Responsibility | Implementation Responsibility |
|----|--|---------------------------|-------------------------------|
| 1 | <i>Appointment of ESS</i> | MLGRD | DecSec |
| 2 | <i>Recruit ESOs</i> | LGSC/ MLGRD | LCs |
| 3 | Initial screening for Environmental and Social Infrastructure Project: <i>In-house Environmental and Social Screening Checklist for Sub-projects</i> | LCs | ESO, LCs' Dept. of Works |
| 4 | <i>Verification of In-house Environmental and Social Screening Checklist for Sub-projects</i> | DecSec/ MLGRD | ESS |
| 5 | Complete checklist for the Issuance of Environmental Impact Assessment (EIA) | LCs | ESO, LCs' Dept. of Works, ESS |
| 6 | Determination of appropriate environmental categories | SLEPA | SLEPA |
| 7 | Classification of project Determination of environmental work Review of screening | SLEPA | SLEPA |
| 8 | Implementation of environmental work | LCs | Contractors, ESOs, ESS |
| 9 | Preparation of terms of reference | MLGRD | LCs, ESS |
| 10 | Selection of Consultant | | DecSec |
| 12 | Realization of the EIA Public consultation Integration of ESMP issues in tendering and project implementation | DecSec | DecSec, ESS |
| 13 | Review and approval | SLEPA | SLEPA |
| 14 | EIA approval | SLEPA | SLEPA |
| 15 | Public consultation and disclosure | DecSec | DecSec, ESS |
| 16 | Surveillance and monitoring | SLEPA, LCs, DecSec | SLEPA, LCs, DecSec |
| 17 | Development of monitoring indicators | SLEPA | DecSec, ESS |

Monitoring and Reporting of ESMF Implementation

Oversight for the environmental and social management process of the subprojects will be assured by the ESO in collaboration with the ESS. Monitoring will be conducted during all phases of the project. The ESS will prepare a long term monitoring strategy that will encompass clear and definitive parameters for each subproject. The monitoring plan will take into consideration the scope of development, the environmental and social sensitivity, and the financial and technical means available for monitoring. The plan will identify and describe the indicators to be used, the frequency of monitoring and the standard (baseline) against which the indicators will be measured for compliance with the ESMF. A number of indicators (see Table 2) would be used in order to determine the status of the compliance of the ESMF provisions.

Table 2: Indicators for Monitoring ESMF Implementation

| <i>Measures</i> | <i>Interventions</i> | <i>Output Indicators</i> |
|---|--|---|
| Technical measures (studies) | <p>Completing In-house E&S Checklist</p> <p>Completing SLEPA Checklist on Issuance of EIA</p> <p>Conducting EIA and ESMP.</p> <p>Develop a health and safety plan.</p> | <p>Number of In-house E&S Checklist completed</p> <p>Number of SLEPA Checklist on Issuance of EIA completed</p> <p>Develop the TOR.</p> <p>Number of ESIA's, ESMPs, Health and Safety Plans submitted for each subproject to LCs.</p> <p>Number of studies carried out.</p> |
| Measures for monitoring and evaluating projects | <p>Perform monitoring and evaluation.</p> <p>ESMP (continuous monitoring, midterm and annual assessment).</p> | <p>List of indicators identified for each subproject.</p> <p>Number of monitoring missions for each subproject.</p> <p>Number of monitoring reports submitted for each subproject.</p> |
| Institutional measures | <p>Recruit an ESO to support LCs.</p> <p>Awareness and structured training for staff of MLGRD, DecSec, LGFD, IPAU and LCs</p> | <p>Develop TORs for the ESO.</p> <p>Number of reports submitted per subproject.</p> <p>Number of missions in which safe-guard officers have participated per subproject.</p> <p>Number of EA trainings conducted for staff per region.</p> <p>Number in attendance (male/female) at EA trainings.</p> |

| | | |
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| | implementing JSDF activities. | Number of awareness trainings conducted before, during and after project implementation in each region. Number of staff in attendance at awareness trainings (male/female). |
| Awareness | Awareness about HIV/AIDS. Communication campaign and awareness before, during and after construction. The good conduct in the camps, hygiene measures and safety, compliance with development standards. | Number of subproject sites/camps with adequate posters. Number and types of people sensitized. |

Capacity Strengthening for ESMF Implementation

In order for MLGRD/DecSec to collaborate closely with LGFD and IPAU and effectively carry out the environmental and social management responsibilities for subprojects implementation, institutional strengthening will be required. The staffs of MLGRD, DecSec, LGFD, SLEPA and LCs will need to undergo capacity building.

To successfully implement the ESMF, a training program for DecSec, LGFD, IPAU and LCs is necessary. Proposed capacity building training needs are as follows:

- Environmental and social management process
- Use of screening form and checklist
- Preparation of terms of reference for carrying out EA
- Design of appropriate mitigation measures
- Review and approval of EA reports
- Public consultations in the ESMF process
- Monitoring the implementation of mitigation measures
- Integrating ESMP into the implementation of subprojects.

Resettlement Policy Framework (RPF)

This project is not anticipated to have any major social risks relating to land acquisition and loss of livelihood. As such, it does not trigger OP 4.12 (Involuntary Resettlement). The project activities include capacity building, disaster risk management, community engagement, citizen participation, and community monitoring. The Project also

excludes by design the acceptance of subprojects that would result in land acquisition, hence no Resettlement Policy Framework (RPF) was prepared under the project.

Community Participation

Community participation guidelines and indicators in the results framework will be used as a mechanism to track and ensure that community participation at the Ward level is being fostered. The use of community scorecards will also engage communities in monitoring and reflect community views on service delivery. In addition, community participation will ensure community inclusion in the implementation of safeguards.

Grievance Redress Mechanism (GRM)

The three-tier GRM is designed to channel and address grievances, questions, concerns, and complaints related to the project from citizens to the project implementers (local councils, ward committees, project management).

Proposed Budget for ESMF Implementation

The budget estimates for the implementation of the ESMF are show inTable 3. The estimates are built on the assumption that some capacity was acquired from DSDPII project experiences by DecSec, LGFD, IPAU and SLEPA.

Table 3: Proposed Budget for ESMF Capacity Building Implementation Activities

| <i>No.</i> | <i>Institution</i> | <i>Capacity Gaps Identified</i> | <i>Capacity Building Measures</i> | <i>Rate</i> | <i>Estimated Cost (US\$)</i> |
|------------|--|--|---|---------------------------|------------------------------|
| 1. | Strengthen SLEPA and LCs capacities to effectively handle environmental and social safeguards issues | Inadequate number of staff at the regional offices and LCs | Organize at least four regional workshops | US\$12,000 per workshop | US\$47,082 |
| | | Inadequate know-how in project cycle | Training in SEA and project cycle review (5 days for 5 persons per regional office for 3 regions) | | US\$10,000 |
| | | Lack of staff to coordinate environmental and social safeguards agenda | Establish safeguards desks in 19 LCs and equip them with computers, printers and digital cameras | US\$40per person per day) | US\$190,000 |
| | | | Train resident technical facilitators in safeguards techniques for | US\$10,000 per LC | US\$40,000 |

| | | | | | |
|------------------|-------------------------------------|--|--|---------------------------|--------------------|
| | | Inadequate knowledge of LCs and WCs on safeguards issues | effective backstopping of LCs contractors Prepare user-friendly technical manuals on safeguards management | | US\$25,000 |
| Sub-Total | | | | | US\$312,082 |
| 2. | DecSec and IPAU | Inadequate knowledge of staffing environmental and social safeguards principles for physical subprojects | Organize training course in safeguards management, labor standards, contract management (5 days for 5 persons per regional office) | | US\$30,000 |
| Sub-Total | | | | | US\$30,000 |
| 3. | Ward Councils and Chiefdom Councils | Lack of awareness among community members on the workability of safeguards in physical subproject implementation | Sensitization of Ward Council / Chiefdom Council members on | US\$5 per person per day | US\$50,000 |
| Sub-Total | | | | | US\$50,000 |
| 5. | Contractors | Inadequate capacity in mainstreaming safeguards issues in design and implementation of subprojects | Technical training in the use of ESMF in planning and design phase of physical subprojects | US\$40 per person per day | US\$15,000 |
| Sub-Total | | | | | US\$15,000 |
| TOTAL | | | | | US\$407,082 |

1.0 INTRODUCTION

1.1 Background

Sierra Leone is making a rapid recovery following a brutal, decade-long civil war that killed 20,000 people and displaced half the population. The country has been on a path of reconciliation, reconstruction, and stabilization of its economy and governance systems. Since the end of the civil war, the country has held two parliamentary, presidential, and local elections, all of which have been deemed free and fair. It is preparing for the third round of elections in late 2012. Recovery continued for an eleventh unbroken year in 2010 with real Gross Domestic Product (GDP) growing at 5 percent despite rising food and fuel prices and in the ever-present residual risks from a global downturn.

Large mining projects and potential oil discovery provide tremendous opportunities for increased revenue collections as well as significant downside risks. The Doing Business 2012 report ranked Sierra Leone among the top ten global reformers; yet, sustained improvements in the investment climate are required to attract further private sector investments in a number of sectors. These sectors could be growth drivers alongside the extractives sector.

Nevertheless, the challenge to sustain political stability, address the striking human development deficits, and build infrastructure continues. There is a particular need to strengthen the national and sub-national democratic institutions and translate the likely gains of economic growth into improvements in poor people's lives – improved service delivery is particularly key in the achievement of this objective. Despite investments, outcomes have not improved significantly: Sierra Leone is currently ranked eighth from the bottom in the United Nations Development Program (UNDP) Human Development Index.

1.2 Sectoral and Institutional Context

The Government of Sierra Leone (GoSL) embarked on a decentralization program in 2004 with a view to defuse the political tensions, improve the governance environment, and establish an equitable and transparent resource transfer system from the central level to the local levels to reduce the resource gaps and income inequalities among regions, all geared towards improving service delivery. The program has attracted substantial support from development partners, particularly on public financial management reform and Local Council (LC) capacity development. The financing of functions devolved to LCs remains a government priority.

The initial stage of the devolution process was expected to be slow given the long legacy of centralized power in Sierra Leone and with the onset of the global economic recession in 2008, Sierra Leone's real growth rates and domestic revenue collection also slowed. In turn, the World Bank (the Bank) was concerned that this could threaten the implementation of the GoSL Decentralization Program and presage expenditure cuts to

key basic services and LC transfers in real terms. Thus, conscious of the promise that decentralization offered in terms of improved service delivery but worried about potential lack of funding for LCs, the Bank prepared an adaptable program (credit during Phase I and grant during Phase II) to assure predictable resource flows to LCs. In practice the government has been able to maintain support to LCs, showing the high level of political support and the IDA resources have been welcome as additional funding. The LCs appeared to have used the additional resources very effectively, while substantially meeting the triggers for Phase II.

Consequently, GoSL is currently implementing DSDP II and also seeking funds from the JSDF to undertake the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context. The additional activities from the participatory budgeting have necessitated the preparation of this ESMF.

1.3 Proposed Development Objective of JSDF -Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context

The PDO is to deliver an immediate response to the post-EVD needs at the local level in Sierra Leone by building community resilience through social mobilization and adequate service delivery from Local Councils.

The PDO will be achieved through: (i) community sensitization activities to enhance social cohesion in the four (4) districts most affected by EVD; (ii) effective social accountability and community-based monitoring instruments in the two (2) districts most affected by EVD; and (iii) a participatory budgeting initiative in the two (2) districts most affected by EVD.

1.3.1 Key Results of JSDF -Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context

1. It is estimated that 50,000 direct beneficiaries will be reached by the Project, of which 50 percent will be female:³
 - 25,000 participants in LC trauma and sensitization interventions (of which 50 percent female).
 - 20,000 participants in community monitoring activities in new districts in which the CMI is piloted (of which 50 percent female).
 - 5,000 participants in the participatory budgeting pilot (of which 50 percent female).

³ Figures are calculated drawing from the estimate number of beneficiaries of other DSDP2 activities with a similar scope, bearing in mind activities under this grant proposal will be piloted in a limited number of LCs. The number of participants in the participatory budgeting pilot is equivalent to the minimum participation threshold required under Component 2: at least 2,500 participants per LC.

2. Progress toward the achievement of the PDO will be measured through the following outcome indicators:

- Percentage of beneficiaries who affirm social sensitization activities have been positive toward bringing people together in the four (4) districts in which sensitization activities are conducted.⁴
- Number of sectors in CMI piloting districts periodically assessed and managed considering citizen feedback.⁵

3. Percentage of beneficiaries who affirm public budgeting processes generated a positive social mobilization effect in the two (2) districts in which participatory budgeting is conducted.⁶

4. The Project will monitor the following output indicators, which are essential to achieving the PDO:

5. Number of beneficiaries reached through LC trauma and sensitization interventions (of which percentage are female).

6. Number of participants in social accountability initiatives in new districts in which the CMI is piloted (of which percentage are female).

7. Number of participants in the participatory budgeting pilot (of which percentage are female).

1.5 Purpose

A general framework for Environmental Management (EM) for development projects is provided in the Environmental Assessment (EA) regulations of Sierra Leone. The government's development projects often are supported by development partners, and the development partners usually have their own environmental and social (E&S) safeguards that provide guidelines for the projects. As part of funding arrangements for the JSDF -Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context therefore, the World Bank's E&S safeguards policy (OP/BP 4.01 - Environmental Assessment) must apply. This requires the preparation of an ESMF. The features of the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context that trigger an ESMF are:

- The concept of participatory budgeting at the Ward and Community levels;
- Exact nature of Sub-project and activities not yet defined at this stage; and
- Exact location of Sub-projects not yet determined at this stage of the project.

⁴ As measured by an additional question to be included in DSDP2's Integrated National Public Services Survey (INPSS). INPSS is an annual survey that assesses beneficiary perception of local public services and local institutions.

⁵ As measured by a new variable to be included in DSDP2's Comprehensive Local Government Performance Assessment System (CLOGPAS). CLOGPAS is an annual survey that monitors capacity developments at the LC level, assesses LC performances on a comparative basis, and identifies capacity needs.

⁶ As measured by an additional question to be included in INPSS.

The term ESMF is used by the World Bank to depict operations with multiple subprojects, various phases and spread over a long period. Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context is classified as Category B under the Bank's EA procedures.

The ESMF spells out the World Bank safeguards policies as well as the country's institutional arrangements and capacity required to implement the framework. It will ensure that subprojects meet national and local E&S requirements and are consistent with OP4.01 and OP4.12. The ESMF sets out the principles and processes within which the subprojects will be implemented agreeable to all parties. The other objectives of the ESMF include:

- Provision of an approach that defines the Principles/Rules/Responsibilities for assessing and incorporating Safeguards into Subprojects
- Assessment of potential adverse E&S impacts commonly associated with the subprojects and ways to avoid, minimize or mitigate them.
- Establishment of clear procedures and methodologies for the E&S planning, review, approval and implementation of subprojects.
- Development of an environmental assessment (EA) screening/initial assessment system to be used for subprojects.
- Specification of roles and responsibilities and the necessary reporting procedures for managing and monitoring subproject E&S concerns.

1.6 Goal

The goal of the ESMF is to strategically guide for the integration of environmental and social issues into the planning and implementation activities of Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context so as to enhance any positive and sustainable environmental and social outcomes of the project. The ESMF will provide all key stakeholders with a framework within which negative environmental and social will be addressed. It will be principally used by MDAs, Local Councils and other collaborators to ensure that adequate mitigation measures and other environmental and social safeguards have been incorporated into the subprojects to be implemented under Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context.

1.7 Study Objectives

The purpose of the study is to prepare an ESMF for Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context for the Government of Sierra Leone to source funds from the JSDF.

1.8 Approach and Methodology for ESMF Preparation

1.8.1 Approach

The ESMF study has been prepared in accordance with applicable Bank safeguards policies and GoSL environmental guidelines. The distinct phases of the study included:

- Review of the existing ESMF for DSDP II;
- Data gathering and field visits;
- Consultations and discussions with ministries, departments, agencies, local governments, and non-governmental organizations;
- Environmental screening and scoping;
- Determination of potential impacts;
- Identification of impact mitigation measures;
- Preparation of an Environmental and Social Management Plan (ESMP);
- Preparation of subproject guidelines; and
- Preparation of guidelines for contractors.

1.8.2 Data Gathering

The ESMF was updated with the relevant baseline data related to the biophysical and socio-economic characteristics of the environment to be covered by the project. The baseline data reviewed included: topography, soil, water resources, and biological and socio-economic data.

1.8.3 Literature Review

The ESMF preparation involved document review. The approach was based on review of available project literature and other strategic planning documents at the national and Local Council levels. The GoSL and the Bank reference documents reviewed included:

- Environmental Protection Agency Act, 2008
- Environmental Protection Amendment Act, 2010
- National Environmental Action Plan of Sierra Leone
- Safeguards Policies of the World Bank.

1.9 Consultations for ESMP Preparation

During the period of updating, consultations were held with key stakeholders including the following organizations: Ministry of Finance and Economic Development, Ministry of Local Government and Rural Development, Ministry of Social Welfare, Gender and Children, Ministry of Health and Sanitation, Ministry of Lands, Country Planning and Environment, Sierra Leone Environmental Protection Agency, Department of Social Welfare, National Youth Commission, Local Government Finance Department, Integrated Project Administration Unit, National Lands Board, Port Loko, Bombali, Koinadugu Local Council, and Freetown City Council.

Selected projects sites were visited at Port Loko, Bombali, Koinadugu Local Council, and Freetown City Council.

A briefing/disclosure meeting on the updated ESMF as a result of the activities of the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context for the leadership of key implementing agencies was also held from May 30 to June 10, 2016 at the IPAU offices.

The proposed Project was designed in close partnership with staff from DecSec, IPAU, EVD first aid psychosocial response teams in MoSWGCA, CSOs,⁷ and representatives from all 19 LCs and members of WDCs. The Project team met with representatives from the Embassy of Japan in Accra (responsible for Sierra Leone), JICA Sierra Leone, and other partners.

⁷ Bilateral consultations were held in June 2015 in Freetown with representatives from some of the most active CSOs at Sierra Leone's community level: (i) the Centre for Accountability and Rule of Law; (ii) the Campaign for Good Governance; (iii) the Centre for the Coordination of Youth Activities; (iv) the Network Movement for Justice and Development; and (v) the Civil Society Movement of Sierra Leone.

2.0 POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 Legal and Regulatory Framework for Environmental Management

The environmental policy and environmental assessment (EA) legislation and procedures of Sierra Leone and those of the World Bank, which are relevant to the project, are outlined below. In principle, the two are similar in many respects though the World Bank policies are more stringent. Hence, the policies of the World Bank override those of the Sierra Leone should any discrepancy arise.

2.2 Sierra Leone Environmental Requirements

The relevant Sierra Leone national regulatory frameworks include:

- Constitution of Sierra Leone, 1991;
- Local Government Act, 2004;
- National Land Policy, 2005;
- Environmental Protection Agency Act, 2008; and
- Environmental Protection Agency (Amendment) Act, 2010.

2.2.1 Constitution of Sierra Leone, 1991

The Constitution includes provisions to protect the rights of individuals to private property, and also sets principles under which citizens may be deprived of their property in the public interest as described in *Section 21*. 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/she is entitled and for the purpose of obtaining prompt payment of that compensation.

2.2.2 Local Government Act, 2004

The Act establishes the Local Council (LC) as the highest political authority in the locality and confers 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. *Part II* of this schedule also establishes the number of Paramount Chiefs in each LC. The *Third Schedule* establishes the functions devolved to the LCs. The *Fourth and Fifth Schedules* establish departments under each LC, and a Valuation List and Rate Books respectively.

2.2.3 National Lands Policy, 2005

As provided in the Constitution, the 2005 National Land Policy also provides for the compulsory acquisition of land in the public interest. The principles of the land policy include among others: The 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 a principle only holds where it does not

violate existing rights of private ownership. Compensation to be paid for lands acquired through compulsory government acquisition will be fair and adequate and will be determined, among other things, through negotiations that take into consideration government investment in the area. Local Authorities (City and District Councils) may negotiate for land for project development purposes, but all such grants should be properly documented and processed. No interest in or right over any land belonging to an individual or family can be disposed of without consultation with the owner or occupier of the land. 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.

2.2.4 *Environmental Protection Agency Act, 2008 and Environmental Protection Agency (Amendment) Act, 2010*

The Environmental Protection Agency Act, 2008 established the Sierra Leone Environmental Protection Agency (SLEPA), to provide for the effective protection of the environment and for other related matters. This Act mandates the EPA among others to:

- Advise the minister on the formulation of policies on all aspects of the environment and in particular make recommendations for the protection of the environment.
- Issue environmental permits and pollution abatement notices for controlling the volume, types, constituents and effects of waste discharges, emissions, deposits or other sources of pollutants of substances which are hazardous or potentially dangerous to the quality of the environment or any segment of the environment.
- Prescribe standards and guidelines relating to ambient air, water and soil quality, the pollution of air, water and land and other forms of environmental pollution including the discharge of waste and the control of toxic substances.
- Ensure compliance with any environmental impact assessment procedures laid down in the planning and execution of development projects, including compliance in respect of existing projects.
- Impose and collect environmental protection levies in accordance with this Act or regulations made under this Act.
- *Sections 24* of the Act lists project activities requiring an Environmental Impact Assessment license which include infrastructural projects such as roads and bridges. *Sections 25 and 26* describe factors for determining whether a project requires an environmental impact assessment and the contents of the environmental impact assessment respectively. The Act describes the procedures to be followed to obtain permits for both existing and proposed undertakings through the conduct of environmental impact assessments.

- The Environmental Protection Agency (Amendment) Act, 2010 sought to give executive powers to the Board.

2.3 World Bank Safeguards Policies

The DSDP II and Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context are classified as Category B, implying that the expected environmental impacts are largely site-specific, that few if any of the impacts are irreversible, and that mitigation measures can be designed relatively readily. The environmental assessment for a Category B project:

- Examines the project's potential negative and positive environmental impacts
- Recommends measures to prevent, minimize, mitigate, or compensate for adverse impacts
- Recommends measures to improve environmental performance.

The Bank's ten plus two safeguards policies are designed to help ensure that the projects proposed for financing are environmentally and socially sustainable, and thus improve decision-making. The Bank's Operational Policies (OPs) are meant to ensure that Bank operations do not lead to adverse impacts or cause any harm. The safeguards policies are divided into environmental and social policies, as listed below.

2.3.1 Disclosure (BP17.50)

The Bank's policy on disclosure, which currently under review, requires that all those residing in the given areas of a project have the right to be informed of the proposed development project. Prior to project appraisal, therefore, the summary of the study of the development action along with other relevant information should be disclosed by the Bank at the project area.

2.3.2 OP 4.36 Forests

OP/BP 4.36 aims at enhancing the environmental and social contribution of forested areas and the need to reduce deforestation. A basic concern of the policy is to protect the forests by minimizing the impact of all investment operations. OP/BP 4.36 promotes the restriction of operations affecting critical forest and conservation areas, while requiring that the sector and other relevant stakeholders be consulted as appropriate.

2.3.3 Environmental Assessment (OP 4.01)

OP 4.01 is an umbrella policy for the Bank's safeguard policies. The overarching objective is to ensure that Bank-financed projects are environmentally sound and sustainable, and that decision-making is improved through appropriate analysis of actions and of their likely environmental impacts.

EA is intended to: evaluate a project's potential environmental risks and impacts in its area of influence; examine project alternatives; identify ways of improving project selection, siting, planning, design, and implementation by preventing, minimizing, mitigating, or compensating for adverse environmental impacts and enhancing positive impacts; and include the process of mitigating and managing adverse environmental impacts throughout project implementation. The Bank favors preventive measures over mitigatory or compensatory measures, whenever feasible.

Among others, OP 4.01 requires that screening for potential impacts be carried out early, in order to determine the level of the EA. The Bank's project screening criteria groups projects into four categories:

- Category A: significant adverse environmental impacts that are sensitive, diverse, or unprecedented, which may affect an area broader than the sites or facilities subject to physical works.
- Category B: potential adverse environmental impacts are less adverse than those of Category A projects. Impacts are site-specific; few if any of them are irreversible.
- Category C: Minimal or no adverse environmental impacts. Beyond screening, no further EA action is required for a Category C project.
- Category FI: Investment of Bank funds through a financial intermediary, in sub-projects that may result in adverse environmental impacts."

The EA ensures that the appropriate levels of environmental and social assessment are carried out as part of the project design, including a public consultation process, especially for Category A and B projects. OP 4.01 is applicable to all components of Bank-financed projects, even for co-financed components.

The Project is not expected to generate any significant impacts, but OP 4.01 is triggered as a precaution due to participatory budgeting under component 2B.

2.3.4 *Natural Habitat (OP/BP 4.04)*

OP 4.04 aims at promoting the protection, maintenance and rehabilitation of natural habitats and their function. The Bank promotes and supports natural habitat conservation and improved land use by financing projects designed to integrate the conservation of natural habitats and the maintenance of ecological functions into national and regional development. Furthermore, the Bank promotes the rehabilitation of degraded natural habitats.

2.3.5 *Physical Cultural Resources (OP 4.11)*

OP 4.11 aims at ensuring that physical cultural property defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious,

aesthetic, or other cultural significance are protected from impacts resulting from project activities. The Bank assists countries in avoiding or mitigating adverse impacts on physical cultural resources from development projects that it finances while not contravening either the Borrower's national legislation or its obligations under relevant international environmental treaties and agreements.

2.3.6 OP 4.12: Involuntary Resettlement

The World Bank's safeguards policy on involuntary resettlement, OP 4.12, is to be complied with where involuntary resettlement, impacts on livelihoods and assets, acquisition of land or restrictions to natural resources may take place as a result of the project. It includes requirements that:

- Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.
- Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development projects, providing sufficient investment resources to enable persons displaced by the project to share in project benefits.
- Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement projects.
- Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

According to OP 4.12, the resettlement plan should include measures to ensure that the displaced persons are:

- Informed about their options and rights pertaining to resettlement.
- Consulted on, offered choices among and provided with technically and economically feasible resettlement alternatives.
- Provided prompt and effective compensation at full replacement cost for losses of assets attributed directly to the project.

If the impacts include physical relocation, the resettlement plan should include measures to ensure that the displaced persons are:

- Provided assistance (such as moving allowances) during relocation.
- Provided with residential housing, or housing sites, or as required, agricultural sites for which a combination of productive potential, location advantages, and other factors is at least equivalent to the advantages of the old site.

This project is not anticipated to have any major social risks relating to land acquisition and loss of livelihood. As such, it does not trigger OP 4.12 (Involuntary Resettlement).

The project activities include capacity building, disaster risk management, community engagement, citizen participation, and community monitoring. Sub-component 2B will however fund subproject determined by community participants in two (2) LCs through a PB sub grant of US\$300,000 per LC. Given the relatively small funding window, the project is not expected to generate subprojects with adverse social impact. The Project also excludes by design the acceptance of subprojects that would result in land acquisition.

2.3.7 Access to Information Policy

The policy on Access to Information provides for the disclosure of more information than ever before: on projects under preparation, projects under implementation, analytic and advisory activities (AAA), and Board proceedings. This information will be easily accessible on the World Bank's external website and available through the Info Shop, public information centres, and the World Bank Group Archives.

At the same time, the policy strikes a balance between maximum access to information and respect for the confidentiality of information pertaining to its clients, shareholders, employees and other parties. Recognizing that the sensitivity of some information declines over time, the policy provides for the eventual declassification and disclosure of restricted information over a period of 5, 10 or 20 years, depending upon information type.

2.4 Institutional Framework for Environmental Management

This Act (2008; Amended 2010) establishes the Environment Protection Agency, defines its functions and powers, provides for its organization and administration and provides rules for various matters regarding the environment in Sierra Leone. The Agency is established as a corporate body managed by Board of Directors and an Executive Director.

Part IV of the Act exclusively deals with the activities requiring a full Environmental and social impact assessment and describes the permitting processes leading to the acquisition of an environmental license.

The EPA-SL Board of Directors comprises the Executive Chairperson and Representatives drawn from the following ministries and the private sector:

- Ministry of Lands Country Planning and the Environment
- Ministry of Local Government
- Ministry of Mines and Mineral Resources
- Ministry of Marine resources
- Ministry of Agriculture, Forestry and Food Security

- Ministry of Tourism and Cultural Affairs
- Ministry of Trade and Industry
- Ministry of Transport and Aviation
- Ministry of Health and Sanitation
- Petroleum Unit
- Three persons from the private sector (commerce, finance and law).

The EPA-SL has a wide range of environmental management functions including coordination of the activities of government agencies and other agencies on matters relating to environmental protection and management. The EPA is also responsible for ESIA compliance and licensing (see section 3.1.3 for further details)

At present, the Executive Board serving as the governing body of the Agency, provides general policy guidance and advice as well as supervises the work of the Agency. The Executive Chairperson, who is responsible to the Office of the President, executes the Board policies and oversees the day-to-day- professional and administrative activities of the Agency. The Executive Chairperson is assisted by the Executive Director and three Deputy Directors. The three Deputy Directors are:

- Deputy Director, Policy, Planning and Research
- Deputy Director, Field Operations and Extension, working in partnership with District and Local Councils
- Deputy Director, Finance and Administration

2.5 National Environmental Policy Goals

The goal of the National Environmental Policy is to achieve sustainable development in Sierra Leone through sound environmental management.

2.6 National Environmental Policy Objectives

- Secure for all Sierra Leoneans a quality environment adequate for their health and well-being.
- Conserve and use the environment and natural resources for benefit of present and future generations.
- Restore, maintain and enhance the ecosystems and ecological processes essential for the functioning of the biosphere; preserve biological diversity and the principle of optimum sustainable yield in the use of living natural resources and ecosystems.
- Raise public awareness on environmental issues and promote understanding of the essential linkages between the environment and development, and encourage individual and community participation in environmental improvement efforts.

2.7 Strategies:

These strategies will be pursued in order to achieve the policy goals and objectives:

- (a) Establish and/or strengthen environmental protection standards, monitor changes in and publish relevant data on environmental quality and resource use
- (b) Manage environmental impact assessment (EIA) of proposed activities which may significantly affect the environment or use of a natural resource, and provide relevant information, in a timely manner, to persons likely to be significantly affected by a planned activities and grant them equal access and due process in administrative and judicial proceedings
- (c) Promote environmental management through the creation of administrative and infrastructure support with appropriate financial backing
- (d) Co-operate in good faith with other countries and agencies to achieve optimal use of trans-boundary natural resources and effective trans-boundary environmental protection.

2.8 Ministry of Lands, Country Planning, and the Environment (MLCPE)

The Ministry is responsible for conserving and managing Sierra Leone's natural environment. It is also responsible for addressing land acquisition and transfer, land ownership and use, and national development in a planning capacity. It provides advisory services to the public on land matters as well as physical planning and management of the forestry resources.

2.9 Ministry of Mineral Resources

Responsible for supervising mining operations in the country, the Ministry of Mineral Resource issues licenses for all mining operations and enforces laws and provisions contained in the Mining Act and its amendments. It is also responsible for enforcing provisions in the new Mining Act relating to the rehabilitation of mined-out areas. The main institutional conflicts are: (i) extent to which the ministry has jurisdiction over marine areas with respect to marine-based mineral resources, offshore dredging and its impact on marine resources and (ii) overlap of water quality monitoring with the interest of the Ministry of Marine Resources.

3.0 DESCRIPTION OF THE PROJECT

3.1 Description of JSDF -Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context

The EVD epidemic tested the effectiveness of service delivery at the community level and has led to revisiting the decentralization programs and redoubling efforts in this direction. LCs are good interlocutors with communities and their local knowledge can help them reach the most vulnerable population groups. The project seeks to build trust and intra-communal cohesion where it has been compromised, increase social mobilization, and make local social services more responsive to citizen needs in the post-EVD environment.

The two main objectives of the proposed grant include improvement of the quality and the adequateness of LC social services. These gaps will be filled by mobilizing resources in sensitization activities, developing social accountability and citizen feedback mechanisms, and by piloting innovative measures that stimulate monitoring of public services and allocation of resources at the local level closer to citizen priorities.

The Project has three interdependent components.

Component 1 - LC social sensitization activities. The component seeks to promote social cohesion and resilience through strengthening LC capacity and by implementing community-wide sensitization meetings, forums and health talks, diminishing the negative effects of Ebola on social trust and providing much needed support to the victims.

This component will help improve long-term social sensitization and community resilience in the post-EVD environment, building on interventions by MoSWGCA and international partners during the active transmission stage of the disease. Specifically, the interventions implemented under Component 1 will seek to engage citizens to promote social cohesion, trust, and collective efficacy. Social mobilization and community engagement are essential to reduce stigma towards individuals and households affected by EVD: aversion behavior by those not infected impedes a wide spectrum of economic and social activities and contributes to economic losses. This is in line with early recommendations by the GoSL encouraging institutional support to focus not only on victims, but also on the families and communities of affected victims, as dialogue with family members and peer groups is one of the main coping mechanism for survivors.

Component 2 - Tailoring LC service delivery through social mobilization. The component focuses on building community resilience in the two districts most affected by EVD by: i) creating social accountability and community monitoring mechanisms for

the effective delivery of social services; ii) promoting direct citizen engagement in the monitoring of LC services; and iii) piloting participatory budgeting.

Component 2 will support the deepening and expansion of social accountability mechanisms. Interventions will be carried out to strengthen trust in the beneficiary community, creating new opportunities for citizens to influence the direction of policy and generating social capital in the two districts most effected by EVD (Freetown and Port Loko). Local participatory monitoring will be promoted through open training to communities in a range of skills related to communications, advocacy and conflict resolution. Training will be provided in the form of workshops organized by RTFs, LC monitoring and evaluation (M&E) officers and ESOs, and will prioritize vulnerable groups when targeting potential beneficiaries. Workshops will clarify the nature and current services of LCs and present the various instruments available to citizens at the local level to participate in community life, instilling a sense of ownership over local public services. In addition, specific workshops tailored for capacity building of CSOs will be organized to ensure alignment with general Project strategies.

Participatory Budgeting (PB) is an innovative mechanism that aims to involve citizens in the decision-making process of local institutions by allocating resources to their preferred public sector activities. It is useful to align service delivery with the priorities of beneficiaries and can be instrumental in making the allocation of government resources more inclusive and equitable. The PB pilot in Sierra Leone will take place at the LC level, including all wards in the two (2) districts most affected by the EVD outbreak (Freetown and Port Loko), and is expected to enhance social mobilization. A PB subgrant with a total value of US\$300,000 will be allocated to each LC to be spent in the projects determined by community participants. A minimum participation threshold of 2,500 votes cast in each LC will be needed for the deliberation process to be considered valid, in order to avoid elite capture and to guarantee an acceptable level of community involvement. PB will be executed in several phases: (i) a public information campaign to promote PB is organized in district wards; (ii) ward deliberation processes to discuss proposals take place; (iii) proposals are compared at the LC level, costed, and options that are duplicated or not feasible are eliminated; (iv) public meetings at the ward level and a grassroots communication campaign are organized in order to inform citizens about proposed projects; (v) citizens vote for their preferred projects at the ward level; and (vi) projects with the highest support are implemented by the LC.

LCs will use the subgrant provided under this subcomponent to implement the proposals with support from the highest number of individuals in the district, regardless of their ward of origin. The proposal with most votes will be selected first, and its cost discounted from the total allocation of the PB subgrant. The process shall continue by selecting further proposals with cost values inferior to the remaining PB subgrant allocation, until all funds have been disbursed. This provides an incentive for wards to present projects with different costs in order to maximize chances of success

and obliges community members to have the interest of the locality in mind in order to receive a higher number of votes cast in favor of their proposal (rather than promoting the development of one or a few wards only).

Component 3 - Project management, M&E and knowledge management. The component focuses on the operational support geared towards project management, M&E and knowledge management.

IPAU will be the recipient of Project funds and will be in charge of coordinating procurement, financial management and auditing processes. During Project implementation, IPAU and DecSec will ensure the complementarity of activities pursued in relation to DHMTs, PERS, EERP and other relevant strategies in the fight against EVD. In this sense, permanent communication will be maintained with the MoHS so information on new EVD developments is retained and scientific evidences appropriately inform all activities under the Project. The support for these new interventions will serve to strengthen the devolution process (the transfer of functions and responsibilities from the central level to LCs). Moreover, LCs and MDAs will coordinate with the National Task Force for Devolution to ensure the alignment of services and activities in relation to the decentralization process.⁸ DecSec and IPAU have qualified staff to implement all activities specified under this section.

⁸ The National Task Force for Devolution is composed of members selected by the Minister of Local Government and Rural Development (MLGRD). Its aim is to engage key stakeholders in the devolution process across MDAs.

4.0 SIERRA LEONE BASELINE PROFILE

The project would be implemented nationwide and in all 19 Local Councils (LCs). A brief description of the country's physical and social setting is described in the sections below.

4.1 Methodology for Data Collection

Various techniques were applied for collecting data on the project environment. These included document review, institutional consultations, focus group discussions and field surveys of the existing environment. An account of the existing physical and biological environment and socio-economic conditions (ethnic groups, culture, economic activities, etc.) were assembled. These formed part of the baseline information and the information obtained used in the environmental analysis/assessment. Samples of the questionnaires and the outcomes of the consultations and stakeholder involvements are attached in the Annex1. The description of baseline information relevant to the project covers:

- Project district
- Land use categories
- Land acquisition and tenure system
- Socio-economic status
- Cultural resources
- Natural resources
- Air quality
- Wildlife and biodiversity
- Climate
- Health.

Sierra Leone is a small West African country located at latitude 8 300 N and longitude 11300 W, Bordered on the north and east by Guinea for about 652 km, on the south by Liberia for about 306km and on the west by the Atlantic Ocean. Sierra Leone has a total surface area of 71,740 sq. Km of which the total land area is 71,620 sq. km and 120 sq. km is water. The country got its name from the 15-century Portuguese explorer, who was the first to sight and map Freetown Harbor. The original Portuguese name of Serra Lyoa (ion Mountains) referred to the range of hills that surrounds the harbor. Sierra Leone can be divided into four distinct physical regions.

Coastal Swamp Region

This extends along the Atlantic for about 320 km. It is a flat, low lying, and frequently flooded plain that is between 32 and 64 km wide and is composed mainly of sands and clays. Its numerous creeks and estuaries contain mangrove swamps. Parallel ridges, often separated by silting lagoons, are common and sometimes form the actual coast.

Sierra Leone Peninsula

Freetown, the capital of Sierra Leone, is sited in this region, which has thickly wooded mountains that run parallel to the sea for about 40 km. The Peninsula Mountains rise from the coastal swamps and reach 888m at Picket Hill.

Inland from Coastal Plain

This is the interior plains region. In the north, it comprises featureless grasslands (savannah) that are known as "Bolilands" (*boli* being a Temne word for those lands that are flooded in the rainy season and hard in the dry season and on which only grass can grow). In the south, the plains comprise rolling wooded country where isolated hills rise abruptly to more than 200 m. The interior contains a variety of landforms ranging from savannah-covered low plains to rocky scarp and hill country. The plateau region, encompassing roughly the eastern half of the country, is composed mainly of granite with a thick laterite (iron-bearing) crust; to the west it is bounded by a narrow outcrop of mineral bearing metamorphic rocks known as the Kambui Schists. Rising above the plateau are a number of mountainous masses.

Loma Mountains (Northeast)

This is crowned by Mount Loma Mansa (Mount Bintimani) at 1,948 m (the highest point in Sierra Leone), and the Tingi Hills rise to 1,824 m at Sankanbiriwa Peak.

4.2 Climate

The climate is tropical and is characterized by alternating rainy and dry seasons. Conditions are generally hot and humid. Mean monthly temperatures range from **250 C** to 280 C in low-lying coastal areas; inland the range may be from **230 C** to **280 C**. In the northeast, where extremes of temperature are greater, mean daily minimums fall to 130 C in January, and mean daily maximums rise to **320 C** in March. During the rainy season, from May to October, humid air masses from the Atlantic dominate. Precipitation is greater on the coast than inland, with as much as 5,080 mm of rain fall annually on the Peninsula Mountains, while the northeast receives about 2,032mm a year. The mean annual and seasonal rainfall distribution pattern is as follows:

- Coastal areas receive more than 3,000 mm rain per year with the Western Area recording up to 5000 mm.
- North-central and south-eastern regions receive between 2,500 and 3,000 mm.
- The North receives from 2,500 to less than 2,000 mm.
- Distinctly higher rainfall values above 3000 mm are recorded around Makeni, Mabonto and Bumbuna areas presumably due to the relief influence of the Sula Mountain scarp to the east.

The dry season, from November to April, is characterized by the dry harmattan that blows from the Sahara. The rainy season tends to have cooler daily maximum

temperatures than the dry season by about 60 C. The relative humidity, however, may be as high as 90 percent for considerable periods, particularly during the wettest months, from July to September.

4.3 Soils and Hydrology

The country's drainage pattern is dense. Numerous rivers have their sources from the well-waters of the Fouta Djallon highlands of Guinea and flow in a general northeast to southwest direction across Sierra Leone. Their middle courses are interrupted by rapids that restrict navigability to only a short distance inland. River levels show considerable seasonal fluctuations. The drainage system has nine major rivers and a series of minor coastal creeks and tidal streams. From north to south, the principal rivers are the Great Scarcies, Little Scarcies, Rokel (which is known in its lower courses as the Sierra Leone River) Gbangbaia, Jong, Sewa, Wanje, Moa, and Mano. The Great Scarcies and Moa form portions of the border with Guinea, while the Mano River forms much of the country's frontier with Liberia. In most areas, the dominant soils are of the weathered and leached lateritic (iron bearing) type. Red to yellow-brown in color, they contain oxides of iron and aluminium and are acidic. Kaolin clays are important in some areas, and when cultivated a light, readily workable, free-draining soil results, whose productivity depends largely on the nutrients provided from the vegetation previously cleared and burned. In coastal plains lateritic soils developed on sandy deposits are agriculturally poor, but those derived from basic igneous rocks are somewhat better.

4.4 Natural Resources

Sierra Leone is a country blessed with abundant mineral resources, which include: diamonds, chromite, rutile (among the largest reserves in the World), iron ore, titanium ores, bauxite, columbite (a black mineral of iron and columbium) pyrochlore, gold, platinum, and manazite. Forests cover more than one-fourth of the country, the most important area of which is the Gola Forest Reserve, a tract of primary tropical rain forests, near the Liberian border.

4.5 Wetlands

The Convention on Wetlands came into force for Sierra Leone on 13 April 2000. Sierra Leone presently has one site designated as a Wetland of International Importance, which is the Sierra Leone River Estuary, with a surface area of 295,000 hectares. The Estuary, near Freetown Peninsula, is dominated by mangrove swamps, with lowland coastal plains to the north. As it enters the Atlantic Ocean, the estuary widens to 11 about 16km and deepens to form a natural harbor and is said to be the third largest in the world. Of Sierra Leone's total mangrove, 19 percent is included within the site. The site exceeds the 1 percent threshold for at least eight bird species, namely Ringed and Kentish Plovers, Sanderling, Curlew Sandpiper, Whimbrel, Greenshank and Redshank, and Western Reef Heron; and is a breeding habitat for some of these birds.

4.6 Socio-Economic Features

Sierra Leone is one of the poorest countries in the world, and its economic activity is largely influenced by the public sector. The economy has always been based on the exploitation of natural resources, notably agricultural, marine and mineral resources. The agricultural sector which accounts for 44.1 percent of the Gross Domestic Product (GDP).⁹ Agriculture has remained traditional and subsistence in character, incapable of satisfying the food needs of the country by a wide margin, and improving the living standards of the broad mass of the population. Over 70 percent of the country's labour force is employed in agriculture.

4.7 Population

The population of Sierra Leone is estimated at 7 million, growing at a rate of about 2.6 percent per year. The country's population is made of many ethnic groups the largest and most prominent being the Mende, Temne, Limba, Kuanko, Sisu, Yalunka, Loko, Mandinka, Kono, Kisi and the Creoles. The population density of about 58 persons per sq.km is relatively high as compared to other countries in Sub-Saharan Africa. The population is concentrated in some particular regions of the country including the Freetown Peninsula and the Kono, Kenema and Bo districts. The northern part of the country is sparsely populated. A large section of the population is unemployed, especially among the youth. An estimated 68 percent live close to the forest or forest regrowth area on which they depend for their livelihood.

4.8 Land Tenure

Land tenure in the Republic of Sierra Leone is characterized by a dual ownership structure. Land in the Western Area observes the English system of Freehold Interests. This area includes the capital city Freetown and is clearly distinguishable from the rest of the country by the level and quality of development. Land in the rest of the country 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. The result is a dichotomy between modernization and tradition. While in the Western Area interest in land can be assigned with little difficulty, in the Provinces the traditional authorities are unwilling to assign interests in land. A detailed description of the land tenure system follows.

Western Area

Land tenure in the Western Area traces its history from the British Colonial administration. The area settled by the freed slaves was declared a Colony of the British Empire, and the settlers, having lived in England and having experienced the English way of life and system of governance, were more inclined to live their lives like the British. As a result of this and other socio-political considerations, British concepts of tenure were introduced in the colony (Western Area). Since the land on which the freed

⁹ Government of Sierra Leone. *Economic Bulletin 9(2): March 2003.*

slaves were resettled was purchased in the name of the British monarch, the settlers were therefore tenants of the British Crown and the title passed on to them was the tenancy in fee simple or freehold. After independence in 1961 the Government of Sierra Leone replaced the crown as the “landlord” of the Western Area and the freehold system was allowed to persist.

Provinces

Land is communally held under customary tenure in the provinces with minor differences among the various ethnic communities. Land is deemed to belong to the family, comprised of departed ancestors, the living and the unborn. It is regarded as a divine heritage entrusted to the living with a responsibility to ensure its preservation and legacy to future generations.

Family Interests

The absolute interest in land is vested in families. The Paramount Chief is regarded as the custodian of the land on behalf of the entire Chiefdom, but decisions regarding land are the preserve of heads of families. The administration of the community interest is vested in the heads of the land-owning families, who are aided by a Council of Elders. Of important, every member of the family has an inherent right to occupy and use any part of the family land.

Individual Interest

Where a family member wishes to cultivate any part of the family land, he/she has to obtain special permission from the family head who would normally allocate land to him/her. In some societies, the individual has to pay (locally referred to as *kola* or “handshake”) to the family head as acknowledgement of the land granted to him/her. The grant, however, does not confer ownership of the land but only the right to use the land.

State or Public Lands

There are two types of State lands in Sierra Leone: Crown Lands and Government Reservations. Crown Lands are found in the Western Area while Government Reservations are found in the Provinces. Crown Lands are comprised of lands which have been acquired “for the service of the colony” under the Public Lands Ordinance, 1898.

5.0 POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

5.1 Methodology for Impact Identification

The following major stakeholders were consulted for role identification and for potential environmental and social impacts likely to arise from the implementation of Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context.

- Ministry of Finance and Economic Development
- Ministry of Local Government and Rural Development
- Ministry of Social Welfare, Gender and Children
- Ministry of Health and Sanitation
- Ministry of Lands, Country Planning and Environment
- Sierra Leone Environmental Protection Agency
- Department of Social Welfare
- National Youth Commission
- Local Government Finance Department
- Integrated Project Administration Unit
- National Lands Board
- Port Loko, Bombali, Koinadugu Local Council, and Freetown City Council.

5.2 Potential positive Environmental and Social Impacts

The impacts have been categorized into beneficial and adverse. Some of the potential positive impacts of the prospective subprojects are:

- Increase in the practice of subjecting development projects to environmental management processes by Local Councils (LC). The ESMF offers the opportunity to identify potential project impacts, mitigate them verifiably through monitoring while building capacity for environmental management within LCs, SLEPA, IPAU, and LGFD.
- Activities to be financed through the project (e.g., water supply facilities) will have significant positive impacts on health of the targeted beneficiaries.
- Provision of health infrastructure will help reduce the child mortality rate and contribute towards increasing the opportunities for an enhanced public health.
- Drainage systems to be provided under solid waste management will among other things reduce the incidence of water-borne diseases (e.g., malaria) and help reduce the incidence of flooding and settlement erosion.
- Use of local labor will provide organic income earning.

5.3 Potential Adverse Environmental and Social Impacts

The Project interventions under Component 2 the proposed Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context are likely to have site-specific environmental impacts both at the construction and post-construction phases. The respective assessment is as follows:

5.3.1 Construction Phase

The construction phase activities may include: site clearing, excavation and grading, upgrading of access roads and drains, installation of utility services (electricity and water). The post-construction phase activities include rehabilitation and maintenance activities. The potential adverse impacts of the constructional and post-constructional civil works activities are shown in Table 4 below.

Table 4: Environmental and Social Impacts of Civil Works

| <i>Potential Impacts</i> | <i>Potential Source/Cause</i> | <i>Environmental/Social Significance</i> |
|---|---|--|
| Constructional Phase (Environment) | | |
| Construction waste | Waste from bush clearing, removal of trees, excavation of soils and redundant materials during site preparation and pulling down of dilapidated structures during rehabilitation. | Minor |
| Water pollution | Sediment-laden runoff from exposed areas mainly due to vegetation clearing during construction. Improper use of waste oils from construction equipment. Improper disposal of sanitary waste from work camps. | Moderate Minor Moderate |
| Air quality | Particulate (dust) from site preparation, haulage of plant and equipment and constructional materials. | Moderate |
| Noise pollution | Movement of heavy vehicles. | Minor |
| Soil erosion and land degradation | Exposed land surfaces from cleared vegetation may induce erosion from rain events. Site-levelling activities may disrupt the natural drainage pattern. | Moderate |
| Loss of flora/ fauna | Site preparation entails the removal of vegetation. | Minor |
| Constructional Phase (Social) | | |
| Occupation health and public safety | Badly managed work activity/ site within a community. Poor housekeeping leading to stagnant water as breeding grounds for insect vectors (causing malaria, etc.). Movement of heavy trucks and equipment and the actual construction may expose workers and community members to accidents. | Moderate Moderate Moderate |
| Land use | Conflicts with incompatible activities and land uses. | Minor |
| Raw material usage | Timber, sand, stones from local and external sources (quarries, etc.). | Major |

| <i>Potential Impacts</i> | <i>Potential Source/Cause</i> | <i>Environmental/Social Significance</i> |
|---|--|--|
| Socio-economic | Destruction of property- farm crops, structures. Community convenience vs. consultant's technical judgment for chosen sites. Visual intrusion by heavy trucks and equipment. Disruption of social activities. | Moderate Moderate Minor Minor |
| <i>Post-Constructional Phase (Environment)</i> | | |
| Water quality and pollution | Sediment-laden storm runoff, contamination from poor sanitary conditions and domestic waste dumping and inadequate provision and inappropriate method of storm water disposal due to poor drainage. | Major |
| Visual intrusion | Domestic refuse and other waste pose health risks and aesthetic problems from poor sanitary conditions. | Major |
| Noise pollution | Movement of heavy vehicles carting food stuff, etc. | Minor |
| Soil erosion and land degradation | Erosion may be induced or enhanced by vegetation clearing. | Moderate |
| <i>Post-constructional Phase (Social)</i> | | |
| Public nuisance and health risks | Poor hygienic conditions may arise from poor facility maintenance leading to breeding of mosquitoes and rodents. | Moderate |

6.0 ENVIRONMENTAL AND SOCIAL IMPACTS MITIGATION PRINCIPLES

The Environmental and Social Impacts Framework (ESMF) offers options and principles for preventing, minimizing or managing various environmental and social impacts as an integral part of the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context planning and management. This section provides impact mitigation principles for the potential adverse project impacts identified in Section 5. All significant negative impacts will be considered for mitigation. The mitigation measures will be applied to significant impacts arising from construction, operation and maintenance aspects of the various subprojects. General measures/principles are outlined below:

6.1 General Mitigation Measures/ Principles

- Community participation and involvement;
- Sensitization of the people prior to commencement of subprojects on their roles, contract specifications, and mechanisms for addressing grievances;
- Signing of contract in communities;
- Posting notices in communities at easily accessible locations;
- Using the media (radio, social media, etc) to disseminate information; and
- Using graphics or pictures to disseminate information on the negative and positive impacts of the project.

6.1.1 *Air Quality (Particulate Emission/Dust Abatement) Management Principles*

Implementation of the following principles will control air pollution:

- Ensuring effective use of water to control dust emission during construction
- Mounting speed control signals and ramps
- Including dust control measures in contract specifications
- Covering of sand heaps (or hauling trucks carrying sand) to avoid dust emission
- Reducing impacts of emissions by adhering to the following principles:
 - Promoting the culture of vehicular maintenance
 - Checking air emission specifications for all equipment before purchase.

6.1.2 *Cultural Resources Preservation Principles*

- Handing over cultural resources uncovered during works to the National Museums and Monuments Board (NMMB) for preservation and/or preservation of the site.
- Marking and fencing important cultural sites during work periods.

6.1.3 *Constructional Waste Generation and Management Principles*

Waste management mitigation principles will include:

- Disposal of construction and related waste materials at designated/approved dump site
- Adoption of waste minimization measures
- Incorporation of waste management plan in contract specifications
- DAs to enforce appropriate sanitation and related bylaws
- Worker awareness program to observe proper waste management measures.

6.1.4 Landscape Improvement Principles

A number of management principles to protect the soil and landscape will include:

- Prompt reclamation of degraded lands (e.g., burrow pits)
- Specifying erosion control, spillage prevention as the obligation of the contractor
- Erection of intercepting ditches at the tops and bottoms of slopes, with gutters and spillways used to control the flow of water down a slope
- Emergency response procedures for spillages.

6.1.5 Water Resource Protection Principles

Mitigation principles to prevent, minimize and manage impacts on water resources will include:

- Providing settling basins to remove silt, pollutants and debris from construction run-off before discharge to adjoining streams or rivers
- Constructing run-off channels, contouring or other means of erosion control
- Paving sections of areas susceptible to erosion
- Compensating by providing alternative source of water (e.g., bore holes) for communities adversely affected.

6.1.6 Occupational Health and Safety Principles

Highlights of the principles to be followed by contractors are set out below, based on ILO guidelines.

- HIV/ AIDS prevention clauses will be incorporated into works contracts
- Ethical principles in handling persons with medical conditions will apply
- Relations with infected/potential workers will be governed by the basic human rights as enshrined in the Constitution of Sierra Leone
- Refusal of employment or dismissals will not be based on HIV status
- HIV/ AIDS prevention and treatment guidelines for community/workplace will be prepared
- Due care and confidentiality will be exercised in handling information on HIV status of workers
- Prevention programs on HIV by contractors will include:
 - Education and information provision

- Peer counselling
- Condom use, promotion and distribution
- Facilitation of voluntary counselling and testing.

6.1.7 Gender Impacts Mitigation Principles

DSDP II and Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context will ensure that the adverse impact on women and children due to the project are minimized or completely eliminated. Measures that will be taken are:

- Provision of opportunities for employment of women
- Negative impacts on women identified and mitigated
- Promotion of women empowerment programs
- Facilitation of education for children.

Relevant community consultations should be undertaken in a gender sensitive manner in a way that is in line with cultural norms. Women should be included in consultations regarding subproject identification and prioritization, and in discussions regarding land use. Women may use land that may appear vacant as land for planting food, collecting medicinal plants and other products.

Consultation forums should:

- Include women-only discussions and women-led discussions as necessary.
- Require, where necessary, active outreach to ensure women in the community are aware of consultations and available to attend.
- Convene at a time in the day when women do not have other family and social obligations.
- Provide participants with relevant project information in a form and language that they understand.
- Ensure, where possible, links with the women's representative on the Ward Committee.
- Partnerships with local organizations may be necessary to ensure the achievement of gender inclusion and the avoidance of disproportionate impacts on women.

6.2 Resettlement Principles ¹⁰

Mitigation principles to address resettlement issues include:

¹⁰ This will only be used for temporary restrictions to livelihoods.

- Explore all viable alternative project designs to avoid where feasible or minimize involuntary resettlement.
- Conceive and execute, where not feasible to avoid, resettlement activities as sustainable development programs, providing sufficient investment resources to enable persons displaced by the project to share in project benefits.
- Provide displaced persons meaningful consultation and opportunities to participate in planning and implementing resettlement programs.
- Assist displaced persons in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.
- Inform displaced persons about their options and rights pertaining to resettlement.
- Provide prompt and effective compensation at full replacement cost for losses of assets attributed directly to the project.
- Provide assistance (e.g., moving allowances) during relocation.
- Provide residential housing, or housing sites, or as required, agricultural sites for which a combination of productive potential, location advantages and other factors is at least equivalent to the advantages of the old site.

7.0 ESMF IMPLEMENTATION AND MANAGEMENT

The successful implementation of the Environmental and Safeguard Management Framework (ESMF) depends on the Environmental and Social Specialist (ESS) officer, Decentralization Secretariat (DecSec) of Ministry of Local Government and Rural Development (MLGRD), the Environment and Social Officers (ESO) located in Local Councils (LCs) and the Resident Technical Facilitators, beneficiary Local Councils, communities, contractors, and supervising consultants, as well as capacities within these institutions and the institutional collaborative arrangements between them. This section presents the institutional arrangement, capacity building and budget provision necessary for the ESMF implementation and monitoring and reporting arrangements.

The Local Councils with technical support from the ESS and Environmental the ESOs will be responsible for the Environmental and Social Impact Assessment (ESIA) and for securing the required permits for the subprojects. The cost of the ESIA and securing the permits for follow-up compliance and enforcement activities will be included in the costs estimates for the subprojects. The ESO will take a lead role in the coordination of all safeguards implementation activities in close collaboration with the Decentralization Secretariat, Local Government Financing Division (LGFD) and Integrated Project Administrative Unit (IPAU).

The Environmental and Social Officers (ESO) will coordinate all ESMF implementation activities at the LC level under the guidance of the ESS in conducting the initial subproject ESIA (using the customized form as in the Annex). The ESO will liaise with the ESS for submission of the completed assessment forms to the Sierra Leone Environmental Protection Agency (SLEPA), and for SLEPA inspections and other processes leading to granting of the permit for subprojects.

Other arrangements regarding the implementation of the ESMF are listed below.

7.1 Institutional Arrangement and Inter-agency Coordination

The Ministry of Local Government and Rural Development (MLGRD) and Ministry of Finance and Economic Development (MoFED) will have oversight responsibility for safeguards compliance issues during and the implementation phase of Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context. Cross-collaboration will be carried out with the Ministry of Works, Housing and Infrastructure (MWHI) and the Ministry of Lands, Country Planning and the Environment (MLCPE).

7.1.1 Sierra Leone Environmental Protection Agency

The Sierra Leone Environmental Protection Agency (SLEPA) initially will clear the safeguards frameworks but the frameworks will be subject to final clearance from the World Bank. The consultant and the World Bank Environment Specialist and Social Development Specialist, with support from SLEPA, will be responsible for ensuring appropriate inclusion of safeguards procedures in the project operational manual, reviewing investment plans for compliance and monitoring of safeguards performances. SLEPA, being the GoSL regulator for the environment, will screen and approve all prospective subprojects in line with the provisions in EPA Act, 2010.

7.1.2 Decentralisation Secretariat (DecSec)

The Environmental and Social Officers will be responsible for therein-house screening of subprojects using the forms in Annex 2 and for monitoring the safeguards performance at the LC level. The ESS will be responsible for validating the completed in-house E&S Checklist and ensure that suitable training programs are organized to enhance the capacity of all key stakeholders. Safeguards issues will be specifically addressed in project reporting formats and on the basis of work plans. The ESO will assist in identifying activities at the LCs where safeguards issues are a particular risk, and focus its monitoring and technical backstopping activities on those areas.

7.1.3 Local Councils

There are 19 LCs established by the LGA (2004), of which 13 are district LCs and 6 are Municipal City Councils. Members of LCs and their chairpersons were first elected in 2004 and again in 2008. In the context of the Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola, the responsibilities of the LCs include:

- Drafting the annual Subsidiary Agreement between MoFED, MLGRD, and LCs based on district work plans and budgets and the Medium-term Expenditure Framework and co-sign it.
- Updating the annual work plan and budget.
- Carry out operational tasks such as planning, supervision, and financial management.
- Submitting reports to LGFD including monthly reconciliation of expenditures and supporting documentation as per Agreements.
- Reporting on a quarterly basis on the actual use of grants, including overall performance in relation to service delivery targets as discussed in the annual tripartite Subsidiary Agreement.
- Reporting on the implementation progress of LC Subsidiary Agreement to constituencies through town hall meetings and other means to increase transparency and accountability at the local level.
- Participating in an annual assessment of agreed indicators as per the LC Subsidiary Agreement.

- Ensuring the use of results based contracts with service providers under Component 1 and respond to Ward Committee grievances as well as facilitate the implementation of social accountability and community monitoring mechanisms under Component 3.

7.1.4 Roles of Non-Governmental Organizations

Among the non-governmental organizations, environmental and social advocacy groups have become key players in the assessment process. In general, they work closely with communities and better understand a project's socio-economic repercussions on the constituents.

During project preparation, consultations were held with environmental and advocacy groups. They proved to be reliable sources with regard to existing land use and associated problems, economic status, ecological resources and respective vulnerabilities, and likely effects on the communities. These NGOs will assume the following roles in the EMSF:

- Create awareness of the project in the community
- Act as a interlocutor for the communities with regards to the project
- Participate in public consultations and hearings
- Monitor the implementation of the project and report back to the communities.

7.1.5 Contractors

The role of the contractor will include:

- Developing a work plan and budget based on the E&S safeguards
- Submitting workplan and schedule to LGDF
- Training/creating awareness for all personnel and communities on relevant E&S safeguards measures
- Submitting implementation report on E&S safeguards to LGDF.

Copies of the guidelines in Annex 5 will be provided by the IPAU/LGFD in order to facilitate compliance.

7.2 Resettlement Policy Framework (RPF)

This project is not anticipated to have any major social risks relating to land acquisition and loss of livelihood. As such, it does not trigger OP 4.12 (Involuntary Resettlement). The project activities include capacity building, disaster risk management, community engagement, citizen participation, and community monitoring. The Project also excludes by design the acceptance of subprojects that would result in land acquisition, hence no Resettlement Policy Framework (RPF) was prepared under the project and no additional Resettlement instrument will be required for the project.

7.3 Community Participation

Community participation guidelines and indicators in the results framework will be used as a mechanism to track and ensure that community participation at the Ward level is being fostered. The use of community scorecards will also engage communities in monitoring and reflect community views on service delivery. In addition, community participation will ensure community inclusion in the implementation of safeguards.

7.5 Capacity Building Requirements

In-country capacity for environmental and social monitoring is weak in spite of establishing SLEPA; there is still the urgent need for capacity improvement given the attention on safeguards implementation as a sustainability factor for projects. Furthermore, the DSDPII intends to mainstream the implementation and monitoring of safeguards into project activities from the community-district to national level. This will require some sensitization and capacity building for all key stakeholders. The capacity building requirements will mostly be in the form of a training workshops and on the job training. In particular, training workshop on the ESMF/ESMP should be organized for the following:

- SLEPA
- DecSec, LGFD and IPAU of MOFED
- ESOs (located to LCs)
- Project consultants and contractors.

The capacity of staff at the SLEPA will further be enhanced at the district level to provide guidance and ensure adequate overall environmental and social supervision of the subprojects.

7.6 Awareness Creation

To understand conditions that trigger environmental and/or social action, stakeholders will need training. It is proposed that environmental and social management issues be included in: (i) all monthly project site meetings; and (ii) discussions at all project review/evaluation workshops to further-sensitize stakeholders.

The discussions will help in assessing environmental and social progress, especially with regard to the effectiveness of implementation of mitigation measures. Knowledge on environmental and social issues at the district and community levels also needs to be promoted. The respective SLEPA/ESO would be the best vehicle. It would assist community members in identifying their existing environmental and social concerns; provide community members with information about any proposed subproject; and help them analyze the environmental consequences of the intended subprojects.

7.7 Budget for ESMF Implementation

The table below describes the budget estimates for the implementation of the ESMF. The estimates are built on the assumption that some capacity was acquired from previous project experiences by DecSec, LGFD/IPAU and SLEPA.

Table 5: Proposed Budget for ESMF Capacity Building Implementation Activities

| <i>No.</i> | <i>Institution</i> | <i>Capacity Gaps Identified</i> | <i>Capacity Building Measures</i> | <i>Rate</i> | <i>Estimated Cost (US\$)</i> |
|------------|--|--|--|---------------------------------|------------------------------|
| 1. | Strengthen SLEPA and LCs capacities to effectively handle environmental and social safeguards issues | Inadequate number of staff at the regional offices and LCs | Organize at least four regional workshops | US\$12,000 per workshop | US\$47,082 |
| | | Inadequate know-of project cycle | Training in SEA and project cycle review (5 days for 5 persons per regional office for 3 regions) | US\$40/ per person per day | US\$10,000 |
| | | Lack of staff to coordinate environmental and social safeguards agenda | Establish safeguards desks in 19 LCs and equip them with computers, printers and digital cameras | <u>US\$10,000 per LC</u> | US\$190,000 |
| | | Inadequate knowledge of LCs and WCs on safeguards issues | Train resident technical facilitators in safeguards techniques for effective backstopping of LCs contractors | | US\$40,000 |
| | | | Prepare user-friendly technical manuals on safeguards management | | US\$25,000 |
| | Sub-Total | | | | US\$312,082 |
| 2. | DecSec and IPAU | Inadequate knowledge of staff in environmental | Organize training course in safeguards management, | | US\$30,000 |

| | | | | | |
|----|-------------------------------------|--|--|---------------------------|-------------|
| | | and social safeguards principles for physical subprojects | labor standards, contract management (5 days for 5 persons per regional office) | | |
| | Sub-Total | | | | US\$30,000 |
| 3. | Ward Councils and Chiefdom Councils | Lack of awareness among community members on the workability of safeguards in physical subproject implementation | Sensitization of Ward Council / Chiefdom Council members on | US\$5 per person per day | US\$50,000 |
| | Sub-Total | | | | US\$50,000 |
| 5. | Contractors | Inadequate capacity in mainstreaming safeguards issues in design and implementation of subprojects | Technical training in the use of ESMF in planning and design phase of physical subprojects | US\$40 per person per day | US\$15,000 |
| | Sub-Total | | | | US\$15,000 |
| | TOTAL | | | | US\$407,082 |

7.8 ESMF Implementation, Monitoring and Reporting

Monitoring during project implementation is a key component of the ESMF. It is essential that the basis for the choices and decisions made in the subproject design and other E&S safeguards measures implemented be verified. Monitoring will verify the effectiveness of impact management, including the extent to which mitigation measures are successfully implemented. Periodic monitoring of the general project and the specific subproject activities will help to:

- Improve environmental and social management practices
- Check the effectiveness of the MLGRD/MoFED oversight responsibilities
- Identify project problem areas early on
- Provide the opportunity to report the results on safeguards, impacts and mitigation measures implementation.

Table 6 provides environmental monitoring indicators to assess the effectiveness of the institutional arrangements and the mitigation measures implemented.

Table 6: Environmental Monitoring Indicators

| Type of Impact/ Issue | Monitoring Indicators |
|--|--|
| Screening of Sub-projects | Number of screened sub-projects by ESOs Number of completed screening checklist by ESOs Number of validated screening checklist by ESS |
| Registration of projects with SLEPA | Number of proposals successfully submitted to SLEPA by LCs. Number of projects registered by SLEPA. Length of time between submission and registration by SLEPA. |
| Solid Waste Management Infrastructure | |
| Water quality and pollution | Availability and number of temporary storage containers for sanitary and cleaning wastes including waste oils. Design provisions for temporary sediment barriers on slopes to prevent silt from entering the watercourse. |
| Soil erosion | Constructed appropriate erosion-protection measures. |
| Public health problems | Availability and number of sanitary facilities for workers. Number of local laborers and other workers. Number of environmental and safety meetings with workers. |
| Safety of the public | Number of reported cases of accidents involving general public and related to works. |
| Occupational health and safety | Number of recorded accident cases. |
| Air pollution | Speed control ramps with appropriate road signs. |
| Sustainability of provided facility | Length of feeder road constructed. Time taken to repair damaged roads. Number of reported water-related diseases and malaria cases. Incidence and severity of flooding. |
| Socio-economic | Number of local youth employed. Number of women food vendors. Number of community members supplying sand and stones. |

7.9 Institutional Arrangements for Monitoring

The proposed institutional arrangements for monitoring the ESMF implementation processes and the mitigation measures are as follows.

- The ESS supported by qualified and experienced consultants and in close collaboration with IPAU of MOFED will be responsible for E&S oversight and monitoring.
- The ESO assigned to the LCs and the Resident Technical Facilitator will ensure that contractors adhere to the E&S safeguards.
- For the Contractor to successfully carry out his/her obligations on E&S safeguards, a designated supervisor/foreman will be employed to monitor and report progress on E&S compliance to the LCs through the ESO on monthly basis.
- Local Councils will submit bi-monthly E&S monitoring reports to the EPA and DecSec and copy LGFD and IPAU.
- The E&S monitoring reports of all participating LCs will be collated by the ESS and submitted to the Director of DecSec for the attention of the IPAU.

8.0 Grievance Redress Mechanism (GRM)

The three-tier GRM is designed to channel and address grievances, questions, concerns, and complaints related to the project from citizens to the project implementers (local councils, ward committees, project Level).

The following sub-sections describe the project-wide Grievance Redress Mechanism for DSDP Phase II and Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context. It is envisaged that questions, concerns, complaints, and grievances will emanate during implementation and this mechanism will serve as a conduit for the project beneficiaries to raise questions, concerns, complaints, and grievances related to the project with the project implementers at the local and national levels.

Definitions

The mechanism described in this section will be referred to as a Grievance Redress Mechanism (GRM). However, it is designed to channel and address grievances, questions, concerns, and complaints related to the project from citizens to the project implementers (local councils, ward committees, project management team etc).

GRM Target Group

The primary target group for the GRM will be community beneficiaries. Secondary target groups will include other stakeholders in the decentralization process such as civil society organisations, community-based organizations, etc.

Causes of Questions, Concerns, Complaints, and Grievances

Users of the GRM will have a wide range of questions, concerns, complaints, and/or grievances. This list may include, but will not be limited to:

- **Questions** on project implementation such as scheduling, procurement of contractors, identification of sub-projects financed through the Local Council Grants, etc.
- **Concerns** regarding contractor performance, location of sub-project sites, relevance of identified sub-projects, unavailability of resources at sub-project sites such as medicine at rehabilitated clinics, distribution of teaching and learning materials, quality of works, etc.
- **Complaints** regarding delays in sub-project implementation, accessibility of project information, environmental events, land valuation processes, non-functioning sub-projects (e.g. wells), etc.

- *Grievances* related to levels of compensation for land acquired under the project, resettlement of land users from land acquired under the project, sub-project prioritization process, etc.

GRM Procedures

The GRM allows for questions, concerns, complaints, and grievances, where necessary to be received by the project team directly, investigated, recorded, and resolved. The framework for procedures is as follows.

Receipt of questions, concerns, complaints and grievances

Community beneficiaries and others will transmit questions, concerns, complaints, and grievances to the Ward GRM Committee members, specifically the Ward Secretary of the Committee. The Ward Secretary will take responsibility for recording and informing complainants on progress in resolving their complaints, whilst the Councillor will chair committee meetings c c).

If necessary, in particular where people are concerned that raising grievances will lead to retribution, grievances¹¹ can be transmitted to third parties who would then transmit the grievances to the Ward Committee or as necessary the National Grievance Redress Committee (NGRC). Examples of trusted third parties are: churches, NGOs, legal aid organizations, rights-based NGOs operating in the community, etc.

Ward Committees will establish a simple process to receive concerns directly and, if necessary, anonymously or through third parties. Procedures that are convenient, culturally appropriate, simple to understand, and easy to use will be developed.

All complaints received by the Ward Committee will be recorded and logged into a Complaints Register.

Sorting and processing grievances

Ward Committee Level (Ward Grievance Redress Committee)

Questions, concerns, complaints and grievances that can be immediately answered, addressed, and/or resolved by the Ward Committee will be thus resolved.

For all other questions, concerns, complaints and grievances, the Ward Committee will be encouraged to undertake an investigation to determine and confirm/deny necessary details. The Ward Committee will assign a committee

¹¹ This sub-section uses the term grievance to include questions, concerns, complaints and grievances.

member to undertake the investigation. The investigation will not exceed a period of 7 days.

After investigation the grievance will be directed to relevant officers so that they can be answered, addressed, and/or resolved. Methods to be employed to address and/or resolve grievances will include, but will not be limited to, mediation, arbitration by traditional authorities, and problem solving. Entities that may be called upon to assist with these processes may include, but would not be limited to, Chiefdom Councils, the Environmental and Social Officer and the Resident Technical Facilitators on the Local Council, pastors, imams, heads and principals of local educational establishments, and doctors or traditional healers. All methods to be employed will be acceptable to all parties and will use time-tested and respected traditional norms and practices that are culturally appropriate.

When grievances are not answered, addressed and/or resolved at this level, the Ward Committee will make a determination on whether or not to direct the grievance to the Local Council or to the NGRC. This determination will be based on how serious the grievance is (grievances related to involuntary land acquisition or environmental events, for example, would be referred directly to the NGRC) and the potential impact of the grievance on project implementation.

In the event the complainant is not satisfied with a resolution at the Ward Level, he/she has the freedom to appeal for further intervention from the CRC for review and resolution. Referral of the grievance to the Local Council should be recorded in the Complaints Register and the complainant informed.

The processing of grievances at this level (resolution or referral) will not exceed 21 days.

Specifically, the WGRC will:

- 1) Mobilize community members during EVERY council activity implemented in the communities, for introductory meetings and sensitization about the intervention's aims and objectives.
- 2) Inform beneficiaries about the existence of a GRM, its role and the process of seeking redress, recording their grievances and forwarding them in case grievances need further adjudication.
- 3) Undertake field investigations if necessary to determine necessary details on reported complaints. The investigation & resolution will not exceed a period of 7 working days.
- 4) Maintain confidentiality of the complainant.
- 5) Submit monthly reports to the Complaints Review Committee (CRC) at the Local Council on complaints received and actions taken.

- 6) The Ward Secretary will record grievances received on the Grievance Register and Complaints Forms (see annex) to ensure that relevant details on the complaints/concerns are captured.
- 7) The committee can escalate the complaint to the CRC if it is unable to resolve the matter

Local Council Level (Complaints Review Committee)

Questions, concerns, complaints and grievances that cannot be answered, addressed, and/or resolved by the Ward Committee will be channelled to the Local Council and the committee will receive complaints, questions etc directly. The management of grievances at the Local Council level will be chaired by the Deputy Chief Administrator whilst the Monitoring and Evaluation Officer (M&E Officer) of the local council will act as Secretary. They will be expected to work closely with the RTF, Environmental Officer, IEC Officer, 1 religious rep, and the Environmental and Social Officers.

Methods to be employed to address and/or resolve grievances will include, but will not be limited to, mediation, arbitration by traditional authorities, problem solving, and consultation with relevant entities and line agencies. Entities that may be called upon to assist with these processes may include, but would not be limited to, Chiefdom Councils, the Environmental and Social Officer and the Resident Technical Facilitators on the Local Council, pastors, imams, heads and principals of local educational establishments, and doctors or traditional healers. As necessary, ward committees and Chiefdom Councils will provide input for Local Councils. All methods to be employed will be acceptable to all parties and will use time-tested and respected traditional norms and practices that are culturally appropriate.

When grievances are not answered, addressed and/or resolved at this level, the Local Council will refer the grievance to the NGRC.

Referral of the grievance to the NGRC should be recorded in the Complaints Register and the GRM Database and the complainant informed.

The processing of grievances at this level (resolution or referral) will not exceed 21 days.

The CRC will specifically:

- 1) Meet to review grievances and resolve cases escalated from the communities and cases received directly.
- 2) Receive and consolidate grievances
- 3) Record, investigate, and solve appeals on grievances from the ward level
- 4) Send monthly reports to the NGRC

- 5) Conduct review and classify grievances
- 6) Inform complainants on progress of action(s) taken to resolve their grievance.
- 7) Ensure grievances reported through different channels are reviewed and entered into the district grievance database;
- 8) Escalate cases as needed to the NGRC;
- 9) Participate in community sensitization
- 10) Participate in relevant training programmes

Project Level (National Grievance Redress Committee) NGRC

Questions, concerns, complaints, and grievances that cannot be answered, addressed, and/or resolved by the Local Council will be channelled to the Project Management Team, in particular the GRM Officer. **The Grievance Redress Officer** will be appointed by DecSec to handle all administrative grievances related to the project.

The GRM Officer of the NGRC will work closely with other team members, including the Environmental and Social Specialist and the Resident Technical Facilitators to address and resolve grievances whilst keeping members of the NGRC informed. Depending on the nature and severity of the complaint or grievance, the NGRC will be fully involved to address or solve the complaint. Entities that may be called upon to assist with these processes may include, but would not be limited to IPAU, LGFD, DecSec, EPA, and MOFED.

This Committee will include: the M&E Manager; Capacity Building Manager; GRM Officer; 1rep LGFD; 1 rep IPAU; 1 rep from CSO, 1 rep from the press and 1 religious rep. This committee will be chaired by the CSO rep and the GRM Officer will act as Secretary.

The processing of grievances at this level will not exceed 14 days.

Conclusion of the process should be recorded and the complainant informed.

Specifically, the committee will:

- 1) Meet to review all cases received and resolved
- 2) Supervise the GRM Officer
- 3) Work with DecSec in planning, carry out national sensitization of the GRM and build the capacity of the district and ward committee members
- 4) Ensure the necessary resources are provided to the committees and officers involved in the GRM
- 5) Escalates cases out of the mandate of this GRM to the ACC, ombudsman for investigation and action.
- 6) Ensure that complainants receive feedback in a timely manner.
- 7) Reviews the monthly report of the GRM Officer.

- 8) Prepare and submit reports to management during management meetings.
Support the district and ward committees to resolve complaints, particularly where they involve national contractors, such as payment or other service providers, and be responsible for national level resolution of problems.

Recourse

If grievances are not resolved by the NGRC, the complainant can pursue alternative legal actions.

Database storage and tracking of information.

The GRM database will be developed at the council level and consolidated at the national level. It will be accessed for preliminary review and screening of complaints received. Users will be able to: (1) view complaints, (2) enter new complaints into the system, (3) classify complaints, (4) update what action has been or is being taken, and (5) update the status of the complaint, for example whether it is “open”, “closed”, solved, unsolved etc.

At the District and National levels, the GRM Officers of the CRC and NGRC will be responsible for updating the GRM database with cases that they receive, and also for tracking resolution of these complaints and all other administrative complaints received through the system.

Information Dissemination

To ensure that the system functions effectively, IPAU & DecSec IEC Units will develop a comprehensive communications strategy (under Component 3 of the project) through which the project will publicize the existence of the GRM, its procedures, beneficiary service standards and the levels at which different types of grievances, concerns, complaints, and questions should be addressed. The primary target for the communications strategy will be all project beneficiaries. Care will be taken to reach those who may be illiterate, lack access to technology, or those who may lack knowledge of basic rights.

Community-specific communication strategies will be deployed to allay fears about, and increase comfort levels with, submitting grievances, ensuring that there is no formal or informal charge for making grievances, and treating grievances confidentially. Ward Committees will work with community-based organisations to drive home the required and relevant messages that will enhance the overall effectiveness of the grievance redress process.

Given the fact that Ward Committees are formal governmental structures already in existence with responsibility for engaging with communities, their

capacity to record, sort and facilitate questions, concerns, complaints, and grievances will be strengthened.

Roles and Responsibilities

GRM Officer, NGRC will:

- 1) Review the GRM database on a daily basis to assess incoming administrative complaints, and ensure they are being followed up or resolved by the relevant officers.
- 2) Ensure the database is updated to track resolution of cases, and follow up with key stakeholders where there are delays or problems.
- 3) Coordinate work and liaise regularly with District CRC committees
- 4) Respond to information related to reported cases e.g. queries about unfinished structure, information requests raised by civil society on program eligibility etc.
- 5) Support the committee on any other major problems impacting project performance, such as delays or problems in delivery of services.
- 6) Produce minutes for meetings

Environmental and Social Specialist will:

Participate, as necessary and relevant, in resolution procedures, in particular those related to environmental, land use, and social issues.

GRM OFFICER, CRC

The Local M & E Officer will serve as Secretary and GRM Officer in Level Two (2). He will:

- 1) Register complaints, grievances etc
- 2) Keep tracker on case status and progress
- 3) Keep the complainants informed of progress
- 4) Monitor the implementation of settlements
- 5) Retrieve data for reporting purposes
- 6) Monitor suggestion boxes, websites and other channels of communication
- 7) Update Local Council database and provide data
- 8) Review and compile GR reports from the Wards
- 9) Produce and submit monthly updates to DecSec
- 10) Produces minutes for every session

Resident Technical Facilitator

Work closely with GRM Officer, CRC and ESO to manage documentation, track grievance patterns by analyzing grievance data, monitor and report on implementation of mechanism.

Environmental and Social Officer – Local Council

Participate, as necessary and relevant, in resolution procedures, in particular those related to environmental, land use, and social issues.

Ward Committee – Ward Secretary

The Secretary of the Ward GRM is the GRM Officer in Level One. He will:

- 1) Register complaints in the relevant forms and maintain files
- 2) Provide assurance to complainants that their cases will be handled
- 3) Work on implementing settlements
- 4) Keep a tracker on progress in resolving a complaint or grievance
- 5) Refer any case to the Local Council that cannot be handled or with a dissatisfied Complainant
- 6) Report to the GRM Officer, CRC on documented cases
- 7) Oversee the settlement of complaints

Ward Committee Members

Receive questions, concerns, complaints, and grievances and channel them to the Secretary General and the Chairman (the Councilor).

Participate, as necessary and relevant, in resolution procedures.

Costs

The GRM budget will be built into the DecSeC ESS, IEC and M&E budgets ¹² This means that the DECSEC will be responsible for the Governance of the system thereby providing general oversight of the grievance mechanism as a whole.

Monitoring and Evaluation

The GRM Officer, NGRC will have overall responsibility for tracking grievances and assessing the extent to which progress is being made to resolve them. The GRM Officer will provide regular updates on trends and where necessary suggest changes to minimize similar grievances in the future.

To assist the M&E effort of the GRM, the following indicators will be proposed to monitor and evaluate performance of the system:

- Number of complaints/ grievances registered
- Percentage of grievances resolved
- Percentage of grievances resolved within stipulated time period

¹²A realistic budget that will sufficiently cover the costs of the GRM's operation such as awareness campaigns, capacity building training, infrastructure and support services, field inspections, meetings, documentations, and supplies.

- Time required to resolve complaints (disaggregated by different types of grievances)
- Percentage of complainants satisfied with response and grievance redress process
- Spikes in grievances, geographical spread of grievances
Findings from the analysis will go into the decision making process of the project management team to strengthen the GRM and the overall performance of the project.

9.0 PUBLIC CONSULTATIONS AND DISCLOSURE FOR ESMF PREPARATION

9.1 Stakeholder Consultations

The ESMF preparation included stakeholder consultations. Key project stakeholders were identified for consultations and these included ministries, departments and agencies (MDAs), project offices, non-governmental organizations, and local communities (Tables 9, 10, and 11). Meetings were held with key officials and opinion leaders to examine the level of awareness and involvement with the project and concerns of project implementation as well as to obtain relevant documents or baseline information of project area and the environmental and social setting of Sierra Leone. The consultations also served to gather information on the mandates and permitting requirements to inform the development of the project.

9.2 ESMF Disclosure

The World Bank policies require that environmental reports for projects be made available to project-affected groups, local NGOs, and the public at-large. Public disclosure of ESIA documents or environmental reports is also a requirement of the Sierra Leone ESIA procedures. However, there is no limitation as to the extent and scope of disclosure. The DecSec /IPAU in collaboration with SLEPA have made available copies of the ESMF in selected public places as required by law for information and comments. Public notice in the media should serve this purpose.

The notification was done through a newspaper and radio announcement. The notification provided: (i) a brief description of the project; (ii) a list of venues where the ESMF report is on display and available for viewing; (iii) duration of the display period; and (iv) contact information for comments.

The SLEPA selected display venues upon consultation with MoFED and some of the venues or places were near the proposed project sites or local communities. Consultations on safeguards issues will be a continuous part of implementation activities and arrangements. This started with the preparation of the ESMF. The consultations were held at two levels. The national level involved key ministries including MOFED, MLGRD, SLEPA, and National Youth Commission. There were also Local council level consultations. The consultations and discussions of the draft ESMF impacted the final document as some stakeholders raised issues with dust, land, and destruction of farms, among others; these issues have been addressed in the mitigation plan. The meeting also emphasized the need for government ownership and commitment beyond the consultations to ensure (where required) the release of necessary funds to pay compensation and give the needed support to implementing agencies, especially contractors.

**Table 7: Safeguards Implementation Support Mission, Freetown City Council,
Date: Monday 6th June 2016**

| No | Name | Designation | Telephone No | Email |
|----|--------------------------|-----------------------------|------------------------|-----------------------------|
| 1 | Sallieu Turay | Chief Librarian | 07668545 | srelib2002@yahoo.com |
| 2 | Foday B. Seisoy | Senior Librarian | 076767452 | fodayseisoy@yahoo.com |
| 3 | Brima B. Kamara | Dep. Chief Librarian | 076471679 | burehkamara@yahoo.com |
| 4 | Daniel L. Dimoh | Internal Auditor | 076141319 | dimahdaniel@yahoo.com |
| 5 | Mrs Theresa Wusha-Conteh | Adm. Assist & Head of Prog. | 076355145 076311939 | mehajohn@yahoo.com |
| 6 | Dr. Emmanuel A. Doen | M/S | 079253912 | pmandud@yahoo.com |
| 7 | Rev. Com. Dr. TT Sumba | DMO | 076662162 | |
| 8 | Sahr Gbandeh | Principal CHO | 076795938 | sagbandeh@gmail.com |
| 9 | Agnes Williams | PHS | 076733961 | Agneswilliams2009@yahoo.com |
| 10 | Sylvester L. Thomas | RTF | 076735940 | cil_thomas@yahoo.com |
| 11 | Dr. Mohamed Bawoh | SPD | 076425381 | mohamedbawoh@yahoo.com |
| 12 | Aminata Nunie | DHS | 078469361 | aminunie@yahoo.com |
| 13 | Linda D. Samuel | M&E | 078736509 | lindasamuel4@yahoo.com |
| 14 | Joe L. Belmoh | Hosp. Sect. | 078506725 | joebelmoh10@gmail.com |
| 15 | Abu Jabbie | Head Security | 077434524 | |
| 16 | Kadi N. Bangura | Head Teacher | 076248207 | |
| 17 | James A. Abdula | Head Teacher | 076352401 | |

Table 10: Safeguards Implementation Support Mission, Port Loko, Friday 3rd June 2016.45am

MANAGEMENT MEETING ATTENDANCE

| No | Name | Designation | Telephone No | Email |
|----|------------------|-----------------|--------------|------------------------|
| 1 | Sang F. B Gibson | Mayor | | |
| 2 | Hannah M. Jaeh | Deputy Mayor | 078685021 | Jaehhannah28@gmail.com |
| 3 | Henry B. L Fyfe | Educator Office | 076144889 | bengifyfe3@gmail.com |

| | | | | |
|----|-------------------|-----------------------------|------------------------|----------------------------|
| 4 | Abdul Karim Marak | Dev't Planning Officer | 077968245 | |
| 5 | Stella M. Smith | Social Service | 076843896 | stellamonsmithee@yahoo.com |
| 6 | John T. Lassayo | Head Metro Police | 078610843 | johnlassayo@gmail.com |
| 7 | S. Zainu Parker | ESO | 076604976 | parkersulaima@yahoo.com |
| 8 | Atim N. Williams | Head of Marketing | 030609291 | atimwilliams@gmail.com |
| 9 | Duba Navo | Head of License | 076642218` | dubasesey62@gmail.com |
| 10 | Matilda Kroma | Dist. Recovery Team Officer | 076543843 | matilda.krama@gmail.com |
| 11 | Muhamed A. Koroma | Deputy Chief Adm. | 076390219 | julagboi@gmail.com |
| 12 | Fatmata Kanneh | Snr. Secretary (Foreign) | 076661749 077742759 | modiesil18121@gmail.com |

Table 11: Project: Bombali, Friday 3rd June 2016 2.15pm

| No | Name | Designation | Contact | Email |
|-----|------------------------------|----------------------------|------------------------|--|
| 1. | Abdul Koroma | C.A | 076636215 | koroma.abdul3@gmail.com |
| 2. | Abioseh P.S. Mausaray | RTF | 076718233 | abiosehzolo@gmail.com |
| 3. | Koroma Ishmael J | Volunteer | 076887862 | |
| 4. | Murray Kamara | Accountant | 076412972 | murray.kamara@yahoo.com |
| 5. | Frank Kanu | DPO | 076277570 | |
| 6. | Raymond G. Bamm- Caulker | PO | 076955705 | raymondgeorgebammc aulker@yahoo.com |
| 7. | Jonathan A. Combe | M&E | 077838599 078301966 | Combes2015@yahoo.com |
| 8. | Ibrahim A. Kanu | ESO | 088591799 078914260 | ibrahimahmedkanu@yahoo.com |
| 9. | Abdul B. Kanu | Engineer | 078545555 | abdulbkanu@yahoo.com |
| 10. | John Shanghai Koroma | Chairman | 076307229 | shangsamora@gmail.com |
| 11. | Fredrick Kousu Koudu | Finance Officer | 076209767 | kousiukou@yahoo.co.uk |
| 12. | Abass A. Fullah | Internal Auditor | 076828233 | Afullah2015@gmail.com |
| 13. | John Dito Kamara | Deputy Chairman | 078979740 | johnditokay@gmail.com |
| 14. | PC Mansa Paki Kabombor II | Paramount Chief, Mapaki | 076617639 | |

Table 12: Koinadugu District Council, Date: Saturday 4th June 2016 12.15

| No | Name | Designation | Telephone No | Email |
|-----|------------------|---------------------|--------------|---------------------------|
| 1. | Ishmael S. Arunu | Works Engineer | 078446288 | arunusylishmael@gmail.com |
| 2. | Sahr E. Yamboso | Chief Administrator | 076414363 | Sahryamboso757@gmail.com |
| 3. | Julia Dumbuya | RTF | 079765563 | Julia.dumbuya@yahoo.com |
| 4. | Komba P. Yomba | DPO | 076724147 | Kombayomba12@gmail.com |
| 5. | Abdul Sesay | M&E | 076278535 | Abdulaisesay64@gmail.com |
| 6. | Morlai P. Kamoru | LCFO | 076164034 | patmorlaikoy@gmail.com |
| 7. | Someru I. Koroma | Accountant | 076966973 | Simkay63@yahoo.com |
| 8. | Dr Francis Moses | DMO | 076324354 | frangoline@gmail.com |
| 9. | Alpha A. Sesay | Ag. Principal | 078650583 | |
| 10. | Abdulai Jalleh | | 076511583 | |
| 11. | Nuhu Jalleh | Teacher | 078804688 | |

The below tables present a cross-section of the responses provided by Local Councils involved in the field consultations.

Table 8:Bo District Council (08/06/2011)

| <i>Item</i> | <i>Consultation Issues</i> | <i>Responses</i> |
|-------------|---|--|
| 1 | How is the MTDP formulated? | Process begins at the grassroots, involving all relevant stakeholders including NGOs. The process is an open participatory process where all views and concern are collated through a series of community meetings and public flora. |
| 2 | How does the MMA select projects/communities for inclusion into the MTDP? Are beneficiaries consulted? | Projects are selected based on their priority within the community. The consultations involved are extensive and all beneficiaries are consulted. |
| 3 | What MTDP is currently being implemented and what environmental and social problems are often associated with the execution of the MTDP projects? | Upcoming projects are construction of Markets, street lighting. Development of car parks projects, etc. Funding sources for these projects is the Local Government. Development Grant Program etc. These activities often results in dust, construction waste, noise nuisance and interruption of access ways. |
| 4 | EA compliance in implementing the MTDP projects | |
| | Do the LCs comply with the EA requirements in implementing the MTDP projects? | Most major development projects of the LCs are subjected to the relevant EA requirements. However, ESIA's are not done in certain other infrastructure projects. |
| 5 | Are environmental permits obtained for the projects prior to execution? Why not? Do the LCs pay permit fees? | Yes, Environmental permits are obtained prior to the execution of some projects. Yes permit fees are paid. For some externally funded projects (e.g., LGDGP), environmental permitting fees are always incorporated into the project cost. |
| 6 | How is the lack of capacity a | The Bo District Council lacks in-house |

| | | |
|---|---|--|
| | factor in EA non-compliance (no environmental and social safeguards for projects)? | capacity for EA and management. It therefore depends on private consultancy services. The lack of the EA capacity affects the monitoring and compliance enforcement of environmental and social safeguards for projects. |
| 7 | Are planning approvals obtained prior to the execution of the MTDP projects? Why? Are fees paid? By and to whom? | Yes. |
| 8 | What are the likely environmental and social impacts that could result from the DSDPII? | The LGDGP will generate employment opportunities and improve district infrastructure. Major environmental and social impacts are not anticipated from the DSDPII. Any such impacts may relate to normal construction. |

Table 9: Makeni City Council (09/06/2011)

| <i>Item</i> | <i>Consultation Issues</i> | <i>Responses</i> |
|-------------|---|---|
| 1 | How is the MTDP formulated? | Projects are identified through the communities and validation done by the LC. |
| 2 | How does the MMA select projects/communities for inclusion into the MTDP? Are beneficiaries consulted? | Projects are selected based on their priority within the community. The consultations involved are extensive and all beneficiaries are consulted. |
| 3 | What MTDP is currently being implemented and what environmental and social problems are often associated with the execution of the MTDP projects? | Some projects being undertaken are schools, toilets, health infrastructure, foot bridges, pipe-borne water, drains, etc. Restriction of access to natural resources, which serve as a means of livelihood. Destruction of wildlife habitats in the mangrove swamps |
| 4 | EA compliance in implementing the MTDP projects | |
| | Do LCs comply with the EA requirements in implementing the MTDP projects? | Most major development projects of the LCs are subjected to the relevant EA requirements. However, ESIA's are not done some other infrastructure projects. |

| | | |
|---|--|---|
| 5 | <p>Are environmental permits obtained for the projects prior to execution? Why not?</p> <p>Do the MAs pay permit fees?</p> | <p>Yes, environmental permits are obtained prior to the execution of some projects.</p> <p>Yes, permit fees are paid. For some externally funded projects, environmental permitting fees are always incorporated into the project cost.</p> |
| 6 | <p>How is the lack of capacity a factor in EA non-compliance (no environmental and social safeguards for projects)?</p> | <p>The Makeni City Council lacks in-house capacity for environmental assessment and management. It therefore depends on private consultancy services. The lack of EA capacity affects the monitoring and compliance enforcement of environmental and social safeguards for projects.</p> |
| 7 | <p>Are planning approvals obtained prior to the execution of the MTDP projects? Why? Are fees paid? By & to whom?</p> | <p>Yes.</p> |
| 8 | <p>What are the likely environmental and social impacts that could result from the DSDPII?</p> | <p>The LGDGP will generate employment opportunities and improve infrastructure of the city. Major environmental and social impacts are not anticipated from the LGDGP.</p> <p>The potential environmental and social impacts may relate to normal construction impacts, which could be addressed through effective EA compliance and monitoring. Land acquisition impacts and encroachment are potential social concerns.</p> |

Table 105: Kenema District Council (10/06/2011)

| <i>Item</i> | <i>Consultation Issues</i> | <i>Responses</i> |
|-------------|---|--|
| 1 | How is the MTDP formulated? | Projects are identified through the communities, community members and validation done by the LC. |
| 2 | How does the MMA select projects/communities for inclusion into the MTDP? Are beneficiaries consulted? | Projects are selected based on their priority within the community. The consultations involved are extensive and all beneficiaries are consulted. |
| 3 | What MTDP is currently being implemented and what environmental and social problems are often associated with the execution of the MTDP projects? | Some project being undertaken are schools, toilets, health infrastructure, foot bridges, pipe-borne water, drains, etc. Restriction of access to natural resources, which serve as a means of livelihood. Destruction of habitats of wildlife in the mangrove swamps. |
| 4 | EA Compliance in Implementing the MTDP Projects. | |
| | Do the Local Councils comply with the EA requirements in implementing the MTDP projects? | Most major development projects of the LC are subjected to the relevant EA requirements. However, ESIA's are not done some other infrastructure projects. |
| 5 | How do you incorporate ES safeguards into your MTDPs implementation and who conducts monitoring? | There are two types of projects: (i) GoSL-funded and (ii) donor-funded. Donor-funded projects (LGBGP) are subject to E&S but GoSL-funded ones are usually not subjected to EA except in cases where the E&S issues are 'severe'. |
| 6 | How is the lack of capacity a factor in EA non-compliance (no environmental and social safeguards for projects)? | The Kenema District Council lacks in-house capacity for environmental assessment and management. It therefore depends on private consultancy services. The lack of the |

| | | |
|---|--|---|
| | | EA capacity affects the monitoring and compliance enforcement of environmental and social safeguards for projects. |
| 7 | Are planning approvals obtained prior to the execution of the MTDP projects? Why? Are fees paid? By & to whom? | Yes. |
| 8 | What are the likely environmental and social impacts that could result from the DSDP II | <p>The LGDGP will generate employment opportunities and improve city infrastructure. E&S impacts are not anticipated from the LGDGP.</p> <p>The potential environmental and social impacts may relate to normal construction impacts, which could be addressed through effective EA compliance and monitoring. Land acquisition impacts and encroachment are potential social concerns.</p> |

Consultations with of Sierra Leone Environmental Protection Agency

Consultations were held with the Executive Chairperson and Director of Sierra Leone Environmental Protection Agency (SLEPA), being the GoSL's lead environmental regulator. The issues discussed are shown in Table6 below.

Table 11: Sierra Leone Environmental Protection Agency (01/06/2011)

| <i>Item</i> | <i>Consultation Issues</i> | <i>Responses</i> |
|-------------|--|---------------------------------------|
| 1 | Do you conduct E&S compliance monitoring of LCs MTDP project implementation? | No, except for donor-funded projects. |
| 2 | Has the EPA ever carried out a Public Hearing or Grievance Redress for any of the LC's projects? | Yes. |
| 3 | If no, are you in a position to conduct them? (Any capacity gaps?) | N.A. |

PICTURES OF THE CONSULTATION PROCESS



DecSec & Key Staff



Safeguards Training Workshop



Consultation Session with Mayor Community Consultation in Moyamba District of Bo District and Technical Staff



Community Consultation Meetings in Bo District and Kenema District

REFERENCES

1. Constitution of Sierra Leone
2. Environmental Protection Agency Act, 2008
3. Environmental Protection Agency (Amendment) Act, 2010
4. Local Government Act, 2004
5. National Environmental Action plan, 2000
6. National Land Policy, 2005
7. PROJECT PAPER. Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context
8. Uprety, BK (2003), Environmental Impact Assessment Process and Practice, Uttara, Uprety, Koteswor, Kathmandu
9. William L K and R. L. Langley, Environmental Health Secrets, Hanaley & Belfus Inc, Philadelphia

APPENDICE

Annex 1: Civil Works Subproject Impacts and corresponding Mitigations

Annex 2: Project In-House Subproject Screening Checklist

Annex 3: Standard Format for In-House Screening Report

Annex 4: SLEPA Checklist for Issuance of Environmental Impact Assessment License for Projects

Annex 5: Environmental and Social Safeguards Clauses for Contractors

Annex 6: TOR for Environment and Social Safeguards Specialists

APPENDICE

Annex 1: Civil Works Subproject Impacts and Corresponding Mitigations

| <i>Subprojects</i> | <i>Potential Impacts</i> | <i>Sources</i> | <i>Safeguards/Mitigations</i> |
|--|--------------------------|--|--|
| Health and Education Infrastructure | Dust / emissions | Removal of top soil / clearing and site preparation Dumping of spoil materials Compaction with machinery Burrow pits and gravel winning Operating quarries Haulage of materials | Water dousing to minimize dust Cover all heaped sand and flyable construction materials Tarpaulin covering of haulage truck (for dust control) Minimize area of ground clearance Haulage speed limit in sensitive areas (40km/hr) Regular Servicing of equipment/machinery Work-site dust management (nose mask) |
| | Noise and vibration | Compaction with machinery Burrow pits and gravel winning Operating quarries Haulage of materials Use of implements | Noise-sensitive areas (include schools, hospitals/clinics, communities, wildlife sanctuary, reserves, etc) Maintain equipment noise standards (less than 65dBs) Hours of operation (between 8.30 and 5.00pm) Haulage speed limit in sensitive areas (40km/hr) Work-site noise management (less than 65dBs, ear plugs) |
| | Pits/trenches near road | Landscape disturbance Gravel removal Trenching | Restore topsoil and re-vegetate landscape after construction Cover all pits and trenches Reclaim borrow pits |
| | Construction | Over extended site preparation and | Minimizing the area of ground clearance Waste minimization measures |

| | | | |
|--|-----------------------------------|--|--|
| | waste generation and disposal | unnecessary waste generation Poor handling of cleared vegetation and top soil Inappropriate disposal of spoil and other construction wastes | Work-site waste management (Plastics, scraps, waste wood, etc.) Provision of waste bins for use by workers Disposal of waste at approved locations |
| | Public safety/health Accidents | Exposure to atmospheric emissions from construction equipment Exposure to excessive and continuous noise and vibration from construction activities Lack of warning sign and safeguards Excessive manual work | Regular servicing of construction equipment Use of equipment with low operating noise levels (less than 65dBs) Provision and use of appropriate PPEs Restricting construction works to day time hours Intensive public awareness campaigns Open ditches and other hazard areas to be marked with visible tapes |
| | Water contamination and flooding | Construction-related activities – land clearing, gravel removal, drain construction, etc. Inappropriate disposal of waste Blocking of drains and drainage/stream diversion | Water crossings to be minimized and buffer zones of undisturbed vegetation to be left between construction sites and watercourses. Redesign of road/construction to accommodate flood prevention methods. Disposal of construction related waste materials at designated site. Provision of planned diversion routes during construction. Flood control management |

| | | | |
|--|---|--|---|
| Water Infrastructure (Dams and Dugouts) | Siltation & modification of flow of water courses | <p>Site preparation and clearing</p> <p>Excavation and transportation of raw materials</p> <p>Dam excavation</p> <p>Run-off from exposed surfaces</p> <p>Stream diversion works</p> <p>Dumping of spoilt materials</p> | <p>DecSec/LGFD to restrict project funding to only rehabilitation of small dams that are below 10m high and on small tributary</p> <p>DecSec/ LGFD to ensure compliance with safeguards procedures outlined in dam safety plan</p> <p>Avoiding alignments which are susceptible to erosion, such as those crossing steep slopes</p> <p>Sourcing raw materials away from water sources</p> <p>Minimize area of ground clearance</p> <p>Waste materials to be dumped at SLEPA and DAs approved dump sites</p> |
| | Water quality degradation (surface and groundwater) | <p>Exposed soil surfaces</p> <p>Sediment laden run-offs</p> <p>Concentrating flows at certain points and, in some cases, increasing the speed of flow resulting in flooding, soil erosion, channel modification, and siltation of streams.</p> | <p>Minimize area of ground clearance</p> <p>Introduce Water speed reduction measures e.g. grasses, riprap, and other devices in water channels and stream diversions etc.</p> <p>Provide settling basins to remove silt, pollutants, and debris from run-off water before discharge to adjoining streams or rivers</p> <p>Construction of runoff channels, contouring or other means of erosion control</p> <p>Re-vegetate the banks of dams with appropriate species.</p> |

| | | | |
|--|---|--|--|
| | <p>Ground water table modifications</p> | <p>Stream drainage excavation & embankments (restricting flow)</p> <p>Sedimentation, changes in biological activity in streams and on their banks</p> <p>Uncontrolled construction activities,</p> <p>Chemicals (agro-chemicals spillage).</p> | <p>Introduce Water speed reduction measures e.g. grasses, riprap, and other devices in water channels and stream diversions etc.</p> <p>Provide settling basins to remove silt, pollutants, and debris from road runoff water before discharge to adjoining streams or rivers</p> <p>Construction of run-off channels, contouring or other means of erosion control</p> <p>Pave sections of roads prone to erosion and sedimentation particularly relevant near water crossings.</p> <p>Compensatory measures such as provision of bore holes and wells for communities adversely affected</p> <p>Adopt environmental enhancements measures in design such as water retention structures in dry areas, and raising inlets to drainage culverts in high water table areas, retarding basins in areas prone to flooding to reduce runoff peaks, spillways.</p> |
|--|---|--|--|

Annex 2: Strengthening Community Mobilization and Local Council Service Delivery in the Post-Ebola Context

In-House Subproject Screening Checklist

(To be completed by Environmental and Social Officer, Local Council)

Project No:

Subproject Name: _____

Environmental and Social Officer Name:

District: _____
Ward: _____ **Village:** _____

Address for correspondence

Contact Person _____ **Position**

Phone No. _____ **Fax No.**

E-mail Contact _____

1.0 Description of Proposed Subproject

1.1 Nature of Subproject and Estimated Duration

.....
.....
.....
.....
.....
.....
.....
.....
.....

1.2 Scope of Subproject [Size of labor force, area covered or length & width of road, type of raw materials (quantities and sources), types of equipment, implements, machinery, etc.]

.....

1.3 Waste Generation

i. Types: Solid Liquid Gaseous Other

.....
 ii. Quantity:

iii. Means/Place of Disposal:

 ...

2.0 Proposed Site for Subproject

2.1 Location [attach a site plan or a map (if available)]

i. Location or Area (and nearest Town(s)):

 ii. Amount of land required (total area for subproject and related activities):

2.2 Current land Use of the Area for the proposed Subproject:

| | | | | | |
|-------------|--------------------------|-------------|--------------------------|-----------------|--------------------------|
| Agriculture | <input type="checkbox"/> | Residential | <input type="checkbox"/> | Existing | <input type="checkbox"/> |
| | | | | Dugout | |
| Existing | <input type="checkbox"/> | Reservation | <input type="checkbox"/> | Park/Recreation | <input type="checkbox"/> |
| Road | | | | on | |
| Industrial | <input type="checkbox"/> | Other | <input type="checkbox"/> | | |
| | | (specify) | | | |

2.3 Current land ownership of the area for the proposed Subproject:

State Owned

Privately
owned

Customary
Land

2.4 *Agreement on use of land (state acquisition, willing buyer/willing seller, land donation)*

.....
.....
.....

...

2.5 *Site Description [Sketch showing distances and attach photographs if available]*

i. Distance from nearest water body or drainage channel (minimum distance measured from the edge of proposed site to the bank of the water body or drain).

More than 100 meters 100 meters Less than 100 meters

ii. Number of water bodies and/or drainage channels/depressions crossed by the route/road corridor/subproject site:

.....
.....

iii. Distance to nearest community (house) and/or other existing structures from the proposed site:

.....
.....

iv. Number of communities (structures) along the entire stretch of the Subproject site:

.....
.....

v. Number of households (individuals) using the project site for agricultural use, harvesting of medicinal plants, etc.

.....
.....

vi. Will project increase pressure on land resources? If so, explain below:

.....
.....
.....
.....
.....

vii. Will project result in involuntary land take? If so, explain below:

.....
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.....
.....
viii. Will people assets or livelihoods be affected? If so explain below including numbers of people/assets to be affected:

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.....
.....
.....
.....
.....
.....
.....

viii. Will people lose access to natural resources? If so, explain below:

.....
.....
.....
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.....
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.....
.....

Please note that if the project results in involuntary land take, destruction of assets, and/or negative impacts on livelihoods the Resettlement Policy Framework (RPF) should be applied in the implementation of the project. A Resettlement Action Plan (or Abbreviated Resettlement Action Plan) will be required.

2.6 Land Cover and Topography

- i. Land cover of the site consists (completely or partly or noticeably) of:
- | | | | | | |
|-------------|--------------------------|-----------------------|--------------------------|-----------------------|--------------------------|
| Vegetation | <input type="checkbox"/> | Sparse Vegetation | <input type="checkbox"/> | Physical Structure(s) | <input type="checkbox"/> |
| Flood Plane | <input type="checkbox"/> | Agriculture (Animals) | <input type="checkbox"/> | Cultural Resource | <input type="checkbox"/> |
| Water | <input type="checkbox"/> | Agriculture (Crops) | <input type="checkbox"/> | Other specify..... | |

- ii. Elevation and topography of the area for the Subproject:
- | | | | | | | | |
|------|--------------------------|----------|--------------------------|------------|--------------------------|------------|--------------------------|
| Flat | <input type="checkbox"/> | Valley | <input type="checkbox"/> | Slope | <input type="checkbox"/> | Undulating | <input type="checkbox"/> |
| Hill | <input type="checkbox"/> | Mountain | <input type="checkbox"/> | Depression | <input type="checkbox"/> | | |

- iii. Elevation and topography of the adjoining areas (within 500 meters radius of the site):

- | | | | | | | | |
|------|--------------------------|----------|--------------------------|------------|--------------------------|------------|--------------------------|
| Flat | <input type="checkbox"/> | Valley | <input type="checkbox"/> | Slope | <input type="checkbox"/> | Undulating | <input type="checkbox"/> |
| Hill | <input type="checkbox"/> | Mountain | <input type="checkbox"/> | Depression | <input type="checkbox"/> | | |

3.0 Infrastructure

- i. The Subproject would be developed in/on:
- | | | | | | |
|------------------|--------------------------|-----------------------|--------------------------|----------------|--------------------------|
| Undeveloped site | <input type="checkbox"/> | Partly developed site | <input type="checkbox"/> | Existing route | <input type="checkbox"/> |
| Other (specify) | | | | | |

- ii. The Subproject would involve excavation Yes No

- iii. Estimated number and depth of the excavations, etc:

.....

- vi. Are any of the following located on-site or within 50 meters from the edge of the proposed site?

Water supply source Yes No

Pipeline Yes No

Power supply source (electric pylon) Yes No

Drainage Yes No

Other(s) specify:
.....

4.0 Environmental and Social Impacts

4.1 Air Quality - Would the proposed Subproject:

- i. Emit during construction
- | | | | | | |
|------|--------------------------|-------|--------------------------|------|--------------------------|
| Dust | <input type="checkbox"/> | Smoke | <input type="checkbox"/> | VOCs | <input type="checkbox"/> |
|------|--------------------------|-------|--------------------------|------|--------------------------|
- ii. Expose workers or the public to substantial emissions? Yes No
- iii. Result in cumulatively increased emissions in the area? Yes No
- vi. Create objectionable odor affecting people? Yes No

4.2 Biological Resources - Would the proposed Subproject:

- i. Have adverse effect on any reserved area? Yes No
- ii. Have adverse effect on wetland areas through removal, filling, hydrological interruption or other means? Yes No
- iii. Interfere substantially with the movement of any wildlife Yes No

species or organisms?

vi. Be located within 100m from an Environmentally Sensitive Area? Yes No

4.3 Existing Population:

i. Will people living in or near the project area be adversely affected
.....
.....
.....

ii. *Will there be negative impacts on vulnerable community members (such as women, amputees, orphans, widows/widowers, the elderly, returnees and the internally displaced, etc.)?*
.....
.....
.....

iii. *Will there be positive impacts on vulnerable community members (e.g., women, amputees, orphans, widows/widowers, the elderly, returnees and the internally displaced, etc.)?*
.....
.....
.....

iv. *Will vulnerable community members benefit from and have access to subproject benefits?*
.....
.....
.....

4.4 Cultural Resources - Would the proposed Subproject:

- i. Disturb any burial grounds or cemeteries? Yes No
- ii. Cause substantial adverse effect on any archaeological or historic site? Yes No
- iii. Alter the existing visual character of the area and surroundings, including trees and rock outcrops? Yes No

Please note, if the response on any of the above questions is YES the chance find procedures should be followed. (See ESMF).

4.5 Water Quality and Hydrology - Would the proposed Subproject:

i. Generate and discharge during construction:

- | | | | |
|-----------------------------------|--------------------------|--------------------------------|--------------------------|
| Liquid waste | <input type="checkbox"/> | Liquid with oily substance | <input type="checkbox"/> |
| Liquid with human or animal waste | <input type="checkbox"/> | Liquid with chemical substance | <input type="checkbox"/> |
| Liquid with pH outside 6-9 range | <input type="checkbox"/> | Liquid with odor/smell | <input type="checkbox"/> |

- ii. Lead to changes in the drainage pattern of the area, resulting in erosion or siltation? Yes No
- iii. Lead to increase in surface run-off, which could result in flooding on or off-site? Yes No
- iv. Increase runoff, which could exceed the capacity of existing storm water drainage? Yes No

4.6 Noise Nuisance - Would the proposed Undertaking:

- i. Generate noise in excess of established permissible noise level? Yes No
- ii. Expose persons to excessive vibration and noise? Yes No

4.7 Other Environmental and Social Impacts

.....

5.0 Management of (Environmental and Social) Impacts

5.1 Air Quality

.....

5.2 Biological Resources

.....

5.3 Cultural Resources

.....

5.4 Water Quality and Hydrology

.....
.....
.....
.....

5.5 Noise

.....
.....
.....
.....

5.6 Any Other

.....
.....
.....
.....
.....

6.0 Review and Clearances

Implementing Local Council

.....
.....

Name of Representative

.....
.....

Signature, Date

.....
.....

Name of Environmental and Social Officer

.....
.....

Signature, Date

.....
.....

Name of Environmental and Social Specialist

.....
.....

Signature/Date

Annex 3: Standard Format for In-House Screening Report

1. GENERAL DESCRIPTION

- 1.1. Overview of the study area
- 1.2. List of Selected Health Facilities

2. PROJECT-SPECIFIC SCREENING (FOR EACH SUBPROJECT):

- 2.1. Existing infrastructure
- 2.2. Proposed Works
- 2.3. Estimated Cost
- 2.4. Summary of Environmental and Social Issues
 - 2.4.1. Land Resources
 - 2.4.2. Hydrology and Water Resources
 - 2.4.3. Air and Noise
 - 2.4.4. Biological Resources
 - 2.4.5. Socio-Economic and Cultural
 - 2.4.5.1. Population
 - 2.4.5.2. Employment and Other Benefits
 - 2.4.5.3. Other site-specific issues
- 2.5. Environmental Screening Category
- 2.6. Applicable Safeguards Policies

3. ATTACHMENTS

- 3.1. Maps
- 3.2. Photos
- 3.3. Location and Administrative Maps
- 3.4. Environmental and Social Checklist

Annex 4: Checklist for the Issuance of Environmental Impact Assessment License



OFFICE OF THE PRESIDENT

**CHECKLIST FOR THE ISSUANCE OF ENVIRONMENTAL IMPACT ASSESSMENT (EIA)
LICENCE FOR PROJECTS UNDER THE FIRST SCHEDULE OF THE ENVIRONMENT
PROTECTION AGENCY ACT, 2010**

The developer/proponent is required to undertake the following stages.

Stage One – Registration

1. Proponent/Developer is required to register the project proposal through an application process. The letter is addressed to the Executive Chairperson and copied to the Director for the attention of the EIA Focal Point. This is to expedite the processing of the EIA application.
2. Application and screening forms are issued to the proponent/developer after a payment of two hundred thousand Leones at an account designated for EIA's application fees.
3. The proponent is required to return duly completed forms to the Environment Protection Agency Sierra Leone (EPA-SL).

Stage Two – Screening

1. Project proposal and screening forms are screened to determine whether or not the development proposal should be subject to an EIA and, if so, the level of detail required.
2. This stage of the EIA process is done within two weeks.

Stage Three – Scoping

1. After the project has been classified and a determination is made that the activity requires an environmental impact assessment license the proponent will be required to submit a scoping report on the project.
2. The Agency and proponent will agree on the (Terms of Reference) ToRs before the commencement of the impact studies.
3. Upon receipt of the scoping report, the process for the determination of the ToRs shall be within two weeks.
4. Staff of the Agency will visit the location of the project before approval of the ToRs.

Stage Four – Environmental, Social and Health Impact Studies and Preparation of the Report

1. Upon approval of the ToRs the proponent undertakes the impact studies.
2. The ESHIA report must document clearly and impartially impacts of the proposal, the proposed measures for mitigation, the significance of effects on the environment, and the concerns of the interested public and the communities affected by the proposal. In this regard, management plans including the environmental management plan (EMP), community development and action plan (CDAP), resettlement action plans etc. must be clearly articulated in the document.
3. Upon completion of the impact studies, the proponent should submit eighteen hard and soft copies of the ESHIA report to the Agency for circulation to Board members and professional bodies.

Stage Five – Review of the ESHIA Report

1. The Agency will determine whether the ESHIA report meets the terms of reference provides a satisfactory assessment of the proposal(s) and contains the information required for decision making.
2. The report will be gazetted and circulated to professional organizations for comments by the Agency. The proponent will have to disclose the ESHIA report through publication of dates for disclosure on newspapers, and hold two or more public hearing meetings for public participation in the decision-making process. The placement of the ESHIA report in specific places will enable the affected or interested persons to make comments on the impact studies and submit to the Agency for decision making. Staff of the Agency will also visit the site or operational areas of the project to ascertain the components and content of the ESHIA Report in the review stage.
3. Depending on the location of the project the proponent will be required to make announcements over the media in the local languages

Stage Six – Decision Making

1. This is the stage where the ESHIA report is approved or rejected.

Annex 5: Environmental and Social Safeguards Clauses for Contractors

1.0 General

a) The Contractor shall comply with the safeguards for the subproject he/she is handling, as contained in the ESMF, and those mitigation measure he/she may propose in the assessment form. The Contractor shall acquaint himself with such safeguards and mitigation measures, and prepare his/her work strategy and plan to fully take them into account.

b) The Contractor shall prepare method statements indicating the period within which he /she shall maintain status on site after completion of works to ensure that significant adverse impacts arising from such works have been appropriately addressed.

c) The Contractor shall adhere to the activity implementation schedule and the monitoring plan/strategy to ensure effective feedback of monitoring information to the ESO, District Engineer (DE) and the Resident Technical Facilitator of the Decentralization Secretariat (RTF/DecSec) so that impact management can be implemented properly, and if necessary, adapt to changing and unforeseen conditions.

d) Besides the regular inspection of the sites by the Safeguards officers of DecSec and the ESO/DE/RTF for adherence to the contract conditions and specifications, the contractor may appoint a Site Engineer to oversee the compliance with these environmental conditions and any other mitigation measures. The Sierra Leone Environmental Protection Agency (SLEPA), personnel in the capacity of Environment and Social officer or the Environmental and social specialist. In all cases, as directed by the ESO/DE, the Contractor shall comply with directives from such inspectors to implement measures required to ensure the adequacy of rehabilitation measures carried out on the bio-physical environment and compensation for socio-economic disruption resulting from implementation of all works.

e) The Contractor shall implement all safeguards necessary to avoid undesirable adverse environmental and social impacts wherever possible, restore worksites to acceptable standards, and abide by mitigation measures in the Subproject Initial Assessment.

f) If the Contractor fails to implement the safeguards after written instruction by the ESO to fulfil his/her obligation within the requested time, the LC reserves the right to arrange through the LGFD for execution of the missing action by a third party on account of the Contractor.

2.0 Dust Abatement

a) The contractor shall minimize the effect of dust on the surrounding environment to ensure safety, health and the protection of workers and communities living in the vicinity of dust producing activities.

b) During implementation of the subproject activities, the contractor shall carry out proper and efficient measures, such as sprinkling with water or other means, whenever necessary to reduce the dust nuisance, and to prevent dust which has originated from his/her operations from damaging crops, cultivated fields, and dwellings or causing a nuisance to persons. The contractor will be held liable for any damage resulting from dust originating from his/her operations.

3.0 Noise Due to Construction Activities

The contractor shall ensure the noise levels emanating from machinery, equipment, implements, vehicles and noisy construction activities are kept at a minimum for the safety, health and protection of workers within the vicinity and nearby communities of high noise levels. The national noise limit standard for residential area in day time is 55dB, while at night is 45dB.

4.0 River, Stream, etc. Obstruction

a) The contractor shall ensure the existing water flow regimes in rivers, streams and other natural or drainage channels are maintained and/or re-established where they are disrupted due to works being carried out.

b) The contractor shall take all necessary steps to prevent contamination of streams, rivers and other natural water bodies/reservoirs.

c) Oils, lubricants and wastewater used or produced during the execution of works will not be released directly into rivers, streams, drainage channels and other natural water bodies/reservoirs without prior treatment and also ensure that stagnant water in uncovered burrow pits is treated in the best way to avoid creating possible breeding grounds for mosquitoes.

5.0 Site Restoration/Rehabilitation

a) The contractor shall prevent and minimize the impacts of quarrying, earth burrowing, piling and building of temporary construction camps and access roads on the biophysical environment, including protected areas and arable lands, local communities and their settlements. In as much as possible restore/rehabilitate all sites to acceptable standards.

b) At the end of the construction phase, all construction sites shall be landscaped and rehabilitated to acceptable standards. The stated areas shall be first landscaped, dressed with topsoil and covered with appropriate plant species or grass seeding.

6.0 Protection of Archaeological and Historical Sites

- a) Upon discovery of any relics or anything that might be or is believed to be of archaeological or historical importance during the execution of works, immediately suspend activity and report such findings to the ESO so that the National Museums and Monuments Department may be expeditiously contacted for fulfilment of the measures aimed at protecting such historical or archaeological resources.
- b) The contractor shall take the necessary measures to prevent any person or equipment that may damage the relics and shall provide barricades, fences, and signals and, if necessary, protect against atmospheric agents, as directed by the Inspector. Guard service may also be required by the Inspector.
- c) The ESO shall take the following measures:
 - Notify the National Museums and Monuments Department
 - Request that a representative make a site inspection;
 - Cessation of work in the vicinity of the find until the visit of the representative
 - Decision by the National Museums and Monuments Department on possible salvage or excavation within 48-72 hours of notification.

7.0 Vegetation and Wildlife

- a) Discourage construction workers from engaging in the exploitation of natural resources such as hunting with fire, fishing with chemicals, and setting fires or any other activity that might have a negative impact on the socio-economic welfare of the local communities.
- b) The contractor shall exercise caution, in planning, constructing, maintaining and operating temporary works such as camps, roads, spoil, stockpile and construction facilities areas, to avoid unnecessary damage to areas of particular environmental interest, such as patches of remaining forest, valuable trees and erosion of sensitive areas, as well as areas in which the presence of wildlife has been noted.
- c) In case some part of a forest or single trees have to be removed, or where erosion problems that may affect some portion of the permanent or temporary works are expected, and in any case where in ESO's opinion is considered beneficial for land conservation, the contractor may be required to carry out landscaping, seeding and planting of trees, as well as executing drainages and water control works, according to the prescriptions contained in the pertinent sections of these clauses.
- d) No valuable trees or crops shall be damaged or removed by the contractor during the execution of the works without the prior consent of the Inspector.
- e) Hunting in the proximity of camps and facilities and in general in the project area is strictly prohibited, even if allowed by local rules or regulation in force in the project region.

8.0 Use of Materials

The contractor, in as much as possible, shall use local materials to avoid importation of foreign material and long distance transportation.

9.0 Worksite Waste Management

a) All vessels (drums, containers, bags, etc.) containing oil/fuel/surfacing materials and other hazardous chemicals shall be bounded in order to contain spillage. Used oil and hydraulic fluid generated on the construction sites must be collected in a closed container and stored temporarily in a safe place and sent to an authorized dealer.

b) All drainage and effluent from storage areas, workshops and campsites shall be captured and treated before being discharged into the drainage system, in line with applicable water quality discharge limits.

c) The contractor shall take all possible steps to prevent pollution of streams, rivers, and other water supplies, at or in the vicinity of the site and shall comply with applicable laws, orders and regulations in force in Sierra Leone concerning the control and abatement of water pollution.

d) Entry of runoff to the site shall be restricted by constructing diversion channels or holding structures such as banks, drains, dams, etc. to reduce the potential of soil erosion and water pollution.

e) Construction waste shall not be left in stockpiles, but removed and reused or disposed of on a daily basis.

f) If disposal sites for clean spoil are necessary, they shall be located in areas, approved by the Inspector, for landfill and where they will not result in material being easily washed into drainage channels. Whenever possible, spoil materials should be placed in low lying areas and should be compacted and dressed with top soil and then planted with species indigenous to the locality.

g) The contractor shall provide all sanitary facilities (e.g. garbage collection and disposal, drinking water facilities, etc.) in construction work areas or camps.

10.0 Material Excavation and Deposit

a) The Contractor shall obtain appropriate licenses/permits from relevant authorities to operate quarries or burrow areas.

b) The location of quarries and burrow areas shall be subject to approval by relevant local and national authorities, including traditional authorities if the land is traditional land.

c) New extraction sites:

- Shall not be located in the vicinity of settlements, cultural and historical sites, wetlands or any other valued ecosystem component, or on high or steep ground or in areas of high scenic value.
- Shall not be located in archaeological areas. Excavations in the vicinity of such areas shall proceed with great care and shall be supervised by government authorities having a mandate for their protection.
- Shall not be located in forest reserves. However, where there are no other alternatives, permission shall be obtained from the appropriate authorities and an environmental impact study shall be conducted.
- Shall be rehabilitated. Areas with minimal vegetation cover such as flat and bare ground, or areas covered with grass only or covered with shrubs less than 1.5m in height, are preferred.
- Shall have clearly demarcated and marked boundaries to minimize vegetation clearing.

d) Vegetation clearing shall be restricted; clearing shall not be done more than two months in advance of operations.

e) Stockpile areas shall be located in areas where trees can act as buffers to prevent dust pollution. Perimeter drains shall be built around stockpile areas. Sediment and other pollutant traps shall be located at drainage exits.

f) The Contractor shall deposit any excess material in accordance with the principles of these general conditions, and in areas approved by local authorities and/or the Inspector.

g) Areas for depositing hazardous materials such as contaminated liquid and solid materials shall be approved by the ESO before the commencement of work. Use of existing, approved sites shall be preferred over the establishment of new sites.

11.0 Rehabilitation and Soil Erosion Prevention

- To the extent practicable, the contractor shall rehabilitate the site progressively so that the rate of rehabilitation is similar to the rate of construction.
- Always remove and retain topsoil for subsequent rehabilitation. Soils shall not be stripped when they are wet as this can lead to soil compaction and loss of structure.
- Topsoil shall not be stored in large heaps. Low mounds of no more than 1 to 2m high are recommended.

- Re-vegetate the stockpiles with recommended grass species to protect the soil from erosion, discourage weeds, and maintain an active population of beneficial soil microbes.
- Locate stockpiles where they will not be disturbed by future construction activities.
- The contractor shall reinstate natural drainage patterns where they have been altered or impaired.
- The contractor shall collect toxic materials from construction areas and keep them protected in designated sites until proper disposal. Backfill excavated areas with soils or overburden that is free of foreign material that could pollute soil and groundwater.
- Identify potentially toxic overburden and screen with suitable material to prevent mobilization of toxins.
- Ensure reshaped land is formed so as to be inherently stable, adequately drained and suitable for the desired long-term land use, and allow natural regeneration of vegetation.
- Minimize the long-term visual impact by creating landforms that are compatible with the adjacent landscape.
- Minimize erosion by wind and water both during and after the process of reinstatement.
- Compacted surfaces shall be deep ripped to relieve compaction unless subsurface conditions dictate otherwise.
- Re-vegetate with plant species that will control erosion, provide vegetative diversity and, through succession, contribute to a resilient ecosystem. The choice of plant species for rehabilitation shall be done in consultation with local research institutions, the Ministry of Agriculture, Forestry and Food Security and the local people.

12.0 Water Resources Management

The contractor shall, at all costs, avoid conflicting with water demands of local communities.

- Abstraction of both surface and underground water shall only be done with the consultation of the local community and after obtaining a permit from the Ministry of Works, Housing and Infrastructure.
- Abstraction of water from wetlands shall be avoided. Where necessary, permission has to be obtained from relevant authorities.
- No construction water containing spoils or site effluent, especially cement and oil, shall be allowed to flow into natural drainage courses.
- Wastewater from washing out of equipment shall not be discharged into water courses without pre-treatment.

- Site spoils and temporary stockpiles shall be located away from the drainage system, and surface run-off shall be directed away from stockpiles to prevent erosion.

13.0 Disposal of Unusable Elements

a) Unusable materials and construction elements such as electro-mechanical equipment, pipes, accessories and demolished structures will be disposed of in a manner approved by the District Engineer in close collaboration with SLEPA and DecSec. The contractor has to agree with the ESO/DE which elements are to be recycled or reused, and which will be disposed of at approved landfill sites.

b) Unsuitable and demolished elements shall be dismantled to a size fitting on ordinary trucks for transport.

14.0 Repair of Private Property

a) Should the contractor, deliberately or accidentally, damage private property; he shall repair the property to the owner's satisfaction and at his/her own cost. For each repair, the contractor shall obtain from the owner a certificate that the damage has been repaired satisfactorily in order to indemnify the contractor from subsequent claims.

b) In cases where compensation for inconveniences, damage of crops etc. are claimed by the owner, the DC has to be informed by the contractor through the DE. This compensation is in general settled under the RAP before signing the Contract. In unforeseeable cases, the LC will take care of compensation based on the RPF principles and the preparation of a Resettlement Action Plan.

15.0 Health and Safety

Adequate signs to warn strangers of construction activities, diversions, etc. shall be provided at appropriate points.

b) In advance of the construction work, the contractor shall mount an awareness and hygiene campaign. Workers and local residents shall be sensitized on health risks, particularly of HIV/AIDS and malaria.

16.0 Reporting

The contractor shall prepare progress reports to the ESO/DE on compliance with these general conditions and the subproject safeguards. It is expected that the contractor's reports will include information on:

- EHS management actions/measures taken, including approvals sought from local or national authorities;
- Problems encountered in relation to aspects of the safeguards (incidents, including delays, cost consequences, etc. as a result thereof);

- Lack of compliance with contract requirements on the part of the contractor;
- Changes of assumptions, conditions, measures, designs and actual works in relation to aspects of the safeguards; and
- Observations, concerns raised and/or decisions taken with regard to safeguards during site meetings.

It is advisable that reporting of significant EHS incidents be done "as soon as practicable". Such incident reporting shall therefore be done and submitted to the ESO/DE copied SLEPA and DecSec. Also, it is advisable that the contractor keeps his/her own records on health, safety and welfare of persons, and damage to property. It is advisable to include such records, as well as copies of incident reports, as appendices to the monthly progress reports. Details of safeguards performance will be reported to the ESO/DE.

17.0 Labor Sourcing

The contractor shall ensure that as much as possible the local community members are fully engaged, where additional workforce is required before extending to other project catchment communities.

18.0 Training of Contractor's Personnel

The contractor shall provide sufficient training to his/her personnel to ensure that they are all aware of the relevant aspects of these general conditions, the relevant safeguards as provided in the ESMF and comply accordingly. Specific training should be provided to those employees that have particular responsibilities associated with the implementation of the safeguards. General topics should be:

- EHS in general (working procedures);
- Emergency procedures; and
- Social and cultural aspects (awareness creation).

19.0 Cost of Compliance

It is expected that compliance with these conditions is already part of standard good workmanship and state-of-the-art as generally required under this Contract. The item "Compliance with Safeguards" in the Bill of Quantities covers these costs. No other payments will be made to the Contractor for compliance with any request to avoid and/or mitigate an avoidable EHS impact.

**Annex 6:
Strengthening Community Mobilization and Local Council Service Delivery in the
Post-Ebola Context: Land Donation Form**

This form is to be filled out when subprojects will be located on customary/private land. In these circumstances, the land is not being acquired by the state, ownership remains with the customary authorities/private individual; however, they have agreed to donate use of the land to the subproject.

(To be completed by Environmental and Social Officer, Local Council)

1. Project Information

Project No.:Subproject Name:

District: _____ Ward: _____ Village: _____

Description of Proposed Subproject:

.....
.....
.....

**Length of time for which land is
required:**.....

2. Land Owner Information

Name:.....

Address:.....

Mobile Number:

Occupation:.....

3. Land User(s) Information

(Use an additional sheet in the case of multiple land users.)

Name:.....

Address:

Mobile Number:

Occupation:.....

4. Proposed Site Information

Location or Area (and nearest Town(s)):.....

Amount of land required (total area for subproject and related activities):

.....

Condition of land:.....

Assets on land:.....

(This may include food crops, economic crops and trees, physical structures, etc.)

Current use of land:.....

(This may include farming, cultural uses, collection of medicinal plants and firewood, etc.)

5. Approvals

ESO (initial):

Are there any community/family disputes on the land?Yes:____ No:____

Are the families of the landowner and the relevant land users aware that the land has been donated?Yes:____ No:____

Landowner/Land users (initial/thumbprint):

(Use an additional sheet in the case of multiple land users.)

I have been informed that I am not required or being forced to donate use of my land.

Yes:____ No:____

My family and relevant land users are aware that this land has been donated.

Yes:____ No:____

If any of the responses to the above questions is NO, the site is NOT eligible for land donation.

6. Signatures:

.....
Signature and Name of Landowner

.....
Signature and Name of Landowner's Spouse

.....
Signature and Name of Paramount Chief

.....
Signature and Name of Witness (1)

.....
Signature and Name of Witness (2)

.....
Signature and Name of ESO

Site map
