



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 12/12/2024 | Report No: ESRSC04622

**I. BASIC INFORMATION****A. Basic Operation Data**

|                               |                                                                 |                            |                      |
|-------------------------------|-----------------------------------------------------------------|----------------------------|----------------------|
| Operation ID                  | Product                                                         | Operation Acronym          | Approval Fiscal Year |
| P507588                       | Investment Project Financing (IPF)                              | SLWSP                      | 2026                 |
| Operation Name                | Sierra Leone Water Security and WASH Access Improvement Project |                            |                      |
| Country/Region Code           | Beneficiary country/countries (borrower, recipient)             | Region                     | Practice Area (Lead) |
| Sierra Leone                  | Sierra Leone                                                    | WESTERN AND CENTRAL AFRICA | Water                |
| Borrower(s)                   | Implementing Agency(ies)                                        | Estimated Appraisal Date   | Estimated Board Date |
| Ministry of Finance           | Ministry of Water Resources and Sanitation                      | 14-Apr-2025                | 25-Sep-2025          |
| Estimated Concept Review Date | Total Project Cost                                              |                            |                      |
| 03-Dec-2024                   | 60,000,000.00                                                   |                            |                      |

**Proposed Development Objective**

Increase access to water supply and sanitation services, improve operational performance of the water supply services providers and enhance water resources management in Sierra Leone.

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

No

**C. Summary Description of Proposed Project Activities**

This project will support the country's sustainable Water Resources Management (WRM) and long-term inclusive WASH program prioritizing the urgent interventions to improve water and sanitation services and water sector performance, while at the same time undertaking protection of the water sources in Sierra Leone. The proposed project aims to prioritize urban water supply and sanitation services improvement with a primary focus on Freetown city and selected secondary cities and rural areas. The capacity development support will mainly target the Ministry of Water Resources and Sanitation and the agencies responsible for water resources management and WASH service delivery. It is expected to strengthen the knowledge, management, and monitoring capacity for resilient water resources; improve fecal sludge



management; develop strategic studies to facilitate subsequent phases of the long-term engagement for inclusive, affordable, sustainable, and resilient services.

## **D. Environmental and Social Overview**

### **D.1 Overview of Environmental and Social Project Settings**

Sierra Leone has 3,000 to 3,500mm/year of rainfall, and a rainy season from April to October. It has hill-&-valley landscape, with many rivers & streams. Most of these river crossing points are in pristine locations with ambient noise levels below 45 dB, excellent air quality & high biodiversity. The country's rivers are polluted by mining activities, that use heavy metals in the processes. The pollution is worse in the dry season. Downstream riparian communities are seeking alternative sources of domestic water such as wells, as downstream ecosystems & estuaries are being degraded & silted. It is broadly known that Project activities may take place nationwide, in urban, peri-urban & rural areas, a share of which are expected to be in vulnerable neighborhoods. The Project may provide support for fencing & protection of threatened watershed in the Western Area including in the Guma Valley (GV). There is little or no facilities to collect & store surface water, which limits the Country's capacity to provide clean & safe water supply. The GV Dam in Freetown was constructed to service 500,000 people, but the current population is close to 2 million. The secondary cities are either serviced by mini-dams or rivers, which barely meet their water demand. Most of the infrastructure is outdated with potential risks of getting damaged, with severe consequences on life, property or the distribution system. Sanitation & sewage across the country is poor. The only sewer system in the country is a small grid covering major offices in the central business district of the capital Freetown. The wastewater is not treated, & raw sewage is released into the sea. A Fecal Sludge Treatment Plant (FSTP) was built in Freetown in 2021 combines biogas digestion to generate methane & transform the digested sludge into fertilizer. The Projects intends to support FSTP. The specific Project locations are not identified. If Project locations are identified by appraisal, further details will be included.

### **D.2 Overview of Borrower's Institutional Capacity for Managing Environmental and Social Risks and Impacts**

MWRS will be responsible for Project implementation, including ESF. It will directly implement component 1 on institutional strengthening and integrating the Sanitation mandate and capacity building. MWRS will collaborate with all entities involved in Project implementation: the National Water Resources Management Agency (NWRMA), the Guma Valley Water Company (GVWC) and the Sierra Leone Water Company (SALWACO). Freetown City Council (FCC) and other City councils will implement sub-component on urban WASH services. MWRS does not have a track record for implementing Bank-financed projects, but GVWC was partly involved in the implementation of the Freetown Emergency Recovery Project (FERP), P166075, with an experience in E&S risk management under the Operational Policies (OPs). FERP was implemented by a Project Fiduciary Management Unit (Unit), a unit within Ministry of Finance. It comprised E&S specialists, amongst others, that supervised consultants, contractors and all parties involved in project implementation. MWRS is part of the Bank-supported WASH Poverty Diagnostic and WASH Access Development Program. Environmental conservation and risk management is the responsibility of Environment Protection Agency Sierra Leone (EPASL). Activities having an environmental footprint shall obtain an Environmental Impact Assessment (EIA) license to start work. There are mechanisms in place to ensure compliance. The National Protected Area Authority (NPAA) is responsible for all protected areas, parks and wetlands. EPASL has developed an environmental regulation through WB support, and has benefitted from training on the ESF. There is familiarity with the Bank's ESF by EPASL. Nevertheless, the MWRS requested E&S HEIS support from the Bank to help with Project preparation and train MWRS staff on E&S requirements. Project staff shall include an Environmental, Social and a Gender Based Violence (GBV) Specialist, and shall benefit from capacity building support by the Bank.



## II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

### A. Environmental and Social Risk Classification (ESRC)

Substantial

#### A.1 Environmental Risk Rating

Substantial

The Project's Environmental risk is rated as Substantial. The nature of risks & potential impacts of water infrastructure intervention with potential distribution system failure, due to dated & poor engineering designs or the lack thereof, pollution & infectious disease transmission from handling sewage. There is weak institutional & human capacity to manage & mitigate the risks associated with the Project activities. MWRS & implementing partners shall establish an E&S risk management in accordance with the ESF. The Project is expected to have positive impacts nationwide. > It will contribute towards institutional strengthening & human capital development for service delivery, tools & facilities for water resource management, improvement in urban water & sanitation delivery. It will campaign to eradicate open defecation. The Project does not include studies or the construction of dams. There are E&S risks relating to handling of sewage, small to moderate-scale civil works, potential impact on biodiversity & conflict over erecting a barrier around sensitive ecologies in water catchment areas. Construction-related impacts on noise levels, air & water pollution, occupational & community health & safety are also envisaged. Some of the institutions involved in Project implementation have some knowledge of the Bank's E&S risk management, benefiting from the Freetown Emergency Recovery Project (FERP). MWRS & SALWACO are yet to implement a Bank-financed project. FCC & EPASL are partially involved in the on-going Resilience Urban Sierra Leone Project, processed under the ESF. These institutions will require training on the ESF. EPASL has a rigorous risk assessment process from screening to scoping & a full scale study or ESMP depending on the risk level. A stakeholder consultation & disclosure process is prioritized, with an effective mechanism for grievance redress. The risk rating will be revised as Project details become available at appraisal or implementation.

#### A.2 Social Risk Rating

Substantial

The social risk is rated Substantial. The risks emanate from potential social exclusion, possible resettlement of people who encroached into protected areas of degraded watersheds, creating safe and clean water access in poor neighborhoods and remote areas. The proposed construction of FSTPs in Freetown and selected cities is expected to be on public land, but additional land acquisition cannot be ruled out at this stage. In Sierra Leone, about 20.2% of people have access to safe drinking water. It is expected that poor & vulnerable people are not among them. There is a potential risk that, disadvantaged and vulnerable groups may not be sufficiently included in consultation and decision-making processes. The Project stakeholder engagement design focuses on inclusive participation, information disclosure using appropriate language and media. The Project's civil works could induce labor influx implying potential social risks while interacting with community leading to potential GBV risks. The support to increasing access to WASH services may induce temporary and permanent land acquisition. The Project's support to stopping encroachment along threatened watershed and FSTPs may cause economic and physical displacement. The scope of land take is not known at this stage. There is a potential risk of conflict including with artisanal miners due to construction of barriers in water catchments areas. Considering MWRS's weak institutional capacity in E&S risk management, a strategic institutional capacity building effort is required & will be a special focus as part of the E&S HEIS, which MWRS required. The technical assistance towards design and feasibility studies, ensuring access to vulnerable and disadvantaged groups warrants a social analysis to understand the overall sociocultural dynamics in



water access, sanitation and inform Project design accordingly. The ToRs for various TAs will be reviewed and cleared by the Bank.

## **B. Relevance of Standards and Policies at Concept Stage**

### **B.1 Relevance of Environmental and Social Standards**

#### **ESS1 - Assessment and Management of Environmental and Social Risks and Impacts**

Relevant

The Project will improve water access, sanitation, & hygiene, with institutional support & capacity building. It includes hydrological monitoring, urban water & sanitation improvements, & WASH facilities in secondary cities. Risks include worker safety, pollution, & ecological impacts. Social risks involve community exclusion, labor influx, acquisition of land, & restriction of access to resources. The project may not support asbestos pipe replacement. If, however, works uncover asbestos pipes, there could be significant potential impact on the health of workers & the community, including from mismanaging waste disposal. Sewage handling and FSTP operation may cause health risk to workers and the community, or may pollute the environment. The Project will prepare E&S framework instruments, such as ESMF, SEP and RPF to manage & mitigate subproject specific risks & impacts. Site specific plans will be prepared prior to start of any works.

#### **ESS10 - Stakeholder Engagement and Information Disclosure**

Relevant

The Project's stakeholder engagement design must focus on inclusive participation & information disclosure using appropriate language & media. Key stakeholders include MWRS, NWRMA, GVWC, SALWACO, Freetown City Council, & city councils of selected secondary cities. Beneficiaries include communities with access to clean water, schools, health facilities, students, water service providers, maintenance workers, FSTP users, CSO/NGOs, & those adversely affected by the project. A Stakeholder Engagement Plan (SEP) will be prepared & implemented, proportional to the project's nature, scale, risks, and impacts. The SEP will be disclosed before project appraisal, ensuring consultations are timely, relevant, understandable, & accessible. A documented record of stakeholder engagement will be maintained & publicly disclosed. A project-wide Grievance Redress Mechanism (GRM) will address concerns, including a confidential channel for GBV incidents.

#### **ESS2 - Labor and Working Conditions**

Relevant

Extending access to safely managed water, catchment protection & rehabilitation, design & construction of FSTPs will require mobilization of skilled & unskilled primary, contracted, & primary supplier workers. The potential social risks due to workers & local community interaction, include SEA/SH. The Project footprint across different parts of Sierra Leone will engage skilled & unskilled labor & prioritize sourcing from local areas to minimize the potential for labor influx. Workers' camps are not expected to be necessary. The Project implementing entities will be required to establish a comprehensive labor management procedure, including guidance to develop Health, Safety & Environmental (HSE) plan to protect workers health & safety during construction & operation of water & sanitation facilities, raise grievances, procedures for incident investigation & reporting, emergency preparedness & response.

#### **ESS3 - Resource Efficiency and Pollution Prevention and Management**

Relevant



The Project will require various construction materials like cement, granite aggregates, steel rods, stones, sand, concrete blocks, timber, & water, with a preference for locally sourced, sustainably harvested materials. Suppliers of materials must have EIA permits or related certification. The Project will minimize pollution risk through improved hygiene practices, but handling & treating sewage & operating septic tanks or sewers pose significant hygiene risks. Overflows or leaks from the FSTP and ancillary facility could pollute water or soil, but this will be factored into project design. Moderate risks include air & noise pollution. Non-hazardous & hazardous waste from oil leaks & replaced equipment pose pollution risks. A Waste Management Plan will be prepared to address these. Asbestos containing pipes may expose workers & the community to respiratory hazards, necessitating an Asbestos Management Plan. Drought & sporadic rain could affect the availability of good quality water.

#### **ESS4 - Community Health and Safety**

Relevant

Since some civil work will take place on school and health facilities, the health and safety of students, school staff, health workers, health service visitors, and vulnerable & disadvantaged households & communities will be prioritized. Vehicular accidents, dust emission, noise, trips and falls into excavated sites & trenches, hygiene risk associated with solid waste and sludge treatment, temporary disruption of water distribution systems are potential impacts. All relevant mitigation measures will be taken upfront including robust consultation with key stakeholders surrounding the fecal sludge treatment plant. Children and young people shall be protected from the risk of sexual exploitation and abuse by contractors workers. The universal access concept (access for everyone) shall be considered in the provision of safe and clean water access at schools, health facilities, and community level, including individuals with disabilities.

#### **ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

Relevant

The Project will improve access to safe water, improved toilets and hygiene facilities in schools, health facilities & disadvantaged communities. The Project will target facilities on public land to avoid displacement of people. FSTP on existing municipality owned waste management property. Where displacement cannot be avoided, for example, where protection of degraded watersheds does lead to household relocation from defined watersheds. The Project will implement appropriate mitigation measures in accordance with the Project's Resettlement Framework (RF). At this stage of the Project preparation, the specific sites are unknown, hence the nature and extent of involuntary resettlement impacts remain unclear. To address these uncertainties, the Project will prepare, consult up on, and disclose a RF before the Project appraisal. The RF will guide the preparation of site-specific Resettlement or Livelihood support Plans, tailored to the potential risks of physical or economic displacement.

#### **ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Relevant

Building protective barriers to prevent encroachment on protected sensitive ecologies in the threatened watershed would have profound benefits for the forest ecosystems. However, depending on the type of barrier, ecological corridors might be impacted, but it is not likely that habitat fragmentation or loss of ecosystem services will result from a small scale of activities along existing pipeline corridors, even within protected forest reserve or community forest. Transmission routes typically fall within designated Right of Ways (RoW). There is potential for temporary disturbance to nature and biodiversity from human activity and noise generated by excavation, pipe laying, metal work etc. ESMF will address consistency with ESS6 requirement including an exclusion criterion of activities that may



cause significant risk on biodiversity conservation and apply the mitigation hierarchy and specific measures that will constitute a section on Biodiversity Management under the ESIA/ESMPs.

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

Not Currently Relevant

The Bank has conducted a screening of indigenous peoples and sub-Saharan Africans historically underserved traditional local communities in Sierra Leone. At this stage, no people meet the policy requirements and the application of this standard to the Project is not relevant. Future assessments will determine if this needs to be changed.

**ESS8 - Cultural Heritage**

Relevant

The proposed Project will involve moderate civil works, such as excavations and pipe laying, construction and concrete works. No works is expected to be carried out in cultural heritage areas. Nevertheless, this ESS is conservative deemed relevant. However, the degree of relevance of this ESS will be further assessed during Project preparation as part of the risk management process. Should the Project affect cultural heritage, appropriate steps will be taken to ensure conservation of cultural heritage during all phases of the Project. The ESMF to be prepared for the Project will also include a chance find procedure and outline the steps to be taken if and when an item/s of cultural significance is discovered.

**ESS9 - Financial Intermediaries**

Not Currently Relevant

This standard is not relevant at this stage.

**B.2 Legal Operational Policies that Apply**

**OP 7.50 Operations on International Waterways**

TBD

**OP 7.60 Operations in Disputed Areas**

No

**B.3 Other Salient Features**

**Use of Borrower Framework**

No

The Bank has not conducted an assessment of the Borrower's policy, legal and institutional framework for the implementation of this project.

**Use of Common Approach**

No

Not applicable.

**C. Overview of Required Environmental and Social Risk Management Activities**

**C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by Appraisal?**



The Environmental and social risk management potential risk and impacts assessment and instruments will be sequenced to meet minimum requirements by appraisal and subsequently later by project effectiveness.

Part one: Environmental and social risk management instruments that shall be prepared prior to Project appraisal

1. Environmental and Social Commitment Plan
2. Stakeholder Engagement Plan

Part two: Environmental and social risk management instruments that shall be prepared by project appraisal

1. Environmental and Social Management Framework
2. Social Analysis (including covering the TA aspect)
3. Labor Management Procedure
4. SEA/SH Assessment and Action Plan
5. Resettlement Framework

### III. CONTACT POINT

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