SLLAP CONSTRUCTION WORK - BO CITY SITE ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN

SIERRA LEONE LAND ADMINISTRATION PROJECT
(P177031)

JULY 1, 2025

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LIST OF ACRONYMS

CERC Contingency Emergency Response Component

EPA	Environmental Protection Agency
CSO	Civil Society organization
EMS	Environmental Management Specialist
ESHS	Environmental, Social, Health, and Safety
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Safeguards
ESMP	Environmental and Social Management Plan
C-ESMP	Contractor's Environmental and Social Management Plan
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
ICT	Information and Communication Technology
LIS	Land Information System
MDAs	Ministries Departments and Agencies
MLHCP	Ministry of Lands, Housing and Country Planning
NGO	Non-Governmental Organization
NLC	National Land Commission
OHS	Occupational Health and Safety
OSHE	Occupational Safety, Health and Working Environment
PAP	Project Affected Person
PCU	Project Coordination Unit
PDO	Project Development Objective
	Project Grievance Committee
PIC	Public Information Campaign
PSC	Project Steering Committee
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SGS	Social and Gender Specialist
SLLAP	Sierra Leone Land Administration Project
SLSB	Sierra Leone Standard Bureau
TBD	To be determined
WB	World Bank
WC	Ward Committee

1 EXECUTIVE SUMMARY

This Environmental & Social Management Plan (ESMP) is for the construction and operation of a 445sq m single storey administrative building to house the National Land Commission Regional Office in Bo as part of Component 1 of the Sierra Leone Land Administration Project (SLLAP). The objective of this is to enhance operational efficiency, client services, and overall functionality for land administration in the Southern Province of Sierra Leone.

The Project has 4 components namely:

- Component 1: Institutional Development and Legal Reform
- Component 2: Land Information System
- Component 3: Building human capital and institutional capacity
- Component 4: Project Management
- Component 5: Contingency Emergency Response Component (CERC)

The project site is 1.2194 Acres of land on Hospital Road, Reservation, Bo City. It is located directly opposite the Bo District Council office.

The Legal and Institutional Framework relevant to this activity is presented in the table below:

National Legislation & Policies	**International Standards**	**Institutional Framework**
The Constitution of Sierra Leone	ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Ministry of Land, Housing and Country Planning
Environment Protection Agency Act, 2008, 2010, 2022	ESS2: Labour and Working Conditions	The Sierra Leone Environment Protection Agency
The Factories Act 1974	ESS3: Resource Efficiency and Pollution Prevention and Management	Ministry of Works and Public Assets
The Gender Empowerment & Women's Empowerment Act	ESS4: Community Health	The Ministry of Employment, Labour and Social Security
The Prevention and Control of HIV/AIDS Act, 2007	ESS5: [1] Land Acquisition, Restrictions on land Use and Involuntary Resettlement	Bo City and District Councils
	ESS8: Cultural Heritage	
The Child Rights Act, 2007	ESS10: Stakeholder Engagement and Information Disclosure	
The Employment Act, 2023		
The National Biodiversity Strategy & Action Plan (2017 – 2026)		
The National Workplace HIV/AIDS Policy		
National Environmental Policy of 1994		

In terms of ecology the site dominant flora is the nine *Gmelina arborea* trees, renowned for their fast growth and timber utility in Sierra Leone. One vulnerable tree species, *Milicia regia*, tropical tree within the Moraceae family is present on the site. Fauna noted onsite is limited to wild pigeons, squirrels, rodents and

[1] Although activities have not led to physical or economic displacement, a couple of community members were using the land for seasonal crop cultivation. There has been series of engagement with these community members, allowed to harvest their crops, and have been informed that the land would no longer available for their use

other such species common to Sierra Leone and threatened (Vulnerable) by habitat degradation and logging activities.

Impacts and proposed mitigation methods are synonymous with small scale urban construction projects and focus on reducing nuisance noise and dust emissions, occupational health and safety, community health and safety, waste management, managing the risk of soil and water pollution and ensuring the workforce is educated in the critical areas of Gender Based Violence / Sexual Harassment / Sexual Exploitation & Abuse (GBV/SH/SEA) and similar social safeguards. A GBV/SH/SEA code of conduct has also been developed for adoption by the contractor.

The Project has launched a dedicated culturally appropriate Grievance Mechanism that will ensure grievances are managed in line with ESS10: Stakeholder Engagement and Information Disclosure and national legislation.

The geology of site and surrounding is characterised by granite and granulite rocks, which are igneous rocks formed from the solidification of magma or lava like much of Bo City. These rocks are renowned for their durability and resistance to weathering.

According to the soil survey classification 1979, the project site is situated on the most common soil type in Bo City, known as Bo sandy loam. This type of soil has a brownish to reddish colour, with very gravelly and clay loams to clays texture, and suitable for growing vegetables and tree crops

The CO, SO_2, NO_2, and P.M 2.5 & P.M 10 parameters were investigated using a portable Aeroqual Series 500 portable air quality monitor mounted 1.5 meters above ground, away from disturbances, ensuring representative air monitoring. Each measurement location was monitored for an average of one hour, and the results were compared against World Health Organization (WHO) and the Sierra Leone Standard Bureau (SLSB) standards as applicable.

Particulate dust levels (PM2.5 & PM 10) were within WHO & SLSB guidelines respectively at both locations during the morning sampling and above the guideline PM levels during afternoon sampling. As sample locations are adjacent to dirt roads the increased activity on the roads from morning to afternoon are the most likely cause of the decrease in air quality throughout the day.

SO_2, NO_2 & CO levels were well within both the WHO and SLSB guidelines for air quality. It was noted that as with particulate matter there is a noticeable reduction in air quality between morning and afternoon sampling.

Ambient noise levels collected using a Peak Teach P8005 digital sound were on average 55.3 with a range of 47.45 min - 67.93 max.

The water quality assessment of the nearest Kortubuma stream results show that the pH value is neutral, and that electrical conductivity, turbidity, and total dissolved solid values are within the SLSB standard for effluent. Chemical analysis indicates the presence of trace amounts of manganese, nitrate, nitrite, potassium, phosphate, silica, sulphite, iron, aluminium, arsenic, and chromium, with some parameters slightly exceeding WHO guidelines. Biological analysis shows no presence of *E. coli*, but the test reveals the presence of faecal coliforms and non-faecal coliforms, indicating faecal contamination.

The economic landscape of Bo City is shaped by its status as a major urban hub. The city's economic activities encompass a wide range of sectors, including trade, services, and small-scale industries. Residents of Bo engage in various livelihoods, from formal employment opportunities within government institutions to informal sector activities like street vending and market trading. The city is dubbed the economic engine of the Southern Province, contributing about 7.4% of the national GDP and also has several educational institutions, ranging from pre-primary to tertiary level. It has the second oldest secondary school in the country, the Bo Government Secondary School and many tertiary institutions including Njala University.

Mitigation measures were prescribed to minimise any potential adverse environmental and social impacts to acceptable levels, in line with the mitigation hierarchy. Potential impacts were limited to those

synonymous with impacts from small scale construction such as the influx of workers into the communities and the risk of GBV//SEA.

Potential impacts and mitigation measures were prescribed for risks to land use, air quality, occupational health and safety, noise, flora and fauna, waste management, contamination of the nearby Kotobuiyei stream. The cost of implementing this ESMP is estimated at $74,000.

2 INTRODUCTION

2.1 PURPOSE OF THE ESMP

This Environmental and Social Management Plan (ESMP) Environmental and social management plan (ESMP) details the measures to be taken during the construction and operation of the National Land Commissions Administrative Building to eliminate or offset adverse environmental and social impacts, or to reduce them to acceptable levels; and the actions needed to implement these measures.

The main objective of the Environmental and Social Management Plan is to mitigate the various adverse impacts and enhance the positive impacts of the project.

2.2 METHODOLOGY

This ESMP was developed with a combination of literature review, field visits, key stakeholder consultations, collection of primary data and analysis based on the data, experience, the legislative and administrative framework, and practise.

Data was generated by collecting primary data i.e. field measurements for environmental data (e.g. noise and dust) and socioeconomic surveys for social data based on twenty-three in-person interviews of fifteen men and eight women from the surrounding community using a prepared questionnaire. The site was also visited several times to understand the lay of the land and understand the implications of the construction activities on the surrounding receptors especially the nearby Bo City Council office complex, the surrounding community and the nearby Kotobuiyei Stream. In excess of twenty key stakeholders were interviewed at the national and district (Kenema) levels ranging from members of government Ministries Departments and Agencies (MDAs) to Non-Governmental Organisations (NGO) and local government.

Literature reviews and key stakeholder interviews (Annex 5) were the main sources of information on the administrative and legal framework and their implications on the planned construction.

2.3 PROJECT BACKGROUND

On behalf of the Government of Sierra Leone, The Ministry of Land Housing and Country Planning (MLHCP) is currently implementing the World Bank Funded Sierra Leone Land Administration Project (SLLAP).

The Project Development Objective is to establish an efficient and accessible land administration system. The project will be financed through a US$41 million World Bank International Development Agency grant and implemented through various components, which are briefly described below.

2.3.1 SLLAP Project Components

1. Component 1: Institutional Development and Legal Reform.

Under this component, the project will strengthen Sierra Leone's legal and institutional framework for land administration by supporting analyses and reform of the relevant legal framework, buildings, operational support, institutional strategies, capacity building, and sensitization campaigns

2. Component 2: Land Information System (LIS)

Under this component, the project will finance the procurement of required ICT equipment and establishing appropriate Information and Communication Technology (ICT) infrastructure, business processes re-engineering, design, and development of a modern LIS for automation of land administration processes, digitization of paper archives, containing deeds and cadastral maps, development of ICT and digital archive

strategies, conducting cyber-security audit, and providing base maps and a geodetic network. A key design principle of the LIS will be to enable the storage of gender-disaggregated land data.

3. Component 3: Building Human Capital and Institutional Capacity

The primary focus of this component is to improve records of land tenure rights and the processes how these rights can be transferred whether by inheritance, sale, or lease, or for some other third-party rights. This will involve both mapping the parcels and assessing the legal and legitimate rights to those parcels. This will require participatory processes and involve a large cadre of people to visit, raise awareness, discuss with owners about their land and rights and to undertake surveys and prepare documents. This component will finance primary data collection on land ownership and location, which will feed into the LIS supported under component 2.

4. Component 4: Project Management.

This component will support building the human capacity of the Project Coordination Unit (PCU) and finance all expenses required to ensure efficient and transparent project management and coordination

5. Component 5: Contingency Emergency Response Component (CERC)

Following an eligible crisis or emergency, the Recipient may request the World Bank to re-allocate project funds to support emergency response and reconstruction. This component would draw from the uncommitted grant resources under the project from other project components to cover emergency response.

Please refers to the project Appraisal Document for further details.

2.3.2 Civil Works under Component 1

As part of Component 1 the Project will construct new administrative buildings and related infrastructure for the National Land Commission (NLC) in the capital, Freetown (headquarters) and in the provinces of Bo, Makeni, Kenema, and Port Loko.

This ESMP is for the construction and operation of a single storey administrative building to house the National Land Commission Head Quarter in Bo. (See Design Report for details on design).

The following activities are expected:

a) Very limited clearing of vegetation and trees for construction work;

b) Excavation, earth moving and clearing;

c) Disposal of construction wastes, fuel oils and other chemical wastes;

d) Transportation of equipment and materials to the sites involving medium to heavy-duty trucks carrying loads to the various construction sites;

e) Electrical, water and other installations;

f) Complete fencing of the facilities-block and steel reinforcement to increase the height and strength of the fence;

g) construction materials including local and imported materials like cement, steel rods, timber, sand, aggregate/granite, and water;

h) sand, granite/aggregate and water;

i) creation of temporary on-site facilities

2.3.3 Project Location

Administrative Buildings for the National Lands Commission will be constructed in Freetown, Port Loko, Bo, Kenema and Makeni.

The proposed NLC headquarter in the southern province of Sierra Leone will be constructed in Bo City, Bo District. This project site covers a flat area of approximately 1.2194 Acres (4935m^2) in Bo Reservation,

Hospital Road, Bo City. It is located directly opposite the Bo District Council office. The Sierra Leone government owns the project site and its surroundings, the locality known as Bo Reservation. The project site is bordered to northwest and southwest by a cultivated swamp, the Northeast and Southeast by lands claimed by private individuals and the North by a mix of private and government housing.

Site selection criteria prioritised land owned by national or local government not encumbered by squatters, illegal structures or economic activities that would require significant resettlement economic or otherwise. The Bo design follows a standard template (with the exclusion of Freetown) of a single level 445sq m building at about 30cm above ground, housing the main reception area, public offices, Commissioner's and executive offices and building support services. The approximate floor area is about 200m^2

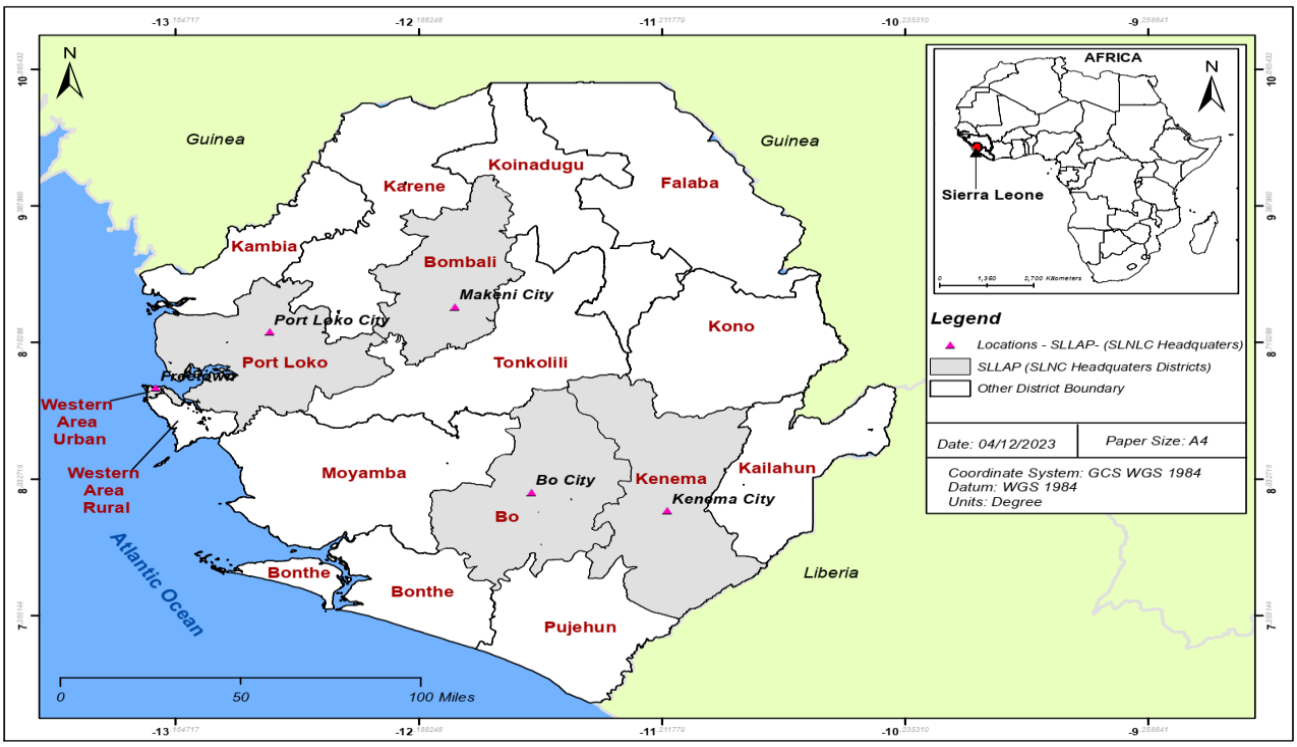

Figure 1: Planned NCL Office Locations across Sierra Leone

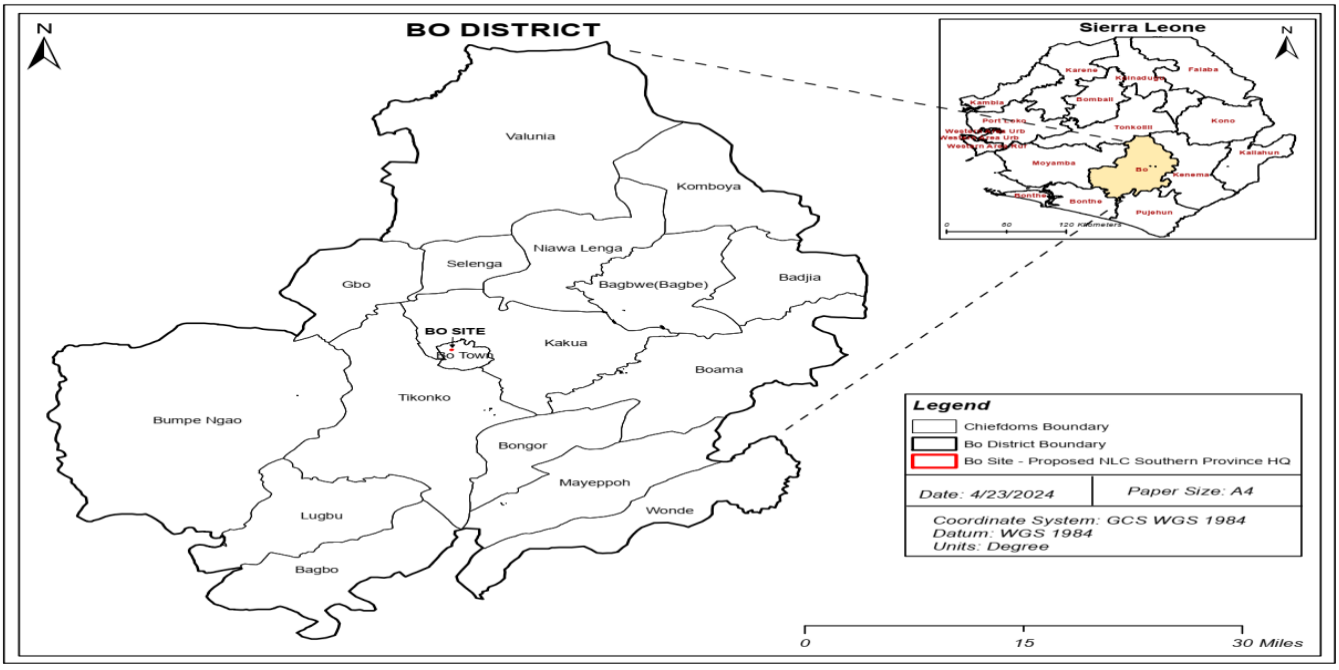

Figure 2: Location of proposed office in Bo District

Table 1: Site Coordinates

No	Northings	Eastings
1	881830.72	197216.03
2	881890.20	197246.70
3	881869.24	197294.92
4	881812.00	197244.57

Figure 3: Ariel view of site for Bo NCL Office

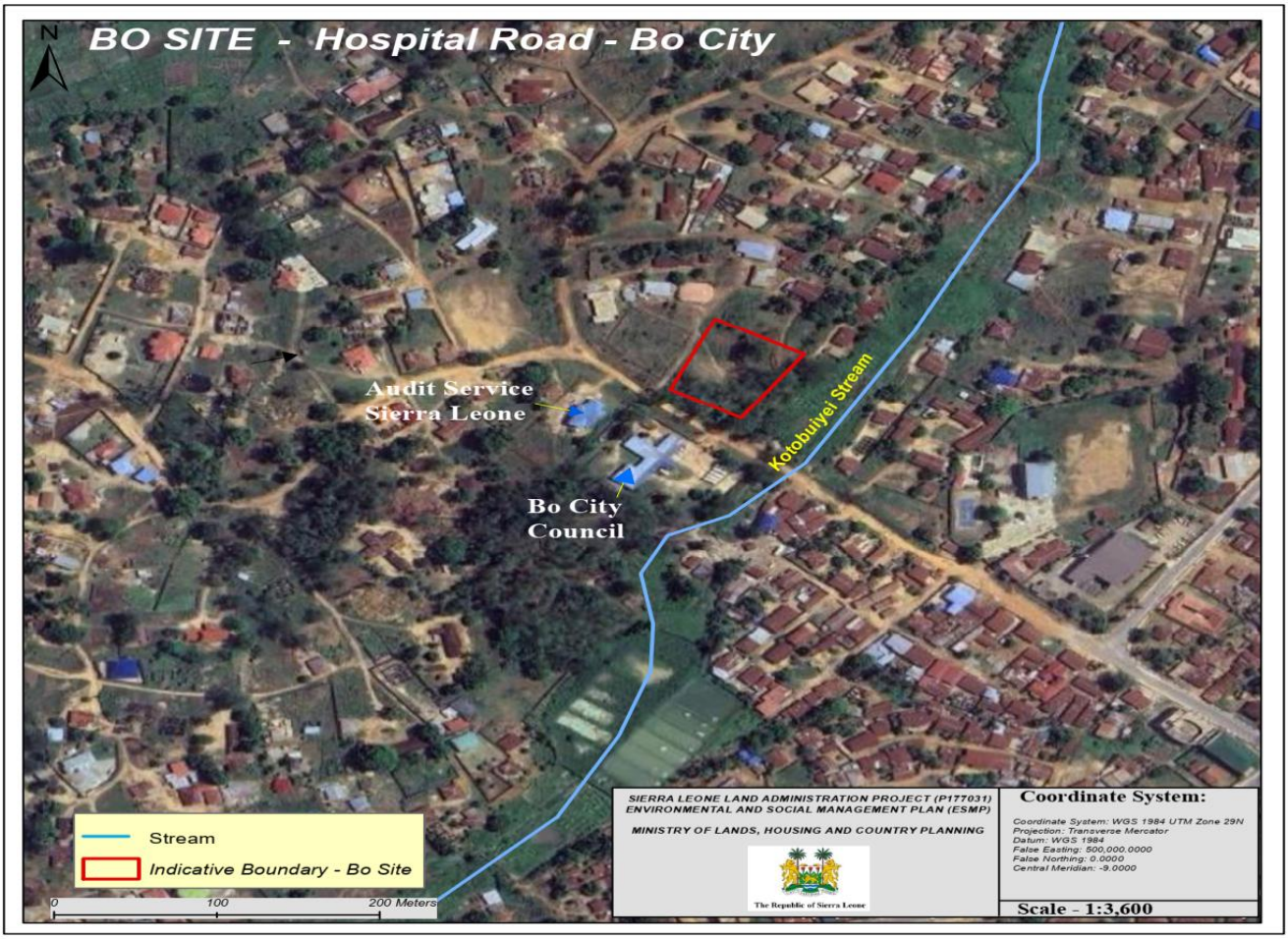

Figure 4: Ariel view of construction site showing general locality

2.4 SUB PROJECT DESCRIPTION

Within Component 1 (Institutional Development and Legal Reform) SLLAP allocates funds for the construction of a single story modernized Administration Office building for the newly established NLC in Bo to enhance operational efficiency, client services, and overall functionality for land administration in Sierra Leone.

2.4.1 Sub Project Phases

2.4.1.1 Pre-Construction / Preparatory

During this phase of the intervention detailed assessments of the project location will be conducted. These assessments will not only cover environment and social but will look into other factors that will contribute to finalising the construction approach and design of the structure to be constructed such as geotechnical investigations, etc.

As the land is already own and in the full possession of the government of Sierra Leone and there are no squatters or persons that would need to be economically resettled (e.g. subsistence farmers). The key stakeholders that need to be contacted outside of institutional stakeholders are the neighbouring properties. These neighbours include the Bo City Council Complex and a mix of private and government owned residences, nine of which are within a 100m of the construction site. The Inland Valley Swamp is used for rice cultivation but separated from the project land by access road. Annex 5: Stakeholder Engagement details (proof of engagement) contains details of stakeholder consultations. There are four private residences with an average of seven to eight persons per residence.

In the recruitment of a contractor by the PCU, a significant factor of this recruitment should be the contractor's awareness of and preferably experience in constructing buildings in alignment with the World Bank environmental, social and occupational health and safety framework requirements. Before commencement of works the contractor will be required to prepare a CESMP in line with the Bank's ESF detailing how it will manage the environmental, social and OHS risks and impacts during construction.

Trees and vegetation within the site will be removed in a manner that adheres to environmental regulations and guidelines, mainly with regards to only removing what is necessary for construction purposes.

2.4.1.2 Construction

This will involve mobilization of people and equipment to site. Except for clearing and grubbing the site (removal of vegetation) and excavating for the foundations, the use of heavy equipment is expected to be limited at the site. The rest of the construction is expected to be conducted with a mix of light equipment and manual labour as would be expected for the construction of what is for all intents and purposes a large single story office building

2.4.1.3 Demobilisation and Post- Construction

This stage involves the demobilisation of the contractor from site i.e. removal of construction equipment, materials, stores and any facilities. This leads immediately to the operational stage of the interventions.

2.4.1.4 Operation

At this stage, construction activities would have been concluded, and the site would have been handed over for use by the Land Commission.

3 LEGAL & INSTITUTIONAL FRAMEWORK

3.1 LEGAL FRAMEWORK

3.1.1 National

3.1.1.1 Environment Protection Agency Act, 2008, 2010, 2022

The Environmental Protection Agency (EPA) Act 2008 amended in 2022 is the government of Sierra Leone's overarching legislation that deals with the protection of the environment. The Environment Protection Agency was established with a Board of Directors set up as its governing body. Subject to this Act, the control and supervision of the Agency is the responsibility of the Board, whose administrative functions as stipulated by the EPA, 2008.

The EPA acts set out the process for securing an ESIA licence *International Agreements and Conventions ratified by Sierra Leone.* .Agreement /Convention	Adopted	Ratified	Focal Point	Focus Area
UN Convention on Law of the Sea (UNCLOS)	December 10, 1982	December 12, 1994	Ministry of Marine Resources and Fisheries Sierra Leone Maritime Administration (SLMA)	It outlines the rights and obligations of nations in relation to their use of the oceans, covering areas such as navigation, resource exploitation, environmental protection, and marine scientific research.
UN Convention on Biological Diversity (UNCBD)	May 1992	12 December 1994	Ministry of Environment and Climate Change EPA	Conservation of biological diversity and to promote the sustainable use of natural resources

Cartagena Protocol on Bio safely. to the Convention on Biological Diversity (Cartagena Protocol)	Jan, 2000	2003	Ministry of Environment and Climate Change EPA	Protection from effects of modern technology
Convention on Wetlands of International Importance (RAMSAR Convention)	13 April 2000.	June 2005	Ministry of Environment and Climate Change National Protected Area Authority	Wetlands
Convention on International trade in Endangered Species of Wild Fauna and Flora (CITES)	March 3, 1973	16 January 1995	Ministry of Environment and Climate Change Forestry Division	Endangered species
UN Convention to Combat Desertification (UNCCD)	June 1994	25th September 1995	Ministry of Lands, Housing, and country planning Ministry of Environment and Climate Change	Desertification
UN Framework Convention on Climate Change (UNFCC)	May 1992	April 1996	Ministry of Environment and Climate Change Meteorological department	Climate change
Kyoto Protocol to the UN Convention on Climate Change (Kyoto Protocol)	Dec. 1997	Advanced stage	Ministry of Environment and Climate Change Meteorological Department	Climate change
Bamako Convention on the ban of the Import into Africa and the Control of Trans-Boundary Movement and Management of Hazardous Wastes within Africa. (BAMAKO Convention)	Jan 1991	April 1993	Ministry of Environment and Climate Change EPA	Trans-boundary Movement and Management of Hazardous Wastes within Africa
Convention for Cooperation of the Protection of the Marine and Coastal Environment of West and Central Africa region. (ABIDJAN Convention)		7th June 2005	Ministry of Environment and Climate Change EPA	Marine and Coastal Management

Basel Convention on the Control of Trans-Boundary Movements of Hazardous wastes. (BASEL Convention)	Mar. 1989	April 1993	Ministry of Environment and Climate Change EPA	Trans-boundary Movements of Hazardous wastes
Convention on the Prior Informed Consent procedure for Certain Hazardous Chemicals and Pesticides in International trade. (Rotterdam (PIC) Convention.)	10 September, 1998	1 November, 2016	Ministry of Environment and Climate Change EPA	Hazardous Chemicals and Pesticides
Convention on Persistent Organic Pollutants. (Stockholm (POPs) Convention)	22 May, 2001	26 September 2003	Ministry of Environment and Climate Change EPA	Persistent Organic Pollutants.
Convention on the Protection of the Stratospheric Ozone Layer. (Vienna Convention)	Sept 1987	April 1993	Ministry of Environment and Climate Change EPA	Protection of Ozone Layer
Montreal protocol on Substances that Deplete the Ozone Layer (MONTREAL Convention)	Sept 1987	April 1993	Ministry of Environment and Climate Change EPA	Protection of Ozone Layer
Convention on the Protection of Cultural and Natural Heritage (World Heritage Convention)	16 November, 1972	7 January, 2005	Ministry of Tourism and Cultural Affairs National Protected Area Authority (NPAA)	Protection of Heritage sites
The Paris Agreement	December 12, 2015,	November 1, 2016	Ministry of Environment and Climate Change EPA	Reduction of greenhouse gas emissions

1. World Bank Environmental and Social Standards triggered by these interventions.

The project will strive to meet the Bank's requirement, the national regulations and international conventions applicable to Sierra Leone. In the event of a gap, the more stringent policy / legislation will apply.

3.2 INSTITUTIONAL FRAMEWORK

3.2.1 Ministry of Lands Housing & Country Planning

The Ministry of Lands, Housing and Country Planning (MLHCP) is mandated to effectively and sustainably manage and administer the nation's land resource, and to facilitate equitable access to and control over land within the context of food security, poverty alleviation, housing provision and economic growth.

On behalf of the Government of Sierra Leone, the Ministry of Lands, Housing & Country Planning (MLHCP) is currently implementing the World Bank funded The Sierra Leone Land Administration Project. The project is funded by a $41M grant from the World Bank. The Project Coordination Unit (PCU) of the SLLAP is housed within the Ministry and has the overall responsibility for the implementation of the Project.

3.2.2 Sierra Leone Environment Protection Agency (EPA-SL)

The Environment Protection Agency was set up to replace the National Commission for Environment and Forestry (NaCEF), which was mandated to oversee issues pertaining to the environment and forestry.

The EPA-SL will ensure that the project meets and maintains the local requirements of ESMP. The Project ESMF, which has been prepared and disclosed require SLLAP to prepare site specific ESMPs for the NLC offices in compliance with terms and conditions of the EPA.

3.2.3 Ministry of Works and Public Assets

The Ministry of Works and Public Assets is charged with the responsibility to design, co-ordinate and monitor the implementation of policies and programmes for the development of physical and social infrastructure (buildings, roads) and management of public assets.

3.2.4 The Ministry of Labour of Employment Labour and Social Security

The mandate of the Ministry is to develop and administer labour and social security regulations and policies, maintain cordial industrial relations among operatives in the labour market, ensure OHS in workplaces and provide social security. The activities of this Ministry are guided by the Employment Act, 2023.

3.2.4.1 Labour & Employment Commission

The Commissioner of Labour is the head of the professional wing of the Ministry of Employment, Labour and Social Security (MELSS) in Sierra Leone. The Employment Act of 2023 established the Commissioner of Labour and Employment and defined their powers.

3.2.5 Bo City & District Councils

The 2016 Local Government Act stipulates that a local council shall be the highest political authority in the locality and shall have legislative and executive powers to be exercised in accordance with this Act or any other enactment. The Bo City and the District Councils represent the political and administrative leadership of Bo District.

As the highest local political authorities in the Bo District the councils must be consulted during the implementation and planning process. Environmental & Social Baseline

4 ENVIRONMENTAL & SOCIAL BASELINE

4.1 ENVIRONMENTAL BASELINE

4.1.1 Topography and Geology

The site sits at an elevation between 101 and 105 meters above sea level indicating that it is relatively flat.

The geology of site and surrounding is characterised by granite and granulite rocks, which are igneous rocks formed from the solidification of magma or lava like much of Bo City. These rocks are renowned for their durability and resistance to weathering.

4.1.2 Soil

Bo City is located on low-lying plains with scattered small hills, which sit on a Precambrian granite complex and local granulite. According to the soil survey classification 1979, the project site is situated on the most common soil type in Bo City, known as Bo sandy loam. This type of soil has a brownish to reddish colour, with very gravelly and clay loams to clays texture, and suitable for growing vegetables and tree crops.

4.1.3 Climate

Sierra Leone's climate is tropical with two seasons, the rainy season and the dry season. The country has an average humidity ranging between 40 to 90%. The rainy season commences between April/May and

runs till October/November, while the country experiences the dry season from November/December to April/ May when the rain cycle begins. Daily temperatures usually vary between 25°C and 34°C. Lower temperatures are experienced during the Harmattan period which usually occur between December and February where dry winds blow south easterly from the Sahara Desert.

Historically, the normal temperature range for Bo is between 19.4°C and 33.8°C, with temperatures known to drop during the Harmattan season to as low as 18^0C. Relative humidity level ranging between 85% and 95%.

National annual rainfall values experienced over the years varies from 2000 – 5000mm annually. The coastal areas including the capital Freetown experiences mean annual rainfall between 3,000 to 5000mm, while Bo averaged 2,340mm.

4.1.4 Air Quality & Noise Quality

The Bo site is situated in close proximity to the city's government administrative buildings, a mix of government housing quarters and privately owned houses and dual-track gravel road that connects Bo Reservation with the Bo-Kemena Highway and the Bo City centre. There is a cultivated swamp located within 50m of the site boundary in the northwest and southwest areas.

With the exception of generators (electricity), motorbikes, light and heavy vehicles on the gravel road which generates dust during the dry season, there are no other significant activities contributing to air pollution. Similarly, there are no significant sources of noise pollution except for the light and heavy vehicles that pass along the gravel roads and generators used to generate electricity or offices and residences.

An Air Quality and Noise level survey was conducted in Bo on October 28th—29th, 2023, to provide baseline data for these parameters.

Table 2: Air & Noise Monitoring Location

Location	ID	Description	Eastings	Northings
Bo City	BANMP1	Intersection close to field and Kiss 104 FM Radio	197401	881695
Bo City	BANMP2	NASSIT and Hospital Road Intersection	197097	881888

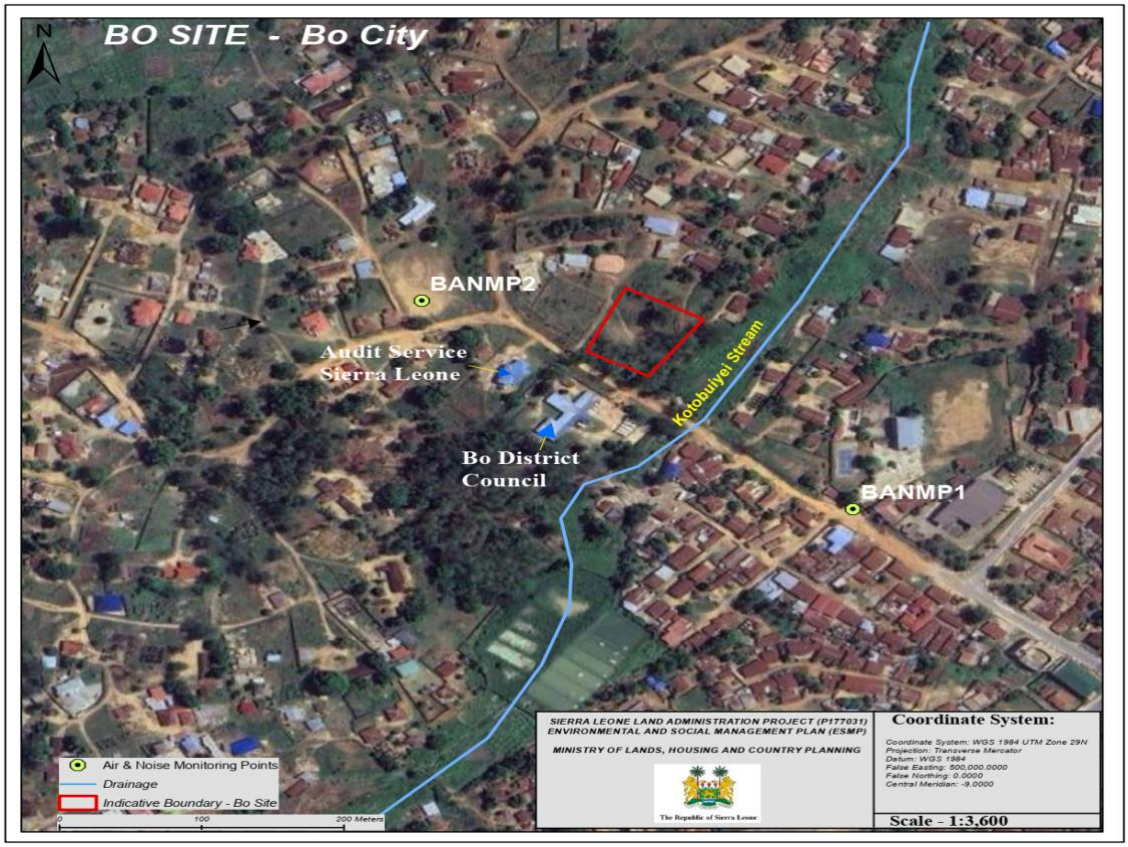

Figure 5: Map of Air and Noise Monitoring Points

Figure 6: Noise & Dust Monitoring

4.1.4.1 Air Quality

The following parameters were investigated using a portable Aeroqual Series 500 portable air quality monitor: CO SO_2, NO_2, and P.M 2.5 & P.M 10. The monitor was mounted 1.5 meters above ground, away from disturbances, ensuring representative air monitoring. Each measurement location was monitored for an average of one hour, and the results were compared against World Health Organization (WHO) and the Sierra Leone Standard Bureau (SLSB) standards as applicable.

Date	Time	Location ID	$PM_{2.5}$, µg/m³	PM_{10}, µg/m³	SO_2, µg/m³	NO_2, µg/m³	CO µg/m³
SLSB Standard Values, µg/m3			25	50	500	200	3,000
WHO Guideline Values, µg/m3			25	50	500	200	3,000
28/10/23	9:43 –10:43	BANMP1	17.9	45.9	24.7	1.8	0.31
28/10/23	14:20 –15:20	BANMP2	28.5	126.5	52.8	1.9	0.55
29/10/23	15:30 –16:30	BANMP1	26.3	111.2	59.7	2.9	0.61

29/10/23	11:20 –12:20	BANMP2	19.7	51.9	33.7	2.3	0.27

Particulate dust levels (PM2.5 & PM 10) were within WHO & SLSB guidelines at both locations during the morning sampling and above the guideline PM levels during afternoon sampling. As sample locations are adjacent to dirt roads the increased activity on the roads from morning to afternoon are the most likely cause of the decrease in air quality throughout the day.

SO_2, NO_2 & CO levels were well within both the WHO and SLSB guidelines for air quality. It was noted that as with particulate matter there is a noticeable reduction in air quality between morning and afternoon sampling.

4.1.4.2 Noise Quality

Ambient noise levels were collected using a PeakTeach P8005 digital sound meter mounted 1.5m from the ground, for one hour during the morning and afternoon at each monitoring site (see Figure 5: Map of Air and Noise Monitoring Points).

Table 3: Ambient Noise Levels

Date	Time	Location ID	Average LAeq, dB(A))	Average LAeq, dB(A) min	Average LAeq, dB(A) max	WHO/WBG/IFC standard LAeq, dB(A) (Daytime Noise Level)
28/10/23	10:43 –11:43	BANMP1	54.9	46.9	70.2	55
28/10/23	14:20 –15:20	BANMP2	56.8	49.7	67.2	55
29/10/23	9:55 – 10:55	BANMP1	54.8	49.0	68.9	55
29/10/23	13:30 –14:20	BANMP2	54.7	44.2	65.4	55

Average noise levels are within WHO standards for daytime noise with the exception of BANMP2 in the afternoon. Noise spikes noted at both locations during sampling were attributable to the movement of vehicles, residential and office activities during the monitoring period.

4.1.5 Hydrology and Water Quality

4.1.5.1 Surface Water

The Sewa River is the primary watercourse near the Project's area of influence in Sierra Leone, located at a distance of approximately 11.3 Km from the Bo site. Bo City drains in the Sewa Basin. The Sewa Basin is the largest basin in Sierra Leone with a total catchment area of approximately 19,022 Km^2[1].

The Kotobuiyei stream originates approximately 350 meters north-east of the Bo Site and flows past the Bo site in a north-east to south-east direction. The Kotobuiyei stream joins three other streams which empty into the Jagboa stream. The Kotobuiyei stream, like other streams/swamps in Bo city, is used for farming. The stream/swamp is approximately 50 meters from the site boundary.

[1] https://wateractionhub.org/geos/country/196/d/sierra-leone/

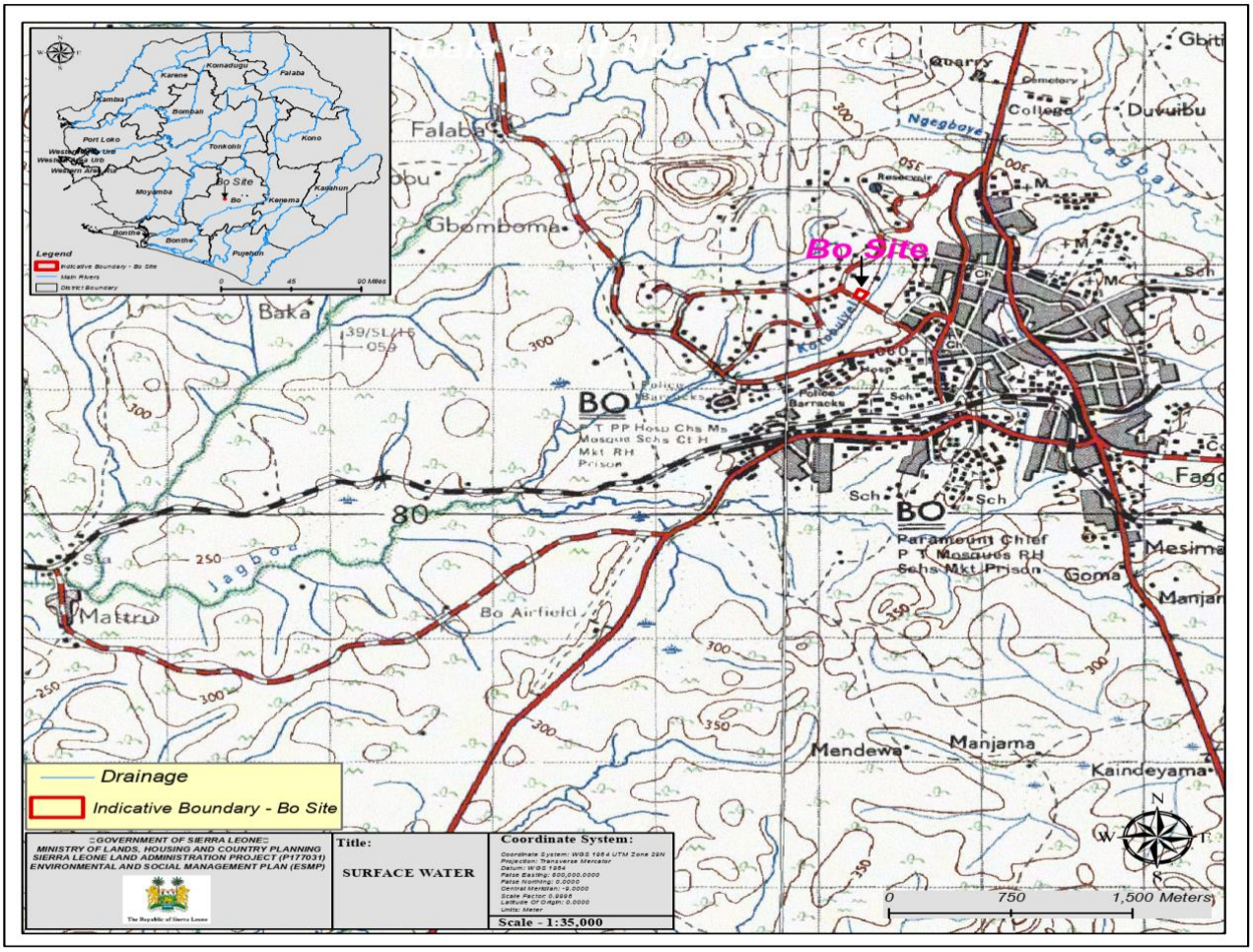

Figure 7: Hydrological Map of Proposed Construction Site and Surroundings

Due to the proximity of the Kotobuiyei stream to the Bo site, a water sample was collected to determine the water quality of the stream. The water sample was examined for physio-chemical, heavy metals and bacteriological parameters at the Sierra Leone National Water Laboratory.

The membrane-filtration technique was used to enumerate faecal indicator bacteria using the ***POTA –Lab kit*** and membrane Lauryl Sulphate broth. A ***DR/2800 HACH Spectrophotometer*** was used to test for concentrations of some dissolved chemicals, including iron, chromium, copper nitrate, etc., while portable water testing meters were used to ascertain the electrical conductivity, total dissolved solids, turbidity and pH of each water source.

The results from the surface quality monitoring are presented in Annex 3. Guidelines published by the World Health Organisation (WHO) and Sierra Leone Standards Bureau are utilised in the analysis.

The results show that the pH value is neutral, and that electrical conductivity, turbidity, and total dissolved solid values are within the SLSB standard for effluent. Chemical analysis indicates the presence of trace amounts of manganese, nitrate, nitrite, potassium, phosphate, silica, sulphite, iron, aluminium, arsenic, and chromium, with some parameters slightly exceeding WHO guidelines. Biological analysis shows no presence of *E. coli*, but the test reveals the presence of faecal coliforms and non-faecal coliforms, indicating faecal contamination.

*4.1.5.2 **Ground Water***

The country has a high level of yearly renewable water resources thanks to a concentrated network of rivers and large groundwater supplies. Around 80% of the country's rural residents' water demands are met by the country's network of watercourses, with groundwater providing a far smaller portion of the country's potable supply (Jimmy D.H. et al. (2012). Between 2016 and 2017, Hydro Nova (USA) conducted an extensive survey of hydrogeological data in Sierra Leone. The survey covered 28,900 wells from a national

survey, including wells in Bo City, revealing that most are situated in unconfined aquifers of three types: perched, porous, and fractured (Fileccia, A. (2018)).

The Bo proposed site is located near government offices and residential homes. These offices and homes rely on tap water and ground (well) water for domestic and drinking water use. During the collection of household socioeconomic data, a few hand-dug water wells were noted.

The potential for groundwater contamination from septic tanks, if not constructed properly, is one of the issues raised by the National Water Resources Agency. For this reason, it is recommended that groundwater assessment be undertaken if the well is found within 100 meters of the site and located at a lower elevation.

One hand-dug well was identified within a 100-meter radius of the proposed site and at a lower elevation than the site. This well was sampled to establish the groundwater quality of the surrounding aquifer especially with regards to faecal contamination.

The results (Annex 3) indicate that pH, electrical conductivity, turbidity, and total dissolved solid values are within the WHO drinking water standards. The chemical analysis observed trace amounts of manganese, nitrate, nitrite, potassium, phosphate, silica, sulphite, iron, aluminium, arsenic, and chromium, with some parameters exceeding WHO guidelines and SLSB standards namely fluoride and nitrates. Biological analysis shows no presence of *E. coli*, but the test reveals the presence of faecal coliforms, indicating faecal contamination of the surrounding groundwater.

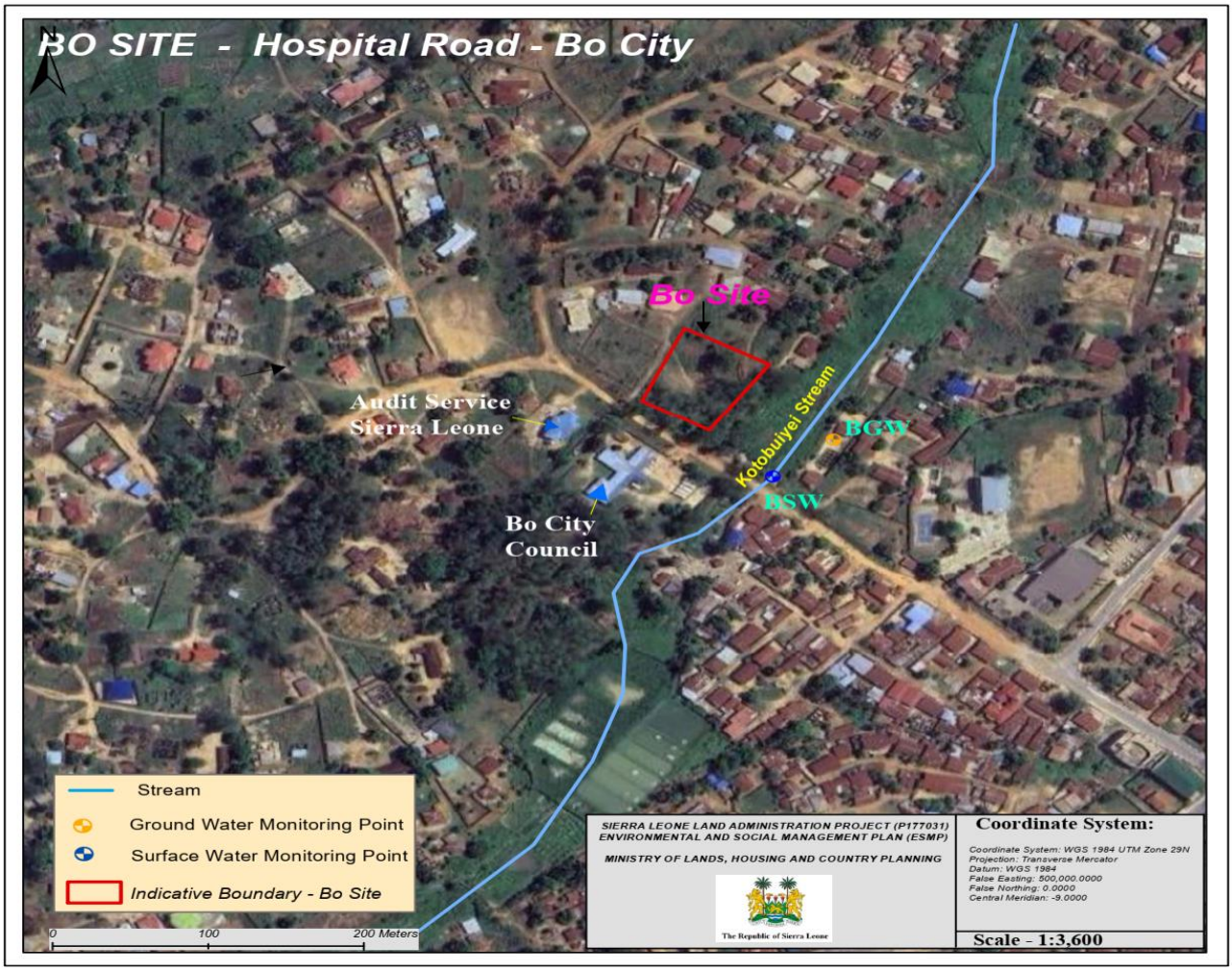

Figure 8: Surface and Groundwater Monitoring Points

Figure 9: Surface and Groundwater Sampling

4.1.6 Ecology

The Bo site and its immediate surroundings boast a diverse array of plant species, encompassing grasses, herbs, lianas, shrubs, palms, sedges, and trees (refer to Table 4 below and detailed breakdown in appendix 4). Notably, the dominant tree species on the site are the nine *Gmelina arborea* trees, renowned for their fast growth and timber utility in Sierra Leone. Despite their attractiveness to certain insects and birds, these trees do not significantly contribute to wildlife habitat, especially in this particular environment.

One vulnerable tree species, *Milicia regia*, tropical tree within the Moraceae family is present on the site. *Milicia regia* is a species of tropical tree in the family Moraceae. Its habitat spans the West African coast and in the high forest of Sierra Leone and threatened (Vulnerable) by habitat degradation and logging activities. Additionally, two palm species, *Elaeis guineensis* and *Cocos nucifera*, both from the Arecaceae family, are present on the site.

Various grasses, shrubs, and herbs also populate the area, with a semi-fenced cleared section on the west side containing patches of grass. The land's periphery features swamp cultivation along the Kotobuiyei stream, extending to the northeast, east, and southeast. Adjacent to the site are Hospital Road and the Bo City Council to the south.

According to a quick field examination and interviews with nearby residents, the Bo site is home to or is a movement path for animal species such as rodents like squirrels and rats, reptiles like lizards and snakes, and bird species like wild pigeons.

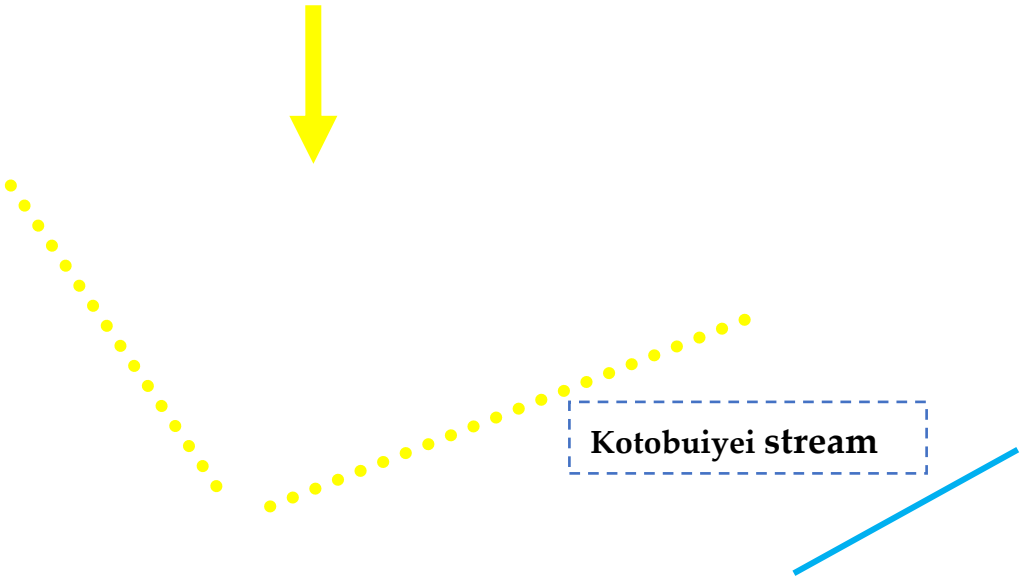

Figure 10: Ariel View of the Vegetation Cover at the Bo site

Figure 11: L - Front View of the Bo site showing the Gmelina Arborea trees; R - Bo site showing cleared space in between the Gmelina arborea trees

Figure 12: Full View of the Bo site showing cleared space in between the Gmelina Arborea

Table 4: Types of Plant species recorded in the Bo site and immediate environs

PLANT SPECIES	TOTAL
Grass	7
Herb	15
Shrub	3
Liana	2

Palm	2
Sedge	2
Tree	22

4.2 SOCIAL BASELINE

4.2.1 District / City level Socioeconomic Data

4.2.1.1 Demographics

According to the 2021 Midterm Population and Housing Census, Bo City has a population of 223,075 residents of which 46.8% are male and 53.7% females with an average household size of 4.2. Bo City accounts for 3% and 12.1% of the total population of Sierra Leone and that of the Southern Province respectively significantly contributing to the country's urbanization trend. This is characterized by an annual urbanization rate of 2.9% (Statistics Sierra Leone, 2022). The city is also one of the most densely populated in the country, with about 8,923 persons per square kilometres. Bo City is known for being multi-cultural. However, the Mendes represented over 60% of the district's population in 2014 while the remaining 40% is shared among various other ethnic groups notably, the Temne, Limba, Loko, Mandingo, Fula, and others as could be noted in the current demography. The city as with Sierra Leone in general, is extremely religiously tolerant with key faiths coexisting peacefully, Islam is predominant followed by Christianity and traditional beliefs (OCHA, 2015).

4.2.1.2 Economy & Livelihood

The economic landscape of Bo City is shaped by its status as a major urban hub. The city's economic activities encompass a wide range of sectors, including trade, services, and small-scale industries. Residents of Bo engage in various livelihoods, from formal employment opportunities within government institutions to informal sector activities like street vending and market trading. The city is dubbed the economic engine of the Southern Province, contributing about 7.4% of the national GDP (Stats SL, 2015).

4.2.1.3 Education

Bo City has the highest literacy and school enrolment rates in the Southern Province (table 4-11 below). The city has several educational institutions, ranging from pre-primary to tertiary level. It has the second oldest secondary school in the country, the Bo Government Secondary School, one of the most prestigious and renowned schools in the country, with other public and private secondary schools catering to the students' diverse needs and aspirations. The second largest university in the country is also situated in the city, i.e., the Njala University, which offers courses such as Agriculture, Education, Environmental Science, and Community Health. The city is also known for other tertiary institutions, such as the Bo Teachers College, the Bo School of Nursing, the Bo School of Midwifery, and the Sierra Leone Opportunities Industrialization Centre (SLOIC).

Table 5: Bo District Summary (Sierra Leone 2022 Annual Schools Census)

Bo	Total Schools	Government-Assisted	Private	Total Enrolment	Female %	Male %
	1,016	950	66	316,053	48.9	51.1
	Pupil-Teacher Ratio			Net Enrolment Rate		
Pre-Primary	Primary	Junior Secondary	Senior Secondary	Primary	Junior Secondary	Senior Secondary
381	421	331	241	76.4	59.8	35.4

Source: (GoSL, 2023)

4.2.1.4 Health and Food Security

Like in other Sierra Leonean towns, health services in Bo are provided through different facilities such as hospitals, clinics, and peripheral health centres. Bo Government Hospital is the country's third largest hospital in the country. It offers specialized and referral services like maternal and child health, immunization, family planning, malaria treatment, HIV testing, counselling, tuberculosis diagnosis, and

treatment. Other public and private health facilities in Bo include Holy Rosary Hospital, Mercy Hospital, Bo City Council Clinic, and Leprosy Control Centre. Many NGOs and partners support Bo's health sector, such as the World Health Organization, the International Medical Corps, the International Rescue Committee, and the Red Cross. Compared to rural areas which suffer from inadequate infrastructure, equipment, drugs, staffing, and funding deficits, Bo has a relatively well-developed healthcare sector.

Table 6: Bo District Health Facility Type Disaggregated

Bo	Hospitals	CHCs	CHPs	MCHPs	Total
	1	37	51	69	158

Source: (DHMT Bo, 2022)

Table 7: Child Health Indicators

Child Health Indicators	Percentage (%)	National Average (%)
Stunting	21.1	26.2
Underweight	7.6	11.0
Exclusive Breastfeeding	56.8	52.7
Minimum dietary diversity	22.9	22.9

Source: (SLNNS, 2021)

Table 8: Key Food Security Parameters

Food Security Parameters	**%**
Moderate-Severely Food Insecure Population (%)	80
Food Consumption Score (%)	16
Household Dietary Diversity (5 or Less food groups)	80.0
Reduced Coping Strategy Index (rCSi)	8.3

Source: (WFP, 2023)

4.2.1.5 WASH

Many cities in Sierra Leone lack adequate water supply and sanitation facilities for their residents. According to the Sierra Leone Water Point Mapping Project 2016, only 43% of the population had access to improved water sources, such as boreholes, hand pumps, protected wells, and piped water. The remaining 57% rely on unimproved water sources, such as unprotected wells, rivers, streams, and ponds. Additionally, only 28% of the population has access to improved sanitation facilities, such as flush toilets, ventilated improved pit latrines, and composting toilets. Most of the population uses unimproved sanitation facilities, such as pit latrines, bucket latrines, and open defecation.

4.2.1.6 Gender Based Violence (GBV)

Protocols for Gender-Based Violence (GBV) and Sexual Exploitation or Abuse (SEA) cases are considered in the project's Grievance Redress Mechanism (contained in the GBV Action Plan). Since GBV cases are very sensitive, the matter of who handles them should be paramount and discreet. There are different entry points to which the survivors can direct their complaints and be referred to the GBV service provider. To avoid stigmatization, rejection and reprisals against survivors of GBV, RAINBOW Initiative is working with PCU to coordinate GBV issues. It is not uncommon that stigmatization can encourage the culture of silence in survivors and therefore inhibit them from facing the entry-points set up for complaints.

In the handling of such matters the following should be considered:

- If a case is received by the identified entry points or the GRM, they shouldn't register any personal detail of the survivor that can compromise his/her anonymity or the case details and should refer the survivor to the service provider for proper care. The GRM will only

register the nature of the complaint and the extent to which the survivor knows if the perpetrator was project related.

- The survivor is expected to take an informed decision on the matter of being referred to any service, including the Family Support Unit (FSU) of the Police to place a report. The responsibility of the entry-points is to refer the survivor to the appropriate service provider and ultimately to the GRM if the survivor has agreed to do so for registration.

According to the 2019 Demographics and Health Survey, 61% of Women (15 – 49 years old) in Sierra Leone have been victims of gender-based violence in their lifetime and 43% had undergone GBV in the 12 months preceding the survey. Bo District has a higher level of lifetime GBV occurrence than the national average at 66.4% with 40.5% within the preceding 12 months.

4.2.2 Project Area Socioeconomic Data

Socio-demographic information on age, gender, education level, marital status, monthly income, and related factors provide valuable insights into the characteristics of stakeholders in the immediate surroundings of the proposed site. Twenty-Three (23) respondents were targeted.

4.2.2.1 Demographics

Table 9: Demographic Characteristics of Respondents

Category	Demographic Group	n	%
Sex of Respondents	Male	15	65.2
	Female	8	34.8
Age Category	15</= 25 years	6	26.1
	25>/= 45 years	9	39.1
	> 45 years	8	34.8
Religion	Islam	14	60.9
	Christianity	9	39.1
Duration of Stay in Project Location (years)	1-5	11	47.8
	6-10	8	34.8
	>10	4	17.4
Marital Status	Married/Cohabiting	14	60.9
	Widowed/Separated	2	8.7
	Single	7	30.4
Educational Level	No formal education	5	21.7
	Primary	8	34.8
	Secondary	7	30.4
	Tertiary	3	13
	Islamic	-	-
Types of Dwelling	Cement Flat	12	52.2
	Mud/'dirty block' House	11	47.8
	Others	-	-
Current Employment Status	Employed formal	3	13
	Employed informal	9	39.1
	Unemployed/retired	4	17.4
	Student	7	30.4
Average monthly earnings	<600	13	56.5
	600-2,500	4	17.4
	2,501-5,000	3	13
	5,001-7,200	2	8.7
	>7,200	1	4.3
Household Size	1-3	8	34.8
	4-5	10	43.5
	> 5	5	21.7
Vulnerable Family Member	Yes	6	26.1
	No	17	73.9

4.2.2.2 Gender, Age, Religion, Duration of Stay, Marital Status

From the field visit conducted and residents within the 200-300m radius from the Bo site boundary, a diverse demography of individuals were surveyed, 65% were male, and 35% were female. Age distribution amongst respondents includes 26% in the 15-25 age group, 39% in the >25 - 45 age group, and 35% in the > 45 years old respectively. Marital status shows that 30% were single, while 61% and 9% were married/cohabiting and widowed/separated respectively. In terms of religion, 61% of respondents identify as Muslims, whilst 39% as Christians.

4.2.2.3 Housing and Income

For the proposed SLLAP project's regional spaces to be constructed, the Bo site situated at the Reservation Avenue close to government pre or post-colonial quarters. Housing structures in the area showed a mix of old and new dwellings. Within the sample size, the majority 52% reside in cement flats/apartment buildings, and 48% live in mud houses with dirt blocks and zinc roofs.

Regarding employment and remuneration, monthly earnings for respondents interviewed stand as follows; 57% earn less than SLe 600, 17% earn between SLe 600 - 2,500, 13% earn between SLe 2,501 - 5,000, 9% between SLe 5,001 - 7,200 and 4% above SLe 7,200. Household sizes vary, with more than 60% having greater than 3 individuals living in the same household. Formally employed individuals constitute 13%, informally employed at 39, unemployed/retired 17% and students 30%.

4.2.2.4 Education and Employment

Educational status varied amongst respondents with 21% of respondents having no formal education. Primary and secondary education marks at 35% and 30% respectively, whilst tertiary education is accounted for by only 13%.

4.2.2.5 Health, Water and Sanitation Issues

Table 10: Health, Water and Sanitation Issues of Respondents

Category	Group	n	%
Sources of Drinking Water	Pipe borne water	5	21.7
	Sachet	6	26.1
	Well	12	52.2
	Others (stream, river, rain)		-
Experience of health-related problems from drinking sources	Yes	4	17.4
	No	19	82.6
Access to toilet facilities	Yes	16	69.6
	No	7	30.4
Waste Disposal Methods	Landfill/Burying in Pits	10	43.5
	Burning	6	26.1
	Composting	2	8.7
	Paying waste collectors	5	21.7

4.2.2.6 Health

Health concerns reported by respondents include common illnesses like malaria 70%, typhoid 50%, cold/flu 60%, headache 30%, stomach-ache 20%, and ulcer 10%. Upon enquiries related to the status of drinking water some respondents 17% admitted to experiencing health-related issues due to the water they drank, including diarrhoea. The main sources of drinking water include wells, tap water, and sachet water.

4.2.2.7 Sanitation

Sanitation practices differ among respondents, however 70% recorded access to some form of toilet facility. Most notably, waste disposal methods mentioned by respondents included 26%, burning and burying in pit/landfilling 44%, 9% composting and 22% paying waste collectors to dispose on behalf of their households.

4.2.2.8 Water Sources

Different sources of drinking were observed in the location for both drinking and domestic use. Majority, 52% used wells as their main source, followed by sachet and pipe borne water at 26% and 21% respectively.

4.2.2.9 Perceptions of the SLLAP Project

The overall impression from respondents is of optimism (with over 90% viewing it as a good initiative. While the SLLAP project is viewed positively as a developmental venture with the potential to address land issues, there are genuine fears regarding potential negative impacts (fears related to noise and air pollution were expressed by 60% of respondents) on the community. Despite these concerns expressed, respondents communicated their willingness to endure inconveniences for the sake of development and emphasize the need for careful consideration of environmental recommendations.

5 IMPACT ASSESSMENT

This section discusses the positive and negative impact of the interventions on the natural environment, society and the workforce during the pre-construction, construction, decommission and operational phases of the proposed administrative building construction for NLC.

5.1 PROJECT AREA OF INFLUENCE

The area of influence of the proposed office building construction was assessed in terms of its area of influence across various dimensions:

Physical Environmental

The proposed project may impact various environmental components such as soil, water, air quality, and to a very limited extent, biodiversity.

Geographical Area

The proposed project's immediate geographical area of influence spans a 100-meter buffer around the proposed site boundary. The entities covered under this include locations such as the Bo City Council office, the Audit Service Sierra Leone, the access road leading to the site, Hospital Road, residential areas (Government Quarters and Private Residences), and the Kotobuiyei stream/swamp. Furthermore, it also includes the access route to the site used by construction vehicles.

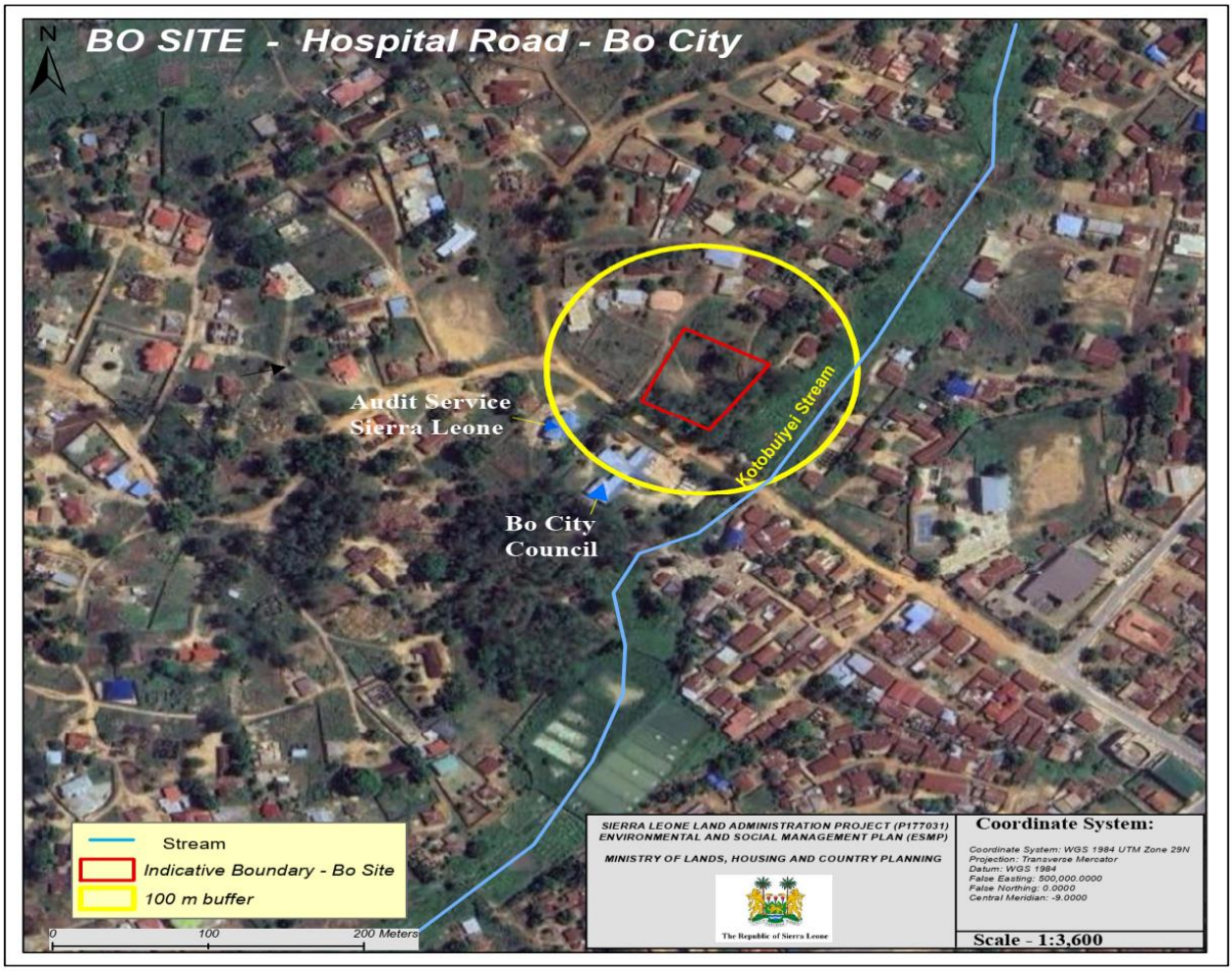

Figure 13: Project Area of Influence

Community and Vulnerable Persons

Assessing the potential effects on the community, including any impact on vulnerable individuals. Individuals who are vulnerable encompass a broad range and are not restricted to, but may include:

- Persons living with disability
- Children
- Women
- Elderly

Institutional

The following are major institutions involved with or having influence on the proposed construction project:

- Ministry of Land, Housing and Country Planning

- Bo City Council

- Bo District Council

- Ministry of Works and Public Assets

- The Environmental Protection Agency- Sierra Leone

- The Ministry of Environment and Climate Change

5.2 IDENTIFICATION AND EVALUATION OF POTENTIAL IMPACTS

This section focuses on impact identification, effects on some receptors, and significance assessment. The impact assessment covers the pre-construction, construction, decommission, and operational phases. The impacts were identified and evaluated based on stakeholder consultations, site visits/observations, preliminary project descriptions and designs, literature reviews, qualitative and quantitative data, and expert knowledge.

The significance of potential impacts that may result from the proposed office construction were determined to assist in preparing mitigation measures to guide the implementation of the recommendations from this report. The methodology is discussed below to evaluate the significance of this project's potential impacts.

Table 11presents the coding for measuring potential Impact significance. A colour matrix is used to identify the interaction between the project activities and the environmental and social characteristics. The colours indicate impact severity, such as magnitude, extent, etc. The impact's significance is assessed through professional judgment of the magnitude of the impact and the receptor sensitivity and value. The severity of the effects can be high, moderate, low, or slight, depending on the activity and receptor involved.

Table 11: Code for Indicating Potential Impact Significance

Potential Impact	Significant	Colour coding
Adverse	Slight	
	Low	
	Moderate	
	High	
Positive		

- **High**: An impact of high significance is one where an accepted limit or standard may be exceeded, or large magnitude impacts occur to highly valued resources. The impact is very strong and cannot easily be reduced.
- **Moderate**: an impact is described as moderate when it is within the accepted limits and standards. The impact on the environment is substantial but can be reduced through specific mitigation measures.
- **Low**: An impact is low when the magnitude is sufficiently small and well within accepted standards and the receptor is of low sensitivity. The impact on the environment is significant but subdued and may or may not require the application of mitigation measures.
- **Slight**: An impact is slight when its effect on the natural environment and the community resulting from a specific activity, project, or development is minimal or negligible.

5.3 POSITIVE IMPACTS

No	Project Activity	Positive Potential Impact	Key Receptor (s)	Significance
CONSTRUCTION AND OPERATION PHASE				
	Construction and Operation of the administrative building for the NLC headquarters in Bo City.	The project will positively impact the environment in the long term by promoting sustainable land use practices and reducing environmental degradation. A permanent and conducive environment for the Commission to carry out its mandate effectively in the region of Sierra Leone. The project will also contribute to the country's socio-economic development by providing temporary employment opportunities during construction, including opportunities for food vendors to sell to workers and permanent employment creation during operation.	The NLC, residents of the Southern Province of Sierra Leone, residents near the site, local food vendors, Southern Province ecosystem.	
	Landscaping and Site restoration	❖ Landscaping activities such as planting trees, shrubs, and flowers create a beautiful and welcoming environment while providing a habitat for birds and other animals. The aesthetics of the surrounding area can be enhanced, creating an inviting space for everyone. ❖ Site restoration activities such as reseeding grass, removing temporary structures, and restoring the surrounding area's natural features can help reduce soil erosion, improve air quality, and mitigate the negative impact of construction on the environment. ❖ Employment opportunities are provided during the restoration process.	Nearby residents, Bo Township	

5.4 NEGATIVE IMPACTS

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
PRECONSTRUCTION PHASE					
1	Setting out of construction site, vegetation removal, hoarding of the site to protect the public from potential risks, such as construction debris and heavy machinery, and setting out (positioning) of site office, store/materials yard and equipment.	The workforce not aware of the environmental and social safeguards requirements for office building and associated infrastructure construction work.	Non-compliance with ESMP	Contractor, construction staff, community members and the environment	High
		Loss of vegetation [trees (9 big *Gmelina arborea* trees, 4 small *Gmelina arborea* trees, one *Milicia regia* (iroko) and 5 Acacia trees) and elephant grasses, etc.)]	Loss of biodiversity of the area, including loss or displacement of habitats and food sources for fauna such as birds, insects and small mammals, including movement corridor. Loss of already vulnerable Iroko tree (Milicia Regia)	Local Flora, Fauna	Moderate
			Tree loss reduces carbon sequestration capacity, contributing to increased greenhouse gases in the atmosphere.	Climate Change	Low
			Increased temperature can have an impact on the local microclimate.	Temperature	Low
			Contribute to the decrease in air quality in the area and surrounding areas as trees help improve air quality by absorbing pollutants (such as carbon dioxide, sulphur dioxide, and nitrogen dioxide) and releasing oxygen through photosynthesis.	Public Health for Workers at the construction site, and at the offices/institution close to the site	Low

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
				- Nearby Residents. Local ecosystems	
			The area will lose the aesthetic value the trees provided.	Nearby Resident, and General Public	Low
		Air Quality Deterioration	Dust, particulate matter, and emission generation from site preparation using machinery can affect air quality, causing respiratory issues in nearby surroundings.	Site Workforce, Nearby Resident, and Wider Community	Low
		Noise Pollution	During the use of chainsaws and other machinery operations, the neighbourhood may experience a noticeable disturbance due to the temporary increase in noise levels.	Nearby Resident, and Wider Community	Low
		Wastes Accumulation on Site	Cutting down trees and removing other vegetation can generate bulk waste that may have a significant impact on the environment if not disposed of properly. ❖ Accumulation of waste on-site can result in poor aesthetics. ❖ Haphazard disposal or stacking of trees cut down for later disposal can pose a risk to occupational and public safety.	Site Workforce, Nearby Resident, and Wider Community	Moderate
		Soil, pollution, disturbance and erosion	❖ The loss of topsoil can impact the future horticulture of the site by affecting soil quality. ❖ Accidental release of hydrocarbons or chemicals from machinery use can result in soil contamination. ❖ During heavy downpours of rain, exposed soil can erode into the Kotobuiyei stream.	Future Horticulture Area, Kotobuiyei stream ecosystem, and Soil quality, and Local	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
				Environment and Ecosystems	
		Water Pollution	Accidental oil or chemical spills during heavy machinery use can contaminate the Kotobuiyei stream, when washing off by heavy rain. Eroded material from site can also migrate into the stream during heavy rains	Kotobuiyei stream ecosystem	Moderate
		Visual Impact	Disruption of local aesthetics during fence, office, store and machinery installation.	Nearby Resident, Office/Institution, and Wider Community	Low
		Occupational health and safety of workforce	❖ Injuries to workers during the use of chainsaw and heavy machinery use for construction site setup, vegetation removal, and equipment positioning. ❖ Temporary high noise from the chainsaws and other machinery can impact workers' hearing and well-being. ❖ Lack of relevant Personal Protective Equipment (PPE's) will increase the risk of worker's exposure to construction hazards ❖ Temporary dust, particulate matter, and emission generation from site preparation using machinery can affect air quality, causing respiratory issues for workers. ❖ Haphazard stacking of fallen trees pose dangers to workers. ❖ Injuries resulting from unsafe working conditions and procedures, such as trips, slips, or falls including human error of the workforce. ❖ Occurrence of unforeseen accident in the work place due to urgency of the work and workers not paying attention to standard operating procedure (SOPs). ❖ Lack of safe drinking water and sanitation facilities create unhygienic conditions and transmission of diseases in the site and nearby resident	Site Workforce	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
		Community health and Safety	❖ Injuries to nearby residents and road users near the construction site due to heavy machinery use. ❖ Disturbance and discomfort in the surrounding community due to intermittent high noise levels during machinery operation. ❖ Temporary dust, particulate matter, and emission generation from site preparation can affect air quality, causing respiratory issues for nearby residents. ❖ Haphazard stacking and disposal of fallen trees can harm nearby resident and the public.	Nearby Residents and Wider Community	Moderate
	CONSTRUCTION PHASE				
1	Clearance of the remaining vegetation within the project site for the footprint of the design main layout, and associate facilitate.	Loss of Biodiversity	Loss or displacement of habitats or movement corridor for fauna such as insects and small mammals.	Fauna	Low
			Loss of vegetation and small mammals on the site.	Flora, Fauna	Moderate
		Air Quality Deterioration	Vegetation Clearance can lead to temporary air quality deterioration due to the release of dust, particulate matter, and emissions from machinery, leading to; • Respiratory problems for construction workers, nearby residents and nearby offices. • Adverse effects on the surrounding vegetation and nearby swamp ecosystem, causing damage to the flora and fauna residing in the area.	Local fauna and Flora, Nearby Residents, Site Workforce	Moderate
		Noise Pollution	Intermittent high noise from heavy machinery operations.	Local fauna, Nearby Residents, Site Workforce	Low
		Soil pollution, disturbance and erosion	❖ Expose soil is susceptible to erosion during heavy down pour of rain which could enter into Kotobuiyei stream. ❖ Soil contamination due to accidental release of hydrocarbons or chemicals from machinery usage.	Kotobuiyei stream	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			❖ Loss of topsoil may affect the quality of soil for future horticulture in the area.	ecosystem, and Soil Environment	
		Water Pollution	❖ Washing off accidental oil/chemical spills during heavy machinery use can lead to contamination of the Kotobuiyei stream. ❖ Erosion of soil leading to Kotobuiyei stream sedimentation during heavy rains. Hence, this leads to degradation of the quality of Kotobuiyei stream	Kotobuiyei stream ecosystem, Soil Quality	Moderate
		Wastes Accumulation and pollution on Site	❖ Improper disposal of cleared vegetation can lead to contamination of Soil. ❖ Accumulation of workers' leftover food, food wrappers, water bottle/sachet, fruit piles, and other debris.) on-site can contribute to: • pollution and create a breeding ground for pests, which can then spread disease. This can also lead to deterioration of the air and pollute Kotobuiyei stream quality if washed into it by rain. • unpleasant working environment for the workforce. • hazard for workers who may slip or trip on debris. ❖ Poor aesthetics arising from wastes accumulation due to improper waste management and disposal.	Nearby Residents, Site Workforce, Kotobuiyei stream ecosystem, Soil Quality, and Aesthetics	Moderate
		Occupational Health and Safety	❖ Improperly stacking fallen trees can be dangerous if placed haphazardly on the site. ❖ Lack of relevant Personal Protective Equipment (PPE's) will increase the risk of worker's exposure to construction hazards ❖ Workers may be at risk of accidents from heavy machinery use such as bulldozer, excavator, and chainsaw. ❖ Workers may be at risk of injuries from cuts or wounds from handling sharp tools and equipment or from falling branches. ❖ Injuries resulting from unsafe working conditions and procedures, such as trips, slips, or falls including human error of the workforce.	Site Workforce, and Visitors	High

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			❖ Intermittent exposure to high levels of noise during machinery operation. ❖ Clearing vegetation using machinery can generate dust, particulate matter, and emissions that can temporarily affect air quality. This can cause respiratory issues for workers. ❖ Haphazard waste accumulation on site could pose hazard for workers who may slip or trip on debris.		
		Community Health and Safety	❖ Improperly stacking fallen trees can be dangerous for nearby resident, particularly if the trees are placed haphazardly on or near access roads. ❖ Clearing vegetation can temporarily affect air quality, causing respiratory issues for nearby residents and offices. ❖ Disturbance and discomfort in the surrounding neighbourhood due to high noise levels during heavy machinery operation. ❖ Improper hoarding / securing of site allowing community access construction area and exposing them to hazards that they are not trained to handle.	Nearby Residents, passers-by, Visitors, and Wider Community	High
2	Clearing of topsoil, excavation subsoil works, levelling and other ground works	Aquatic Ecosystem	Erosion of excavated stockpile of top and subsoil into the Kotobuiyei stream can harm aquatic ecosystems.	Aquatic flora and fauna, Water Quality, Sediment transport, benthic organisms	Moderate
		Air Quality Deterioration	❖ The use of heavy machinery for land clearing and excavation can lead to poor air quality by causing soil to become airborne, resulting in the creation of dust and particulate matter, especially during dry and windy weather. Also, dust particles can be blown from the site through winds. ❖ Emission of pollutants from heavy machinery used.	Nearby Residents and Offices, Site Workforce	Low

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
		Noise Pollution	❖ Intermittent increased noise and vibration levels due to heavy machinery and equipment use, can disturb nearby resident.	Nearby Residents and Offices, Site Workforce	Low
		Water Pollution	❖ Removal of top and sub soil exposes the land to erosion, leading to Kotobuiyei stream sedimentation in during heavy rains. Hence, this leads to degradation of the quality of Kotobuiyei stream ❖ Sediment run-off, oil/chemical spills during excavation and levelling, especially during heavy rain, can contaminate the Kotobuiyei stream and groundwater.		Moderate
		Soil pollution, disturbance and erosion	❖ Potential soil contamination due to use Oil/Chemical spill from machinery use. ❖ Removal of topsoil can increase the vulnerability of the site to soil erosion. ❖ Expose and loosen soil will be susceptible to erosion if not control during heavy rain down pour into Kotobuiyei stream. ❖ Soil contamination due to accidental release of hydrocarbons or chemicals from machinery. ❖ Loss of topsoil may affect the quality of soil for future horticulture in the area.	Nearby Residents and Offices, Workers at the construction site, and adjacent swamp (cultivated vegetable and Kotobuiyei stream ecology)	Moderate
		Waste accumulation and pollution on site.	❖ Waste accumulation on site as a result of poor housekeeping and waste pollution at the site. ❖ Improper disposal of rocks, stones and sub-soil can lead to soil contamination. ❖ Improper management of accumulated waste (including workers leftover food, food wrappers, water bottle/sachet, fruit piles, and other debris.) can result in soil and water pollution. ❖ Poor aesthetics arise from wastes generated and accumulated.	Nearby Residents, offices, and Workers at the construction site	Moderate
		Occupational Health and Safety	❖ Improperly stacking subsoil, rocks, and stones haphazardly can be hazardous to workers.	Workers at the construction site	High

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			❖ Injuries to workers during the use of heavy machinery for excavation work, construction site setup, vegetation removal, and equipment positioning. ❖ Intermittent exposure to high levels of noise during machinery operation. ❖ Dust and pollutants from land clearing excavation and stack excavated materials can temporarily affect air quality during the dry and windy condition, causing respiratory issues for workers. ❖ Open excavated trenches pose a threat to workers in the project site.		
		Community Health and Safety	❖ Improperly stacking subsoil and rocks by the side fence or near access road could pose risk to nearby resident and offices. ❖ Intermittent exposure to high levels of noise during machinery operation. ❖ Dust and pollutants from excavation work and excavated material can temporarily affect air quality, causing respiratory issues for nearby residents and offices. ❖ Contamination of the Kotobuiyei stream due to sedimentation caused erosion from the site, affecting water use by downstream users. ❖ Open excavated trenches pose a threat to animal and nearby resident if site is not properly fenced.	Nearby residents and offices	High
3	Material Sourcing	Material acquisition for construction activities may result to depletion of natural resources such as sand, aggregate, and wood.	Materials such as sand, stones, water, and wood if sourced from unauthorised or illegal sources may disrupt natural environment.	Ecosystem of the area and surrounding, and Public Health and Safety	Moderate
4	Laying the foundation, block work, and	Air Quality Deterioration	❖ Impaired Air quality that affects the site and surroundings due to dust, particulate matter, and emission generation from delivery vehicles/trucks, materials unloading including aggregates and	Nearby Residents and Offices, Site Workforce	Low

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
	finishing works such as joinery, glazing, wall and floor finishes, and installation of furniture and equipment.		cement, use of concrete mixer using a batch plant, and other machinery and equipment used in the site. ❖ Dust generation along unpaved delivery routes.		
		Noise Pollution	Construction activities involving use of power tools and equipment, and other machinery use can potentially create intermittently high levels of noise that may cause disturbance to workers, nearby residents, and offices.	Nearby Residents and Offices, Site Workforce	Low
		Water Pollution	❖ The wastewater runoff produced during construction work has the potential to contain pollutants, including sediment, accidental oil, and chemical spills from machinery usage, greywater and blackwater which may lead to contamination of the: ▪ Kotobuiyei stream, and ▪ Groundwater ❖ Workers leftover food, food wrappers, water bottle/sachet, fruit piles, and other debris.) on site which can result in water pollution by carrying pollutants into Kotobuiyei stream.	Kotobuiyei stream ecosystem and Ground water quality	Moderate
		Waste accumulation and pollution on site.	❖ Excavated materials are likely to form bulk of waste on site, which if not properly managed could result in poor housekeeping and waste pollution. ❖ Removal of vegetation, cement papers, food wrappers, used sachet water plastics and domestic refuse from food vendors who may be selling on the site will generate a lot of waste which could result to soil and water pollution. ❖ Construction debris, packaging materials, and hazardous waste which could result to soil and water pollution. ❖ Poor aesthetics arising from wastes generated and the unpleasant odour it produces.	Nearby Residents, offices, and Site Workforce	Moderate
		Soil Contamination	Potential soil contamination due to one of the following; i. improper use of hazardous chemicals and materials; ii. improper disposal of waste; iii. accidental oil and chemical spills or leaks.	Ground Water, Soil Quality, Kotobuiyei stream ecosystem	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
		Occupational Health and safety risks	❖ Exposure to cement dust, emissions from paints, thinners and pesticides for treating wood and other solvents pose health risk to workers. ❖ Decrease the ambient air quality by releasing dust, particulate matter, and emissions from construction activities, which puts workers on site at the risk of developing respiratory tract diseases. ❖ Exposure of workers to hazardous dust, fumes, and other substances during construction activities. ❖ Intermittent exposure to high level of noise during truck, equipment and other machinery use on site. ❖ Injuries of workforce on site resulting from accident, unsafe working conditions and procedures; such as trips, slips, or falls from heights, handling heavy machinery and materials, working in confined spaces. ❖ Use of flammable materials, machinery, and equipment can pose a risk of fire if not properly managed. ❖ Potential strain injuries from the handling of equipment, tools, and materials.	Site Workforce, Nearby Residents, offices, and wider community	High
		Community Health and Safety risks	❖ Delivery vehicles and trucks can reduce the ambient air quality for nearby residents which puts them at an increased risk of respiratory tract diseases. ❖ Noise pollution from heavy machinery and equipment, which could have an impact on the health and wellbeing nearby residents ❖ Exposure of nearby residents to hazardous dust, fumes, and other substances during construction activities. ❖ Temporary traffic congestion caused by the movement of construction vehicles and trucks, which obstruct the free movement as well as pose risk to nearby residents and personnel working in nearby offices. ❖ Risk of accident along the road route use by construction light and heavy vehicles.	Nearby Residents, offices, and Site Workforce, and wider community	High

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			❖ Contamination of the Kotobuiyei stream due to erosion of accidental oil and chemical spill from the site, affecting water use by downstream users.		
5	External works - This includes landscaping (i.e. planting trees, shrubs, and flowers for visual appeal), parking lots, sidewalks, and the installation of outdoor lighting to enhances safety and security.	Noise Pollution	External works including landscaping may involve the use of heavy machinery and power equipment that can create intermittent loud noises that may disturb nearby residents or workers.	Nearby Residents, offices, and Site Workforce, and wider community	Moderate
		Air Quality Deterioration	❖ The movement of soil and excavation work can create dust and particulate matter that may become airborne, potentially causing respiratory issues for workers or nearby residents. ❖ Dust generation from materials unloading, including aggregates and cement, concrete mixer using a batch plant. ❖ Emission of pollution if heavy machinery is used. ❖ The use of heavy machinery contributes to the deterioration of air quality due to emission.	Nearby Residents, offices, and Site Workforce, and wider community	Moderate
		Waste, Soil and Water Pollution	❖ Waste concrete, cement papers, food wrappers, used sachet water plastics and domestic refuse from food vendors who may be selling in the site or just outside the site will generate a lot of waste which could result to soil pollution, and if wash off to the Kotobuiyei stream will result to water pollution thereby affecting the aquatic ecosystem. ❖ Improper disposal of excess fertilizers or chemicals used in landscaping can lead to water pollution if they wash off into Kotobuiyei stream. ❖ Poor aesthetics arising from wastes generated and the unpleasant odour.	Nearby Residents, offices, and Site Workforce, and wider community	Moderate
		Visual dis amenity	The aesthetic of the surrounding area can be negatively impacted if the changes made to the landscape is not pleasing to the neighbourhood.	Nearby Residents, offices and wider community	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
		Occupational Health and safety risks	❖ Construction activities, including external works, can cause intermittent increased noise and dust pollution, which can have a negative impact on the well-being of workers. ❖ Injuries resulting from unsafe working conditions and procedures, such as trips, slips, or falls including human error of the workforce. ❖ Landscape workers may be exposed to hazardous chemicals such as pesticides, herbicides, and fertilizers if used, which can cause skin irritation, respiratory problems, and other health issues.	Site Workforce, and visitors	High
		Community Health and Safety risks	❖ External works cause intermittent high noise, and air quality deterioration due to dust pollution, which can have a negative impact on the well-being of the neighbourhood. ❖ Community members accessing construction site and getting injured ❖ Erosion of accidental oil and chemical spills into the Kotobuiyei stream during heavy down pour of rain.	Nearby Residents, offices, and wider community	High
6	All construction Work	Labour Influx to the neighbourhood	❖ Influx of workers from outside the community/Bo Township could be a potential source of social tension due to desire of the community/Township to secure employment for the youth. ❖ Potential for migrant workers to engage in sexual activities in the community could lead to transmission of STDs, sexual harassment, sexual exploitation, Gender based Violence (GBV), etc.	Nearby Resident and Wider Community	Moderate
		Labour and Working Conditions	❖ Workers may be paid rates below the stipulated national minimum wage or may be working under poor service conditions without contracts. ❖ Occurrence of unforeseen accident in the work place due to urgency of the work. ❖ Unfair and discrimination in the recruitment process especially against women and people living with HIV and AIDS. ❖ Unreported discrimination against persons living with disability within the workforce.	Contractor, Workforce, Vulnerable groups (Women and person living with HIV/AIDS)	High

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			❖ Violation of human rights of workers.		
		Child and Forced Labour	Children and minors could be employed directly or indirectly for the construction work, raising ethical and legal concerns.	Site Workforce and Children	Moderate
		Theft, Crime and Conflict	Theft and pilfering of construction materials by site workers, alongside other crimes like illicit affairs and drunk driving, contribute to criminal activities. Conflicts may arise from accidents or property damage caused by the contractor's workforce, equipment, or vehicles.	Contractor, PCU -SLLAP, Site Workforce, Nearby Communities, and Wider Community	Moderate
		Gender Based Violence risks	❖ Female workers whether they are directly involved in administrative tasks or engaged in manual labour can be vulnerable to sexual exploitation and sexual harassment from their male counterparts or supervisors thereby creating a hostile work environment that compromises their safety, well-being, and ability to perform their jobs effectively. ❖ Women and girls engage in selling food, water, or other goods at the site or nearby are at risk of sexual exploitation and harassment. ❖ Women, girls and children living around project sites are at risk for different forms of gender-based violence.	Site Workforce, Nearby Residents, and offices	High
		Spread of STDs	Potential for workers to engage in unprotected sexual activities in the neighbourhood could lead to transmission of sexually transmitted infections (STIs) and sexually transmitted diseases (STDs) such as HIV/AIDS, herpes, gonorrhoea, etc.		Moderate
		Sexual harassment and Sexual exploitation	❖ Inappropriate behaviour such as unwanted advances, comments, gestures, or other types of verbal, non-verbal, or physical conduct of a sexual nature from both co-workers and supervisors. ❖ Employment decisions or benefits explicitly or implicitly tied to an individual's submission to unwelcome sexual advances	Site Workforce, Nearby Residents, offices	High

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
				and Wider Community	
		Poor Sanitation	Poor sanitation on site can lead to the transmission of diseases and can have a negative impact on the well-being of nearby residents.	Residents, site workforce	Moderate
		Grievance and conflicts	Grievances and conflicts on site may disrupt work activities that could ultimately lead to project delays.	Contractor, PCU -SLLAP, Site Workforce, Nearby Communities, and Wider Community	Moderate
	DECOMMISSIONING PHASE				
	Removing construction equipment, disposing of construction spoil and waste, and dismantling temporary store.	Noise and Air Quality Pollution	❖ The dismantling process can create intermittent increased noise and disruption for nearby residents ❖ Temporary impair air quality due to dust, particulate matter, and emission generation from light and heavy vehicle use.	Nearby Resident, Site Workforce Wider Community	Moderate
		Soil and Water Pollution	Accidental release of fluid such as oil or hydraulic from machinery and equipment removal from the site can contaminate soil and Kotobuiyei stream if washed off during heavy down pour of rain and or percolate into the underground water table.	Nearby Resident, Wider Community	Moderate
		Waste pollution	❖ During construction, various materials such as concrete, wood, plastics, etc. are generated as waste. If not disposed of properly, these materials can have detrimental effects on the environment, including soil and water pollution. ❖ The accumulation of construction waste materials can lead to poor aesthetics around the construction site.	Nearby Resident, Offices, and Wider Community	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
		Job loss	During decommissioning, Loss of job and income for temporary workers will occur.	Site Workforce, Wider Community	Moderate
	OPERATIONAL PHASE				
	Use of the constructed NLC office complex in Bo Township	Unsafe Consequence along parking lots and side walk	❖ Poorly designed parking lots, sidewalks, and outdoor lighting can be hazardous to pedestrians and drivers. ❖ Cracked or uneven sidewalks can cause people to trip and fall, while poorly designed parking lots can increase the risk of accidents and collisions.	Pedestrians, Drivers, Person with Disabilities, Employees/staff	Moderate
		Water Pollution	Pollution arising from wash off of excess fertilizers or chemicals used from the landscape area into Kotobuiyei stream.	Kotobuiyei stream quality, Aquatic Ecosystems of the	Moderate
		Excess Water Usage	Watering of newly-planted trees and shrubs as part of the landscaping can result to increased water usage.	Water source use	Moderate
		Light Pollution	Installation of outdoor lighting may cause light pollution, which can disrupt the sleep patterns of people living nearby.	Nearby Resident,	Moderate
		Soil Erosion	Changes to the landscape can disrupt the natural balance, contributing to soil erosion from the landscape area.	Soil resource and quality, and Kotobuiyei stream ecosystem	Moderate
		Universal Access	Limited access to the NLC complex in Bo Township for persons disabilities.	Persons with disabilities	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
		Traffic Obstruction	NLC staff vehicles and public vehicle accessing the office could hinder traffic.	NLC office Occupant, Nearby Residents, Wider Community	Moderate
		Fire Hazards	Poor cabling works and lack of fire furniture i.e., smoke detectors, fire extinguishers	NLC office Workers, Nearby Residents, Wider Community	High

6 ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN

6.1 ENVIRONMENTAL AND SOCIAL MITIGATION MEASURES

6.1.1 Introduction

This section outlines a set of measures and actions which aims to minimise any potential adverse environmental and social impacts to acceptable levels, in line with the mitigation hierarchy.

6.1.2 Land Use

The construction site of the NLC office located in Bo Township currently consists of nine large *Gmelina arborea* trees, four small *Gmelina arborea* trees, one *Milicia regia* and five *Acacia* trees, along with elephant grasses and an empty space. The site has the potential to be used for agriculture or recreation. Some of the trees will be maintained at the site and the contractors will include provisions in their C-ESMP for the preservation of some of the trees. Two individuals cultivated a few mounds of seasonal crops just within the boundary of the site. They have been engaged and allowed to harvest their seasonal crops; and informed that the site is no longer available for cultivation as per provisions in the resettlement policy framework of the project and the site has now been taken over by the project with pillars erected, and signage installed.. Land use changes for the proposed office building and infrastructure construction will include incorporating landscaping with trees, shrubs, grasses, and flowers.

To mitigate the impact of land use change, several measures should be implemented. These include:

- Implementing suitable erosion control measures to minimize soil erosion and sedimentation;
- Implementing storm water management strategies to manage storm water runoff in the facility;
- Planting new trees and vegetation in other areas of the NLC facility to replace those that were removed; and
- Implementing sustainable building practices to reduce the environmental impact of the construction project.
- The gardeners have been engaged on several occasions and allowed to harvest their seasonal crops (cassava and potato leaves) in compliance with the disclosed RPF. The site was used during the rainy season when the gardeners move away from the inland valley swamps. The lands are usually left to idle during the dry season.

6.1.3 Air Quality

- Reducing vehicle idling time is an effective approach to decrease fuel consumption and emissions. This can be accomplished by turning off the engine while waiting at a loading or unloading point or while parked.
- Proper tuning and maintenance of machinery and equipment can also help reduce emissions.
- Truck drivers should be made aware of the need to avoid unnecessary engine racing at loading/unloading points and parking areas and to switch off or keep vehicle engines off at these points.
- Limiting unnecessary machinery and vehicular presence onsite can reduce emissions and dust generation.
- Speed controls should be enforced to prevent unnecessary dust generation on site and on the unpaved roads during transit to and from the site.
- High-level equipment maintenance should also be implemented to reduce emissions.
- Excavation should be avoided in extremely dry and windy weather to prevent dust generation.

- Workers should wear Personal Protective Equipment (PPE) to prevent them from exposure to dust and other harmful substances.
- Regularly measure air quality and investigate complaints to identify potential sources of emissions and dust generation.

6.1.4 Noise

- Drivers and construction machinery operators should be trained to turn off their engines when not in use to minimise noise.
- Excessive noise in sensitive areas should be avoided, and construction machinery should be maintained in good condition to reduce noise and vibrations.
- Noisy construction work should be scheduled during the day when neighbours are less likely to be affected.
- Machinery should be equipped with exhaust mufflers or silencers to minimise noise generation.
- Drivers should also be trained to avoid unnecessary engine noise in sensitive areas.
- Nearby residents and offices should be given advance notice of any unavoidable noisy activities to minimise disruption to their daily activities.

6.1.5 Flora and Fauna

- It is essential to restrict tree and grass clearing to the construction layout to protect the natural environment.
- Using fire for vegetation removal should be prohibited, and cut/cleared vegetation shouldn't be burned.
- Workers should be encouraged to refrain from removing vegetation from adjacent areas.
- Grasses and bushes within the site but outside the construction layout should be conserved to protect pollinators, birds, and small mammals.
- Implement landscaping work, including planting trees and flowers, to enhance biodiversity. It is also essential to mitigate potential road kills by enforcing speed limits (30km/hour at night, 40km/hour during the day).
- Workers should be trained on proper procedures for handling snakes found on the site.
- Educate workers on the importance of biodiversity and the role of vegetation in maintaining ecological balance.
- Emphasise the significance of responsible driving practices to minimise wildlife accidents.
- Provide comprehensive environmental awareness training to all workers.

6.1.6 Waste Management

- Implement waste segregation to prevent mixing hazardous and non-hazardous wastes.
- Provide bins for temporary waste storage and ensure proper disposal at designated sites.
- Recover, refurbish, and reuse damaged or wasted construction materials.
- Provide waste collection bins onsite.
- Run awareness campaigns on waste reduction and recycling.
- A private waste disposal company is to be contracted to transport and dispose of the solid waste from the site.

- Provide means for handling sewage generated by construction workers.
- Ensure proper design and installation of septic tanks.
- Clean and maintain septic tanks regularly to prevent overflows.
- Avoid disposal of non-biodegradable waste in septic tanks.
- Create mechanisms for the community to report waste disposal concerns.
- Solar Panel and Battery Management during the operational phase
- Proper disposal of damaged solar batteries and panels in consultation with environmental authorities.
- Repair and reuse damaged components when possible.
- Invest in durable solar panels, regularly maintain and follow proper disposal procedures.
- Contractor to develop waste management plan for construction waste as part of the contractor's environmental and social management plan.

6.1.7 Water Resources

- Harvest rainwater for use.
- Install water-conserving taps and meters to monitor and reduce water usage.
- Sensitise staff on water conservation practices.
- Regularly collect water samples for quality tests from the Kotobuiyei stream.
- Investigate and remediate any changes in water quality promptly.
- Implement water management controls to prevent contamination of the Kotobuiyei stream.
- The site contains fuel, oil, and hazardous substances, initiate measures to prevent accidental spillage, wash off in the Kotobuiyei stream, and percolation into the underground water table.
- Use surface protection measures to control soil erosion into the Kotobuiyei stream.
- Establish baseline data for the Kotobuiyei stream and regularly monitor the Kotobuiyei stream water quality.

6.1.8 Energy Management

- ***Transportation and Energy Management***

- Ensure efficient planning of material transportation to minimise fossil fuel consumption.
- Monitor and set targets for reducing energy use during construction activities.

- ***Energy Efficiency use during the construction and operation phase***

- Switch off electrical equipment, appliances, and lights when not used.
- Install energy-saving bulbs instead of high-energy-consuming bulbs.

6.1.9 Soil Management

- Use surface protection measures to control soil erosion.
- Stockpile subsoil and protect it for later use
- Topsoil should be removed and stockpiled for later use in landscaping or re-vegetation efforts.
- The site contains fuel, oil, and hazardous substances, initiate measures to prevent accidental spillage, wash off in the Kotobuiyei stream, and percolation into the underground water table.

6.1.10 Visual Impact

Minimise impact on the natural aesthetics of the construction site by implementing the following:

- Hoarding the site
- Implement proper site waste management and disposal to an approved facility by a certified waste management company.
- Ensure proper landscaping.

6.1.11 Occupational Health and Safety

- The contractor should recruit an occupational health and safety officer to manage, document, and report all health and safety issues on site.
- The contractor will develop a C-ESMP in compliance with this ESMP, national legislation and Bank ESFs which will include OHS management.
- The OHSE officer should conduct weekly toolbox talks for workers on various tasks' health and safety requirements and sensitise workers on spreading infectious diseases.
- Warning and safety signs should be prepared and installed in work zones, and First Aid Kits should be available for workers to use as needed.
- Hearing protection should be provided when sound levels over 8 hours reach 85 dB(A), and appropriate equipment should be chosen to reduce the risk of vibration-related injuries.
- The contractor should monitor weather forecasts for outdoor work and adjust work and rest periods to ensure employee safety and comfort.
- The contractor should provide temporary shelters or rest areas for the workforce, an adequate drinking water supply, training and licensing for industrial vehicle operators, mechanical assistance to reduce the physical demands of lifting and holding materials and tools, and rest and stretching breaks.
- Quality control and maintenance programs should be implemented to ensure equipment is in good working order. Provisions for reporting incidents, accidents, and dangerous occurrences during construction using prescribed forms should be in place. Workers should undergo safety inductions and toolbox talks and complete daily and weekly briefings.
- The site should display appropriate information and ensure that users understand the meaning and importance of each signage piece.
- The work site should be adequately and appropriately fenced, and access should only be given to authorised personnel.
- Adequate and appropriate personal protective equipment (PPEs) should be provided to all workers and official site visitors, along with a well-stocked first aid box that is readily available and accessible.
- Emergency telephone numbers, such as those for the ambulance and fire department, should be adequately and prominently displayed.
- Firefighting equipment, such as fire extinguishers, should be provided at strategic locations such as stores and hot work areas and inspected by an authorised person.
- Signs such as "NO SMOKING" should be prominently displayed in parts where flammable materials are stored.
- The contractor should enforce strict adherence to standard operating procedures for all work, hire fit and healthy workers, ensure their safety and health, and confirm no harm caused at the end of the project.

- Machines and equipment should be guarded to protect workers from injury, and ear protection such as earmuffs should be provided for workers in noisy and vibrating areas.
- Provide awareness training on infectious diseases.
- Ensure gender segregated well maintained (clean, in good repair with adequate soap and water) sanitation facilities and handwashing stations on-site.
- Reduce workplace congestion.
- Provide specific separated washrooms/toilets and changing rooms with adequate lights
- Enforce on-site and off-site speed limit regulations.
- The contractor should engage a dedicated focal person for Gender Based Violence/Sexual Exploitation and Abuse/Sexual Harassment (GBV/SEA/SH) prevention and reporting on meeting commitments in GBV Action Plan.
- ***Other Safety Measures and Emergency Preparedness***

- Fence the site at all times and restrict hazardous areas.

- Provide clear warning signs and flagmen for directing traffic as part of Traffic Management Plan to be included in C-ESMP

- Ensure fuel and oil spill kits are available and accessible.

- Refuel according to strict protocols.

- Regularly train workers on firefighting equipment operation.

6.1.12 Labour and Working Conditions

- Use unskilled/semi-skilled labour from the surrounding area and Bo Township for the construction work so that the local community can participate in the project, earn a living, and contribute to the development of their community.
- The contractor should ensure that the unskilled/semi-skilled labour is provided with adequate training and protective gear to ensure their safety and the quality of work. The contractor should also comply with all labour laws and regulations, including minimum wage requirements, working hours, and working conditions, ensure equal opportunity and accessibility for persons with disabilities, and ensure all workers sign the project Code of Conduct (CoCs). See Annex 1: Contractor Code of Conduct (CoC)
- In keeping with the project's GRM. the contractor will put in place a GM designed to ensure confidentiality and safety for workers, especially in cases of gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH). Community focal points will be trained to receive and refer complaints related to GBV/SEA/SH.
- The contractor must develop and enforce a code of conduct prohibiting child and forced labour in their direct employ and via their suppliers.
- Ensure strict access controls, such as security gates and check-in procedures, prevent unauthorised entry to the construction site and reduce the risk of theft, vandalism, and other criminal activities.
- Place high-value materials in secured, locked areas on-site to minimise the risk of theft and damage.
- Ensure regular training on ethical behaviour and safety to help workers understand the importance of adhering to ethical standards and following safety guidelines.
- Conduct background checks during hiring to help identify potential risks, such as prior criminal behaviour or drug abuse.

- A strict policy against alcohol and substance abuse is to be enforced to minimise the risk of accidents and conflicts arising from impaired judgment.
- Develop a procedure for reporting and resolving accidents and incidents.
- Engaging the local community to build positive relationships and foster support for the project.

6.1.13 Community Health and Safety

- The contractor will develop a C-ESMP in compliance with this ESMP, national legislation and Bank ESFs which will include community health and safety management.
- The contractor should recruit a Community Liaison Officer to support the Site Manager and Occupational Safety, Health and Working Environment (OSHE) officer in all matters related to relations with and the welfare and support of local communities.
- Community health and safety considerations are to be included in the C-ESMP.
- The contractor's community liaison's responsibilities include community engagement, enabling participation, implementation of proposed project grievance mechanisms and Workers' GRM, and implementation of Labour Management Plan (LMP), etc.
- The workforce should receive awareness training on preventing infection from diseases such as influenza, MPox, COVID-19, typhoid, and sexually transmitted diseases, and workers should be encouraged to act in accordance with the Code of Conduct and abstain from sexual relations with member of the local community or use suitable protection such as condoms.
- The contractor should conduct awareness programs to educate the workforce on their rights, available support services, and reporting mechanisms.
- Education and awareness training should be provided to workers and nearby communities on preventing GBV/SEA/SH incidents, and the contractor should implement and enforce strict codes of conduct for the workforce, emphasizing zero tolerance for harassment and abuse.
- The contractor should engage a dedicated focal person for GBV/SEA/SH prevention and reporting.
- Other measures to protect the community:
    - Minimise vehicle movements and discourage overloading.
    - Enforce strict adherence to speed limits for construction vehicles.
    - Conduct driving safety awareness campaigns.
    - Implement community safety awareness programs.
    - Encourage community reporting of drivers not following traffic rules.
    - Erect safety barriers during tree maintenance.
    - Restrict access to the site after trees fall and vegetation is cleared.
    - Coordinate with authorities for potential traffic issues.
    - Communicate construction activities, risks, and safety precautions to the community.
    - Undertake safety precautions to address hazards for nearby residents.
    - Enforce off-site speed limit regulations.

6.1.14 Cultural Resources

In the case of a chance find (Annex 2:)

- Work will stop, and local authorities will be consulted if cultural resources are found during work.

- Salvage excavation and relocation of artefacts or ruins will be conducted.
- Collaboration between the Ministry of Environment and the Monuments and Relics Commissions Authority will be ensured.
- Uncovered cultural resources will be handed over to the National Museums and Monuments Authority after consultation with local authorities.
- Important cultural sites will be marked and fenced during construction as per the provisions in the Chance Find Procedure (Annex 2).
- The provisions for Chance Find Procedure shall be incorporated in the contract to deal with chance find artefacts and shall be included in the Contractor's ESMP. The contractor will be obligated to follow the procedure and report to the PCU of any such finds for monitoring by the safeguards team at the PCU
- See Annex 2: Chance Find Procedure for details

The contract documents will incorporate the World Bank's "chance finds" procedure.

6.1.15 Ensure Security measures

- Resolve security risks by engaging with stakeholders regularly.
- Provide day and night security guards and adequate lighting on the project site.

Table 12: ESMP Implementation

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
Pre - Construction			
Non-availability of Construction Environment and Social Management Plan (C-ESMP). The C-ESMP ensures responsible and sustainable construction while providing a framework for stakeholder engagement to address their concerns.	Contractor ❖ The Contractor should develop and submit a C-ESMP for the administrative building and associated infrastructure construction activities. ❖ The C-ESMP should be approved by the Environmental Specialist and Social and Gender Specialist of the PCU-SLLAP before construction activities commence. ❖ CESMP to include: ➢ Traffic Management ➢ Occupational Health and Safety ➢ Waste Management ➢ Community Health and Safety ➢ Stakeholder Engagement ➢ Chance Find Procedure ➢ Grievance Mechanism (internal) for worker grievances including GBV/SEA/SH ➢ Vegetation removal and offset ❖ Contractor to develop GBV Actions Plan for approval by the PCU PCU ❖ PC to review and approve documents from the Contractor. Ensuring that they are in line with national legislation, the Bank's ESFs and this ESMP.	PCU- SLLAP /MLHCP PCU to ensure plans are developed and approved prior to start of construction activities	PCU E&S: Review will not require additional costs Contractor: No additional costs
Site Clearance.	❖ The Contractor will draw up a plan for approval by the PCU setting out what tress will need to be removed. This plan must be justified based on the footprint for construction and related concerns. ❖ Trees will be replaced on a two for one basis using the same or similar indigenous trees at the site or within 200m of the site.	Contractor, PCU-SLLAP /MLHCP	PCU E&S: No additional cost Contractor: 5,000

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ The contractor should take precautions to avoid cutting/damage to trees and vegetation outside the design/ unavoidable circumstances for the construction of the administrative building and associated infrastructure. ❖ Special efforts to be taken to avoid cutting down the *Milicia regia* due to its vulnerable conservation status. ❖		
Land use change Backyard gardening on site stopped, leading to loss of earnings and resentment	PCU ❖ Identify all users of site and determine compensation based on disclosed resettlement policy framework ❖ Where crops are present, allow harvesting prior to start of construction if possible	PCU- SLLAP /MLHCP, Bank	TBD
Impacts of design review process	❖ If the project's scope of work changes or is reviewed, the PCU and the Bank should assess the impact and decide if the ESMP needs to be revised based on emerging E&S risks, costs, etc. If required, the PCU SLLAP's Environmental Specialist will revise the ESMP in consultation with the Bank.	PCU- SLLAP /MLHCP, Bank	PCU E&S: Review will not require additional cost Contractor: No additional cost
Unclear worker roles and responsibilities, including leadership and accountability among the workforce, can lead to conflicts and disputes.	**Contractor** ❖ The Contractor should use unskilled/semi-skilled labour from the surrounding area and Bo Township to give the maximum benefit to the local community whenever this is possible. ❖ Develop and enforce a Code of Conduct (CoC) that explicitly outlines acceptable and unacceptable behaviour, including guidelines on appropriate interactions and relationships among workers, the neighbourhood and the broader community. ❖ Develop and enforce a Code of Conduct (CoC) that explicitly outlines acceptable and unacceptable behaviour, including guidelines on appropriate interactions and relationships among workers, the neighbourhood and the broader community. ➢ All workers are to sign the CoCs during employment process.	PCU- SLLAP /MLHCP PCU E&S Specialists to monitor employment process, ensure new contractor staff are inducted and that they have all signed and been briefed on the code of conduct.	PCU E&S: No additional costs Contractor: $10,000 PCU: No additional costs. Included in staff costs

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Employment process (contractor) should include an induction process conducted by the contractor that covers the following: ➢ Leadership structure of the contractor ➢ Staff and management responsibilities to Occupational Health & Safety, Community Health and Safety and Community Relations ➢ The Code of Conduct ❖ The contractor must put in place a GM designed to ensure confidentiality and safety for workers, especially in cases of gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH).		
Occupational Health and Safety (OHS) risks include impacts from dust, noise, vibration, hot work, site traffic, ergonomics, extreme temperatures, GBV/SEA/SH risk, risk of spread of communicable diseases, use and handling of hazardous materials and working conditions, Incident and accident recording and reporting.	**Contractor** ❖ The Contractor should recruit an occupational safety, health and environment officer to manage, document and report all health, safety, and environment protection issues (incidents and accidents) on site. ❖ The requirement to adhere to OHS mitigation and this ESMP in general should be embedded in the relevant contract with the contractor and include financial penalties. ❖ ❖ The contractor's OSHE officer shall conduct weekly toolbox talks for workers on the health and safety requirements of the different tasks included in the assignment and sensitize workers on the spread of infectious diseases. ❖ Prepare and install warning and safety signs in work zones. ❖ Provide hearing protection where necessary (when sound level over 8 hours reaches 85 dB(A)). ❖ To reduce the risk of vibration-related injuries, choose the appropriate equipment and use vibration-dampening pads or devices. ❖ Monitor weather forecasts for outdoor work and adjust work and rest periods to ensure employees are safe and comfortable. ❖ Provide temporary shelters or rest areas for the workforce.	PCU- SLLAP /MLHCP PCU E&S specialists to monitor implementation of the mitigation measures PCU to inform the bank no later than 48 hours after becoming aware of an incident; and no later than 24 hours for severe incidents/accidents, including fatality, SEA/SH allegations	Include in Contractor budget [this includes safeguard equipment and systems]. Contractor Safeguards Staffs will deliver all safeguard trainings. PCU E, S&G Specialists' monitoring will incur no additional costs. PCU S&G Specialists will

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Ensure that construction workers have an adequate drinking water supply. ❖ Provide training and licencing for industrial vehicle operators to ensure safe vehicle operation and establish clear rules and procedures for vehicle use. ❖ Use mechanical assists to reduce the physical demands of lifting and holding materials and tools. ❖ Incorporate rest and stretching breaks into work processes and rotate job tasks to reduce the risk of injuries from repetitive motion. ❖ Implement quality control and maintenance programs to ensure equipment is in good working order and reduce the risk of accidents due to equipment failure. ❖ Ensure that provisions for reporting incidents, accidents, and dangerous occurrences during construction using prescribed forms are in place. ❖ Ensure that workers undergo safety inductions. ❖ Provide appropriate signage at the site and ensure all workers undergo training on the meaning and importance of each signage. ❖ Adequate and proper fencing of the worksite and controlled access to only authorized personnel. ❖ Provision of adequate and appropriate personal protective equipment (PPEs) to all workers and official site visitors. ❖ A well-stocked first aid box, which is readily available and accessible, should be provided on the site premises. ❖ Emergency telephone numbers, such as those for the ambulance and fire department, should be adequately and prominently displayed. ❖ Firefighting equipment such as fire extinguishers be provided at strategic locations such as stores and hot work areas. ❖ An authorized person must inspect fire extinguishers and other equipment, which can only be used with an issued examination certificate. ❖ Signs such as "NO SMOKING" must be prominently displayed within the facility, especially in parts where flammable materials are stored.		support GBV/SEA/SH implementation and monitoring without additional costs. PCU will need to provide appropriate levels of PPE to staff entering construction sites. - $2000

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Enforce the strict adherence to standard operating procedure for all work ❖ The Contractor shall hire fit and healthy workers, ensure their safety and health, and confirm no harm caused at the end of the project. ❖ Guard machines and equipment to protect workers from injury. ❖ Provide ear protection such as earmuffs for workers in noisy and vibrating areas. ❖ Provide workers with awareness training on preventing infection from diseases such as influenza, Mpox, COVID-19, typhoid, and sexually transmitted diseases. ❖ Provide awareness training to the community on preventing infection from diseases. ❖ Provide hand washing stations for workers. ❖ Ensure well maintained and clean gender segregated sanitation facilities, including handwashing stations, and toilets are available on site. Facilities to include constant running water and light. ❖ Reduce congestion in the workplace. ❖ Implementation and monitoring of the project GBV/ SEA Action Plan. ❖ Conduct awareness programs to educate the workforce on their rights, available support services, and reporting mechanisms. ❖ Provide education and awareness training to workers to prevent GBV/SEA/SH incidents. ❖ Workers to sign the Code of Conduct. ❖ Implement and enforce strict codes of conduct for the workforce, emphasizing zero tolerance for harassment and abuse. ❖ The Contractor shall engage a dedicated focal person for GBV/SEA/SH prevention and reporting. ❖ The contractor should recruit a Community Liaison Officer to handle all matters of relations with, and the welfare and support of, local communities. ❖ Provide GBV awareness sessions for the community.		

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Conduct community awareness programs to educate the project community on their rights, available support services, and reporting mechanisms. The contractor shall engage a dedicated focal person for GBV/SEA/SH prevention and reporting. **PCU** ❖ Provide and enforce use of PPE on during site visits and inspections by PCU staff		
Risk of soil and contamination of the Kotobuiyei Stream through: improper handling, storage, transportation and disposal of the collected wastes; lubricants and fuel; accidental oil and chemicals spill, black and greywater Risk of pollution from construction wastes and water use on groundwater.	**Contractor** ❖ The requirement to adhere to this ESMP should be embedded in the relevant contract with the contractor and include financial penalties ❖ Contractor's ESMP should include a section on waste management ❖ Procure and place small and medium-sized bins at selected points for immediate temporary storage of collected wastes. ❖ Implement waste segregation to prevent mixing hazardous and non-hazardous wastes by placing small and medium-sized bins at selected points for immediate temporary storage of collected wastes. ❖ Specific areas on site shall be designated for temporarily managing the general domestic, construction and contaminated waste. ❖ Substitute raw materials or inputs with less hazardous or toxic materials. ❖ Institute good housekeeping and operating practices, including inventory control, to reduce the amount of waste that may prevent contaminated soil and waste from eroding into the Kotobuiyei Stream. ❖ Use building materials with minimal or no packaging to avoid generating excessive packaging waste. ❖ Use construction materials with recycled content whenever possible and in compliance with accepted standards. ❖ Contract a private waste disposal company to transport and dispose of solid waste from the site. ❖ Provide adequate personal protective equipment to all workers.	PCU- SLLAP /MLHCP PCU E&S specialists to monitor implementation of the mitigation measures	Contractor Waste Management Contractor – 12000 (1,000/ month) Water samples, analysis & reporting] 3,500. Soil samples, analysis & reporting] 3,500.

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Create awareness amongst the workers on the proper and safe disposal of waste and recycling of solid waste. ❖ Fuel and lubricant leaks from vehicles and other machinery shall be immediately rectified. ❖ Any contaminated waste shall be disposed of at an approved facility in consultation with the EPA-SL. ❖ Ensure mechanisms exist for the community to raise any complaints or feedback concerning the waste disposal by the contractor. ❖ Do not dispose of anything in the Kotobuiyei Stream. ❖ Use surface protection measures to control soil erosion into the Kotobuiyei Stream. ❖ Monitor downstream water quality routinely to ensure it stays within the established baseline. ❖ Make temporary drains as necessary to avoid waterlogging or erosion. These must be adequate for accumulated runoff water as well as rainfall. ❖ Discharge drains into well-vegetated areas. Provide mini silt collection ponds to prevent drain discharge into the Kotobuiyei Stream.		
Construction			
Implement mitigation measures to address the negative impacts identified in the ESMP.	**Contractor** ❖ **Through** toolbox talks, training sessions, and other communication channels, raise awareness among the workforce about the C-ESMP and its implementation in accordance with the project scope. ❖ Provide Health and Safety Training to the construction workforce (including subcontractors, temporary workers and drivers).	PCU- SLLAP /MLHCP E&S Specialists to monitor implementation of mitigation requirements of the ESMP by the contractor	PCU E&S monitoring will not require additional costs Training to be provided by contractor E&S specialists at no extra costs

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
Non-compliance with environmental regulations and international best practices.	**PCU** ❖ Establish an environmental management system that meets international standards and ensures compliance with all relevant regulations.	PCU- SLLAP /MLHCP Conduct regular environmental and social monitoring and reporting, as well as an audit of occupational, community health, safety audits, and environmental performance.	PCU E&S monitoring, auditing, and reporting 10,000
Unclear worker roles and responsibilities, including leadership and accountability among the workforce, can lead to conflicts and disputes.	**Contractor** ❖ The Contractor should use unskilled/semi-skilled labour from the surrounding area and Bo Township to give the maximum benefit to the local community whenever this is possible. ❖ Develop and enforce a Code of Conduct (CoC) that explicitly outlines acceptable and unacceptable behaviour, including guidelines on appropriate interactions and relationships among workers, the neighbourhood and the broader community. ➢ All workers are to sign the CoCs during employment process ❖ The Contractor should refer to the project Labour Management Plan (LMP) for guidance on workers' roles and responsibilities, including reporting structure.	PCU- SLLAP /MLHCP PCU E&S Specialists to ensure that construction workers understand and have signed the code of conduct via checking the records and interviewing cross sections of the workforce on a regular basis.	Included in contractor staff costs No extra costs to PCU
Underpayment or delayed payments of workers lead to complaints and conflict.	**Contractor** ❖ Ensure workers' contracts stipulate the expected remunerations, duration, period, and working conditions. Contractor to ensure that workers are aware of the details of their contracts.	PCU- SLLAP /MLHCP Conduct regular audits to ensure that	No Cost required

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Ensure the workers' payment rates meet the national standards for each job category/type. ❖ Ensure Provision of timely payment. ❖ Ensure Provision of Workers' Grievance Redress Mechanism (GRM).	workers are being paid on time and at the rates agreed / stipulated in their contracts	
Discrimination against women and persons living with disabilities in employment.	**Contractor** ❖ The Contractor should develop and implement clear equal employment opportunity conditions that explicitly prohibit discrimination based on gender or disability. ❖ The Contractor will conduct regular training sessions on diversity, inclusion, and preventing discrimination for all employees, supervisors, and managers. ❖ Incorporate universal design principles in the administrative building construction to ensure accessibility for persons with disabilities. ❖ All workers are to sign CoCs.	PCU- SLLAP /MLHCP Ensure contractor staff sign CoC through monitoring Monitor plans and construction to ensure that building designs include disability access and that contractors construct the access points as specified	Training on Diversity, inclusion, discrimination by consultant to contractor staff and PCU 5,000
Risks of child and forced labour	**Contractor** ❖ Develop and enforce a code of conduct prohibiting child and forced labour. ❖ Implement controls throughout construction work to ensure that child and forced labour are not being used. ❖ Report and remediate any violations of their code of conduct. ❖ Provide education and awareness training to all employees, suppliers, and sub-contractors.	PCU- SLLAP /MLHCP Conduct regular audits to identify instances of child and forced labour in contractor workforce.	No Cost required. PCU E&S, Specialists monitoring will incur no additional costs.

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
Worker theft, illicit affairs, and accidents can cause conflicts.	**Contractor** ❖ Strict access controls to prevent unauthorized entry. ❖ High-value materials secured in locked areas. ❖ Implement regular training on ethical behaviour and safety. ❖ Implement background checks during hiring to identify potential risks. ❖ Implement and enforce strict policies against alcohol and substance abuse. ❖ Develop clear procedures for resolving conflicts and disputes. ❖ Develop a plan for accidents and property damage. ❖ Engage the local community to build positive relationships. ❖ Establish a communication channel with local law enforcement to address criminal activities. ❖ Ensure whistle blower protection is in place to encourage reporting of unethical or criminal behaviour. **PCU** ❖ Ensure contractor is aware incident reporting requirements ❖ Foster good relations between the community and contractor by introducing them to community heads, institutional heads (the surrounding offices) and local law enforcement prior to the start of construction.	Contractor, PCU-SLLAP /MLHCP	Include in Contractor budget [this includes safeguard equipment and systems]. PCU E, S&G Specialists' monitoring will incur no additional costs.
Occupational Health and Safety (OHS) risks include impacts from dust, noise, vibration, hot work, site traffic, ergonomics, extreme temperatures, GBV/SEA/SH risk, risk of spread of communicable diseases, use and handling of hazardous materials and working conditions, Incident and accident recording and reporting.	**Contractor** ❖ The Contractor should recruit an occupational safety, health and environment officer to manage, document and report all health, safety, and environment protection issues (incidents and accidents) on site. ❖ The OSHE officer shall conduct weekly toolbox talks for workers on the health and safety requirements of the different tasks included in the assignment and sensitize workers on the spread of infectious diseases. ❖ Prepare and install warning and safety signs in work zones. ❖ Provide hearing protection where necessary (when sound level over 8 hours reaches 85 dB(A)).	PCU- SLLAP /MLHCP PCU E&S specialists to monitor implementation of the mitigation measures	Include in Contractor budget [this includes safeguard equipment and systems]. Contractor Safeguards Staffs will deliver all safeguard trainings.

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ To reduce the risk of vibration-related injuries, choose the appropriate equipment and use vibration-dampening pads or devices. ❖ Monitor weather forecasts for outdoor work and adjust work and rest periods to ensure employees are safe and comfortable. ❖ Provide temporary shelters or rest areas for the workforce. ❖ Ensure that construction workers have an adequate drinking water supply. ❖ Provide training and licencing for industrial vehicle operators to ensure safe vehicle operation and establish clear rules and procedures for vehicle use. ❖ Use mechanical assists to reduce the physical demands of lifting and holding materials and tools. ❖ Incorporate rest and stretching breaks into work processes and rotate job tasks to reduce the risk of injuries from repetitive motion. ❖ Implement quality control and maintenance programs to ensure equipment is in good working order and reduce the risk of accidents due to equipment failure. ❖ Ensure that provisions for reporting incidents, accidents, and dangerous occurrences during construction using prescribed forms are in place. ❖ Ensure that workers undergo safety inductions. ❖ Provide appropriate signage at the site and ensure all workers undergo training on the meaning and importance of each signage. ❖ Adequate and proper fencing of the worksite and controlled access to only authorized personnel. ❖ Provision of adequate and appropriate personal protective equipment (PPEs) to all workers and official site visitors. ❖ A well-stocked first aid box, which is readily available and accessible, should be provided on the site premises. ❖ Emergency telephone numbers, such as those for the ambulance and fire department, should be adequately and prominently displayed. ❖ Firefighting equipment such as fire extinguishers be provided at strategic locations such as stores and hot work areas.		PCU E, S&G Specialists' monitoring will incur no additional costs. PCU S&G Specialists will support GBV/SEA/SH implementation and monitoring without additional costs. PCU will need to provide appropriate levels of PPE to its staff entering construction sites. - $3000

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ An authorized person must inspect fire extinguishers and other equipment, which can only be used with an issued examination certificate. ❖ Signs such as "NO SMOKING" must be prominently displayed within the facility, especially in parts where flammable materials are stored. ❖ Enforce the strict adherence to standard operating procedure for all work ❖ The Contractor shall hire fit and healthy workers, ensure their safety and health, and confirm no harm caused at the end of the project. ❖ Guard machines and equipment to protect workers from injury. ❖ Provide ear protection such as earmuffs for workers in noisy and vibrating areas. ❖ Provide workers with awareness training on preventing infection from diseases such as influenza, Mpox, COVID-19, typhoid, and sexually transmitted diseases. ❖ Provide awareness training to the community on preventing infection from diseases. ❖ Provide hand washing stations for workers. ❖ Ensure adequate gender segregated sanitation facilities, including handwashing stations, are available on site. ❖ Reduce congestion in the workplace. ❖ Implementation and monitoring of the project GBV/ SEA Action Plan. ❖ Conduct awareness programs to educate the workforce on their rights, available support services, and reporting mechanisms. ❖ Provide education and awareness training to workers to prevent GBV/SEA/SH incidents. ❖ Workers to sign the Code of Conduct. ❖ Implement and enforce strict codes of conduct for the workforce, emphasizing zero tolerance for harassment and abuse. ❖ The Contractor shall engage a dedicated focal person for GBV/SEA/SH prevention and reporting.		

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ The contractor should recruit a Community Liaison Officer to handle all matters of relations with, and the welfare and support of, local communities. ❖ Provide GBV awareness sessions for the community. ❖ Conduct community awareness programs to educate the project community on their rights, available support services, and reporting mechanisms. The contractor shall engage a dedicated focal person for GBV/SEA/SH prevention and reporting.		
Increased energy consumption	Contractor ❖ Ensure planning of material transportation to prevent excessive consumption of fossil fuels (diesel, petrol). ❖ Monitor energy use during construction and set targets for reducing energy use.	PCU- SLLAP /MLHCP Monitor contractors' energy minimisation efforts.	No Cost required
Risk of soil and contamination of the Kotobuiyei Stream through: improper handling, storage, transportation and disposal of the collected wastes; lubricants and fuel; accidental oil and chemicals spill, black and greywater Risk of pollution from construction wastes and water use on groundwater.	**<u>Contractor</u>** ❖ Procure and place small and medium-sized bins at selected points for immediate temporary storage of collected wastes. ❖ Implement waste segregation to prevent mixing hazardous and non-hazardous wastes by placing small and medium-sized bins at selected points for immediate temporary storage of collected wastes. ❖ Specific areas on site shall be designated for temporarily managing the general domestic and construction d waste. ❖ Substitute raw materials or inputs with less hazardous or toxic materials. ❖ Institute good housekeeping and operating practices, including inventory control, to reduce the amount of waste that may prevent contaminated soil and waste from eroding into the Kotobuiyei Stream. ❖ Use building materials with minimal or no packaging to avoid generating excessive packaging waste. ❖ Use construction materials with recycled content whenever possible and in compliance with accepted standards.	Contractor, PCU-SLLAP /MLHCP PCU E&S specialists to monitor implementation of the mitigation measures	Include in contractor budget. *Other Contractor cost* [Water samples, analysis & reporting] 3,500. [Soil samples, analysis & reporting] 3,500.

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Contract a private waste disposal company to transport and dispose of solid waste from the site. ❖ Provide adequate personal protective equipment to all workers. ❖ Create awareness amongst the workers on the proper and safe disposal of waste and recycling of solid waste. ❖ Fuel and lubricant leaks from vehicles and other machinery shall be immediately rectified. ❖ Any contaminated waste stockpiled separately and disposed by an EPA licensed waste contractor. ❖ Ensure mechanisms exist for the community to raise any complaints or feedback concerning the waste disposal by the contractor. ❖ Do not dispose of anything in the Kotobuiyei Stream. ❖ Use surface protection measures to control soil erosion into the Kotobuiyei Stream. ❖ Monitor downstream water quality routinely to ensure it stays within the established baseline. ❖ Make temporary drains as necessary to avoid waterlogging or erosion. These must be adequate for accumulated runoff water as well as rainfall. ❖ Discharge drains into well-vegetated areas. Provide mini silt collection ponds to prevent drain discharge into the Kotobuiyei Stream.		
Impacts of air pollution (dust and emission) and noise generation from Construction Equipment, Vehicle and Machinery operation especially focussing on the four (4) houses that are in close proximity to the site and for the residents in the area and roads that are leading to and from the site	**Contractor** ❖ Ensure strict enforcement of on-site and off-site speed limit regulations. Provide the workforce with minimum Personal Protective Equipment (PPE) as required. ❖ Engage the houses nearby and the communities at large in the area to reduce risk associated with the construction ❖ Conduct periodic monitoring or when complaints arise. ❖ Ensure vehicle idling time shall be minimised. ❖ Fuelled construction equipment shall be used, where feasible, and properly tuned and maintained. ❖ Sensitise drivers to avoid unnecessary racing of vehicle (heavy	PCU- SLLAP /MLHCP Monitor implementation of the mitigation methods	Include in Contractor budget [this includes safeguard equipment and systems]. Contractor Safeguards Staffs will deliver all

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	and light) engines at loading/offloading points and parking areas and to switch off or keep vehicle engines at these points. ❖ Undertake activities that may be regarded as noisy during normal working hours. ❖ High-level equipment and machinery maintenance to reduce noise, vibration, and emission. ❖ Fit machinery and motorised equipment with exhaust mufflers/silencers to minimise noise generation. ❖ Sensitise construction drivers to avoid gunning of vehicle engines or hooting, especially when passing through sensitive areas such as schools and hospitals. ❖ Keep the nearby resident and offices informed of unavoidable noisy activities and their duration. ❖ Avoid unnecessary idling of internal combustion engines ❖ Speed Limit enforced to minimise dust generation on and off-site. ❖ Avoid excavation works in extremely dry and windy weather ❖ Enforcing remediation actions and implementing preventative measures. ❖ Undertake Monitoring of persistent noise complaints. ❖ Investigation of the complaints or significant changes in air quality to establish the root cause. **PCU** ❖ Investigate nuisance complaints by surrounding offices and residents		safeguard trainings. Contractor Cost [Air Quality sampling, analysis & reporting] 3,000. PCU E, S&G Specialists' monitoring will incur no additional costs.
Noise, and vibration,	• Planning activities in consultation with local communities so that activities with the greatest potential to generate noise are planned during periods of the day that will result in least disturbance • Using noise control devices, such as temporary noise barriers and deflectors for impact and blasting activities, and exhaust muffling devices for combustion engines.	PCU- SLLAP /MLHCP Monitor implementation of the mitigation methods	

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	• Avoiding or minimizing project transportation through community areas		
Dust and road usage	• Minimizing dust from material handling sources, such as conveyors and bins, by using covers and/or control equipment (water suppression, bag house, or cyclone) • Minimizing dust from open area sources, including storage piles, by using control measures such as installing enclosures and covers, and increasing the moisture content • Dust suppression techniques should be implemented, such as applying water or non-toxic chemicals to minimize dust from vehicle movements • Avoiding open burning of solid • Scheduling to avoid heavy rainfall periods (i.e., during the dry season) to the extent practical • Designing channels and ditches for post-construction flows • Providing adequate drainage systems to minimize and control infiltration	PCU- SLLAP /MLHCP Monitor implementation of the mitigation methods	
Access to hazardous materials in construction work site	**Contractor** ❖ Hazardous substances need to be kept in a bunded, secured storage area with an impermeable floor layer that can contain spillages. ❖ Ensure warning signage are adequately and prominently displayed ❖ Maintain supplies of spill kits at the hazardous substance storage facility to treat and manage any spills immediately. ❖ All wastes must be disposed of at an approved disposal site in consultation with the EPA-SL. ❖ Clear warning signage must be placed at the site.	PCU- SLLAP /MLHCP Regularly audit contractors hazardous waste management practises and	Include in Contractor budget [this includes safeguard equipment and systems]. PCU E, S&G Specialists'

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Ensure awareness training is conducted on all staff on hazardous material.	implementation of mitigation measure	monitoring will incur no additional costs.
The risks associated with fire hazards, fuel, oil, and other chemical spillage, and chemical fumes include injuries to nearby residents, offices, and users of roads close to the site and along the logistic route.	**Contractor** ❖ The site shall remain fenced at all times. ❖ Potentially hazardous areas such as trenches must be restricted and marked. ❖ Adequate warning signs of hazardous working areas shall be erected in suitable locations. ❖ Place flagmen to direct vehicle and machinery entry to the site. ❖ Ensure fuel and oil spill kits are available and accessible onsite in case of a spill, and if used, dispose of waste appropriately. ❖ Refuelling on the proposed project site is to be carried out according to strict protocols for refuelling in unprotected areas. ❖ Provide adequate personal protective equipment to all the workers. ❖ Emergency numbers for the local police, clinic/hospital and fire department shall be placed in a prominent area. ❖ Firefighting equipment shall be placed in prominent positions across the site where it is easily accessible. This includes fire extinguishers, a fire blanket, and a water tank. Workers need to be trained on how to operate the firefighting equipment. ❖ All flammable substances shall be stored in safe areas which do not pose an ignition risk. ❖ Enforce the reporting system for spillage incidents. ❖ Post "No smoking" signs at strategic places where fuel, oils and other chemicals are kept. ❖ Install adequate firefighting equipment and systems, including portable fire extinguishers. ❖ Maintain adequate first aid kits on site. ❖ Provide emergency eye and body showers.	PCU-SLLAP/MLHCP Audit process and ensure that mitigation methods are implemented.	Include in Contractor budget [this includes safeguard equipment and systems]. PCU E, S&G Specialists' monitoring will incur no additional costs.
Risk of exposure of community members to physical hazards on site.	**Contractor** ❖ Undertake safety precautions to address safety hazards for nearby residents and offices. ❖ The site shall remain fenced at all times.	PCU-SLLAP/MLHCP	Include in Contractor budget.

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Restricted access to the site. ❖ Place flagmen to direct light, heavy vehicles, and machinery entry to the site to protect community members using roads and sidewalks near the construction site. ❖ Coordinate with the relevant authority for potential traffic issues. ❖ Schedule noisy activities during acceptable hours and inform nearby occupants about potential disruptions. ❖ Provide clear communication to the nearby residents, offices and the community about construction activities, potential risks, and safety precautions. ➢ Interactions to be facilitated by community liaison officer	Ensure contractors communicate with surrounding receptors and schedules nuance activities to limit the impact on them Monitor implementation of mitigation measures	PCU E, S&G Specialists' monitoring will incur no additional costs.
The use of public roads by project vehicles increases the accident rate.	**<u>Contractor</u>** ❖ Traffic management measures to be integrated into C-ESMP ❖ Undertake safety precautions to address safety hazards for the nearby residents, including safety/warning signage, safety barriers around the construction site, and safe driving practices. ❖ Informing the public about construction risks. ❖ Minimise vehicle movements. ❖ Discourage overloading. ❖ Ensure compliance with all driving safety regulations and penalise drivers working for the project who do not follow them. ❖ Conduct driving safety awareness campaigns. ❖ Do not tolerate dangerous driving or even minor traffic infringement. ❖ Enforce strict adherence to the speed limit for all construction vehicles (light and heavy) on and off-site. ❖ Undertake community safety awareness campaigns and encourage community members to report drivers not observing traffic rules. ❖ Coordinate with the Sierra Leone Police and Road Safety Corps as and when necessary ❖ Ensure access to Hospital Road (main road near site) access is maintained for surrounding institutions and private individuals.	PCU- SLLAP /MLHCP Monitor implementation of Traffic Management measures by the contractor	Include in Contractor budget. PCU E, S&G Specialists' monitoring will incur no additional costs.

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
Risk of spread of communicable diseases (Sexually Transmitted Diseases SIIs, HIV/AIDS, COVID- 19, etc..) between workers and the community	**Contractor** ❖ Contractor to develop training plan to generate community awareness on the spread of communicable diseases ❖ Community awareness sessions on infectious diseases. ❖ Provide awareness training to the community on preventing infection from common and emerging communicable diseases. ➢ Interactions to be facilitated by contractor's community liaison officer ❖ Provide adequate WASH facilities for site staff -- **PCU** ❖ Review and approve awareness training plan content	PCU- SLLAP /MLHCP To monitor implementation of awareness training plan	*Contractor Cost* awareness training on disease prevention by consultant 5,000 PCU E, S&G Specialists' monitoring will incur no additional costs.
The security risks to the workforce and site from neighbouring residents, offices, and the wider community.	**Contractor** ❖ Resolve security risks to personnel and the project by regularly engaging stakeholders. ❖ Ensure general safety and security by providing day and night security guards and adequate lighting within and around the project site. **PCU** ❖ Introduce contractor to local stakeholders and security forces	Contractor, PCU-SLLAP /MLHCP	Include in Contractor budget. PCU E, S&G Specialists' monitoring will incur no additional costs.
Removal of Vegetation (i.e., tree and grass) beyond the site boundary.	**Contractor** ❖ Develop vegetation removal plan as part of the C-ESMP ❖ Tree and grass clearing should be restricted to the construction layout. ❖ Do not use fire to remove vegetation. ❖ Do not burn the cut/cleared vegetation. ❖ Contractor/workers shall avoid removal of vegetation and shrubs in adjacent areas ❖ Planting of trees and flowers as part of the landscaping work. **PCU** ❖ Approve plan	PCU- SLLAP /MLHCP NLC Administration The PCU E&S will monitor process to ensure that site clearance minimises the removal of trees	Include in Contractor budget. PCU E, S&G Specialists' monitoring will incur no additional costs.

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
		and or vegetation to what is required for construction purposes and detailed in the approved plan	
There is the potential for a chance to find cultural or archaeological significance during construction that could be impacted.	No cultural properties are visible on the work site or in the immediate vicinity. However, if any items of cultural value are accidentally found during excavation, the work shall be halted, and the finding will be reported. See "Chance Find" Procedures in annex 2	The Contractor is to be assisted by PCU-SLLAP - SLLAP /MLHCP, National Monuments and relics Commission, Bo City Council, and Bo District Council	N/A
Risk of ignoring stakeholders and their engagement regarding project implementation.	Implementation of the project SEP	Contractor, PCU-SLLAP /MLHCP	PCU- SLLAP /MLHCP Budget for GRM
Operations			
Discrimination against women and persons living with disabilities in employment.	❖ LC administration should implement clear equal employment opportunity conditions that explicitly prohibit discrimination based on gender or disability.	NLC Administration	No Cost required
Increased energy consumption	❖ Ensure electrical equipment, appliances and lights are switched off when not being used. ❖ Install energy-saving bulbs at all lighting points instead of bulbs that consume higher electric energy.	NLC Administration	Include in contractor Finishing Cost

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
High Water Demand	❖ Harness rainwater for use. ❖ Promote recycling and reuse of water as much as possible ❖ Promptly detect and repair the water pipe and tank leaks ❖ Sensitise staff/workers on water conservation measures by avoiding unnecessary toilet flushing, washing, etc. ❖ Ensure taps are not running when not in use.	NLC Administration	NLC Administration Cost
Risk of soil and contamination of the Kotobuiyei Stream through improper handling, storage, transportation and disposal of the collected wastes.	❖ Reduce the amount of waste generated. ❖ Provide proper facilities for storing and handling waste. ❖ Avoid accumulations of waste and clean empty containers after disposal. ❖ Dispose of waste at designated dump sites only. ❖ Create awareness amongst the workers on the proper and safe disposal of waste. ❖ Contract a private waste disposal company to transport and dispose of solid waste from the facility. ❖ Maintain separated toilets for male and females and ensure all toilets are in a clean and sanitary condition. ❖ Ensure sewage generated by the facility reports to septic tanks and is collected regularly by licensed septic trucks ❖ Sewage from facility should report to septic tank or similar and not to the stream or surrounding environment	NLC Administration	NLC Administration Cost
Damage to Kotobuiyei Stream and ground water resource by pollution with sediment or accidental oil and chemicals spill, black and greywater runoff into Kotobuiyei Stream.	❖ Ensure that Kotobuiyei Stream does not become an unofficial dumping ground for the facility ❖ Never allow sediment from bare eroding surfaces to report to the stream ❖ Monitor effluent (black and greywater) quality regularly to ensure that the stipulated discharge rules and standards are not violated.	NLC Administration	- No additional cost
Damaged and rundown solar batteries and solar panel.	❖ Proper disposal of damaged and rundown solar batteries and solar panels should be done in consultation with the EPA-SL or a certified e-waste recycling facility. ❖ If possible, repair and reuse damaged and rundown solar batteries and solar panels. ❖ Invest in more durable solar panels and batteries so they needn't be	NLC Administration	NLC Administration Cost

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	replaced as often. ❖ Regularly maintain your solar panels and batteries by cleaning them, checking for damage, and replacing faulty components to prolong their lifespan.		
The hazards associated with fire pose a risk.	❖ Firefighting equipment shall be placed prominently in the constructed building where it is easily accessible. This includes fire extinguishers, a fire blanket, and a water tank. Workers need to be trained to operate the equipment. ❖ Install adequate firefighting equipment and systems, including portable fire extinguishers.	NLC Administration	Include in Contractor budget NLC Administration Cost

6.2 INSTITUTIONAL ARRANGEMENTS FOR IMPLEMENTING THE ESMP

Establishing an institutional setup is critical for successfully implementing the Environmental and Social Management Plan for the National Land Commission Office construction work. The Environmental Management Specialist (EMS) and Social and Gender Specialist (E&S specialists) of the PCU will be responsible for implementing mitigation and monitoring measures of the ESMP. Furthermore, selected government institutions and NGOs focusing on environmental and social issues will collaborate with the PCU to ensure compliance with environmental and social safeguards of the construction work. The PCU will contract a construction company to carry out the construction work, including implementing all the environmental and social (E&S) mitigation measures stated in the ESMP.

6.2.1 Institutions

The roles and responsibilities of institution in the ESMP implementation is present in table 10-1 below.

Table 13: Roles & Responsibilities of Institutional Partners

Project Implementation Unit - PCU	The PCU is responsible for implementing and monitoring the Environmental and Social Management Plan (ESMP). It will ensure that mitigation measures outlined in the ESMP are incorporated into the Request for Proposals and integrated into the Bill of Quantities. Additionally, through its Environmental Management Specialist & Social and Gender Specialist, the PCU will supervise the contractor's work to ensure compliance with the project's Environmental, Social, Health, and Safety (ESHS) requirements and the ESMP. The E&S specialists will supervise the contractor OSHE officer and Community Laison Officer. They will also investigate and report all incidents/accidents on site and disclose information through periodic reports to the SLLAP stakeholders. The PCU may monitor itself if necessary and request corrections for any violations by the construction company.
Ministry of Environment and Climate Change	The Ministry of Environment and Climate Change collaborates with the PCU to ensure the project adheres to environmental standards and regulations.
Environmental Protection Agency of Sierra Leone (EPASL),	EPASL works with the PCU to enforce environmental protection measures and regulations during construction. Regular monitoring of construction activities and provision of environmental permit
Ministry of Social Welfare	The Ministry of Social Welfare collaborates with the PCU to address social aspects of the construction project, ensuring the well-being of the local community and stakeholders.
Ministry of Gender and Children's Affairs	This ministry works with the PCU to address gender-related and child welfare aspects of the construction project, promoting inclusivity and safeguarding vulnerable populations.
Bo City & District Councils	Bo City & District Councils collaborate with the PCU in the construction of the NLC office in the following roles: 1. Facilitating community engagement and ensuring the communities are informed about the construction project.
NGOs	Due to the grassroots-level engagement of these N communities, they possess insights into the primary concerns of the people regarding their socio-economic well-being and the impact of projects within their locality.

6.2.2 **Contractor**

The contractor is responsible for implementing all management and mitigation measures in the ESMP to address work-related environmental, social, health and safety risks and impacts. The contractor's contract will have clauses specifying compliance with ESMP, WBG EHS Guidelines, and national regulations and mandate action in cases of non-compliance. The staff strength of the contractor is expected to be about 50 including casual labour at the height of the construction. The contractor is responsible for ensuring that any subcontractors they engage comply with all E&S standards mentioned in this ESMP. The Contractor responsibilities shall include:

- Prepare and submit the C-ESMP to the PCU for review and approval.
    - C-ESMP to include OHS, GBV/SEA/SH action plan, forced and child labour, traffic management, community health and safety, waste management, worker grievance mechanism, etc.

- Ensure that its operations comply with the E&S standards in this ESMP, the ESCP, and the ESMF of the proposed administrative building construction work.
- Recruit and deploy OSHE and Community Liaison officers.
- Training/ or creating awareness for all personnel and community on relevant E&S safeguards measures.
- Submit the implementation report on E&S safeguards to the PCU.
- Liaise with the PCU E&S specialists on the need for corrective action if unexpected environmental or social problems emerge during the construction operations.
- Coordinate with the PCU Environmental Specialist and Gender & Social Specialist to address any unforeseen environmental or social issues during construction operations.
- Ensure compliance with all mitigation measures in this ESMP.
- Identify additional environmental mitigation or corrective measures that are deemed to be necessary during project implementation.
- Prepare reports on all aspects of environmental and social compliance.
- Maintain lists of all workers, including their age and gender.
- Maintain a workers' Grievance Redress Mechanism (GRM).
- Comply with accident and incident reporting as laid out in the ESMP.
- Comply with the guideline on "chance finds" when it occurs.
- Set up plans for action in the event of spills or leakages of hazardous materials and other environmental emergencies.
- Monitor the ESMP implementation against the monitoring indicators laid out in the ESMP.
- Ensure the signing of a code of conduct by every worker, including issues of Sexual Harassment, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse.

*6.2.2.1 **Contractor's OSHE Officer***

The contractor must designate an OSHE Officer to oversee the implementation of the ESMP, including supervising, monitoring, and reporting on mitigation measures. Their duties include maintaining records of accidents and incidents, waste management, providing water and sanitation facilities, conducting toolbox talks, training workers on the CoC and GBV issues, implementing the GRM, providing OSHE training, ensuring workers have PPEs, ensuring the safety of workers, communicating with staff on E&S compliance, leading compliance reviews, reviewing site conditions, coordinating

with staff, identifying additional mitigation measures, implementing control measures, and preparing reports for the Site Manager.

*6.2.2.2 **Community Liaison Officer***

The Contractor's Community Liaison Officer will assist the Site Manager and other staff in all community-related matters. Their duties include:

- Community liaison.
- Communication with staff and workers.
- Reporting relevant community issues.
- Planning for emergencies.
- Providing E&S awareness training.
- Participating in compliance reviews and consultative meetings.
- Reviewing site conditions post-completion.
- Implementing community support measures.
- Identifying additional mitigation measures.
- Preparing reports for the Site Manager.

*6.2.2.3 **C-ESMP & Associated Plans***

The contractor will prepare a detailed Construction Environmental and Social Management Plan (C-ESMP) that outlines their approach to meeting the ESMP standards and the associated costs. The C-ESMP should cover the following areas: final designs of the works, proposed work method statements, project site description, labour management plans, stakeholder engagement, emergency response, gender-based violence action, waste management, occupational health and safety, environment management plan, sample Code of Conduct, and chance find management. The C-ESMP must be in compliance with this ESMP and other project safeguard documentation such as the Labour Management Plan, Stakeholder Engagement Plan, GBV Action Plan, Resettlement Policy Frameworks and Grievance Mechanism.

In addition to the C-ESMP the contractor is to submit the following for approval by the PCU:

- Communicable Diseases Awareness Plan
- Tree Removal and Reinstatement Plan

7 ENVIRONMENTAL MONITORING PLAN

In order to be effective, environmental and social monitoring must be fully integrated with the overall project management at all levels of project activities and disaggregated according to gender. The monitoring plan with the associated costs provide a framework for implementing the recommend mitigation measures and identify cost estimates for the implementation of the plan.

Activity	E&S Risks and Impacts	Monitoring Indicator	Methodology	Responsibility	Phase	Monitoring Frequency	Cost ($)
Pre-construction preparation	Non availability of Construction Environment and Social Management Plan (C-ESMP) The C-ESMP ensures responsible and sustainable construction while providing a framework for engagement with stakeholders to address their concerns.	C-ESMP Report	Document Review	PCU- SLLAP /MLHCP	Pre-construction	Before commencement of the Proposed Construction Work.	No additional costs
Construction and operations	Lack of adherence to ESMP leading to increased risk of harm to environment and social receptors.	❖ Provide training to staff of the Land Commission to ensure mitigation methods are implemented during the operational life of the building e.g. relevant details of WMP included in details of waste	Field inspections and Document review	Contractor, PCU-SLLAP /MLHCP	All	At the beginning of Construction activity.	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs.

		management plan, etc.					
Construction	Non-compliance with the environmental regulation and international best practice	❖ Percentage of environmental management system goals achieved. ❖ Frequency of environmental and social monitoring and reporting. ❖ Number of occupational, community health, safety audits and environmental performance audits conducted. ❖ CESMP approved	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP		Throughout the Construction activity.	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs.
	Site Clearance	❖ Number of trees and vegetation damaged during construction. ❖ Percentage of trees and vegetation preserved during construction. ❖ Number of complaints received regarding damage to trees and vegetation.	Field Inspection	Contractor, PCU-SLLAP /MLHCP	Pre-construction	At the beginning of Construction activity.	
Human Resources during construction (hiring, firing, etc)	Non-compliance with local laws and Bank safeguards related to labour recruitment	❖ Construction worker contracts ❖ Payment of contractor and sub-contractor staff on time and the agreed upon (contractual) amount	Field interviews and Document review	Contractor, PCU-SLLAP /MLHCP	Pre -construction and construction	Quarterly throughout construction.	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs.

Human resources	Unclear worker roles and responsibilities, including leadership and accountability among workforce, can lead to conflicts and disputes.	❖ Job description, reporting lines and roles embedded in staff contracts ❖	Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Quarterly	Include in contractor budget. PCU E, S&G Specialists' monitoring will incur no additional costs.
Payroll	Delayed payment of workers leading to complaints and conflict.	❖ Staff payment schedules and records of payment. ❖ Number of surveys or focus groups meeting conducted.	Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Quarterly	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs.
Employment	Discrimination against women and persons living with disabilities in employment	❖ Workers Register, indicating gender and skill level. ❖ Workforce diversity. ❖ Number of surveys or focus groups meeting conducted.	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Monthly	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs.
Water and Sanitation	Lack of drinking water and sanitary facility at the work site	❖ Number of toilets and changing facilities for men, women (gender disaggregated), and people living with disabilities. ❖ Number of Training/Toolbox talk on hygiene practices.	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Monthly	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs.
Employment	Risks of child and forced labour	❖ The Contractor should refer to the SLLAP Labour Management Plan (LMP) on age of employment.	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Quarterly	Include in contractor budget PCU E, S&G Specialists' monitoring

		❖ Number of incidents related to child and forced labour reported and remediated. ❖ Percentage of employees who have completed education and awareness training on the risks of child and forced labour. ❖ The presence of an established system for employees to report any signs or concerns of child and forced labour in the workplace. ❖ Number of complaints and status of resolution					will incur no additional costs.
	Theft, Crime and Conflict	Incident reports, response time, and security measures effectiveness	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction & construction	Monthly	
Construction	Occupational Health and Safety (OHS) risks including impacts of dust, noise, vibration, hot work, site traffic, ergonomics, risk of spread of communicable diseases, use and handling of hazardous materials and working conditions,.	❖ Number of incidents and accidents recorded. ❖ Number of complaints from surrounding offices ❖ Number of trainings conducted on OHS	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Quarterly	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs.

Construction	Incidents of GBV/SEA/SH associated with the construction activities	❖ Training of workers on GBV/SH/SEA ❖ Number of complaints related to GBV/SH/SEA and status of resolution ❖ Whether or not all workers have signed the GBV/SEA/SH code of conduct	Document review	Contractor, PCU-SLLAP/MLHCP	Construction	Quarterly	5000
Electrical installation and operations	Increased energy consumption	❖ The number of energy-saving fluorescent tubes installed. ❖ Number of times and duration the generator is used per month.	Inspection and Document review	PCU- SLLAP /MLHCP NLC Administration	Construction and Operations	Quarterly	NLC Administration Cost
Construction	High Water Demand affecting water resources	❖ The volume of water consumed during construction. ❖ Number of water conservation taps installed ❖ Number of awareness training conducted workforce. ❖ Number of leakages detected and repaired. ❖ Number of inspections conducted per month. ❖ Rainwater collection infrastructure installed	Inspection and Document review	PCU- SLLAP /MLHCP NLC Administration	Construction & Operations	Quarterly	
Construction & Operations	Risk of soil and contamination of the Kotobuiyei Stream through improper handling, storage,	❖ Number of inspections conducted. ❖ Number of awareness training conducted on solid waste	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Construction & operations	Monthly	Include in contractor budget *Other Contractor cost* -Soil samples, analysis & reporting

	transportation and disposal of the collected wastes	management. ❖ Number of waste collection points ❖ Number of water samples collected for testing. ❖ Number of soil samples collected for testing.					3,500 -Water samples, analysis & reporting 3,500 PCU E, S&G Specialists' monitoring will incur no additional costs
Pre-construction and construction	Risk of pollution from construction wastes and water use on groundwater	❖ Number of inspections conducted ❖ Number of awareness training conducted on solid waste management. ❖ Number of waste collection points. ❖ Number of water samples collected for testing. ❖ Number of soil samples collected for testing.	Field inspection, Testing, and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Monthly	Include in contractor budget *Other Contractor cost* -Water samples, analysis & reporting 3,500 PCU E, S&G Specialists' monitoring will incur no additional costs
Construction and operations	Risk of poor sanitation facilities and sanitation conditions at work site	❖ Number of regular inspections done to check the quality and cleanliness of separated toilets for male and female toilets and handwashing stations. ❖ Number of complaints or feedback from employees regarding the sanitation facilities. ❖ Number of awareness campaign roll out	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Construction and operations	Monthly	PCU E, S&G Specialists' monitoring will incur no additional costs.

		among workers regarding the importance of maintaining good sanitation practices.					
Solar energy utilization	Damaged and rundown solar batteries and solar panel	❖ *Number of times solar panels cleaned (during dry season)* ❖ Training of staff to ensure system not overloaded ❖ Number of inspections to ensure only approved electrical are connected to solar panels	❖ Inspection	PCU- SLLAP /MLHCP NLC Administration	Operations	Quarterly	NLC Administration Cost
Construction work	Impacts of air pollution (dust and emission) and noise generation from Construction Equipment, Vehicle and Machineries operation.	❖ Records of quarterly air quality and Noise & Vibration monitoring. ❖ Records of engagements with surrounding offices regarding scheduling of works to minimise disturbances. ❖ The number of grievances captured on noise and vibration levels. ❖ Number of engine exhausts with mufflers installed.	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Quarterly and whenever a complaint is raised.	Include in contractor budget *Other Contractor Cost* Air Quality sampling, analysis & reporting 3,000 PCU E, S&G Specialists' monitoring will incur no additional costs Contractor Cost
Demolition and construction	Access to hazardous materials in construction work	❖ Number of hazardous material management training conducted. ❖ Record of incidences and accidents involving hazardous	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Quarterly and whenever a complaint is raised.	Include in contractor budget PCU E, S&G Specialists' monitoring

		material. ❖ Records of inspection of the hazardous material storage area.					will incur no additional costs
Demolition and Construction	Risk of exposure of community members to physical hazards on site.	❖ Record of incidences and accidents. ❖ Number of complaints received from the community. ❖ Number of sensitization measures for community. ❖ Number of signage available around construction site. ❖ Hoarding of site	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Monthly	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs
Construction and operation	The risks associated with fire hazards.	❖ Number and frequency of fire inspections conducted. ❖ Number and percentage of identified fire hazards that have been resolved. ❖ Number and percentage of employees who have completed fire safety training. ❖ Number and of fire drills conducted and the time taken to evacuate the building. ❖ Presence and functionality of fire suppression systems, smoke detectors, and emergency	Inspection	PCU- SLLAP /MLHCP NLC Administration	Pre-construction, construction and operations	Quarterly	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs

		management plans.					
	The use of public roads by construction project vehicles increases the accident rate.	❖ Record of incidences and accidents recorded. ❖ The number of defences driving awareness campaigns conducted. ❖ Number of complaints received from the community.	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Monthly	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs
Construction and Operations	Security risks for workforce and nearby resident, offices and broader city.	❖ Records of security alerts and interventions ❖ Records of stakeholder consultation on the security	Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Quarterly and whenever a complaint is raised.	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs.
Construction	Domestic animals killed by the project workers, vehicles and machinery/equipment	Number of grievances or complaints received.	Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Quarterly and whenever a complaint is raised.	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs.
Construction	There is the potential for a chance to find cultural or archaeological significance during construction that the construction could potentially impact	Number of "Chance Finds" documented and mapped with GPS coordinate.	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	During Excavation Work	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs.
Construction	There is the potential for a chance to find cultural or archaeological significance during construction that the	Number of "Chance Finds" documented and mapped with GPS coordinate.	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	During Excavation Work	Include in contractor budget PCU E, S&G Specialists' monitoring

	construction could potentially impact						will incur no additional costs.
Construction	Risks of lack of information on access to GM leads to lack of accountability.	Number of awareness sessions of GM.	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Quarterly	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs
Construction	Lack of information disclosure (including construction details, timelines, potential environmental and social issues, etc.) leads to lack of transparency and mistrust of the construction work among stakeholders.	Number of engagement sessions held.	Field inspection and Document review	Contractor, PCU-SLLAP /MLHCP	Pre-construction and construction	Quarterly	Include in contractor budget PCU E, S&G Specialists' monitoring will incur no additional costs

7.1 REPORTING

The PCU through the Environmental and Social and Gender Specialist have the overall responsibility for ensuring the implementation of the ESMP. Regular monitoring of the contractor's compliance with the ESMP will be monitored. The construction contractor is responsible for preparing a CESMP and ensuring that all workers are aware of the ESMP procedures contained in the ESMP. The contractor shall also ensure that an EHS Officer who will be responsible for the implementation of the CESMP for the contractor is recruited prior to the start of construction work and shall be maintained throughout the contract. The EHS Officer will report directly to the Environmental and Social and Gender Specialist of the PCU who will in turn report to the PCU.

The PCU will liaise with the Project Engineer and EHS Officer on whether there are any issues or challenges possibly preventing compliance with the plan e.g. unavailability of facilities (waste bins), irregular collection and disposal of wastes, safety issues, GBV issues etc. The construction contractor is responsible for providing training for workers in relation to ESMP issues as it relates EHS. The EHS Officer will be responsible for maintaining reports and records, including types and volumes of wastes generated by the Project activities.

8 CAPACITY BUILDING & TRAINING

E&S training will be required to ensure that the PIU, contractors and their workforce are aware of the requirements of the ESMP, the implications of non-compliance and to bridge any knowledge / competency gap that could hinder ESMP implementation. Three tiers of training will be required:

i. The environmental and social specialists will develop and administer training materials which detail the requirements of the ESMP and the responsibilities of the PIU for the attention of the PIU. This should be done prior to tendering of works contracts to ensure E&S requirements are embedded in works contracts and to ensure that ownership of the document lies with the whole PIU and not just the E&S Specialists.
ii. The approved Contractors Environment and Social Management Plan (CESMP) should include all the contractor's commitments to EHS in compliance with this ESMP and national laws. As such the contractor's E&S staff are responsible for developing training materials and implementing training across the workforce with the guidance of the PIU. Primary training should start at employment and take the form of a general induction which covers all topics in the ESMP but focus on
    a. Occupational Health and Safety
        i. The Contractor's responsibility to workforce OHS
        ii. Employees responsibilities in OHS
        iii. General site OHS
        iv. Measures to ensure health and safety employees of Bo city office complex and the general community health and safety
    b. GBV/SH/SEA code of conduct
    c. Waste Management
    d. Measure to reduce nuisance noise and dust

Secondary specialised briefings / training should be continued directly after based on an employee's assigned duties and should be refreshed regularly as appropriate and in the event of a change of assignment.

9 STAKEHOLDER ENGAGEMENT

Stakeholder engagement was conducted at national, district / local and community levels during the development of this ESMP.

National and District level engagements included the following institutions most of which were engaged in Q4 2023:

- Environment Protection Agency
- Bo City Council (Mayor, Deputy Chief Administrator, Environmental and Social Officer, etc
- Bo District Council (Chiefdom Administrator, Gender Officer, Environmental & Social Officer)
- Representatives of various district level institutions such as, Ministry of Land Housing and Country Planning, Ministry of Basic and Senior Secondary School, Teaching Services Commission
- NGOs such as the 50-50 Group, National Commission for People Loving with Disability Sierra Leone Land Alliance
- The National Fire Force
- National Water Resource Management Agency
- Sierra Leone Water Company
- Ministry of Employment, Labour and Social Security
- Ministry of Works & Public Assets
- Affected communities

Institutional engagements included informing stakeholders about project plans and providing details on the construction of the regional offices. Comments, questions and suggestions from stakeholders were focused on understanding projects plans and proposing solutions for limiting the negative impacts expected during implementation of this sub project. See Annex 5: Stakeholder Engagement details (proof of engagement)for full details of consultations.

At community level detailed interviews were held with 23 individuals in which they were informed of the sub project and its potential impacts both positive and negative and their perceptions of the sub project were gauged. During the interview a socio-economic survey was also conducted to understand the social environment in which the building will be constructed.

The main feedback and recommendations from the stakeholder engagement are as follows:

- The most relevant environmental and social issues related to this construction work are land use change, potential soil erosion, and surface and ground water contamination. Also, the neighbourhood may be impacted by increased traffic, noise, and dust during the construction phase.
- Potential for Sexual harassment, Sexual Exploitation, Gender based Violence (GBV) to increase in the project community.
- Consultation with local stakeholders is critical as they provide valuable input into identifying potential impacts and mitigation measures, as well as help monitor compliance with the ESMP.
- National and International Regulations related to waste management, water use, air quality, and noise pollution among others are applicable to the project to minimise any potential negative impacts on the environment and neighbourhood.
- The ESMP should include recommendation to plant trees and flower as part of the landscaping work, and also promote sustainability and reduce energy and water consumption
- Measures to mitigate these risks should be developed and implemented.
- Design should incorporate universal design principle to make the building accessible to individual with special needs.

- Sustainable construction materials should use and implementing energy-efficient systems.
- Train contractors and their employees on disability inclusion, accessibility requirements, and the importance of accommodating individuals with disabilities.
- Adhere to building codes to ensure access to NLC facilities, use universal design, provide easy access and parking, install elevators, and provide clear signage use the right. Add accessible fixtures to bathrooms and offices.
- Fire permit not required. However, the fire safety design of the building/facility are usually sent to the National Fire Force for review and advice.
- A well-designed fire safety plan should include fire-resistant materials, clearly marked exit routes, and proper classification of fire hazards. Essential equipment like fire doors, fire-rated walls, other fire suppressant material should be use.
- The National Fire Force will require to inspect the site during and after the construction work, and produce further advice on
- Keep materials and chemicals away from water sources, use spill prevention measures, and train personnel on safe chemical handling.
- Construction waste should be categories, stores and later dispose at approved sites to prevent contamination of surface and ground water from site wash off.
- Dispose of waste at approved sites and avoid open dumping.
- Use erosion control measures to prevent wash off from site to nearby surface water
- Secure chemical storage to prevent accidental spills, that result to both surface and ground water contamination.
- Immediate Clean-up of accidental oil/chemical spillage to prevent wash off into nearby stream in the event of rain, and percolation into the ground water.
- The underground septic system should be well-constructed to prevent seepage into the groundwater table.
- Register with NWRMA for the development of ground water facility.

10 GRIEVANCE MECHANISM (GM)

SLLAP recruited a Social and Gender Specialist who is in charge of all social, gender and GRM issues. The project has also prepared a dedicated GRM (Annex 5) for the project and the contractors are expected to have a GRM in place for their workers and communities. Community focal points at village level and grievance redress committees at Districts and national levels will be trained to receive and refer GBV related complaints to a GBV Service Provider hired by the project. The contractor's community liaison officer will be trained to receive and refer GBV related complaints to the Service Provider. Toll-free lines number 840 for Africell, Qcell and Orange have been activated. Grievance Redress Committees have been established in Bo, kenema, Makeni and Port Loko in February 2025. One GRM Focal point will be appointed as part of Field Teams during survey and land title registration. The complaint section of the website has been activated. Members of the public can now lodge complaint through the website. The national GRC has been established and trained. Plans are underway to establish the district level GRC. The district level GRCs will be established during the field work to establish the land committees. The GRM detail the flow and timeline for the resolution of grievances (See Annex 5).

The construction project will utilise the grievance procedures outlined in the SLLAP GRM to handle grievances and complaints from project-affected parties as they relate to their construction work. The GRM and SEP will address workers' and stakeholders' grievances while constructing the NLC office building and associated infrastructure. The contractor's assigned Occupational Health, Safety, and Environment Officer and Liaison Officer at the construction site will receive, register, and report workers' grievances, complaints, incidents, and accidents. The OHSE Officer for the contractor will work closely with the PCU Social and Gender Specialist. Additionally, the contractor's ESMP must outline a GRM procedure that

will also be reported on and monitored by the PCU. The SLLAP Grievance Redress Mechanism (GRM) is attached as Annex 5. The PCU and the implementing NGO (Rainbow Initiative) contracted by SLLAP will support the contractor.

11 BUDGET & RESOURCES

Table 14: Budget

Item	Description	Estimated Cost (USD)	Timeframe
Mitigation Measures			
Waste Management	Waste collection, segregation, and disposal	17000	Ongoing
Hazardous Material Management	Safe handling, storage, and disposal		Ongoing
GBV/SEA Prevention Diversity, Inclusion and Discrimination	Awareness, training, and reporting mechanisms	5000	Ongoing
Occupational Health and Safety (OHS)	PPE, safety training, first aid	5000	Ongoing
Community Liaison and Engagement	Meetings, consultations, grievance mechanisms	12000	Ongoing
Communicable diseases and Community Health and Safety	Meetings and capacity building.	5000	Ongoing
Monitoring Measures			
Environmental Monitoring	Air, water, soil quality testing	10000	Quarterly
Compliance Audits and Reporting	Regular site inspections, monitoring and audits for environmental, social, OHS, etc by PCU. Preparation and submission of monitoring reports	10,000	Monthly
Capacity Development			
Staff Training	Training on ESMP implementation, OHS, GBV, waste management	10000	Monthly sessions
Total Estimated Cost		**74,000**	

Note: ESMP costs has been discounted to ensure no double counting of monitoring related costs

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ANNEX 1: CONTRACTOR CODE OF CONDUCT (CoC)

SLLAP Code of Conduct to form basis of CoC developed by the contractor for the project.

INDIVIDUAL CODE OF CONDUCT

This individual **Code of Conduct** applies to and binds every and all employees, seconded staff, consultants, interns or volunteers working for or with or providing services or technical assistance under the Sierra Leone Land Administration Project at the Ministry of Lands, Housing and Country Planning.

I ……..……..……., an employee/seconded staff/consultant/intern/volunteer, acknowledge and commit to adhering to the environmental, social, health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and violence against children (VAC). All forms of GBV, SEA, SH or VAC are unacceptable, be it at the workplace/work site, the work site surroundings, at worker's camps, or the surrounding communities.

I accept to abide by the following terms and conditions in this code of conduct as long as I work for, with or on behalf of the Sierra Leone Land Administration Project:

Regarding ESHS and OHS

1. Will attend and actively partake in training sessions related to ESHS, OHS, Communicable Diseases and others as requested by my employer or service provider;
2. Always wear my personal protective equipment (PPE) when at the work site or engaged in project related field activities;
3. Adhere to a zero-alcohol policy during my working times and will refrain from the use of narcotics or other substances which can impair my mental faculty and abilities at all times.

Regarding equality of opportunity and treatment

4. Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic, or social origin, property, disability, birth or other status.

Regarding discrimination and violence based on gender or sexual exploitation and abuse/sexual harassment

5. Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
6. Not engage in any activity that will encourage sexual exploitation and abuse of project beneficiaries and members of the surrounding communities;
7. Not engage in sexual harassment of work personnel and staff; for instance, making unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature is prohibited, e.g., looking somebody up and down; kissing, howling, or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts;
8. Not engage in sexual favours; for instance, making promises of favourable treatment (e.g.

promotion), threats of unfavourable treatment (e.g. loss of job) or payments in kind or in cash, dependent on sexual acts-or other forms of humiliating, degrading or exploitative behaviour;

9. Unless there is the full consent[3] by all parties involved, not have sexual interactions with members of the surrounding communities or work colleagues. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered "non-consensual" within the scope of this Code;
10. Not commit any act of sexual violence that could result in physical, sexual or psychological harm or suffering to any individual or individuals, especially women and children;
11. Understand that sexual offences of any type are prohibited and will not compromise with anybody on the act of GBV/SEA/SH nor support the act;
12. Understand that sexual offence acts which includes sexual harassment; sexual exploitation; rape including a minor are all unacceptable and prohibited by law;
13. Will support the investigation of GBV/SEA/SH cases and will report to my supervisor any suspected or actual GBV case of my knowledge;

<u>Regarding children under the age of 18:</u>

14. Not participate in sexual contact or activity with children under the age of 18—including grooming or contact through digital media. Mistaken belief regarding the age of a child or his/her consent is not a defence or excuse.
15. Bring to the attention of my manager the presence of any children on the project sites or engaged in hazardous activities.
16. Wherever possible, ensure that another adult is present when working in the proximity of children.
17. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
18. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.
19. Refrain from hiring children below the minimum age of 14 unless national law specifies a higher age in the context of the project, or any labour which places them at significant risk of injury.
20. Comply with all relevant local legislation, including labour laws in relation to child labour and World Bank's ESF policies on child labour and minimum age.
21. Will take no naked picture of children.
22. When photographing or filming a child for work related purposes, I must:
    a) Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
    b) Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.

[3] **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

c) Ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive way. Children should be adequately clothed and not in poses that could be sexually suggestive.
d) Ensure images are honest representations of the context and the facts.
e) Ensure file labels do not reveal identifying information about a child when sending images electronically.

SANCTIONS

Sanctions and classification of faults

The Ministry of Lands Housing and Country Planning shall be responsible for making decisions on the specific sanctions to be imposed on workers who fail to comply with this Code of Conduct. I understand that if I breach this Individual Code of Conduct, the Ministry of Lands Housing and Country Planning will take disciplinary actions according to the seriousness of the offense which could include:

- Reprimand (verbal or written).
- Precautionary notice
- Suspension and will forfeit one month's salary.
- Termination of contract or employment and summary dismissal
- If the context warrants, the Ministry shall report to the Police.

Infringements sanctioned with verbal notification.

Those behaviours that do not cause greater material or moral damage or harm to the Project, other workers and/or its relationship with the communities. Verbal warnings may involve a reminder of the Code of Conduct and its applicability.

Infringements sanctioned with written notification.

Those behaviours that cause slight material or moral damage or harm to the Project, other workers and/or its relationship with the communities and/or the environment.

Infringements with pecuniary notice

Applicable to recurrent offenders whose course of conduct or actions continue after being notified more than 2 times in writing. "Course of conduct" means a persistent pattern of conduct comprising two or more acts carried out over a period that shows a continuity of purpose aimed at a particular person who is a survivor of the offence. The amount of these penalties will be set by the Ministry.

Infringements sanctioned with dismissal.

The dismissal of personnel shall be immediate in the case of serious misconduct in accordance with this Code of Conduct, and possible legal, civil and/or criminal actions for non-compliance.

Misconduct committed by employees are classified according to the following criteria:

Minor causes. Those considered of minor material or moral damage to the Project, other workers and/or its relationship with the communities will be punished with a written warning. Repetition of the same behaviour will be sanctioned with a second written warning. Repetition of the same behaviour after a second written warning will be sanctioned with a dismissal notice.

Serious Causes. All types of violence against women and children identified in Domestic Violence Act, Sexual Offences Act and the Child Right Act, in addition to others sanctioned in this Code of Conduct, under subtitles: Regarding discrimination and violence based on gender and Regarding children under the age of 18 will be considered serious misconduct. For the investigation and sanction of serious misconduct, the case will be referred to the relevant legal instances and, if proven, depending on the type of misconduct, the Ministry, will proceed to immediate dismissal.

If proven cases of violation of the fundamental rights of persons, particularly women or children, are identified, they will be referred to formal case management institutions with their consent, as a complaint for processing and sanction by the corresponding entity in strict application of the established legal procedures.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met; that I will adhere to the occupational health and safety management plan; and, that I will avoid actions or behaviours that could be construed as GBV. Any such actions will be a breach of this ***Individual Code of Conduct****. I do hereby acknowledge that I have read the foregoing Code of Conduct, agree to comply with the standards contained herein, and understand my roles and responsibilities to prevent and respond to ESHS, OHS, and GBV issues. I understand that any action inconsistent with this* ***Individual Code of Conduct*** *or failure to act, may result in disciplinary action and may affect my ongoing employment.*

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Definition of GBV Concepts

GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (that is, gender) differences between male and female individuals. GBV includes acts that inflict physical, mental, or sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV includes the following concepts:

- **Sexual Exploitation and Abuse (SEA):** Sexual exploitation is a facet of GBV that is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. In the context of World Bank supported projects, SEA occurs against a beneficiary or member of the community.
- **Sexual harassment (SH):** occurs between personnel and staff on the project and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

ANNEX 2: CHANCE FIND PROCEDURE

This procedure was developed in accordance with the World Bank's ESS 8 (to protect cultural heritage from the impacts of project activities and support its preservation, to address cultural heritage as an integral aspect of sustainable development, and to promote meaningful consultation with stakeholders regarding cultural heritage. To promote the equitable sharing of benefits from the cultural heritage).

This procedure is included as a standard provision in the implementation of ESLEAP Public Works contracts to ensure the protection of cultural heritage (Archaeological and Historic Sites). All implementers/contractors will be required to observe this procedure as documented hereafter.

Excavation in sites of known archaeological interest should be avoided. While this is unavoidable, prior discussions must be held with the PCU and the World Bank to undertake pre-construction excavation or assign an archaeologist to log discoveries as construction proceeds. Where historical remains, antiquity, or any other object of cultural or archaeological importance are unexpectedly discovered during construction in an area not previously known for its archaeological interest, the following procedures should be applied:

- Stop construction activities;
- Delineate the discovered site area;
- Secure the site to prevent any damage or loss of removable objects. In case of removable antiquities or sensitive remains, a full-time guard should be present until the responsible authority takes over;
- Notify the responsible staff, who in turn should notify the PCU and the World Bank, and local authorities (within less than 24 hours);
- The significance and importance of the findings will be assessed according to various criteria relevant to cultural heritage including aesthetic, historical, scientific or research, social and economic values;
- Decision on how to handle the finding will be reached based on the above assessment and could include changes in the project layout (in case of finding an irrevocable remain of cultural or archaeological importance), conservation, preservation, restoration, or salvage;
- Implementation of the decision concerning the management of the finding;
- Construction work can resume only when permission is given from the respective authorities, PCU, and World Bank after the decision concerning the safeguard of the heritage is fully executed;
- In case of delay incurred in direct relation to archaeological findings not stipulated in the contract (and affecting the overall schedule of works), the contractor may apply for an extension of time. However, the contractor will not be entitled to any kind of compensation or claim other than what is directly related to the execution of the archaeological findings and protections.

ANNEX 3: SURFACE AND GROUND WATER QUALITY RESULTS

Surface Water Sample Result

NATIONAL WATER QUALITY LABORATORY

TEL 077-547-020/079-317-532
MINISTRY OF WATER RESOURCES
TOWER HILL
FREETOWN

Water Quality Monitoring Report Sheet

Water Authority: MLCP Sierra Leone Land Administration Project

District: Bo Chiefdom: Kakua Town: Bo Town Date: 28th /12/2023

Sample: BSW Location: Swamp Type of Source: Swamp

Analyte Name	Units	WHO Guideline	SLBS Standard	Measured Value
pH		6.5-8.5	6.5 – 9.0	7.0
Turbidity	NTU	No value	75	13
Conductivity	µs/cm	<450	250	172
Total Dissolve Solid (TDS)	mg/L	<284	2500	86
Salinity	ppt	<4.0	NA	-
Residual Chlorine	mg/L	0.3-0.5 after disinfection		0
Aluminium	mg/L	<0.2	0.04	0.05
Ammonia	mg/L	No value	No value	0.42
Bromine	mg/L	No value	No value	-
Calcium Hardness	mg/L	<500	150	24.7
Copper	mg/L	<1.0	1	0.39
Fluoride	mg/L	<1.5		2
Iron	mg/L	<0.3	2	0.39
Magnesium	mg/L	<200	100	0.3
Manganese	mg/L	0.5	1	0.46
Molybdenum	mg/L	<0.25		0.10
Nitrite	mg/L	<3.0	1	0.09
Nitrates	mg/L	<10	20	10
Potassium	mg/L	<6.0		1.7
Phosphates	mg/L	<20	5	0.4
Sulphates	mg/L	<400	500	0
Sulphide	mg/L	<0.5		0

Sulphite	mg/L	No Value		0.2
Chloride	mg/L	<250		0
Chromium	mg/L	<250	0.05	0.12
Arsenic	mg/L	0.01	0.5	0
Bicarbonate	mg/l	No. Value		0
Zinc	mg/L	<5	5	0
E- Coli	CFU	Zero	10	Nil
Faecal coliform	CFU	Zero		100
Non-Faecal coliform	CFU	10		25
Salmonella Typhei	CFU	Zero		-

Signed: Edward Toby

(Supervisor)

Ground Water Sample Result

NATIONAL WATER QUALITY LABORATORY

TEL 077-547-020/079-317-532
MINISTRY OF WATER RESOURCES
TOWER HILL
FREETOWN

Water Quality Monitoring Report Sheet

Water Authority: MLCP Sierra Leone Land Administration Project

District: Bo Chiefdom: Kakua Town: Bo Town Date: 28th /12/2023

Sample: BGW Location: Well Type of Source: Ground Water Time:

Analyte Name	Units	WHO Guideline	SLBS Standard	Measured Value (02)
pH		6.5-8.5	6.5 – 9.0	6.9
Turbidity	NTU	No value	75	2
Conductivity	µs/cm	<450	250	61
Total Dissolve Solid (TDS)	mg/L	<284	2500	31.5
Salinity	ppt	<4.0	NA	-
Residual Chlorine	mg/L	0.3-0.5 after disinfection		0
Aluminium	mg/L	<0.2	0.04	0.05
Ammonia	mg/L	No value	No value	0.11
Bromine	mg/L	No value	No value	-
Calcium Hardness	mg/L	<500	150	5.3
Copper	mg/L	<1.0	1	0.12
Fluoride	mg/L	<1.5		2
Iron	mg/L	<0.3	2	0
Magnesium	mg/L	<200	100	1
Manganese	mg/L	0.5	1	0.33
Molybdenum	mg/L	<0.25		0.15
Nitrite	mg/L	<3.0	1	0.03
Nitrates	mg/L	<10	20	12
Potassium	mg/L	<6.0		6.1
Phosphates	mg/L	<20	5	0.8
Sulphates	mg/L	<400	500	0
Sulphide	mg/L	<0.5		0

Sulphite	mg/L	No Value		1.1
Chloride	mg/L	<250		0
Chromium	mg/L	<250	0.05	0.11
Arsenic	mg/L	0.01	0.5	
Bicarbonate	mg/l	No. Value		
Zinc	mg/L	<5	5	0
E- Coli	CFU	Zero	10	Nil
Faecal coliform	CFU	Zero		65
Non-Faecal coliform	CFU	10		Nil
Salmonella Typhei	CFU	Zero		-

Signed: Edward Toby

(Supervisor)

ANNEX 4: ECOLOGY SURVEY OUTCOME

Annex 1 : Plant species recorded during the survey

Botanical name	Family	IUCN	Uses	Growth Form
Asystasia gangetica	Acanthaceae		M	Herb
Anacardium occidentale	Anacardiaceae		F	Tree
Mangifera indica	Anacardiaceae		F	Tree
Spondias mombin	Anacardiaceae		F/U	Tree
Xanthosoma sagittifolium	Araceae		F	Herb
Cocos nucifera	Arecaceae		F	Palm
Elaeis guineensis	Arecaceae		T/F	Palm
Ageratum conyzoides	Asteraceae		M	Herb
Aspilia africana	Asteraceae			Herb
Chromolaena odarata	Asteraceae		M	Herb
Tridax pucumbens	Asteraceae			Herb
Newbouldia laevis	Bignoniaceae		M/U	Shrub
Combretum grandiflorum	Combretaceae		M	Liana
Kyllinga odorata	Cyperaceae			Sedge
Scleria barteri	Cyperaceae		U	Sedge
Tetracera alnifolia	Dilleniaceae		M	Liana
Croton hirtus	Euphorbiaceae			Herb
Macaranga bateri	Euphorbiaceae		W	Tree
Manihot Spp	Euphorbiaceae		F	Herb
Mareya micrantha	Euphorbiaceae		M	Shrub
Acacia mangium	Fabaceae		T	Tree
Albizia adianthifolia	Fabaceae		W	Tree
Albizia zygia	Fabaceae		W	Tree
Anthonota macrophylla	Fabaceae		M	Tree
Calapogonium mucunoides	Fabaceae			Herb
Desmodium adscendens	Fabaceae			Herb
Tamarindus indica	Fabaceae		F	Tree
Abrus precatorius	Fabaceae		M	Liana
Anthocleista nobilis	Gentianaceae		U	Tree
Phyllocosmus africanus	Ixonanthaceae		W	Tree
Gmelina arborea	Laminaceae		T/M	Tree
Persea americana	Lauraceae		F	Tree
Sida rhombifolia	Malvaceae		M	Herb
Ficus capensis	Moraceae		M/F	Tree
Ficus exasperata	Moraceae		M	Tree
Milicia regia	Moraceae	VU	TM	Tree
Musa sapientum	Musaceae		F	Shrub
Psidium guajava	Myrtaceae		F/M	Tree
Phyllanthus discoideus	Phyllanthaceae		W/M	Tree

Andropogon gabonensis	Poaceae		U	Grass
Axonopus compressus	Poaceae		U	Grass
Eleusine indica	Poaceae		M	Grass
Imperata cylindrica	Poaceae		U	Grass
Panicum maximum	Poaceae		U	Grass
Sporobulus jacquemontii	Poaceae			Grass
Andropogon tectorum	Poaceae			Grass
Borreria verticillata	Rubiaceae			Herb
Morinda geminata	Rubiaceae		M	Tree
Nauclea latifolia	Rubiaceae		M	Shrub
Citrus Sinensis	Rutaceae		F	Tree
Trema guineensis	Ulmaceae			Shrub
Lantana camara	Verbenaceae		M	Herb
Annona muricata	Annonacae		F/M	Shrub
Synedrellaa nodiflora	Arestaceae			Herb
Mimosa pudica	Fabaceae		M	Herb
Homalium africanum	samydaceae		T/M	Tree

Uses of plants
F – Food
M – Medicinal
T – Timber
U – Utility
W - Wood

ANNEX 5: STAKEHOLDER ENGAGEMENT DETAILS (PROOF OF ENGAGEMENT)

Table 15: Summary of Stakeholder Engagement Discussions

Stakeholder	Date of Consultation	Venue	Discussion	Comments/Questions/Suggestions
The Environment Protection Agency – Sierra Leone ***Chief Director***	27th October 2023	Freetown Office	Project brief including duration What are the most relevant environmental and social issues related to this construction project? What role should local stakeholders play in the ESMP development and implementation? What environmental and social regulations should be enforced for office building construction projects?	• The most relevant environmental and social issues related to this construction work are land use change (loss of vegetation and possibly small mammals' habitat and movement corridor), potential soil erosion, and surface and ground water contamination. Also, the neighbourhood may be impacted by increased traffic, noise, and dust during the construction phase. • Potential for Sexual harassment, Sexual Exploitation, Gender based Violence (GBV) to increase in the project community. • Consultation with local stakeholders is critical as they provide valuable input into identifying potential impacts and mitigation measures, as well as help monitor compliance with the ESMP. • National and International Regulations related to waste management, water use, air quality, and noise pollution among others are applicable to the project to minimise any potential negative impacts on the environment and neighbourhood. • The ESMP should include recommendation to plant trees and flower as part of the landscaping work, and also promote sustainability and reduce energy and water consumption.

Stakeholder	Date of Consultation	Venue	Discussion	Comments/Questions/Suggestions
Freetown City Council ***Freetown City Engineers***			Project brief including duration Perceived environmental and Social Risks Building design and construction methods Issues with Building Permits	• The potential environmental and social impacts include noise, air pollution, traffic related incidents – on and off site, occupational and community safety. • Measures to mitigate these risks should be developed and implemented. • Design should incorporate universal design principle to make the building accessible to individual with special needs. • Sustainable construction materials should use and implementing energy-efficient systems. • Design drawings including specifications for review, approval should be sent to the Ministry of Works and Public Assets (MWPA), and issuance of a building permit has to be sort from the MLHC. • MWPA will determine if Geotechnical Investigation is required.
National Commission for Persons with Disability ***Programme Manager***			Project brief including duration Safety and Well-being of Individuals with Disabilities during Construction Accessibility of the NLC Administrative Building for all Compliance with Accessibility Standards Training and Awareness Program for contractors and its workforce on disability awareness and inclusion	• Construction sites must provide clear access and signage to ensure the safety of persons with disabilities. • Train contractors and their employees on disability inclusion, accessibility requirements, and the importance of accommodating individuals with disabilities. • Adhere to building codes to ensure access to NLC facilities, use universal design, provide easy access and parking, install elevators, and provide clear signage use the right. Add accessible fixtures to bathrooms and offices. • Monitor and ensure compliance with accessibility standards throughout construction.

Stakeholder	Date of Consultation	Venue	Discussion	Comments/Questions/Suggestions
National Fire Force - ***National Fire Officer***			Project brief including duration Emergency response/evacuation plans, Fire outbreaks and preparedness. Whether a fire permit or certification is a requirement for the works. What is the process of obtaining permits and approvals? Are there fire safety design requirements including equipment that must be incorporated into the office building's construction plans? What are the requirements for fire suppression systems in office buildings? How often should these systems be inspected and maintained? Are there training and education requirements for office building occupants and staff related to fire safety?	• The contractor should develop an emergency response plan that outline the assembly point(s) and direction. • Fire permit not require. However, the fire safety design of the building/facility are usually sent to the National Fire Force for review and advice. • A well-designed fire safety plan should include fire-resistant materials, clearly marked exit routes, and proper classification of fire hazards. Essential equipment like fire doors, fire-rated walls, other fire suppressant material should be use. • Firefighting tools should be readily accessible. • Requirements vary by location and building type, but typically include the installation of fire prevention measures such as sprinklers, fire extinguishers and smoke detectors. The design should also include a water storage tank and water source with one or two hydrants for firefighting. • The National Fire Force will require to inspect the site during and after the construction work, and produce further advice on • The frequency of inspections often varies. It could be monthly. Fire extinguisher refill could be done half yearly. • Building occupants should be trained on fire safety, including how to use fire extinguishers and evacuate the premises.

Stakeholder	Date of Consultation	Venue	Discussion	Comments/Questions/Suggestions
			Is fire safety training provided by the National Fire Force?	
National Water Resources Management Agency (NWRMA) ***Hydrologist/GIS Officer***			Project brief including duration Management of construction - related waste, including materials and chemicals to prevent adverse effects on nearby water bodies. Adoption of rainwater harvesting and water recycling practices to conserve and reuse water resources. Is there a water usage limit for public building construction and Operation?	• Keep materials and chemicals away from water sources, use spill prevention measures, and train personnel on safe chemical handling. • Construction waste should be categories, stores and later dispose at approved sites to prevent contamination of surface and ground water from site wash off. • Dispose of waste at approved sites and avoid open dumping. • Use erosion control measures to prevent wash off from site to nearby surface water • Secure chemical storage to prevent accidental spills, that result to both surface and ground water contamination. • Immediate Clean-up of accidental oil/chemical spillage to prevent wash off into nearby stream in the event of rain, and percolation into the ground water. • The underground septic system should be well-constructed to prevent seepage into the groundwater table. • Water quality monitoring should be conducted near the site (approximately 50m-100m depending on the elevation) of the underground water before and after commissioning the office complex. • Register with NWRMA for the development of ground water facility.

Stakeholder	Date of Consultation	Venue	Discussion	Comments/Questions/Suggestions
SALWACO ***Director of Research and Planning*** ***Senior Research Officer***			Project brief including duration Water supply system around the project area. Administrative building construction impact on water supply. Any their requirement for use water pump efficiency and water-efficient fixtures and systems. Is there a water usage limit for public building construction and Operation.	SALWACO provides pipe borne water supply to resident in the in the four townships (Bo, Makeni, Kenema, and Port Loko). • If SALWACO were to provide water supply to the construction work in the four regions, the demand for water supply would increase. However, SALWACO has indicated that this increase in demand will not be a burden to their operation as long as prompt payment is made for the water supplies. • To conserve water as a finite resource, it is advisable to use water-efficient fixtures and systems, as well as other water-saving technologies both during construction and in the final building. • There is no information available regarding any water usage limit.
Ministry of Employment, Labour and Social Security ***Commissioner of Labour***			Project brief including duration Potential Social and Community Impacts related to the construction work that may affect the project local area in terms of employment opportunities, housing, and community services. Labour and Occupational Safety Regulations for construction work. Potential Employee Contract Issues. Worker Conditions and Safety.	
Ministry of Works and Public Assets ***Chief Engineer***			Project brief including duration	• Environmental and Social Risks include waste management and intermittent noise and air pollution, disruptions to nearby residents, potential health and safety concerns for workers and nearby residents.

Stakeholder	Date of Consultation	Venue	Discussion	Comments/Questions/Suggestions
			Perceived Environmental and Social Risks related to Construction Work Approval Process for Public Building Construction Projects Engineering Design Standards for Public Building Construction	• Approval process involves the following steps: o Review of Structural Design to ensure that it is meet universal accessibility standards. o Fire Safety standards for fire-resistant materials, alarms, and sprinkler systems – Liaise with NFF. o Geotechnical Investigation result if require by virtue of the construction site.
Sierra Leone Land Alliance ***Director***			Project brief including duration Perceived Environmental and Social Risks related to construction work. How will the project protect the rights of landowners and occupants near the SLNLC Administration Office and related infrastructure construction site?	• Incorporate landscaping and planting of trees and flowers to compensate for even minimal loss of vegetation. • Consideration for disabilities access • Involve the local community in the construction work. • Discuss the type of structures to be built with the community/stakeholder.

Stakeholder	Date of Consultation	Venue	Discussion	Suggestion/Concerns/Recommendations
Bo City Council Deputy Mayor Deputy Chiefdom Administrator	30th Oct, 2023	Bo City Council	▪ Presentation - An overview of SLLAP; - Purpose of the ESMP; - Overview of office building construction project, site location, construction duration; - Potential positive and negative environmental and social impacts, and mitigation measures identified; and - Role of stakeholders Engagement. ▪ Feedback	▪ To ensure the construction work comply with all relevant regulations. ▪ SLLAP - PCU should continue to engage the city and district council during the construction work implementation. ▪ Give preference to contractors from Bo district and the southern region who fulfil minimum criteria to promote local economic development and job creation in Bo District. ▪ Prioritise the procurement of supplies for the construction work from local businesses in Bo City and the region.
▪ Gender Officer ▪ Environmental and Social Officer ▪ Development Planning Officer ▪ Women Leader ▪ Vice Chairperson - Women group ▪ Market Women - Deputy ▪ Councillor ▪ Community Voluntary ▪ Youth member ▪ Drivers Union ▪ Petty Trader ▪ Civil Society ▪ NDMA ▪ Persons with Disability ▪ Bike Ridder ▪ Police	31th Oct, 2023	Bo City Council/ Project Site		▪ Concerns about the tree cutting and land clearance was raised. Measures to make the NLC compound look greener with trees after completion is recommended. ▪ Employment opportunities for Bo City residents during the construction and operation, and how they can apply for these jobs. ▪ The building's accessibility for persons with disabilities and all relevant safety standards to be in place. ▪ Promoting gender equality in the construction and operation work, such as providing training and leadership development opportunities for women workers ▪ Enforce selected contractor(s) recruit competent environment and social officer to implement mitigation measures captured in the ESMP study. ▪ Measures to mitigate the potential negative impacts of the construction and operation on the environment and surrounding community. ▪ Formulate procedures for waste management and disposal during and after the construction and operation. ▪ Health and safety measures for workers and the community during the construction and operation to be address.

Stakeholder	Date of Consultation	Venue	Discussion	Suggestion/Concerns/Recommendations
▪ Journalist ▪ Case Salone (Local NGO) ▪ Chief/Reservation ▪ Religious Leader				▪ Employment opportunities for the local community during the construction and operation. ▪ Implementing a robust communication strategy to keep the nearby residents, offices, wider community and stakeholders informed about the progress of the construction work and any potential impacts. ▪ Measures to ensure that the building is accessible to persons with disabilities and meets all relevant safety standards. ▪ Impact of construction on local traffic and implementing traffic management measures. ▪ Implementing rigorous training and awareness message on the need to protect women and girls selling food stuff close to site and those residing around from Gender base violence/Sexual Exploitation and Abuse/Sexual Harassment (GBV/SEA/SH).

Stakeholder	Date of Consultation	Venue	Discussion	Comments/Questions/Suggestions
Gender Officer, Environmental & Social Officer - Bo City Council	29th Oct, 2023	Bo City Council	Relevant environmental and social issues for the office building construction project such as impact on trees, cultivated swamp, noise/dust pollution, safety, traffic, disruption to neighbouring offices, waste management, safeguarding vulnerable groups. legacy issues like increased traffic, noise, or changes to the land.	▪ Replant trees, shrubs and flowers to replace to green cover loss on the Bo site. ▪ Immediate clean-up of hydrocarbon and other chemical spills, install sediment traps to prevent erosion and using eco-friendly construction materials. ▪ Avoid excavation work during windy and dry weather condition or soak to the ground to minimise dust pollution. ▪ Minimise noise generation. ▪ Provide personal protective equipment, implementing safety protocols, and conducting regular safety inspections. ▪ Enforce speed limit, place flag man to control traffic, and scheduling deliveries during off-peak hours. ▪ Communicate with nearby resident and offices to inform them of construction activities. ▪ Provide regular updates on construction activities and addressing any concerns they may have. ▪ Implement robust Grievance Redress Mechanism (GRM) ▪ Hiring women workers and promote them to leadership role.

Stakeholder	Date of Consultation	Venue	Discussion	Comments/Questions/Suggestions
				▪ Include measures such as recycling and proper disposal of hazardous materials. ▪ Regular maintenance and upkeep of the NLC building to ensure its longevity and safety. ▪ Provide safe access to the site, ensuring accessibility for persons with disabilities, and creating a safe and secure environment for all workers.

Bo District Council Chiefdom Administrator	30th Oct, 2023	Bo District Council	▪ Presentation - An overview of SLLAP; - Purpose of the ESMP; - Overview of office building construction project, site location, construction duration; - Potential positive and negative environmental and social impacts, and mitigation measures identified; and - Role of stakeholders Engagement. ▪ Open the follow Comments/Questions/ Suggestions	▪ **SLLAP** to consider giving priority to contractors based in Bo District that satisfy the minimum construction criteria ▪ Promote the use of locally sourced construction materials. ▪ Construction work is often associated with poor working conditions, and therefore, the study should fully address this problem developing specific measures to be complied by the contractor. ▪ All environmental issues and social vices as applied to construction be address in the study. ▪ All the best practices in construction work should be included in the ESMP study. ▪ Maintain collaboration between the SLLAP - PCU and the district and city councils throughout the construction phase for supportive monitoring.

Stakeholder	Date of Consultation	Venue	Discussion	Comments/Questions/Suggestions
Bo District Council	29th Oct, 2023	Bo District Council	Relevant environmental and social issues for the office building construction project such as impact on trees, cultivated swamp, noise/dust pollution, safety, traffic,	▪ Replant vegetation to restore greenery which also mitigate change in land use. ▪ Trap sediment from site to so it will not enter the swamp and the Kotobuiyei stream.

Stakeholder	Date of Consultation	Venue	Discussion	Comments/Questions/Suggestions
Gender Officer, Environmental & Social Officer			disruption to neighbouring offices, waste management, safeguarding vulnerable groups. legacy issues like increased traffic, noise, or changes to the land.	▪ Implement the three C's control, contain and clean up for chemical spillage. ▪ Minimise noise and dust pollution. ▪ Reducing noise levels as much as possible. ▪ Providing the minimum personal protective equipment (PPE) to the workforce. ▪ Using flagmen to control traffic into and from the site ▪ Regularly notify the site neighbourhood of the construction activities and address any complaints. ▪ Provide separated toilet for male and female for construction workers to prevent open defecation. ▪ Promote merit female staff to leadership positions. ▪ Stockpile waste on sit before disposal. Also, dispose hazardous waste properly. ▪ Ensure safe site access, disability accessibility, and worker safety. ▪ Inform nearby communities, offices and stakeholders about construction activities.

ANNEX 6: GRIEVANCE REDRESS MECHANISM

THE REPUBLIC OF SIERRA LEONE

MINISTRY OF LANDS, HOUSING AND COUNTRY PLANNING

SIERRA LEONE LAND ADMINISTRATION PROJECT (P177031)

GRIEVANCE REDRESS MECHANISM (GRM) MANUAL

June 2024

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List of abbreviations

CERC	Contingency Emergency Response Component
CSO	Civil Society organization
ESS	Environmental and Social Safeguards
ESMP	Environmental and Social Management Plan
FP	Focal Person
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
MLHCP	Ministry of Lands, Housing and Country Planning
NGO	Non-Governmental Organization
PAP	Project Affected Person
PCU	Project Coordination Unit
PDO	Project Development Objective
PGC	Project Grievance Committee
PIC	Public Information Campaign
PSC	Project Steering Committee
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SGS	Social and Gender Specialist
SLLAP	Sierra Leone Land Administration Project

TA	Technical Adviser
WB	World Bank
WC	Ward Committee

Project Background

The Project Development Objective (PDO) of the Sierra Leone Administration Project (SLLAP) is to establish an efficient and accessible land administration system. The Project will address critical challenges within the land sector in Sierra Leone. These include: i) weak institutional and technical capacity in the delivery of cadastral and registration services; ii) weak legislative framework in land administration and management; iii) tenure insecurity and inefficiency in land/property transactions; iv) increasing and unresolved land disputes within the statutory and customary tenure systems; and v) gender inequality relating to access to and control over land resources and decision-making.

SLLAP will be delivered across four components including Institutional Development and Legal Reform, Development of a Land Information System, Recording and Registration of Land Tenure Rights, Project Management and Contingency Emergency Response Component (CERC).

Ensuring lasting impacts of these initiatives will require setting out procedures for screening and monitoring the environmental and social risks of the project and deciding on the level of assessment and mitigation process. Success will mean building safeguards awareness among implementers so that they can move beyond measuring the functionality of investments. It will also mean providing access to a Grievance Redress Mechanism (GRM) through which Project Affected Persons (PAP) can seek redress for project-specific decisions that adversely affect them and their communities. This manual focuses on particular considerations for achieving the foregoing outcome as presented in the subsequent sections.

Grievance Redress Mechanism (GRM) for SLLAP

This is the comprehensive project-wide Grievance Redress Mechanism (GRM) that will be instituted by the Project Coordination Unit (PCU) before the commencement of field work to enable a broad range of stakeholders to channel their concerns, questions, and complaints to the various implementation agencies, through multiple grievance uptake channels. Particularly, the GRM will be managed by the PCU Social and Gender Specialist to address any related issues and complaints. This will address resettlement, environmental and social impacts, and general stakeholder queries. Gender-Based Violence (GBV) complaints will be handled as per the project's GBV Action Plan.

Essentially, the GRM will assist in receiving and resolving complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. It outlines a transparent and credible process for fair, effective, and lasting outcomes. Similarly, it builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM will:

Provide affected people with avenues for making a complaint or resolving any disputes that may arise during project implementation.

Ensure confidentiality and non-retaliation to complainants.

Ensure survivor centered approach to GBV related complaints.

Ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants.

Avoid the need to resort to judicial proceedings as a way of seeking redress.

The Grievance Redress Mechanism Process for SLLAP

The grievance redress process will focus on issues or disputes that the project may cause due to the activities that the project is implementing. These may be grievances from people who feel that project activities related to construction works, legal reforms, digitization of land records, establishment of a geodetic network, or the registration of land is affecting them negatively. This could for example be the case if field staff in any of these activities engages in corrupt practices or demonstrate other signs of misconduct.

Sllap will also face general land disputes during the implementation of land registration, demarcation, and land title adjudication under component 3. These general land disputes can be: (1) pre-existing, land disputes that have existed before sllap implementation; (2) systematic land registration and land title adjudication related disputes that may occur as a result of sllap implementation.

SLLAP does not resolve these disputes directly. The NLC shall be responsible for managing and resolving these types of disputes. However, if they are reported during the systematic registration work, the SLLAP field team focal points shall refer them to the appropriate disputes redress bodies and shall monitor the resolution process.

The project will handle grievances at three levels:

(a) Village-level grievances from Land Registration Activities under SLLAP will be handled by the GRM Field Teams Focal Points. Focal point is one of positions in the SLLAP Land Registration Field Teams that will include team leaders, para-surveyors, para-legals, and other positions that are not yet determined that is proposed for the SLLAP. These focal points will operate at the village, town, and chiefdom level as part of the Land Registration Field Teams.

(b) SLLAP District Level Grievance Redress Committee for systematic land registration: this committee will provide technical supervision and quality control at the district level for the Land Registration Field Teams operating under SLLAP at the village level. This structure will be done through SLLAP District Level Coordination Teams. These teams will then also serve as the SLLAP District Level GRC. Each of the SLLAP target districts would therefore have one District Level GRC. The District Level GRC will receive cases from the village level per the field team GRM focal points or directly from citizens that report grievances to this level based on the contact information shared by the field team GRM focal points. SLLAP will establish the composition, procedures, and tools for the District Level GRC to address grievances within their mandate or for directing general land disputes to the relevant NLC structures at the different levels. Any grievance that cannot be resolved at this level can be elevated to the SLLAP Central Level GRC.

(c) SLLAP Central Level Grievance Redress Committee: For grievances directly caused by SLLAP, a central SLLAP GRC had been established in November 2023. The central SLLAP GRC does not engage in land dispute resolution, land title adjudication, or GBV grievance resolution. The only responsibility of the central SLLAP GRC is to resolve SLLAP related concerns, such as those related to staff misconduct, etc., which are reported to them or forwarded by the District Level GRC or village level GRM focal points, through the Social and Gender Specialist of SLLAP.

In establishing the GRM, the PCU shall put in place and popularize the following channels through which project stakeholders, citizens, beneficiaries can file complaints or get feedback on SLLAP implementation:

A web based GRM platform to be developed by the PCU;

A toll-free number shall be set up by the PCU.

WhatsApp (a mobile device with voice and video connections);

Verbal or written appeal received during the on-site monitoring meetings or via field staff;

Incoming correspondence addressed to the Project Coordinator.

Incoming correspondence addressed to PCU via e-mail.

Complaint/suggestion boxes to be place at easily accessible locations in the communities.

Monitoring of Suggestion boxes

The process of monitoring suggestion boxes is very crucial to the success of the GRM. Suggestion boxes shall be placed in the Local Court Barry of each chiefdom of the project district, under the supervision of the court Clerk. Complaints, concerns, questions deposited into the suggestion boxes shall be collected bi-weekly. The PCU shall engage the DLC Offices (after they are set up) or CSOs to support the project by collecting complaints from suggestion boxes from their different communities of operation. Complaints collected from suggestion boxes shall be kept in the DLC Offices for the attention of the Social and Gender Specialist. Quarterly visits will be made to communities to assess the functionality of the suggestion boxes. Training will be conducted for partners on how to maintain anonymity of complainant and confidentiality of complaints.

On a bi-weekly basis, the social and Gender Specialist shall collect and read through all the letters deposited into the suggestion boxes and categorise them into: general land disputes, citizen's complaints about the project and complaints related to SLLAP staff misconduct. All grievances related to general land disputes shall be referred to the National Lands Commission. Grievances related to citizens' concerns shall be directed to the District Level GRC. Any grievance related to SLLAP staff misconduct shall be referred to the Central Level GRC. The central Level GRC will also handle all complaints forwarded by the District Level GRC, through the Social and Gender Specialist of SLLAP. All GBV related grievances shall be forwarded directly to the GBV Service Provider. The grievance redress process across these structures shall be monitored and regular update will be provided to the M&E Specialist of the PCU and the digital database to enhance monitoring of the grievance redress process.

Composition of the Grievance Redress Committee

Grievance Redress Committees (GRC) shall comprise focal points identified in communities to receive, handle or refer complaints to the district level or national level GRCs. At district level, SLLAP District Grievance Redress Committees shall be established to handle cases received from focal points or directly from people that report grievances to this level through the reporting channels shared by the field team GRM focal point or the Social and Gender Specialist. In November 2023, SLLAP established the Central Level Grievance Redress Committee to deal with grievances directly caused by SLLAP.

Village-level GRM processes for Land Registration Activities under SLLAP

The SLLAP field teams that will carry out systematic registration activities may face different kinds of grievances such as pre-existing land disputes; objections to title registration; SLLAP specific grievances; and GBV grievances.

The registration and demarcation of land under SLLAP will be carried out by Land Registration Field Teams that will include team leaders, para-surveyors, para-legals, and other positions that are not yet determined. One position in these Field Teams that is proposed for the SLLAP related grievances is a SLLAP GRM Focal Point. These focal points will operate at the village, town, and chiefdom level as part of the Land Registration Field Teams. The GRM Focal Points will be identified and will receive training on their role. Information about this network of focal persons will be disseminated to communities during sensitization activities.

Selection Criteria for Field Team Focal Points

The PCU will liaise with stakeholders to identify Focal Points in all project communities. Focal point must be adults (male or female) that live or work in the community. They will receive training on their roles, responsibilities, and scope of work. Their primary role is to receive and register complaint and forward to the Social and Gender Specialist. As community members, complainants (especially women and girls) may trust them to take complaints forward. Information about this network of focal points will be disseminated to the communities during sensitization activities. They will also be trained on psychological first Aid, provided with information to make appropriate basic referrals of GBV complaints to the Social and Gender Specialist and GBV Service Providers. Ensuring anonymity of complainant and that absolute confidentiality is maintained.

Training needs for GBV Focal Points, covering basic training on the topics listed below:

Grievance redress process.

GRM reporting system.

GRM steps and complaints handling steps.

Filing of project specific grievances.

Filing of land specific grievances.

Psychosocial first aid.

Basic referrals of GBV complaints.

Anonymous reporting.

Confidentiality of complaints.

Handling of corruption related case.

SLLAP District Level Grievance Redress Committee for systematic land registration

The Land Registration Field Teams operating under SLLAP at the village level, will require technical supervision and quality control at the district level. This structure will be done through SLLAP District Level Coordination Teams. These teams will then also serve as the SLLAP District Level GRC. Each of the SLLAP target districts would therefore have one District Level GRC.

The District Level GRC will receive cases from the village level per the field team GRM focal points or directly from citizens that report grievances to this level based on the contact information shared by the field team GRM focal points. SLLAP will establish the composition, procedures, and tools for the District Level GRC to address grievances within their mandate or for directing general land disputes to the relevant NLC structures at the different levels. Any grievance that cannot be resolved at this level can be elevated to the SLLAP Central Level GRC.

Composition of District Level GRC (at least two women)

1 Paramount chief.

1 Chiefdom Clerk.

1 District Land Commissioner.

1 Court chairman – local.

2 Religious leaders (Muslim & Christian).

1 District council representative.

1 City Council representative.

1 police representative.

1 NGO/CBO.

Representative of each party of the conflict.

A member of the District Level Committee shall be appointed secretary and shall record the procedure and outcome of the grievance resolution process in the GRM register. Grievance will be received and transmitted to the District Level GRC by the (Secretary of the District GRC) through an official form and the applicant will be duly notified within 3 days of lodging a complaint. The Committee will sit as and when complaints are lodged. The grievance redress process at this level shall include the stages listed below:

No.	Grievance redress steps/process	Timeline
1	Receipt of grievances (logging)	1 day
2	Acknowledgement of grievances	Within 3 days
3	Verification, investigation, negotiations, and actions	Within 7 days
4	Provision of Feedback to parties	Within 10 days
5	Signing off on corrective actions and agreement	Within 14 days
6	Implementation of agreement	Within 1 month
7	Closure of grievance	Within 1 month

If the grievance can be resolved by the Grievance Committee, corrective actions will be determined. Once an agreement has been satisfactorily reached, the applicant will be asked to sign off the grievance closeout form.

If the applicant remains dissatisfied with the outcome, the grievance will be forwarded to the National Level GRC. In the case of land related disputes, the grievance will be forwarded to the Land Commission for appropriate solution.

SLLAP Central Level Grievance Redress Committee

For grievances directly caused by SLLAP, a central SLLAP GRC was established in November 2023.

The central SLLAP GRC does not engage in land dispute resolution, land title adjudication, or GBV grievance resolution. The only responsibility of the central SLLAP GRC is to resolve SLLAP related concerns, such as those related to staff misconduct, etc., which are reported to them or forwarded by the District Level GRC or village level GRM focal points, through the Social and Gender Specialist of SLLAP.

At this level, a national toll-free line will be manned by operators who will receive complaints, log, categorize, and forward them to the appropriate persons or authorities for action. To ensure the effective functioning of the

toll-free line for project related grievances, the Social & Gender Specialist will serve as the focal point within the PCU to provide oversight of the process and to ensure quality assurance of the grievance mechanism.

SLLAP specific WhatsApp numbers will be established to allow project affected people to contact the PCU via WhatsApp chats. The Social and Gender Specialist will monitor the incoming cases, manage referrals if needed, and document all steps including grievance solution.

The SLLAP website will include a central-level GRM reporting tool. The website is https://sllap.molhcp.gov.sl/. The Communications and Community Engagement Specialist will work with the Social and Gender Specialist to make the reporting tool functional. The Social and Gender Specialist will monitor the incoming cases, manage referrals if needed, and document all steps including grievance solution.

Worker related grievances

SLLAP will establish a dedicated GRM for worker issues.

Every contractor will have a grievance focal point as part of their teams in the different locations where civil works will occur. This focal point shall take up and document grievances and direct them to the SLLAP Central Level GRC through the Social and Gender Specialist.

Differentiating General Land Disputes and SLLAP-specific Grievances

General land disputes, which are to be handled by the NLC and its decentralized/related structures (District Land Commission, Chiefdom Land Commission (incl. Land Adjudication Tribunals) and Village Area Land Committees).

SLLAP will face such general land disputes during the implementation of land registration, demarcation, and land title adjudication under component 3. These general land disputes can be further sub-divided in two categories: (1) pre-existing, land disputes that have existed before SLLAP implementation; (2) systematic land registration and land title adjudication related disputes that may occur as a result of SLLAP implementation.

SLLAP does not resolve these disputes directly. The NLC shall be responsible for managing and resolving these types of disputes. However, if they are reported during the systematic registration work, the SLLAP Field Team Focal Points shall refer them to the appropriate disputes redress bodies and shall monitor the resolution process.

SLLAP-specific grievances, which are to be handled by a dedicated SLLAP GRM

These SLLAP-specific grievances can be subdivided into (1) grievances related directly to SLLAP field work activities (such as corruption, misconduct of staff in the context of all project activities, such as legal reform, capacity building, institutional reform, awareness raising, digitization, establishment of a geodetic network); (2) worker grievances related to civil works, either affecting the workers themselves or others that are affected by workers' conduct; and

(3) Gender Based Violence (GBV) related grievances that cut across all these categories and need to be handled separately from the other cases.

These types of grievances cannot be resolved by the NLC's land dispute resolution structures. If they are reported during land registration, the NLC shall referred such grievances to the project, since they will require the involvement of a SLLAP specific Grievance Redress Committee (GRC).

Implementation Steps of GRM

Grievance Redress Committees made up of Field Teams Focal Points, District level Grievance Redress Committees and Central Level Grievance Redress Committees, shall ensure timely and appropriate resolution of grievances arising from project activities. The coordination responsibility of the GRM shall rest with the Social Safeguards and Gender Specialist with support from the Community Engagement and Communications Specialist. Grievances can be relayed to focal persons in affected communities, contractors and supervising teams and service providers (for SEA/SH complaints) or directly relayed to a call/report centre (Toll free line) etc. at all project sites and communities.

Once complaints are received at any levels, they will be forwarded for sorting, to the Social and Gender Specialist. The Social and Gender Specialist shall refer the complaint to the appropriate grievance redress committee or National Lands Commission, as the case may be, for resolution and tracking of process. The Social and Gender Specialist shall ensure that the following processes are adhered to:

Ensure that committees investigate grievances and propose appropriate measures to avoid or minimize adverse impacts of the interventions.

Ensure that the processes comply with existing safeguard procedures and policies.

Build the capacity of focal persons in effective community engagement, grievance handling, and negotiation and conflict resolution.

Build trust and maintain rapport by providing affected persons and the wider public withadequate information on the project and its GRM procedures.

Follow up with GRCs on the status of investigations and resolution of grievances, as well as communicating outcomes to complainants.

Keep and maintain up to date complaints and grievances register.

Regularly provide a report on GRM results to the project management team and the World Bank.

Related to GBV, the committee will only make referrals to the designated service provider for case management. Investigation of the perpetrator lies with the Family Support Unity (police) if found to be a project employee in accordance with the accountability framework. GRCs at any level have no role with regard to case management or investigation of GBV cases. They only make referrals of GBV cases to the designated service provider or the social and gender specialist of the project for referral to the GBV Service Provider. The survivor will however be referred to service providers with strong data sharing protocols that will not put the survivor at risk.

The GRM will include the following steps:

GRM stages	Description of tasks	Responsibility	Timeline
Training on the design and operation of the GRM and the implementation of the GBV Action Plan	Trainings will be conducted for the PCU and members of the committees, focal persons, contractors, and local communities to implement the GRM and GBV sensitive processes and ensure functionality of committees.	PCU, Social and Gender Specialist, GBV Consultant	After Project approval
Receive and register complaint	The Social and Gender Specialist shall be responsible for receiving and registering complaints for the purpose of consolidating, analyzing, and providing unified data. The PCU will liaise with stakeholders to identify Focal Persons at community levels to receive complaints and forward to the Social and Gender Specialist. Focal points shall resolve minor issues such as providing information, create awareness, direct and guide communities on mechanisms for filing general land disputes that are to be resolved by the NLC land dispute resolution structures, at the village level, CLCs, DLCs, and specifically the Land Adjudication Tribunals that will play a crucial role during the land registration process; and raise awareness on how to file SLLAP specific grievances, i.e., on how to make use of the SLLAP toll-free line to lodge grievances. SLLAP related grievances can also be reported directly to these GRM focal points who will forward grievances to the Land Adjudication Tribunals, Town and Village Area Land Committees, the Chiefdom Land Committees, the District Land Commission's Alternative Dispute Resolution Unit, the PCU or the central level SLLAP GRC as appropriate. The GRM focal point shall record all grievances related to SLLAP staff. This could include reports of corruption by field staff; lack of gender sensitive or culturally appropriate behavior; etc.	Social and Gender Specialist, Focal Persons	1 working day after receiving complaint
Acknowledge receipt of complaint	The Gender and Social Specialist will be responsible for giving feedback to the complainants via email, letter, text message, in-person, or call. The complainants must know that their complaints were recorded and under investigation. In case of anonymous complaints, an acknowledgement will not be given. The means through which the complainant is acknowledged will be recorded in the database, and after the grievance is resolved, the Gender and Social Specialist will provide feedback to the complainant and record his/her thoughts about the decision made.	Social and Gender Specialist	1 working day after receiving complaint

GRM stages	Description of tasks	Responsibility	Timeline
Screen and Assess Grievance	Once complaints are received, the Social and Gender Specialist will undertake preliminary assessment of the eligibility of complaints, categorize the grievance and assign priority (high, medium, and low severity and acknowledge receipts o complaints to complainant.	Social and Gender Specialist	2 working days after receiving complaints
Assign Responsibility	At this stage, the complaint is referred to the resolving officer or grievance redress committees or GBV service providers (for GBV related complaints) if it cannot be resolved immediately by the Social and Gender Specialist or focal persons. The Social and Gender Specialist/ focal person will assign timelines for investigating. Once transferred to the appropriate resolving officer or GRM committee, the Social and Gender Specialist/ focal person will track the resolution process to ensure timely feedback.		
Development of Response	Once the assessment/ investigation is completed, the social safeguard /focal person will receive the report and formulate a response and communicate to the complainant. The communication will state whether the grievance has been resolved or not , providing reasons for the decision, and indicate next steps.	Social and Gender Specialist, Focal Persons	2 working days
Implementation of Response if agreement is reached	The Social and Gender Specialist will ensure that the GRM Committee takes appropriate measures to remove the cause of the grievance and initiate a monitoring process to assess any further impacts of project-related work. Once settled, the Social and Gender Specialist and focal person record the complaint in the system as 'resolved' and inform the complainant of the outcome of the resolution process. For GBV related complaints, the Social and Gender Specialist will follow up with service providers to ensure the survivor is receiving adequate services in a survivor centered manner.	Social and Gender Specialist / Focal Person, GRM Committee	3 working days after registering complaint
Initiate review process if agreement is not reached	Minor complaints that may not require further action may be resolved by the Social and Gender Specialist. In case a minor complaint is not resolved by the Social and Gender Specialist, the issue shall be referred to the GRC. All other complaints shall be referred to the GRC for action. Grievance will be received and transmitted by the Social and Gender Specialist on to an official form and the applicant will be duly notified within 3 days of lodging a complaint.	Social and Gender Specialist	3 days after outcome

GRM stages	Description of tasks	Responsibility	Timeline
Implement review recommendation and close grievance	If the grievance can be resolved by the GRC, corrective actions will be determined. After the case is evaluated and corrective action determined, the proposed solutions or corrective or preventive actions shall be discussed with the complainant together with the timeframe for the implementation of the corrective measures.	Social and Gender Specialist	2 days after initial review
Appeal if complainant is not satisfied with outcome	If aggrieved party/parties are not satisfied with the outcomes of the first two processes, they may seek redress from the National Grievance Redress Committee of the Project. As is the case with appeals to the District GRC, appeals to the National GRC are also triggered at the point of resolution (at the district level) when an aggrieved party expresses dissatisfaction/rejection of the resolution action. The Social and Gender Specialist shall make a formal documentation of the appeal for presentation to the National GRC. Appeals can also be made verbally, in writing, via telephone or formal letters not more than 48 hours of the rejection of the resolution action by the GRC. The complainant will be informed about the appeal process and the outcome recorded accordingly.	Social and Gender Specialist	2 days after review recommendation
Grievance taken to court by complainant	If the aggrieved party is not satisfied with the outcomes from the above stages, the party has the right to go to the judiciary at their own expense.	Social and Gender Specialist	9 days after appeal outcome
Monitor and evaluate case	The PCU through the Social and Gender Specialist will monitor the grievance redress process and the implementation of the decisions made. The Social and Gender Specialist will work with with focal persons to ensure that redress is granted to affected persons in a timely and efficient manner. This will include providing regular reports to the Bank, noting the progress of implementation of grievance resolutions, timelines of grievance redress, and documentation procedures.	Social and Gender Specialist /Focal Persons	Throughout implementation
Feedback to complainant and other interested parties	The GRM System will be updated once the complaint has been resolved to close the complaint in the GRM System. The Social and Gender Specialist will contact the complainant, to evaluate if the complainant is satisfied with the resolution before the complaint is closed in the GRM system. If the complainant is not satisfied with the outcome of the investigation, a judiciary alternative could apply.	Social and Gender Specialist	Throughout implementation

GRM stages	Description of tasks	Responsibility	Timeline
Public Information Communications (PIC) Campaigns	This will be used to raise awareness of the GRM on where to submit complaints and the resolution process.	Social and Gender Specialist, Communications Specialist	Throughout implementation
Reporting	The status of grievances submitted and resolved will be discussed on weekly basis during project management meetings and reported by the Social and Gender Specialist (including the ESS Technical Adviser) to the Bank through quarterly progress reports. Internal monitoring of the delivery of the GRM will be the responsibility of the PCU. This information will be used to improve monitoring tools and approaches and the effectiveness of the processes employed		Monthly to the PCU and quarterly to the Bank
World Bank Environmental and Social Incident response requirement	Consistent with provisions in the Environmental and Social Commitment Plan (ESCP), the project will promptly notify the World Bank within 48 hours 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. These will 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.	Project Coordinator	48 hours after learning of the incident or accident.

Scope of the GRM

The GRM for the SLLAP will be available for use by all project affected persons and it will offer an opportunity for such persons to submit concerns or grievances and obtain resolution or feedback. The GRM will address project related concerns arising from the implementation of the project during the phases of design, construction, and operation. The Grievance Redress Mechanism encourages mutually acceptable resolution of issues as they arise.

The Grievance Redress Mechanism will be designed to be a process that allows for trust to be built between stakeholder groups and assures project affected persons that their complaints will be assessed in a fair and transparent manner. The GRM will allow simple and streamlined access to the Grievance Redress Mechanism for all stakeholders and will encourage project affected persons to raise their concerns. It will provide clear procedures for each stage of the grievance redress process and ensure equitable treatment for aggrieved individuals and groups through a consistent, formal approach that is fair, informed, and respectful. Complainants will be informed of the progress of their complaint, the

information that was used when assessing their complaint and information about the mechanisms that will be used to address it.

Below is the list of persons/groups the project's GRM will target and who will be informed about the existence of the GRM and provided with the necessary support to access it.

Persons that feel negatively affected by land registration and mapping outcomes;

Traditional Leaders;

District and City Councils;

Relevant Civil Society Organizations;

Community leaders and the Clergy;

Persons with Disability Groups

Women and girls centered groups;

Workers and youth groups;

Persons affected by or otherwise involved in project-supported activities.

Management of Reported Grievances

Lodging and Processing Grievance: When a complaint is received, the following is provided to the complainant in the language they can comprehend: information on how the GRM operates and the next steps (including a timeline), the contact information of Social and Gender Specialist, and a reference number by which the complaint can be tracked. Grievances will be managed as follows:

(a) The complainant will file the grievance, relating to any issue, verbally, in writing, through suggestion box or via telephone (number to be established) by the Social and Gender Specialist.

(b) The Grievance Redress Form in the GRM Manual will be used to record, process and file grievances. Where such are written, the grievance note would be signed and dated by the aggrieved person. Where complaints are received via phone, the call recipient will document all details;

(c) Where the complainants are unable to write, the focal person will write the note on the aggrieved person's behalf. The Social and Gender Specialist will work in concert with the GBV Service Provider and the Community Engagement and Communication Specialist in performing these roles. The written note will be read in one of the Sierra Leonean languages that the aggrieved person understands prior to signing.

Grievance Redress Mechanisms on Resettlement: The Resettlement Policy Framework (RPF) outlines the eligibility criteria and entitlements for resettlement compensations as well as the process and implementation arrangements for resettlement. The GRM for resettlement shall be done in accordance

with relevant laws and procedures in Sierra Leone which must comply with the Bank's standards on grievance redress processes.

Grievance Redress Mechanisms for GBV Survivors: GBV cases shall be handled by a specialized NGO that deals with GBV issues in Sierra Leone. The PCU will identify and partner with the specialized NGO to assist in GBV response including training and awareness raising on GBV for the local communities, community focal points, SLLAP PCU staff, contractors, and implementing partners.

Designated focal persons within local communities who will receive GBV related complaints will also be trained on how to handle such complaints and interact with survivors while ensuring confidentiality. The focal person or the committee has no role for investigating or managing cases of GBV. They make referral of the reported cases to the social and gender specialist or the designated service provider NGO. Interacting with a survivor requires special set of skills, which SLLAP expect from the designated service provider. This training will also ensure that direct workers, partners, sub-contractors, and suppliers are aware of the Code of Conduct (CoC) and GBV/SEA/SH issues during induction. Contractors will ensure that all workers sign CoC before being allowed on the project sites.

The Service Provider will ensure that care seeking behaviours and knowledge of how and where to report GBV cases are known. If GBV cases are reported to community focal persons, they shall immediately notify the social and gender Specialist and refer the matter to the Service Provider which will o support survivors to receive appropriate support services (medical/psycho--social counselling and legal aid as agreed with the survivor).

The GBV Service Provider will be supported by the Social and Gender Specialist at the PCU to follow up on redress progress at every step of the process, ensuring that the project redress measures are adhered to. The Social and Gender Specialist will follow up during case investigations and prosecutions (following the survivor's choice and if mandated by the country's laws) and report on the status of the case as well as progress in counselling and the provision of other support services for survivors.

Grievance Redress Mechanisms for Workers on Site: A hot line and a web based GRM will be established to enable aggrieved workers to register their grievances directly to the PCU, for the attention of the manager of the Construction Firm that will be implementing the civil works. Such complaints shall be registered automatically in the Project level GRM. The contact number will be advertised so that workers are aware of it and are encouraged to use it without being intimidated or targeted for negative feedback. Workers may also lodge their grievance in writing or verbally through the Environment, Social, Health and Safety Officer of the Contractor or to the Supervising Engineer.

Details of cases resolved shall be forwarded to the PCU for recording and reporting purposes. Cases that are not resolved at this level, are escalated to the district level GRC. The Contractor is responsible for ensuring that all minor complaints are dealt with and resolved directly without any undue delays. When an aggrieved party is not satisfied with the outcome from management, the party can be advised by the Social and Gender Specialist to take further actions specified in GRM.

Forms of appeal

The Courts of Sierra Leone: If the aggrieved party is not satisfied with the outcomes from the above stages, the party has the right to go to the judiciary at their own expense. It is anticipated that the number

of cases, which may need to be referred for redress will be relatively small and that only the first and second steps of the redress mechanism may need to be activated.

Alternative Dispute Resolution: There are risks that activities under component 3 involving demarcation and recording of land rights could lead to:

conflicting property boundaries between third parties;

reveal an overlap of rights and generate contesting claims;

land boundary contestations between village lands or neighboring communities; and

encroachments on the boundaries (housing areas, agricultural areas, pastoral areas, etc.);

These risks require an adequate GRM and Alternative Dispute Resolution (ADR) process alongside participatory survey and recording activities with landholders, land users, neighbors, community groups and land committees to ensure transparency in the demarcation and registration of customary lands. The Alternative Dispute Resolution mechanism for land conflicts will be encouraged by the PCU in case of land disputes arising as a result of the project activities. The PCU with the support of the Social and Gender Specialist should play an advisory role should there be a land ownership conflict between parties resulting from project activities. The parties would be encouraged by the PCU to seek Alternative Dispute Resolution (ADR) mechanisms instead of court actions. However, the decision to either go direct to court or adopt ADR is solely the prerogative of the parties involved in the matter.

Arbitration through Judicial System: Parties are not required to consider or attempt ADR. However, the judicial process has always encouraged alternative dispute resolution during litigation. At any stage of a legal action, parties can enter into consent judgments i.e., the parties reach an agreement in settlement of part or all of a claim in writing, and the same is submitted to the court which enters it as a judgment of the court.

Chieftaincy-based community dispute resolutions: This form of arbitration is useful in the provinces, and is activated once a conflict has escalated to the point where the individuals or groups involved believe they can no longer resolve the dispute themselves. While the chiefs may not always be able to address the underlying issues or root causes of the dispute, they can assist in providing a form of arbitration.

Local Court System: Local courts exist at the level of Chiefdoms. This is a government-run local court, headed by a Court Chairman, appointed at the recommendation of the Paramount Chief of the Chiefdom. This court system enhances the decision-making of chiefs around land ownership and other issues.

Monitoring and Reporting

Every effort will be made to keep the project stakeholders and beneficiaries informed regularly on all project activities, with the aim to promote transparent information sharing and access to information. It

is believed that through this, grievances arising from project implementation will be minimized. The PCU shall develop a communications strategy through which the project will publicize the existence of the GRM in line with the Stakeholder Engagement Plan (SEP), its procedures, beneficiary service standards and the levels at which different types of grievances, concerns, complaints, and questions should be addressed. The communication strategy will also guide community engagement and will complement and play a facilitation role with respect to the stakeholder engagement plan. The primary target for the communications strategy will be all project stakeholders and beneficiaries.

The PCU shall include a section in its quarterly, semi-annual and annual reports on the cases received and addressed by the GRM and also, a general assessment of the GRM for the project. In addition to data and information from the GRM Register, the effectiveness of the GRM, shall be obtained, through the following measures:

During the social audit open meetings, project beneficiaries/stakeholders shall discuss the

effectiveness of the grievance handling system and provide suggestions on how to improve it.

During Project monitoring visits, the PCU technical staff shall assess the functioning of the

grievance handling system by reviewing the GRM in terms of its functionality.

The PCU quarterly and annual reports on GRM shall include:

Qualitative data on number of received appeals (applications, suggestions, complaints, requests, positive feedback), related to the World Bank's Environmental and Social Standard 10, dealing with Stakeholder Engagement and Information Disclosure, as well as the management of grievances and number of resolved appeals;

Quantitative data on the type of appeals and responses, issues provided and remained unsolved;

Level of satisfaction by the measures (response) taken;

Any correction measures taken

Feedback received from GRM will be used to generate additional training needs, improve safeguard mechanisms, identify vulnerable groups, and increase synergies with implementing partners.

Key Stakeholders Roles and Responsibilities in the GRM Process

Specific roles and responsibilities of key stakeholders in the GRM Process are outlined in the table below:

Actor	Role
MLHCP	Provides implementation oversight of Government of Sierra Leone and other Donor Partners on the SLLAP funding
Social and Gender Specialist	Receive, acknowledge and refer complaints pertaining to the project and coordinate training and sensitization of communities, focal persons, GRCs, contractor/consultants, etc.
Focal Persons	Receive complaints and forward to the Social and Gender Specialist

Actor	Role
PCU	Responsible for project management including social and environmental issues on project
National Lands Commission	Handle General land issues through its structures (National Lands Commission, District Land Commission, Chiefdom Land Committees (incl. Land Adjudication Tribunals) and Village Area Land Committees
NGO/Partner	Appropriate partners/NGOs with capacity to provide the necessary technical backstopping to project implementation process
Civil Society Organizations (CSOs)	Assist with monitoring of GRM and provide advice as needed about land related disputes
Local councils/Ward Committees/Chiefdom Committee	WCs will be responsible for community mobilization, facilitating community planning, support community level grievance uptake & other community capacity building initiatives to support project implementation
GRM Committees	Chiefs, Councillors, Religious Leaders, and representatives of PAPs shall handle grievances in accordance with local and national laws and procedures
Police/Judiciary	Appropriate police/judiciary body with capacity to receive/record/log/document, re-investigation and resolve all SLLAP related complaints when resolution fails at the first level.
Central Level GRC	The GRC will meet at least every six months to resolve strategic issues affecting the Project execution, provide policy guidance, and review project implementation progress and results indicators
Contractor/supervising consultants	Contractor will be obligated through contractual clauses to make available a GRM for workplace and community complaints. The PCU will ensure this is established while making the project GRM channels available at the site level for workers to escalate complaints. The contractor and supervising consultants will maintain a staff at the site level for management of community complaints.
GBV service provider NGO	Ensure provision of services and referrals of reported cases. Manage GBV reported cases. Liaise with GRM committees on GBV cases. Facilitate trainings for focal persons and GRM committees regarding GBV case management and reporting

Annexes

Annex 1. Budget for the Implementation of SLLAP GRM

No.	ACTIVITY	QUANTITY/ NO. OF TIMES	OUTPUT INDICATOR	RESPONSIBLE PERSON/S	AMOUNT ($)
1	Setting up GRM Committee at district level and identify Field Teams Focal Points in all Project communities	**1**	list of GRM Committees established and focal points identified	Social and Gender Specialist	20,000
2	Monitoring of GRM Functionality and quarterly meetings with GRM Committee members and focal points within communities in the various project sites	**4**	Number of Monitoring visits made and minutes of quarterly GRM Meetings held, and Reports submitted	Social and Gender Specialist, M&E Specialist	25,000
3	Hire GBV Service Provider to supervise and provide technical support for the implementation of SEA/SH Action Plan Contractor fee	**1**	Service provider supported the implementation of SEA/SH Action Plan.	Social and Gender Specialist, PCU	150,000
4	Strengthen coordination and collaboration with relevant GBV actors in Sierra Leone	**6**	Number of strategic decisions supported by SLLAP	Gender and Social Specialist	8,000
5	Establish a toll-free line and WhatsApp number to report grievances.	**1**	Number of cases reported through toll-free calls and WhatsApp messages	Social and Gender Specialist	12,000
6	Translation of key parts of the GRM & GVB/SEA/SH into audio versions in 5 local languages - Fees	**1**	Number of translations made	Social and Gender Specialist, Community Engagement and Communication Specialist	30,000
	Monthly radio discussion programmes	**12**	Number of radio discussion programmes held		

7	Train Field Teams GRM focal points and District level GRCs committees across the country on the operation of the GRM and SEA/SH	**5**	Number of focal persons and District GRCs trained on the operation of the GRM	Social and Gender Specialist GBV Specialist	25,000
8	Develop IEC Materials (Flyers, bid Board, Sign Post) for Popularization of the Project GRM	**12**	Number of IEC material produced and disseminated	Social and Gender Specialist, Community Engagement and Communication Specialist	30,000
	Total				**300,000**

Grievance Receipt Form

Instructions: All grievances shall be lodged using this form. To be completed (in duplicate) by complainant (or on behalf of a complainant if not literate) and submitted to the Project Grievance Committee in the community (with duplicate given to the complainant).

1. Name of Complainant (PAP)(code*)
   _____
2. Anonymous: yes/no
3. Address of Applicant_____
   __
   _____
   _____
4. Application date_____
5. Name of person receiving grievance
   _____
6. Position of person receiving grievance
   _____
7. Type of grievance_____
   ___
8. Details of grievance_____
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Annex 3. Grievance Closeout Form

Instructions: This form shall be completed (in duplicate) and filed (with duplicate given to the complainant) by the GRM Focal Point in the PCU to closeout all grievances.

1. Detailed evaluation of the case----------
2. Possible corrective actions determined and discussed with complainant ----------
3. Corrective steps taken----------
4. Timeframe for completion----------
5. Responsible agent/agency implement----------
6. Acceptance by complainant:

    a) I ---------- accept the corrective measures proposed to remedy my grievance.
    b) I ---------- do not accept the corrective measures proposed to remedy my grievance.

7. Additional corrective measures----------
8. Acceptance by complainant:

    a) I ---------- accept the corrective measures proposed to remedy my grievance.
    b) I ---------- do not accept the corrective measures proposed to remedy my grievance.

GRM Focal Point:

Name_____ Date_____
Sign_____

Stakeholder Meeting Pictures

Freetown

Consultation with the Director of Planning and Research - SALWACO

Consultation with the Senior Hydrologist & GIS Officer – National Water Resources Management Agency

Consultation with the Deputy Commissioner Labour & Employment – Ministry of Labour and Social Security

Consultation with the Programme Manager – National Commission for Persons with Disability

Consultation with the Director – Sierra Leone Land Alliance

Consultation with the City Engineer – Freetown City Council

Consultation with the Chief Fire Officer – National Fire Force

Bo City

Consultation with representative – ESO & Gender Office – Bo City Council, Women's Group, Disable, Youths,