SLLAP CONSTRUCTION WORK - FREETOWN SITE ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN

SIERRA LEONE LAND ADMINISTRATION PROJECT (P177031)

JULY 27, 2025

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1 EXECUTIVE SUMMARY

This ESMP is for the construction and operation of a four-story administrative building to house the National Land Commission Head Quarter in Freetown as part of Component 1 of the Project. The objective of this is to enhance operational efficiency, client services, and overall functionality for land administration in the Western Areas of Sierra Leone.

The Project has 4 key 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 located within a complex of government offices in Brookfields, Freetown. The site is of 0.3746 acres of land owned by the Ministry of Lands and Country planning and will require the demolition of a single storey building and the removal of a limited number of trees. The building to be demolished contains asbestos and as such a TORs has been developed for a specialised firm/consultant to develop an Asbestos Management Plan and supervise the safe removal and disposal of the asbestos containing materials. The AMP will also include training for the PCU Environmental and Social safeguards specialist, the contractors and EPA staff. A separate ToR is being developed to support the EPA-Sierra Leone to develop Technical Guidelines and Procedures for Asbestos Management through a short term consultancy.

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	ESS8: Cultural Heritage	Freetown City Council
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		

Historically, Freetown's mean daily temperature ranges from 23.8°C to 29.9°C, with historical highs of 38.5°C and temperatures known to drop during the Harmattan season to as low as 15°C. The relative humidity level ranges 66% and 82% with an average of 3,390mm of rainfall a year.

The immediate surroundings of the Freetown site consist of government institutions, local businesses, residential buildings, and tarred access roads. Two industrial facilities, the Sierra Leone Bottling Company and Government Printing Office, are just over 100 meters away.

Emissions from light and heavy vehicular traffic along roads (paved and unpaved) and standby generators are expected to affect air quality in the area.

Like air quality, noise levels in this area are likely influenced by light and heavy vehicular traffic on roads especially during peak hours, standby generators and office / residential noise.

An Air Quality and Noise level survey was conducted in Freetown on 31st August and 4th September 2024, to provide baseline data for these parameters.

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.

Particulate dust levels (PM2.5 & PM 10) were within WHO & SLSB guidelines at both locations during both monitoring periods for both sampling locations. The low levels of particulate matter (PM) might be attributed to the wet weather conditions i.e. sampling conducted in the rainy season where dust levels are generally lower than during the dry season.

The concentrations of SO_2, NO_2 & CO were also well below the guideline set by both the WHO and SLSB guidelines for air 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. The average noise levels at both FANMP1 and FANMP2 locations were above the WHO/WBG/IFC standard of 55 dB(A) for daytime noise

There is no ground water source that is within the 100 meters of the site and as such groundwater quality has not been taken into account. Due to the proximity of the George Brook stream to the Freetown 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 physiochemical analysis indicates that while some parameters are within the WHO standards, pH, ammonia, manganese, potassium, sulphite and chromium are outside the standards. Bacteriologically the source is polluted with e-*coli* and faecal bacteria.

As of recent estimates, Freetown's population represents 15% of Sierra Leone's total population and 70% of the Western Area's population. The city's demographic profile includes approximately 49% males and 51% females, with an average household size of 3.9. The population density is very high, averaging a density of 1,826.6 persons per square kilometre. Freetown boasts the highest literacy and school enrolment rates in Sierra Leone, with 86% of the population aged 15 and above being literate. Freetown's healthcare infrastructure includes key facilities such as Connaught Hospital, along with various clinics and pharmacies throughout the city. Despite these resources, the city faces significant health challenges, including inadequate infrastructure and high rates of infectious diseases like malaria, tuberculosis, HIV/AIDS, and cholera. Environmental issues, such as poor waste management and flooding, further exacerbate these public health concerns.

In terms of ecology the site hosts no fauna or flora of note and is about 40m from the George Brook stream, a polluted urban waterway.

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, waste management, managing the risk of soil and water pollution and ensuring the workforce is educated in the critical areas of GBV/SH/SEA and similar social safeguards. The exception to this would be the need to safely remove and dispose of asbestos containing material used as roofing materials of a building that will be demolished to make space for the new SLLAP Administrative Building. As this is a specialised activity a TOR has been developed for the development of an Asbestos Management Plan to guide the safe handling of the asbestos containing materials.

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.

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 construction and those inherent to Sierra Leone's social dynamic such as the risk of GBV/SH/SEA. Economic resettlement will be required for several food and drink vendors that have been identified and engaged by the Project. A Resettlement Policy Framework has been developed to guide the resettlement process.

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, etc. The cost of implementing this ESMP is estimated at $117,000.

2 INTRODUCTION

2.1 PURPOSE OF THE ESMP

This 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 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 eleven in-person interviews of five (5) men and six (6) women 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 offices and the nearby George Brook Stream Seven key stakeholder interviews were conducted at the national level including the Environment Protection Agency, Freetown City Council, National Council for Disability, the National Fire Force, the National Water Resource Management Agency, Sierra Lone Water Company and the Ministry of Employment Labour and Social Security.

Literature reviews and key stakeholder interviews 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 Association (IDA) grant and implemented through various components, which are briefly described below.

2.3.1 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 Information and Communication Technology (ICT) equipment and establishing appropriate 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 i.e. Bo, Makeni, Kenema, and Port Loko cities.

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

The following activities are expected:

a) Identifying, clearing and disposing the asbestos containing material from an onsite building that requires demolition

b) Very limited clearing of vegetation and trees for construction work;
c) Excavation, earth moving and clearing;
d) Disposal of construction wastes, fuel oils and other chemical wastes;
e) Transportation of equipment and materials to the sites involving medium to heavy-duty trucks carrying loads to the various construction sites;
f) Electrical, water and other installations;
g) Complete fencing of the facilities-block and steel reinforcement to increase the height and strength of the fence;
h) construction materials including local and imported materials like cement, steel rods, timber, sand, aggregate/granite, and water;
i) sand, granite/aggregate and water;
j) creation of temporary on-site facilities

2.3.3 Sub project Location

The National Land Commission (NLC) headquarters in the Western Area of Sierra Leone will be constructed in Freetown. This project site covers a flat area of approximately 0.3746 Acres (1516sq. m) in New England Ville, Freetown and will house the four level, 2088sq. m headquarters of the NCL. The ground level footprint of the structure is 511 sq. m. The surrounding area is within one of the main government office clusters in Freetown and there are many government buildings and other offices within 100 meters of the proposed site. Currently, the site is home to two structures utilised by the survey wing of the Ministry of Lands and Country Planning namely: a two-storey concrete building and a single storey wood and concrete frame building with asbestos roofing. An adjacent structure is also used as a small storage area for beacons within the land designated for constructing the NLC headquarters. The site contains two buildings, one of which will need to be demolished for the construction of the new building, and a small informal restaurant will also be demolished.

To the immediate east is the Ministry of Social Welfare, and to the north is the 98.1 FM Radio station – Radio Democracy, an old structure used by the Ministry of Employment, Labour and Social Security (MELSS). To the immediate south, a paved road connects the surrounding areas as well as serves as a vehicular exit route from the New England Ville Complex. On the western side is an unfinished structure for the Environmental Protection Agency (EPA). The National Commission for Person's with Disability (NCPD) is also approximately 15 meters southwest of the proposed site. Other notable landmarks within 150 meters include the Ministry of Basic and Senior Secondary Education (MBSSE), the National Minerals Agency (NMA), the Ministry of Works and Public Assets (MWPA), the New England Ville Police Station, the College of Medicine and Applied Health Sciences (COHMAS) Secretariat. Furthermore, a stream originating from Upper George Brook flows in the north and northwest, roughly 100 meters from the site.

Table 1: Site Coordinates

No	Northings	Eastings
1	936666.99	693981.28
2	936688.85	693935.82
3	936735.84	693972.30
4	936719.57	694008.32

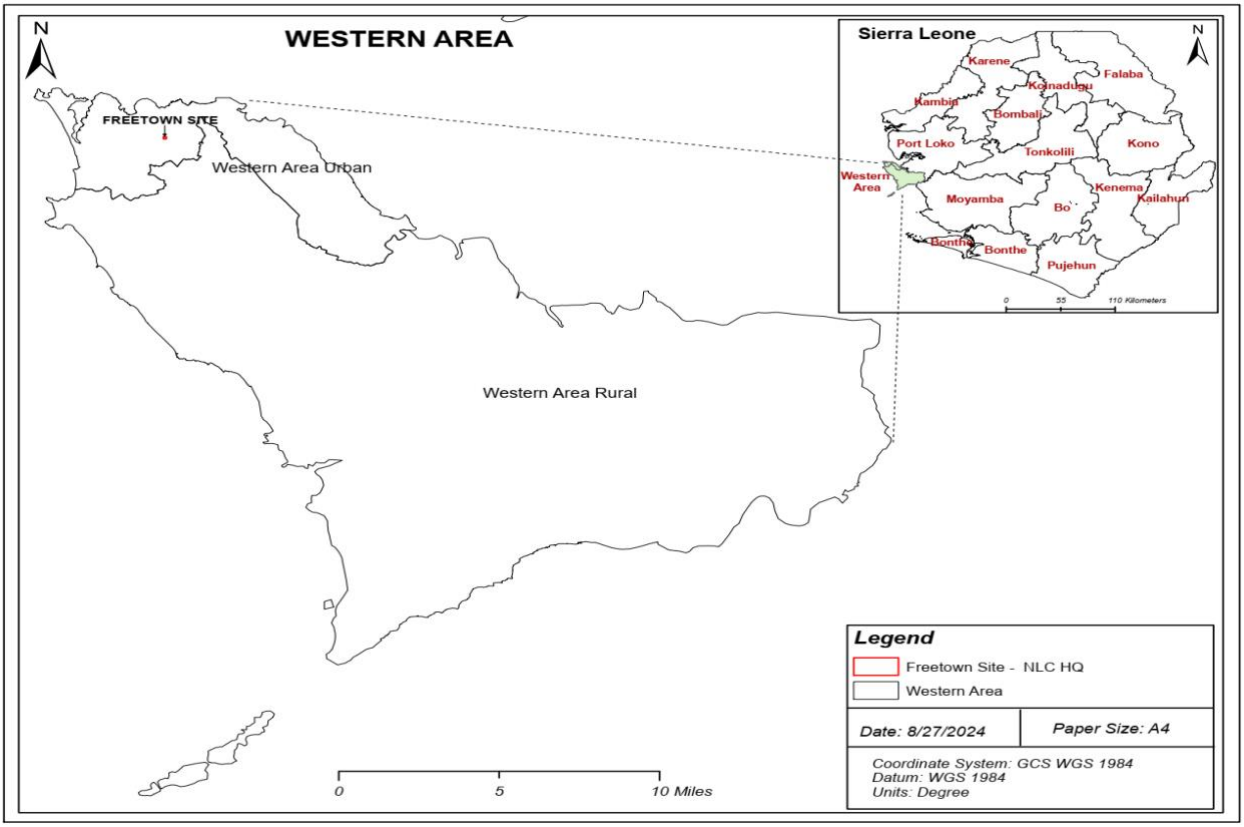

Figure 1: Location of proposed office in Freetown

2.4 SUB-PROJECT DESCRIPTION (CONSTRUCTION OF FREETOWN HQ)

Within Component 1 (Institutional Development and Legal Reform) SLLAP allocates funds for the construction of a modernized Administration Office building for the newly established NLC in Freetown 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. If these assessments uncover additional risks and impacts this ESMP will be revised and approval sought from the WB.

Presently there are site hosts two gardeners with small plots of local crops, an informal food vendor and two soft drinks vendors. These persons will need to be economically addressed prior to the start of construction activities due to loss of access to the site. The disclosed Resettlement Policy Framework allows for the harvesting of crops and compensation for economic loses. In particular, one of the affected persons, a lady who sells cooked rice to the workers in the building and nearby occupants have been provided alternative site where she can relocate during the construction period and will be provided assistance to relocate to her new place and inconvenience allowance during her relocation to the new site which is within the Ministry of Lands offices at New England. As such she will not be losing her customer base and the relocation will be very short.

Institutions surrounding the site such as the Ministry of Social Welfare, Radio Democracy radio station, Ministry of Employment, Labour and Social Security, National Commission for Persons with Disability, College of Medicine and Allied Health Sciences Secretariat and privately residences will have to be informed about the upcoming construction activities.

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 building 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 C-ESMP in line with the Bank's ESF and this ESMP detailing how it will manage the environmental, social and OHS risks and impacts during construction.

Demolition of the existing structure on the site, including a makeshift restaurant and a single storey structure with wood and concrete walls, and an asbestos roof. All rubble and debris, including hazardous materials like asbestos, will be carefully removed and disposed of according to safety and environmental regulations.

Asbestos-containing materials have been identified on the existing project location. To ensure the safe removal of asbestos-containing materials, it is imperative to conduct thorough environmental and social due diligence due to the significant environmental and health risks involved. This process should engage a contracting service to develop and oversee the implementation of an asbestos management plan, as well as a contracting service for the removal, transport and disposal of the asbestos-containing materials.

Due to the specialised nature of asbestos-containing materials removal a separate Asbestos Management Plan has been commissioned to ensure proper handling of asbestos containing roofing material. See Annex 4: TOR Asbestos Management Plan.

Figure 2: Building to be demolished and the adjacent land that was used for gardening

2.4.1.2 Construction

This will involve mobilization of people and equipment to site. Subsequent activities include earth excavation and stockpiling of excavated materials for use or safe disposal, fencing of the construction area, ground trenching. Temporal facilities such as contractor's office and storeroom will be erected to support ongoing construction work.

The construction is expected to involve a combination of heavy machinery, light equipment, and manual labour, with adherence to strict safety, environmental, and social management standards

2.4.1.3 Demobilisation and Post- Construction

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

3 LEGAL & INSTITUTIONAL FRAMEWORK

3.1 LEGAL FRAMEWORK & INSTITUTIONAL 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, which is laid out in a "checklist" prepared by EPA-SL. This has been extracted and is represented below:

Stage One – Registration

1. The applicant is required to register the project proposal/undertaking through an application process. The letter is addressed to the Executive Chairperson and copied to the Director. This is to expedite the processing of the ESIA application.

2. The Agency shall issue application and screening forms to the applicant.

3. The applicant is required to return duly completed forms together with the project proposal of the undertaking to the Environment Protection Agency Sierra Leone (EPA-SL) within fourteen days.

4. The Agency shall acknowledge receipt of the filled application and screening forms within seven days.

Stage Two – Screening

1. Project proposal, application and screening forms are screened to determine whether or not the development proposal should be subject to an ESIA and, if so, the level of detail required.

2. After the screening, the report shall be communicated to the applicant within twenty-one days from the date of receipt of the application and screening forms.

Stage Three – Scoping

1. After the project has been classified and a determination is made that the activity requires an environmental impact assessment license the proponent will be required to submit a scoping report on the project.

2. The scoping report shall set out the scope or extent of the environmental impact assessment to be carried out by the applicant and shall include draft terms of reference which shall indicate the essential issues to be addressed in the environmental impact statement on the proposed/current undertaking.

3. The Agency shall upon receipt of a scoping report examine it and inform the applicant within twenty-one days of the receipt of the report whether it is acceptable or not acceptable.

4. Staff of the Agency will visit the location of the project before the scoping report is accepted or not accepted by the Agency. *The EPA visit is known as ground truthing, the project proponent is billed for the service.*

5. The Agency will review the report within a 2-week period. On approval, instructions will be given to proceed with the main study

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

1. Upon approval of the scoping report and terms of reference the applicant is given approval by the EPA to undertake the studies.

2. Before undertaking the environmental impact assessment, the applicant shall have the responsibility to:

- Give notice of the proposal undertaking to the relevant ministries, government departments and organizations and the relevant local council;
- Advertise in at least two national newspapers and a newspaper in the locality where the proposed undertaking is to be situated; and

The applicant will ensure that copies of the scoping report are publicly available in the locality of the proposed project 3. Upon completion of the impact studies, the applicant should submit eighteen hard and soft copies of the ESIA report to the Agency for circulation to Board members, professional bodies and the public for comments.

Stage Five – Public Hearing and Review of the ESIA Report

1. The applicant shall hold two or more public hearing meetings in respect of the environmental impact statement (environmental impact assessment document) for public participation in the decision-making process.

2. The applicant should choose the date(s) and venue(s) of the public hearings.

3. The applicant should also pay for the publication of dates and venues of the public disclosure in at least two national newspapers. The Agency has no objection to this.

4. The report will be gazetted and circulated to professional organizations for comments.

5. Depending on the location of the project the applicant will be required to make announcements over the media in the local languages.

6. Staff of the Agency will also visit the site or operational areas of the project to ascertain the components and content of the ESIA Report in the review stage.

7. The draft ESIA shall be reviewed by the Agency after receipt of recommendations following a public hearing.

8. Where after review, if the draft ESIA is found unacceptable by the Agency, the applicant shall be notified of this in writing and shall be required:

- To submit a revised ESIA within twenty-one days of the date of reference failing which the application lapses, or
- To conduct such further studies as the Agency considers necessary.

Stage Six – Decision Making

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

2. The Board of the EPA is vested with the power to approve or reject an application for an ESIA.

3. Where an environmental impact assessment is acceptable to the Agency, an ESIA license is granted which shall be valid for twelve months or a term determined by the Board effective from the date of the issue of the License. The ESIA License will be subject to terms and conditions, and renewal.

4. Failure to commence operation of the undertaking within the twelve months as provided in the EPA Act, 2008 as amended in 2010 shall render the ESIA License invalid after the period.

5. When an application has been rejected by the EPA Board, the applicant has a right to seek legal redress.

To ensure compliance with this legislation the Project is required to acquire an ESIA License from the EPA prior to commencement of construction.

3.1.1.2 Other Sierra Leone legislation

This section provides a summarized list of other Sierra Leonean legislation, plans and policies that are followed.

Table 2: National Legislation

Sierra Leone Legislation	
The Constitution of Sierra Leone, 1991 *The constitution of Sierra Leone represents the governing principle of the nation* *Section 15 of the Constitution states that: "... every person in Sierra Leone is entitled to the fundamental human rights and freedoms of the individual." This includes protection from deprivation of property without compensation.* *In relation to workers' welfare, Section 8 of the constitution stipulates that the conditions of service and work for citizens are fair, and requires that "the health, safety and welfare of all persons in employment are safeguarded and not endangered or abused".*	**The Factories Act, 1974** *The Factories Act of 1974 addresses workers health and safety issues associated with factories. According to several sections of the Act, some portions of the construction process may fall within the definition of factory.* *The Act also details provisions for machine safety, safe working conditions, sanitary facilities, periodic inspections, factory registration, and guidelines for reporting injuries, accidents and industrial diseases*
National Environmental Policy of 1994 *This National Environmental Policy seeks to achieve sustainable development in Sierra Leone through the implementation of sound environmental management systems which will encourage productivity and harmony between man and his environment* *The key objective of the policy is to secure for all Sierra Leoneans a quality of environment that can adequately provide for their health and well-being.* *Several of the sectoral policies highlighted in the policy are highlighted below:* • *Air Quality and Noise;* • *Working Environment (Occupational Health and Safety);* • *Public Participation;*	**Local Government (Amendment) Act, 2004** *This Act deals with the establishment and operation of local councils around the country to enable meaningful decentralization and devolution of Government functions. It 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 Gender Empowerment & Women's Empowerment Act, 2022 *An Act to address gender imbalances by making provision for increased appointment of women to decision-making positions and structures so as to achieve at least 30% representation, to provide for the promotion of gender equality in employment and training, etc.*	**The Prevention and Control of HIV/AIDS Act, 2007** *This legislation was enacted to establish a legal framework for preventing, managing, and controlling HIV/AIDS, as well as providing treatment, counselling, support, and care for infected individuals, those affected, or at risk of infection. Section 23 establishes that discrimination of Persons Living with HIV/AIDs in terms of access to employment as an offence, while Section 11 prohibits testing for HIV/AIDS as a condition for gaining employment.*
The National Workplace HIV/AIDS Policy *The broad objectives of the policy among others, are to provide protection from discrimination in the workplace to people living with HIV and AIDS; prevent HIV and AIDS spread amongst workers; and provide care, support and counselling for those infected and affected.*	**The Child Rights Act, 2007** *Part III of the Act talks about the Employment of Children. It stipulates that only persons eighteen (18) years and above can engage in hazardous work such as civil works.*
The National Biodiversity Strategy & Action Plan (2017 – 2026) *It aligns with the 1994 Convention on Biological Diversity and the United Nations' Agenda 21 for the Rio Declaration on Environment and Development. The goal of the NBSAP is to reduce the loss of biodiversity and degradation of ecosystems across various ecological belts in the country.*	**The Employment Act, 2023** *This Act provides for the consolidation and improvement of the law relating to labour and employment, and for all the matters necessary to promote equal opportunity and eliminate discrimination in employment and occupation. The Act applies to all employers and workers in Sierra Leone, excluding armed forces and police forces, and covers all pending employment related claims. The Act covers the following matters: business; contract of employment or service; earnings; discrimination; employer; equal remuneration; national minimum wage; strike; trade dispute; violence and harassment; wage.*

3.1.2 International

3.1.2.1 World Bank Environmental & Social Standards

The planned intervention is expected to trigger the following Environmental and Social Standards (ESS) of the World Bank:

1. ESS1: Assessment and Management of Environmental and Social Risks and Impacts

ESS 1 is relevant because construction activities under the SLLAP are expected to cause some environment and social impacts through pollution, displacement or relocation of makeshift restaurants, soil erosion, waste generation, occupational and community health and safety issues, and livelihood that need to be assessed and mitigated.

2. ESS2: Labour and Working Conditions

The construction work will make use of direct workers, contracted workers, and community workers, thus making ESS 2 relevant to the project.

3. ESS3: Resource Efficiency and Pollution Prevention and Management

The construction work will result in small and diverse sources of emissions, soil and water pollution as well as the generation of waste, thus making ESS 3 relevant to the SLLAP construction activities.

4. ESS4: Community Health

The ESS 4 is relevant because it addresses the possible health and safety concerns for the nearby residents and the wider community resulting from the proposed construction activities of the SLLAP project. Additionally, there's a potential risk of increased gender-based violence due to an influx of workers at the construction site.

5. ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Even though land will not be acquired from the community or private citizens, some private citizens will lose the economic benefits gain use of the site that will host the national SLLAP headquarter office. ESS5 is therefore relevant.

6. ESS8: Cultural Heritage

ESS 8 is relevant to this SLLAP - subproject (construction of the NLC office administration building) because the potential exists for the discovery of cultural and or archaeological sites during vegetation clearance or excavation that may require the attention of relevant government agencies. Therefore, a Chance Find Procedure has been incorporated as presented in Appendix 2

7. ESS10: Stakeholder Engagement and Information Disclosure

This subproject will involve engaging various stakeholders during the design, planning, and implementation stages. ESS 10 (**Stakeholder Engagement and Information Disclosure)** will guide the SLLAP consultations and engagements. To comply with this standard, SLLAP has prepared a standalone Stakeholder Engagement Plan (SEP) and a Change Management Community Engagement and Communication Strategy

3.1.3 Compliance Hierarchy

The compliance (legal and internal) requirements associated with the interventions are defined below:

1. Compliance requirements imposed by the Sierra Leone Regulatory Framework;

International conventions and guidelines to which Sierra Leone is a signatory or with which the Project must comply. These Conventions and Protocols are at different stages of implementation but in general Implementation is slow as many have not been ratified or harmonized with the laws, policies and programmes of Sierra Leone.

Table3: 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

World Bank Environmental and Social Standards relevant to these interventions.

The project will strive to meet the Bank's requirement and the national regulations. 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 $40M 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 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 Freetown City Council

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 Freetown City Council must be consulted during the implementation and planning process.

4 ENVIRONMENTAL & SOCIAL BASELINE

4.1 CLIMATE

Sierra Leone's climate is tropical with two seasons, the rainy season and the dry season. The country has an average humidity of 40 to 90%. The rainy season commences between April and May. It runs until October and November, while the dry season begins in November and December and ends in April and May when the rain cycle begins. Daily temperatures usually vary between 25°C and 34°C. Lower temperatures are experienced during the Harmattan period, usually between December and February, when dry winds blow south-easterly from the Sahara Desert.

Historically, Freetown's mean daily temperature ranges from 23.8°C to 29.9°C, with historical highs of 38.5°C and temperatures known to drop during the Harmattan season to as low as 15°C. The relative humidity level ranges 66% and 82% with an average of 3,390mm of rainfall a year.

4.2 AIR QUALITY & NOISE QUALITY

The immediate surroundings of the Freetown site consist of government institutions, local businesses, residential buildings, and tarred access roads. Two industrial facilities, the Sierra Leone Bottling Company and Government Printing Office, are just over 100 meters away.

Emissions from light and heavy vehicular traffic along roads (paved and unpaved) and standby generators are expected to affect air quality in the area.

Like air quality, noise levels in this area are likely influenced by light and heavy vehicular traffic on roads especially during peak hours, standby generators and office / residential noise.

An Air Quality and Noise level survey was conducted in Freetown on 31st August and 4th September 2024, to provide baseline data for these parameters.

Table 3: Air & Noise Monitoring Location

Location	ID	Description	Eastings	Northings
Freetown	FANMP1	Northeast of the site (approx. 20m from 98.1 FM)	694047	936713
Freetown	FANMP2	In front of COHMAS Secretariat, Approx. 70m from the site	693894	936719

Figure 3: Map of Air and Noise Monitoring Points

Figure 4: Noise & Air Quality Monitoring

4.2.1 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.

Table 4: Air Quality Levels

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
31/9/24	11:30 – 12:30	FANMP1	6.3	15.7	14.7	9.2	175
31/9/24	14:20 – 15:20	FANMP2	7.1	17.2	12.8	13.5	189
4/10/24	10:20 – 11:20	FANMP1	6.8	17.8	14.1	9.3	201
4/10/24	15:40 – 16:40	FANMP2	7.4	18.5	13.4	9.2	231

Particulate dust levels (PM2.5 & PM 10) were within WHO & SLSB guidelines at both locations during both monitoring periods for both sampling locations. The low levels of particulate matter (PM) might be attributed to the wet weather conditions i.e. sampling conducted in the rainy season where dust levels are generally lower than during the dry season.

The concentrations of SO_2, NO_2 & CO were also well below the guideline set by both the WHO and SLSB guidelines for air quality.

4.2.2 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 **Error! Reference source not found. Error! Reference source not found.**).

Table 5: 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)
31/9/24	11:30 –12:30	FANMP1	56.8	46.3	62.7	55
31/9/24	14:20 –15:20	FANMP2	58.1	47.8	79.8	55
4/10/24	10:20 –11:20	FANMP1	55.8	46.9	61.1	55
4/10/24	15:40 –16:40	FANMP2	59.3	43.7	81.2	55

The average noise levels at both FANMP1 and FANMP2 locations were above the WHO/WBG/IFC standard of 55 dB(A) for daytime noise. The noise levels especially the Average max figures were attributed to vehicular traffic, commercial activities, and residential interactions in the area.

4.3 HYDROLOGY AND WATER QUALITY

4.3.1 Surface Water

The Freetown site and the surrounding area drains into the George Brook Stream which is located approximately 95 meters away. The George Brook stream then flows into the Kroobay. The elevation difference between the Freetown site and the George Brook stream ranges from 64 to 47 meters.

Figure 5: Hydrological Map of Proposed Construction Site and Surroundings

Due to the proximity of the George Brook stream to the Freetown 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: Surface Water Quality Result. Drinking water guidelines published by the World Health Organisation (WHO) are utilised in the analysis. It should be noted that this is a polluted (visually) urban stream.

The physiochemical analysis indicates that while some parameters are within the WHO standards, pH, ammonia, manganese, potassium, sulphite and chromium are outside the standards. Bacteriologically the source is polluted with e-*coli* and faecal bacteria.

There is no ground water source that is within the 100 meters of the site and as such groundwater quality has not been taken into account.

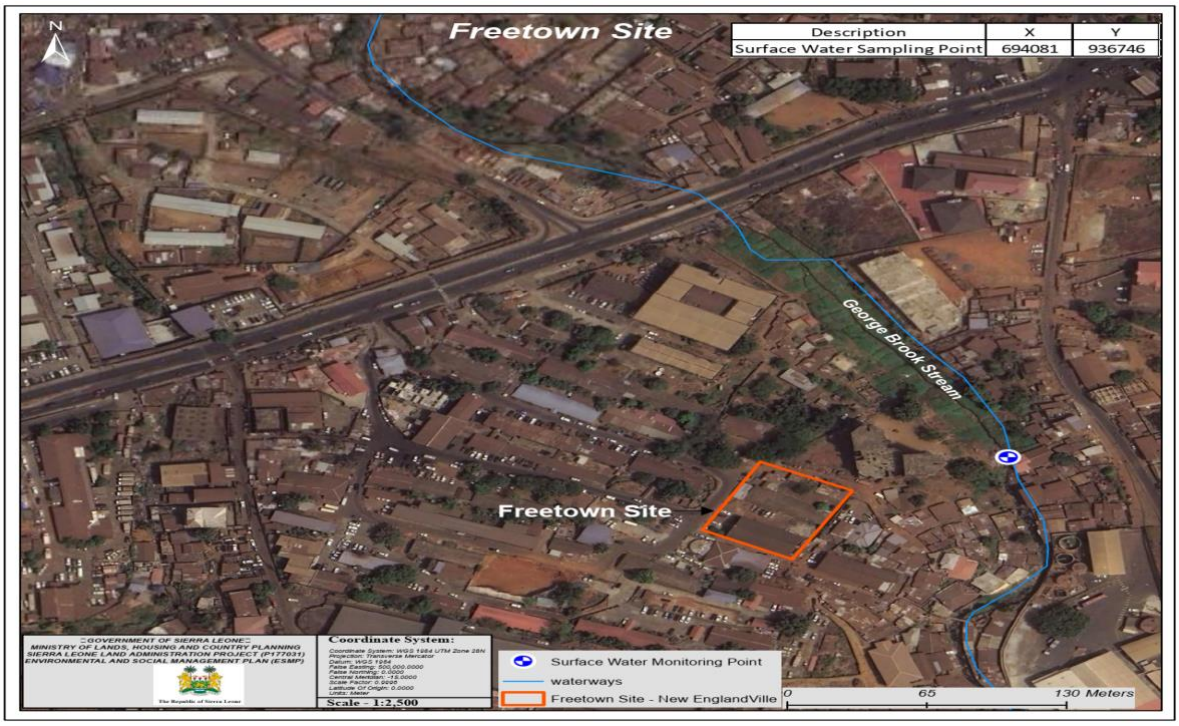

Figure 6: Surface Monitoring Point

Figure 7: Surface water Sampling

4.4 ECOLOGY

The site is a modified environment with only two trees present: *Gmelina arborea* and the Manila tamarind (*Pithecellobium dulce*).

4.5 SOCIOECONOMIC

4.5.1 Demographics

As of recent estimates, Freetown's population represents 15% of Sierra Leone's total population and 70% of the Western Area's population. The city's demographic profile includes approximately 49% males and 51% females, with an average household size of 3.9. The population density is very high, averaging a density of 1,826.6 persons per square kilometre.

4.5.2 Economy & Livelihood

Freetown serves as Sierra Leone's economic hub, contributing about 30% of the national GDP. Its economy is diverse, encompassing trade, services, manufacturing, mining, tourism, and fishing.

4.5.3 Education

Freetown boasts the highest literacy and school enrolment rates in Sierra Leone, with 86% of the population aged 15 and above being literate. The city is home to prominent educational institutions such

as the University of Sierra Leone, Njala University, and the Milton Margai College of Education and Technology. (GoSL, 2023).

4.5.4 Health and Food Security

Freetown's healthcare infrastructure includes key facilities such as Connaught Hospital, along with various clinics and pharmacies throughout the city. Despite these resources, the city faces significant health challenges, including inadequate infrastructure and high rates of infectious diseases like malaria, tuberculosis, HIV/AIDS, and cholera. Environmental issues, such as poor waste management and flooding, further exacerbate these public health concerns.

Food security in the region reveals that a significant portion of the population experiences moderate to severe food insecurity, with many households facing challenges related to food consumption and dietary diversity.

4.5.5 Gender Based Violence

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. Freetown has a significantly higher level of lifetime GBV occurrence than the national average at 67.6% with 54.9% within the preceding 12 months.

4.5.6 Land Tenure and Ownership

In Freetown, lands are held under freehold ownership under statutory regulations unlike the provinces where most lands are communally held under customary law. Residents in and around the site and Freetown in general will be owner or renters of the structures in which they reside.

The Government of Sierra Leone owns land in various municipalities such as Freetown under statutory regulations. These lands include the site for the construction of the SLLAP Freetown office.

4.6 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. Eleven (11) community respondents were targeted.

4.6.1 Demographics

Table 6: Demographic Characteristics of Respondents

Category	Group	n	%
Sex of Respondents	Male	5	45.5
	Female	6	54.5
Age Category	15 ≤ 25 years	4	36.4
	25 ≤ 45 years	6	54.5
	> 45 years	1	9.1
Marital Status	Single	6	54.5
	Married/Cohabiting	5	45.5
	Widowed/Separated	0	0.0
Educational Level	No formal education	1	9.1
	Primary	2	18.2
	Secondary	4	36.4
	Tertiary	3	27.3
	Islamic	1	9.1
Current Employment Status	Employed (informal)	5	45.4
	Employed (formal)	2	18.2
	Unemployed	3	27.3
	Student	1	9.1
Faith (Religion)	Muslim	8	72.7
	Christian	3	27.3
Duration of Stay in Community (years)	1-5	6	54.5
	6-10	2	18.2

	Above 10	3	27.3
Type of Dwelling	Zinc House/'Pan body'	4	36.4
	Cement Flat/Apartment building (Unfenced)	6	54.5
	Mud House/Dirt block + Zinc roof	1	9.1
	Other	0	0.0
Average Monthly Earnings	< 600	3	27.3
	600 - 2,500	4	36.4
	2,501 - 5,000	2	18.2
	5,001 - 7,200	1	9.1
	> 7,200	1	9.1
Household Size	1-3	2	18.2
	4-5	5	45.5
	Greater than 5	4	36.4
Vulnerable Family Member	Yes	0	0.0
	No	11	100.0

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

From the field visit conducted and residents within the 100m radius from the Freetown site boundary, a diverse demography of individuals were surveyed, 45.5% were male, and 54.5% were female. Age distribution amongst respondents includes 36.4% in the 15-25 age group, 54.5% in the >25 - 45 age group, and 9.1% in the > 45 years old respectively. Marital status shows that 54.5% were single, while 45.5% married or cohabiting. Notably, no respondents were widowed/separated.

4.6.3 Housing and Income

The housing conditions in the surveyed community varied significantly. The majority of respondents (54.5%) lived in cement flats or apartment buildings, which were typically unfenced. About 36.4% resided in zinc houses, also known as 'pan bodies,' and a small fraction (9.1%) lived in mud houses constructed with dirt blocks and zinc roofs. Regarding income, the respondents' monthly earnings showed considerable diversity: 27.3% earned less than SLe 600, 36.4% earned between SLe 600 and 2,500, 18.2% earned between SLe 2,501 and 5,000, and 9.1% each earned between SLe 5,001 and 7,200, and above SLe 7,200. The community surrounding the site (within 100m) are a mix of urban and peri urban housing. Typical with urban centres especially Freetown community social cohesion is relatively low and lacks most of the traditional structures that bond rural communities.

4.6.4 Education and Employment

Educational attainment among the respondents was diverse with 9.1% of respondents having no formal education. Primary and secondary education marks at 18.2% and 36.4% respectively, whilst tertiary education is accounted for by only 27.3%.

Employment status varied, with 45.4% employed in the informal sector, 18.2% in the formal sector, 27.3% unemployed, and 9.1% were students. This distribution reflects a significant portion of the workforce engaged in informal employment, with a smaller segment in formal employment.

4.6.5 Health, Water and Sanitation Issues

Table 7: Health, Water and Sanitation Issues of Respondents

Category	Group	n	%
Health	Malaria	11	100
	Typhoid	9	81.8
	Cold/Flu	9	81.8
Sources of Drinking Water	Pipe borne water	5	45.5
	Sachet	1	9.1
	Well	4	36.4
	Others (stream, river, rain)	1	9.1
	Yes	5	45.5

Experience of health-related problems from drinking sources	No	6	54.5
Access to toilet facilities	Yes	8	72.7
	No	3	27.3
Waste Disposal Methods	Throw away in either waterway or an open space	5	45.4
	Burning	2	18.2
	Paying waste collectors	4	36.4

Health
Malaria (100%) is the most commonly reported illness in the community, followed by typhoid and cold/flu, both at 81.8%. 45.5% of respondents have experienced health-related problem such as including diarrhoea due to their drinking water sources, while 54.5% have not reported any such issues.

Sanitation
70% of the respondents have access to some form of toilet facility. Most notably, respondent waste disposal methods included 45.4%, throw away in either waterway or an open space, 18.2% burning and 36.4% paying waste collectors to dispose on behalf of their households.

Water Sources
The primary sources of drinking water for respondents include pipe-borne water (45.5%), wells (36.4%), and sachet water (9.1%).

4.6.6 Perceptions of the SLLAP Project

Respondents reflect a mix of optimism and concern. While majority view the project as positive step, recognizing its potential to contribute to sustainable development, improve local infrastructure and create jobs, there are notable worries. Specific issues expressed include noise and vibrations, with suggestions to adjust work hours, proper handling of asbestos, minimizing dust and noise for health protection. Despite these concerns, respondents are hopeful about the project's benefits and the proposed mitigation measures to be developed for all impact.

5 POTENTIAL ENVIRONMENTAL & SOCIAL IMPACTS

This section discusses the positive and negative impact of the interventions on the natural environment, society and the workforce during the pre-construction, construction, decommissioning 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 Environment

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 NMA-SL, MELSS, FM 98.1 radio, NCPD, MWPA, MBSSE, EPA Building under construction, SLBC, the George Brook Stream/swamp and approximately 30 residences and 63 people. Furthermore, it also includes the access route to the site used by construction vehicles.

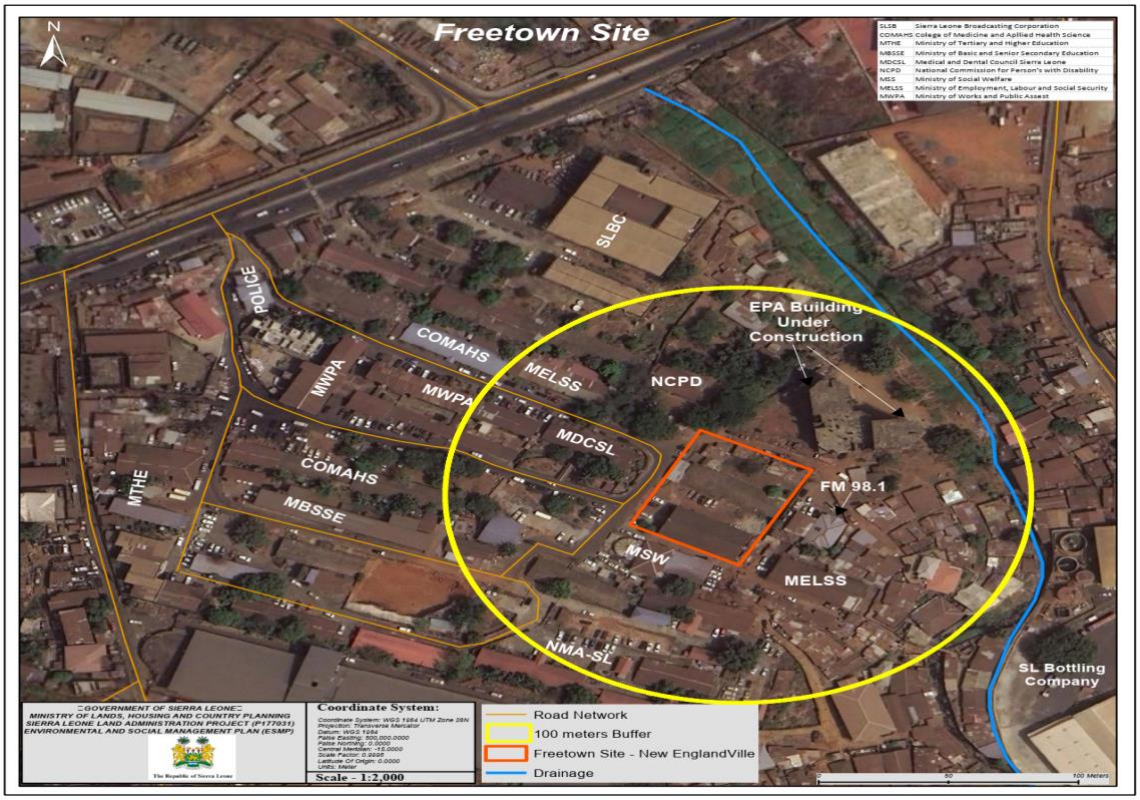

Figure 8: Project Area of Influence

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

Institutional

The following are major institutions involved with or having influence on the proposed construction project:
- Ministry of Land, Housing and Country Planning
- Freetown City 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.

Error! Reference source not found. presents the coding for measuring potential Impact significance. A c olour 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 8: 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 Freetown.	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 Western Area of Sierra Leone, residents near the site, local food vendors, the Western Region 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, offices	

5.4 NEGATIVE IMPACTS

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
PRECONSTRUCTION PHASE					
1	Setting out of construction site, demolition of existing structures in the site to make way for the NLC HQ building; fencing the site to protect the public from potential risks, such as demolition and construction debris and heavy machinery: and setting out (positioning) of site office, store/materials yard and equipment.	Disturbance and release of asbestos fibres Health risks to workers and community	❖ Increase in incidents of lung diseases such as asbestosis, diffuse pleural thickening, lung cancer and mesothelioma. ❖ Contamination of surrounding environment with asbestos fibres (air, soil and water)	Construction workers, community members and the environment (air, soil and water).	High
		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
		Visual Impact	Erecting hoarding around the construction site may temporarily disrupt the aesthetic appeal of the area, especially in a highly visible government office zone.	Nearby Resident	Low
		Wastes Accumulation on Site	The demolition work generates 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 stacking of rubbles cut down for later disposal can pose a risk to occupational and public safety.	Site Workforce, Nearby Resident, and Wider Community	Moderate
		Air Quality Deterioration	❖ Demolition activities will release dust and particulate matter into the air, contributing to air pollution. This could pose health risks to both workers and nearby populations, especially those with respiratory issues.	Site Workforce, Nearby Resident, and Wider Community	Low

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			❖ Equipment used for demolition work may generate dust, emissions, and particulate matter which may deteriorate air quality and cause respiratory issues in the surrounding area.		
		Noise Pollution and Vibration	The demolition work will generate significant noise and vibration particularly from heavy machinery such as excavators, bulldozers, and jackhammers. Noise levels may be temporary but exceed acceptable limits and disturb nearby residents and offices.	Nearby Resident, and Wider Community	Moderate
		Soil pollution, disturbance and erosion	❖ 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 George Brook Stream.	Future Horticulture Area, George Brook Stream and ecosystem, and Soil quality, and Local Environment and Ecosystems	Moderate
		Water Pollution	❖ Accidental oil or chemical spills during heavy machinery use can contaminate ground and surface water, when washing off by heavy rain. ❖ Eroded material from site can also migrate into the stream during heavy rains.	George Brook stream ecosystem	Moderate
		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	Site Workforce	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			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 workplace 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		
		Clearance of rubble within the project site for the footprint of the design main layout, and associate facilitate.	❖ 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 Resident and Wider Community	Moderate
		Loss of livelihoods	❖ Loss of economic benefit from; ➢ Selling food and drink at the site ➢ Cultivating local plants and vegetables at the site	Nearby Residents	Moderate
	CONSTRUCTION PHASE				

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
		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 George Brook stream. ❖ Soil contamination due to accidental release of hydrocarbons or chemicals from machinery usage. ❖ Loss of topsoil may affect the quality of soil for future horticulture in the area.	George Brook stream ecosystem, and Soil Environment	Moderate
		Water Pollution	❖ Washing off accidental oil/chemical spills during heavy machinery use can lead to contamination of the George Brook stream, when wash off by heavy rain. ❖ Erosion of soil leading to George Brook stream sedimentation during heavy rains. Hence, this leads to degradation of the quality of George Brook stream	George Brook 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:	Nearby Residents, Site Workforce, George Brook stream ecosystem, Soil Quality, and Aesthetics	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			• pollution and create a breeding ground for pests, which can then spread disease. This can also lead to deterioration of the air and pollute George Brook 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.		
		Occupational Health and Safety	❖ Improperly stacking of rubble 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. ❖ 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.	Site Workforce and Visitors	High

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
		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 George Brook 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
		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 George Brook stream sedimentation in during heavy rains. Hence, this leads to degradation of the quality of George Brook stream		Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			❖ Sediment run-off, oil/chemical spills during excavation and levelling, especially during heavy rain, can contaminate the George Brook stream and groundwater.		
		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 George Brook 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 George Brook 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 a hazardous to workers. ❖ 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	Workers at the construction site	High

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			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 George Brook 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 finishing works such as joinery, glazing, wall and floor finishes, and installation of furniture and equipment.	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 cement, use of concrete mixer using a batch plant, and other machinery and equipment used in the site. ❖ Dust generation along unpaved delivery routes.	Nearby Residents and Offices, Site Workforce	Low
		Noise Pollution	Construction activities involving use of power tools and equipment, and other machinery use can	Nearby Residents and Offices, Site Workforce	Low

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			potentially create intermittently high levels of noise that may cause disturbance to workers, nearby residents, and offices.		
		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 from which may lead to contamination of the: ▪ George Brook 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 George Brook stream.	George Brook 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;	Ground Water, Soil Quality, George Brook stream ecosystem	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			iii. accidental oil and chemical spills or leaks.		
		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.	Nearby Residents, offices, and wider community	High

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			❖ 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. ❖ Contamination of the George Brook 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 George Brook stream will result to water pollution thereby affecting the aquatic ecosystem.	Nearby Residents, offices, and Site Workforce, and wider community	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			❖ Improper disposal of excess fertilizers or chemicals used in landscaping can lead to water pollution if they wash off into George Brook stream. ❖ Poor aesthetics arising from wastes generated and the unpleasant odour.		
		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
		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, Nearby Residents, offices, and wider community	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 George Brook stream during heavy down pour of rain.	Nearby Residents, offices, and Site Workforce, and wider community	High

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
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 workplace 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. ❖ Violation of human rights of workers.	Contractor, Workforce, Vulnerable groups (Women and person living with HIV/AIDS)	Moderate
		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	Site Workforce, Nearby Residents, and offices	High

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
			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.		
		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 and Wider Community	High
		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				

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
	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 ❖ Temporarily 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 George Brook 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
		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 Freetown	Unsafe Consequence along parking lots and sidewalk	❖ 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 George Brook stream.	George Brook stream quality, Aquatic Ecosystems of the	Moderate

No	Project Activity	E&S Risks	Potential Impact	Key Receptor (s)	Significance
		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 George Brook stream ecosystem	Moderate
		Universal Access	Limited access to the NLC complex in Freetown for persons disabilities.	Persons with disabilities	Moderate
		Traffic Obstruction	NLC staff vehicles and public vehicles 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 Freetown currently consists of two trees, a *Gmelina arborea* and a Manila tamarind (*Pithecellobium dulce*). The land also contains two buildings used by the Ministry of Lands, one of which will be demolished for the subsequent construction of the NLC office. Land use change will be extremely limited. There are also two temporary structures and one of them is used by a woman for selling food to the workers in the building and around the area. Another woman is selling drinks and some small items. In addition to these two women, there are couple of other ladies selling drinks, who sit on the corridor to the small stores where the land ministry officials store their beacons. Impact on vendors are expected to be short term as there is sufficient space within the wider government complex for their businesses to be relocated, Potato leaves are grown on the site by one individual following a pattern of cultivating on the low lands at the height of the dry season (closer to the nearby George Brook Stream) and cultivating in the highlands (the construction site) during the rainy season.

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 stormwater management strategies to manage stormwater 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.
- Assess and compensate any PAPs found to still have any crops by the time the site is handed over to the contractor and if the PAPs are still gardening in the area. This is highly unlikely after December as all the crops would have been harvested and the land not suitable for growing crops in the dry season. Implement RPF developed for the construction of the SLLAP offices.
- Food and drink vendors will be supported to move their businesses to other locations within the government complex with the aim of ensuring that they can continue their economic activities with minimum disruptions. Economic assistance will also be provided to the vendors as compensation for disruptions caused.

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.

- Manage asbestos containing materials as per the standalone asbestos management plan to be developed by the project.

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 residents 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.
- Workers should be trained on proper procedures for handling snakes found on the site.
- 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 Asbestos Containing Materials (ACM)

The management, handling and disposal of asbestos containing materials from the one storey building to be demolished for the construction of the NLC Headquarter shall be guided by an Asbestos Management Plan (AMP) see Annex 4: TOR Asbestos Management Plan

The AMP shall:

- Be prepared in accordance with World Bank ESF, EHS guidelines and national laws such as the EPA Act, 2022, The Factories Act 1974 and relevant guidelines.
- Require approval, monitoring and supervision by EPA or the appropriate authority from planning to disposal of the asbestos materials;
- Be strictly implemented. Work cannot procced without the AMP,

- Identify options for disposing of the asbestos containing materials taking into consideration the options available in Sierra Leone
- Identify a dedicated disposal facility or section within an existing facility for the ACM,
- Identify asbestos-specific PPE for workers involved in the demolition exercise, and;
- Indicate that the demolition area will be cordoned off over a safe distance during the entire period.

6.1.8 Water Resources

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

6.1.9 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.

6.1.10 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 George Brook stream, and percolation into the underground water table.

6.1.11 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.

6.1.12 Occupational Health and Safety

- The contractor will develop a C-ESMP in compliance with this ESMP, national legislation and Bank ESFs which will include OHS management.

- The contractor should recruit an occupational health and safety officer to manage, document, and report all health and safety issues on site.
- The OHSE officer should conduct weekly toolbox talks for workers on various tasks' health and safety requirements and sensitize 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.

- 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 the 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.
- Ensure fuel and oil spill kits are available and accessible.
- Refuel according to strict protocols.
- Regularly train workers on firefighting equipment operation.

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

6.1.13 Labour and Working Conditions

- 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)
- The contractor must develop and enforce a code of conduct prohibiting child and forced labour.
- 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 occupational accidents, diseases and incidents.
- Engaging the local community to build positive relationships and foster support for the project.

- Contractor provides emergency prevention and preparedness and response arrangements to emergency situations including and not limited to workplace accidents, workplace illnesses, flooding, fire outbreak, disease outbreak, labour unrest and security.
- Contractor shall maintain all such record for activities related to the safety health and environmental management for inspection by PCU or the World Bank.

6.1.14 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 Liaison Officer to support the Site Manager and OSHE officer in all matters related to relations with and the welfare and support of local communities. This person shall also be responsible for ensuring relations with the surrounding offices.
- The Liaison's responsibilities include coordinating and informing the various offices with regards to the work schedule especially disruptive (. e.g. noisy) works, informing nearby resident of works, managing expectations between affected offices and residences regarding rescheduling of nuisance work, 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, typhoid, and sexually transmitted diseases, and workers should be encouraged to abstain from sex with local people 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 to prevent GBV/SEA/SH incidents, and the contractor should implement and enforce strict codes of conduct for the workforce, emphasising 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 safety awareness programs.
    - Encourage 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 facility management (Ministry of Works) of the New England Ville Complex 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.

6.1.15 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.

The contract documents will incorporate the World Bank's "chance finds" procedure. See Annex 2: Chance find procedure

6.1.16 Ensure Security measures

- The Contractor will develop a security management plan as part of the C-ESMP
- Resolve security risks by engaging with stakeholders regularly.
- Provide day and night security guards and adequate lighting on the project site.

Table 9: Environmental & Social Management Plan Summary

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
Pre - Construction			
Disturbance and release of asbestos fibres and hence increased health risk to workers and the surrounding community This will lead to an increased incidence in lung diseases such as asbestosis, diffuse pleural thickening, lung cancer and mesothelioma. Contamination of surrounding environment with asbestos fibres (air, soil and water)	**PCU** ❖ Develop and implement an asbestos management plan approved by the World Bank o Management plan to explore available storage / disposal options for asbestos such as encapsulation in concrete then burying, shipping to appropriate facility, etc. ❖ Remove and make safe all asbestos containing materials prior to any demolition works ❖ Provision of appropriate / specialised PPE to workforce removing asbestos ❖ Provision of training to workers removing the asbestos to ensure they understand the dangers of the work they are doing and the importance of the PPE in safeguarding their health ❖ Properly wetting asbestos containing materials prior to disassembly to minimise release of fibres. ❖ Explore storage / disposal options for asbestos such as encapsulation in concrete	PCU- SLLAP /MLHCP	15,000
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.	❖ 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.	Contractor, PCU- SLLAP /MLHCP Contractor: No additional costs.	PCU E&S review will not require additional costs.

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
Site Clearance.	**PCU** The PCU should assess the makeshift food and drink vendors on the site and determine the level of impact the construction will have on them and hence the required level of resettlement i.e. economic or physical if any. All options should be explored to limit displacement to economic where possible by simply relocating the restaurants a few metres outside the construction site so the restaurants can maintain their customer base. This activity should be conducted in line with ESS5 (Land Acquisition, Restrictions on Land Use and Involuntary Resettlement).	PCU- SLLAP /MLHCP, Bank	PCU E&S: No additional cost Contractor: 20,000 5000
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. ❖ 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-	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)
	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** ❖ Incorporate OHS in C-ESMP to be approved by the PCU ❖ 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 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)). ❖ 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.	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. 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.

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ 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. ❖ 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, COVID-19, typhoid, and sexually transmitted diseases. ❖ Encourage workers to abstain from sex in local community ❖ 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, are available on site. Facilities to include constant running water. 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.		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)
	❖ 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. ❖ 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. ❖ 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). **PCU** ❖ Provide and enforce use of PPE on during site visits and inspections by PCU staff		
Risk of soil contamination 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 of George Brook Stream from construction wastes and water use on groundwater. 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 George Brook Stream ❖ Use building materials with minimal or no packaging to avoid generating excessive packaging waste.	PCU- SLLAP /MLHCP PCU E&S specialists to monitor implementation of the mitigation measures	Contractor Waste Management Contractor – 12000 (1,000/ month) Soil samples, analysis & reporting] 3,500. Water samples, analysis & reporting 3,500

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ 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. ❖ 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. ❖ Do not dispose of anything in the George Brook Stream. ❖ Use surface protection measures to control soil erosion into the 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 George Brook 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
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	PCU E&S monitoring, auditing, and

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Conduct regular environmental and social monitoring and reporting, as well as an audit of occupational, community health, safety audits, and environmental performance.		reporting 10,000
Unclear worker roles and responsibilities, including leadership and accountability among the workforce, can lead to conflicts and disputes.	**Contractor** ❖ 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 cost 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. ❖ 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).	PCU- SLLAP /MLHCP Conduct regular audits to ensure that workers are being paid on time and at the rates agreed / stipulated in their contracts	No Cost required.
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 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.	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

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Report and remediate any violations of their code of conduct. ❖ Provide education and awareness training to all employees, suppliers, and sub-contractors.		will incur no additional costs.
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 whistleblower protection is in place to encourage reporting of unethical or criminal behaviour.	PCU- SLLAP /MLHCP Ensure contractor is aware of incident reporting requirements	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)). ❖ 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.	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. PCU E, S&G Specialists' monitoring will incur no

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ 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. ❖ 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, COVID-19, typhoid, and sexually transmitted diseases. ❖ Provide awareness training to the community on preventing infection from diseases. ❖ Provide hand washing stations for workers.		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)
	❖ Ensure adequate, well maintained and clean gender segregated sanitation facilities, including handwashing stations, are available on site. Facilities to include constant running water 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. ❖ 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 George Brook 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** ❖ Contractor to include Waste Management measures as part of CESMP ❖ 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.	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]

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ 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 George Brook 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. ❖ 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 George Brook stream. ❖ Use surface protection measures to control soil erosion into the George Brook 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 George Brook stream.		3,500. [Soil samples, analysis & reporting] 3,500.

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
Impacts of air pollution (dust and emission) and noise generation from Construction Equipment, Vehicle and Machinery operation	**Contractor** ❖ Ensure strict enforcement of on-site and off-site speed limit regulations. Provide the workforce with minimum Personal Protective Equipment (PPE) as required. ❖ 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 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- SLLAP /MLHCP Investigate nuisance complaints by surrounding offices and residents Monitor implementation of the mitigation methods	Include in Contractor budget [this includes safeguard equipment and systems]. Contractor Safeguards Staffs will deliver all safeguard trainings. Contractor Cost [Air Quality sampling, analysis & reporting] 2,500. PCU E, S&G Specialists' monitoring will incur no additional costs.
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 implementation of mitigation measure	Include in Contractor budget [this includes safeguard equipment and systems].

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ Ensure awareness training is conducted on all staff on hazardous material.		PCU E, S&G Specialists' 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. 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. ❖ Restricted access to the site.	PCU- SLLAP/MLHCP Monitor implementation of mitigation measures	Include in Contractor budget.

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	❖ 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. **PCU** ❖ Ensure contractors communicate with surrounding receptors and schedules nuisance activities to limit the impact on them		PCU E, S&G Specialists' monitoring will incur no additional costs.
The use of public roads by project vehicles increases the accident rate.	**Contractor** ❖ Contractor to develop Traffic Management Plan as part of CESMP ❖ 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 safety awareness campaigns and encourage the public to report drivers not observing traffic rules.	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.
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- SLLAP /MLHCP To monitor implementation of awareness training plan	*Contractor Cost* awareness training on disease prevention by consultant 5,000

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
	PCU ❖ Review and approve awareness training plan content		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** ❖ Contactor to include security measures section as part of C-ESMP ❖ 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	PCU- SLLAP /MLHCP	Include in Contractor budget. PCU E, S&G Specialists' monitoring will incur no additional costs.
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, Freetown City 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.	❖ NLC administration should implement clear equal employment opportunity conditions that explicitly prohibit discrimination based on gender or disability.	NLC Administration	No Cost require
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 George Brook 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 all toilets 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 George Brook stream and ground water resource by pollution with sediment or accidental oil and chemicals spill, black and greywater runoff into George Brook stream.	❖ Ensure that George Brook stream does not become an unofficial dumping ground for the facility by providing adequate waste collection locations and enforcing their usage by contractor staff. ➢ Hire EPA licensed waste collection contractor to collect waste regularly to avoid overflowing waste collection containers. ❖ 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	NLC Administration 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 replaced as often. ❖ Regularly maintain your solar panels and batteries by cleaning them, checking for damage, and replacing faulty components to prolong their lifespan.	PCU- SLLAP /MLHCP NLC Administration	NLC Administration Cost

E&S Risks and Impacts	Mitigation Measures	Responsibility for Monitoring	Cost (USD)
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.	PCU- SLLAP/MLHCP 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 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 10: 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.
Freetown City Council	Freetown City Council collaborate with the PCU in the construction of the NLC headquarters 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 NGOs with 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 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/SH/SEA 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 other project safeguard documentation such as the Labour Management Plan, Stakeholder Engagement 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
- GBV Action Plan
- Traffic plan
- Awareness raising training plan

7 ENVIRONMENTAL AND SOCIAL 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

7.1 Monitoring Plan

Activity	E&S Risks and Impacts	Monitoring Indicator	Methodology	Responsibility	Phase	Monitoring Frequency	Monitoring 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 approved by PCU	Document Review to ensure C-ESMP is submitted by contractor and approved prior to construction	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 management plan, etc.	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.
Construction	Non-compliance with the environmental regulation and international best practice	❖ Percentage of environmental management system goals achieved.	Field inspection and Document review	Contractor, PCU- SLLAP /MLHCP		Throughout the Construction activity.	Include in contractor budget PCU E, S&G Specialists'

		❖ Frequency of environmental and social monitoring and reporting. ❖ Number of occupational, community health, safety audits and environmental performance audits conducted. ❖ C-ESMP approved					monitoring will incur no additional costs.
Human Resources during construction (hiring, firing, etc)	Non-compliance with local laws and Bank safeguards related to labour recruitment	❖ Construction workers have 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	Preconstruction and construction	Quarterly throughout construction.	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	Preconstruction 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 meeting the legal requirement (30% female) ❖ 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	Field inspection and	Contractor, PCU- SLLAP /MLHCP	Pre-construction	Monthly	Include in contractor budget

		disaggregated), and people living with disabilities. ❖ Number of Training/Toolbox talk on hygiene practices.	Document review		and construction		PCU E, S&G Specialists' monitoring will incur no additional costs.
Employment	Risks of child and forced labour	❖ No persons below the age of employed by contractor in line with the SLLAP Labour Management Plan (LMP) and national legislation. ❖ ID cards of all employees to be inspected during onboarding process and copies to be kept as proof.	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	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 received and resolved. ❖ Whether or not all workers have signed the GBV/SEA/SH code of conduct	Document review	Contractor, PCU- SLLAP /MLHCP	Construction	Quarterly	
Electrical installation and operations	Increased energy consumption	❖ The number of energy-saving fluorescent tubes installed.	Inspection and Document review	PCU- SLLAP /MLHCP	Construction and Operations	Quarterly	NLC Administration Cost

		❖ Number of times and duration the generator is used per month.		NLC Administration			
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	NLC Administration Cost
Construction and operations	Risk of soil and water contamination of the George Brook stream through improper handling, storage, transportation and disposal of the collected wastes	❖ 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 and Document review	Contractor, PCU- SLLAP /MLHCP	Construction & operations	Monthly	Include in contractor budget *Other Contractor cost* -Soil samples, analysis & reporting 3,500 -Water samples, analysis & reporting 3,500 PCU E, S&G Specialists' monitoring will incur no additional costs

Preconstruction 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 3,000 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 toilets and handwashing stations. ❖ Number of complaints or feedback from employees regarding the sanitation facilities. ❖ Number of awareness campaign roll out among workers regarding the importance of maintaining good sanitation practices.	Field inspection and Document review	Contractor, PCU- SLLAP /MLHCP	Construction and operations	Monthly	PCU E, S&G Specialists' monitoring will incur no additional costs.
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	❖ Inspection	PCU- SLLAP /MLHCP NLC Administration	Operations	Quarterly	NLC Administration Cost

		approved electrical are connected to solar panels					
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 material. ❖ Records of inspection of the hazardous material storage area.	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 will incur no additional costs
	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 management plans.	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
	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	Preconstruction and construction	Monthly	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	Preconstruction and construction	During Excavation Work	Include in contractor budget PCU E, S&G Specialists' monitoring 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	Preconstruction 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	Preconstruction 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 has 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 C-ESMP 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 C-ESMP 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 (C-ESMP) 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 surrounding office complex
    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 during the development of this ESMP.

Engagements included the following institutions most of which were engaged in Q4 2023:

- Environment Protection Agency
- Freetown City Council (Chief Engineer)
- Representatives of national institutions such as, Ministry of Land Housing and Country Planning, National Water Regulatory Agency, the Fire Force, Sierra Leone Water Company, Ministry of Works & Public Assets and Ministry of Employment Labour and Social Security.
- NGOs such as the National Commission for People Loving with Disability.

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 **Error! Reference source not found.**for full details of consultations.

At community level detailed interviews were held with eleven 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.

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. 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 SLLAP Grievance Redress Mechanism (GRM) is presented below.

11 BUDGET & RESOURCES

Item	Description	Estimated Cost (USD)	Timeframe
Mitigation Measures			
Waste Management	Waste collection, segregation, and disposal Asbestos removal	43,000	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
Cost of Implementing Resettlement	Meetings, valuations, compensation	15,000	Prior to construction
Monitoring Measures			
Environmental Monitoring	Air, water, soil quality testing	10,000	Quarterly
Compliance Audits and Reporting	Regular site inspections, monitoring and audits for environmental, social, OHS, etc by PCU. Preparation and submission of monitoring reports	12,000	Monthly
Capacity Development			
Staff Training	Training on ESMP implementation, OHS, GBV, waste management	10000	Monthly sessions
Total Estimated Cost		**117,000**	

Table 11: Budget

12 RELATED PROJECT DOCUMENTS

The principles of development of this ESMP lie in the requirement to highlight the mitigation measures identified in the SLLAP ESMF (i.e. the assessment of project environmental impacts) into management measures, controls and processes specific to the interventions. It draws form existing documents such as the Stakeholder Engagement Plan. Etc.

12.1 LIST OF SLLAP SAFEGUARD DOCUMENTS

The following safeguard documents have been created for the SLLAP and complement this document.

I. SLAAP Environmental and Social Management Framework (ESMF)

II. Stakeholder Engagement Plan (SEP)

III. Grievance Mechanism

IV. Gender-based Violence Action Plan

V. Resettlement Policy Framework (RPF)

VI. Labour Management Plan (LMP)

VII. Change Management Community Engagement and Communication Strategy

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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[1] 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;

Regarding children under the age of 18:

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.

[1] **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 defence.

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 WATER QUALITY RESULT

Surface Water Sample Results

NATIONAL WATER QUALITY LABORATORY

TEL 079-317-532/076332988/034242458
MINISTRY OF WATER RESOURCES and SANITATION
TOWER HILL
FREETOWN

Water Quality Monitoring Report Sheet

Water Authority:.....MLHCP- SLLAP.....
District:...W/Area..... Chiefdom:.....Town:...Freetown... Date:... 4th /09/2024.....
Sample:.SW-1...Location:...New England ville water..... Type: of Source:...Surface..... Time.....

	Parameters	Measured Values	WHO recommended Permissible Limits
1.	Water Temperature (°C)	25.7	No. Value
2.	❖ pH	5.4	6.5 – 8.5
3.	Turbidity (NTU)	2	<5.0
4.	Conductivity (µS/Cm)	197	<450 µS
5.	TDS (ppm)	97	<248ppm
6.	Salinity (ppt)	-	<0.4
7.	Residual Chlorine (mg/l)	0.0	0.3-0.5 after 30min. disinfection
8.	Aluminium (mg/l)	0.12	<0.2
9.	❖ Ammonia (mg/l)	0.4	No. Value
10.	Bromine (mg/l)	-	No. value
11.	Calcium Hardness (mg/l)	2.50	<250
12.	Copper (mg/l)	0.23	<1.0
13.	Fluoride (mg/l)	1.0	<1.5
14.	Iron (mg/l)	0.09	<0.3
15.	Magnesium (mg/l)	0.10	<200
16.	❖ Manganese (mg/l)	0.68	<0.4
17.	Molybdenum (mg/l)	0.01	0.25
18.	Nitrite (mg/l)	0.15	3.0
19.	Nitrate (mg/l)	4.0	<10
20.	❖ Potassium (mg/l)	9.5	<6.0
21.	Phosphate (mg/l)	0.3	<20
22.	Silica (mg/l)	1	<15
23.	Sulphate (mg/l)	10	<400
24.	Sulphide (mg/l)	0.00	<0.5
25.	❖ Sulphite (mg/l)	0.2	No. Value
26.	Chloride (mg/l)	2	<250
27.	Arsenic	0.00	0.01
28.	❖ Chromium	0.12	<0.05
29.	Bicarbonate (mg/l)	0.00	No. Value
30.	Zinc (mg/l)	0.00	<5.0
31.	❖ E. Coli	80	Zero
32.	❖ Faecal Coliforms	90	Zero
33.	Non – Faecal Coliforms	Nil	10
34.	Vibro-parahaemolyticus	-	Zero
35.	Salmonella sp.	-	Zero

RECOMMENDATIONS:- The physicochemical analysis of this source indicate that some of the parameters are within the WHO recommended standard for good drinking water , except for pH, ammonia, manganese, potassium, sulphite and chromium which are above their limits.

Bacteriologically, the source is polluted with e-coli and faecal coliforms bacteria

Signed:...Edward Toby.....
(Supervisor)
Date:.....6/9/24.....
SIGN E. Toby

WATER QUALITY ANALYSIS LABORATORY

TERMS OF REFERENCE
FOR
INDIVIDUAL CONSULTANT FOR THE PREPARATION OF ASBESTOS MANAGEMENT PLAN (AMP)

July 2024

1. BACKGROUND

The Government of Sierra Leone with support from the International Development Association (IDA) of the World Bank is implementing the Sierra Leone Land Administration Project (SLLAP) financed through a US$ 41.1 million grant. The proposed Project Development Objective (PDO) is to establish an efficient and accessible land administration system in Sierra Leone.

The SLLAP will be implementing those parts of the National Land Policy 2015 (NLP) that relate to Land Administration. Currently land in the provinces are administered through various customary tenure arrangements and land in the Western Area has a system that includes freehold tenure arrangements as seen in most formal systems around the world. In the Western Area, the existing systems rely on a system of registration of instruments (or deeds) at the Office of the Administration and Registrar General (OARG) overseen by the Office of the Attorney General and Ministry of Justice, with boundaries documented through a Cadastral Survey methodology described in the Land Survey Act and administered by the Director of Surveys Department within the Ministry of Lands, Housing and Country Planning (MLHCP). The new National Land Commission Act 2022 has created a National Land Commission (NLC) that will be responsible for land administration and the Customary Land Rights Act 2022 provides the procedures and rules for supporting and registering customary land rights. A new Land Title Registration Act and Adjudication Act are already being drafted to the biometric registration of land title in the country as provided for in the NLP.

SLLAP would support real estate land property markets for the both the private and public sectors. It would assist the work of real estate agents, notaries, licensed surveyors and lawyers and help build the private sector in these disciplines. It would improve the transparency and security of property rights, which would help address the use of real estate in Sierra Leone and its use for collateral and mortgage purpose. It would speed-up the real estate transaction processes and aim to reduce transaction costs as well as protecting property rights of vulnerable groups, women, and customary communities. Another focus is to improve the efficiency of state property management and would continue supporting the various real estate privatization programs in the country. Many of these goals would be supported by making real estate market information accessible through information technology and linkage with e-Government initiatives. SLLAP is implemented by MLHCP, which has established a Project Coordination Unit for the day-to-day implementation of the project.

The Sierra Leone Land Administration Project is composed of five components:

Component 1: institutional Development and Legal Reform

Component 2: Development of land Information System

Component 3: Recording and Registration of Land Tenure Rights

Component 4: Project Management

Component 5: Contingency Emergency Response Component

The project is also guided by Sierra Leone's environmental regulations especially those of the Environmental Protection Agency and other related environmental and social regulations.

The MLHCP prepared the Environment and Social Management Framework (ESMF) and Labour Management Procedures (LMP), GBV Action Plan, Environmental and Social Management Plan for the Regional Offices for the project activities in the project preparatory phase. The potential impacts (positive/negative) related to each component of the project are identified in the ESMF and LMP assessment report. The Environmental Management Plan is being prepared by an independent consultant and the report will be available for the AMP consultant.

Based on the ESMF assessment, and more importantly the fact that one of the old buildings to be demolished has some environmental and social risks associated with Asbestos containing materials, an ESMP and an AMP are recommended for the subcomponent of the SLLP project that involves the construction of the NLC office building at New England Ville, Freetown. The ESMPs for the Regional Offices have been prepared and submitted to the World Bank, but the ESMP for the Freetown site is still ongoing and will be ready prior to the start of this assignment. The AMP will provide guidance and tools to assess and manage E&S risks and impacts from exposure to airborne asbestos fibres from the New England construction site.

MLHCP seeks the services of an experienced asbestos-certified individual consultant for the preparation of an AMP, provide training for the relevant staff of the PCU, EPA SL, MLHCP, NLC and staff of the contractors for the construction of NLC building at New England Ville, Freetown.

2. ENVIRONMENTAL AND SOCIAL RISKS AND REQUIREMENTS

The management of the environmental and social risks and impacts of the project is guided by the Bank Environmental and Social Framework (ESF), which became operational in October 2018 and set out requirements for borrowers to identify and assess the environmental and social risks and impacts associated with projects funded by the World Bank. The ESF also assist the Bank to help borrowers reduce poverty and increase prosperity in a sustainable way for the benefit of the environment and people. The standards will: (a) Help borrowers implement international best practices for environmental and social sustainability; (b) Assist borrowers in meeting their national and international environmental and social obligations; (c) Strengthen non-discrimination, transparency, participation, accountability, governance and inclusion; and (d) Improve project sustainability outcomes through continued stakeholder engagement.

ESF provides methods and tools for the Borrower to carry out the environment and social assessment (ESA) of programs and projects. Project activities outlined in the introduction above will likely have environmental and social risks and impacts, and as required under the ESF, the preparation of E&S instruments will need to be prepared by the Borrower to guide the management of these risks and impacts and therefore, improve social and environmental sustainability, and inclusive development. The preparation of the AMP TOR is to align with the ESF and in specific the following eight Environmental and Social standards (ESSs):

The environmental and social (E&S) risk classification is Substantial. The World Bank's Environmental and Social Framework (ESF) requires the Bank and Borrowers to better manage environmental and social risks of projects and to improve development outcomes. The SLLAP is therefore subject to the World Bank ESF requirement; 8 of the 10 Environmental and Social Standards (ESSs) apply to the project:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts
- ESS2: Labor and Working Conditions
- ESS3: Resource Efficiency and Pollution Prevention and Management
- ESS4: Community Health and Safety
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS8: Cultural Heritage
- ESS10: Stakeholder Engagement and Information Disclosure

The proposed environmental and social risk classification is Substantial. The Key environmental risks associated with the construction and operational phases of the Freetown National Land Commission Office are: (i) risks of exposure to airborne asbestos fibres; (ii) removal and disposal of asbestos-containing materials (ACM) from the construction site to a safe area designated by the EPA SL; (iii) community health and safety concerns for nearby communities, offices, petty traders, gardeners, clients, passers-by, visitors, pedestrians, other users; (iv) traffic management; (v) sexual harassment (SH) / sexual exploitation and abuse (SEA) risks associated with labour and civil work since the contractor workforce can heighten risks of SEA/SH; and (vi) occupational health and safety of workers and contractors.

3. OVERALL AIM AND OBJECTIVES

The objective of this assignment is to support the MLHCP/SLLAP in the preparation of an Asbestos Management Plan (AMP) for SLLAP

The purpose of preparing and implementing an AMP is to minimize and /or eliminate the possibility of exposure to airborne asbestos fibres for the New England Ministry of land employees, construction workers, the public using the buildings, and maintenance workers. The SLLAP AMP will remain in effect until all asbestos-containing materials (ACM) have been completely and safely removed; and securely disposed of from the new England Facilities.

Objectives

The objective of this assignment is to undertake the preparation of an asbestos management plan necessitated by the presence of ACM in the old building that is to be demolished for the construction of the new Land Commission offices.

The AMP will be prepared in line with the Environmental and Social Framework (ESF) of the World Bank and relevant laws and policies of the Government of Sierra Leone. The plan shall take into consideration the World

Bank's requirements under the ESSs relevant to the project, the World Bank Group's Environmental Health and Safety Guidelines, and the World Bank Good Practice Notes (GPNs), Technical Guidance Notes for Asbestos Management in World Bank Operations, and all appropriate current World Health Organization (WHO) Guidance.

The specific objectives of the assignment are as follows:

- To develop a comprehensive AMP as per the World Bank ESF requirement.
- To prepare a set of instructions, procedures or protocol for all parties and stakeholders involved or potentially affected during the asbestos removal and disposal;
- To identify the key potential environmental and social safeguards issues associated with the Asbestos Containing Materials (ACM);
- To identify and engage key stakeholders like the EPA-SL, NPAA, the staff/employees and public about ACM;
- To provide details on selection, management and estimated budget for the hiring of an International Expert/Firm for the implementation of the AMP.

The Consultant shall ensure that all adverse impacts associated with ACM of the New England NLC office construction site and operation of the project, including all associated/ancillary works and linked activities if any, are assessed and taken into account, and that the appropriate mitigation measures are proffered for implementation with the associated budget for the implementation of the AMP.

This consultancy is considered complete only upon approval and clearance of the final version of the AMP by MLHCP/SLLAP.

4. SCOPE OF CONSULTANCY SERVICES

A Certified individual consultant shall be hired to develop the AMP designed to minimize the possibility of accidental disturbance of asbestos-containing materials and to protect SLLAP workers and building contractors/workers who must work around these materials. The work of the consultancy shall involve literature review, site visits, data collection, overview of the situation, training of relevant staff including identification of asbestos and ACM, analyse and prioritize the risks, stakeholder engagement and to support the SLLAP Project Coordination Unit (PCU) by working in close coordination with assigned E&S safeguards staff applying learning by doing approach for the preparation of AMP.

- The SLLAP AMP shall include the following items: Be prepared by an internationally certified consultant;
- Require approval, monitoring, and supervision by EPA from planning to disposal of the asbestos-containing materials;
- Be strictly implemented, and the client to ensure that work cannot proceed without an approved AMP;
- Identify a dedicated disposal facility and methodology for the ACM;
- Identify asbestos-specific PPE for workers involved in the demolition exercise; and

- Indicate that the demolition area will be cordoned off over a safe distance during the entire period.
- A written AMP compliant with the World Bank's ESF and WB guidance note on AMP and/or and all appropriate current World Health Organization (WHO) Guidance.
- Identification of the asbestos/ACMs (including details of the asbestos survey, location, and conditions of the ACMs.
- Risk assessment (such as risks posed by the identified ACMs and prioritization of risks based on the condition and likelihood of disturbance)
- The AMP will include details on 1) monitoring and supervision by EPA from planning to disposal of the asbestos-containing materials; 2) dedicated disposal facility and methodology for the ACM; 3) occupational health and safety including worker precautions and asbestos-specific PPE for workers involved in the demolition exercise; 4) how the demolition area will be cordoned off over a safe distance during the entire period, 5) communication with all stakeholders (MLHCP/SLLAP PCU, EPA SL, NLC, etc.); 6) how the work and the work procedures are to be carried out;7) dealing with the hazardous waste including all removal, transport and final disposal; 8) re-opening of the New England NLC office construction site after completion of the work .
- The consultant will help MLHCP secure EPA approval of the AMP
- An asbestos survey and a survey report for the facility
- A notification system to control activities that might disturb ACM,
- A periodic, routine monitoring or inspection system by the EPA SL and EMS of SLLAP,
- A provision for training program/plan for EMS, EPA staff and employees who will come in contact with the materials
- A thorough documentation and recordkeeping system.

The consultant will also advise MLHCP on the AMP implementation cost, and the inclusion of relevant provision on the bidding document for the works.

5. Key Deliverables, Timing and Payment Schedule

The Consultancy is expected to last for Two (2) months. The main outputs and payment schedule for this assignment are as follows in the table below:

Table 1: Consultant Deliverable Schedule

No.	Deliverables	Timing (DRAFT ONLY)	% of Payment
1	Inception Report including updated workplan and overview of the asbestos situation, including a training plan	1 week after contract signing	20
2	First Draft Asbestos Management Plan (AMP) & Training Plan	5 weeks after contract signing	30
3	Final Draft AMP report & Training Plan	6 weeks after contract signing	30

4	Final Report one week after receipt of final comments from MLHCP/PCU and the World Bank	8 weeks after contract signing	20

The consultancy is considered complete only upon approval and clearance of the final versions of the above documents by the MLHCP.

REPORTING

The Consultant will work under the direct supervision of the PCU and in close collaboration with the World Bank safeguards team.

Formats for delivery of outputs:

- All key deliverables shall be provided in both soft and hard copies to the client. The Final Reports shall be provided within 2 weeks after receipt of comments from the Client and the World Bank.
- Final reports, and drafts, shall be submitted in Word format. Copies of the AMP shall be submitted, a final clean version and one version in track change, showing change and how comments were addressed.
- The consultant will attend regular project meetings with the client to monitor project progress and present and discuss deliverables.
- All reports shall be written in English.

6. Qualification and Experience

Environmental/Asbestos Management Specialist:

- A Master's Degree in Environmental Science, Engineering, Environmental Management or any other relevant discipline
- At least 15 years of experience in environmental assessments;
- Possess an internationally recognized certification for asbestos management;
- Proven experience in similar assignments and at least two similar assignments;
- Proven experience as the team member of at least one successful project developing Environmental and Social Risks Management Systems for Asbestos management;
- Experience of the new World Bank Environmental and Social Framework (ESF) is required;
- Proven experience in training and capacity building;
- Possess excellent technical and analytical skills;
- Fluency in English (both spoken and written);
- Excellent inter-personal skills and demonstrated ability to undertake broad stakeholder engagement;
- Experience in the region and sub region or similar environment is desirable;
- Strong analytical and presentation skills.

ANNEX 5: STAKEHOLDER ENGAGEMENT DETAILS (PROOF OF ENGAGEMENT)

(a) Minutes of Key Informant Stakeholder Consultation Meeting with the Environmental Protection Agency-Sierra Leone

Date: 1st December, 2023
Venue: The Environment Protection Agency – Sierra Leone Office, the Chief Director Office
Attendant: The Chief Director, Mr. Sheku Kanneh
Start Time: 11:30 a.m.

Stakeholder - Chief Director

The consultant (Yakuba Bah), presented the Project brief including duration, and discuss with following;

- 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?

Comments/Suggestions from Mr. Sheku Kanneh

The construction work could result in changes in land use, leading to the loss of vegetation, habitat for small mammals, and movement corridors, as well as potential soil erosion and contamination of surface and groundwater. Additionally, it could increase traffic, noise, and dust in the neighbourhood. It is important to address these issues effectively through mitigation measures. One typical mitigation measure for the loss of vegetation is the planting of trees and flowers as part of the landscaping work.

The project must comply with national regulations related to waste management to minimise negative impacts on the environment and the neighbourhood.

A project of this nature could potentially increase sexual harassment, sexual exploitation, and gender-based violence within the project community. It is imperative to proactively address and mitigate these risks.

The safety and well-being of both construction workers and neighbourhood should be a priority of the SLAPP. Proper safety protocols and measures need to be in place to prevent accidents and injuries.

The use of sustainable construction materials must be prioritised to minimise the ecological footprint of the construction work.

Engaging with local stakeholders is important, as their input is valuable in identifying potential impacts and mitigation measures. Their involvement will also help monitor compliance with the ESMP.

End Time: 13:00

(b) Minutes of Key Informant Stakeholder Consultation Meeting with the Freetown City Council

Date: 19th December, 2023
Venue: Freetown City Council – Office of the City Engineer
Attendant: City Engineer, Mr. D**unstan Sacke**h

Start Time: 11:30 a.m.

Presentation of the project brief including duration was done by the consultant (Yakuba). The following were discussed; perceived environmental and Social Risks, Building design and construction methods, Issues with Building Permits.

Comments/Suggestions
Potential Environmental and Social Impacts

The potential exists for noise disturbances due to construction activities that may affect nearby residents and local businesses, especially during early morning and late evening hours.

Emissions from construction equipment and dust generated during the construction process could impact air quality.

There risks associated with increased traffic both on-site and off-site, that may. result to increase in the likelihood of accidents, impacting both workers and the community.

Design Considerations

The design of the building should incorporate universal design principles to ensure accessibility for individuals with special needs. This includes features like ramps, wider doorways, and accessible restrooms.

Energy-efficient systems should be implemented throughout the building to reduce energy consumption and promote sustainability.

Design Drawings and Specifications

Design drawings, including detailed specifications must be submitted to the Ministry of Works and Public Assets (MWPA) for review and approval. This step is crucial to ensure that the project meets all regulatory requirements.

A building permit will be obtained from the Ministry of Lands, Housing, and Country Planning (MLHC) before commencing construction. This permit is essential for legal compliance and project authorization.

Geotechnical Investigation

The Ministry of Works and Public Assets (MWPA) will determine if a geotechnical investigation is required. This investigation will assess the soil and subsurface conditions to ensure the stability and safety of the construction site.

End at 12:40

(c) Minutes of Key Informant Stakeholder Consultation Meeting with the National Commission for Persons with Disability

Date: 13th March, 2024
Venue: National Commission for Persons with Disability Office
Attendant: Programme Manager, Mr. Tamba SP Mondea
Start at 13:30

The consultant (Yakuba Bah), presented the Project brief including duration, and then discuss the following:

- 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

Comments/Suggestions

Mr. Tamba SP Mondea said that the construction site must provide well-marked access routes and clear signage to ensure the safety of individuals with disabilities. This helps in navigating the site safely and efficiently. He then indicated that contractor(s) and their employees should receive comprehensive training on disability inclusion and accessibility requirements. He continued that this training should emphasise the importance of accommodating individuals with disabilities and creating an inclusive environment. He stressed that regularly monitoring of the construction activities should be done to ensure ongoing compliance with accessibility standards, as this helps in maintaining an inclusive environment throughout the construction process.

He concluded by saying that the construction should adhere to all relevant building codes to ensure that facilities are accessible to everyone, including those with disabilities. This includes:

- **Universal Design:** Incorporate design principles that make spaces usable by all people, regardless of their abilities.
- **Easy Access and Parking:** Ensure there are accessible parking spaces and easy access routes to the building.
- **Elevators:** Install elevators to facilitate vertical movement within the building.
- **Clear Signage:** Use clear and easy-to-read signage throughout the facility.
- **Accessible Fixtures:** Include accessible fixtures in bathrooms and offices to accommodate the needs of individuals with disabilities.

End at 14:30

(d) Minutes of Key Informant Stakeholder Consultation Meeting with the National Fire Officer, The Sierra Leone National Fire Force (NFF)

Date: 13th March, 2024
Venue: The Sierra Leone National Fire Force
National Fire Offer - Mr. Naa Kamanda Bongay
Start at 14:30

The consultant (Yakuba Bah), presented the Project brief including duration, and then discuss the following with the Programme Manager:

- 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?
- Is fire safety training provided by the National Fire Force?

Comments/Suggestions

Mr. Naa Kamanda Bongay, the National Fire Officer indicated that the contractor should develop an emergency response plan outlining the assembly points and directions for all occupants in the construction site.

He said that though they do not give fire permits, the fire safety design of the building should be sent to the National Fire Force for review and advice. He cited that a well-designed fire safety plan should include fire-resistant materials, clearly marked exit routes, and proper classification of fire hazards. He said that essential equipment like fire doors, fire-rated walls, and other fire suppressant materials should be used and readily accessible. He continued that the requirements vary by location and building type but typically include the installation of fire prevention measures such as sprinklers, fire extinguishers, and smoke detectors. Additionally, the design should include a water storage tank and water source with one or two hydrants for firefighting, said the National Fire Officer.

He indicated that the National Fire Force will inspect the site during and after the construction work and provide further advice. The frequency of inspections varies, which could be monthly, and fire extinguisher refills should be done half-yearly.

He concluded with this statement, during the operational phase, the building occupants should receive training on fire safety, including how to use fire extinguishers and evacuate the premises.

End at 15:30

(e) Minutes of Key Informant Stakeholder Consultation Meeting with the National Water Resources Management Agency (NWRMA) - Hydrologist/GIS Officer

Date: 8th March, 2024
Venue: National Water Resources Management Agency (NWRMA) Office
Attendant: Mr. Abubakarr Kamara, Hydrologist and GIS Officer

Start at 10:30

The consultant (Yakuba Bah), presented the Project brief including duration, and then discuss the following with Mr. Abubakarr Kamara:

- 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?

Comments/Suggestions
Mr. Abubakarr Kamara, Hydrologist and GIS Officer at the National Water Resources Management Agency, stated that to prevent water contamination, it is crucial to keep materials and chemicals away from water sources, implement spill prevention measures, and provide personnel training on safe chemical handling. He continued that construction waste must be categorized and stored properly, disposing of it at approved sites to prevent contamination of surface and groundwater from site wash-off, while avoiding open dumping. He also cited the need for implementing erosion control measures to prevent site wash-off into nearby surface water.

He indicated that chemical storage areas should be secured to prevent accidental spills leading to surface and groundwater contamination. He went on to say that any accidental oil or chemical spillage must be cleaned up immediately to prevent wash-off into nearby streams during rain and percolation into the groundwater. He stated that the underground septic system must be constructed effectively to prevent seepage into the groundwater table.

He stressed that it is also important to conduct groundwater quality monitoring near the site (approximately 50m-100m depending on the elevation) before and after commissioning the office complex. Finally, he concluded that registering with the NWRMA for the development of a groundwater facility is essential to ensure compliance with relevant regulations.

End at 12:00

(f) Minutes of Key Informant Stakeholder Consultation Meeting with SALWACO

Date: 5th March, 2024
Venue: SALWACO Office
Attendees:

The Director of Research and Planning – Mr. Saffa S.K Bocakrie

Senior Research Officer – Mr. Tamba SP Momoh

Start at 14:30

The consultant (Yakuba Bah), presented the Project brief including duration, and then discuss the following with Mr. Abubakarr Kamara:

- 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?

Comments/Suggestion
SALWACO provides pipe borne water supply to residents in the four townships (Bo, Makeni, Kenema, and Port Loko) said Mr. Saffa Bockarie. He continued that if SALWACO were to provide water supply to the construction

work in the four regions, the demand for water supply would increase, but yet they this increase in demand will not be a burden to their operation as long as prompt payment is made for the water supplies.

Mr. Tamba SP Momoh, suggested to use water-efficient fixtures and systems, as well as other water-saving technologies both during construction and in the final building to conserve water as a finite resource. He concluded by saying that there is currently no information available regarding any water usage limit.

End at 16:10

(g) Minutes of Key Informant Stakeholder Consultation Meeting with the Ministry of Employment, Labour and Social Security

Date: 6th February, 2024
Venue: Deputy Commissioner of Labour Office

Start at 12:30

The Deputy Commissioner of Labour - Mr. Ghiblee F Kamara

The consultant (Yakuba Bah), presented the Project brief including duration, and then discuss the following with Mr. Ghiblee F Kamara:

- 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.

Comments/Suggestion
The Deputy Commissioner, Mr. Ghiblee F Kamara, stated that it is imperative that the project addresses potential environmental and social impacts such as noise, air pollution, and traffic incidents both on and off-site, as well as ensuring occupational and community safety. Adherence to safety standards, prompt hazard management, and the provision of necessary personal protective equipment are non-negotiable.

Furthermore, contractors must comply with the Sierra Leone Employment Act, 2023 by ensuring that the construction work/site is registered with the ministry, notifying the ministry of any job vacancies, and having all employment-related documents vetted and attested by the Commissioner for validity. It is mandatory to comply with the Act's regulations, including the adherence to safety standards and the prompt management of hazards, and to provide necessary personal protective equipment.

End at 13:40

(g) Minutes of Key Informant Stakeholder Consultation Meeting with the Ministry of Works and Public Assets (MWPA)

Date: 26th March, 2024
Venue: MWPA – Chief Engineers Office
Attendant: The Chief Engineer – Ing Abdul J.D. Shaw

Start at 13:30

The consultant (Yakuba Bah), presented the Project brief including duration, and then discuss the following with Ing Shaw:

- Perceived Environmental and Social Risks related to Construction Work
- Approval Process for Public Building Construction Projects
- Engineering Design Standards for Public Building Construction

Comments/Suggestion

Ing Shaw Emphasised that the environmental and social risks associated with the construction project include waste management, intermittent noise and air pollution, possible disruptions to nearby residents, and potential health and safety concerns for workers and nearby residents. He also outlined the MWPA approval process, which comprises a review of the structural design to ensure compliance with universal accessibility standards, adherence to fire safety standards with the collaboration of NFF for fire-resistant materials, alarms, and sprinkler systems, and the potential need for geotechnical investigation results based on the construction site requirements.

End at 14:20

(f) Minutes of Key Informant Stakeholder Consultation Meeting with the Sierra Leone Land Alliance

Date: 28th March, 2024
Venue: Sierra Leone Land Alliance
Attendant: The Director – Mr. John Paul Bai
Start at 13:25

The consultant (Yakuba Bah), presented the Project brief including duration, and then discuss the following with Mr. John Paul Bai:

- 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?

Comments/Suggestion

- The Director of the Sierra Leone Land Alliance emphasised the following:
- To incorporate landscaping and planting of trees and flowers to compensate for any loss of vegetation, irrespective of its scale, as part of the construction project.
- To ensure that the construction plans take into account accessibility for individuals with disabilities, reflecting the organization's commitment to inclusivity.
- To discuss the intended type of structures with relevant stakeholders and gather input and address any concerns they may have.
- To involve the local community in the construction process, fostering collaboration and ensuring that their perspectives are considered.

End at 14:15

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