

GOVERNMENT OF SIERRA LEONE

MINISTRY OF BASIC AND SENIOR SECONDARY EDUCATION



THE FREE EDUCATION PROJECT IN SIERRA LEONE

P167897

# **ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)**

November, 2023 (Updated)

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## Abbreviations and Acronyms

AF	Additional Financing
CERC	Contingent Emergency Response Component
COVID-19	Coronavirus Disease 19
DP	Development Partners
EAA	Education Above All
EPRP	Emergency Preparedness and Response Plan
E&S	Environmental and Social
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EPA	Environment Protection Agency
EPAA	Environment Protection Agency Act
EPASL	Environment Protection Agency, Sierra Leone
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESP	Educational Sector Plan
ESS	Environmental and Social Standards
FEPS	FREE Education Project Secretariat
FEPC	Free Education Project Coordinator
GBV	Gender-Based Violence
GIIP	Good International Industry Practice
GPE	Global Partnership for Education
GRM	Grievance Response Mechanism
MBSSE	Ministry of Basic and Senior Secondary Education
MDTF	Multi Donor Trust Fund
M&E	Monitoring and Evaluation
MLHE	Ministry of Lands Housing and Environment
NBSAP	National Biodiversity Strategy and Action Plan
NCTVA	National Council for Technical Vocational and Other Academic Awards
NDP	National Development Program
NEP	National Environmental Policy
NGO	Non-Government Organizations
NPSE	National Primary School Examination

OOSC	Out of School Children
PIM	Project Implementation Manual
PIU	Project Implementation Unit
PS	Permanent Secretary
RAP	Resettlement Action Plan
REDiSL	Revitalizing Education in Sierra Leone
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
SEA	Sexual Exploitation and Abuse
SGBV	Sexual and Gender Based Violence
SMC	School Management Committee
STD	Sexually Transmitted Disease
STI	Sexually Transmitted Infection
TPD	Teacher Professional Development
TSC	Teaching Service Commission
TVET	Technical and vocational education and training
WMP	Waste Management Plan

## Executive Summary

The World Bank supports the Sierra Leone Government's flagship program, 'Free Quality Primary and Secondary Education', through FREE Education Project. The objective of the project is to improve the management of the education system, teaching practices, and learning conditions. The project takes place throughout Sierra Leone in various schools and districts.

The Free Education (FREE) Project, designated as P167897, was granted approval on June 29, 2020, with a total value of US\$50 million in International Development Association (IDA) funds. The project officially commenced on August 10, 2020. The primary goals of the FREE Project are to enhance the administration of the education system, optimize teaching methodologies, and enhance the learning environment. The FREE Project receives financial support from various sources, including a grant of US\$15.97 million from the European Union (EU), the Foreign, Commonwealth, and Development Office (FCDO) of the UK, and Irish Aid. This funding is channeled through the Sierra Leone education multi-donor trust fund (MDTF), TF073453, which is administered by the World Bank. The establishment of this trust fund took place in February 2020.

The parent Project comprises of the following five components, each with sub-components, and the respective intervention packages:

- Component 1 - Policy, Governance, Accountability and System Administration.
- Component 2 - Teacher Management and Professional Development,
- Component 3 - School Level Education Development,
- Component 4 - Program Management, Coordination and Monitoring and Evaluation,
- Component 5 - Contingent Emergency Response Component (CERC),

A sixth component was added in the project through an AF grant for the Coronavirus Disease 19 (COVID-19) Education Response (P174958), in the amount of US\$6.85 million from the Global Partnership for Education (GPE).

- Component 6 - COVID-19 Education Response [Closed on December 31, 2022].

The approval of the AF was granted by the Regional Vice President of the World Bank on February 5, 2021. Subsequently, it was officially signed on February 26, 2021, and its implementation commenced on May 24, 2021. The Action Framework (AF) pertaining to the COVID-19 response, specifically Component 6, was effectively executed and officially concluded on December 31, 2022.

On August 10, 2022, the Contingent Emergency Response Component (CERC) was mobilized in response to a socio-economic crisis that adversely affected the education sector. The allocated funding for this reaction amounted to around US\$12 million. The funding provided support for essential educational expenditures, including two months' worth of teacher salaries and examination fees for students in the twelfth grade. The approval for the third restructuring was granted by the Country Director for Sierra Leone on June, 2023. This restructure was undertaken to incorporate the activation of the Country Emergency Response Component (CERC), make necessary modifications to the Results Framework, and redistribute the International Development Association (IDA) funds across different categories.

A seventh component supported by the second AF (US\$ 20 M by IDA and US\$13.73 M by Education Above All, EAA) has been added (approved by the Board of Executive Directors on September 26, 2023):

- Component 7 - Enhancing Access to Education and Supporting Foundational Learning for All.

The second additional financing (AF) will allow the project to scale up key interventions that support the education reform. In parallel, the restructuring will extend the project closing date from September 30, 2025, to December 31, 2027, and the Results Framework is revised with additional new indicators commensurate with new activities that are added as part of the proposed AF. The AF will scale up components 1, 3 and 4 under the Parent Project, and will introduce component 7. It will not support components 2 and 5 of the Parent Project, nor component 6 of the 1<sup>st</sup> AF.

Interventions under the 2<sup>nd</sup> AF fall under the following components:

- *Component 1: Policy, Governance, Accountability, and System Administration*, will support (i) the implementation of the ASC during the project extended period between 2025 and 2027 to ensure that school statistics and basic education information are collected annually, analyzed, and used for policy development and school support, (ii) the implementation of the newly developed school curriculum, and (iii) will support the scale-up of the ongoing gender activities, especially to improve grievance response in the education system.
- *Component 3: School Level Education Development*: The proposed second AF will support implementation of one of key activities set under the School Health Policy – provision of first aid kits for schools.
- *Component 4: Project Management, Coordination, and Monitoring and Evaluation*: The AF will cover the costs of managing the project as well as M&E arrangements and learning and communications activities.
- *Component 7: Supporting and Reinforcing Foundational Learning for All*: this component, specifically added through this AF will support and reinforce foundational learning for all, with special attention to out-of-school children .

This Environmental and Social Management Framework (ESMF) has been prepared to identify the potential environmental and social risks and impacts of the Project activities supported by the AF, and to propose suitable mitigation measures to manage these risks and impacts. It maps out the laws and regulations of Sierra Leone and the World Bank policies applicable to the Project, and describes the principles, approaches, implementation arrangements, and environmental and social mitigation measures to be followed.

The potential environmental and social risks for the project activities: The AF2 will have positive social and environment impacts as it will support the development of curriculum and syllabus for primary and secondary education, scale up gender activities already supported by the parent project and First AF, and provide first aid for schools.

**Environmental Risks:**

There are no physical or civil works or supply of hazardous materials associated with the AF activities, and the provision of first aid kits to schools is an important step towards emergency preparedness. However, there is the risk of waste from first aid kits, which is quite minimal. The composition of the first aid kits is yet to be determined, but these kits typically consist of plasters, gauze dressings, bandages, safety pins, gloves and tweezers. Contaminated waste from first aid kits could pose a biohazard, while all wastes are potential pollutants. Pupils, teachers and school workers could be infected by pathogen contaminated wastes from used first aid kits, if not properly handled. Risk to biodiversity or cultural heritage is quite low.

**Social Risks:**

Key social risks, however, will include risk of exclusion of disadvantaged children such as orphaned children, girls, and children with disabilities during implementation of the foundational learning and OOSC interventions. Other potential social risks include risk of school-based sexual exploitation and abuse and sexual harassment (SEA/SH), Worker's health, safety and working conditions, and service providers charging unapproved fees despite the free OOSC program.

Additional risk due to AF: The AF activities will not introduce any new Environmental and Social Standards (ESSs) other than those already applicable to the parent project. As such, the preparation and implementation of the activities under this AF will comply with all ESF requirements of the parent project. The AF is expected to have positive social and environmental impacts, empowering children to acquire further learning, improve early grade quality, increase enrollment and retention, and keep children safe in school. Key positive impacts include: (i) better health outcome for students due to provision of first aid kits for school, and (ii) reduction of violence in school.

These risks will be managed and mitigated through the application of several mitigation measures. Mitigation measures for the environmental risks associated with contaminated waste from first aid kits in schools are as follow.

- Proper Handling and Disposal: Ensure that all used first aid materials, such as plasters, gauze dressings, and gloves, are disposed of safely. This may involve using designated waste containers or contacting a professional waste management service.
- Education and Training: Provide training to pupils, teachers, and school workers on the proper handling and disposal of first aid waste. This includes educating them about the potential risks of pathogen contamination and the importance of following proper procedures.
- Regular Inspections: Conduct regular inspections of first aid kits to identify any damaged or expired items. Promptly replace any contaminated or expired materials to minimize the risk of infection.
- Promote Hygiene Practices: Encourage regular handwashing and the use of gloves when handling first aid materials. Promote awareness among pupils, teachers, and school workers about the importance of maintaining good hygiene to reduce the spread of pathogens.
- By implementing these mitigation measures, the risk of infection and environmental pollution associated with contaminated waste from first aid kits can be minimized in school settings.

Mitigation measures for the environmental and social risks associated construction covered by the parent project are as follows:

- Deploying traffic controllers during classroom construction to reduce congestion especially in the western urban.
- Providing personal protective equipment
- Enforcing speed limits of construction vehicles
- Maintaining vehicles and machines
- Monitoring particulate matter levels
- Noise pollution mitigation includes:
  - Limiting noise levels
  - Restricting construction activities that produces noise during school hours.
- Employment conflicts include:

- Harassment
- Child labor
- Gender-based violence
- Poor working conditions
- HIV/AIDS and other STDs
- Grievance Redress Systems has been established to resolve localized conflicts, and complaints are reported to the through the project GRM pathway.
- Contractors must update the Labor Management Procedure and establish a worker's Grievance Redress System.
- Contractors must ensure that children and minors are not employed on the project.
- Contractors supervised by MBSSE will:
  - Obstruct access to children and minors.
  - Raise HIV/AIDS awareness.
  - Awareness on corona virus
- Bidding documents will minimize the use of workers from outside the vicinity.
- Contractors must comply with the project GBV/SEA Action Plan.
- Demolition of old buildings containing asbestos and hazardous materials:
  - Asbestos roofing or material will be doused with water and cut into appropriate sizes for easy transportation.
- The construction project involves various measures to ensure safety and environmental protection.
- Asbestos will be wrapped with polythene material and sealed with duct tape and marked as "hazardous material" for burial in lined pits.
- Warning signs will be placed at the burial grounds, and specialized personnel will be used for the removal and disposal of asbestos.
- If excavated materials and construction waste contain hazardous materials, they will be transported in trucks lined with tarpaulin to approved final disposal sites and buried in a pit lined with geo-textile material.
- Site clearing activities, such as compaction, site preparation, and excavation, will also be conducted.
- Topsoil removal and vegetation removal will be minimized, with the topsoil layer kept at designated sites for future revegetation.
- Bunds around the worksite will be constructed to contain soil and prevent it from being washed away in the rain.
- Construction waste management will involve pollution of surface water, wetlands, and groundwater, spilling and release of hazardous substances, and unsafe waste handling practices.
- Storage facilities for fuel, lubricants, oil, construction materials, and chemicals will be maintained, and transportation and disposal will be done according to established procedures.
- A buffer zone will be maintained between construction wastes or excavated earth and drains or wetlands.
- Community health and safety issues will be addressed during construction activities.
- Barriers will be erected around decommissioned facilities, security officers on high alert, and cooperation from local authorities.
- Workers' daily construction activities, including bricklaying, lintels, tie-beams, and roof works, will also be monitored for occupational health and safety issues.

### **Implementation Arrangements.**



The Free Education Project Secretariat (FEPS) within MBSSE is responsible for implementing the Environmental and Social Management (ESMF) project. The FEPS consists of four personnel: E&S Specialist, Social Development Specialist, Gender Specialist, Communications Officer, and Monitoring and Evaluation (M&E) Officer. The FEPS serves as an interface between MBSSE and the Bank. The ESMF is supervised by two committees and several personnel: an overarching E&S Management Review Committee headed by the Minister of MBSSE at the national level, and a Local E&S Management Committee that operates at the field level. The E&S Management Review Committee reviews the progress in ESMF implementation on a quarterly basis to ensure its suitability, adequacy, and effectiveness. The Local E&S Management Committee comprises the Free Education Project Coordinator (FEPC), Deputy Education Directors, Local Councils, and Chiefdoms, primarily monitoring the implementation of the ESMF at the field level. The Minister leads political coordination within government agencies, the Permanent Secretary (PS) upholds the E&S Commitment Plan, and the Secretariat coordinates the development of the ESMF and management plans for all areas targeted for the Free Education Project. The Free Education Project Secretariat (FEPS) is responsible for providing feedback on contractor performance to support the World Bank's initiatives to track contractor performance across its portfolio. The Environmental and Social Specialist is accountable for implementing commitments at the project, including environmental and social commitments and mitigation measures, and contributes to the identification of environmental and social risks. Regional Coordinators work closely with the Secretariat's E&S Officer, contribute to the identification of environmental and social risks, management plans, and emergency preparedness and response plan EPRP, and assist in supervising contractor activities to ensure compliance.

A subcomponent of the AF activities will be managed by NGO consortium. The responsibility for performance monitoring and decision-making of activities performed by the NGO Consortium Program Implementation Unit will lie with the NGO Consortium Program Management Board. This board will consist of the country director of each NGO partner and the chairman of party. The individual in charge of the Non-Governmental Organization (NGO) Consortium Program Implementation Unit will establish a tight working relationship with the Free Education Project Secretariat (FEPS), Ministry of Basic and Secondary Education (MBSSE), Teacher Service Commission (TSC), government representatives at the district level, World Bank, and participating Development Partners (DPs) of the Multi-Donor Trust Fund (MDTF). Additionally, regular monthly meetings will be held with the FEPS during the whole implementation phase. The primary personnel responsible for managing the consortium are as follows: (i) a head of party, (ii) an award manager, (iii) a finance manager, (iv) a monitoring, evaluation, accountability, and learning manager, and (v) an environmental and social protection coordinator.

### **Monitoring.**

The project will undergo regular monitoring visits by the FEPS team, MBSSE, World Bank, and relevant stakeholders to oversee its progress and performance. The frequency depends on the project's requirements. Mobile devices have been distributed to the Clerk of Works to capture data and communicate with FEPS monitoring teams. Contractors are responsible for implementing subproject activities and implementing mitigation measures outlined in E&S risk management documents. These monitoring mechanisms enhance project performance, ensuring successful implementation while minimizing potential environmental and social impacts.

A separate **Stakeholder Engagement Plan (SEP)** has been prepared for the Project, based the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP can be found here: [https://mbsse.gov.sl/wp-content/uploads/2023/07/SEP\\_-SL-Free-Education\\_AF2\\_2023.pdf](https://mbsse.gov.sl/wp-content/uploads/2023/07/SEP_-SL-Free-Education_AF2_2023.pdf), July 11, 2023.

## 1. Introduction

This Environmental and Social Management Framework (ESMF) is developed to support the environmental and social due diligence provisions for activities financed by the World Bank in the Free Education Project. The project supports to improve the management of the education system, teaching practices, and learning conditions throughout Sierra Leone in various schools and districts. The specific locations of the project activities are determined based on the needs of the educational sector and the availability of resources. The Ministry of Basic and Senior Secondary Education is implementing the Project activities.

This ESMF follows the World Bank Environmental and Social Framework (ESF) as well as the national laws and regulations of Sierra Leone. The objective of the ESMF is to assess and mitigate potential negative environmental and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements. More specifically, the ESMF aims to (a) assess the potential environmental and social risks and impacts of the proposed Project and propose mitigation measures; (b) establish procedures for the environmental and social screening, review, approval, and implementation of activities; (c) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities; (d) identify the staffing requirements, as well as the training and capacity building needed to successfully implement the provisions of the ESMF; (e) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) establish the budget requirements for implementation of the ESMF.

This ESMF should be read together with other plans prepared for the project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP), Gender Action Plan, Emergency Preparedness and Response plan (EPRP) and the Resettlement Action Plan (RAP).

## 2. Project Description

The World Bank supports the Sierra Leone Government's flagship program, 'Free Quality Primary and Secondary Education', through FREE Education Project. The objective of the project is to improve the management of the education system, teaching practices, and learning conditions. The project is well-aligned with Government and World Bank priorities and strategies, focusing on addressing education sector challenges and transforming the education system in the long-term. It is aligned with the main objectives and focus of the Educational Sector Plan (ESP) 2022-2026 as well as the National Development Program (NDP) 2019-2023. Specifically, the project was designed to support the Government's Free Quality Education Program, which is aimed at ensuring that free quality education can be provided to all children.

The project takes place throughout Sierra Leone in government supported schools of all 16 districts. The locations of the project activities are determined based on the needs of the educational sector and the availability of resources.

The parent Project comprises of the following five components, each with sub-components, and the respective intervention packages:

- Component 1 - Policy, Governance, Accountability and System Administration.

- Sub-component 1.1 – Evidence-based education planning and rationalization
- Sub-component 1.2 – Curriculum reform and assessments of student learning outcomes
- Sub-component 1.3 – Gender equality and inclusive education
- Component 2 - Teacher Management and Professional Development
  - Sub-component 2.1 – Teacher workforce planning and teacher management
  - Sub-component 2.2 – Teacher professional development
- Component 3 - School Level Education Development,
  - Sub-component 3.1 – Performance based school financing,
  - Sub-component 3.2 – Physical improvement to the learning environment
  - Sub-component 3.3 – School health (newly added through second AF)
- Component 4 - Program Management, Coordination and Monitoring and Evaluation,
- Component 5 - Contingent Emergency Response Component (CERC),

A sixth component was added in the project through an AF grant for the Coronavirus Disease 2019 (COVID-19) Education Response (P174958), in the amount of US\$6.85 million from the Global Partnership for Education (GPE).

- Component 6 - COVID-19 Education Response [Closed on December 31, 2022].

A seventh component supported by the second AF (US\$ 20 M by IDA and US\$13.73 M by Education Above All, EAA) has been added (approved by the Board of Executive Directors on September 26, 2023):

- Component 7 - Enhancing Access to Education and Supporting Foundational Learning for All (newly added through second AF).
  - Sub-component 7.1 – Accelerating Foundational Learning competencies
  - Sub-component 7.2 – Improving learning opportunities catered for Out of school children (OOSC)
  - Sub-component 7.3 – Strengthening system to monitor OOSC
  - Sub-component 7.4 – NGO Consortium supporting Foundational Learning and OOSC

The parent Free Education Project supports the construction of new classroom blocks, sanitary facilities, and maintenance/renovation works for a selected number of schools throughout the country. Through sub-component 3.2, the project finance construction of approximately 510 furnished classrooms and three girls' boarding homes. Additionally, school maintenance and renovation grants are provided to approximately 15,20 primary schools to support schools conducting minor maintenance and/or renovation.

As the parent project continues with ongoing construction of classrooms, the following ES risk are expected on a moderate scale:

- nuisances related to air and noise emissions
- health and safety of students, teaching staff, and visitors during the construction and renovation phase
- disposal and management of construction and domestic waste
- traffic management
- Occupational health and safety of workers
- community health and safety
- the risk of Gender-Based Violence (GBV) and
- effects from land acquisition, among others.

The second Additional Finance (AF) is also categorized as Moderate in environmental and social risk, implementing in accordance with the World Bank's Environmental and Social Framework (ESF). The newly added sub-component 3.3 will support the provision of first-aid kits for all government supported schools, enhancing emergency preparedness. No civil work will take place under the AF. Activities in the AF project in Sierra Leone is considered to have no impact on GHG emissions and is not likely to adversely affect the country's low GHG emission development pathway. The operation is consistent with the country's climate strategies and aligns with the goals of the Paris Agreement on both mitigation and adaptation.

The AF is expected to have positive social and environmental impacts, empowering children to acquire further learning, improve early grade quality, increase enrollment and retention, and keep children safe in school. Key positive impacts include: (i) better health outcome for students due to provision of first aid kits for school, and (ii) reduction of violence in school.

The AF design strengthen mitigation measures to address exclusion in basic education, focusing on gender and disability. The ESCP, Stakeholder Engagement Plan, Resettlement Policy Framework, ESMF, and Labor Management Procedures (LMP) were prepared and disclosed in June 2020.

The Free Education Project will comply with the World Bank Environmental and Social Standards (2018). Since the specific schools where these construction works will take place is undetermined at this point, an ESMF is required. The ESMF provides a general impact identification framework to assist project implementers to screen the projects and institute measures to address adverse E&S impacts. Using the E&S screening tool, the E&S specialist of FEPS will identify the potential risks of subprojects and determine which environmental assessment instrument, such as Environmental and Social Impact Assessment (ESIA)s, ESMFs, and Resettlement Action Plan (RAP), that may be required.

The Project Secretariat through the Ministry of Basic and Senior Secondary Education coordinates project activities, including day-to-day implementation, coordination, supervision, and overall management of project activities. Some aspect of the project (component 6 and a subcomponent under component 7) will be managed by NGO consortium. The responsibility for performance monitoring and decision-making of activities performed by the NGO Consortium Program Implementation Unit will lie with the NGO Consortium Program Management Board. This board will consist of the country director of each NGO partner and the chairman of party. The individual in charge of the Non-Governmental Organization (NGO) Consortium Program Implementation Unit will establish a tight working relationship with the Free Education Project Secretariat (FEPS), Ministry of Basic and Secondary Education (MBSSE), Teacher Service Commission (TSC), government representatives at the district level, World Bank, and participating Development Partners (DPs) of the Multi-Donor Trust Fund (MDTF). Additionally, regular monthly meetings will be held with the FEPS during the whole implementation phase. The primary personnel responsible for managing the consortium are as follows: (i) a head of party, (ii) an award manager, (iii) a finance manager, (iv) a monitoring, evaluation, accountability, and learning manager, and (v) an environmental and social protection coordinator.

The Project Implementation Manual (PIM) is undergoing revisions to integrate the new component and proposed changes under the AF. These updates will encompass several aspects such as project design and components, implementation strategies, fiduciary considerations, environmental and social safeguards, as well as monitoring arrangements.

### 3. Environmental and Social Policies, Regulations, and Laws

#### 3.1 Sierra Leone Legal Framework

**Table 1. Sierra Leone Relevant Legal Framework**

Law	Description and Relevance to Project Activities
<b>Environment Regulatory Agency: Environmental Protection Agency (EPA) Sierra Leone Act</b>	<p>The Sierra Leone Environmental Protection Agency Act (EPAA), 2008 and its Supplementary Acts, 2010, mandate companies to meet local legal requirements and demonstrate environmental commitment. The Act emphasizes the processes and procedures leading to the acquisition of an environmental license for fully acceptable ESIA studies and ESMPs. Projects with minimal or moderate environmental and social impacts are classified by the EPASL for licensing purposes. The ESMF is discussed with the agency as a first step in the EIA license application process. Projects with negative environmental impacts or requiring an EIA/ESMP.</p> <p><b>This policy could affect the following subcomponents:</b></p> <p>3.2 Physical Improvements to the Learning Environment</p> <p>1.1 Planning and System Management: Amalgamation of schools</p> <p>1.3 Promoting Gender Equality in Education: to gender issues and restriction to girls fully benefiting from the project. The specific nature of the project area of choice would determine the extent to which this plan is applicable.</p> <p>MBSSE in the Free Education project will work closely with EPASL to meet the local legal requirements and demonstrate commitment to protecting the environment.</p>
<b>The following are policies and related documents establishing or overseen by EPASL:</b>	
<b>The Constitution of Sierra Leone, 1991</b>	<p>The Constitution of Sierra Leone safeguards individuals from property deprivation, ensuring private ownership and enjoyment. Expropriation or compulsory acquisition of private properties is permitted if it promotes public welfare, such as defense, safety, order, morality, health, or town planning. Acquiring property must be accompanied by prompt payment of compensation and access to an impartial court. This applies only to land acquired by the Free Education Project proponent but may not apply to other settlements.</p>
<b>National Biodiversity Strategy and Action Plan (NBSAP) 2017</b>	<p>The National Biodiversity Strategy and Action Plan (NBSAP) is part of Sierra Leones overall development plan. The plan provides details of procedures and processes for the purpose of conservation and sustainable use of Sierra Leones's biodiversity.</p> <p>As with the National Environmental Policy, the Project will conduct work in such a way as to minimize impact to nature, ecosystems, species and their habitats. Whilst there are no national regulations on the proximity of any work area to sensitive ecosystems, no work will take place within 100 m of a wetland, protected forest reserve or marine area, animal/plant sanctuary etc. To avoid externalities, contractors shall strictly follow the ESMP to be developed for the Free Education Project. This policy could affect the subcomponents: 1.2 Physical Improvements to the Learning Environment</p>
<b>Factories Act, 1974</b>	<p>This Act deals with occupational health and safety measures as they concern the factory worker. A Factories Appeal Board is in operation and has the duty of hearing and determining any appeal submitted by factory owners, giving right where it is due. Going by the interpretation of the word factory, as stipulated in this Act, industrial companies are factory-based companies, and are therefore covered by any legislation pertaining to this aspect. MBSSE shall ensure that the contractor protects workers</p>

	and the community from injury or fatality resulting from the project activities in accordance with the Act. The ESMP/EIA to be developed will cover Occupational and Community Health and Safety.
<b>The Ministry of Lands, Housing and the Environment (MLHE)</b>	This Ministry develops appropriate policies and programs for land planning and the environment, though its role is more limited since the formation of the EPA, however, this policy could affect the subcomponents: 1.2 Physical Improvements to the Learning Environment. The specific nature of the project area of choice would determine the extent to which this plan is applicable.
<b>Ministry of Basic and Senior Secondary Education (MBSSE)</b>	MBSSE recognizes and is a partner to sustainable and sound environmental management and the need to protect the environment as proffered by the Policy. MBSSE has therefore embarked on a process to obtain an EIA license before mobilizing resources to commence work. They also recognize the need for synergies amongst all stakeholders. A Stakeholder Engagement Plan has been developed for project implementation.
Local Government Act, 2004	The Local Government Act in Sierra Leone promotes decentralization and establishes local councils with legislative and executive rights. These councils, consisting of elected members and Paramount Chiefs, acquire land, improve settlements, and create development plans. The project will operate in areas controlled by multiple local councils, and companies should involve local councils in development work. MBSSE will collaborate with local councils for project implementation, monitoring, and conflict resolution at the district level.

### 3.2 National Environmental and Social Assessment and Permitting

The Environment Protection Agency, Sierra Leone (EPASL) is responsible for monitoring national environmental policies and ensuring EIA licenses are obtained. The World Bank recommends that environmental and social impact assessments (ESIA) conform to the host country's laws and regulations while following good international industry practice (GIIP). Environment Protection Agency Sierra Leone requires seven stages to identify and manage environmental and social risks. The registration stage involves registering the project proposal and procuring a screening form. The process involves applying to EPASL for an EIA license, completing a screening form, and submitting a scoping report. All projects, either large or small-scale, require an EIA, with category A and B projects requiring a detailed assessment. The report is communicated to the applicant within 21 days.

Table 2. Categories of environmental and social assessment for a project according to EPASL

Category	Nature of assessment required by EPASL	Conditionality
A	Full-scale ESIA study	If the project has the potential to have significant adverse environmental and social impacts that are sensitive, diverse or unprecedented. These impacts may affect an area broader than the sites of facilities subject to physical works.
B	Small-scale ESIA study	If the potential environmental and social impacts are less adverse than those of Category A projects. Typically, these impacts are site-specific; few, if any, are irreversible, and mitigation measures are more readily available.
C	Environmental and Social Management Plan	If the project is unlikely to have adverse environmental and social impacts.

(Source: EPASL regulations)

- Scoping

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. Make available for inspection by the general public in the locality of the proposed undertaking, copies of the scoping report.

Upon completion of the impact studies, the applicant should submit eighteen hard and soft copies of the ESHIA report to the Agency for circulation to Board members, professional bodies and the public for comments.

- Public Hearing and Review of the ESIA Report

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

- A draft environmental impact statement shall be reviewed by the Agency after receipt of recommendations following a public hearing.

Where after review, the draft environmental impact statement is found unacceptable by the Agency, the applicant shall be notified of this in writing and shall be required to submit a revised environmental impact statement 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.

- Decision Making

This is the stage where the ESHIA report is approved or rejected. The Board of the EPA is vested with the power to approve or reject an application for an EIA. Where an environmental impact assessment is acceptable to the Agency, an EIA 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 EIA License will be subject to terms and conditions, and renewal.

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 EIA License invalid after the period. When an application has been rejected by the EPA Board, the applicant has a right to seek legal redress.

- Compliance and Enforcement

This is the implementation stage, environmental monitoring and auditing of the project activities is undertaken to ensure that the terms and conditions of the Environment Impact Assessment license issued are met in accordance with the Environment Protection Agency Act, 2008 as amended in 2010. It is important to note that EPA-SL should be involved through all these stages for guidance and compliance with the provisions of the EPA Act, 2008.

### **3.3 World Bank Standards and Key Gaps with the National Framework**

The project follows the World Bank Environmental and Social Standards (ESSs), as well as the World Bank Group Environmental, Health and Safety Guidelines. Based on these policies, the environmental and social risk of the project is categorized as moderate for both parent project and AF.

A comparative analysis was carried out between the World Bank Environmental and Social Standards (ESS), and Sierra Leonean's legislation applicable to the E&S impacts of development projects. By contrast to the World Bank E&S Framework, Sierra Leonean legislation does not adequately address specific environmental and social issues, necessitating a gap analysis.

Table 3. Gap Analysis between the World Bank ESSs and Sierra Leonean Legislation

<b><i>Issue</i></b>	<b><i>Summary of World Bank ESS Requirements</i></b>	<b><i>Sierra Leone Legislation</i></b>	<b><i>Approach to Address Gaps</i></b>
<i>Project Design</i>	Feasible alternative project designs to avoid or minimize environmental impacts, pollution, sediment transport, air pollution, hazardous wastes physical and/or economic displacement, while balancing environmental, social and financial costs and benefits will be considered.	Acquiring the minimum resources necessary. Provide information regarding possible alternative approaches to minimize environmental and social impacts.	Consistent
<i>Evaluating Environmental and social impacts</i>	In the case of E&S impacts, an ESMF that covers, at a minimum, the applicable requirements of ESS 1-10, regardless of the scale of the impact, will be developed. The ESMF will be designed to mitigate the negative impacts, enhance the positive impacts, identify development opportunities, and develop an ESMF budget and schedule.	The 2008 EPA Act, and its complementary 2010 Act mandates projects with E&S footprint to obtain an EIA license prior to commencement of work. This would involve studies designed to mitigate anticipated impacts.	The Acts do not have corresponding regulations to operationalize their stipulations. Plan to address gaps identified in the ESMF. Where there is discrepancy, the project shall adopt the more stringent standards. Prepare an ESMF consistent with the requirements detailed within the framework analysis.
<i>Labor and working conditions</i>	WB ESS2 promotes safety at work, fair treatment, equal opportunity, and the avoidance of forced or child labor.	The Factories Act (1974) protects workers' safety. There are policies and programs on child and forced labor promoted by the Ministry of Social welfare, gender and Children's Affairs and the Ministry of Labor and Social Services.	The cut-off age for child labor in Sierra Leone is 15 years, whilst that recommended by the ILO, of which the country is a member, is 18 years. The project will adopt the more stringent age of 18 years. Prepare an ESMF that addresses labor and working conditions in a manner that is consistent with the requirements detailed within the framework analysis.



<i>Resource Efficiency and pollution prevention</i>	The ESMF shall promote efficient use of water and energy and prevent pollution (ESS3) and its effect on society and the environment.	No regulation is available on resource use efficiency, but the EPASL Act 2008 & 2010 and procedures encourage the development of efficient alternatives and prevention of pollution. Ozone depleting substances, 2010, that control use of refrigerants helps to prevent climate change.	
<i>Community health and safety</i>	The project will be designed and implemented in a manner that protects the health and safety of communities throughout the project lifecycle in line with ESS 4.	The EPASL EIA requirements cover community safety. Traffic and road safety is under the purview of the Sierra Leone Road Safety Authority, and the Traffic Division of the Sierra Leone Police. Community and road safety is not strictly implemented or monitored.	Prepare an ESMF that protects the health and safety of communities in a manner that is consistent with the requirements detailed within the framework analysis.
<i>Land acquisition, restrictions on land use and involuntary resettlement</i>	In the case of physical displacement, an RPF that covers, at a minimum, the applicable requirements of ESS 5, regardless of the number of people affected has been developed. In the unlikely event of the need for land acquisition and involuntary resettlement, a RAP or an ARAP will be designed based on the RPF to mitigate the negative impacts of displacement, identify development opportunities, develop a resettlement budget and schedule and establish the entitlements of all categories of affected persons (including Host communities). The plan	Whilst there is no national regulation on resettlement, a national policy is being developed. There is no single national document on resettlement.	Prepare a resettlement plan consistent with the requirements detailed in ESS 5.

	should address potential adverse impacts and at the same time make provisions for the opportunity to improve socioeconomic conditions of the affected population.		
<i>Biodiversity conservation and sustainable management of living natural resources</i>	The WB ESS6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and the biodiversity they support	There are national pieces of regulations and international conventions that protect the country's biodiversity and ecosystems, the wildlife Conservation Act, Forestry Act and Regulations, national biodiversity action plan (NBSAP)	Both the local and international regulations and conventions are comprehensive and consistent with the WB ESS6. Prepare an ESMP in line with the framework analysis.
<i>Cultural Heritage</i>	The WB SS8 seeks to protect cultural heritage from the adverse impacts of project activities and support its preservation.		The ESMF has developed a Chance Finds Procedure in accordance with the WB ESS8.
<i>Legal Framework</i>	As well as the Environmental and Social Standards, the ESMF should be consistent with national legislation.	The project should meet the national legislative and regulatory requirements that protect society and the environment. The project must also meet the requirements of international convention ratified, acceded to or recognized by the GoSL.	The local legislation and regulations may not be as stringent as the WB ESF. Where there is discrepancy, the project shall adopt the more stringent standards. Plan to address gaps identified in the ESMF.
<i>Disclosure</i>	The project will publicly disclose the ESMF to key stakeholders and affected communities as early as possible in the project cycle consistent with ESS10. The project will provide periodic reports that describe progress with the implementation of the ESMF. Documents to be disclosed will be in a format	The EPASL disclosure process requires a stakeholder engagement plan (SEP) that encourages timely engagement of stakeholders and project affected parties.	The disclosure process will be made to commence at the project design stage. Once completed, the ESMF will be summarized and disclosed in a form that is simple and accessible to convey key messages to affected people.

	that is accessible to the affected communities.		
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The WB E&S Framework provides a more comprehensive and specific approach to protecting human being and the environment. Where there are gaps between the Sierra Leonean law and the requirements of the WB ESS, the more stringent standards would be adopted, which in most instances are the ESSs.

## 4. Potential Environmental and Social Risk Impacts and Standard Mitigation Measures

**Table 4. Environmental and Social Risks and Mitigation Measures**

Subcomponent Activity	Risks and Impacts	Mitigation Measures
<b>Acquisition of land for construction purposes</b>	Conflict with persons affected by land acquisition over non-payment, delays in payment for land, and unrealistic timelines for execution of a RAP (if any).	Have all agreements signed, compensation packages delivered to PAPs, grievance redress mechanism established, adequate time for movement of PAPs affected by the RAP away from affected property or location
<b>Movement of vehicles and/or machines during the mobilization of materials and commencement of construction activities.</b>	Dust and exhaust gas emission will cause reduction of the ambient air quality. Traffic and haulage of equipment and construction materials on community and access roads will cause deterioration in the quality of air on the site, its environs as well as along haulage routes. Also, the noise level in the project location and adjacent places will increase. This can lead to emotional distress, distraction, and acute hearing issues. Respiratory health impacts caused by motorised vehicles on pedestrians, nearby residents, and site workers.	<u>Air pollution mitigation</u> <ul style="list-style-type: none"> <li>• Consideration of design options for the reduction of traffic congestion.</li> <li>• Personal protective equipment like dust masks shall be provided for all workers.</li> <li>• Vehicles transporting sand and other dust-generating materials will be fully covered with tarpaulin.</li> <li>• Workers in their complete and correct PPE shall always debag cement from vehicles in a well-confined area.</li> <li>• A speed limit of 20 km/h shall be instituted and enforced on the access road and within the project area.</li> <li>• Vehicles and machines shall be regularly and properly maintained.</li> <li>• No vehicle that emits a huge amount of carbon monoxide shall be allowed to work.</li> <li>• The site engineer shall adhere to the manufacturer's servicing and routine maintenance schedules for all construction equipment or service equipment once a month.</li> <li>• Continual air monitoring for particulate matter shall be observed.</li> </ul> <u>Noise pollution mitigation</u> <ul style="list-style-type: none"> <li>• All equipment used shall be fitted with noise suppression devices to reduce noise pollution.</li> <li>• The noise level at the construction site shall not be allowed to cross 85 decibels.</li> <li>• Drivers and operators of vehicles and machines shall switch off the machines when not in use.</li> <li>• Noise level monitoring shall be continuous throughout the construction period.</li> </ul>

		<ul style="list-style-type: none"> <li>• There shall be a restriction on the use of heavy-duty machinery during the day (if a site requires its use). All loud noise and high vibration producing equipment shall be used during off-peak hours of the day like from 9:00 am to 5:00 pm.</li> <li>• If the noise level disturb the nearby residence at a level that is considered damaging to their health (globally considered to be 90dB within the residency) then temporarily removal or compensation should be investigated.</li> </ul>
<b>Employment of workers</b>	Conflict with community people; harassment, child labour, and gender-based violence issues; poor labour and working conditions; HIV/AIDS and other STDs;	<ul style="list-style-type: none"> <li>• Grievance Redress Systems (community based and employee based) will be established to resolve localized conflicts.</li> <li>• Crimes such as theft, rape and defilement will be reported to the nearest police station directly or through the grievance redress committee or elected councilor.</li> <li>• Summary dismissal of employees who engage in criminal activities.</li> <li>• The contractor will be required to update the Labour Management Procedure into a Plan during implementation and comply with its requirement as per the labour management procedure in the ESMF.</li> <li>• The contractor will also be required to establish a worker's GRM to address employee complaints and grievances.</li> <li>• Ensuring that children and minors are not employed directly or indirectly on the project by checking birth certificates of potential employees and/or letting responsible persons'/opinion leaders in their communities e.g., Priests, Civil Servants guarantee their application forms that they are above 18 years.</li> <li>• The contractor supervised by MBSSE will Sensitise contractors' employees on the dangers associated with illicit sexual affairs, rape, and defilement e.g., risk of catching STI and criminality.</li> <li>• Crimes such as theft, rape and defilement will be reported to the nearest police station directly or through the grievance redress committee,</li> <li>• The Contractor supervised by MBSSE's Consultant will organise HIV/AIDs awareness for employees.</li> <li>• Distribute packets condoms to contractor's employees.</li> <li>• Organise STI awareness campaigns in the school.</li> <li>• The bidding documents will include specific requirements that minimize the use of workers from outside the vicinity.</li> <li>• The contract documents for works as well as for monitoring consultants require explicit Codes of Conduct to be signed by all workers.</li> <li>• Periodic mandatory training of all workers on SEA issues and Code of Conduct.</li> <li>• Contractors will be required to develop a comprehensive GBV Action Plan for implementation.</li> <li>• The contractor to partner NGO who will support implementation of the GBV action plan, lead community</li> </ul>

		<p>awareness raising and ensure accompaniment to service providers.</p> <ul style="list-style-type: none"> <li>• MBSSE will establish a GRM that will be GBV sensitive for complaints.</li> <li>• Providing alternative work schedules or shifts to accommodate the hiring of more local female workers.</li> </ul>
<b>Demolition of old buildings containing asbestos and/or other hazardous materials.</b>		<p>If old asbestos roofing/material are encountered during trenching, the following will be undertaken after notifying the supervising engineer:</p> <ul style="list-style-type: none"> <li>• The Asbestos will be dowsed with water and cut into appropriate sizes with snap cutters for easy transportation.</li> <li>• The Asbestos will be wrapped with polythene material and sealed with duct tape to make them airtight. They will be marked as “hazardous material” and transport to the approved Landfill site for burial in lined (geo textiles) pits.</li> <li>• Install warning signs at the burial grounds.</li> <li>• Specialized personnel clothed in rubber coverall with hoods and non-laced rubber boot wearing respiratory protective equipment with a HEPA filter will be used in the removal and disposal of the Asbestos.</li> <li>• If the excavated materials and construction waste contain hazardous materials, they will be transported in trucks lined and cover with tarpaulin to a prepared site at approved final disposal sites and buried in a pit, which will be lined with geo-textile material to prevent seepage. The pit will be covered with the geo-textile material and laterite will be spread to a thickness of 20cm. The area will be fenced, and markers/warning signs will be placed in the vicinity.</li> </ul>
<b>Manual or mechanical site clearing activities, including compaction, site preparation, and excavation.</b>	<p>Removal of topsoil, breakdown of soil structure and expose soil surface. If project activities are carried out in the Wet Season, loose soils will be significantly eroded depending on the intensity of the rain. The period from June to October, which is the wettest time of the year, is the most critical. Rills and gullies could quickly form leading to ponding. Ponds provide breeding ground for mosquitos and malaria. They also pose a health and safety hazard, especially at night. Children and the elderly are most at risk from trips, slips and falls.</p>	<ul style="list-style-type: none"> <li>• The contractor shall minimize or avoid removal of vegetative cover for project work (including areas for storage of construction materials, temporary accumulation of wastes, maintenance and storage of construction machinery and equipment). However, if use of vegetated areas is unavoidable, the topsoil layer (approximately 20cm) shall be removed, kept at specifically designated sites in piles not exceeding 1m for future revegetation. Revegetation is part of a closure or rehabilitation plan.</li> <li>• Construct bunds around worksite, where possible, to contain soil and prevent it from being washed away in the rain.</li> </ul>
<b>Construction waste management.</b>	<p>Pollution of surface water, wetlands and groundwater from sediment runoff, spill and release of hazardous</p>	<ul style="list-style-type: none"> <li>• Establish areas for storage of construction materials and temporary accumulation of wastes; clearly delineate and mark such areas to prevent uncontrolled and excessive dumping.</li> </ul>

	substances and unsafe wastes handling practices.	<ul style="list-style-type: none"> <li>• Maintain requirements for operation of storage facilities for fuel, lubricants, oil, construction materials and chemicals. Locate such materials away from drains, and within a bund (110% the capacity of the containing vessel) as a spill containment measure. The containment area shall be on an impermeable surface to be approved by a Supervising Consultant.</li> <li>• Arrange transportation and disposal of wastes with established procedures and in the approved sites designated for the specific purpose. Ensure timely and regular removal of accumulated waste to approved disposal site to prevent accumulation of wastes on construction sites.</li> <li>• Maintain a buffer zone between construction wastes or excavated earth and drains or wetlands (swamps).</li> <li>• Minimize waste generation, separate recyclable and non-recyclable materials. Recycle bottles and plastic containers, separate out organic waste for composting. The local community can apply the compost or organic waste to their vegetable gardens.</li> </ul>
<b>Water usage during construction.</b>	Generation wastewater: The settlement of construction wastewater in drainages will cause a breeding place for mosquitoes.	<ul style="list-style-type: none"> <li>• Design and construction processes need to be carried out with the consideration of preventing stagnated water.</li> <li>• The strict control of wastewater disposal shall be enforced to prevent the overflow of it into community lands.</li> <li>• Community water sources shall be strictly avoided unless the community people agree on their use.</li> <li>• Materials such as fuel, lubricants, oils, and chemicals shall not be stored onsite during construction.</li> <li>• Waste management during construction shall be proper to avoid waste runoff on into street drainages.</li> </ul>
<b>Workers' daily construction activities and interaction with community people.</b>	Community health and safety issues: During construction activities, vehicular movements will lead to traffic on community roads, and other project activities directly or indirectly affecting the people will cause health-related safety hazards for the communities.	<ul style="list-style-type: none"> <li>• Barriers shall be erected around construction facilities planned to be decommissioned to exclude community from accessing the sites and carting away with materials.</li> <li>• Security officers shall be put on a high alert; where possible, the SL Police shall be brought in to provide extra security.</li> <li>• The cooperation of the local authority shall be sought to communicate hazards to community by coming in contact with hazardous substances.</li> <li>• All containers intended to be donated to the community shall first be detoxified.</li> <li>• The community shall not be allowed on the site until the property has been handed over to MBSSE.</li> </ul>
<b>Workers' daily construction activities including bricklaying, lintels, tie-beams and roof works.</b>	Occupational health and safety issues: Workers would be daily exposed to occupational hazards which could cause accidents, incidents, or even death.	<ul style="list-style-type: none"> <li>• Mitigation measures are covered in Basic Health &amp; safety Practices, and Handling of Chemicals in the Workplace to be included in the ESMP.</li> <li>• Training related to all construction levels and their hazards shall be conducted for all employees.</li> <li>• Containers of left over reagents should be appropriately and adequately labelled to communicate information to the workers and community on the risks and hazards in handling chemicals.</li> <li>• Work at height permit should be requested for to the site foreman and/or EHS Officer.</li> </ul>

		<ul style="list-style-type: none"> <li>• All Safety Data Sheets (SDS) shall remain at the site until closure has been completed.</li> <li>• Contractor's workers shall continue to wear activity-specific PPEs; and apply appropriate precautions when working at heights, in confined spaces, etc.</li> <li>• All required PPE for a safe construction management shall be provided for workers.</li> <li>• Workers shall be continually monitored to abide by their occupational code of conduct.</li> <li>• Machines, vehicles, and equipment shall be regularly checked for maintenance.</li> <li>• The work plan management shall be implemented to the letter.</li> </ul>
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#### 4.1 Risks and Mitigation Measures Specific to Disadvantaged and Vulnerable Groups

Construction of classrooms shall be through out the country and mostly in rural areas. Disadvantaged and vulnerable people to be encountered will include old men and women; children and women; minority tribes.

##### ***Old men and women***

Most communities in Sierra Leone especially in the rural areas consist of men and women in their old age who goes to the farm or engage in other agricultural activities that does not suffice to pay their health nor their nutrition and does not improve their economy.

##### **Mitigation measures**

- Old men and women especially those residing closer to the construction area shall be provided with all required PPE that prevent air pollution especially particulate matter impacts.
- Heavy machinery use shall be limited to working in the afternoon hours; even so, old men and women shall be continually engaged to understand if they are facing any adverse impact.
- The MBSSE shall make provision for the supplies of medicines to old people living close to the project areas.
- The MBSSE will make provision of school materials especially for children of old people who cannot afford the materials.

##### **Children and women**

Women and children will see the construction works as way to market their food stuff to workers in the construction area. Also, children will be curious to observe the construction activities and even play around the area.

##### ***Mitigation measures***

- All construction sites shall be fenced to prevent the entry of uninvited guests especially children and food sellers.
- The communities shall be sensitized on the risks in construction areas.
- Workers shall be warned not to allow food sellers in the construction areas.

##### **Minority tribes**

Before the construction works, workers will be mobilized or employed by contractors. Minority tribes in project areas will be potential marginalized for accessing jobs and other beneficial provisions from the contractor and/or MBSSE.

***Mitigation measure***

- i. Jobs will be provided only to the most qualified skilled or unskilled worker.
- ii. All provisions by the contractor and/or MBSSE will be shared equally among all.

**4.2 Planning and Design Considerations for Avoidance of Environmental and Social Risks and Impacts**

In the early stages of the free education subproject planning and design, several measures were implemented to avoid and minimize environmental and social impacts. These measures are crucial in ensuring that the subproject is developed in a sustainable and responsible manner.

One of the key measures is considering alternative sites. By carefully evaluating different location options, the subproject can be situated in an area that minimizes negative environmental and social effects. This could involve assessing factors such as proximity to natural habitats, communities, and infrastructure, as well as potential impacts on local ecosystems and cultural heritage.

Another important measure is selecting different technologies or methodologies that have lower environmental and social impacts. This involves researching and choosing innovative solutions that prioritize resource efficiency, renewable energy, and minimal waste generation. By embracing sustainable technologies, the subproject can significantly reduce its carbon footprint and contribute to a cleaner and greener future.

Proper waste disposal is also a critical aspect of minimizing environmental and social impacts. Both solid and liquid waste must be managed in a responsible manner to prevent pollution and harm to the environment. This includes implementing waste management systems that promote recycling, reuse, and safe disposal practices. By adopting effective waste management strategies, the subproject can ensure that its operations do not contribute to environmental degradation or pose health risks to nearby communities.

Furthermore, preparing for emergencies is essential to safeguard the safety and well-being of the community. Adequate emergency response plans should be developed to address potential risks and mitigate their impacts. This could involve training personnel, establishing communication protocols, and implementing safety measures to minimize the potential consequences of unforeseen events. By prioritizing emergency preparedness, the subproject can ensure that any disruptions or accidents are promptly addressed, minimizing harm, and ensuring the continued well-being of all stakeholders involved.

In addition to the measures mentioned above, stakeholder engagement and community involvement are vital for minimizing environmental and social impacts. By actively involving local communities, indigenous groups, and other relevant stakeholders in the planning and decision-making processes, their perspectives, concerns, and traditional knowledge can be incorporated into the subproject design. This promotes transparency, inclusivity, and ensures that the subproject aligns with the needs and aspirations of the communities it will impact.

Another important aspect is conducting comprehensive environmental and social impact assessments.



These assessments help identify potential risks, impacts, and mitigation measures associated with the subproject. By conducting thorough studies, potential negative effects on biodiversity, water resources, air quality, cultural heritage, and socio-economic aspects can be identified early on, allowing for appropriate measures to be implemented to minimize or mitigate these impacts.

Monitoring and evaluation are essential throughout the lifecycle of the subproject. Regular monitoring of environmental and social indicators can help identify any unforeseen impacts or changes in conditions. This allows for timely adjustments and corrective actions to be taken to ensure the subproject remains on track in terms of its sustainability and minimizing adverse effects.

Additionally, promoting education and awareness about environmental and social issues within the subproject's scope can contribute to long-term sustainability. By providing training and capacity-building opportunities for project staff, contractors, and local communities, knowledge and understanding of sustainable practices can be enhanced. This empowers individuals and communities to actively participate in the subproject's implementation and contribute to its success.

By incorporating these measures into the subproject design, potential environmental and social impacts can be proactively reduced and mitigated during implementation. This not only contributes to the long-term sustainability and success of the subproject but also demonstrates a commitment to responsible and ethical practices.

## 5. Procedures and Implementation Arrangements

### 5.1 Environmental and Social Risk Management Procedures

The environmental and social risk management procedures will be implemented through the Project's subproject selection process. In summary, the procedures aim to do the following:

**Table 5. Project Cycle and E&S Management Procedures**

Project Stage	E&S Stage	E&S Management Procedures
<b>a. Assessment and Analysis:</b> Subproject identification	Screening	<ul style="list-style-type: none"> <li>- During subproject identification, ensure subproject eligibility by referring to the <b>Exclusion List in table 6</b> below.</li> <li>- For all activities, use the <b>Screening Form in Annex 1</b> to identify and assess potential environmental and social risks and impacts, and identify the appropriate mitigation measures for the subproject.</li> <li>- Identify the documentation, permits, and clearances required under the government's Environmental Regulation.</li> </ul>
<b>b. Formulation and Planning:</b> Planning for subproject activities, including human and budgetary resources and monitoring measures	Planning	<ul style="list-style-type: none"> <li>- Based on <b>Screening Form</b> adopt and/or prepare relevant environmental and social procedures and plans.</li> <li>- For activities requiring Environmental and Social Management Plans (ESMPs), submit the first 5 ESMPs [or another number agreed with the World Bank] for prior review and no objection by the World Bank prior to initiating bidding processes (for subprojects involving bidding processes) and/or launching activities (for subproject activities not subject to bidding).</li> <li>- Ensure that the contents of the ESMPs are shared with relevant stakeholders in an accessible manner and consultations are held with the affected communities in accordance with the SEP.</li> </ul>

		<ul style="list-style-type: none"> <li>- Complete all documentation, permits, and clearances required under the government's Environmental Regulation.</li> <li>- Train staff responsible for implementation and monitoring of plans.</li> <li>- Incorporate relevant environmental and social procedures and plans into contractor bidding documents; train contractors on relevant procedures and plans.</li> </ul>
<b>c. Implementation and Monitoring:</b> Implementation support and continuous monitoring for projects	Implementation	<ul style="list-style-type: none"> <li>- Ensure implementation of plans through site visits, regular reporting from the field, and other planned monitoring.</li> <li>- Track grievances/beneficiary feedback.</li> <li>- Continue awareness raising and/or training for relevant staff, volunteers, contractors, communities.</li> </ul>
<b>d. Review and Evaluation:</b> Qualitative, quantitative, and/or participatory data collection on a sample basis	Completion	<ul style="list-style-type: none"> <li>- Assess whether plans have been effectively implemented.</li> <li>- Ensure that physical sites are properly restored.</li> </ul>

More detail for each stage is provided below.

#### a. Subproject Assessment and Analysis – E&S Screening

Environmental and social screening have been conducted for subproject activities before the commencement of construction and renovation.

**Table 6. Exclusion List**

<ul style="list-style-type: none"> <li>• Support of production of any hazardous good, including alcohol, tobacco, and controlled substances</li> <li>• Any construction in protected areas or priority areas for biodiversity conservation, as defined in national law</li> <li>• Activities that have the potential to cause any significant loss or degradation of critical natural habitats, whether directly or indirectly, or which would lead to adverse impacts on natural habitats.</li> <li>• Activities that involve extensive harvest and sale/trade of forest resources (post, timber, bamboo, charcoal, wildlife, etc.) for large-scale commercial purposes</li> <li>• Activities involving changing forestland into agricultural land or logging activities in primary forest.</li> <li>• Purchase or use of banned/restricted pesticides, insecticides, herbicides, and other dangerous chemicals (banned under national law and World Health Organization (WHO) category 1A and 1B pesticides)</li> <li>• Construction of any new dams or rehabilitation of existing dams including structural and or operational changes; or irrigation or water supply subprojects that will depend on the storage and operation of an existing dam, or a dam under construction for the supply of water.</li> <li>• Activities that involve the use of international waterways</li> <li>• Any activity affecting physical cultural heritage such as graves, temples, churches, historical relics, archeological sites, or other cultural structures.</li> <li>• Activities that may cause or lead to forced labor or child abuse, child labor exploitation or human trafficking, or subprojects that employ or engage children, over the minimum age of 14 and under the age of 18, in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development.</li> <li>• Any activity on land that has disputed ownership or tenure Any activity that will cause physical relocation of households or will require the use of eminent domain.</li> <li>• Any activity with significant environmental and social risks and impacts that require an Environmental and Social Impact Assessment (ESIA)</li> <li>• Any activity that will require Free, Prior and Informed Consent (FPIC) as defined in ESS7.</li> </ul>
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As a second step, the Free Education project Secretariate staff will use the ***E&S Screening Form in Annex 1*** to identify and assess relevant environmental and social risks specific to the activities and identify the appropriate mitigation measures. The *Screening Form* lists the various mitigation measures and plans that are relevant for the specific activities such as the Environmental and Social Codes of Practice, the Environmental and Social Management Plan, the Labor Management Procedures, etc.)

The Free Education project Secretariate staff will also identify the documentation, permits, and clearances required under the government's Environmental Regulation.

### **b. Subproject Formulation and Planning – E&S Planning**

Based on the process above and the Screening Form, the FEPS will adopt the necessary environmental and social management measures already included in the Annexes of this ESMF (such as the ESCOPs, the LMP, etc.) or develop relevant site-specific environmental and social management plans.

The project ESMP will be updated based on the activities from the AF and disclosed accordingly. Teachers and pupils will be trained on the use and disposal of first aid kits waste. The FEPS will provide approval and compile the project ESMPs and the Emergency Preparedness and Response Plan document. The contents of the EPRP documents will be shared with relevant teachers and stakeholders in an accessible manner, and consultations will be held with the affected communities. The updated ESMP will be used until all construction activities are completed.

The first five ESMPs will also be submitted to the World Bank for prior review and no objection. After this first 5, the World Bank and the FEPS will reassess whether prior review is needed for further ESMPs or a certain category of ESMPs (for example, for activities exceeding a certain budget, for certain types of activities).

The FEPS will also complete the documentation, permits and clearances required under the government's Environmental Regulation before any project activities begin.

At this stage, staff who will be working on the various subproject activities should be trained in the environmental and social management plans relevant to the activities they work on. The FEPS will provide such training to field staff.

The FEPS will also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures for civil works. The FEPS will provide training to selected contractors to ensure that they understand and incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by contractors to subcontractors and vendors. The FEPS will further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

### **c. Implementation and Monitoring – E&S Implementation**

During implementation, the project will have regular monitoring visits conducted by the FEPS. These visits will serve as a mechanism to oversee the progress and performance of the project. The responsible parties for project supervision will include the FEPS team, MBSSE, World Bank and relevant stakeholders.

The frequency of the monitoring visits depends on the levels of actors, and requirements of the project. In general, the project will maintain Clerk of Works who provide daily visit to all construction sites; the ES team including the project engineer at project level conduct monthly monitoring visit on the basis to ensure continuous monitoring and evaluation of the project's activities and outcomes.

Although the suppliers will be responsible for distribution of the kits, the teachers and head teachers are responsible for implementing subproject activities, and they are also accountable for implementing the mitigation measures outlined for the first aid kits waste disposal. The FEPs specialists (ES team), council ESO, School Quality Assurance Officers provide oversight and supervision to ensure that the teachers adhere to the specified mitigation measures and guidelines.

These regular monitoring visits, mobile devices for monitoring, and ensuring contractor compliance with E&S risk management documents, have been helpful supervision mechanisms and enhance project performance, thereby ensuring the successful implementation of the project while minimizing potential environmental and social impacts. The environmental and social risks identified in the ESMF are key indicators to be monitored by the FEPS team and the E&S risk management mitigation plans be part of regular project monitoring.

At a minimum, the reporting includes (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP. Reports from the local levels are be submitted to the Free Education project Secretariate staff at the national level, where they are aggregated and submitted to the World Bank on a quarterly basis.

Throughout the Project implementation stage, the Free Education project Secretariate staff continues to provide training and awareness raising to relevant stakeholders, such as staff, selected contractors, and communities, to support the implementation of the environmental and social risk management mitigation measures. An initial list of training needs is provided below, in Section 5.5.

The Free Education project Secretariate staff also tracks grievances/beneficiary feedback (in line with the SEP) during project implementation to use as a monitoring tool for implementation of project activities and environmental and social mitigation measures.

#### **d. Review and Evaluation – E&S Completion**

Upon completion of Project activities, the Free Education project Secretariate staff reviews and evaluates progress and completion of project activities and all required environmental and social mitigation measures. Especially for civil works, the Free Education project Secretariate staff monitors activities with regard to site restoration and landscaping in the affected areas to ensure that the activities are done to an appropriate and acceptable standard before closing the contracts, in accordance with measures identified in the ESMPs and other plans. The sites must be restored to at least the same condition and standard that existed prior to commencement of works. Any pending issues must be resolved before a subproject is considered fully completed. The Free Education project Secretariate staff prepares the

completion report describing the final status of compliance with the E&S risk management measures and submit it to the World Bank.

## **5.2 Third-party Monitoring arrangement, responsibility, and frequency.**

A yearly third-party ES (Environmental and Social) auditing significantly contributes to the success and positive impact of the free education project in Sierra Leone. By conducting a thorough assessment and evaluation of the project's environmental and social aspects, this auditing process can play a crucial role in ensuring the project's sustainability and promoting the overall well-being of the environment and society. The project contracts a third-party ES auditing (local ES consultant) to assess the project's compliance with environmental regulations and standards. It thoroughly examined whether the project activities adhere to the established guidelines and do not harm or degrade natural resources, such as forests, water bodies, or wildlife habitats. This assessment is essential to ensure that the project operates in an environmentally responsible manner and minimizes any negative impact on the surrounding ecosystems.

Moreover, the auditing process evaluates the social implications of the free education project. It can analyze how the project affects local communities, indigenous peoples, and vulnerable groups within the society. This assessment can help identify any potential social inequities or exclusionary practices and ensure that the project promotes inclusivity, equal access to education, and social equity. By addressing these social aspects, the project can contribute to the overall development and well-being of the community.

In addition to assessing compliance and evaluating social impacts, the third-party ES auditing can identify potential risks associated with the project and propose effective measures to minimize them. This can include strategies to prevent pollution, promote proper waste management, and ensure the sustainable use of resources. By proactively addressing these risks, the auditing process can help the free education project mitigate any potential negative consequences and operate in a manner that aligns with sustainable practices.

Lastly, the third-party ES auditing can provide valuable recommendations for improving the project's environmental and social performance. This may involve suggesting the incorporation of sustainable practices, such as renewable energy sources or eco-friendly infrastructure, to minimize the project's carbon footprint. Additionally, the auditing process can recommend community engagement initiatives to foster collaboration and ensure that the project aligns with the needs and aspirations of the local community.

The activity can enhance its sustainability, minimize negative impacts on the environment and society, and contribute to the overall well-being of the country. By assessing compliance, evaluating social implications, identifying risks, and providing recommendations, this auditing process ensures that the project operates in an environmentally responsible and socially inclusive manner, thus creating a positive and lasting impact on Sierra Leone's education system and its people.

Last, if the Free Education project Secretariate staff becomes aware of a serious incident in connection with the project, which may have significant adverse effects on the environment, the affected communities, the public, or workers, it should notify the World Bank within 48 hours of becoming aware of such incident. A fatality is automatically classified as a serious incident, as are incidents of forced or

child labor, abuses of community members by project workers (including gender-based violence incidents), violent community protests, or kidnappings.

### 5.3 Contingency Emergency Response Component

The Contingency Emergency Response Components (CERC) Manual to be prepared for the Project will include a description of the environmental and social risk assessment and management arrangements if the CERC component becomes activated. This may include a CERC ESMF or an Addendum to this ESMF based on the subproject activities that will be funded under the CERC component. If such additional documentation or revision to documentation is needed, the Free Education project Secretariate staff will prepare, consult, adopt, and disclose these in accordance with the CERC Manual, and implement the measures and actions necessary.

### 5.4 Implementation Arrangements

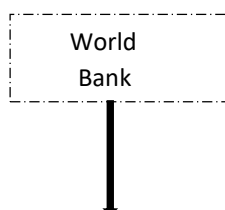
The updated AF2 ESMF is implemented by Free Education Project Secretariat (FEPS) established within the MBSSE and headed by the FEPC). S/he shall report to the Minister through the Permanent Secretary on E&S compliance during project implementation. The Secretariat consists of 4 personnel in addition to the FEPC, namely,

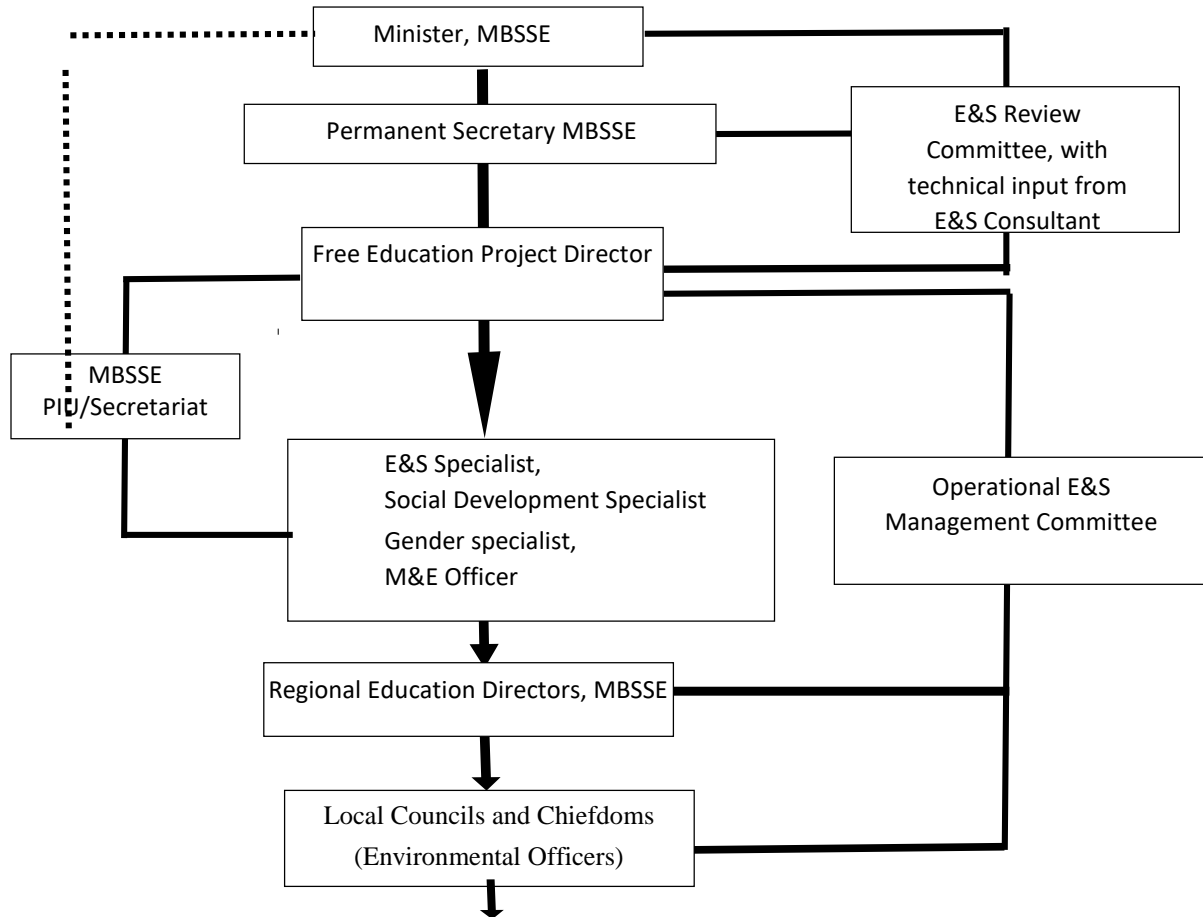
- i. Environmental Specialist
- ii. Social Development Specialist
- iii. Gender specialist

However, the first aid kit implementation of the Af2 will be led by the FEPS Environmental specialist, who will provide training and orientation for local implementing staff from LC and MBSSE, namely the ESO and the School quality Assurance Officers (SQAOS) respectively. The SQAOS are charged with the responsibility to promote school health and sanitation. These staff would be committed to conduct monitoring and supervision; however, they would need capacity building through training and mentorship from the FEPS. The above LC and MBSSE staff are not engaged in the parent project and would serve as an opportunity for their engagement. The SQAOS from MBSSE and ESOs are in the best position to support distribution of first Aid kits.

The FEPS serves as an interface between the MBSSE and the Bank. The Organizational chart for the implementation of EHS is illustrated in **Error! Reference source not found..**

Figure 1. The Organizational chart for the implementation of ESMF/ESMP





### ***Establishment and role of E&S Committees***

The ESMF is supervised by two committees and several personnel. An overarching E&S Management Review Committee headed by the Minister of MBSSE at national level and a Local E&S Management Committee that operates at the field level.

#### ***a) National E&S Management Review Committee***

The Minister, PS, and FEPC, with the help of an E&S consultant reviews the progress in ESMF implementation on a quarterly basis to ensure its suitability, adequacy and effectiveness, and determines if there is need for any necessary modification.

#### ***b) Local E&S Management Committee***

This committee comprises of the FEPC, the Deputy Education Directors, Local Councils and Chiefdoms. Their primary role is monitoring of the implementation of the ESMF at the field level. They also play the following roles:

- a. Ensuring the effective implementation of environmentally related operational controls and programmes;

- b. The internal communication of environmental matters between the PIU and contractor and employees; and working with the E&S Consultant to promote environmental awareness among contractor staff;
- c. Assist with the review of complaint records, nonconformity, corrective action and preventive action reports and the adoption of preventive actions as necessary;
- d. Any other E&S activities that are assigned by the PIU;
- e. Holding regular meetings with the contractor (at approximately *monthly* intervals).

#### *Roles and Responsibilities for Implementation of the ESMF*

The roles and responsibilities of the Bank, FEP Secretariat of the MBSSE, E&S Consultant and Project Contractor relative to implementation of the ESMF/ESMP are defined in Table 7. The responsibilities identified in the following table are not inclusive of all responsibilities, but highlight key elements related to environmental and social performance that each entity is responsible for.

Table 7: Key Environmental and Social Roles and Responsibilities

Entity	Responsibilities
<b>Project Implementation Unit</b>	
<b>MBSSE</b>	<p><b>MBSSE</b> is the main project partner for the Free Education Project.</p> <ul style="list-style-type: none"> <li>The minister leads the political coordination within government agencies, in general and for any environmental and social issues that arise.</li> <li><b>The Permanent Secretary</b> is accountable for upholding the Environmental and Social Commitment Plan and ensure that Free Education Project is implemented as per the ESMF.</li> <li>Regularly update the Minister on E&amp;S compliance by the project. Project Oversight, management, and endorsement. Serves as the link between the project and GoSL.</li> <li>Designate a Program Implementation Team consisting of individuals who will lead MBSSE's engagement with Project activities, including regular communication and proactive coordination with the World Bank and with the consultants engaged by MBSSE.</li> </ul>
Free Education Project secretariate (FEPS)	<ul style="list-style-type: none"> <li>The Secretariat will also work with the Bank, MBSSE, consultants and contractors, as well as respective project stakeholders. The Secretariat shall also lead the coordination of the development of the ESMF and management plans for all areas targeted for the Free Education Project. It shall receive support from the Bank, and the E&amp;S and Resettlement Consultant.</li> <li>The Secretariat has overall responsibility for managing environmental and social performance issues for all Free Education Project activities and monitors the implementation of all projects to ensure compliance of MBSSE, the contractor and consultants with this ESMF.</li> <li>Day-to-Day custodian of the World Bank E&amp;S Framework and ESS.</li> <li>Day to day management and responsibility for the oversight of environmental and social implementation for the Project and ensuring compliance with World Bank E&amp;S Framework and ESS.</li> <li>In coordination with World Bank, develop project work plans that establish tasks, timelines and the roles and responsibilities of MBSSE, World Bank staff, and MBSSE consultants.</li> <li>Support the procurement and management of contractors including preparation of draft terms of reference and to finalize procurement documents.</li> </ul>



Entity	Responsibilities
	<ul style="list-style-type: none"> <li>• Participate on evaluation panels to select consultants.</li> <li>• Identify and establish the targeted beneficiaries. Stakeholder engagement and communication, as well as land acquisition and resettlement efforts, (where applicable) are activities to be supervised by MBSSE.</li> <li>• Provide the World Bank with feedback on consultant performance in order to support the Bank's initiatives to track contractor performance across its portfolio.</li> <li>• Responsible for taking part in joint communications and outreach activities associated with the Project to both solicit and receive feedback from the public on Project implementation.</li> <li>• Provide data through regular and ad hoc reports to the World Bank, as necessary to meet the requirements of the Bank's Monitoring and Evaluation Plan.</li> </ul>
The FEPS is constitutes of the following personnel:	
a) Environmental and Social specialist	<ul style="list-style-type: none"> <li>• Accountable for implementation of commitments at the Project, including environmental and social commitments and mitigation measures as set out in the relevant impact assessments and in accordance with this ESMF.</li> <li>• Screening of sub projects guided by environmental and social screening checklist list.</li> <li>• Contribute to the identification of environmental and social risks; management plans and ERP.</li> <li>• Incorporate ESMF/ESMP guidelines in contractors' agreement.</li> <li>• Undertake ES auditing and evaluation of the project implementation including GBV and SEA Assist in supervising the activities of the contractor to ensure compliance; working closely with the Regional E&amp;S Officer;</li> <li>• Contribute to implementation of stakeholders Engagement Plan (SEP),</li> <li>• Develop for approval by the Consultant and the Bank all training material and conduct training. Where the contractor does not have the competence to conduct training, the Consultant shall provide the requisite training to contractor's workers.</li> <li>• Ensure construction works and activities are carried out in accordance with the Bank's expectations, the E&amp;S Framework and ESS, and all relevant Project commitments.</li> <li>• Ensure that monitoring to be undertaken during construction is implemented.</li> <li>• Ensure that health and safety requirements are adhered to.</li> <li>• Conduct health and safety inductions for all visitors to work site including identification of risk. Maintain visitors' log.</li> <li>• Identify and define environmental and social roles, responsibility and authorities within their organization.</li> <li>• Ensure that human, technical and financial resources are provided where essential to the implementation and control of the environmental and social management.</li> <li>• Ensure environmental and social plans, procedures and control mechanisms are prepared, implemented, evaluated, and improved on a continued basis, including planning, risk assessment &amp; risk response measures, monitoring &amp; evaluation etc.</li> <li>• Report environmental and social performance to the Consultant, in accordance with requirements.</li> <li>• Conducts EHS assessments and evaluations and participates in external/internal audits, to ensure any non-conformities are identified, managed and closed out effectively.</li> <li>• Ensure development of accident reports and track accident statistics.</li> </ul>

Entity	Responsibilities
	<ul style="list-style-type: none"> <li>Co-ordinate investigation of incidents and accidents, as well as other EHS-related concerns and complaints.</li> <li>Ensure the environmental and social competency of all Project personnel through co-ordination of critical personnel, appropriate training.</li> </ul>
b) Social Development Specialist	<ul style="list-style-type: none"> <li>Oversight social aspects of the project including the implementation of RPF and RAPs.</li> <li>Assisting the Resettlement Consultant with implementation and monitoring of the RAP, also for capacity building purposes; s/he is expected to learn by doing; working closely with the Regional E&amp;S Officer.</li> </ul>
c) Communications Officer	<ul style="list-style-type: none"> <li>Project plan and activity communication</li> <li>Responsible for developing tools for communicating planned project activities to all stakeholders; tools that would messages easily comprehensible (e.g. radio and media, use of town criers, etc.)</li> <li>Communication and awareness initiatives.</li> <li>Ensure all relevant documentation is managed in accordance with Program Standards, including legal requirements.</li> </ul>
d) Gender Specialist	<ul style="list-style-type: none"> <li>Monitoring and mitigation of GBV and SEA.</li> </ul>
e) M&E Officer	<ul style="list-style-type: none"> <li>Monitoring, evaluation, data processing and analysis</li> <li>Responsible for tracking implementation of all project activities and progress made on each of the Project's PDO-level and intermediate results indicators as laid out in the Project's Results Framework; Lead the development and implementation of the ESMF monitoring plan</li> </ul>
<b>Regional Coordinators</b>	
<b>a)</b> MBSSE Deputy Director or <b>b)</b> (Clerk of Works)	<p>Works closely with the Free Education Project Specialist in the review, update and day-to-day management of ESMF, which includes-</p> <ul style="list-style-type: none"> <li>E&amp;S Compliance implementation and monitoring</li> <li>Has overall Project-level responsibility for environmental and social risk management and program implementation on-site during construction works</li> <li>Identification of environmental and social risks and impacts</li> <li>Development of management programs (ESMP, CEMP, ERP, etc.)</li> <li>E&amp;S compliance supervision</li> </ul>
c) Local Council and chieftdom (Environmental Officers)	<ul style="list-style-type: none"> <li>E&amp;S Compliance implementation and monitoring</li> <li>Work closely with the Secretariat's E&amp;S Officer; Contribute to the identification of environmental and social risks; management plans and ERP; Assisting the Environmental Consultant with E&amp;S monitoring for capacity building purposes; s/he is expected to learn by doing; assist in supervising the activities of the contractor to ensure compliance; working closely with the Regional E&amp;S Officer; Contribute to implementation of stakeholders Engagement Plan (SEP), monitoring and mitigation of GBV and SE.</li> </ul>

### Institutional Needs

Organization capacity and competency of this ESMF is discussed under the following categories:

- MBSSE ESMF organizational capacity and competency

- Organizational capacity and competency of national institutions and beneficiary entities relevant to the implementation of the Free Education Project.

#### *MBSSE's ESMF Competencies*

This Ministry is the custodian of the Free Quality Education and is implementing the World Bank funded Free Education Project, therefore benefits from some of the capacity building program of the project. For it to be able to provide the oversight functions, the MBSSE needs to build capacity around management of the environmental and social protection practices. This will help the ministry to undertake sector monitoring of its divisions and facilities.

The MBSSE has a staff that is versed in community outreach and engagement, but it does not have an environment, health and safety (EHS) unit within its institution, neither does it have environment-related policy, or EHS as a core value. There are no documented protocols on protection of school environments, waste management and pollution control, or workplace safety.

This could have negative implications for the ministry's image and public perception, safety of staff, teachers and pupils in general, and the ability to implement the ESMF/ESMP to be developed.

It is based on the lessons learnt in the implementation of the REDiSL project, that the parent Project Secretariat was set up to implement the Free Education Project. The Project Secretariat is established with the responsible for overseeing the implementation of the project with support from the Directorate of Planning and carrying out day-to-day management of the project, with the support of each of the three component leads. The Secretariat also undertake coordination activities related to project implementation, ensuring alignment with DP activities and ensuring involvement of key stakeholders in the education sectors as appropriate.

For the implementation of activities under AF1 (component 6), Save the Children led NGO consortium has been engaged, successfully implemented activities, and overachieved some of the targets. Based on that experience, some activities under AF2 have been planned to be implemented by the NGO consortium.

#### *Local Council's ESMF Competencies*

Local councils were established to enable meaningful decentralization and devolution of Government functions. In accordance with the 2004 Local Government Act, local councils are the highest political authority in the districts, with legislative and executive powers. They however suffer from incomplete devolution and resource availability. Training and capacity building can be provided from sub-units within these councils responsible for environmental management. This can be done in collaboration with EPASL.

#### **ESMF Resources**

The Secretariat (or and their designated staff) will work with MBSSE management, as per the E&S Commitment Plan to ensure that adequate resources have been committed to allow for the effective implementation of the ESMF, and subsequent management plans. Similarly, the Secretariat, consultants, and contractors will be required to assign personnel resources sufficient to carry out the requirements of their environmental and social action plans (ESMPs, resettlement plans, and any other action plan that is required to comply with the World Bank ESS). The Secretariat shall also be required to allocate budgetary provisions made by the Bank for the designated purpose. These shall include, but not limited to the following:

- Environmental and social studies and impact assessments, including permitting fees
- Environmental and social management costs

- Cost of environmental and resettlement issues and monitoring
- Capacity Building for MBSSE, the Project Secretariat and other stakeholders
- Engagement of Environmental and Social Specialists (if any)
- Environmental and Social Due Diligence investigations (if any)
- Monitoring and evaluation

## **5.5 Capacity Building and Training**

As mentioned in section above, environmental management and social protection systems are weak and not instituted in most of the national institutions and beneficiary entities of the Free Education Project. The projects and the Project Secretariat, together with the Bank must play a major role in building the capacities of these institutions in sound environmental management, health and safety, and good working conditions of their staff.

### ***Project Secretariat/PIU***

To achieve and maintain the level of expertise required for the implementation of this ESMF, the Secretariat team will coordinate a training program for all relevant MBSSE employees, consultants, contractors, sub-contractors, and sub-consultants, using the ESMF and associated management plans. Training will be primarily on-the-job, complemented by workshops and, when appropriate, classroom instructions. To maintain the appropriate level of awareness and competence, refresher training will be held periodically, and all new employees will be given a summary of ESP requirements when they join MBSSE.

Members of the Secretariat will participate in ESP colleges upon approval of the Bank. Other national or international conferences and workshops on environmental and social safeguards, particularly those of the World Bank will be good opportunities for the MBSSE to improve their skills in relation to effective ESMF implementation and environmental and social performance of the Free Education Project. The Secretariat works with MBSSE and the World Bank to identify appropriate conferences and provide the necessary budget. An immediate training requirement identified for all Secretariat staff are first aid, health, safety and fire management, and defensive driving.

### ***Training of PIU Staff***

Training programmes to equip the PIU staff members (responsible for facilitating implementation of the ESMF) and the consultants in using the environmental assessment tools will be organized by the Environment Protection Agency.

The FEPS staff and consultants will form the core group of trainers that will train the district and chiefdom/ward personnel and the Project Appraisal Team in environmental assessment.

Training needs will be assessed, but key aspects to be considered include:

- Linkages between environment and development
- Basic concepts in environment and ecology
- Environmental issues at the district level, and implications for the Free Education sub-projects
- Role of Environmental Assessment
- System for Environmental Assessment

- Tools for Environmental Assessment
- Field techniques for Environmental Assessment
- Legislative and regulatory framework
- Terms of reference for environmental assessment
- Mitigation measures
- Climate change adaption and mitigation measures

### ***Training of Trainers***

A core group of trainers from every district comprising the staff of the FEPS, Deputy Director and Inspector of schools will be trained by the E&S Consultant.

The training will involve an initial orientation workshop, a main training programme and refresher-training programmes. The orientation workshop will be organized in two batches. It will be for a duration of one day. The main and refresher training programme will be organized in five batches each. Each batch will have about 10 participants.

This training will be organized at the regional level, for a duration of 4-5 days. The refresher training programmes will be organized twice every year. In all ten such refresher training programmes will be organized.

### ***Training of Chiefdom/ward Committee and Appraisal Team***

The core group of trainers will then train the local committee and the Appraisal Team members in environmental assessment. Although the local committee will be at the chiefdom and ward level, an Appraisal Team (AT) will be set up at the district level, headed by the Deputy Director of the MBSSE in that district. The training will involve an initial orientation session, a main training programme and refresher-training programmes.

Induction training will form part of the orientation session for the chiefdom/ ward committee and AT. Depending on the scale and distribution of the subprojects, the main and refresher training programmes will be organized in batches. Each training programme will be for duration of 2-3 days.

The training program will consist of sessions in the following topics:

- Role of Environmental Assessment
- Process of Environmental Assessment
- Tools for Environmental Assessment
- Screening (for levels 1&2)
- Pollution Control and Prevention
- Waste management, reuse, recycling and minimization;
- Hazardous substances
- Environmental issues of the district and the implications for the Free Education project
- Environmental Education and Awareness
- Occupational and community health and safety
- Emergency preparedness and response

- Climate change adaption and mitigation measures

The methodology of the training will include hands-on environmental assessment of subprojects in addition to exposure visits, interactions with resource persons and group exercises.

### ***The Contractor***

Within the classroom construction component, specific trainings and skills will be required in relation to environmental and social protect and health and safety, and all training should be conducted in partnership with the Secretariat to promote a learning by doing approach and be consistent with the procedures and standards provided by this document. The specific trainings required will be determined by the E&S Consultant hired for the institutional strengthening aspect of the project with approval from the World Bank.

For all construction contracts, training will take place during the mobilization of the construction contractor to ensure their key staff have adequate knowledge of environmental, social, health and safety management principles and awareness of their environmental and social contractual requirements prior to commencement of works. This training will include a brief introduction to policy and legal requirements, environmental and social documents developed for the project (the ESMF, the ESMP, OHS Guidelines and Waste Management Plan), the responsibilities of various entities and communication among them, environmental and social mitigation, required permits and approvals, monitoring and reporting requirements, information disclosure and communication. In addition to general classroom training, special sessions will be organized for groups of workers dealing with machinery and equipment, workers involved in handling of hazardous materials and waste, drivers, people working in confined spaces, etc. Furthermore, depending on the nature of planned works, on-the-job instructions and guidance for workers will be provided by the site supervisors of the construction contractors daily. This training will be led by the E&S Consultant with support as needed from the Secretariat, and it is the responsibility of the construction contractor to ensure information received at the training is disseminated to all required staff and workers.

### ***The Community***

Training and workshop sessions will be held with project affected communities both prior to and during the construction to help prepare the communities for transformations that will occur in their communities, such as construction works, potential for elevated levels of noise and dust, traffic and influx of workers. The community will be educated on the risk of contracting STDs and STIs upon sexual interaction with construction workers, the risk of social conflicts and how these could be mitigated. They would also be informed of tools at their disposal, such as the GRM channels, stakeholder engagement and communication mechanisms. Women will be enlightened on the mitigation of GBV and SEA and SH (sexual harassment and sexual exploration and abuse are the most common types of GBV that occur in such projects), and the degree of commitment of the Free Education Project to protect gender rights and entitlements.

**Table 8. Proposed Training and Capacity Building Approach –**

Level	Responsible Party	Audience	Topics/Themes that May Be Covered
National level	World Bank	National staff responsible for overall	ESMF and approach: - Identification and assessment of E&S risks - Selection and application of relevant E&S risk management measures /instruments

		implementation of ESMF	<ul style="list-style-type: none"> <li>- E&amp;S monitoring and reporting</li> <li>- Incident and accident reporting</li> <li>- Application of LMP, including Code of Conduct, incident reporting, SEA/SH, COVID-19 mitigation</li> <li>- Application of SEP and the grievance/beneficiary feedback mechanism</li> </ul>
<b>Regional level</b>	National staff	Regional staff  Contractors	ESMF and approach: <ul style="list-style-type: none"> <li>- Identification and assessment of E&amp;S risks</li> <li>- Selection and application of relevant E&amp;S risk management measures</li> <li>- E&amp;S monitoring and reporting</li> <li>- Incident and accident reporting</li> <li>- Application of LMP, including Code of Conduct, incident reporting, SEA/SH, COVID-19 mitigation</li> <li>- Application of SEP and the grievance/beneficiary feedback mechanism</li> <li>Climate change mitigation and adaptation</li> <li>Waste management and reduction</li> </ul>
<b>Regional level</b>	National teachers	School teachers	First aid kit training for teachers Waste management and reduction Climate change mitigation and adaptation Waste management and reduction
<b>Local/site level</b>	Regional staff	Local staff  Local contractors	<ul style="list-style-type: none"> <li>- Application of SEP and the grievance/beneficiary feedback mechanism</li> <li>- Application of LMP, including Code of Conduct, incident reporting, SEA/SH, COVID-19 mitigation</li> <li>- Application of ESCOPs or ESMPs, as relevant</li> <li>-Climate change mitigation and adaptation</li> <li>Waste management and reduction</li> </ul>
<b>Community level</b>	Local staff	Community members  Community Workers, if relevant	<ul style="list-style-type: none"> <li>- Basic OHS measures and Personal Protective Equipment</li> <li>- Community health and safety issues</li> <li>- Worker Code of Conduct</li> <li>- SEA/SH issues, prevention, measures]</li> <li>- COVID-19 mitigation</li> <li>- Grievance redress</li> <li>- Workers' grievance redress</li> <li>- E S monitoring and compliance</li> <li>- Solid waste management and reduction</li> <li>-Climate change mitigation and adaptation</li> </ul>
<b>Staff training E S</b>	<b>Training for Clerk of works</b>	Clerk of works	ESMF and approach: <ul style="list-style-type: none"> <li>- Identification and assessment of E&amp;S risks</li> <li>- Selection and application of relevant E&amp;S risk management measures/instruments</li> <li>- E&amp;S monitoring and reporting</li> <li>- Incident and accident reporting</li> <li>- Application of LMP, including Code of conduct</li> <li>-Climate change mitigation and adaptation</li> <li>-Waste management and reduction</li> </ul>

## 5.6 Estimated Budget

The following table lists estimated cost items for the implementation for the ESMF, which have been included in the overall project budget:

**Table 9. ESMF Implementation Budget –**

No	Activity/Cost Item	Potential Cost (USD)
1	Trainings for staff on environmental and social requirements of the project (venue, travel, refreshments etc.)	20 000
2	Trainings for contractors (venue, travel, refreshments, etc.)	5 000

3	Printing of awareness raising materials on environmental and social requirements including the grievance redress materials	5 000
4	Cost of obtaining clearances or permits	20 000
5	First Aid kit usage monitoring and supervision by ESO) and SQAOs	40 000
6	Travel and accommodation budget for national environmental and social staff site visits (national E&S staff shall coordinate site visits with monitoring visits by ESOs and SQAOs under #5).	20000
	<b>TOTAL</b>	105 000

No additional ESMF budget is needed for AF activities.

## 6. Stakeholder Engagement, Disclosure, and Consultations

A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. The SEP can be found here: [https://mbsse.gov.sl/wp-content/uploads/2023/07/SEP\\_-SL-Free-Education\\_AF2\\_2023.pdf](https://mbsse.gov.sl/wp-content/uploads/2023/07/SEP_-SL-Free-Education_AF2_2023.pdf), July 11, 2023.

This ESMF, as well as the SEP and the Environmental and Social Commitment Plan (ESCP) that have been prepared for this project, have been disclosed in draft for stakeholder consultations on the following website [https://mbsse.gov.sl/wp-content/uploads/2023/07/ESCP\\_-SL-Free-Education\\_AF2\\_CLEAN-1.pdf](https://mbsse.gov.sl/wp-content/uploads/2023/07/ESCP_-SL-Free-Education_AF2_CLEAN-1.pdf) July 11, 2023.



## Annex 1. Screening Form

The E&S Screening procedure comprises of two stages-process: (1) Initial screening by using the **Exclusion List** in Table 5 of the ESMF; and (2) Screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the Project ESF file. The World Bank may review a sample of the forms during implementation support visits.

### 1. Subproject Information:

Subproject Title	
Subproject Location	
Regional Unit in Charge	
Estimated Cost	
Start/Completion Date	
Brief Description of Subproject	

### 2. Environmental and Social Screening Questionnaires

Questions	Answer		Next Steps
	Yes	No	
ESS1			
1. Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria?			If "Yes": Exclude from project.
2. Does the subproject involve <u>new construction or significant expansion</u> of ponds, solid waste management systems, shelters, roads (including access roads), community centers, schools, bridges and jetties?			If "Yes": 1. Prepare a site-specific E&S Assessment and/or ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
3. Does the subproject involve <u>renovation or rehabilitation</u> of any small-scale infrastructure, such as groundwater wells, latrines, showers/washing facilities, or shelters?			If "Yes": 1. Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the questions below raises specific environmental risks and requires a site-specific ESMP). 2. Include E&S risk management measures in bidding documents.
4. Will construction or renovation works require new borrow pits or quarries to be opened?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
5. Does the project lead to any risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable. <sup>1</sup>			If "Yes": Apply relevant measures described in the ESMF and SEP.
ESS2			

<sup>1</sup> "Disadvantaged or vulnerable" refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or ethnic peoples status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits.

6. Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?			If "Yes": Exclude from project.
7. Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers?			If "Yes": Apply LMP in Annex 4.
8. Will the workers be exposed to workplace hazards that needs to be managed in accordance with local regulations and EHSGs? Do workers need PPE relative to the potential risks and hazards associated with their work?			If "Yes": Apply LMP in Annex 4.
9. Is there a risk that women may be underpaid when compared to men when working on the project construction?			If "Yes": Apply LMP in Annex 4.
<b>ESS3</b>			
10. Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
11. Do any of the construction works involve the removal of asbestos or other hazardous materials?			If "Yes": Apply asbestos guidance provide in the ESCOP
12. Are works likely to cause significant negative impacts to air and / or water quality?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
13. Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
14. Is there any potential to have impact on soil or water bodies due to agro-chemicals (e.g., pesticides) used in farmlands due to the consequences of the subproject activities (e.g., development of irrigation system, agriculture related activities, seed and fertilizer assistance, procurement of pesticides)?			If "Yes": Apply Fertilizer and Pest Management Plan in Annex 7.
<b>ESS4</b>			
15. Is there a risk of increased community exposure to communicable disease (such as COVID-19, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?			If "Yes": Apply LMP in Annex 4 and relevant measures in SEP.
16. Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?)			If "Yes": Apply LMP in Annex 4.
17. Is there a risk that SEA/SH may increase as a result of project works?			If "Yes": Apply LMP in Annex 4.
18. Would any public facilities, such as schools, health clinic, church be negatively affected by construction?			If "Yes": Apply relevant measures based on the ESCOPs in Annex 2 (unless one of the other questions in the screening form raises specific environmental and social risks and requires a site-specific ESMP).
19. Will the subproject require the government to retain workers to provide security to safeguard the subproject?			If "Yes": Prepare a site-specific ESMP for the proposed subproject, including an

			assessment of potential risks and mitigation measures of using security personnel.
<b>ESS5</b>			
20. Will the subproject require the involuntary acquisition of new land (will the government use eminent domain powers to acquire the land)? <sup>2</sup>			If "Yes": Refer to and apply the project Resettlement Framework (RF).
21. Will the subproject lead to temporary or permanent physical displacement (including people without legal claims to land)?			If "Yes": Refer to and apply the project RF.
22. Will the subproject lead to economic displacement (such as loss of assets or livelihoods, or access to resources due to land acquisition or access restrictions)?			If "Yes": Refer to and apply the project RF.
23. Has the site of the subproject been acquired through eminent domain in the past 5 years, in anticipation of the subproject?			If "Yes": Refer to and apply the project RF.
24. Are there any associated facilities needed for the subproject (such as access roads or electricity transmission lines) that will require the involuntary acquisition of new land?			If "Yes": Refer to and apply the project RF.
25. Is private land required for the subproject activity being voluntarily donated to the project? <sup>3</sup>			If "Yes": Refer to and apply the project RF.
<b>ESS6</b>			
26. Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats <sup>4</sup> whether directly or indirectly, or which would lead to adverse impacts on natural habitats <sup>5</sup> ?			If "Yes": Exclude from project.
27. Will the project involve the conversion or degradation of non-critical natural habitats?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
28. Will this activity require clearance of mangroves?			If "Yes": Exclude from project.

<sup>2</sup> Environmental and Social Standard 5, Footnote 10: "In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached."

<sup>3</sup> Environmental and Social Standard 5, Footnote 10: "In some circumstances, it may be proposed that part or all of the land to be used by the project is donated on a voluntary basis without payment of full compensation. Subject to prior Bank approval, this may be acceptable providing the Borrower demonstrates that: (a) the potential donor or donors have been appropriately informed and consulted about the project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land. The Borrower will maintain a transparent record of all consultations and agreements reached."

<sup>4</sup> Environmental and Social Standard 6, paragraph 23: "Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) Habitat of significant importance to endemic or restricted-range species; (c) Habitat supporting globally or nationally significant concentrations of migratory or congregatory species; (d) Highly threatened or unique ecosystems; and (e) Ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d)."

<sup>5</sup> Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

29. Will this activity require clearance of trees, including inland natural vegetation?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Exclude from project if more than <b>x</b> hectares of tree and vegetation cutting is expected. 2. Include E&S risk management measures in bidding documents.
30. Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?			If "Yes": Exclude from project.
<b>ESS7</b>			
31. Are there any Indigenous Peoples or Sub-Saharan African Historically Underserved Traditional Local Communities present in the subproject area and are likely to be affected by the proposed subproject negatively?			If "Yes": Prepare an Indigenous Peoples Plan OR Include the requirements of an Indigenous Peoples Plan in the SEP.
<b>ESS8</b>			
32. Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?			If "Yes": Apply Chance Find Procedures in Annex 5.
33. Locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?			If "Yes": Apply Chance Find Procedures in Annex 5.

### 3. Conclusion

Based on the result from the screening above, please list the E&S risk management instruments to be prepared / adopt and implemented:

- a)
- b)

**Name and title of person who conducted screening:**

**Date of screening:**

## Annex 2. Environmental and Social Codes of Practice (ESCAP)

To manage and mitigate potential negative environmental impacts, the project applies Environmental Codes of Practice (ESCAPs); outlined in this document. The ESCAPs contain specific, detailed and tangible measures that would mitigate the potential impacts of each type of eligible subproject activity under the project. They are marked as relevant for the planning phase, the implementation phase, or the post-implementation phase of activities. They are intended to be simple risk mitigation and management measures, readily usable to the Borrower and contractors.

The ESCAPs in this section are divided into:

- a. ESCAPs for infrastructure subprojects (general guidelines and technical guidelines)
- b. ESCAPs for delivery of non-food items
- c. *ESCAPs for Infrastructure Subprojects*

### General ESCAP for Infrastructure Subprojects

Issue	Environmental Prevention/Mitigation Measures	Responsible Party
1. Noise during construction	<ol style="list-style-type: none"> <li>a) Plan activities in consultation with communities so that noisiest activities are undertaken during periods that will result in least disturbance. (Planning phase)</li> <li>b) Use when needed and feasible noise-control methods such as fences, barriers or deflectors (such as muffling devices for combustion engines or planting of fast-growing trees). (Implementation phase)</li> <li>c) Minimize project transportation through community areas. Maintain a buffer zone (such as open spaces, row of trees or vegetated areas) between the project site and residential areas to lessen the impact of noise to the living quarters. (Implementation phase)</li> </ol>	
2. Soil erosion	<ol style="list-style-type: none"> <li>a) Schedule construction during dry season. (Planning phase)</li> <li>b) Contour and minimize length and steepness of slopes. (Implementation phase)</li> <li>c) Use mulch, grasses or compacted soil to stabilize exposed areas. (Implementation phase)</li> <li>d) Cover with topsoil and re-vegetate (plant grass, fast-growing plants/bushes/trees) construction areas quickly once work is completed. (Post-Implementation phase)</li> <li>e) Design channels and ditches for post-construction flows and line steep channels/slopes (e.g., with palm fronds, jute mats, etc.). (Post-Implementation phase)</li> </ol>	
3. Air quality	<ol style="list-style-type: none"> <li>a) Minimize dust from exposed work sites by applying water on the ground regularly during dry season. (Implementation phase)</li> <li>b) Avoid burn site clearance debris (trees, undergrowth) or construction waste materials. (Implementation phase)</li> <li>c) Keep stockpile of aggregate materials covered to avoid suspension or dispersal of fine soil particles during windy days or disturbance from stray animals. (Implementation phase)</li> <li>d) Reduce the operation hours of generators /machines /equipment /vehicles. (Implementation phase)</li> <li>e) Control vehicle speed when driving through community areas is unavoidable so that dust dispersion from vehicle transport is minimized. (Implementation phase)</li> </ol>	

4. Water quality and availability	<p>a) Activities should not affect the availability of water for drinking and hygienic purposes. (Implementation phase)</p> <p>b) No soiled materials, solid wastes, toxic or hazardous materials should be stored in, poured into or thrown into water bodies for dilution or disposal. (Implementation phase)</p> <p>c) Avoid the use of waste water pools particularly without impermeable liners.</p> <p>d) Provision of toilets with temporary septic tank. (Implementation phase)</p> <p>e) The flow of natural waters should not be obstructed or diverted to another direction, which may lead to drying up of river beds or flooding of settlements. (Implementation phase)</p> <p>f) Separate concrete works in waterways and keep concrete mixing separate from drainage leading to waterways. (Implementation phase)</p>	
5. Solid and hazardous waste	<p>a) Segregate construction waste as recyclable, hazardous and non-hazardous waste. (Implementation phase)</p> <p>b) Collect, store and transport construction waste to appropriately designated/controlled dump sites. (Implementation phase)</p> <p>c) On-site storage of wastes prior to final disposal (including earth dug for foundations) should be at least 300 metres from rivers, streams, lakes and wetlands. (Implementation phase)</p> <p>d) Use secured area for refuelling and transfer of other toxic fluids distant from settlement area (and at least 50 metres from drainage structures and 100 metres from important water bodies); ideally on a hard/non-porous surface. (Implementation phase)</p> <p>e) Train workers on correct transfer and handling of fuels and other substances and require the use of gloves, boots, aprons, eyewear and other protective equipment for protection in handling highly hazardous materials. (Implementation phase)</p> <p>f) Collect and properly dispose of small amount of maintenance materials such as oily rags, oil filters, used oil, etc. Never dispose spent oils on the ground and in water courses as it can contaminate soil and groundwater (including drinking water aquifer). (Implementation phase)</p> <p>g) After each construction site is decommissioned, all debris and waste shall be cleared. (Post-Implementation phase)</p>	
6. Asbestos	<p>a) If asbestos or asbestos containing materials (ACM) are found at a construction site, they should be clearly marked as hazardous waste. (Implementation phase)</p> <p>b) The asbestos should be appropriately contained and sealed to minimize exposure. (Implementation phase)</p> <p>c) Prior to removal, if removal is necessary, ACM should be treated with a wetting agent to minimize asbestos dust. (Implementation phase)</p> <p>d) If ACM is to be stored temporarily, it should be securely placed inside closed containers and clearly labeled. (Implementation phase)</p> <p>e) Removed ACM must not be reused. (Implementation and post-implementation phase)</p>	
7. Health and Safety	<p>a) When planning activities of each subproject, discuss steps to avoid people getting hurt. (Planning phase)</p> <p>It is useful to consider:</p> <ul style="list-style-type: none"> <li>• Construction place: Are there any hazards that could be removed or should warn people about?</li> <li>• The people who will be taking part in construction: Do the participants have adequate skill and physical fitness to perform their works safely?</li> </ul>	

	<ul style="list-style-type: none"> <li>• The equipment: Are there checks you could do to make sure that the equipment is in good working order? Do people need any particular skills or knowledge to enable them to use it safely?</li> <li>• Electricity Safety: Do any electricity good practices such as use of safe extension cords, voltage regulators and circuit breakers, labels on electrical wiring for safety measure, aware on identifying burning smell from wires, etc. apply at site? Is the worksite stocked with voltage detectors, clamp meters and receptacle testers?</li> </ul> <p>b) Mandate the use of personal protective equipment for workers as necessary (gloves, dust masks, hard hats, boots, goggles). (Implementation phase)</p> <p>c) Follow the below measures for construction involve work at height (e.g. 2 meters above ground (Implementation phase):</p> <ul style="list-style-type: none"> <li>• Do as much work as possible from the ground.</li> <li>• Do not allow people with the following personal risks to perform work at height tasks: eyesight/balance problem; certain chronic diseases – such as osteoporosis, diabetes, arthritis or Parkinson’s disease; certain medications – sleeping pills, tranquillisers, blood pressure medication or antidepressants; recent history of falls – having had a fall within the last 12 months, etc.</li> <li>• Only allow people with sufficient skills, knowledge and experience to perform the task.</li> <li>• Check that the place (eg a roof) where work at height is to be undertaken is safe.</li> <li>• Take precautions when working on or near fragile surfaces.</li> <li>• Clean up oil, grease, paint, and dirt immediately to prevent slipping; and</li> <li>• Provide fall protection measures e.g. safety harness, simple scaffolding/guard rail for works over 4 meters from ground.</li> </ul> <p>d) Keep worksite clean and free of debris on daily basis. (Implementation phase)</p> <p>e) Provision of first aid kit with bandages, antibiotic cream, etc. or health care facilities and enough drinking water. (Implementation phase)</p> <p>f) Keep corrosive fluids and other toxic materials in properly sealed containers for collection and disposal in properly secured areas. (Implementation phase)</p> <p>g) Ensure adequate toilet facilities for workers from outside of the community. (Implementation phase)</p> <p>h) Rope off construction area and secure materials stockpiles/ storage areas from the public and display warning signs including at unsafe locations. Do not allow children to play in construction areas. (Implementation phase)</p> <p>i) Ensure structural openings are covered/protected adequately. (Implementation phase)</p> <p>j) Secure loose or light material that is stored on roofs or open floors. (Implementation phase)</p> <p>k) Keep hoses, power cords, welding leads, etc. from laying in heavily traveled walkways or areas. (Implementation phase)</p> <p>l) If school children are in the vicinity, include traffic safety personnel to direct traffic during school hours, if needed. (Implementation phase)</p> <p>m) Control driving speed of vehicles particularly when passing through community or nearby school, health center or other sensitive areas. (Implementation phase)</p> <p>n) During heavy rains or emergencies of any kind, suspend all work. (Implementation phase)</p>	
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	o) Fill in all earth borrow-pits once construction is completed to avoid standing water, water-borne diseases and possible drowning. (Post-Implementation phase)	
8. Other	a) No cutting of trees or destruction of vegetation other than on construction site. [Implementing agency] will procure locally sourced materials consistent with traditional construction practices in the communities. (Planning phase) b) No hunting, fishing, capture of wildlife or collection of plants. (Implementation phase) c) No use of unapproved toxic materials including lead-based paints, un-bonded asbestos, etc. (Implementation phase) d) No disturbance of cultural or historic sites. (Planning and implementation phases)	

#### Specific ESCOPs for Infrastructure Subprojects

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
<b>Buildings</b>		
In general	a) Provide adequate drainage in the building's immediate surroundings to avoid standing water, insect related diseases (malaria, etc.) and unsanitary conditions. (Implementation phase) b) Include sanitary facilities such as toilets and basins for hand-washing. (Implementation phase) c) Restrict use of asbestos cement tiles as roofing. (Implementation phase) d) Tiled floors are preferred for easier cleaning and more hygienic. (Planning and implementation phases)	
Shelters, community centers, schools, kindergartens.	a) Design of schools, community centres, markets should follow relevant requirements on life and fire safety required by National Building Codes and relevant guidelines from the concerned Ministries. (Planning phase) b) Schools: Maximise natural light and ventilation systems to minimise needs for artificial light and air conditioning; use large windows for bright and well-ventilated rooms. (Planning phase)	
<b>Water Supply</b>		
Shallow Groundwater Wells	a) Site wells so that appropriate zone of sanitary protection can be established. (Planning phase) b) Equip with slab around the well for easy drainage, a crossbeam and a pulley to support the use of only one rope and bucket for collecting water. One rope and bucket is more hygienic for the well and water. (Implementation phase) c) Install steel steps/rungs (inside wall of a deep well) for maintenance and in case of emergency. (Implementation phase) d) A groundwater well usually has a wide open water area. It is necessary to provide a cover/roof/wire mesh on top to protect this area from falling leaves or debris. (Implementation phase) e) Wells should always be located upstream of the septic tank soak-away. Build the soak-away as far away as possible from the well (minimum 15 m/50 feet) as it can influence the quality of the drinking water when it is too close.-(Planning and implementation phases) f) Before using a new water source, test water quality and when intended for potable purposes ensure water meets the national drinking water standard. Water quality should also be monitored in the case of all well rehabilitation. (Post implementation phase)	
Spring	a) Every spring capture should be equipped with a filter and a sand trap. Add a wall between the inflow and the outlet pipe to create chamber for settling out sand; build the wall with a notch (lowered section) for controlled flow. Sand must be cleaned out periodically (operation and maintenance). (Implementation and post-implementation phases) b) Collection basin for spring capture needs to have a perforated PVC pipe (holes diameter 2mm) to be used as a screen for the water intake. Alternatively, a short pipe	



Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
	<p>with wire mesh (screen) around the open end should be provided. (Implementation phase)</p> <p>c) Collection basin needs to have a fence to protect the spring from public access and risk of contamination; and a roof/cover over the spring to prevent leaves or other debris from entering the basin. (Implementation phase)</p>	
Rainwater harvesting	<p>a) Rainwater storage reservoir should be intact, connected to roof gutter system, with all faucets and piping intact. (Implementation phase)</p> <p>b) If distribution pipes are attached into the storage reservoir, install the distribution pipes 10cm above the storage/tank bottom for better use of the storage capacity. (Implementation phase)</p> <p>c) Cover must be fitted tightly onto the top of the storage reservoir to avoid overheating and growth of algae (from direct sunlight), and to prevent insects, solid debris and leaves from entering the storage tank. (Implementation phase)</p> <p>d) A ventilation pipe with fly screen should be placed in the cover to help aerate the tank/reservoir which is necessary for good water quality. (Implementation phase)</p> <p>e) Roof gutters need to be cleared regularly, as bird and animal feces and leaf litter on roofs or guttering can pose a health risk if they are washed into the reservoir tank. (Post-implementation phase)</p> <p>f) Reservoir tanks need an overflow so that in time of really heavy rain, the excess water can drain away. The overflow should be designed to prevent backflow and stop vermin/rodents/insects entering the system. A good design will allow the main storage tank to overflow at least twice a year to remove built up of floating sediment on the top of the stored water and maintain good water quality. (Planning and implementation phases)</p>	
Installation / Rehabilitation of pipelines	<p>Preventing contamination at water sources:</p> <p>a) Build a structure with roof over the water source to prevent leaves or other debris from entering into the basin. (Implementation phase)</p> <p>b) A fence is needed to protect the water sources (springs particularly) from public access and risk of contamination. (Implementation phase)</p> <p>c) The sand/gravel filter traps sediment before the spring flow enters the collection chamber and has to be changed during periodical maintenance. (Implementation and post-implementation phases)</p> <p>Pipe Laying:</p> <p>a) PVC water transmission and distribution piping need to be buried underground (coverage 50cm minimum) to prevent pipe against external damage (e.g. passing vehicles, solar UV radiation, etc.). Exposing PVC pipe to UV radiation causes the plasticizer in the PVC pipe to evaporate causing loss of integrity and brittleness. (Implementation phase)</p> <p>b) Pipe shall be laid in a straight line, over a constantly falling slope. (Implementation phase)</p> <p>c) When conditions do not allow piping to be buried (i.e. pipe is used above ground), then metal pipe must be used, and supported/braced as excessive movement may lead to leaks and breaks. (Implementation phase)</p> <p>d) Outlet pipes and fittings from water storage/basin shall not be PVC pipe due to exposure to solar UV/sunlight. Metal piping and fittings are preferred. (Implementation phase)</p> <p>e) When the distribution pipes are laying via forest area, the following considerations are needed (Planning and implementation phases):</p> <ul style="list-style-type: none"> <li>The route must be considered with minimum effects of changing the existing situations of the forest as well as the least habitats area of the animals</li> <li>Setbacks distances from important natural features (e.g. mineral licks, wildlife features such as nest, leks, dens, staging areas, lambing areas, calving areas) to conserve wildlife values should be kept, if necessary.</li> </ul>	
<b>Electrification</b>		

Subproject Type	Environmental Prevention/Mitigation Measures	Responsible Party
Solar power supply	a) Tidy wiring for easy maintenance and reduces the risk of accidents. (Implementation phase) b) Need to raise community awareness on electrical hazards and health and safety concerns, as well as proper maintenance of solar panels (Implementation and post-implementation phases) c) Need to raise community awareness on proper disposal of solar panels, specifically avoiding disposal of panels near water bodies (Post-implementation phase)	
<b>Access to Sanitation</b>		
Public latrines/toilets	a) All toilets must have a septic tank made from non-permeable material such as concrete, plastic or fiberglass to provide primary treatment of fecal waste. (Implementation phase) b) PVC pipe used to connect pour-flush toilet to a septic tank must be buried underground or covered over (with cement) for protection and to prevent exposure to sunlight. (Implementation phase) c) Metal pipe is a preferred choice to be used as the gas vent pipe on septic tanks. Never use PVC pipe as it is unable to withstand long-term exposure to sunlight. (Implementation phase) d) A toilet should be at least 20 meters from water sources (well, spring, river). (Planning and implementation phases)	
<b>Wastewater Systems</b>		
Wastewater sewerage and treatment	a) Septic tanks must have a vent pipe to prevent the build-up of gas inside the chamber and shall have a 'manhole' that provides access inside the tank if needed. (Implementation phase) b) Ensure that the septic tanks have two chambers: first chamber is for settling of sludge, and the second chamber is for aerobic treatment. These chambers will generally treat wastewater better. Partially treated septic tank effluent can pollute groundwater and surface water. (Implementation phase) c) Do not discharge septic tank effluent to an open drain or other surface water. The effluents need to be treated before final disposal. This may be achieved through: (i) an underground leach field, (ii) a vegetated leach field, or (iii) a pit for soaking away. (Implementation phase) d) Community awareness should be raised so that the community inspects the septic tanks periodically and ensures that the septic tanks are emptied every few years for the tank to continue to function properly. (Implementation and post-implementation phases)	
Solid Waste Management	a) Solid waste depots/disposal need to be located on hard-standing areas that prevent waste entering surface or groundwater. (Implementation phase) b) Waste depots/storage/disposal should be contained, sealed and/or roofed/covered to prevent storm water contamination. Wastes need to be emptied regularly. (Implementation phase)	

*a. ESCOPs for Delivery of Food and Non-food Items*

**ESCOPs for Delivery of Food and Non-food Items**

Risk/Concern	Environmental Prevention/Mitigation Measures	Responsible Party
Non-food Item	- Conduct due diligence during the procurement process and the vendor selection that the non-food commodities to be received will be delivered in good condition and quality control is performed during intake. (Planning phase)  - For storage, select storage facilities and locations based on surveying the relevant characteristics, considering factors such as quality of construction, state of repairs, road	

	<p>access, and sustainability. Regularly inspect these warehouse storage facilities for perimeter fencing, cleanliness, ventilation, lighting and fire prevention. (Implementation phase)</p> <p>- Assess the effects of moisture, humidity and temperature in food storage warehouses and for transportation and take appropriate mitigation and management measures to ensure that food quality and safety are not impacted by these factors. Regularly monitor warehouse storage facilities for temperature, moisture and humidity given the particular inventory of food items stored and regularly inspect warehouses for non-food quality. Similar minimum measures for non-food safety should be included in the contracts of transportation services providers and inspected regularly. (Implementation phase)</p> <p>- For pest management, for each warehouse, conduct a site-specific pest (insect and rodent) assessment, prepare a pest control plan, procure and utilize relevant insect and rodent control equipment, as well as procure and apply relevant pest management measures. Regular food storage warehouse inspections should include inspection of the implementation of the pest control regime. (Implementation phase)</p>	
Solid waste management	<p>- Procure food aid commodities with an aim to minimize packaging; minimize the potential for unmanaged waste; and minimize the type of packaging materials that may have adverse impacts on the environment, and on community health and safety, to the extent technically and financially feasible. (Planning phase)</p> <p>- During transportation, storage and distribution processes, collect all solid waste generated, establish a short term covered storage area on site, and store all solid waste, including food packaging, at these storage area sites. Upon completion of distribution in communities and with relevant frequency in storage warehouses, remove waste from the storage area sites and dispose of waste in relevant off-site facilities designated by local township authorities. (Implementation phase)</p> <p>- For possible solid waste generated after distribution (food packaging that will be discarded later), raise community awareness on where and how to dispose of such packaging, in designated covered storage areas in communities or in IDP camps. (Implementation and post-implementation phases)</p>	

## Annex 3. Environmental and Social Management Plan (ESMP) Template

Environmental and social risks and impacts are strongly linked to subproject location and scope of activities. This ESMP should be customized for each specific subproject location and activities.

### 1. Subproject Information

<b>Subproject Title:</b>	
<b>Estimated Cost:</b>	
<b>Start/Completion Date:</b>	

### 2. Site/Location Description

<p><i>This section concisely describes the proposed location and its geographic, ecological, social and temporal context including any offsite investments that may be required (e.g., access roads, water supply, etc.). Please attach a map of the location to the ESMP.</i></p>
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### 3. Subproject Description and Activities

*This section lists all the activities that will take place under the subproject, including any associated activities (such as building of access roads or transmission lines, or communication campaigns that accompany service provision).*

### 4. ESMP Matrix: Risk and Impacts, Mitigation, Monitoring

*This section should identify anticipated site-specific adverse environmental and social risks and impacts; describe mitigation measures to address these risks and impact; and list the monitoring measures necessary to ensure effective implementation of the mitigation measures. It may draw from the ESMF's pre-identification of potential risks/impacts and mitigation measures, as applicable, and drill down further to ensure relevance and comprehensiveness at the site-specific level. For subprojects involving construction, two sets of tables may be needed, for the construction phase and the operation phase.*

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Impact Mitigation		Impact/Mitigation Monitoring		
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location and Frequency	Responsibility

### 5. Capacity Development & Training

*Based on the implementation arrangements and responsible parties proposed above, this section outlines any capacity building, training or new staffing that may be necessary for effective implementation.*

### 6. Implementation Schedule and Cost Estimates

*This section states the implementation timeline for the mitigation measures and capacity development measures described above, as well as a cost estimate for the implementation. The cost estimate can focus on the line items that will be covered by the project implementing agency, with costs of mitigation measures to be implemented by the contractor left to the contractor to calculate.*

### 7. Attachments

ESCAPs, site specific SEP etc.

### IV. Review & Approval

<b>Prepared By:</b> .....(Signature) <b>Position:</b> ..... <b>Date</b> .....	
<b>Reviewed By:</b> .....(Signature) <b>Position:</b> ..... <b>Date</b> .....	<b>Approved By:</b> .....(Signature) <b>Position:</b> ..... <b>Date</b> .....

## Annex 4. Simplified Labor Management Procedures

In accordance with the requirements of World Bank's Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions, a simplified LMP have been developed for the project. The LMP sets out the ways in which [implementing agency] will manage all project workers in relation to the associated risks and impacts. The objectives of the LMP are to: Identify the different types of project workers that are likely to be involved in the project; identify, analyze and evaluate the labor-related risks and impacts for project activities; provide procedures to meet the requirements of ESS 2 on Labor and Working Conditions, ESS 4 on Community Health and Safety, and applicable national legislation.

The Labor Management Procedures apply to all project workers, irrespective of contracts being full-time, part-time, temporary or casual. The types of workers that will be included in the project are listed below:

- **Direct workers** – [based on the definition of direct workers in ESS2, list the types of direct workers expected to be employed by the Project].
- **Contracted workers** – [based on the definition of contracted workers in ESS2, list the types of contracted workers expected to be employed by the Project].
- **Community workers** – [if relevant, based on the definition of community workers in ESS2, list the types of community workers expected to be employed by the Project or certain Project activities which may use the labor of community workers].
- **Primary supply workers** – [if relevant, based on the definition of primary supply workers in ESS2, list the types of primary supply workers connected to the Project or certain Project activities which may benefit from the labor of primary supply workers].

### *Labor Risks*

The following potential labor risks are identified under the project:

- Violation of worker's rights: Terms and conditions of employment of workers may not be consistent with national legislation or World Bank standards
- Violation of worker's rights: Non-discrimination and equal opportunity of workers may not be consistent with national legislation or World Bank standards
- Use of child labor or forced labor
- Unsafe work environment and poor working conditions
- Workplace injuries and accidents, particularly when operating construction equipment, when working at height on building construction, and when handling heavy equipment and materials
- Risks from exposure to hazardous substances (dust, cement, chemicals used in construction etc.)
- Sexual exploitation and abuse/sexual harassment (SEA/SH) risks for workers
- SEA/SH risks for community members, from workers from outside the project areas
- Conflicts between workers and communities
- Transmission of COVID-19 among workers or nearby communities, especially if workers are not hired locally and arrive to civil works locations from elsewhere or if COVID-19 specific precautions are not in place at work sites and worker accommodation sites

### *Relevant National Labor Legislation*

#### *General Applicable Procedures*

[Implementing agency] and contractors will apply the following guidelines when dealing with workers:

- There will be no discrimination with respect to any aspects of the employment relationship, such as: Recruitment and hiring; compensation (including wages and benefits; working conditions and terms of employment; access to training; job assignment; promotion; termination of employment or retirement; or disciplinary practices.
- Harassment, intimidation and/or exploitation will be prevented or addressed appropriately.
- Special measures of protection and assistance to remedy discrimination or selection for a particular job will not be deemed as discrimination.
- Vulnerable project workers will be provided with special protection.
- [Implementing agency] and contractors will provide job / employment contracts with clear terms and conditions including rights related to hours of work, wages, overtime, compensation and benefits, annual holiday and sick leave, maternity leave and family leave. Code of Conduct included in this LMP will be applicable for all project workers.
- [Implementing agency] will ensure compliance with the Code of Conduct including providing briefings/awareness raising on the Code.
- [Implementing agency] and contractors will ensure compliance with occupational health and safety procedures and COVID-19 specific procedures (see below) including that the workers are properly trained in application of the standards that are relevant to the work.
- [Implementing agency] and retained contractors will ensure no person under the age of 18 shall be employed. Age verification of all workers will be conducted by the contractors.
- [Implementing agency] will recruit contractors and labor locally to the extent that they are available.
- Workers shall be recruited voluntarily, and no worker is forced or coerced into work.
- [Implementing agency] will supervise and monitor to ensure compliance with the above requirements.
- All workers will be made aware of the Worker's Grievance Mechanism (see below) to raise work related grievances, including any sensitive and serious grievances on SEA/SH.

#### *Occupational Health and Safety (OHS) Procedures*

The objective of the procedure is to achieve and maintain a healthy and safe work environment for all project workers (contracted workers and community workers) and the host community.

- On procurement for contractors, [Implementing agency] will avail the ESMF to the aspiring contractors so that contractors include the budgetary requirements for OHS measures in their respective bids.
- The contractor will develop and maintain an OHS management system that is consistent with the scope of work, which must include measures and procedures to address all the following topics listed below and in accordance with local legislation and GIIP (as defined by World Bank Group EHSs). The management system must be consistent with the duration of contract and this LMP.
- Contractor will conduct workplace hazards identification and adopt all applicable E&S risk mitigation measures in accordance with local legislation requirements and WBG EHSs.
- Contractor designates a responsible person to oversee OHS related issues at the project site and define OHS roles and responsibilities for task leaders and contract managers.
- Contractor should put in place processes for workers to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health, without fear of retaliation.

- Contractor provides preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances informed by assessment and plan. Whenever PPEs are required for the work, it must be provided at no cost for the workers.
- Contractor should assess workers' exposure to hazardous agents (noise, vibration, heat, cold, vapors, chemicals, airborne contaminants etc.) and adopt adequate control measures in accordance with local regulations and WB EHSGs.
- Contractors provides facilities appropriate to the circumstances of the work, including access to canteens, hygiene facilities, and appropriate areas for rest. Where accommodation services are provided to project workers, policies will be put in place and implemented on the management and quality of accommodation to protect and promote the health, safety, and well-being of the project workers, and to provide access to or provision of services that accommodate their physical, social and cultural needs.
- Contractor provides for appropriate training/induction of project workers and maintenance of training records on OHS subjects.
- Contractor documents and reports on occupational incidents, diseases and incidents as per ESMF guidance.
- 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, labor unrest and security.
- Contractor provides remedies for adverse impacts such as occupational injuries, deaths, disability and disease in accordance with local regulatory requirements and Good International Industry Practices.
- Contractor shall maintain all such record for activities related to the safety health and environmental management for inspection by [implementing agency] or the World Bank.

#### *COVID-19 Procedures*

- Contractors should ensure that workers are hired locally to the extent possible.
- Contractors should provide training to all workers on signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular handwashing and social distancing) and what to do if they or other people have symptoms, as well as policies and procedures listed here. Training of workers should be conducted regularly, providing workers with a clear understanding of how they are expected to behave and carry out their work duties. Training should address issues of discrimination or prejudice if a worker becomes ill and provide an understanding of the trajectory of the virus, where workers return to work following infection.
- A summary of basic guidelines and COVID-19 symptoms should be displayed at all civil works sites, with images and text in relevant ethnic languages.
- Workers who are sick or showing possible symptoms should not be allowed on work site, should be isolated and referred to local medical facilities immediately.
- Contractors should review worker accommodation arrangements to see if they are adequate and designed to reduce contact with the community.
- Contractors should review work arrangements, tasks and hours to allow social distancing.
- Contractors should provide workers with appropriate forms of personal protective equipment.
- Contractors should ensure handwashing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places at the work site.
- [Implementing agency] and contractors should together implement a communication strategy with the community in relation to COVID-19 issues on the site.



### *Contractor Management Procedures*

The objective of this procedure is to ensure that [implementing agency] has contractual power to administer oversight and action against contractors for non-compliance with the LMP.

- [Implementing agency] will make available relevant documentation to inform the contractor about requirements for effective implementation of the LMP.
- [Implementing agency] will include the provisions of the ESMF, LMP and other relevant documents into the specification section of the bidding documents. The contractors will be required to comply with these specifications.
- Contractor will raise worker awareness on the Code and Conduct.
- Contractor will show evidence of OHS and Emergency Preparedness procedures.
- [Implementing agency] will monitor contract's E&S performance during its regular site visits utilizing contractor reporting or external monitoring/supervision consultants where available. Where appropriate, [implementing agency] may withhold contractor's payment or apply other contractual remedies as appropriate until corrective action(s) is/are implemented on significant non-compliance with the LMP, such as failure to notify [implementing agency] of incidents and accidents.

### *Procedures for Primary Suppliers*

The objective of the procedure is to ensure that labor-related risks, especially child and forced labor as well as serious safety issues to the project from primary supply workers are managed. [Implementing agency] and all contractors will undertake the following measures:

- Procure supplies from legally constituted suppliers.
- To the extent feasible, conduct due diligence to ensure that primary suppliers conduct age verifications, employ workers without any force or coercion, and maintain basic OHS systems.

### *Procedures for Community Workers*

Community workers include people [provide a clear description of who community workers are/who these procedures will apply to]. The objective of this procedure is to ensure the community workers offer their labor voluntarily and that they agree to the terms and conditions of employment. [Implementing agency] and contractors using community workers will apply the following guidelines when dealing with community workers:

- [Implementing agency] will develop standard working times, remuneration systems (depending on the type of work), methods of payment, timing of payment, and community worker Code of Conduct, which will apply to all project activities.
- [Implementing agency] and contractors should consult communities and document their community meetings where members agree to conditions of community worker recruitment. The agreement should include details on nature of work, working times, age restrictions (18 and above), remuneration amount, method of payment, timing of payment, individual signatory or representative signatory of meeting resolution
- Contractors will have the terms and conditions discussed, explained, negotiated and documented through joint community meetings, with each community employee showing consent through signing the attendance register of the meeting which made the employment resolutions.



- [Implementing agency] and contractors train community workers on key LMP issues, including SEA/SH, OHS, COVID-19, safe use of equipment and lifting techniques, and the relevant grievance mechanisms.

#### *Worker Accommodation*

If accommodations are provided for workers, contractors will ensure that they are provided in good hygiene standards, with fresh drinking water, clean beds, restrooms and showers, clean bedrooms, good illumination, lockers, proper ventilation, safe electrical installation, fire and lightening protection, separate cooking and eating areas. There will be separate facilities provided for men and women. The contractors will be liable to comply with "Workers' Accommodation: Processes and Standards: A guidance Note" by IFC and the EBRD.

#### *Institutional Arrangement for Implementation of the LMP*

[Implementing agency] will carry the main responsibility for the implementation and monitoring of the LMP. [Responsible parties at the implementing agency] will identify subproject activities, prepare subproject designs and bidding documents, as well as procure contractors. [Responsible parties at the implementing agency] will be responsible for contractor and site supervision, technical quality assurance, certification, and payment of works. [Responsible parties at the implementing agency] will ensure that labor management procedures are integrated into the specification section of the bidding documents and the procurement contracts.

#### *Grievance Mechanism*

There will be a specific Workers Grievance Mechanism (Worker GM) for project workers as per the process outlined below. This considers culturally appropriate ways of handling the concerns of direct and contracted workers. Processes for documenting complaints and concerns have been specified, including time commitments to resolve issues. Workers will be informed about the relevant Worker GM upon their recruitment and their right to redress, confidentiality and protection against any reprisals from the employer will be stated in the contract.

### **Routine Grievances**

The process for the Worker GM is as follows:

- Any worker may report their grievance in person, by phone, text message, mail or email (including anonymously if required) to the contractor as the initial focal point for information and raising grievances. For complaints that were satisfactorily resolved by the aggrieved worker or contractor within one week of receipt of complaint, the incident and resultant resolution will be logged and reported monthly to the [responsible parties at the implementing agency].
- If the grievance is not resolved within one week, the contractor (or the complainant directly) will refer the issue to the [responsible parties at the implementing agency – this may be site level, local, regional]. The [responsible parties at the implementing agency – this may be site level, local, regional] will work to address and resolve the complaint and inform the worker as promptly as possible, in particular if the complaint is related to something urgent that may cause harm or exposure to the person, such as lack of PPE needed to prevent COVID-19 transmission. For non-urgent complaints, the [responsible parties at the implementing agency – this may be site level, local, regional] will aim to resolve complaints within 2 weeks. For complaints that were satisfactorily resolved by the [responsible parties at the implementing agency – this may be site

level, local, regional], the incident and resultant resolution will be logged by [responsible parties at the implementing agency – this may be site level, local, regional] and reported monthly to [national level responsible parties at the implementing agency] as part of regular reporting. Where the complaint has not been resolved, the [responsible parties at the implementing agency – this may be site level, local, regional] will refer to [national level responsible parties at the implementing agency] for further action or resolution.

The workers will preserve all rights to refer matters to relevant judicial proceedings as provided under national labor law.

At [national level responsible parties at the implementing agency] level, each grievance record should be allocated a unique number reflecting year, sequence and township of received complaint. Complaint records (letter, email, record of conversation) should be stored together, electronically or in hard copy. The [the implementing agency] will appoint a Worker GM Focal Person, who will be responsible for undertaking a monthly review of all grievances to analyze and respond to any common issues arising. The Focal Person will also be responsible for oversight, monitoring and reporting on the Worker GM.

### **Serious Grievances**

In case a worker experiences serious mistreatment such as harassment, intimidation, abuse, violence, discrimination or injustice at the workplace, the worker may raise the case, verbally or in writing directly to the contractor or [implementing agency – at different levels]. The contractor will immediately refer the case to [implementing agency]. The [implementing agency] will immediately investigate the case respecting confidentiality and anonymity of the worker.

Upon project effectiveness, the [implementing agency] will designate a Focal Person or Persons for Serious Grievances. These Focal Persons will receive training in investigating serious grievances, relevant laws and regulations, and World Bank standards including the rights of people who file a grievance. [Implementing agency] and the World Bank will jointly develop culturally-sensitive and locally-appropriate roles and responsibilities, and procedures.

In case a direct worker or civil servant has a serious grievance, the staff may directly contact verbally or in writing the Focal Person for Serious Grievances.

All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.

### ***Code of Conduct***

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

- Do not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Do not participate in sexual activity with community members.
- Do not engage in sexual favors or other forms of humiliating, degrading or exploitative behavior.

- Do not engage in any activity that will constitute payment for sex with members of the communities surrounding the workplace.
- Report through the Worker GM suspected or actual gender-based violence against a person of any gender by a fellow worker or any breaches of this Code of Conduct.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass women, children or a vulnerable person through these mediums.
- Comply with all relevant local legislation.
- Engaging in any of the prohibited activities above can be cause for termination of employment, criminal liability, and/or other sanctions.

## Annex 5. Chance Find Procedures

Cultural heritage encompasses tangible and intangible heritage which may be recognized and valued at a local, regional, national or global level. *Tangible cultural heritage*, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in urban or rural settings, and may be above or below land or under the water. *Intangible cultural heritage*, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artefacts and cultural spaces associated therewith— that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

In the event that during construction, sites, resources or artifacts of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents. These procedures take into account requirements related to Chance Finding under national legislation including [list relevant cultural heritage legislation in country].

- Stop the construction activities in the area of chance find temporarily.
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a guard shall be arranged until the responsible local authorities take over. These authorities are [list the responsible authorities under national legislation].
- Notify the relevant [implementing agency field staff] and the relevant [list the responsible local authorities under national legislation] immediately. [Implementing agency field staff] will inform the [implementing agency management].
- The relevant [list the responsible local authorities under national legislation] shall promptly carry out the necessities and inform the [national level cultural heritage or archeology ministry] immediately from the date on which the information is received.
- The [national level cultural heritage or archeology ministry] would be in charge of evaluation /inspection of the significance or importance of the chance finds and advise on appropriate subsequent procedures.
- If the [national level cultural heritage or archeology ministry] determines that chance find is a non-cultural heritage chance find, the construction process can resume.
- If the [national level cultural heritage or archeology ministry] determines chance find is an isolated chance find, [national level cultural heritage or archeology ministry] would provide technical supports/advice on chance find treatment with related expenditure on the treatment provided by the entity report the chance find.