

**THE REPUBLIC OF SIERRA LEONE**

**Ministry of Lands, Housing and Country Planning**

**Sierra Leone Land Administration Project (P177031)**

**ENVIRONMENTAL AND SOCIAL**

**COMMITMENT PLAN (ESCP)**

**May 4, 2022**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Republic of Sierra Leone (the Recipient) shall implement the Sierra Leone Land Administration Project (the Project), with the involvement of the Ministry of Lands, Housing and Country Planning, as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP shall be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of Lands, Housing and Country Planning and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient Minister of Lands, Housing and Country Planning of the Ministry of Lands, Housing and Country Planning. The Recipient shall promptly disclose the updated ESCP.

| **MATERIAL MEASURES AND ACTIONS** | | | **TIMEFRAME** | **RESPONSIBILE ENTITY** |
| --- | --- | --- | --- | --- |
| **MONITORING AND REPORTING** | | | | |
| A | | **REGULAR REPORTING:**  Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to (i) the implementation of the ESCP; ((ii) conditions, if any, which interfere or threaten to interfere with the implementation of the ESCP; and (iii) corrective and preventive measures taken or required to be taken to address such conditions; (iv) status of preparation and implementation of E&S instruments required under the ESCP; (v) stakeholder engagement activities; and (vi) functioning of the grievance redress mechanism. | Bi-annually starting from the Effective Date and throughout the Project implementation. | *PCU/MLHCP* |
| B | | **INCIDENTS AND ACCIDENTS:**  Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including, inter alia, situations of fatalities or serious bodily harm and incidents such as fire injuries, physical violence, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), construction related accidents, COVID-19 outbreak, other communicable diseases and infections in the Project area attributable to the Project. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and including information provided by any contractor and supervising entity, as appropriate.  Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence within timeframe acceptable to the Association. | Within 48 hours after learning of the incident or accident.  Provide subsequent report acceptable to the Association within 20 days of the Association’s request. | *PCU/MLHCP* |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** | | | | |
| 1.1 | | **ORGANIZATIONAL STRUCTURE:**  As part of the implementation of the Project, MLHCP shall:   * Set up the Project Coordination Unit (PCU) within the MLHCP with qualified staff and resources to support management of E&S risks; * Establish the Project Steering Committee (PSC) and the Project Technical Committee (PTC); * Recruit project staff, including Social Development and Gender Specialist, (with expertise in SEA/SH risks and impacts), Monitoring & Evaluation Specialist and Community Engagement and Communication Specialist, and Environmental Specialist (on an as-needed basis); * Hire specialized external expertise/consultants for Project activities as needed, all with terms of reference, experience, and qualifications acceptable to the Association. | Setting up of the PCU to be undertaken prior to the Effective Date. The PCU shall be maintained throughout Project implementation  PSC and PTC are to be formally established within three months after the Effective Date. | *PCU/MLHCP* |
| 1.2 | | **ENVIRONMENTAL AND SOCIAL INSTRUMENTS:**  As part of the Project, the Environmental and Social Management Framework (ESMF), Labour Management Procedures (LMP), Resettlement Policy Framework (RPF) and Stakeholder Engagement Plan (SEP for Project activities have been prepared in a manner acceptable to the Association.  The ESMF includes the World Bank guidelines on environmental health and safety & the World Bank Environmental and Social Standards (ESSs), which form part of the World Bank’s Environmental and Social Framework (ESF); The ESMF sets out the screening procedure for sub-project activities. The ESMF includes Screening Forms to be used to screen all sub-projects to determine whether ESMPs, RAPs, and other E&S instruments must be prepared and implemented prior to sub-project implementation. The RPF shall guide the preparation of RAP to address project related impacts on temporary or permanent land acquisition, restrictions on land use and involuntary resettlement. No civil works or construction shall commence prior to completion of RAP implementation. The SEP shall guide stakeholder consultations throughout project implementation. These instruments shall be updated if and as needed subject to the Association’s “No Objection”. The ESMF and RPF shall be consulted for the development of any site-specific ESS related instruments such as Environmental and Social Management Plans (ESMP) or RAP as may be required.  For the construction of the Land Administration buildings in Freetown and the Regional Headquarters, the project shall prioritize (1) construction on ‘new’ unoccupied land over (2) demolition of an existing structure for the construction of a new one. If the project proceeds with option 2, due to land unavailability, an asbestos audit shall be conducted on the facility to be demolished. If asbestos containing materials are discovered on that facility, an Asbestos Management Plan (AMP) will be prepared and strictly implemented. The asbestos assessment and AMP preparation will be done by an accredited or certified firm or individual with a wealth of experience in handling asbestos materials. The AMP, including the management and disposal of the asbestos materials shall be approved by the EPA or appropriate authority. Demolition of the structure shall not commence until the AMP has been prepared and disclosed by the Recipient following Bank clearance. | The ESMF, LMP, RPF, and SEP have been prepared, disclosed, consulted upon and adopted. All documents shall be implemented throughout Project duration.  Site-specific E&S instruments/Plans (e.g.: ESMPs, RAPs, etc.) shall be prepared, consulted upon, disclosed, and adopted prior to commencement of subproject activities, and thereafter implemented throughout implementation.  Asbestos Management Plan shall be prepared, consulted upon, disclosed, and adopted prior to commencement of demolition of an existing facility for the construction of the Land Administration Building. | *PCU/MLHCP* |
| 1.3 | | **MANAGEMENT OF CONTRACTORS**:  The Recipient shall require the development and implementation of contractor ESMP (C-ESMP) for contractors and subcontractors.  Contractors shall be guided by site-specific Environmental and Social Management Plans (ESMPs), which according to the ESMF shall be prepared, disclosed, consulted upon all relevant stakeholders, finalized to the Association’s satisfaction and adopted prior to tendering of works/services and implementation of site-specific activities.  The Recipient shall ensure that all contracts and subcontracts require suppliers/contractors and subcontractors to comply with the Environmental and Social Instruments referred to above in Section 1.2  Contractors shall be trained on the application of the ESMP, and the project shall monitor the contractor’s compliance with the ESMP’s provisions on a regular basis. | The ESMP shall need to be prepared, disclosed, consulted upon and adopted prior to the launching of the contracted works. Supervise contractors throughout Project implementation. | *PCU/MLHCP* |
| 1.4 | | **TECHNICAL ASSISTANCE**  Ensure that the consultancies, studies (including building designs), capacity building, awareness raising, legal technical assistance, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference. | Throughout project implementation | *PCU/MLHCP* |
| 1.5 | | **CONTINGENT EMERGENCY RESPONSE FINANCING**  Activities carried out under Contingent Emergency Response Components also must meet ESS requirements.  a) If necessary, upon activation of the CERC, revise the ESMF to include a CERC addendum to account for environmental and social risks and impacts of CERC activities.  b) Thereafter prepare, disclose, consult, adopt, and implement any environmental and social (E&S) management plans or other instruments required for the respective CERC activities in accordance with the ESSs, CERC-ESMF, the World Bank Group Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP) including World Health Organization (WHO) guidance documents on COVID-19 in a manner acceptable to the Association. Thereafter implement the measures and actions required under the said E&S management plans or instruments, within the timeframes specified in the plans. | a. CERC-ESMF revision, if necessary, shall be completed on a timeframe acceptable to the Association and before the commencement of relevant CERC activities  b. Implement the measures and actions required under the CERC E&S management plans or instruments, within the timeframes specified in the plans. | *PCU/MLHCP* |
| **ESS 2: LABOR AND WORKING CONDITIONS** | | | | |
| 2.1 | | **LABOR MANAGEMENT PROCEDURES (LMP):**  An LMP has been prepared, in accordance with ESS2 requirements has been disclosed and shall be applied throughout Project implementation.  The LMP sets out how direct workers, contracted workers, and primary supply worker shall be managed, in accordance with the requirements of Sierra Leone national laws and ESS2.  The Recipient shall implement the LMP for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors. The LMP shall be incorporated in the ESHS specifications of the procurement documents and contracts with contractors with requirements for contractors to prepare, adopt, and implement labor management plans as per ESRS. Recipient shall ensure that contractors comply with these requirements of their respective contracts.  The Asbestos Management Plan prepared for the demolition of an existing structure to make room for the construction of new Land Administration building(s), shall provide an OHS Plan, which shall include training workshops on handling and disposal of asbestos, and the use of asbestos-specific personal protective equipment (PPE). | LMP has been prepared and disclosed prior to appraisal and shall be maintained throughout the Project implementation  (see section 1.2) | *PCU/MLHCP* |
| 2.2 | | **GRIEVANCE MECHANISM FOR PROJECT WORKERS**  Establish and operate a grievance mechanism for direct workers, contracted workers, and primary supply workers, as described in the LMP and consistent with ESS2. | Setting up of project workers related GRM to be undertaken within 60 days of effectiveness and prior to the hiring of any workers, and maintained throughout Project implementation | *PCU/MLHCP* |
| 2.3 | | **Gender Assessment, Gender Based Violence, SEA/SH risks and GBV action plan**:  A SEA/SH risk assessment has been conducted. The PCU shall submit a GBV Action Plan to the Association prior to project Board approval.  The Project GBV Action Plan develops and implements measures and actions to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse and sexual harassment (SEA/ SH) related to the Project activities. The GBV Action Plan shall be made available to the public, including to make community members aware of the Project risks and reporting mechanisms.  Workers and communities within Project sites shall be sensitized through frequent toolbox talks and community consultations.  Ensure that contractors require workers to sign and strictly abide by the measures and workers code of conduct. | The GBV action plan will be finalized, disclosed, consulted upon and adopted prior to Board Approval and shall be maintained throughout Project implementation | *PCU/MLHCP* |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** | | | | |
| 3.1 | | **WASTE MANAGEMENT PLAN**  The Recipient shall Adopt and implement a Waste Management Plan (WMP) as part of the ESMPs, to manage hazardous and non-hazardous wastes, consistent with ESS3  The Recipient shall also:   * ensure suppliers and service providers of the Project develop and implement a Waste and Hazardous Materials Management Plan before start of any works * ensure the strict application of these plans through regular monitoring and supervision. Implement waste management measures specified in the ESMP and any other site-specific management plan prepared. | Before construction activities start  Continuous application of the WMP throughout project implementation. | *PCU/MLHCP* |
| 3.2 | | **ASBESTOS CONTAINING MATERIALS (ACM)**  The management, handling and disposal of asbestos containing materials from buildings to be demolished for the construction of the Land Administration building(s) shall be guided by an Asbestos Management Plan (AMP) listed in section 1.2. The AMP shall:   * Be prepared by an internationally certified consultant/firm; * Require approval, monitoring and supervision by EPA or the appropriate authority from planning to disposal of the asbestos materials; * Be strictly implemented. Work cannot procced without the AMP, * Identify a dedicated disposal facility or section within an existing facility for the ACM, * Identify asbestos-specific PPE for workers involved in the demolition exercise, and; * Indicate that the demolition area will be cordoned off over a safe distance during the entire period.   **RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**  Resource efficiency and pollution prevention and management measures are covered under the ESMF. Specific measures shall be included in the ESMPs and C-ESMPs to be prepared before commencement of any civil work | (see section 1.2) | *PCU/MLHCP* |
| **ESS 4: COMMUNITY HEALTH AND SAFETY** | | | | |
| 4.1 | | **TRAFFIC AND ROAD SAFETY**  Consistent with ESS4 and ESMF, and in a manner acceptable to the Association, Project contractors shall be required as part of their ESMP or ESHS Plan to develop and implement measures and actions to assess and manage traffic and road safety risks. | Prior to the implementation of relevant subproject activities. Shall be maintained throughout Project implementation | *PCU/MLHCP* |
| 4.2 | | **COMMUNITY HEALTH AND SAFETY**  Prepare, disclose, and implement measures and action to manage specific risks and impacts to the community arising from Project activities and include these measures in ESMPs required by the ESMF, in a manner acceptable to the Association.  Ensure the Contractor(s) raise awareness of employees on subproject related risks and measures for mitigation of impacts on local communities.  See Section 3.1 on Asbestos Containing Materials from demolition of existing structures | Shall be implemented and maintained throughout Project implementation | *PCU/MLHCP* |
| **ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT** | | | | |
| 5.1 | **RESETTLEMENT POLICY FRAMEWORK:**  The Project has prepared, disclosed, consulted upon and adopt a Resettlement Policy Framework (RPF), which provides policy, strategy, process and procedures that shall guide any potentially required involuntary relocation/resettlement, displacement and compensation processes resulting from civil works/office building renovation and/or constructions or any project-funded activities as provided for in WB ESS5. Once specific intervention areas are determined, Resettlement Action Plans (RAPs) shall be prepared, disclosed, consulted upon and adopted, and thereafter implemented based on the principles outlined in the RPF. | | The RPF has been prepared and disclosed prior to appraisal. Continuous application of the RPF to inform development of site-specific RAPs as needed throughout project implementation | *PCU/MLHCP* |
| 5.2 | **RESETTLEMENT PLANS**  Prepare, disclose, consult, adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, as set out in the RPF, and consistent with ESS5.  Prepare and submit regular monitoring reports on the implementation of Resettlement Action Plans, including issues related to land acquisition, assessment/census of PAPs and compensation, and functioning of resettlement related grievance redress mechanisms. | | Prepare, disclose, consult, adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.  Biannually throughout implementation of RAPs | *PCU/MLHCP* |
| 5.3 | **GRIEVANCE MECHANISM**  The framework for establishing grievance redress mechanism (GRM) to address resettlement or project impact related complaints or feedback from project stakeholders, beneficiaries and project-affected people has been described in the ESMF, RPF, and SEP. The GRM shall be established and made functional after effectiveness. When established, the GRM will provide anonymous reporting & recording channels that is accessible to all and will focus not only on receiving and recording complaints, but also on how complaints are resolved and feedback provided. | | Setting up of resettlement related GRM to be undertaken within 60 days of project effectiveness and prior to beginning any resettlement activities maintained throughout Project implementation | *PCU/MLHCP* |
| **ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES** | | | | |
| 6.1 | **BIODIVERSITY RISKS AND IMPACTS**  Using the screening form in the ESMF, conduct a preliminary screening and assess each of proposed activity/subproject for financing in terms of its risks and impacts on biodiversity and living natural resources. Where the environmental and social assessment has identified potential risks and impacts on biodiversity or habitats, the Borrower shall prepare a Biodiversity Management Plan (BMP) either as stand-alone or as part of the ESMP to manage those risks and impacts in a manner proportionate to the nature and magnitude of the risks and in accordance with the mitigation hierarchy and GIIP.  For activities that are not screened out of the Project, assess, and manage the impacts of Project activities on biodiversity in accordance with ESS6 and adopt mitigation measures as part of subproject ESMPs. | | During subproject screening process and prior to commencement of civil works              Prepare a Biodiversity Management Plan (BMP) if needed; Once approved and disclosed the BMP shall be implemented throughout Project implementation. | PCU/MLHCP |
| **ESS 7: INDIGENOUS PEOPLE/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES** | | | | |
| There are no actions under the Project related to Indigenous People, therefore there are no mitigation measures to be undertaken under ESS7 for the Project. | | | | |
| **ESS 8: CULTURAL HERITAGE** | | | | |
| 8.1 | **CULTURAL HERITAGE RISKS AND IMPACTS**  As per ESMF requirements, conduct a preliminary screening and assess each of proposed activity/subproject for financing in terms of its risks and impacts on physical cultural resources and ensure adverse impacts are appropriately mitigated | | Throughout Project implementation | *PCU/MLHCP* |
| 8.2 | **CHANCE FINDS**  Implement the chance finds procedure described in the ESMF developed for the Project, consistent with ESS8 and ensure they are included in all site specific ESMPs involving subprojects with civil works.  In the event of a find or the observation of a cultural practice, comply with the procedures detailed in the ESMF and contact the relevant government agencies entrusted with the protection of cultural heritage in Sierra Leone to assist with the preservation of such finds | | Throughout Project implementation | *PCU/MLHCP* |
| **ESS 9: FINANCIAL INTERMEDIARIES** | | | | |
| There are no actions under the Project related to Financial Intermediaries, therefore there are no mitigation measures to be undertaken under ESS9 for the Project. | | | | |
| **ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE** | | | | |
| 10.1 | | **STAKEHOLDER ENGAGEMENT PLAN IMPLEMENTATION**  A Project wide Stakeholder Engagement Plan (SEP) has been prepared, disclosed, consulted upon and adopted, which shall ensure full compliance to all the requirements of ESS 10. The SEP provides a strategic framework that would ensure open, inclusive and transparent engagement of all relevant stakeholders in the project design and implementation, with safeguards for vulnerable groups, particularly women, persons with disability and youth. | The SEP has been prepared and disclosed prior to appraisal and shall be implemented throughout the Project duration. | *PCU/MLHCP* |
| 10.2 | | **PROJECT GRIEVANCE MECHANISM:**  A Project level GRM shall be established per the SEP recommendations. | Setting up of GRM to be undertaken within 60 days of project effectiveness. | *PCU/MLHCP* |
| **CAPACITY SUPPORT (TRAINING)** | | | | |
| CS1 | | Project level ESF capacity building conducted for MLHCP and PCU staff to include the following training:  The Project’s GRM  Stakeholder roles and engagement  Subproject Environmental and Social screening  Occupational Health and Safety and Emergency preparedness and response  SEA/SH Risk Mitigation  gender and Disability inclusion in SLLAP  COVID-19 mitigation   * E&S Documentation and reporting | ESF training to be undertaken within 4 months of signing the Financing Agreement. | *PCU/MLHCP* |
| CS2 | | Training of contractors in E&S requirements relevant for their assignments | Training of contractors prior to commencement of any works or services and refresher trainings throughout implementation of contract if and as needed | *PCU/MLHCP* |
| CS3 | | Training of project workers in LMP | Training of contractors prior to commencement of any works or services and refresher trainings throughout implementation of contract if and as needed | *PCU/MLHCP* |