



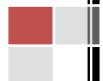
Republic of Sierra Leone
MINISTRY OF FINANCE

**ECONOMIC DIVERSIFICATION PROJECT
(EDP)**

**Environmental and Social
Management Framework
(ESMF)**

Final Report

24th January 2020



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LIST OF ACRONYMS

CoC	Code of Conduct
DSTI	Directorate for Science, Technology and Innovation
EDP	Economic Diversification Project
EPA- SL	Sierra Leone Environmental Protection Agency
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
GBV	Gender Based Violence
GDP	Gross Domestic Product
GoSL	Government of Sierra Leone
GRM	Grievance Redress Mechanism
ITCZ	Inter Tropical Convergence Zone
MLCPE	Ministry of Lands, Country Planning and Environment
MoF	Ministry of Finance
MTCA	Ministry of Tourism and Cultural Affairs
MTI	Ministry of Trade and Industry
NGO	Non- Governmental Organization
NTB	National Tourist Board
ODK	Open Data Kit
PCU	Project Coordinating Unit
PPE	Personal Protective Equipment
RPF	Resettlement Policy Framework
SME	Small and Medium Scale Enterprises
SMEDA	Small and Medium Scale Enterprises Development Agency
STDP	Sustainable Tourist Development Project
WB	World Bank

Executive Summary

Introduction

The project was initially designed as the Sustainable Tourism Development Project (STDP) and an Environmental and Social Management Framework (ESMF) document was subsequently prepared. Given emerging priorities, the GoSL has requested that the World Bank expands the scope of funding to provide additional support to facilitate its economic diversification agenda. This has therefore necessitated updating the ESMF report to cover the expanded scope.

The objective of this Environmental and Social Management Framework (ESMF) is, to provide the basis for assessing, analyzing and evaluating environmental and social impacts of both tourism and SME development related activities under the expanded components of the STDP. Subsequently the ESMF defines appropriate mitigation measures by either avoiding, eliminating, or reducing potential adverse environmental and social impacts. The ESMF further establishes provisions for estimating and budgeting the costs of any alternate measures as part of the implementation of the mitigation guidelines.

The specific project intervention areas are not known at the time of project formulation and the ESMF provides guidance for further screening, and environmental and social assessment as may be determined from the screening results.

The approach to this ESMF entailed the review and update of the earlier ESMF report for the SLTDP, by incorporating the expanded scope as described in the EDP. The key activities therefore comprise the review of earlier project documents and various literature as well as additional stakeholder engagements with various other identified project actors. Other activities include the development of environmental and social checklist forms and preparation of Environmental and Social Management Plans.

Project objective and components

The project objective is to facilitate investments and the growth of SMEs and entrepreneurship in Sierra Leone. At the end of the project, it is envisaged that the following indicators would have been met.

1. Improvement in the overall business enabling environment, as measured by the Ease of Doing Business Score;
2. Private sector investments leveraged through project activities, including investments in early-stage or risk financing for SMEs and start-ups supported by the project, in non-resource sectors;
3. Increase (additional) in average value of gross sales by firms supported by the project;

Accordingly, the project has three components by which it aims to achieve these indicators:

Component 1- Promoting business environment reforms and supporting their implementation:

Component 1.1. Formalization, Entrepreneurship: This aims at digitization and streamlining business registration and licensing procedures and public records

Component 1.2. Access to Finance and Financial Inclusion: This aims at strengthening credit reporting systems and facilitating secured transactions.

Component 1.3. Property Rights and Digital Records: Specific activities include: Digitalization of all existing property deeds and front-end website and Construction permits: Introduce legal reforms and IT systems to support reforms and streamline processes.

Component 2: Supporting the growth of SMEs and entrepreneurship: This component is aimed at supporting the growth and competitiveness of SMEs in non-mining based sectors, particularly in tourism and other service based sectors, to improve productivity by addressing critical firm-level and sector-level constraints.

Component 2.1: Public Goods Intervention: These are public sector interventions that aim to unlock the potential of the private sector and facilitate increased private sector investment. Specifically, this sub component will finance the upgrade of physical infrastructure and build capacity among private and NGO actors:

Sub-Component 2.2. SME and Start Up Acceleration: This sub-component will provide integrated support services to capacity of growth-oriented SMEs and start-ups both in the formal and informal sectors. This activity will be delivered through SME incubation which will largely be delivered by existing incubator programs in the eco-system. The selection of SMEs and Start-ups will be made on the basis of a set of selection criteria which will consider environmental sustainability and social responsibility.

Sub-Component 2.3. Early Stage Financing: This subcomponent is targeted at improving access to finance for both growth-oriented SME and Start-ups for them to make investment necessary productivity-enhancing investments.

Component 3: Strengthening Public Policy and Project Supervision: This sub-component aims at strengthening Public Sector capacity in the design and implementation of policies that are relevant to economic diversification. Some activities include strengthening public policy capacity, monitoring and evaluation and project coordination.

National Policy, Regulatory and Institutional Framework

The relevant key Sierra Leonean policies as well as environmental and other statutory laws and regulations to guide the EDP from conceptualization of the proposed project to implementation and monitoring as well as decommissioning include the following:

- National Tourism Policy
- National Trade Policy
- The Land Policy, 2005;
- Environmental Protection Agency Act, 2008 and the EPA (Amendment) Act, 2010;
- The Local Government Act, 2004;
- The Constitution of Sierra Leone, 1991;

Some of the relevant institutions include the following. Their mandates and interest in the project are subsequently described in the main report:

- Ministry of Finance;
- Ministry of Trade and Industry;
- Ministry of Tourism and Cultural Affairs
- Ministry of Lands, Country Planning and Environment;
- National Tourist Board
- SME Development Agency
- Directorate of Science, Technology and Innovation
- Environmental Protection Agency
- Non-Governmental Organisations (NGOs).

World Bank Safeguard requirements

This document is prepared in accordance with the Environmental Protection Agency Act, 2008 and the EPA (Amendment) Act, 2010. It is also in line with the World Bank's commitment to sustainable development. Safeguards policies triggered to support the project development objectives include the Environmental Assessment (OP/BP 4.01) Natural Habitats (OP/BP 4.04), Physical Cultural Resources (OP/BP 4.11) and the Involuntary Resettlement (OP/BP 4.12).

Description of some potential impact issues and their significance

The potential environmental and social risks and impacts associated with the specific project component activities are listed below. Their levels of significance are also given as Low, Moderate and Major which are defined in the main document.

Sub-project activities and potential environmental and social impact issues/ concerns

Sub- Project activities/interventions	Potential Impact Issues/ concerns	Impact significance
<ol style="list-style-type: none"> 1. Construction of new office buildings 2. Rehabilitation of old office buildings 3. Acquisition of land, preparation of the land for construction of new buildings 4. Construction and upgrading of facilities at tourist sites (hotels, guest houses and conference facilities/ resource centers) 	ENVIRONMENTAL	
	<u>Biodiversity losses</u> Fauna and flora losses from land clearing activities	Low
	<u>Water resources and pollution</u> ✓ Pollutant discharges into local water bodies both surface and groundwater	Low
	✓ Disposal of treated wastewater	Moderate
	✓ Sediment movement into water bodies from poor land clearing practices	Moderate
	<u>Vegetation losses, soil disturbance and Erosion</u> ✓ Site clearing ✓ Increased soil erosion due to disturbances ✓ Soil salinization, acidification	Moderate Low Low

Sub- Project activities/interventions	Potential Impact Issues/ concerns	Impact significance
<p>5. Construction and upgrading of access roads</p> <p>6. Provision of electricity and water supplies/ facilities</p> <p>7. Construction of jetty (eg. at Kent if selected)</p> <p>8. Provision of solid waste management facilities</p> <p>9. Provision of sanitation facilities (toilets, urinals etc)</p> <p>10. Construction of shops/ stalls</p> <p>11. Construction of information/ security posts/ offices/ car parks</p>	<u>Air quality</u> ✓ Site clearing and excavation works ✓ Transport of construction materials and waste ✓ Exhaust emissions for equipment including heavy duty trucks	Moderate Moderate Low
	<u>Vibration and Noise</u> ✓ Site clearing and excavation works ✓ Concrete works ✓ Cutting of roads ✓ Disturbance to offices/local communities and general public	Low Low Moderate Moderate
	<u>Visual intrusion</u> ✓ Construction sites	Moderate
	<u>Generation and disposal of solid waste</u> ✓ Construction waste	Major
	<u>Public health and safety, and traffic issues</u> ✓ Construction works ✓ Poor management of construction sites ✓ Poor traffic management at work sites	Moderate Moderate Moderate
	SOCIAL	
	<u>Land and compensation issues</u> ✓ Lack of clear understanding of land use and occupancy ✓ Conflicts in land claims ✓ Land acquisition and compensation issues ✓ Discrimination, lack of grievance mechanisms for land owners and users ✓ Temporary and permanent properties affected by project	Moderate Moderate Major Moderate Major
	✓	
	<u>Livelihood issues</u> ✓ Community reluctance to accept improved technologies and approaches to operation and management of tourist sites ✓ Adequate, documented and transparent compensation for affected persons in order to vacate or release land for project ✓ Gaps in skill of PAPs and local community to benefit from employment opportunities created by project ✓ Expansion of tourism is associated with rise of cost of living for local communities.	Moderate Moderate Moderate Moderate

Sub- Project activities/interventions	Potential Impact Issues/ concerns	Impact significance
	<u>Community Security and Safety</u>	
	✓ Land acquisition for new constructions	Major
	✓ Risk of Gender Based Violence (sexual Exploitation and Abuse and sexual harassment due to inflow of workers during construction period.	Moderate
	✓ Expansion of tourism brings risks of expansion of sexual exploitation, transmission of STD including HIV/AIDS, increasing drop of girls from schools, and increase in illicit drugs and criminal activities,	Moderate
	<u>Labour issues</u>	
	✓ Labour and recruitment issues	Moderate
	✓ Child labour	Low
	<u>Occupational health and Safety</u>	
	✓ Unavailability and poor use of personal protective equipment and limited/ no enforcement process	Moderate
	<u>Cultural Heritage</u>	
	✓ Community exposure to foreign cultures and therefore threat to local cultural identity and heritage	Moderate
	✓ Compensation issues	Moderate
	✓ Community pride and support	Moderate
	✓ Community relinquishing/ sharing heritage for greater good	Moderate
	<u>Resource Access and Possible Restriction</u>	
	✓ Rights to question and have individual considerations addressed	Moderate
	✓ Lack of possible alternative options	Moderate
	✓ Lack of established grievance redress options	Moderate

Mitigation Guidelines

These mitigation guidelines are given to address the significant impacts. The responsibilities for implementing these measures are described in the main report.

Generic Environmental and Social measures

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
Water Resources and pollution	<p><u>Construction stage</u></p> <ul style="list-style-type: none"> ✓ Works not to be executed under aggressive weather conditions such as rains or stormy conditions. ✓ No solid waste, fuels, or oils to be discharged into any section of a waterway. ✓ Construction to be done in phases to minimize impacts and exposure of soil. ✓ Excavated materials and silt, which cannot be used will be disposed of at appropriate sites as per the Waste Management Plan prepared by contractor and approved by the relevant authority. ✓ Temporary sediment barriers to be installed on slopes to prevent silt from entering water courses. ✓ Maintenance, fueling and cleaning of vehicles and equipment to take place at off-site workshop with adequate leakage prevention measures <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Waste collection and disposal facilities to be provided for community, tourists and SME Solution Centers to minimize waste and pollution of water
Air quality, Vibration and Noise	<p><u>Construction stage</u></p> <ul style="list-style-type: none"> ✓ The working times and construction schedule will be coordinated rationally for all the various construction and engineering companies which will be on site; ✓ Neighboring offices and communities will be duly informed early of all demolition/constructional activities. ✓ The construction and other engineering firms will be selected for the project based on their ability to adopt acceptable engineering practices and their possession of suitable equipment holdings to ensure low noise and air quality emission; ✓ Loading and transportation of demolition debris shall be done during daytime and will avoid relatively noisy equipment operating during the night; ✓ Stock piles of debris will be covered to prevent re-suspension of dust into the air; ✓ On-site mixing of cement, sand stone and other constructional materials will be done in an enclosed space and these materials shall be stored in an enclosed yard or covered tightly; ✓ Speed limit shall be set for construction and transportation vehicle both within and outside the project site to avoid re-entrainment of dust; and ✓ A water bowser will be available on site for frequent dousing or sprinkling to suppress dust from earthworks. <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Adequate road signs to be planted on dust roads to limit vehicular speeds

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<ul style="list-style-type: none"> ✓ Properly designed and constructed speed ramps on access roads
Visual intrusion	<ul style="list-style-type: none"> ✓ Community to be well informed of upcoming project using appropriate signages and display boards prior to contractor accessing sites; ✓ Construction activities to be done in sections to reduce impacts of change and visual intrusions to the general public. ✓ The construction sites to be hoarded off from public view. ✓ Good housekeeping measures, such as regular cleaning, to be maintained at the construction site. ✓ Ensure an acceptable post-construction site as per provisions in the contract. ✓ Facilities will be properly designed and constructed to blend with the existing environment
Land acquisition, resettlement and compensation issues	<ul style="list-style-type: none"> ✓ Avoid displacement and impact on livelihood to the extent possible through alternative locations, re-routing and feasible technical design options. ✓ Where avoidance is not possible, Consult affected property owners/users/ communities and seek their consent early in the project development process and develop a Resettlement Action Plan to compensate for project impacts. ✓ Allow affected persons to salvage their properties (including crops) before mobilizing to site to start work ✓ Ensure fair and adequate compensation is paid to all affected persons at replacement cost prior to commencement of construction activities as per the provisions of the RPF ✓ Obtain the required developmental permits from the respective authorities before start of work ✓ A formal grievance redress mechanism to be established and implemented
Livelihood Issues	<ul style="list-style-type: none"> ✓ Ensure appropriate compensations are paid to PAPs as defined in the RPF; ✓ Employment and other opportunities to be given to local communities as much as possible. ✓ Frequent on-the job training on hospitality courses for tourism workers to enhance tourist visits and business ✓ Staff at Solution Centers will be trained to become trainers in safeguards for beneficiaries
Generation and disposal of wastes	<p>Apply the principles of Reduce, Recycle, Reuse and Recover for waste management through the following actions:</p> <p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ Excavated earth materials will, as much as possible, be re-used for back filling purposes to reduce waste ✓ Ensure that the required amounts of construction materials are delivered to site to reduce the incidence of excess material ✓ Provide bins on site for temporary storage of garbage such as lubricant containers, drinking water sachets/ bottles and carrier bags/packaging materials. ✓ Ensure judicious use of construction materials such as pipes, laterites, sand, etc. to reduce waste

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<ul style="list-style-type: none"> ✓ All metal scrap waste will be disposed of at sites approved by the relevant authorities or sold to approved third party agents for use by metal dealers. ✓ Contractor to work according to a prepared and agreed Solid Waste Management Plan. ✓ Project management will ensure that as part of the bidding process, contractors clearly indicate a suitable and District Council approved dumpsite for disposal of debris; ✓ Reusable building materials like roofing sheets, windows and doors, and cement blocks may be salvaged and given to the community for use. <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Waste collection bins to be sited at vantage points to serve the general public ✓ Warning signs to be posted at suitable locations against littering with possible sanctions indicated ✓ Proper arrangement with waste collection companies through the Councils to regularly collect and dispose of solid waste
Housekeeping and Sanitation	<ul style="list-style-type: none"> ✓ Covered dust bins will be provided on site for collection of domestic solid waste and shall be disposed of by the contractor at the identified waste dumps. ✓ Construction workers will be provided separate sanitary facilities which will be kept clean at all times by the contractor. Free range urination/ defecation will not be allowed
Community Health and Safety, and Security	<p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ Works on exposed trenches and earth materials will, as much as possible, be completed before new earth dug and trenches are created. ✓ Work areas to be hoarded off adequately to avoid inquisitive trespassers especially children ✓ Warning signs to be posted around work areas to discourage trespassers ✓ Contractors to maintain adequate security at construction sites to avoid pilfering or vandalising of property ✓ Visibility to be ensured in the night time by providing adequate lighting ✓ Construction workers educated on personal and community health issues. Protection eg., condoms provided against sexually transmitted diseases and particularly sexual violence against women and minors in the community ✓ Contractor to provide procedures to identify and report gender based violence perpetuated by workers and mechanisms to deal with perpetrators and survivors ✓ On completion of the works, all temporary installations will be dismantled, all plant and equipment de-mobilized, waste and left over materials and debris removed by the contractor, and the site left clean and tidy ✓ Bulldozer, hydraulic excavator, pumps, generator, vehicles and other equipment and machinery used for the project will be relocated to new or other project sites in the country managed by the contractor. <p><u>Operational phase</u></p>

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<ul style="list-style-type: none"> ✓ Encourage community leadership to form watch committees to improve security ✓ Institute procedures to avoid/ mitigate incidences of sexual violence against women and minors and also procedures to support survivors ✓ Have separate, safe and easily accessible facilities for women and men working on the site. Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside. ✓ Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where VAWG is prohibited. ✓ As appropriate, public spaces around the project grounds should be well-lit. ✓ Work with police force to provide police posts at all major project areas ✓ First aid facilities to be available at all sites with suitable arrangements with local health facilities to deal with emergencies
Traffic management	<ul style="list-style-type: none"> ✓ Contractors to provide traffic management plans to be approved by relevant authorities and client, if deemed necessary ✓ Adequate alternative arrangements to be made to minimize impact on motorist and pedestrians within existing tourist sites ✓ Works to be completed on time to minimize inconvenience to motorists and pedestrians <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Adequate road signs to be planted on access roads to limit vehicular speeds ✓ Construct properly designed speed ramps on access roads
Labour issues	<ul style="list-style-type: none"> ✓ Follow the project Labor Management Procedure in the Annex ✓ Follow and apply the national labour laws to ensure good wages and working conditions ✓ Follow well- laid out recruitment processes to engage experienced artisans for construction works ✓ Child labour will not be allowed ✓ Include specific labour action plans in site specific ESMPs ✓ Provide code of conduct for workers including harassment and GBV.
Occupational health and safety	<p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ All workers should be given proper induction/orientation on safety. ✓ The contractors will have a Health & Safety Policy and procedures to guide the construction activities. ¹ ✓ Regularly service all equipment and machinery to ensure they are in good working condition. ✓ Ensure there are first aid kits on site and a trained person to administer first aid.

¹ Health and Safety Guidelines: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_exte_rnal_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<ul style="list-style-type: none"> ✓ Provide and enforce the use of appropriate personal protective equipment (PPE) such as safety boots, reflective jackets, hard hats, hand gloves, earplugs, nose masks, etc. ✓ Proof of competence for all equipment/machine operators will be required and established through inspection of valid drivers or operator's license or documents. ✓ Comply with all site rules and regulations. ✓ Apply sanctions where safety procedures are not adhered to. ✓ Site meetings should create awareness on OHS. ✓ Construction workers educated on personal and public health issues. Protection eg., condoms provided against sexually transmitted diseases and consequences of abuses (especially sexual) against host community members <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Staff to be given regular training on Hospitality and self- protection against violence particularly for the women/ girls ✓ Offenders will be appropriately sanctioned; ✓ Management may institute incentive packages for workers who identify and report untoward situations
Gender based Violence (Sexual Exploitation and Abuse and Sexual Harassment)	<ul style="list-style-type: none"> ✓ Staff to be given regular training on Hospitality and self- protection against violence particularly for the women/ girls ✓ Due to the sensitive nature of sexual abuse cases and the need to respect the privacy and wishes of survivors, the redress techniques should be considered differently from the general GRM methods. ✓ A GBV specialist will be hired by the PCU to carry out GBV risk assessments to determine the level of attention and the mitigation options and techniques required at each project site through the development of a GBV action plan. GBV action plan will include a service provider mapping, establishment of clear referral pathway for GBV response, GBV sensitization and outreach plans, code of conduct for project workers etc. ✓ Contractor to implement the GBV action plan with the support of the GBV specialist or service provider. ✓ If required, trained outreach staff will be stationed within each project community and will be required to identify and report all cases to the appropriate authorities
Cultural Heritage	<ul style="list-style-type: none"> ✓ Traditional authority responsible for sanctity of local shrines properly identified and consulted ✓ Necessary cultural rites agreed with community and performed prior to access to sites and at pre- determined time periods

Institutional implementation arrangements

The overall responsibility for project implementation lies with the Ministry of Finance. Other state institutions such as the National Tourist Board, SME Development Agency, Directorate of Science, Technology and Innovation and their respective supervising ministries will have primary responsibility as implementing agencies for specific activities directly related to their areas of functional responsibility, and in line with the project development objective. The Project Coordination Unit (PCU) will be established at the Ministry of Finance. The PCU will be responsible for coordinating and supervising the day-to-day implementation of the project.

Institutional arrangement for the implementation of the Framework ESMP

The PCU through its Safeguard Specialist, will be directly responsible for all safeguard activities and will therefore foremost involve the EPA-SL to carry out the preliminary environmental and social screening of proposed projects by using the checklist suggested in **Annex 1**. The network of appointed safeguard focal persons in the collaborating institutions at NTB, SMEDA, DSTI will ensure implementation of safeguard actions. If significant impacts are anticipated then the national Environmental Assessment (EA) procedures must be duly followed.

When there are minimal or no impacts (as determined using the checklist), Safeguard Focal Persons will collaborate with the safeguard focal persons to proceed with the minimum regular reporting requirements which will be discussed and agreed with the PCU.

When there may be doubts concerning project risks and impacts, the PCU should consult the EPA- SL for guidance as provided by the Sierra Leonean EA procedures as well as the World Bank safeguards team to ensure consistency with the provisions of the Bank's policies triggered.

The formal environmental approval and permitting processes will also be guided by the SL EPA environmental procedures. All environmental assessments must be materially consistent with the applicable World Bank safeguards policies which provides guidance on the environmental assessment procedures for WB funded projects. The SL procedures (EPA, 2008) have also established a process to screen and evaluate all developments, undertakings, projects and programs which have the potential to give rise to significant environmental impacts. There is consistency with both provisions.

Those projects requiring EPA clearance will only commence when an environmental license has been procured from the EPA- SL.

The Environmental and Social Management Plan (ESMP) is presented in the table below:

Environmental and Social Management Plan

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
Water Resources and pollution	✓ Works not to be executed under aggressive weather conditions such as rains or stormy conditions.	Construction phase	As part of project costs	Contractor	No work done during aggressive weather
	✓ No solid waste, fuels, or oils to be discharged into any section of a waterway.	Construction phase	Part of project costs	Contractor	Waste not discharged in waterways
	✓ Construction to be done in phases to minimize impacts and exposure of soil.	Construction phase	Part of project costs	Contractor	Construction work executed in phases
	✓ Excavated materials and silt, which cannot be used will be disposed of at appropriate sites as per the Waste Management Plan prepared by contractor and approved by the relevant authority.	Construction phase	Part of project costs	Contractor	Unusable material disposed of at appropriate sites per Waste Management Plan
	✓ Temporary sediment barriers to be installed on slopes to prevent silt from entering water courses.	Construction phase	Part of project costs	Contractor	Constructed temporary barriers at appropriate locations
	✓ Maintenance, fueling and cleaning of vehicles and equipment to take place at off-site workshop with adequate leakage prevention measures	Construction phase	Part of project costs	Contractor	Off-site workshops for maintenance of vehicles
	✓ Waste collection and disposal facilities to be provided for community, tourists and SME Solution Centers to minimize waste and pollution of water	Operational phase	Part of operational costs	Facility operators	Waste collection and disposal facilities provided
Air quality, Vibration and Noise	✓ The working times and construction schedule will be coordinated rationally for all the various construction and engineering companies which will be on site;	Construction phase	Standard operating practice	Contractor	Schedule prepared for construction activities on site
	✓ Neighboring offices and communities will be duly informed early of all demolition/constructional activities.	Construction phase	-	Contractor	Neighbouring offices and communities informed
	✓ The construction and other engineering firms will be selected for the project based on their ability to adopt	Construction phase	-	PCU	Firms selected based on clearly defined criteria

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<p>acceptable engineering practices and their possession of suitable equipment holdings to ensure low noise and air quality emission;</p> <ul style="list-style-type: none"> ✓ Loading and transportation of demolition debris shall be done during daytime and will avoid relatively noisy equipment operating during the night; ✓ Stock piles of debris will be covered to prevent re-suspension of dust into the air; ✓ On-site mixing of cement, sand stone and other constructional materials will be done in an enclosed space and these materials shall be stored in an enclosed yard or covered tightly; ✓ Speed limit shall be set for construction and transportation vehicle both within and outside the project site to avoid re- entrainment of dust; and ✓ A water bowser will be available on site for frequent dousing or sprinkling to suppress dust from earthworks. ✓ Adequate road signs to be planted on dust roads to limit vehicular speeds ✓ Properly designed and constructed speed ramps on access roads 	<p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Operational phase</p> <p>Operational phase</p>	<p>-</p> <p>-</p> <p>-</p> <p>-</p> <p>As part of project costs</p> <p>Operational costs</p> <p>Operational costs</p>	<p>Contractor</p> <p>Contractor</p> <p>contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Facility operators</p> <p>Facility operators</p>	<p>Loading and transportation of debris in day time</p> <p>Covered stock piles of debris</p> <p>Enclosed spaces for cement mixing</p> <p>Project drivers duly informed of applicable speed limits</p> <p>Frequent dousing to suppress dust</p> <p>Road signs on dust roads</p> <p>Speed ramps</p>
Visual intrusion	<ul style="list-style-type: none"> ✓ Community to be well informed of upcoming project using appropriate signages and display boards prior to contractor accessing sites; 	Construction phase	Project costs	Contractor	Signages and display boards

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<ul style="list-style-type: none"> ✓ Construction activities to be done in sections to reduce impacts of change and visual intrusions to the general public. ✓ The construction sites to be hoarded off from public view. ✓ Good housekeeping measures, such as regular cleaning, to be maintained at the construction site. ✓ Ensure an acceptable post-construction site as per provisions in the contract. ✓ Facilities will be properly designed and constructed to blend with the existing environment 	<p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p>	<p>Project costs</p> <p>Project costs</p> <p>Project costs</p> <p>Project costs</p>	<p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Design engineers/contractor</p>	<p>Construction sectioned appropriately</p> <p>Hoarded sites</p> <p>Tidy construction sites</p> <p>Acceptable post- construction site</p> <p>Facilities blending with existing environment</p>
Land acquisition Resettlement and compensation issues	<ul style="list-style-type: none"> ✓ Avoid displacement or resettlement to the extent possible by exploring alternative locations, re-routing and feasible design options. ✓ Where displacement or resettlement is unavoidable, Consult affected property owners/users/ communities and seek their consent early in the project development process. ✓ Develop a resettlement action plan to guide compensation of impacts ✓ Allow affected persons to salvage their properties (including crops) before mobilizing to site to start work ✓ Ensure fair and adequate compensation is paid to all 	<p>Pre- Construction phase</p> <p>Pre- construction phase</p> <p>Pre- construction phase</p> <p>Pre- construction phase</p> <p>Pre- construction phase</p>	<p>-</p> <p>-</p> <p>US\$20,000/site</p> <p>-</p> <p>US\$10,000/</p>	<p>PCU</p> <p>PCU</p> <p>PCU</p> <p>PCU</p> <p>PCU</p>	<p>Minimum displacement/ resettlement</p> <p>Early consultations in accordance with project engagement plan</p> <p>Compensation in accordance with RAP</p> <p>Affected persons' properties salvaged</p> <p>Affected persons received fair</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<p>affected persons prior to commencement of construction activities as per the provisions of the RPF</p> <ul style="list-style-type: none"> ✓ Obtain the required developmental permits from the respective authorities before start of work ✓ A formal grievance redress mechanism to be established and implemented 	<p>phase</p> <p>Pre- construction phase</p> <p>Pre- construction phase</p>	<p>site</p> <p>US\$5,000/ site</p> <p>US\$2,000/ site</p>	<p>PCU</p> <p>PCU</p>	<p>and adequate compensation</p> <p>Permits acquired</p> <p>Grievance redress mechanism in place</p>
Livelihood Issues	<ul style="list-style-type: none"> ✓ Ensure appropriate compensations are paid to PAPs as defined in the RPF; ✓ Employment and other opportunities to be given to local communities as much as possible. ✓ Frequent on-the job training on hospitality courses for tourism workers to enhance tourist visits and business ✓ Staff at Solution Center will be trained to become trainers in safeguards for beneficiaries 	<p>Pre- construction</p> <p>Construction and operational phases</p> <p>Operational phase</p> <p>Operational phase</p>	<p>-</p> <p>-</p> <p>US\$2,000/ site/ year</p> <p>US\$2,000/ year</p>	<p>PCU</p> <p>Contractor/ facility operators</p> <p>Facility operators</p> <p>Facility operator</p>	<p>Compensation paid</p> <p>Local community members in employment</p> <p>Trained workers</p> <p>Trained staff</p>
Generation and disposal of wastes	<p>Apply the principles of Reduce, Recycle, Reuse and Recover for waste management through the following actions:</p> <ul style="list-style-type: none"> ✓ Excavated earth materials will, as much as possible, be re-used for back filling purposes to reduce waste ✓ Ensure that the required amounts of construction materials are delivered to site to reduce the incidence of excess material ✓ Provide bins on site for temporary storage of garbage such as lubricant containers, drinking water sachets/ bottles and carrier bags/packaging materials. 	<p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p>	<p>Project costs</p> <p>Project costs</p> <p>US\$1,000/ site</p>	<p>Contractor</p> <p>Contractor</p> <p>Contractor</p>	<p>Excavated material reused for backfilling</p> <p>Required amount of materials on site</p> <p>Bins on site for garbage</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<ul style="list-style-type: none"> ✓ Ensure judicious use of construction materials such as pipes, laterites, sand, etc. to reduce waste ✓ All metal scrap waste will be disposed of at sites approved by the relevant authorities or sold to approved third party agents for use by metal dealers. ✓ Contractor to work according to a prepared and agreed Solid Waste Management Plan. ✓ Project management will ensure that as part of the bidding process, contractors clearly indicate a suitable and District Council approved dumpsite for disposal of debris; ✓ Reusable building materials like roofing sheets, windows and doors, and cement blocks may be salvaged and given to the community for use. ✓ Waste collection bins to be sited at vantage points to serve the general public ✓ Warning signs to be posted at suitable locations against littering with possible sanctions indicated ✓ E-waste materials that would be reused with minor modification will be transferred to other organization or will be given to electronic waste recyclers who collect materials such as random access memory and reusable laptops. Proper arrangement with waste collection 	<p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Pre- construction phase</p> <p>Construction phase</p> <p>Operational phase</p> <p>Operational phase</p> <p>Operational phase</p> <p>Operational phase</p>	<p>-</p> <p>Project costs</p> <p>-</p> <p>-</p> <p>-</p> <p>US\$1,000/site</p> <p>US\$500/ site</p> <p>US\$2,000/ site</p> <p>n/a</p>	<p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Facility operators</p> <p>Facility operators</p> <p>Facility operators</p> <p>licensed recyclers</p>	<p>Judicious use of materials</p> <p>Metal scraps properly disposed of</p> <p>Contractor sticking to Plan</p> <p>Contractors indicated approved dump sites in bidding document</p> <p>Salvaged materials given to community for use</p> <p>Waste collection bins on site</p> <p>Warning signs in place</p> <p>Contracts with Waste collection companies</p> <p>Records of electronic items re-used or recycled by licensed</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	companies through the Councils to regularly collect and dispose of solid waste				recyclers
Housekeeping and Sanitation	✓ Covered dust bins will be provided on site for collection of domestic solid waste and shall be disposed of by the contractor at the identified waste dumps.	Construction and operational phases	US\$1,000/ site	Contractor/ Facility operators	Covered dust bins provided
	✓ Construction workers will be provided separate sanitary facilities which will be kept clean at all times by the contractor. Free range urination/ defecation will not be allowed	Construction phase	US\$2,000/ site	Contractor	Sanitary facilities for workers
Community Health and Safety, and Security	<u>Construction phase</u>				
	✓ Works on exposed trenches and earth materials will, as much as possible, be completed before new earth dug and trenches are created.	Construction phase	-	Contractor	No overdue exposed trenches
	✓ Work areas to be hoarded off adequately to avoid inquisitive trespassers especially children	Construction phase	Part of project costs	Contractor	Work areas adequately hoarded
	✓ Warning signs to be posted around work areas to discourage trespassers	Construction phase	Part of project costs	Contractor	Warning signs posted
	✓ Contractors to maintain adequate security at construction sites to avoid pilfering or vandalising of property	Construction phase	Part of project costs	Contractor	Security provided
	✓ Visibility to be ensured in the night time by providing adequate lighting	Construction phase	Part of project costs	Contractor	Adequate lighting at night
	✓ Construction workers educated on personal and community health issues. Protection eg., condoms provided against sexually transmitted diseases and particularly sexual violence against women and minors in the community	Construction phase	Part of project costs US\$2,500/ site	Contractor	Workers educated on health issues

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<ul style="list-style-type: none"> ✓ Contractor to provide procedures to identify and report gender based violence perpetuated by workers and mechanisms to deal with perpetrators and survivors as part of a GBV action plan. ✓ On completion of the works, all temporary installations will be dismantled, all plant and equipment de-mobilized, waste and left over materials and debris removed by the contractor, and the site left clean and tidy ✓ Bulldozer, hydraulic excavator, pumps, generator, vehicles and other equipment and machinery used for the project will be relocated to new or other project sites in the country managed by the contractor. ✓ Encourage community leadership to form watch committees to improve security ✓ Institute procedures to avoid/ mitigate incidences of sexual violence against women and minors and also procedures to support survivors ✓ Have separate, safe and easily accessible facilities for women and men working on the site. Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside. ✓ Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where VAWG is prohibited. ✓ As appropriate, public spaces around the project grounds should be well-lit. 	<p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Operational phase</p> <p>Operational phase</p> <p>Operational phase</p> <p>Operational phase</p>	<p>US\$3,000/ site</p> <p>Part of project costs</p> <p>Part of project costs</p> <p>US\$3,000/ site/ year</p> <p>US\$2,000/ site/ year</p> <p>Part of operational costs</p> <p>US\$1,000/ site</p>	<p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Facility operator</p> <p>Facility operator</p> <p>Facility operator</p> <p>Facility operator</p>	<p>Procedures available to identify and report GBV</p> <p>Temporary installations dismantled and removed after construction</p> <p>Equipment relocated after construction</p> <p>Watch committees formed</p> <p>Procedures in place to avoid sexual violence</p> <p>Separate and safe facilities for male and females</p> <p>Visible signs</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<ul style="list-style-type: none"> ✓ Work with police force to provide police posts at all major project areas ✓ First aid facilities to be available at all sites with suitable arrangements with local health facilities to deal with emergencies 	Operational phase Operational phase Operational phase	Operational costs US\$2,000/ site/ year US\$1,000/ site/ year	Facility operator Facility operator Facility operator	Well lit public places Police posts provided First aid facilities provided
Traffic management	<ul style="list-style-type: none"> ✓ Contractors to provide traffic management plans to be approved by relevant authorities and client, if deemed necessary ✓ Adequate alternative arrangements to be made to minimize impact on motorist and pedestrians within existing tourist sites ✓ Works to be completed on time to minimize inconvenience to motorists and pedestrians ✓ Adequate road signs to be planted on access roads to limit vehicular speeds ✓ Construct properly designed speed ramps on access roads 	Construction phase Construction phase Construction phase Operational phase Operational phase	US\$3,500/ site As part of project costs - Operational cost Operational cost	Contractor Contractor Contractor Facility operator Facility operator	Approved traffic management plans Alternative transport arrangements Timely completion of works Road signs with speed limits Speed ramps
Labour issues	<ul style="list-style-type: none"> ✓ Project to supervise implementation of the Labor Management Procedures given in the Annex ✓ Follow and apply the national labour laws to ensure good wages and working conditions ✓ Follow well- laid out recruitment processes to engage experienced artisans for construction works ✓ Child labour will not be allowed 	Construction/ operational phases Construction/ operational phases Construction phase Construction phase	Project costs - - -	Contractor/ facility operators Contractor/ facility operator Contractor Contractor	Implementation arrangements in place Implementation arrangements in place Implementation arrangements in place No children on site

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	✓ Include specific measures in site specific ESMPs	Construction phase	-	Contractor	Specific measures in ESMP
Occupational health and safety	✓ All workers should be given proper induction/orientation on safety.	Construction phase	-	Contractor	Workers given training on safety
	✓ The contractors will have a Health & Safety Policy and procedures to guide the construction activities. ²	Construction phase	-	Contractor	Health and safety policy in place
	✓ Regularly service all equipment and machinery to ensure they are in good working condition.	Construction phase	-	Contractor	Equipment in good working conditions
	✓ Ensure there are first aid kits on site and a trained person to administer first aid.	Construction phase	US\$1,000/ site	Contractor	First aid kits on site
	✓ Provide and enforce the use of appropriate personal protective equipment (PPE) such as safety boots, reflective jackets, hard hats, hand gloves, earplugs, nose masks, etc.	Construction phase	US\$1,000/ site	Contractor	PPEs provided and in use
	✓ Proof of competence for all equipment/machine operators will be required and established through inspection of valid drivers or operator's license or documents.	Construction phase	-	Contractor	Proof of competence for operators
	✓ Comply with all site rules and regulations.	Construction phase	-	Contractor	Compliance with rules
	✓ Apply sanctions where safety procedures are not adhered to.	Construction phase	-	Contractor	Sanctions applied when required
	✓ Site meetings should create awareness on OHS.	Construction phase	-	Contractor	

² Health and Safety guidelines: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_exte_rnal_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<ul style="list-style-type: none"> ✓ Construction workers educated on personal and public health issues. Protection eg., condoms provided against sexually transmitted diseases and consequences of abuses (especially sexual) against host community members ✓ Staff to be given regular training on Hospitality and self-protection against violence particularly for the women/ girls ✓ Offenders will be appropriately sanctioned; ✓ Management may institute incentive packages for workers who identify and report untoward situations 	<p>Construction phase Construction phase</p> <p>Operational phase</p> <p>Operational phase Operational phase</p>	<p>- -</p>	<p>Contractor Contractor</p> <p>Facility operator</p> <p>Facility operator Facility operator</p>	<p>Awareness on OHS Workers educated on health issues</p> <p>Staff trained on hospitality and self- protection Offenders sanctioned Incentive packages for workers</p>
Gender based Violence (Sexual Exploitation and Abuse and Sexual Harassment)	<ul style="list-style-type: none"> ✓ Staff to be given regular training on Hospitality and self-protection against violence particularly for the women/ girls ✓ Due to the sensitive nature of sexual abuse cases and the need to respect the privacy and wishes of survivors, the redress techniques should be considered differently from the general GRM methods. ✓ A GBV specialist may be hired by the PCU to carry out GBV risk assessments to determine the level of attention and the mitigation options and techniques required at each project site through the development of a GBV action plan. GBV action plan will include a service provider mapping, establishment of clear referral pathway for GBV response, GBV sensitization and outreach plans, code of conduct for project workers etc. ✓ The contractor will implement the GBV Action Plan with 	<p>Construction/ operational phases</p> <p>Construction/ operation phases</p> <p>Pre- Construction phases</p> <p>Construction phase</p>	<p>US\$2,000/ site/ year</p> <p>US\$2,500/ site/ year</p> <p>US\$20,000</p> <p>Contractor</p>	<p>Contractor/ facility operator</p> <p>Contractor/ facility operator</p> <p>PCU</p> <p>Contractor/ GBV</p>	<p>Trained staff on hospitality</p> <p>Different redress mechanism established for GBV cases</p> <p>GBV specialist hired</p> <p>Action plan implemented</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<p>support from the GBV specialist or an identified service provider.</p> <p>✓ If required, trained outreach staff will be stationed within each project community and will be required to identify and report all cases to the appropriate authorities</p>	Construction/ operational phases	US\$2,000/ site/ year	<p>specialist</p> <p>Contractor/ facility operator</p>	Trained outreach staff in project communities
Cultural Heritage	<p>✓ Traditional authority responsible for sanctity of local shrines properly identified and consulted</p> <p>✓ Necessary cultural rites agreed with community and performed prior to access to sites and at pre-determined time periods</p>	<p>Pre- construction phase</p> <p>Pre- construction phase</p>	<p>-</p> <p>-</p>	<p>PCU</p> <p>PCU/ community</p>	<p>Traditional authority consulted</p> <p>Cultural rites performed</p>

Electronic means of data collection and transmission

To ease the safeguard reporting and documentation challenges, the project may consider equipping safeguard persons especially those dealing with grievance issues with electronic means of collecting and transmitting information, that is, for example through the use of the Open Data Kit (ODK). This is an extensible, open-source suite of tools designed to build information services which runs on a variety of android phones and tablets. The ODK solves many issues usually associated with paper-based data collection systems by creating a system which can be used by minimally-trained individuals, and it remains robust despite intermittent power and connectivity challenges. The project may consider engaging the Services of an IT database specialist to design and install the software on devices running on the Android operating system (smartphones and tablets). The field officers including GBV outreach staff may electronically send records to ODK Aggregate (at the end of the day or week). This electronic method will enable easier and faster data collection, a seamless transfer and collation of information from project sites to the PCU. Information sharing is instant and usual errors associated with paper reporting are avoided.

This approach has not been tried in Sierra Leone before but the IT incubation hubs could be given the opportunity to spearhead this technology. If successful, this may be most useful in other national and World Bank assignments in the country.

Grievance management and redress mechanism

Court cases are known to be cumbersome and take a long time before settlements are reached and usually one party is still not satisfied. It is therefore proposed to adopt a simple and accessible procedure for affected persons to be able to follow easily, and which will provide aggrieved people with an avenue for amicable settlement without necessarily opening a Court case.

The Project may have potential adverse impacts on people and the environment. However, in general, identifying grievances and ensuring timely resolution is still very necessary. As such the ESMF has developed a grievance management process to serve as a guide during project implementation. The grievance management guide is provided in the table below.

Grievance Mechanism

Steps	Process	Description	Time frame (Maximum)	Other information
1	Identification of grievance	Face to face; phone; letter, e-mail; recorded during public/community interaction; others	1 Day	Email address; hotline number
2	Grievance assessed and logged	Significance assessed and grievance recorded or logged (i.e. in a log book)	4-7 Days	Significance criteria Level 1 –one off event; Level 2 – complaint is widespread or repeated; Level 3- any complaint (one off or repeated) that indicates breach of law or policy or this ESMF/RPF provisions

3	Grievance is acknowledged	Acknowledgement of grievance through appropriate medium	7 Days	
4	Development of response	-Grievance assigned to appropriate party for resolution -Response development with input from management/ relevant stakeholders	4-7 Days 10-14 Days	
5	Response signed off	Redress action approved at appropriate levels	4-7 Days	Senior management staff of MoF should sign off
6	Implementation and communication of response	Redress action implemented and update of progress on resolution communicated to complainant	10-14 Days	
7	Complaints Response	Redress action recorded in grievance log book Confirm with complainant that grievance can be closed or determine what follow up is necessary	4-7 Days	
8	Close grievance	Record final sign off of grievance If grievance cannot be closed, return to step 2 or refer to sector minister or recommend third-party arbitration or resort to court of law	4-7 Days	Final sign off on by MoF

Capacity building and Training and Budget

The current capacity available to implement the ESMF at the Ministry of Finance and other implementing and collaborating agencies is limited. The project will recruit an environmental and social safeguards officers. There is the need to equip these officers with the understanding, skills and access to information, knowledge and training to enable them to perform effectively as safeguard persons.

The capacity building will include training workshops and production of guidance reports and tools. The following training programs will be implemented to build the capacity of institutions and persons responsible for safeguards:

Training modules and proposed participants

No	Training content	Participants
1.	<ul style="list-style-type: none"> World Bank Safeguard policies of OP 4.12 and OP 4.01; EPA- SL Environmental Assessment Regulations ESMF/ RPF Training of grievance committees 	PCU PCU safeguard specialists, Implementing agencies- MTI, MTCA, SMEDA, DSTI etc
2.	<ul style="list-style-type: none"> Screening Checklist, ToR for PCU safeguard persons ToR for GBV specialist/ IT Specialist/ NGO ToR for Implementing agencies Safeguard focal persons 	Implementing agencies safeguard persons, PCU safeguard specialist
3.	<ul style="list-style-type: none"> Preparation of Terms of Reference and 	Implementing agencies safeguard

	MOUs for ESIA and ARAPs/ RAPs	persons, PCU safeguard specialist
4.	<ul style="list-style-type: none"> Environmental and Social Management Plans GBV mitigation plans Grievance redress registration and resolution Safeguard reporting formats IT based digital information collection Code of Conduct for contractors 	Implementing agencies safeguard persons, Contractors, Supervising engineers, Community persons/ GBV Outreach staff

The participants at the training programs will therefore range from the relevant staff of the Ministry of Finance/ PCU to selected community members from site- specific project locations. For many of the community members who will be invited to attend, the purpose will be to create awareness on safeguard issues as well as for an understanding of GBV and grievance reporting and resolution procedures.

As much as possible, these training and awareness creation workshops will be decentralized to project locations and the content of the discussions will then focus on site- specific concerns. As a result, large numbers of participants at specific meetings will be avoided.

Training manuals and safeguards reporting formats will be prepared to assist the safeguard focal points to carry out their functions. Consultants may be hired to produce manuals and checklists as and when required by the project.

The awareness creation, capacity improvement and training workshops as well as some logistic support expenses for key stakeholders involved in the implementation of proposed interventions is estimated at **US\$375,000** over the 5- year project life as given in the table below:

Budget estimates

#	Item	Unit	Unit Cost US\$	No	Total Cost US\$	Source of financing
1	Preparation of specific reports (ESIA, ESMP, GBV Plans, LIMP), Stakeholder meetings and Disclosures	No reports/ site (for 7 sites)	15,000	7	105,000	Project funds
2	Capacity Building	No of training workshops/ year for 5 years	5,000	2	50,000	Project funds
3	Implementation of specific ESMPs including GBV plans	Purchase of equipment eg. PPEs/ year	5,000	5 years	25,000	Project funds
		Cost of meetings/ year	5,000	5 years	25,000	Project funds
		GBV plans at all project sites/ year	20,000	5 years	100,000	Project funds
		IT based data	5,000	5 years	25,000	Project funds

#	Item	Unit	Unit Cost US\$	No	Total Cost US\$	Source of financing
		collection				
4	Mid-term audit of ES performance	No	20,000	1	20,000	Project funds
5	Completion audit of ES performance	No	25,000	1	25,000	Project funds
	Total				375,000	

Monitoring and Evaluation

The monitoring indicators at the ESMF level include reports confirming the dissemination of both ESMF and RPF documents as well as capacity building and training activities. At the sub- project activity level, this will encompass Screening reports, permits obtained and GBV and ESMP reports prepared.

Disclosure

The Ministry of Finance and EPA-SL will make copies of the ESMF available in selected public places as required by law for information and comments. Public notice in the media will serve that purpose as well as disclosure at the World Bank website.

The notification will be done through newspaper advertisements and provide:

- Brief description of the Project;
- List of venues where the ESMF report is on display and available for viewing;
- Duration of the display period; and
- Contact information for comments.

1 INTRODUCTION

Sierra Leone is a low-income country with a population of 7.1 million people in the West Coast of Africa. The country has vast natural endowments in land (75% of which arable); mineral and tourism resources. The service sector is led by banking, retail, transport and tourism and the country experienced an impressive economic growth in post-war era prior to the Ebola epidemic shock. However, a per capita GDP of US\$ 653.1 in 2015 is well below the Sub-Saharan Africa average of USD 1588.5. Post-Ebola, poverty patterns appear broadly unchanged. According to World Bank Sierra Leone Macroeconomic Framework, the slight recovery in economic activities and per capita income is expected to gradually reduce poverty though with important disparities between urban and rural areas.

The Government of Sierra Leone has officially prioritised tourism under pillar 1 of its Agenda for Prosperity. The new National Tourism Policy, states that the goal of tourism in Sierra Leone, is to “generate foreign exchange, encourage even development, promote tourism- based rural enterprises, generate employment, accelerate rural urban integration and foster socio-cultural unity among the various regions of the country, through the promotion of domestic and international tourism.” Tourism can positively impact the poor, through direct employment and indirect linkages with the tourism supply chain. With this in view, it is believed that strong consideration should be given to the development of more labour intensive sectors, such as agriculture, tourism and light manufacturing. This has the likelihood to enable the re-building of the nation’s social fabric, for a sustainably equitable economy, with resilience from the various disasters by which the country has been stricken.

In order to achieve the above vision for the country’s tourism sector, the Sustainable Tourism Development Project (STDP), was formulated, with an integrated approach for improving the performance of tourism in the country. The investigated sites around the peninsula are shown in **Figure 1**. However, the scope of this project has been expanded to encompass the growth and development of small and medium scale enterprises under a new project, the Sierra Leone Economic Diversification Project (SLEDP). The proposed Project Development Objective now includes to facilitate investment, SME growth, and entrepreneurship in non-mining productive sectors in Sierra Leone.

Sierra Leone’s economic growth has been led by the solid minerals sector for years. The agricultural, agro-allied and tourism sectors offer huge potential for job creation. Moreover, the importance of Micro, Small and Medium Enterprises in the growth process is considered to be a key engine of economic growth and development in Sierra Leone. Hence, the development and promotion of this sector holds the key to inclusive growth and plays a critical role in Sierra Leone’s future. With the overall objective of reducing poverty through wealth and job creation and facilitating national economic development, the Micro, Small and Medium Enterprise are perceived as the fuel to propel socioeconomic transformation.

For the required SME growth and development to occur, structures must be put in place to address such issues as the weak business environment; red tapeism, corruption; complex entry regulations; access to finance; inadequate power supply; lack of skilled management manpower; and lack of access to new market opportunities. In an effort to address these bottlenecks, the GoSL approached the World Bank for an additional financing facility of US\$20 million through the Sustainable Tourism Development Project (STDP).

This document, therefore, is being prepared in accordance with the Environmental Protection Agency Act, 2008 and the EPA (Amendment) Act, 2010. It is also in line with the World Bank's commitment to sustainable development. Safeguards policies triggered to support the project development objectives include the Environmental Assessment (OP/BP 4.01), Natural Habitats (OP/BP 4.04) Involuntary Resettlement (OP/BP 4.12) and Physical- cultural resources (OP/ BP 4.11).

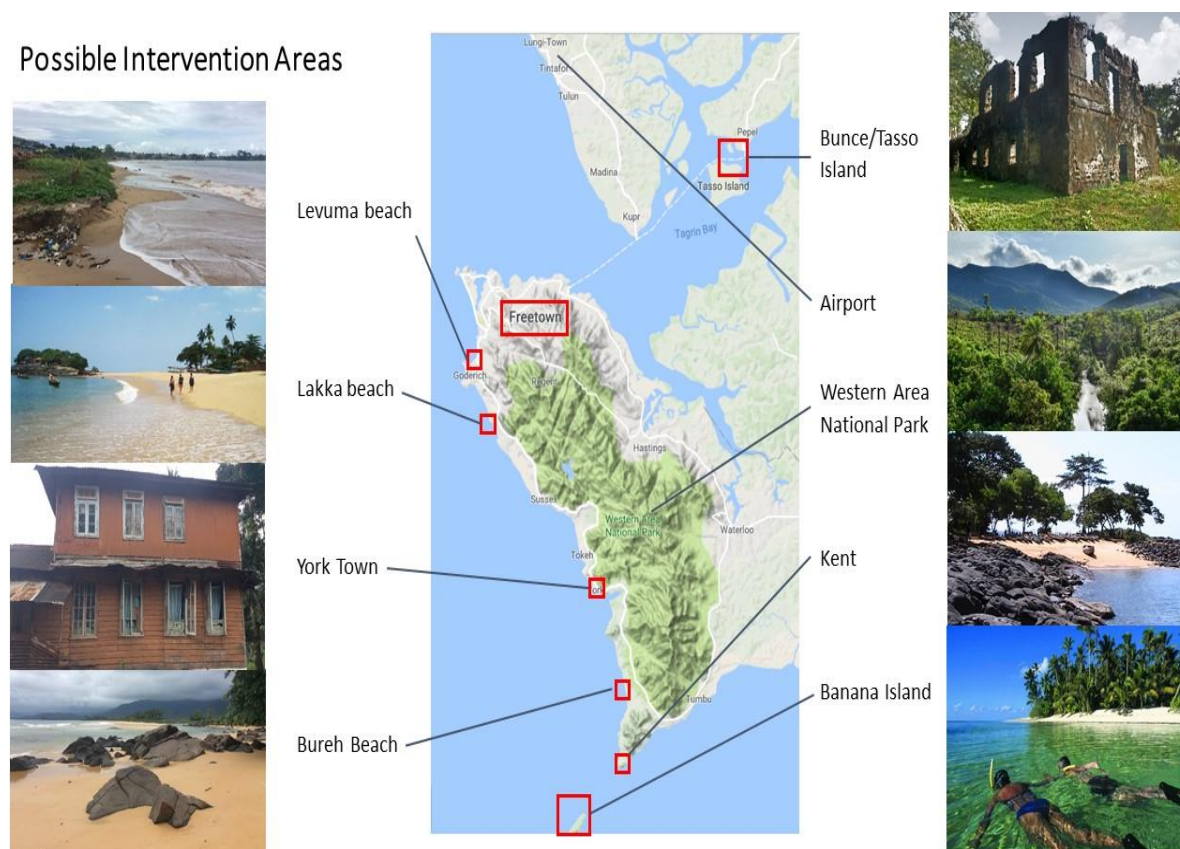


Figure 1: Locations of potential tourist sites to be rehabilitated

1.1 Purpose and Objectives of the ESMF

The project was initially designed as a US\$ 10 million Sustainable Tourism Development Project (STDP) and for which an Environmental and Social Management Framework (ESMF) document was prepared. Given emerging priorities, the GoSL requested that the World Bank expand the scope of

funding to provide an additional US\$20 million to support additional activities to facilitate the economic diversification agenda. This has therefore necessitated updating the ESMF report.

The objective of this Environmental and Social Management Framework (ESMF) is therefore to focus on key activities outlined under the expanded project components within the national context, to provide the basis for assessing, analyzing and evaluating environmental and social impacts of both tourism and SME development related project activities. Subsequently the ESMF will define appropriate mitigation measures by either avoiding, eliminating, or reducing potential adverse environmental and social impacts. The ESMF will further establish provisions for estimating and budgeting the costs of any alternate measures as part of the implementation of the mitigation guidelines.

The specific project intervention areas are not known at the time of project formulation and the ESMF will provide guidance for further screening and Environmental Assessment as may be determined from the screening results.

1.2 Approach to the preparation of the ESMF

Given that both ESMF and RPF safeguard documents were prepared for the main phase of the SLTDP, the approach to this ESMF entails the review and update of the earlier ESMF report by incorporating the expanded scope as described in the EDP. The key activities therefore comprise the review of earlier project documents and various literature as well as additional stakeholder engagements with various other identified project actors.

Literature and documents reviewed

The literature/ documents reviewed include various other environmental and social framework documents prepared for WB funded projects in Sierra Leone including the SLSTDP as well as the following:

- SL EDP Aide Memoire (P164212) May 24;
- TOR_UPDATED_ESMF_AND_RPF_May_17 revised;
- GBV Good Practice Note,
- GBV Referral Directory- Ebonyi State, Nigeria;
- etc

Stakeholder consultation

The ESMF preparation included stakeholder consultations. Under the SLTDP, various key actors within the tourism sector were engaged within the potential project sites as well as the supervising government ministry and agencies to formulate safeguard measures to address identified risks. With the expanded scope which now includes SME development, further consultations have been held with agencies within the sector (eg SME Development Agency, SMEDA) and also potential private sector partners (SENSI Tech Hub) as well as NGOs (Rainbo Initiative).

Meetings were held with key officials and opinion leaders to gauge level of awareness and involvement with the project, concerns of project implementation, and to obtain relevant documents or baseline information of the project area. The consultations also served to gather information on the mandates and permitting requirements to inform the development of the safeguard processes for the Project. Consultees included the following:

- Ministry of Finance (MoF)
- Ministry of Tourism and Cultural Affairs (MTCA),
- Ministry of Trade and Industry (MTI),
- National Tourist Board Sierra Leone (NTBSL),
- Ministry of Lands, Country Planning and the Environment (MLCPE),
- Ministry of Works, Housing and Infrastructure (MWHI),
- SME Development Agency
- Association of Guest Houses, Tourism Federation,
- Association of Small-Scale Enterprises in Tourism (ASSET),
- Hotel Taxi Drivers Association (HTDA),
- Number 2 River Development Association
- Communities Local Authorities
- Private sector entities (SENSI Tech Hub)
- NGOs (Rainbo Initiative)

The full list of stakeholders contacted and issues discussed are presented in **Annex 3**. The outcome of the consultations has emphasized that, the EDP will be beneficial to the national economic growth and development agenda and it is expected that this will positively impact the lives of the people at the community level.

Environmental and social safeguard concerns requiring attention during the implementation of the sub-projects under the EDP have been identified and which may need the preparation of site specific instruments such as ESIA's including GBV action plans. During EDP implementation, the project communities will therefore be sensitized on safeguards issues to address the specific environmental, social, cultural and health and safety challenges including gender based violence.

Development of Environmental and Social Screening Forms

This involved the preparation of checklist for appraisal of the potential sub-projects from the components of the projects. The screening checklist would be used for screening potential impacts of projects on the proposed sites, and also around the environment. The screening forms contains basic checklist for identifying potential impacts.

Preparation of Environmental and Social Management Plans

This step involved the identification of mitigation measures for the potential negative impacts; identification of agencies for implementation of mitigation measures, budget estimates and development of monitoring systems for the implementation of mitigation measures

2 PROJECT OVERVIEW

The project objective is to facilitate investments and the growth of SMEs and entrepreneurship in Sierra Leone. At the end of the project, it is envisaged that the following indicators would have been met.

1. Improvement in the overall business enabling environment, as measured by the Ease of Doing Business Score;
2. Private sector investments leveraged through project activities, including investments in early-stage or risk financing for SMEs and start-ups supported by the project, in non-resource sectors;
3. Increase (additional) in average value of gross sales by firms supported by the project;

Accordingly, the project has three components by which it aims to achieve these indicators:

Component 1- Promoting business environment reforms and supporting their implementation:

The component is aimed at providing technical assistance to key Government Ministries and Agency and Department to streamline processes including digitization, strengthen regulatory environment and build key functional capacity to ensure reforms and new processes are sustained and effectively implemented. Specifically, this component will include the following activities:

Component 1.1. Formalization, Entrepreneurship: This aims at digitization and streamlining business registration and licensing procedures and public records

- I. Map and streamline all business registration and licensing procedures (including Legal, Business process and IT Systems procurement and maintenance, training and capacity building)
- II. Digitizing existing records at CAC, OARG

Component 1.2. Access to Finance and Financial Inclusion: This aims at strengthening credit reporting systems and facilitating secured transactions. Activities include:

- I. Upgrade and expand existing credit reporting to include MFIs, utilities and others
- II. Expand the scope of Borrowers and Lenders Act
- III. IT System Upgrade for public institutions
- IV. Communication and Training for the public sector

Component 1.3. Property Rights and Digital Records: Specific activities include:

- I. Digitalization of all existing property deeds and front-end website
- II. Construction permits: Introduce legal reforms and IT systems to support reforms and streamline processes.

Component 2: Supporting the growth of SMEs and entrepreneurship: This component is aimed at supporting the growth and competitiveness of SMEs in non-mining based sectors, particularly in

tourism and other service based sectors, to improve productivity by addressing critical firm-level and sector-level constraints. These include (i) limited access to finance, (ii) weak capacity of public and private sector institutions (iii) significant last-mile infrastructure gaps (iv) coordination failures amongst GoSL MDAs and (v) weak entrepreneurship ecosystem. Specific support in this regard includes the following:

Component 2.1: Public Goods Intervention: These are public sector interventions that aim to unlock the potential of the private sector and facilitate increased private sector investment. Specifically, this sub component will finance

- **Upgrade Physical Infrastructure** including up to five tourism related sites and the establishment of an SME Solutions Centre or One Stop Shop.
- **Build Capacity Among Private and NGO Actors:** This includes provision of technical assistance to build capacity technical skills related to tourism, waste management, business to business linkages and community engagement. Targeted beneficiaries include SMEs in tourism, Business Incubation Programs, education institutions, NGOs and Civil Society Organizations.
- **Stimulate Entrepreneurship:** through provision of business development services, skills upgrade and training in partnership with local universities and educational institutions
- **Rebrand Tourism:** This activity will be driven by a National Tourism Marketing Strategy, to be developed in the early stages of the project, which will outline key markets, actions and approaches to marketing the destination. Subsequently, this sub-component will finance rebranding and marketing actions to be outlined in the Strategy.

Sub-Component 2.2. SME and Start Up Acceleration: This sub-component will provide integrated support services to capacity of growth-oriented SMEs and start-ups both in the formal and informal sectors. This activity will be delivered through SME incubation which will largely be delivered by existing incubator programs in the eco-system. The selection of SMEs and Start-ups will be made on the basis of a set of selection criteria which will consider environmental sustainability and social responsibility.

Sub-Component 2.3. Early Stage Financing: This subcomponent is targeted at improving access to finance for both growth-oriented SME and Start-ups for them to make investment necessary productivity-enhancing investments. This sub-component also aims at addressing the systemic failures in providing affordable and appropriate financing to SMEs at the start-up and growth stages. It will do so by:

- I. Offering a blend of financing instruments of equity, quasi-equity and debt.
- II. Support to Strengthening Early Stage Risk Financing Ecosystem

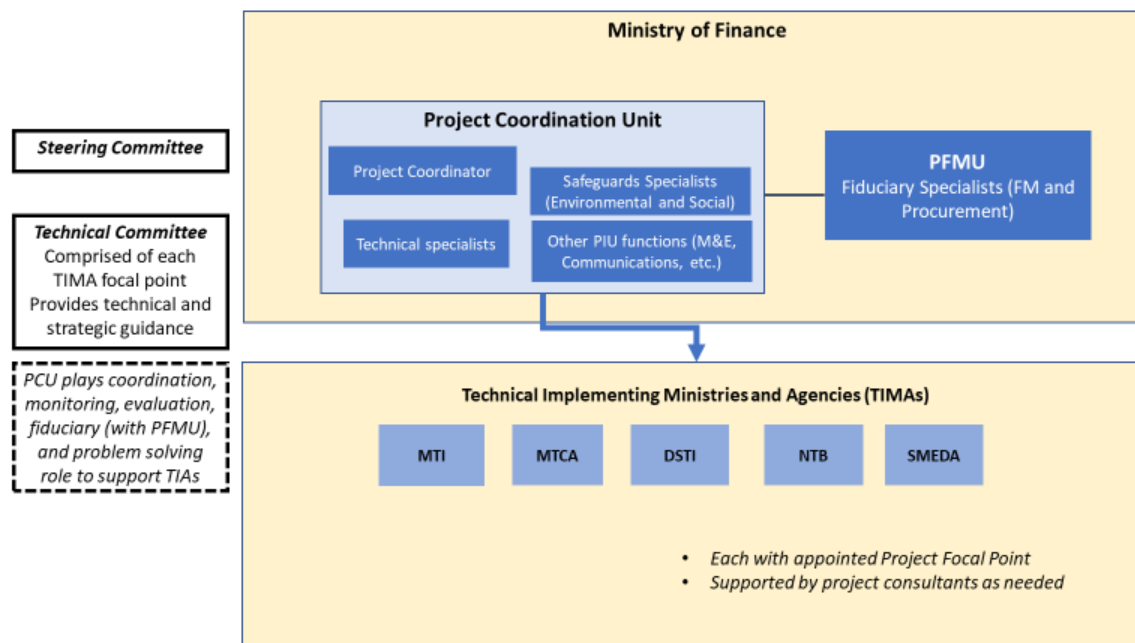
Component 3: Strengthening Public Policy and Project Supervision: This sub-component aims at strengthening Public Sector capacity in the design and implementation of policies that are relevant to economic diversification. It also aims to provide the necessary technical, advisory and financial support for the adequate implementation, management and coordination of the Project; ensure that M&E systems for project and sector-wide analysis systems are upgraded and sustained; and

implement a robust citizen engagement and communications program for project and sector inclusiveness. Specific activities include:

- **Strengthening Public Policy Capacity:** This activity will support key public sector institutions whose functions play a key role in facilitating private sector led growth. The subcomponent will develop a comprehensive approach to building capacities including technical assistance to strengthen selected technical functions, review of critical laws and policies, hold study tours, knowledge exchanges, learning events and on-the-job training for practitioners. Key institutions identified for support include Ministry of Trade and Industry, Ministry of Tourism and Cultural Affairs, National Tourist Board, SME Development Agency, Local Content Agency, the Standards Bureau and the Economic Policy Unit.
- **Monitoring and Evaluation:** building robust M&E tracking systems including improved visitor surveys and statistics and where possible randomized trials to monitor and evaluate the impact of the project on intended beneficiaries.
- **Project Coordination:** This activity will fund the setting up of a Project Coordination Unit to manage the technical components of the project. It will also fund the Project Fiduciary Management Unit to provide fiduciary services to the project.

2.1 Project oversight and implementation arrangement

The overall responsibility for steering the project will lie with the Ministry of Finance (MoF). Other state institutions will include the Ministries of Trade and Industry, and Tourism and Cultural Affairs as well as SME Development Agency, National Tourist Board and Directorate of Science and Technology and Innovation. These institutions will have primary responsibility as implementing ministries/ agencies for specific activities directly related to their areas of functional responsibility, in line with the project development objective, as described in the organogram below.



The Project Coordination Unit (PCU) at the Ministry of Finance will be responsible for coordinating and supervising the day-to-day implementation of the project. The functions of the PCU will include: (i) ensure the overall coordination of the project, make sure implementation of components activities complement each other; (ii) manage project funds on behalf of the executing agencies, keep financial records according to international standards, implement internal management control, and ensure regular external audit (in collaboration with the Audit Authority in the country); (iii) prepare and implement Annual Work Plans and Budgets aggregating demand from beneficiary institutions/agencies, and work plans and budgets proposed by implementing agencies/services providers; (iv) identify potential implementing agencies/goods and service providers, organize their selection/hiring, negotiate and sign contracts with selected implementation partners/goods & service providers, and carry out all procurement work related to the project as per approved procurement plans; (v) prepare quarterly, semi-annual and annual project progress and monitoring and evaluation (M&E) reports.

Currently, there is a lack of capacity within the PCU/ MoF for specialized activities like the implementation of the ESMF and this will be enhanced by engaging the services of social and environmental safeguard consultants to support the SLEDP. Safeguard Focal Persons will be appointed in each of the implementing agencies and will report to the Project Safeguard Person within the PCU.

Under *Component 2*: of the Project which includes infrastructural upgrading, the overall technical leadership will still rest with the PCU/ MoF. However, the various implementing ministries and their agencies (MTI and MTCA with SMEDA and NTB) will be responsible for specific programs/activities within their jurisdiction. Private sector partners such as the Innovation Hubs as well as environmental and social NGOs have also been identified to play crucial roles for the successful implementation of the project.

3 BASELINE CONDITIONS

Sierra Leone is located on the west coast of Africa and covers an area of about 72,000 square kilometres (28,000 square miles). It extends from latitude 7 degrees north to 10 degrees north, and from longitude 10 degrees west to 14 degrees west. The Republic of Guinea borders it on the north and northeast, and the Republic of Liberia borders it on the east and southeast. On the west and southwest, the Atlantic Ocean extends approximately 340 kilometres (211 miles). **Figure 1** gives the location map of Sierra Leone and its provinces.

The current system of government in Sierra Leone, established under the 1991 constitution, is modeled on the following structure of government: the Legislature, the Executive and the Judiciary. Sierra Leone is a Republic with an Executive President and a multi-party system of government with a 124-seat parliament (112 elected members and 12 paramount chiefs). Administratively, Sierra Leone is divided into 4 provinces or administrative regions —the Western Area, and three provinces (Northern, Eastern, and Southern provinces). The Western Area includes the capital, Freetown. Northern Province is divided into five districts, Southern Province into four, and Eastern Province into three. Each district is headed by a district chairman who is elected.

The districts are also subdivided into constituencies and each constituency is represented by a member of parliament. The constituencies are divided into chiefdoms, which are controlled by paramount chiefs. The chiefdoms are further divided into wards represented by local government councilors. At the lowest level i.e. the community level, there are sections and villages. There are 149 chiefdoms and 394 wards in Sierra Leone. The chiefs are hereditary rulers who are elected for life. The representatives and councilors are all elected.

At the local level, there are 12 district councils and 5 town councils outside the Western Area. The five town councils are Bo, Kenema, Makeni, Bonthe and Koidu each headed by a Mayor. These are large urban settlements in the provinces. The Western Area has a rural area council and a city council for Freetown, the nation's capital. The Freetown City Council is headed by the Mayor of Freetown and has 49 councilors. There are 49 ward committees in the Freetown City Council and each headed by a councilor. There are in addition to the councilors 10 selected residents.

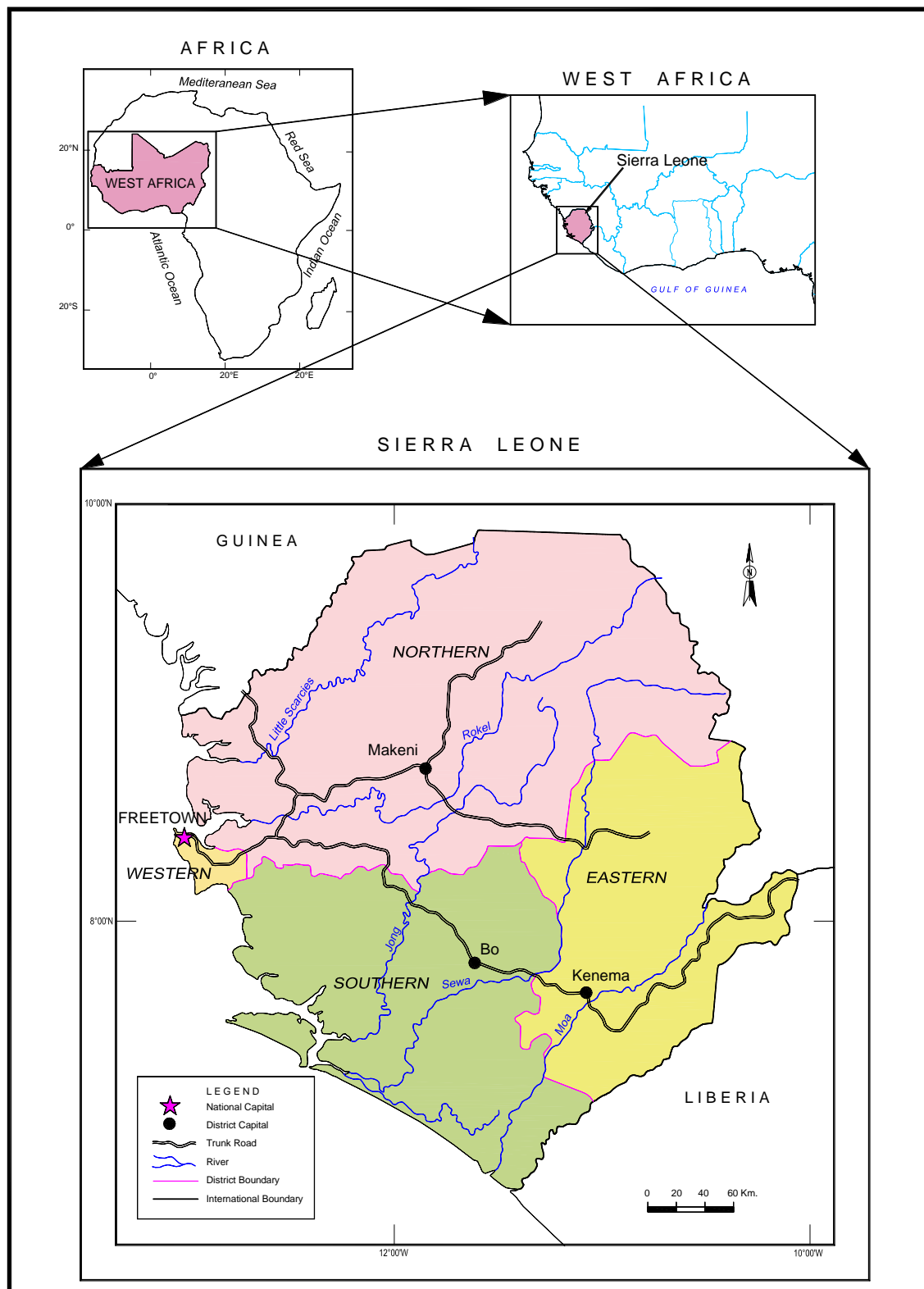


Figure 3:1 Location Map of Sierra Leone and showing the Provinces

3.1 Geography, Topography and Climate

Land resources

Of the total land area of about 71,740km², some 60,650km², are classified as upland and 11,650km² are low lands. Out of the total land area, 53,620km², (5.36m.ha) has been estimated as suitable for crop production. Non-arable land which includes hills, rocky land, roads, rivers and creeks account for the rest of the land resources of the country. Land in Sierra Leone is divided into arable agricultural land (60%), pastoral (18%), mangrove and inland swamps (8%), forest under protection and management (4.5%) and others (9.75%). About 6.57m.ha (90%) of the land is owned privately by families, 360,000ha by communities and families and only 285,000ha (4%) are held by Government in the form of forest reserves. The lands belonging to families are small and fragmented, restricting effective planning and management.

Agro-Ecological Zones

The land resource of Sierra Leone has been classified into five distinct agroecological zones as follows:

- Uplands: moderately well to well-drained soils of varying depth. This covers about 6.1 m.ha or 84% of the land
- Inland Valley Swamps (IVS): fairly flat, poorly drained depressions between adjacent uplands – 675,000 ha (9%)
- Mangrove Swamps: land adjacent to the coast or along estuarine rivers subject to inundation by tidal brackish water, 215, 000 ha (3%)
- Bolilands: low-lying inland depressions subject to flooding during the wet season -120,000 ha (2%)
- Flood plains: located along major rivers, flooded periodically during the wet season – 110,000 ha (2%)

Physiography

The country can simply be divided into three physiographic regions which run approximately north-east to south-west. These are the coastal plains, interior plains and interior plateaux regions. The coastal region is generally low-lying with swampy areas covering an area of 10,444km² and extending some 30 km inland from the coast. The Interior Plains region is approximately 80-100km wide and the topography is an old peneplain continental land mass. This region is the most extensive covering 31, 418 km² with altitude ranging from 40m in the west to 200m in the east. This is the region of depressions and low terraces known as bolilands which are flooded by rain during the wet season due to poor drainage of the clayey soils and water over flowing from rivers and streams. The Interior Plateau region rises rapidly above the interior plains to a height of 300 to 700 and covers an area of 30, 464 km².

Table 1: Regional areas, km²

Region	Area, km ²	Percentage
Coastal Plain	10,444	15
Interior Plain	31,418	43

Interior Plateau	30,464	42
Total	72,326	100

Climate

The climate of Sierra Leone is largely determined by its geographical location on the south-west coast of West Africa, between latitudes 7° and 10° north of the equator. The climate is classified as humid tropical. The climatic pattern is closely related to the general atmospheric circulation of air masses over the tropics, with the south-west monsoon winds dominant from May to October and the north-east trade winds dominant from November to April. The zone of convergence of these two air masses is known as the inter-tropical convergence zone (ITCZ) which oscillates north and south of the equator, imposing seasonality in the distribution of rainfall over the country. This results in two distinctive periods, the biologically active wet season, and the biologically dormant dry season.

The mean annual and seasonal rainfall distribution pattern is as follows:

- The coastal areas receive more than 3,000 mm rain per year with the Western Area recording up to 5000 mm.
- The north-central and south-eastern regions receive between 2500 and 3000 mm.
- The north receives from 2500 to less than 2000 mm.
- Distinctly higher rainfall values above 3000 mm are recorded around Makeni, Mabonto and Bumbuna areas presumably due to the relief influence of the Sula Mountain scarp in the east.

The duration of the wet season varies from nine months, beginning in March in the east, to seven months, starting in May in the north and west, and ending in November.

Temperature and Humidity

The mean annual temperature in the country is 27.0°C. The monthly average maximum is 30.0°C but during February and March, temperatures of up to 35.0°C have been recorded. The average minimum is 22.0°C.

The relative humidity varies considerably with the seasons and during the day. The mean wet season and dry season relative humidities are 90% and 70% respectively. During the day, relative humidity varies from 80% in the morning to 40% in the afternoon. In the dry season values can drop very low.

Evaporation and Water Balance

The annual amount of evapotranspiration in Sierra Leone ranges between 1300 and 1600 mm. During the dry season, the high sunshine hours, high air temperatures and low moisture content help to increase the daily rates of evapotranspiration to 4.5 mm per day. In the wet season, evapotranspiration values average at 3.5 mm per day because of the high humidity values. The water balance calculations therefore indicate that during the wet season, there is “Water Surplus” ranging from about 1200 to 2600 mm and during the dry season the “Water Deficit” ranging from 240 to 610 mm above the assumed soil water storage of 100 mm.

Drainage and Hydrology

The river basins of Sierra Leone are relatively small. Five out of the nine major drainage basins originate in the country, namely Rokel, Pampana or Jong, Sewa, Waanje and the coastal rivers and creeks. The Great and Little Scarcies and the Moa rivers originate in the Fouta Djallon plateau in Guinea while the Mano River originates in Liberia. All the rivers flow an almost linear pattern from north-east to south-west. The respective total length of each river and the basin area within Sierra Leone are shown in the following table:

Table 2: Characteristics of river basins

River Basin	Total Length, km	Catchment area, km ²	Percentage area
Great Scarcies	160	3115	4.3
Little Scarcies	280	13,000	17.9
Rokel/ Seli	380	10,620	14.8
Pampana/ Jong	300	7,511	10.4
Sewa	430	14,140	19.7
Waanje	200	4,510	6.2
Moa	320	9,220	12.7
Mano	180	2,530	3.4
Coastal Streams/ Creeks	120	6,960	9.6
Peninsula and others	-	720	1.0
Total		72,326	100.0

Vegetation

The following main vegetation types are identified in the country.

Closed Forests and Secondary Forests

These are primary and mature secondary forests presently found mainly on hill slopes and crests in the Sewa, Mano and Moa river watersheds and the Peninsula Mountains of the Western Area. The primary forests are mature, dense and moist with mixed stands of evergreen and semi-deciduous trees. Previously, they covered a greater part of the country, but presently account for less than 5% of the vegetation coverage.

Savanna Woodlands

This vegetation is an association of trees and grasses occurring mainly on hill slopes and undulating plains in the drier zones of the country. It comprises of a fairly high density of often gnarled trees and tall grasses. The trees generally have large crowns and can grow up to about 15m tall. The grasses grow up to 3m tall above the lower undergrowth. This vegetation type is predominant within the central and northern parts of the Little and Great Scarcies watershed.

Mangrove Swamp Forests

These are found in estuaries of the major rivers and creeks which line the west coast of the country. These comprise of salt tolerant, stilted shrubs and trees occurring on low mudflats of these estuaries along the edges of the creeks and the rivers and inland as far as the limit of the tidal influence. The forests are usually dense, comprising trees up to 20m tall. However, densities are generally high where tidal influence is most marked, and also where estuaries are protected.

Soils

Soils in Sierra Leone have been grouped into 12 soils associations by the Land and Water Development Division (LWDD) of the Ministry of Agriculture and Food Security. Each of the soil associations has different attributes. Most soils in Sierra Leone are acidic (pH 4-5), and like most tropical soils are ferralitic and excessively leached as a result of the humid tropical conditions. This is particularly true of the upland soils, with such common mineral as Kaolinite, aluminium and iron. Organic matter content is low, making the soils less suitable for cropping. Top soils' organic carbon levels range between less than 1 percent in soils under annually burnt savanna in the north and 2-4 percent in the secondary regrowth and forest in the south, to 3.10 percent in the seasonally flooded swamps which are relatively fertile and suited for rice cultivation. Available plant nutrients are low. The most important soils are the Ultisols, Oxisols, Inceptisols and intergrades. The soils are generally infertile and there is lack of proper management practices. The estimated soil loss due to erosion varies from to 109 tons/ha/year depending on soil type, slope, vegetation and land use.

3.2 Socio- economic baseline

The Sierra Leone economy has always been based on the exploitation of natural resources, notably agricultural, marine and mineral resources. Public sector influence has been dominant in the economic activity in the country. The economy is dominated by agriculture which has remained traditional and subsistence in character, incapable of satisfying the food needs of the country by a wide margin, and improving the living standards of the broad mass of the population. Over 70% of the country's labour force is employed in agriculture. Since poverty is pervasive in the country, the GoSL is implementing several measures aimed at addressing the factors responsible for the difficulties identified in the economy.

The Government of Sierra Leone (GoSL) developed a post-Ebola emergency economic recovery programme that includes supporting key sectors, such as Agriculture, that are considered to be key drivers of economic growth and employment generation. Part of the strategy included the Rapid Ebola Seed Distribution support provided by GoSL and the World Bank through WAAPP. The support included the provision and dissemination of seed of improved varieties, with the aim of making improved planting materials available to communities and rapidly increasing productivity and production. This significantly cushioned the effect on farmers, who lost most of their seeds as a result of reduced farming activities as the Ebola forced them to abandon their communities and farms, and or placed restriction on their movement.

Population

According to the 2015 national Census, the population of Sierra Leone is estimated to be over 7 million, and growing at a rate of about 3.2 percent per year (Weekes et al, 2017). The population density of about 58 persons/km² is relatively high as compared to other countries in Sub-Saharan Africa. The population is concentrated in some particular regions of the country including the Freetown peninsula, the Kono, Kenema and Bo districts. The northern part of the country is sparsely populated. A large section of the population is unemployed, especially among the youth. An estimated 68% live close to the forest or forest regrowth area on which they depend for their livelihood.

National average population density varies among the districts, chiefdoms and towns. Generally, the regions, which have important economic activities tend to harbor larger populations. Areas with 80 persons per km² are the diamond areas or those with large-scale rice cultivation. These include Kono, Kenema and Bo (diamonds and trading) and Freetown (capital and industrial).

Areas with medium density (50-80 persons/ km²) are mainly in the arable alluvial soils and centres for rice, coffee and cocoa production. Areas with low density, i.e. below 30 persons/km² are mainly in the north, the southern coastal areas and the east.

Land Tenure

Land tenure in the Republic of Sierra Leone is characterized by a dual ownership structure. Land in the Western Area, which is the area originally settled by the Creole, the liberated slaves on their arrival in the country, is held under the English system of freehold interests. It is believed that the land was acquired through negotiation with the natives by the English and passed on to the settlers. This area includes the capital city, Freetown. It is also the area that has seen considerable growth and is clearly distinguishable from the rest of the country by the level and quality of development.

Land in the rest of the country is held in communal ownership under customary tenure and is controlled by traditional rulers who administer it on behalf of their communities in accordance with customary principles and usage. The result is a dichotomy between modernization and tradition. While in the Western Area interest in land can be assigned with little difficulty, in the Provinces, the traditional authorities are unwilling to assign interests in land, which would connote any possibility of perpetual alienation such as freehold interests as this will deprive posterity of its ancestral heritage.

System of Land Holding in the Republic of Sierra Leone

The Western Area

Land tenure in the Western area traces its history from the British Colonial administration. The area settled by the freed slaves was declared a Colony of the British Empire, and the settlers, having lived in England, and having experienced the English way of life and system of governance, were more inclined to live their lives like the British. As a result of this and other socio-political considerations, British concepts of tenure were introduced in the colony (Western Area). Since the land on which

the freed slaves were resettled was purchased in the name of the British monarch, the settlers were therefore tenants of the British Crown and the title passed on to them was the tenancy in fee simple or freehold. After independence in 1961 the Government of Sierra Leone replaced the crown as the “landlord” of the Western Area and the freehold system was allowed to persist.

The Provinces

Land is communally held under customary tenure in the provinces though there are minor differences among the various ethnic communities, the general trend is that land is considered a divine heritage which the spirits of the departed ancestors expect to be preserved and handed down to future generations. This is because land is deemed to belong to a large family comprised of the departed ancestors, the living and the unborn generations. It is regarded as a heritage entrusted to the living with a responsibility to ensure its preservation and subsequent assignment to future generations.

Family Interests: The absolute interest in land is vested in families who have responsibility for their portion of the land. The paramount chief is regarded as the custodian of the land on behalf of the entire chiefdom but decisions regarding land are the preserve of heads of families. The administration of the community interest is vested in the head of the land-owning family who is aided by a council of elders. One very important consequence of the fact that absolute interest in land is vested in the family is that it invests every member of the family with an inherent right to the occupation and use of any part of the family land.

The Individual's Interest: Where a family member wishes to cultivate any part of the family land, he has to obtain special permission from the family head that would normally allocate land to him. In some societies the individual has to pay some money, locally referred to as “kola” or “handshake”, to the family head as acknowledgement of the land granted to him. The grant, however does not confer ownership of the land but only confers on him the right to use the land.

State or Public Lands: There are two types of State lands in Sierra Leone; they are Crown Lands and Government Reservations. Crown lands are found in the Western Area while Government Reservations are found in the Provinces.

Crown Lands comprise of lands which have been acquired for the “service of the colony” under the Public Lands Ordinance, 1898.

Gender considerations: Women in Sierra Leone have a close relationship with the land. The majority of women live in rural areas and deliver 60-80% of the agricultural output of the country. However, whilst women constitute the majority of the agricultural workforce, they have never had full access or control of land or property in Sierra Leone. This means that in many parts of the country women can access land only through their husbands or other male family members, and are vulnerable to losing their access to land in cases of divorce or widowhood. According to Women’s Partnership for

Justice and Peace, a local non-profit organization in Sierra Leone: “Women use the land more. But when it comes to ownership, women do not own the land.” (HRDN-SL & GI-ESCR,2014)

Road Infrastructure

The public road network constitutes the most important transport infrastructure in the country, carrying about 80% of internal passenger and cargo traffic. The national road network totals about 11,000 km of which some 8,000 km have been functionally classified in the National Road System (NRS) and the remaining 3000 km as local networks and unclassified roads and tracks. Less than 1000 km of the entire network is now paved with at least half of these reported to be in poor condition. Many formerly paved roads have reverted to gravel due to neglect during the civil war. Of the unpaved portions, less than 30% is in fair to good condition (GoSL Vision 2025, August 2003).

Road construction and rehabilitation is now being given the priority it deserves. The Feeder Roads Department of the Ministry of Works, Housing and Technical Maintenance is undertaking the rehabilitation programme with the support of donors. The Government of Sierra Leone recognises the crucial link between the road network, especially feeder roads and food self- sufficiency. So far, the European Union (EU) and the Islamic Development Bank (IDB) have provided funds for road works in four Districts each.

The road rehabilitation programme does not involve the construction of new roads. It essentially deals with the rehabilitation of existing network through formation, regravelling and reconstruction of old bridges and culverts. A National Road Fund provides funding for the maintenance of the road networks, using light equipment from the Plan Pool. Concerns have been raised about the environmental impact of using laterite on the roads, and this will be addressed in the impact assessment section of this report.

SMEs in Sierra Leone

Sierra Leone’s economic growth has been led by the solid minerals sector for years. The agricultural, agro-allied and tourism sectors offer huge potential for job creation. Moreover, the importance of Micro, Small and Medium Enterprises in the growth process is considered to be a key engine of economic growth and development in Sierra Leone. Hence, the development and promotion of this sector holds the key to inclusive growth and plays a critical role in Sierra Leone’s future. With the overall objective of reducing poverty through wealth and job creation and facilitating national economic development, the Micro, Small and Medium Enterprise are perceived as the oil required to lubricate the engine of socioeconomic transformation, (Fowler, 2017).

In a developing economy like Sierra Leone, Micro, Small, and Medium Enterprises can play a tremendous role in reengineering the socio-economic landscape of the country. These enterprises largely represent a stage in industrial transition from traditional to modern technology. The variation in transitional nature of this process is reflected in the diversity of these enterprises. Most of the small enterprises use simple skills and machinery as well as local raw materials and technology. Micro, Small, and Medium Enterprises are vital in developing the Sierra Leone economy

for the following reasons: social and political role in local employment creation, balanced resources utilization, income generation, utilization of local technology and raw materials and in helping to promote industrial development.

There is growing realization on the part of the Government that instead of the promotion of large-scale enterprises, it should promote micro, small, and medium enterprises. Until recently, the micro, small and medium enterprises were virtually neglected in the Sierra Leone Economic Development Strategy.

As much as 70 percent of households in Sierra Leone rely on micro and small businesses operating within the informal sector, and about 70 percent of those businesses are women-owned. Many SMEs in Sierra Leone are women-owned, and many of the participate in different segments of agribusiness value chains. Women represent a vibrant and capable group in the business sector, but they often have unequal access to productive assets, finance, and other services. Therefore, many women are not realizing the full economic benefits from their engagement in agro-processing and other segments of agribusiness value chains because of discriminatory, customary, and statutory laws, as well as unequal access to resources

Child Labour

Children may be allocated work which ranges from simple tasks with the family, to long hours of harmful and damaging work especially as street hawkers. They would spend long hours selling various items and pushing carts instead of being in school.

Children from poor neighborhoods in the city are most vulnerable to child labour in contravention of the ILO convention 182 which prohibits the use of child labour. Many poor families are unable to afford school fees or bear other cost for their children, resulting in the introduction of their children to petty trading for added income. It is anticipated that with the recent introduction of the Free Education initiative by the government, the practice of child labour will see a decrease.

The project is not expected to impact child labour in the intervention areas. Contractors are prohibited from hiring any person below the age of 18 for any work including as casual workers to carry water or other materials, etc. On completion of the proposed interventions there is the possibility that children may engage in various activities at tourist sites to earn some income to support their families and the NTB will collaborate with project communities to discourage such practices.

Gender Based Violence

Women in post conflict countries like Sierra Leone are particularly vulnerable to gender based violence. It is estimated that over 250,000 women and girls survived abuses during the country's civil war from 1991 to 2002. The patriarchal society in most cases does not favour women with regards to their marriages, property rights and sexual offences. The high levels of illiteracy and poverty among women also tend to compound the challenges. Similarly, economic insecurity contributes to women's vulnerability to GBV, and their marginalization from local and national

decision-making processes further limits their ability to redress these gender inequalities. There is no reliable data base for GBV in Sierra Leone though it is feared to be widespread. The current political leadership has identified rape as a serious threat to women and survivors are entitled to free medical care in government hospitals. Current estimates suggest that, one out of three women in the country has experienced rape and over 70% of these survivors are less than 15 years of age. There are no specific data to describe the situation in the project areas but as per the national situation, the threat is deemed significant especially in the tourist areas which are deemed as hotspots for GBV occurrence.

UNICEF reports that about 1,000 children experience sexual violence each year in Sierra Leone. The national NGO, Rainbo Initiative asserts that GBV incidences in Sierra Leone are notoriously high and estimates that about 10 to 15 cases are currently reported daily country- wide. There is therefore a legitimate concern about the fate of young girls and women within the selected tourist project sites when these sites have been rehabilitated and tourist visits have increased tremendously. The EDP must therefore provide safeguards to specifically avoid/ mitigate any such threats to vulnerable persons within the project communities.

Also, it is expected that the project may require a labor force and associated goods and services that cannot be fully met by local community supply. Where this occurs, a labor force may be brought in from outside of the project area. Foreign workers as well as those from other regions in the country, are one of the drivers that can increase risks of GBV. There is also the risk of girls dropping out of school and cases of early pregnancy and spread of STDs. This will require collaboration with schools, health facilities and communities to reduce the risks.

4 ANALYSIS OF THE NATIONAL ENVIRONMENTAL AND SOCIAL ASSESSMENT FRAMEWORK

This section provides analysis and relevance of key national and sector policies and plans, national legal and institutional frameworks and World Bank safeguards policies to the proposed projects.

4.1 National Policy and Regulatory Framework

National Policies and Action Plans

National Tourism Policy, 2017

The recently validated National Tourism Policy (2017), affirms that the goal of tourism in Sierra Leone is to generate foreign exchange, encourage even development, promote tourism- based rural enterprises, generate employment, accelerate rural urban integration and foster socio-cultural unity among the various regions of the country, through the promotion of domestic and international tourism.

One of the principal objectives of establishing the tourism policy is to guarantee and safeguard the effective standardization of processes and practices within the industry. This standardization fosters uniformity and consensus regarding practices which can result in increased sustainability and an overall improvement in the quality of the tourism product. Furthermore, an appropriate use of environmental and human resources should take place as a result of the implementation of the tourism policy.

The sustainable tourism policy will facilitate government's heightened involvement in the activities of the tourism sector. If policies are implemented, leading to formulation of effective legislation, the result should be an increased effectiveness and efficiency of tourism activities.

The policy is relevant to the project as it offers guidance to stakeholders and reaffirms the commitment of the government to ensuring the sustainable growth of the tourism sector

Relevance of the policy to the project

The National Environmental Policy

The National Environmental Policy (NEP) was approved by cabinet since 1990 and was subsequently revised in 1994 (GOSL, 1994). The NEP aims at achieving sustainable development in Sierra Leone, through sound environmental and natural resources management. The policy objectives are to:

- Secure for all Sierra Leoneans a quality of environment adequate for their health and well-being;
- Conserve and use the environment and natural resources for the benefit of present and future generation; restore, maintain and enhance the ecosystems and ecological processes essential for the functioning of the biosphere; to preserve biological diversity, and uphold the principle of

optimum sustainable yield in the use of living natural resources and ecosystems; [L]
[SEP]

- Raise public awareness and promote understanding of the essential linkages between the environment and development and to encourage individual and community participation in environmental improvement efforts

The NEP also contain among others sector policies on land tenure, land use and soil conservation; forests and wildlife; biological diversity and cultural heritage; mining and mineral resources; coastal and marine resources; settlements, recreational space and greenbelts and public participation. The policy goal for the land tenure, land use and soil conservation is to “use available land in such a way that its quality is conserved so as to enhance its potential for continuous productivity and to prevent degradation”. One of the major strategies which government is now pursuing to achieve the goals of the NEP is “to make as priority Environmental Impact Assessment (EIA) of proposed activities which may significantly affect the environment and the use of a resource.”- (GOSL, 1994).

The NEP also has a specific goal and policy for water resource management which ensures adequate quantity and acceptable water quality to meet domestic, industrial, transportation, agricultural and fisheries by accelerating programmes for the utilization of water for the various uses and expending water quality management, monitoring and assessment programmes. Although laws prohibiting pollution of water bodies exist they are hardly enforced.

The Environmental Policy provides guidance to the project as it ensures an environmental friendly and socially acceptable project.

The National Lands Policy, 2005

As provided in the Constitution, the 2005 National Land Policy also provides for the compulsory acquisition of land in the public interest. The principles of the land policy include among others:

- The principle of land as a common national or communal property resource held in trust for the people and which must be used in the long term interest of the people of Sierra Leone. Such principle only holds where it does not violate existing rights of private ownership.
- Compensation to be paid for lands acquired through compulsory Government acquisition will be fair and adequate and will be determined, among other things, through negotiations that take into consideration government investment in the area.
- Local Authority Assemblies, (District and Town Council), may negotiate for land for development purpose and concessionary prices or as gift, but all such grants should be properly documented and processed.
- No interest in or right over any land belonging to an individual or family can be disposed of without consultation with the owner or occupier of the land.
- No interest in or right over any land belonging to an individual or family can be compulsorily acquired without payment, in reasonable time, of fair and adequate compensation.

The Lands Policy affirms government’s interest in facilitating land acquisition for the project using transparent and fair means so that no persons are aggrieved or made worse off.

The Draft Forestry and Wildlife Sector Policy for Sierra Leone, 2003

This draft policy document is still under review and awaiting parliamentary approval. The goal of the document is to support the development and exploitation of forests and wildlife of Sierra Leone in a sustainable manner for the material, cultural and aesthetic benefit of the people of Sierra Leone.

The main objectives of the forestry policy are to:

- Promote best practices in forest management so as to develop an environmentally friendly, self-sustaining forestry sector that is sensitive and responsive to the economic, social and cultural needs of those who live adjacent to or are dependent on the forest;
- Foster enabling environments for supervised production of sustainable volumes and quality of forest products that will create national wealth and contribute to food security; and
- Encourage the private sector to create employment opportunities for local populations thereby reducing rural poverty

Some of the nation's game reserve may benefit from the project eg. Tacugama Chimpanzee sanctuary. The national policy guarantees government's interest and support for such projects.

The National Action Plan on Gender Based Violence, 2012 - 2016

The Ministry of Social Welfare, Gender and Children's Affairs published the Sierra Leone National Action Plan on Gender Based Violence, a 5-year strategic planning document covering the period 2012 – 2016.

The NAP served as an overarching framework for the prevention, response and prosecution of acts of GBV and served as a guide to service providers and implementing bodies, including government ministries and NGOs, on how to provide coordinated, effective and sustainable protection and services to victims/survivors of GBV.

Women are vulnerable to abuses especially in tourist areas because of the influx of all manner of persons. The Action Plan provides some level of protection and comfort for women living in these areas to go about their daily business freely.

The Sierra Leone National Action Plan 2016 - 2018

The Sierra Leone National Action Plan on UN Resolution 1320 and 1825 aims to protect, empower women and girls vulnerable to sexual violence, preventing sexual violence through the enactment and implementation of laws and above all ensure the active participation and representation of women in leadership positions. The SIL NAP also promotes coordination of the implementation of the document itself.

Legislative framework

The Constitution of Sierra Leone, 1991

The Constitution includes some provisions to protect the right of individuals to private property, and also sets principles under which citizens may be deprived of their property in the public interest as described in Section 21 of the Constitution. It also makes provision for the prompt payment of adequate compensation and access to the court or other impartial and independent authority for

the determination of the land owner's interest or right, and the amount of any compensation to which he is entitled and for the purpose of obtaining prompt payment of that compensation

Environmental Protection Agency Act, 2008 and the EPA (Amendment) Act, 2010

The Environmental Protection Agency Act, 2008 is an Act to establish the Sierra Leone Environmental Protection Agency (SLEPA), to provide for the effective protection of the environment and for other related matters. This Act mandates the EPA to amongst others;

- Advise the Minister on the formulation of policies on all aspects of the environment and in particular make recommendation for the protection of the environment.
- Issue environmental permits and pollution abatement notices for controlling the volume, types, constituents and effects of waste discharges, emissions, deposits or other source of pollutants of substances which are hazardous or potentially dangerous to the quality of the environment or any segment of the environment.
- Prescribe standards and guidelines relating to ambient air, water and soil quality, the pollution of air, water, land and other forms of environmental pollution including the discharge of waste and the control of toxic substances.
- Ensure compliance with any laid down environmental impact assessment procedures in the planning and execution of development projects, including compliance in respect of existing projects.
- Impose and collect environmental protection levies in accordance with this Act or regulations made under this Act.

Sections 24 of the Act list project activities requiring an Environmental Impact Assessment license which includes infrastructural projects such as laying of transmission lines and pipelines. These may probably be considered to include off shore activities though the national authority may be limited to territorial waters only. Further site specific information will be given in the ESIA report to be prepared for this project. Sections 25 and 26 of the Act describe factors for determining whether a project requires an environmental impact assessment and the contents of environmental impact assessment respectively. The Act describes the procedures to be followed to obtain permits for both existing and proposed undertakings through the conduct of environmental impact assessments. The Environmental Protection Agency (Amendment) Act, 2010 sought to give executive powers to the Board.

The Local Government Act, 2004

The Act establishes the local council as the highest political authority in the locality and who shall have legislative and executive powers to be exercised in accordance with this Act. This Act in its First Schedule under section 2 establishes the localities namely: Districts, Towns, and Cities. The part II of this schedule also establishes the number of Paramount Chiefs in each local council. The Third Schedule establishes the functions devolved to the local councils. The Fourth and Fifth Schedules establish departments under each local council, and Valuation list and Rate Books respectively.

The Domestic Violence Act, 2007

The act criminalizes domestic violence, addressing issues of sexual, physical, emotional, psychological and economic violence perpetrated against an individual in a domestic setting. The

issues covered under the act are commonly committed against women and children, which were lawful if reasonable before the enactment of the law.

The Forestry Act, 1988

This Act is identified as pertinent to the Sustainable Tourism Development Project activities because the activities would impact the forest and the Act preserves the forest environment, promoting the practice of forestry in all use of forestland, to ensure sustainability of forest products, and the protection of the soil and water resources that constitute the environment. Removal of a national or community forest by whatever means, without legal permission, is prohibited by the Act.

The Forestry Regulations, 1989

This Act is targeted because the proposed tourism activities may adversely affect portions of the protected forest of the Western Area Peninsula and the regulations state that no protected forest should be tampered with in any way without written permission of authorisation from the Forestry Division to clear land in a classified forest.

The Sierra Leone Maritime Administration Act, 2000

This act is targeted because the activities of the project may adversely impact the marine environment through the development or maintenance of maritime infrastructure such as ports and harbours. (Cognizance is here taken of proposed construction or rehabilitation of jetties).

Institutional framework

The Ministry of Finance

Sierra Leone Ministry of Finance is a ministerial department of the Government of Sierra Leone and is in charge of managing the revenue and finances of the Sierra Leone government. The ministry implements the Sierra Leone government economic policies and public financial management and will be the lead agency in the implementation of this project

Ministry of Trade and Industry

The Ministry has the sole mandate of developing policies and programs to stimulate local and export trade as well as to enhance private sector investment, industrial and economic growth.

Its core functions include:

- Coordinating and spearheading the implementation of the National Trade Policy
- Provide policy guidance and supervision to its agencies/departments for efficient and effective service delivery to the citizens of the Sierra Leone
- Coordinate the development of Trade Support Program that reflects the policy objectives of the Government
- Coordinate the formulation of Annual Implementation Plans for the Trade Support Program, reflecting appropriate sequencing of implementation of Programs and ensuring that Trade Policy remains an integral component of national development plans.
- Liaise with other Ministries, Departments and Agencies of Government to provide an enabling environment for the Private Sector to thrive.

This is the supervising ministry for SMEs and therefore at the forefront of ensuring sound policies to engender their growth and prosperity. Their role in the SLEDP as an implementing ministry will include responsibility for specific project activities such as facilitating the operations of the SMEs and promoting entrepreneurship initiatives.

Ministry of Tourism and Cultural Affairs

The Ministry of Tourism and Cultural Affairs (MTCA) was established in 1972. It is responsible for the sustainable development of tourism and culture in the country. The Ministry has three (3) divisions, namely; Administrative Division, Tourism Division and Cultural Division.

The Administrative Division, apart from its day-to-day administrative functions, has been given technical support to the Tourism Division to execute its divisional mandate, as well as exercising oversight responsibility over the National Tourist Boards (NTB).

The Tourism Division, described as the 'hub' of the Ministry is responsible for the formulation of strategic tourism policies, with oversight responsibility for the national Tourist Board.

The Cultural Division has the responsibility of formulating strategic cultural policies, plans and programs, as well as over-seeing the activities of five (5) implementing agencies whose activities relate to cultural issues; Monuments and Relics Commission, Sierra Leone National Museum, Sierra Leone Railway Museum, The National Dance Troupe, and Bunce Island: The Island.

This ministry is responsible for tourism promotion in the country and has the mandate to guarantee the growth of the sector. The ministry's input is vital to ensure consistency with national aspirations.

For this project, the MCTA is an implementing ministry with responsibility to directly supervise the design and upgrade of tourist sites.

Ministry of Lands, Country Planning and Environment

The Ministry is responsible for addressing land acquisition and transfers, land ownership and use, national development in a planning capacity and to provide advisory services to the public on land matters and is also responsible for physical planning and management of the forestry resources.

The Ministry of Land is empowered to carry out all land management and two important functions it performs are administration of all state and public lands and the acquisition of property and the payment of compensation.

Any land acquisition or related activities will require the assistance of this Ministry.

Directorate of Science, Technology and innovation

The Directorate of Science, Technology and Innovation (DSTI) has as its vision to use science, technology and innovation to support the Government of Sierra Leone to deliver on its national development plan effectively and efficiently; and to help transform Sierra Leone into an innovation and entrepreneurial hub. The Directorate sits in the Office of the President and executes its

functions through the Office of the Chief Minister. The Chief Innovation Officer (CIO) serves as an Advisor to the President and Chief Minister.

The Directorate will provide inputs for the selection and management of the Solution Centre.

National Tourist Board

The National Tourist Board (NTB) is the main implementing agency of the Ministry of Tourism and Cultural Affairs. It was established by the development of the Tourism Act 1990 and became operational in November, 1991. The NTB functions are described primarily as follows:

- Marketing tourism internationally, including participation in fairs and exhibitions,
- Marketing of the tourism potentials to attract foreign investors,
- Conducting research on tourism trends and market segments,
- Issuing of Licenses to Tourist Establishments,
- Promoting collaboration between the public and private sectors, and
- Providing technical and operational advice to boost tourism investment.

The NTA will be at the forefront of the selection of project sites and the design and upgrade of tourist sites.

Small and Medium Scale Enterprises Development Agency (SMEDA)

The Agency was recently established by an Act of Parliament in 2016 and became functional in 2017 as the government agency responsible for coordinating SME activities. Its core mandate is to promote a conducive business environment including an efficient and effective service delivery network in order to empower and develop small and medium scale enterprises for growth, productivity and competitiveness.

The Agency will provide inputs for the identification and selection of SMEs to benefit from the project.

NGOs

There are NGOs in Sierra Leone with interest in environmental and resource management. Some of these provide social support services including for survivors of sexual abuse. Among the NGOs involved in environmental management are Conservation Society of Sierra Leone (CSSL), Environmental Foundation for Africa (EFA), and Royal Society for the Protection of Birds (RSPB). Those providing social support services include Alliance for Women in Development, Action for Humanity, Media Initiative for Women and Girls and Rainbo Initiative.

Conservation Society of Sierra Leone (CSSL): The Conservation Society for Sierra Leone promotes the wise use and management of Sierra Leone's Natural Resources through Education, Advocacy, Research and Site Action including mangroves protection.

Rainbo Initiative- Sierra Leone: The Rainbo Initiative is a national NGO that has been active in Sierra Leone since 2003. Rainbo Initiative among other functions provides free medical and psychosocial services for survivors of gender-based violence in Sierra Leone

4.2 World Bank Safeguards

The World Bank (WB) has published policies/procedures to guide the safe development of projects it is funding. The triggered policies are described in the table below. The WB requirements are not inconsistent with the national requirements and therefore no implementation conflicts are foreseen.

Table 3: Summary of World Bank Safeguard Policies

No	World Bank Safeguard Policy	Summary of core requirements	Remarks
1	OP 4.01 Environmental Assessment	<p>Requires environmental assessment (EA) of projects proposed for Bank financing to help ensure that they are environmentally sound and sustainable, and thus to improve decision making. The EA takes into account the natural environment (air, water, and land); human health and safety; social aspects (involuntary resettlement, indigenous peoples, and physical cultural resources); and trans boundary and global environmental aspects. It categorizes proposed projects into categories A, B, C or FI based on the extent of adverse impacts anticipated from the project.</p> <p>For Category A and B projects, an ESMP is to be prepared to guide the Implementation of mitigation measures for all identified environmental impacts from the proposed warehouse project.</p>	The project may have moderate environmental and social consequences. These impacts can be managed through the implementation of mitigation measures.
2	OP 4.04 Natural Habitats	It assesses whether the project would significantly convert or degrade natural habitats. It requires to avoid significant loss or Degradation (for critical natural habitats) whereas for non-critical natural habitats to avoid, minimize or mitigate loss or degradation.	The project activities may lead to potential degradation of the natural habitat especially the proposed activities in Ecotourism, island and marine – based tourism in the Western Peninsula and surrounding islands.
3	OP 4.11: Physical Cultural Resources	Investigate and inventories cultural resources potentially affected. Include mitigation measures when there are adverse impacts on physical cultural resources or avoid if possible	Some community shrines may be affected but and chance find procedures will be established to address these if encountered

No	World Bank Safeguard Policy	Summary of core requirements	Remarks
			at project implementation.
4	OP 4.12: Involuntary Resettlement	<p>Assist displaced persons in their effort to improve or at least restore their standards of living. Avoid resettlement where feasible or minimize. Displaced persons should share in project profits.</p> <p>The policy aims to avoid involuntary resettlement to the extent feasible, or to minimize and mitigate its adverse social and economic impacts.</p> <p>The policy prescribes compensation and other resettlement measures to achieve its objectives and requires that borrowers prepare adequate resettlement planning instruments prior to Bank appraisal of proposed projects.</p>	<p>Project may require lands for its civil works which may impact on Livelihood and private or community assets. When these are determined the RPF prepared as part of the project will provide guidance for the development of a RAP or ARAP depending on the number of affected people.</p>

5 PROJECT ENVIRONMENTAL AND SOCIAL RISKS, GENERIC POTENTIAL IMPACTS

The environmental and social impacts of the EDP for the most part, are expected to be moderate, site specific, and easily manageable to acceptable levels through the implementation of appropriate mitigation measures. The environmental and social screening process to be followed is described under section 7 of this report.

5.1 Key potential activities and interventions of environmental and social significance

The project activities will involve provision of infrastructural services (civil works support ranging from rehabilitation of yet-to-be identified existing sites, to new and yet to be identified sites) and support to selected SMEs (e.g. financial support in purchasing equipment like computers or sewing machines). The probable project infrastructure to be provided may include the following:

- Construction of new buildings
- Rehabilitation of old buildings
- Construction and upgrading of facilities at tourist sites (hotels, guest houses and conference facilities/ resource centers)
- Construction and upgrading of access roads
- Provision of electricity and water supplies/ facilities
- Construction of jetty (eg. at Kent if selected)
- Provision of solid waste management facilities
- Provision of sanitation facilities (toilets, urinals etc)
- Construction of shops/ stalls
- Construction of information/ security posts/ offices/ car parks
- Etc

5.2 Description of some potential impact issues and Significance

This section provides the potential environmental and social risks and impacts associated with the specific project component activities listed above during both construction and operational phases. The significance of these impacts are also described as Low, Moderate and Major.

- An impact of **Low Significance** is sufficiently small and well within accepted standards, and/or the receptor is of low sensitivity/value and is temporary.
- An impact of **Moderate Significance** is one which is within accepted limits and standards. Moderate impacts may cover a broad range, from a threshold below which the impact is minor, up to a level that might be just short of breaching an established (legal) limit and is of longer duration.
- An impact of **Major Significance** is one where an accepted limit or standard may be exceeded, or large magnitude impacts occur to highly valued/sensitive resources/receptors.

Table 4: Sub- project activities and potential environmental and social impact issues/ concerns

Sub- Project activities/interventions	Potential Impact Issues/ concerns	Source of impacts/cause of the impacts	Impact significance
	ENVIRONMENTAL		
1. Construction of new office buildings	<u>Biodiversity losses</u> Fauna and flora losses from land clearing activities	Land clearing	Low
2. Rehabilitation of old office buildings	<u>Water resources and pollution</u>		
3. Acquisition of land, preparation of the land for construction of new buildings	✓ Pollutant discharges into local water bodies both surface and groundwater ✓ Disposal of treated wastewater ✓ Sediment movement into water bodies from poor land clearing practices	Land clearing Poor housekeeping at project sites Poor waste management practices	Low Moderate Moderate
4. Construction and upgrading of facilities at tourist sites (hotels, guest houses and conference facilities/ resource centers)	<u>Vegetation losses, soil disturbance and Erosion</u> ✓ Site clearing ✓ Increased soil erosion due to disturbances ✓ Soil salinization, acidification	Land clearing	Moderate Low Low
5. Construction and upgrading of access roads	<u>Air quality</u> ✓ Site clearing and excavation works ✓ Transport of construction materials and waste ✓ Exhaust emissions for equipment including heavy duty trucks	Land clearing Transportation of materials	Moderate Moderate Low
6. Provision of electricity and water supplies/ facilities			
7. Construction of jetty (eg. at Kent if selected)	<u>Vibration and Noise</u> ✓ Site clearing and excavation works ✓ Concrete works ✓ Cutting of roads ✓ Disturbance to offices/local communities and general public	Land clearing Construction work	Low Low Moderate Moderate
8. Provision of solid waste management facilities			
9. Provision of sanitation facilities (toilets, urinals etc)	<u>Visual intrusion</u> ✓ Construction sites	Poor housekeeping Construction work	Moderate
10. Construction of shops/ stalls	<u>Generation and disposal of solid waste</u> ✓ Construction waste	Construction work Transport of materials	Major
11. Construction of information/ security posts/ offices/ car parks	<u>Public health and safety, and traffic issues</u> ✓ Construction works ✓ Poor management of construction sites	Construction work Movement of materials	Moderate Moderate
12. Implementation of new ICT systems			

Sub- Project activities/interventions	Potential Impact Issues/ concerns	Source of impacts/cause of the impacts	Impact significance
13. Support to select start-ups and SMEs	✓ Poor traffic management at work sites		Moderate
	SOCIAL		
	<u>Land and compensation issues</u>	Land acquisition and use for project	
	✓ Lack of clear understanding of land use and occupancy		Moderate
	✓ Conflicts in land claims		Moderate
	✓ Land acquisition and compensation issues		Major
	✓ Discrimination, lack of grievance mechanisms for land owners and users		Moderate
	✓ Temporary and permanent properties affected by project		Major
	<u>Livelihood issues</u>	Compensation arrangements	
	✓ Community reluctance to accept improved technologies and approaches to operation and management of tourist sites		Moderate
	✓ Adequate, documented and transparent compensation for affected persons in order to vacate or release land for project		Moderate
	✓ Disruption of work programs from rehabilitation and upgrading works		Moderate
	<u>Community Security and Safety</u>	Land acquisition Construction work	
	✓ Land acquisition for new constructions		Major
	✓ Risk of Gender Based Violence (sexual Exploitation and Abuse and sexual harassment due to inflow of workers during construction period.		Moderate
	✓ Invasion of privacy of host communities and their households from increased tourist attention		Moderate
	<u>Labour issues</u>	Construction work	
	✓ Labour and recruitment issues		Moderate
	✓ Child labour		Low
	<u>Occupational health and Safety</u>	Construction work	
	✓ Unavailability and poor use of personal protective equipment and limited/ no enforcement process		Moderate

Sub- Project activities/interventions	Potential Impact Issues/ concerns	Source of impacts/cause of the impacts	Impact significance
	<u>Cultural Heritage</u> ✓ Community exposure to foreign cultures and therefore threat to local cultural identity and heritage ✓ Compensation issues ✓ Community pride and support ✓ Community relinquishing/ sharing heritage for greater good	Design and implementation of project	Moderate Moderate Moderate Moderate
	<u>Resource Access and Possible Restriction</u> ✓ Rights to question and have individual considerations addressed ✓ Lack of possible alternative options ✓ Lack of established grievance redress options	Design and implementation of project	Moderate Moderate Moderate
	E-waste from new ICT systems ✓ e-Waste includes computers, printers, copiers, ✓ But the project will not support activities that would cause other types of e-waste such as white goods including fridges, washing machines, dryers, dishwashers, home entertainment and stereo systems, some electrical toys, toasters, kettles etc	Disposal of broken or obsolete ICT components and materials	Low

6 GENERIC GUIDELINES FOR MITIGATION AND ENHANCEMENT MEASURES

The project will impact positively on the Sierra Leonean economy and improve the livelihoods of many citizens as described below. However, some adverse impacts are also foreseen during implementation and these must be mitigated to ensure an overall positive project outcome. The potential adverse impacts are also described and some mitigation measures offered.

6.1 Positive impacts of the project

The following positive impacts are anticipated from the implementation of the project:

- The project will facilitate the economic development of the country which will be in support of national agenda of becoming a middle income country by the year 2035.
- The project will promote the empowerment of women and youth by providing training and job opportunities. Women are at the forefront as entrepreneurs for small scale enterprises and will stand to gain from the injection of training and capital to assist them perform better. The youth will flock to the Incubation centers to learn new trade and will be encouraged to register and set up viable businesses.
- The project will improve the living conditions of citizens. It is anticipated that the earning power of project beneficiaries will be greatly enhanced to be able to take better care of their families in respect of catering for their basic needs such as education, health care and household diet.
- The international profile of Sierra Leone will be enhanced through the improvement and marketing of tourist sites. The provision of better infrastructure will support communication and movement of persons and goods and therefore open up many parts of the country for business and other activities.
- It is anticipated that given the opportunities available to the youth in particular from the project, they will be less vulnerable to social vices and the incidences of community agitation and conflicts may be lessened.

6.2 Generic Mitigation Measures

These mitigation guidelines are given to address the significant impacts. The responsibilities for implementing these measures are described later in the report.

Table 5: Environmental and social mitigation measures

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
Water Resources and pollution	<p><u>Construction stage</u></p> <ul style="list-style-type: none"> ✓ Works not to be executed under aggressive weather conditions such as rains or stormy conditions. ✓ No solid waste, fuels, or oils to be discharged into any section of a waterway. ✓ Construction to be done in phases to minimize impacts and exposure of soil. ✓ Excavated materials and silt, which cannot be used will be disposed of at appropriate sites as per the Waste Management Plan prepared by contractor and approved by the relevant authority. ✓ Temporary sediment barriers to be installed on slopes to prevent silt from entering water courses. ✓ Maintenance, fueling and cleaning of vehicles and equipment to take place at off-site workshop with adequate leakage prevention measures <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Waste collection and disposal facilities to be provided for community, tourists and SME Solution Centers to minimize waste and pollution of water
Air quality, Vibration and Noise	<p><u>Construction stage</u></p> <ul style="list-style-type: none"> ✓ The working times and construction schedule will be coordinated rationally for all the various construction and engineering companies which will be on site; ✓ Neighboring offices and communities will be duly informed early of all demolition/constructional activities. ✓ The construction and other engineering firms will be selected for the project based on their ability to adopt acceptable engineering practices and their possession of suitable equipment holdings to ensure low noise and air quality emission; ✓ Loading and transportation of demolition debris shall be done during daytime and will avoid relatively noisy equipment operating during the night; ✓ Stock piles of debris will be covered to prevent re-suspension of dust into the air; ✓ On-site mixing of cement, sand stone and other constructional materials will be done in an enclosed space and these materials shall be stored in an enclosed yard or covered tightly; ✓ Speed limit shall be set for construction and transportation vehicle both within and outside the project site to avoid re-entrainment of dust; and ✓ A water bowser will be available on site for frequent dousing or sprinkling to suppress dust from earthworks. <p><u>Operational stage</u></p> <ul style="list-style-type: none"> ✓ Adequate road signs to be planted on dust roads to limit vehicular speeds

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
Visual intrusion	<ul style="list-style-type: none"> ✓ Properly designed and constructed speed ramps on access roads ✓ Community to be well informed of upcoming project using appropriate signages and display boards prior to contractor accessing sites; ✓ Construction activities to be done in sections to reduce impacts of change and visual intrusions to the general public. ✓ The construction sites to be hoarded off from public view. ✓ Good housekeeping measures, such as regular cleaning, to be maintained at the construction site. ✓ Ensure an acceptable post-construction site as per provisions in the contract. ✓ Facilities will be properly designed and constructed to blend with the existing environment
Land acquisition Resettlement and compensation issues	<ul style="list-style-type: none"> ✓ Avoid displacement or resettlement to the extent possible by exploring alternative locations, re-routing and feasible design options. ✓ Where displacement or resettlement is unavoidable, Consult affected property owners/users/ communities and seek their consent early in the project development process. ✓ Develop a resettlement action plan to guide compensation of impacts ✓ Allow affected persons to salvage their properties (including crops) before mobilizing to site to start work ✓ Ensure fair and adequate compensation is paid to all affected persons prior to commencement of construction activities as per the provisions of the RPF ✓ Obtain the required developmental permits from the respective authorities before start of work ✓ A formal grievance redress mechanism to be established and implemented
Livelihood Issues	<ul style="list-style-type: none"> ✓ Ensure appropriate compensations are paid to PAPs as defined in the RPF; ✓ Employment and other opportunities to be given to local communities as much as possible. ✓ Frequent on-the job training on hospitality courses for tourism workers to enhance tourist visits and business ✓ Staff at Solution Centers will be trained to become trainers in safeguards for beneficiaries
Generation and disposal of wastes	<p>Apply the principles of Reduce, Recycle, Reuse and Recover for waste management through the following actions:</p> <p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ Excavated earth materials will, as much as possible, be re-used for back filling purposes to reduce waste ✓ Ensure that the required amounts of construction materials are delivered to site to reduce the incidence of excess material ✓ Provide bins on site for temporary storage of garbage such as lubricant containers, drinking water sachets/ bottles and carrier bags/packaging materials.

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<ul style="list-style-type: none"> ✓ Ensure judicious use of construction materials such as pipes, laterites, sand, etc. to reduce waste ✓ All metal scrap waste will be disposed of at sites approved by the relevant authorities or sold to approved third party agents for use by metal dealers. ✓ Contractor to work according to a prepared and agreed Solid Waste Management Plan. ✓ Project management will ensure that as part of the bidding process, contractors clearly indicate a suitable and District Council approved dumpsite for disposal of debris; ✓ Reusable building materials like roofing sheets, windows and doors, and cement blocks may be salvaged and given to the community for use. <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Waste collection bins to be sited at vantage points to serve the general public ✓ Warning signs to be posted at suitable locations against littering with possible sanctions indicated ✓ Proper arrangement with waste collection companies through the Councils to regularly collect and dispose of solid waste
Housekeeping and Sanitation	<ul style="list-style-type: none"> ✓ Covered dust bins will be provided on site for collection of domestic solid waste and shall be disposed of by the contractor at the identified waste dumps. ✓ Construction workers will be provided separate sanitary facilities which will be kept clean at all times by the contractor. Free range urination/ defecation will not be allowed
Community Health and Safety, and Security	<p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ Works on exposed trenches and earth materials will, as much as possible, be completed before new earth dug and trenches are created. ✓ Work areas to be hoarded off adequately to avoid inquisitive trespassers especially children ✓ Warning signs to be posted around work areas to discourage trespassers ✓ Contractors to maintain adequate security at construction sites to avoid pilfering or vandalising of property ✓ Visibility to be ensured in the night time by providing adequate lighting ✓ Construction workers educated on personal and community health issues. Protection eg., condoms provided against sexually transmitted diseases and particularly sexual violence against women and minors in the community ✓ Contractor to provide procedures to identify and report gender based violence perpetuated by workers and mechanisms to deal with perpetrators and survivors as part of a GBV action plan. ✓ On completion of the works, all temporary installations will be dismantled, all plant and equipment de-mobilized, waste and left over materials and debris removed by the contractor, and the site left clean and tidy ✓ Bulldozer, hydraulic excavator, pumps, generator, vehicles and other equipment and machinery used for the project will be relocated to new or other project sites in the country managed by the contractor.

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<u>Operational phase</u> <ul style="list-style-type: none"> ✓ Encourage community leadership to form watch committees to improve security ✓ Institute procedures to avoid/ mitigate incidences of sexual violence against women and minors and also procedures to support survivors ✓ Have separate, safe and easily accessible facilities for women and men working on the site. Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside. ✓ Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where VAWG is prohibited. ✓ As appropriate, public spaces around the project grounds should be well-lit. ✓ Work with police force to provide police posts at all major project areas ✓ First aid facilities to be available at all sites with suitable arrangements with local health facilities to deal with emergencies
Traffic management	<ul style="list-style-type: none"> ✓ Contractors to provide traffic management plans to be approved by relevant authorities and client, if deemed necessary ✓ Adequate alternative arrangements to be made to minimize impact on motorist and pedestrians within existing tourist sites ✓ Works to be completed on time to minimize inconvenience to motorists and pedestrians <u>Operational stage</u> <ul style="list-style-type: none"> ✓ Adequate road signs to be planted on access roads to limit vehicular speeds ✓ Construct properly designed speed ramps on access roads
Labour issues	<ul style="list-style-type: none"> ✓ Project to supervise implementation of the Labor Management Procedures given in the Annex ✓ Follow and apply the national labour laws to ensure good wages and working conditions ✓ Follow well- laid out recruitment processes to engage experienced artisans for construction works ✓ Child labour will not be allowed ✓ Include specific measures in site specific ESMPs
Occupational health and safety	<u>Construction phase</u> <ul style="list-style-type: none"> ✓ All workers should be given proper induction/orientation on safety. ✓ The contractors will have a Health & Safety Policy and procedures to guide the construction activities.³ ✓ Regularly service all equipment and machinery to ensure they are in good working condition. ✓ Ensure there are first aid kits on site and a trained person to administer first aid. ✓ Provide and enforce the use of appropriate personal protective equipment (PPE) such as safety boots, reflective jackets, hard

³ Health and Safety Guidelines: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_exte_rnal_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

Environment, Social and Health Impact Issue/ Concern	Proposed Mitigation Action/ Measures
	<p>hats, hand gloves, earplugs, nose masks, etc.</p> <ul style="list-style-type: none"> ✓ Proof of competence for all equipment/machine operators will be required and established through inspection of valid drivers or operator's license or documents. ✓ Comply with all site rules and regulations. ✓ Apply sanctions where safety procedures are not adhered to. ✓ Site meetings should create awareness on OHS. ✓ Construction workers educated on personal and public health issues. Protection eg., condoms provided against sexually transmitted diseases and consequences of abuses (especially sexual) against host community members <p><u>Operational phase</u></p> <ul style="list-style-type: none"> ✓ Staff to be given regular training on Hospitality and self- protection against violence particularly for the women/ girls ✓ Offenders will be appropriately sanctioned; ✓ Management may institute incentive packages for workers who identify and report untoward situations
Gender based Violence (Sexual Exploitation and Abuse and Sexual Harassment)	<ul style="list-style-type: none"> ✓ Staff to be given regular training on Hospitality and self- protection against violence particularly for the women/ girls ✓ Due to the sensitive nature of sexual abuse cases and the need to respect the privacy and wishes of survivors, the redress techniques should be considered differently from the general GRM methods. ✓ A GBV specialist may be hired by the PCU to carry out GBV risk assessments to determine the level of attention and the mitigation options and techniques required at each project site through the development of a GBV action plan. GBV action plan will include a service provider mapping, establishment of clear referral pathway for GBV response, GBV sensitization and outreach plans, code of conduct for project workers etc. ✓ The contractor will implement the GBV Action Plan with support from the GBV specialist or an identified service provider. ✓ If required, trained outreach staff will be stationed within each project community and will be required to identify and report all cases to the appropriate authorities
Cultural Heritage	<ul style="list-style-type: none"> ✓ Traditional authority responsible for sanctity of local shrines properly identified and consulted ✓ Necessary cultural rites agreed with community and performed prior to access to sites and at pre- determined time periods

7 THE POTENTIAL ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

This document provides guidance on ensuring satisfactory design and implementation of all safeguard actions relating to project activities. It describes the procedures to be followed which are consistent with national and World Bank safeguard provisions. Hence the ESMF provides the mechanism to be followed to:

- Screen proposed project interventions, identifying potential environmental and social impacts and management of safeguard policies implications;
- Design implementation arrangements by EDP including institutional roles and responsibilities
- Train and ensure adequate capacity of institutions to carry out their desired functions
- Monitor the ESMF measures implementation;
- Adequately identify and engage with Stakeholder;
- Determine the costs related to the implementation of the ESMF.

7.1 The Environmental and Social Screening

The main purpose of the preliminary screening exercise is to determine whether projects are likely to have significant potential negative environmental and social impacts and therefore to confirm the appropriate level of assessment required in consistency with the requirements of the EPA-SL and the World Bank provisions.

The PCU will on behalf of the implementing agencies (MTI, MTCA, SMEDA, NTB), be directly responsible for all safeguard activities and will therefore foremost carry out the preliminary environmental and social screening of proposed projects by using the checklist suggested in **Annex 1**. The PCU safeguard specialist will be assisted by the appointed safeguard focal persons in the collaborating institutions at MTI, MTCA, SMEDA and NTB. If significant impacts are anticipated then the EPA- SL must be consulted and the national Environmental Assessment (EA) procedures duly followed.

When there are minimal or no impacts (as determined using the checklist), the safeguard focal person at the implementing agency must necessarily consult with the PCU safeguards specialist for confirmation. Once an agreement is reached, the safeguard focal person may proceed with the minimum regular reporting requirements which will be discussed and agreed with the PCU.

When there may be doubts concerning project risks and impacts, the PCU should consult the EPA- SL for guidance as provided by the Sierra Leonean EA procedures as well as the World Bank safeguards team to ensure consistency with the provisions of the policies triggered.

The formal environmental approval and permitting processes will also be guided by the SL EPA environmental procedures. All environmental assessments must be materially consistent with the applicable World Bank safeguards policies which provides guidance on the environmental assessment procedures for WB funded projects. The SL procedures (EPA,

2008) have also established a process to screen and evaluate all developments, undertakings, projects and programmes which have the potential to give rise to significant environmental impacts. There is consistency between both provisions.

Those projects requiring EPA clearance will only commence when an environmental license has been procured from the EPA- SL. The Agency has provided the list of projects for which ESIA is mandatory as shown in the box below:

<p>Environment Protection Agency Act, 2008 FIRST SCHEDULE (Section 24)</p>
<p>Projects requiring Environmental Impact Assessment Licenses</p> <p>A license is required for the projects whose activities involve or include the following:</p> <ul style="list-style-type: none"> (a) substantial changes in renewable resource use (e.g. conversion of land to agricultural production, forestry or to pasture land, rural development, timber production); (b) substantial changes in farming and fisheries practices (e.g. introduction of new crops, large scale mechanisation or use of chemicals in agriculture); (c) exploitation of hydraulic resources (e.g. dams, drainage and irrigation projects, water basin development, water supply); (d) infrastructure (e.g. roads, bridges, airports, harbours, transmission lines, pipelines, railways); (e) industrial activities (e.g. metallurgical plants, wood processing plants, chemical plants, power plants, cement plants, refinery and petro-chemical plants, agro-industries). (f) extractive industries (e.g. mining, quarrying, extraction of sand, gravel, salt, peat, oil and gas); (g) waste management and disposal (e.g. sewerage systems and treatment plants, landfills, treatment plants for household and hazardous waste); (h) housing construction and development schemes; (i) establishment of places of entertainment, motor repair garages and welding shops; (j) importation of second hand vehicles.

The EPA- SL procedures for environmental licensing have been provided in the **Annex 2** and these will be followed to ensure compliance with national regulations and also to be consistent with the requirements of the WB policy on environmental assessment. However, as stated earlier, this is a WB category B project and environmental and social impacts are expected to be moderate, site specific, and easily manageable through the implementation of mitigation measures to an acceptable level.

Environmental Registration of the Project

The safeguard focal person at the implementing agency will be responsible for the registration of the projects with the EPA- SL using the prescribed form from the Agency. All documents will be submitted through the PCU to the EPA- SL to ensure transparency and accuracy. The mitigation measures suggested in this ESMF as well as the checklist used in the screening exercise should assist the Safeguard focal person to complete this Form

accurately.

The EPA- SL will screen the registration forms and determine the next course of action which may include any of the following:

- Objection to the project
- No objection to the project (equivalent to World Bank Category C Project)
- Preliminary Environmental Assessment (PEA) will be required (equivalent to World Bank Category B Project)
- Environmental and Social Impact Assessment (ESIA) required (equivalent to World Bank Category B or A Project).

For projects receiving the 'no objection' from the EPA (WB Category C project) and therefore have only minor environmental and social risks, the PCU may move to implementation in accordance with pre-approved standards or codes of practices or the pre-approved guidelines for environmental and social management.

Conduct of environmental and social assessment studies

For Projects for which the decision is to conduct environmental impact assessment studies, standalone reports will be prepared. The EPA- SL statutorily requires an EIA for projects in sensitive areas as listed in the box below.

Environment Protection Agency Act, 2008 SECOND SCHEDULE (Section 25)
Factors For Determining Whether A Project Requires An Environmental Impact Assessment
(a) the environmental impact on the community; (b) the location of the project; (c) whether the project transforms the locality; (d) whether the project has or is likely to have substantial impact on the ecosystem of the locality; (e) whether the project results in the diminution of the aesthetic, recreational, scientific, historical, cultural or other environmental quality of the locality; (f) whether the project will endanger any species of flora or fauna or the habitat of the flora or fauna; (g) the scale of the project; (h) the extent of the degradation of the quality of the environment (i) whether the project will result in an increase in demand for natural resources in the locality; (j) the cumulative impact of the project together with other activities or projects, on the environment.

The Safeguard person in consultation with the PCU, will prepare the Terms of Reference for the ESIA, and follow procurement rules for the recruitment of consultants for the ESIA. The ToR may be prepared using issues identified during the screening exercise and also the registration of the project with the EPA- SL. Also, the impact mitigation measures provided in this ESMF may provide some basis for the design of the ToR. The outline of the report will include the following:

Outline of the ESIA

- Description of the study area
- Description of the subproject
- Discussion and evaluation of alternatives
- Environment description
- Legal and regulatory
- Identifying potential impacts of proposed sub-projects
- Process of public consultations
- Development of mitigation measures and a monitoring plan, including estimates of costs and responsibility for implementation of surveillance and monitoring

Review and approval of the ESIA for the project; Publication / Dissemination of ESIA

The PCU will review the draft reports from the safeguard persons (as prepared by the consultant) and will submit same to the EPA-SL. The Agency will review the report and also share with relevant stakeholders for their comments. It may require a public hearing if the Agency considers that the activity could have extensive and far- reaching effects on the environment or has deep social implications.

Where the draft ESIA is found acceptable, the implementing agency will be notified through the PCU to finalize the reports to obtain the license. The PCU shall pay processing and permitting fees prior to collection of the license. The fees are determined based on regulations and formula presented by the EPA- SL.

Other Safeguard documents

A Resettlement Policy Framework (RPF) has been prepared to guide potential land acquisition and relocation activities during the implementation of the EDP. Subsequent instruments will comprise the preparation of Action Plans and Procedures including Abbreviated Resettlement Action Plan (ARAP)/ Resettlement Action Plan (RAP) depending on the numbers of affected persons and complexity of the resettlement- related issues. Other relevant documents to be prepared may include procedures for Cultural Resources/ Chance Finds.

7.2 ESMF Disclosure

The World Bank policies require that environmental reports for projects are made available to project affected groups, local NGOs, and the public at large. Public disclosure of EIA documents or environmental reports is also a requirement of the Sierra Leone EIA procedures. However, there is no limitation as to the extent and scope of disclosure. EDP in collaboration with EPA- SL will make available copies of the ESMF in selected public places as required by law for information and comments. Public notice in the media should be served for that purpose.

The notification should be done through a newspaper or radio announcement or both. The notification should provide:

- a brief description of the Project;
- a list of venues where the ESMF report is on display and available for viewing;
- duration of the display period; and
- contact information for comments.

The EPA- SL will select display venues upon consultation with EDP but would be expected that the venues or places will include the project locations or local communities.

7.3 Occupational Health and Safety (OHS) Risks

Occupational Health and Safety (OHS) risks are low to moderate and will depend on the type of subproject works to be implemented. Since the majority of contracted workers are unskilled and untrained local population, however, risk remains that some accidents may occur that may lead to injuries. All contractors will be required to establish and maintain a safe working environment as per the EHS guidance. All contractors will be required under this Environmental and Social Management Plan (ESMP) to ensure workers will use basic safety gears, receive basic safety training and other preventive actions as provided in this document.

7.4 Gender Based Violence Mitigation Strategy

Manifestations of GBV include, but are not limited to:

- Physical violence (such as slapping, kicking, hitting, or the use of weapons);
- Emotional abuse (such as systematic humiliation, controlling behavior, degrading treatment, insults, and threats);
- Sexual violence, which includes any form of non-consensual sexual contact, including rape;
- Early/forced marriage, which is the marriage of an individual against her or his will often occurring before the age of 18, also referred to as child marriage;
- Economic abuse and the denial of resources, services, and opportunities (such as restricting access to financial, health, educational, or other resources with the purpose of controlling or subjugating a person); and,
- Trafficking and abduction for exploitation.
- Intimate partner violence (IPV) violence perpetrated by a former or current partner, includes a range of acts of violence.

The EDP may therefore have potential adverse impacts on some community members and it is important to identify any such incidents early and ensure timely interventions. These issues may be addressed within the framework of the GRM for the project. However, due to the sensitive nature of sexual abuse cases and the need to respect the privacy and wishes of survivors, the redress techniques may be considered differently from the general GRM methods.

GBV Risk Assessment

In view of the multiple project sites which may have varying GBV concerns, it is proposed that at the onset of the project implementation, a GBV specialist is hired by the PCU to carry out GBV risk assessments to determine the level of attention and the mitigation options and techniques required at each project site.

Design of GBV sensitive GRM

The GRM prepared for the project will form the basis for the design and implementation of mechanisms to address GBV issues. The sensitive and confidential nature of GBV will require that trained outreach staff are stationed at project sites and who will identify and report all cases to the appropriate authorities. The reporting and support network developed by the NGO, Rainbo Initiative may be utilized. The NGO has established Centers in regional hospitals which are staffed with professional persons including para- legal workers and attend solely to survivors of sexual abuse cases.

Capacity building and community awareness

If recruited, the formal arrangement with the suitably qualified NGO/ CSO will entail regular reports to be prepared by the NGO for submission to the PCU on monthly basis detailing cases identified and how they have been dealt with.

All contractors at the various sites will be required to submit Codes of Conduct (CoC) meeting minimum standards as would be outlined by the GBV specialist. The PCU will ensure that the requirements of the CoC are clearly understood by those signing. In addition, they will be given adequate training on the behaviour obligations required under the CoC. Community sensitization and awareness creation programmes will be designed and implemented in the various project communities.

The project will ensure provision of adequate budgetary resources to support these activities. Preliminary estimates have been given under section 7.9 of this report which include capacity building on GBV issues for the PCU and the implementing agencies/ communities.

7.5 Labour Influx

Project development may require man power and equipment mobilization which may come with rapid population influx in response to project labour demand, or perceptions of direct or indirect economic opportunities associated with it. Thus, if not properly planned and effectively managed, labour influx can lead to human welfare risks and the associated adverse social and environmental impacts on local communities.

A Labour Management Procedure (LMP) has been designed to avoid or minimize potential impacts associated with labour management issues that may occur during the construction and upgrading of facilities at the tourist sites and the proposed Solution Centers.

Project workers will carry out planning of sub- projects, construction work and operation of the facilities. Given the small-scale investments, no major risks are envisaged. Subprojects

will be implemented by local contractors and most contracted workers will be hired locally. All contractors will be required to have a written contract with their workers. Labor risks concerning labor influx and associated Gender-Based Violence (GBV), and child labor are considered low given the small size of subproject investments and the PCU's adherence to the national labor code which prohibits forced labor. Since civil works to be supported under the project will be very small in scale and prioritized by local communities themselves, the risk of forced labor is expected to be small. Nonetheless, the contractor will be required in the contract to commit against the use of forced labor, and E&S Officers at the PCU staff in charge of contractor supervision will monitor and ensure the absence of forced labor. It is recognized that, GBV risk is generally high in Sierra Leone and the tourism sector is considered one of the 'hot spots' for this risk. Hence mitigation measures have been suggested in the ESMF to curb this menace in sub- project areas.

Sierra Leonean law prohibits anyone under 18 from performing "unhealthy or heavy" and there are special requirements for leave, work hours, and other conditions of employment. Employer will ensure that no construction workers under 18 years are employed.

Contractors will be required to verify and identify the age of all workers. This will require workers to provide official documentation, which could include a birth certificate, national identification card, passport, or medical or school record. If a minor under the minimum labour eligible age is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the minor in a responsible manner, taking into account the best interest of the minor.

The measures to be adopted may:

- Minimize and manage labour as well as labour influx and its associated challenges;
- Ensure the sustainable use of local resources and infrastructure;
- Avoid, minimize or mitigate potential negative economic or social impacts which might result from Project-induced population influx; and
- Optimize opportunities for future economic development presented by the EDP.

The Plan, if required, may be prepared by a Labour specialist at the onset of the project implementation, and will draw on the best safeguard measures/practices, standards and requirements of the World Bank and will also be based on the assessment of the risk levels of the likelihood of labour influx, with the appropriate mitigation measures proposed to address them where and when necessary. The need for site specific labour management plans appears less significant but must be carefully assessed and established in the design of projects for each site. The Labour Management Procedure is attached as an **Annex 3** to this document.

7.6 Vulnerable and disadvantaged groups

Vulnerable groups are those at risk due to the displacement, compensation, and resettlement process. Vulnerable persons need to be ascertained in the preparation of the Resettlement Action Plan (RAP) or Abbreviated Resettlement Plan (ARAP) when project

scope and activities are properly identified and confirmed. Vulnerable people to be considered under the EDP include:

- The elderly, usually from 70 years and above;
- Widows, Women and children;
- Physically challenged persons and Unemployed youth
- Mentally challenged/highly depressed persons;
- Affected Persons who are too ill, bedridden, hospitalized or stricken with HIV/AIDS as well as Ebola victims/ survivors
- Female heads of households; and
- Migrant/settlers without proper land documents.
- Poorest members of the community

Assistance to vulnerable persons may take various forms and may also depend upon vulnerable persons' requests and needs. Assistance to vulnerable people may include but not limited to the following:

- Assistance in financial literacy training especially for women and assistance in compensation payment procedures (e.g. going to the bank with them to cash the compensation cheque);
- Assistance in the post payment period to secure the compensation money and reduce risks of misuse/robbery;
- Assistance in moving: providing vehicle, driver and assistance at the moving stage;
- In kind compensation payment,
- Assistance to migrant/settlers without proper land documents in finding alternative sites for their activities;
- Assistance in building: providing materials, workforce, or building houses; and
- Health care if required at critical periods: moving and transition period.

Table 6: Potential Environmental and Social Management Plan

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
Water Resources and pollution	✓ Works not to be executed under aggressive weather conditions such as rains or stormy conditions.	Construction phase	As part of project costs	Contractor	No work done during aggressive weather
	✓ No solid waste, fuels, or oils to be discharged into any section of a waterway.	Construction phase	Part of project costs	Contractor	Waste not discharged in waterways
	✓ Construction to be done in phases to minimize impacts and exposure of soil.	Construction phase	Part of project costs	Contractor	Construction work executed in phases
	✓ Excavated materials and silt, which cannot be used will be disposed of at appropriate sites as per the Waste Management Plan prepared by contractor and approved by the relevant authority.	Construction phase	Part of project costs	Contractor	Unuseable material disposed of at appropriate sites per Waste Management Plan
	✓ Temporary sediment barriers to be installed on slopes to prevent silt from entering water courses.	Construction phase	Part of project costs	Contractor	Constructed temporary barriers at appropriate locations
	✓ Maintenance, fueling and cleaning of vehicles and equipment to take place at off-site workshop with adequate leakage prevention measures	Construction phase	Part of project costs	Contractor	Off-site workshops for maintenance of vehicles
	✓ Waste collection and disposal facilities to be provided for community, tourists and SME Solution Centers to minimize waste and pollution of water	Operational phase	Part of operational costs	Facility operators	Waste collection and disposal facilities provided
Air quality, Vibration and Noise	✓ The working times and construction schedule will be coordinated rationally for all the various construction and engineering companies which will be on site;	Construction phase	Standard operating practice	Contractor	Schedule prepared for construction activities on site
	✓ Neighboring offices and communities will be duly informed early of all demolition/constructional activities.	Construction phase	-	Contractor	Neighbouring offices and communities informed
	✓ The construction and other engineering firms will be				Firms selected based on clearly

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<p>selected for the project based on their ability to adopt acceptable engineering practices and their possession of suitable equipment holdings to ensure low noise and air quality emission;</p> <p>✓ Loading and transportation of demolition debris shall be done during daytime and will avoid relatively noisy equipment operating during the night;</p> <p>✓ Stock piles of debris will be covered to prevent re-suspension of dust into the air;</p> <p>✓ On-site mixing of cement, sand stone and other constructional materials will be done in an enclosed space and these materials shall be stored in an enclosed yard or covered tightly;</p> <p>✓ Speed limit shall be set for construction and transportation vehicle both within and outside the project site to avoid re- entrainment of dust; and</p> <p>✓ A water bowser will be available on site for frequent dousing or sprinkling to suppress dust from earthworks.</p> <p>✓ Adequate road signs to be planted on dust roads to limit vehicular speeds</p> <p>✓ Properly designed and constructed speed ramps on access roads</p>	<p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Operational phase</p> <p>Operational phase</p>	<p>-</p> <p>-</p> <p>-</p> <p>-</p> <p>-</p> <p>As part of project costs</p> <p>Operational costs</p> <p>Operational costs</p>	<p>PCU</p> <p>Contractor</p> <p>Contractor</p> <p>contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Facility operators</p> <p>Facility operators</p>	<p>defined criteria</p> <p>Loading and transportation of debris in day time</p> <p>Covered stock piles of debris</p> <p>Enclosed spaces for cement mixing</p> <p>Project drivers duly informed of applicable speed limits</p> <p>Frequent dousing to suppress dust</p> <p>Road signs on dust roads</p> <p>Speed ramps</p>
Visual intrusion	<p>✓ Community to be well informed of upcoming project using appropriate signages and display boards prior to</p>	Construction phase	Project costs	Contractor	Signages and display boards

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<ul style="list-style-type: none"> contractor accessing sites; ✓ Construction activities to be done in sections to reduce impacts of change and visual intrusions to the general public. ✓ The construction sites to be hoarded off from public view. ✓ Good housekeeping measures, such as regular cleaning, to be maintained at the construction site. ✓ Ensure an acceptable post-construction site as per provisions in the contract. ✓ Facilities will be properly designed and constructed to blend with the existing environment 	<p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p>	<p>Project costs</p> <p>Project costs</p> <p>Project costs</p> <p>Project costs</p>	<p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Design engineers/contractor</p>	<p>Construction sectioned appropriately</p> <p>Hoarded sites</p> <p>Tidy construction sites</p> <p>Acceptable post-construction site</p> <p>Facilities blending with existing environment</p>
Land acquisition Resettlement and compensation issues	<ul style="list-style-type: none"> ✓ Avoid displacement or resettlement to the extent possible by exploring alternative locations, re-routing and feasible design options. ✓ Where displacement or resettlement is unavoidable, Consult affected property owners/users/ communities and seek their consent early in the project development process. ✓ Develop a resettlement action plan to guide compensation of impacts ✓ Allow affected persons to salvage their properties (including crops) before mobilizing to site to start work 	<p>Pre- Construction phase</p> <p>Pre- construction phase</p> <p>Pre- construction phase</p> <p>Pre- construction phase</p>	<p>-</p> <p>-</p> <p>US\$20,000/site</p> <p>-</p>	<p>PCU</p> <p>PCU</p> <p>PCU</p> <p>PCU</p>	<p>Minimum displacement/resettlement</p> <p>Early consultations in accordance with project engagement plan</p> <p>Compensation in accordance with RAP</p> <p>Affected persons' properties salvaged</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<ul style="list-style-type: none"> ✓ Ensure fair and adequate compensation is paid to all affected persons prior to commencement of construction activities as per the provisions of the RPF ✓ Obtain the required developmental permits from the respective authorities before start of work ✓ A formal grievance redress mechanism to be established and implemented 	Pre- construction phase Pre- construction phase Pre- construction phase	US\$10,000/ site US\$5,000/ site US\$2,000/ site	PCU PCU PCU	Affected persons received fair and adequate compensation Permits acquired Grievance redress mechanism in place
Livelihood Issues	<ul style="list-style-type: none"> ✓ Ensure appropriate compensations are paid to PAPs as defined in the RPF; ✓ Employment and other opportunities to be given to local communities as much as possible. ✓ Frequent on-the job training on hospitality courses for tourism workers to enhance tourist visits and business ✓ Staff at Solution Center will be trained to become trainers in safeguards for beneficiaries 	Pre- construction Construction and operational phases Operational phase Operational phase	- - US\$2,000/ site/ year US\$2,000/ year	PCU Contractor/ facility operators Facility operators Facility operator	Compensation paid Local community members in employment Trained workers Trained staff
Generation and disposal of wastes	<p>Apply the principles of Reduce, Recycle, Reuse and Recover for waste management through the following actions:</p> <ul style="list-style-type: none"> ✓ Excavated earth materials will, as much as possible, be re-used for back filling purposes to reduce waste ✓ Ensure that the required amounts of construction materials are delivered to site to reduce the incidence of excess material ✓ Provide bins on site for temporary storage of garbage such as lubricant containers, drinking water sachets/ 	Construction phase Construction phase Construction phase	Project costs Project costs US\$1,000/ site	Contractor Contractor Contractor	Excavated material reused for backfilling Required amount of materials on site Bins on site for garbage

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<p>bottles and carrier bags/packaging materials.</p> <ul style="list-style-type: none"> ✓ Ensure judicious use of construction materials such as pipes, laterites, sand, etc. to reduce waste ✓ All metal scrap waste will be disposed of at sites approved by the relevant authorities or sold to approved third party agents for use by metal dealers. ✓ Contractor to work according to a prepared and agreed Solid Waste Management Plan. ✓ Project management will ensure that as part of the bidding process, contractors clearly indicate a suitable and District Council approved dumpsite for disposal of debris; ✓ Reusable building materials like roofing sheets, windows and doors, and cement blocks may be salvaged and given to the community for use. ✓ Waste collection bins to be sited at vantage points to serve the general public ✓ Warning signs to be posted at suitable locations against littering with possible sanctions indicated ✓ E-waste materials that would be reused with minor modification will be transferred to other organization or will be given to electronic waste recyclers who collect materials such as random access memory and reusable 	<p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Pre- construction phase</p> <p>Construction phase</p> <p>Operational phase</p> <p>Operational phase</p> <p>Operational phase</p>	<p>-</p> <p>Project costs</p> <p>-</p> <p>-</p> <p>-</p> <p>US\$1,000/site</p> <p>US\$500/ site</p> <p>- NA</p>	<p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Facility operators</p> <p>Facility operators</p> <p>Ministry of Finance and SMEs</p>	<p>Judicious use of materials</p> <p>Metal scraps properly disposed of</p> <p>Contractor sticking to Plan</p> <p>Contractors indicated approved dump sites in bidding document</p> <p>Salvaged materials given to community for use</p> <p>Waste collection bins on site</p> <p>Warning signs in place</p> <p>E-waste materials and items given to other organizations for re-use or recycled by licensed</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	laptops. Proper arrangement with waste collection companies through the Councils to regularly collect and dispose of solid waste	Operational phase	US\$2,000/ site	Facility operators	recyclers Contracts with Waste collection companies
Housekeeping and Sanitation	✓ Covered dust bins will be provided on site for collection of domestic solid waste and shall be disposed of by the contractor at the identified waste dumps.	Construction and operational phases	US\$1,000/ site	Contractor/ Facility operators	Covered dust bins provided
	✓ Construction workers will be provided separate sanitary facilities which will be kept clean at all times by the contractor. Free range urination/ defecation will not be allowed	Construction phase	US\$2,000/ site	Contractor	Sanitary facilities for workers
Community Health and Safety, and Security	<u>Construction phase</u> ✓ Works on exposed trenches and earth materials will, as much as possible, be completed before new earth dug and trenches are created.	Construction phase	-	Contractor	No overdue exposed trenches
	✓ Work areas to be hoarded off adequately to avoid inquisitive trespassers especially children	Construction phase	Part of project costs	Contractor	Work areas adequately hoarded
	✓ Warning signs to be posted around work areas to discourage trespassers	Construction phase	Part of project costs	Contractor	Warning signs posted
	✓ Contractors to maintain adequate security at construction sites to avoid pilfering or vandalising of property	Construction phase	Part of project costs	Contractor	Security provided
	✓ Visibility to be ensured in the night time by providing				

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<p>adequate lighting</p> <p>✓ Construction workers educated on personal and community health issues. Protection eg., condoms provided against sexually transmitted diseases and particularly sexual violence against women and minors in the community</p> <p>✓ Contractor to provide procedures to identify and report gender based violence perpetuated by workers and mechanisms to deal with perpetrators and survivors as part of a GBV action plan.</p> <p>✓ On completion of the works, all temporary installations will be dismantled, all plant and equipment de-mobilized, waste and left over materials and debris removed by the contractor, and the site left clean and tidy</p> <p>✓ Bulldozer, hydraulic excavator, pumps, generator, vehicles and other equipment and machinery used for the project will be relocated to new or other project sites in the country managed by the contractor.</p> <p>✓ Encourage community leadership to form watch committees to improve security</p> <p>✓ Institute procedures to avoid/ mitigate incidences of sexual violence against women and minors and also procedures to support survivors</p> <p>✓ Have separate, safe and easily accessible facilities for women and men working on the site. Locker rooms and/or latrines should be located in separate areas, well-</p>	<p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Operational phase</p> <p>Operational phase</p> <p>Operational phase</p>	<p>Part of project costs</p> <p>US\$2,500/ site</p> <p>US\$3,000/ site</p> <p>Part of project costs</p> <p>Part of project costs</p> <p>US\$3,000/ site/ year</p> <p>US\$2,000/ site/ year</p> <p>Part of</p>	<p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Facility operator</p> <p>Facility operator</p> <p>Facility operator</p>	<p>Adequate lighting at night</p> <p>Workers educated on health issues</p> <p>Procedures available to identify and report GBV</p> <p>Temporary installations dismantled and removed after construction</p> <p>Equipment relocated after construction</p> <p>Watch committees formed</p> <p>Procedures in place to avoid sexual violence</p> <p>Separate and safe facilities for</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<ul style="list-style-type: none"> lit and include the ability to be locked from the inside. ✓ Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where VAWG is prohibited. ✓ As appropriate, public spaces around the project grounds should be well-lit. ✓ Work with police force to provide police posts at all major project areas ✓ First aid facilities to be available at all sites with suitable arrangements with local health facilities to deal with emergencies 	<p>Operational phase</p> <p>Operational phase</p> <p>Operational phase</p> <p>Operational phase</p>	<p>operational costs</p> <p>US\$1,000/ site</p> <p>Operational costs</p> <p>US\$2,000/ site/ year</p> <p>US\$1,000/ site/ year</p>	<p>Facility operator</p> <p>Facility operator</p> <p>Facility operator</p> <p>Facility operator</p>	<p>male and females</p> <p>Visible signs</p> <p>Well lit public places</p> <p>Police posts provided</p> <p>First aid facilities provided</p>
Traffic management	<ul style="list-style-type: none"> ✓ Contractors to provide traffic management plans to be approved by relevant authorities and client, if deemed necessary ✓ Adequate alternative arrangements to be made to minimize impact on motorist and pedestrians within existing tourist sites ✓ Works to be completed on time to minimize inconvenience to motorists and pedestrians ✓ Adequate road signs to be planted on access roads to limit vehicular speeds ✓ Construct properly designed speed ramps on access roads 	<p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Operational phase</p> <p>Operational phase</p>	<p>US\$3,500/ site</p> <p>As part of project costs</p> <p>-</p> <p>Operational cost</p> <p>Operational cost</p>	<p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Facility operator</p> <p>Facility operator</p>	<p>Approved traffic management plans</p> <p>Alternative transport arrangements</p> <p>Timely completion of works</p> <p>Road signs with speed limits</p> <p>Speed ramps</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
Labour issues	<ul style="list-style-type: none"> ✓ Project to supervise implementation of the Labor Management Procedures given in the Annex ✓ Follow and apply the national labour laws to ensure good wages and working conditions ✓ Follow well- laid out recruitment processes to engage experienced artisans for construction works ✓ Child labour will not be allowed ✓ Include specific measures in site specific ESMPs 	<ul style="list-style-type: none"> Construction/ operational phases Construction/ operational phases Construction phase Construction phase Construction phase 	<ul style="list-style-type: none"> Project costs - - - - 	<ul style="list-style-type: none"> Contractor/ facility operators Contractor/ facility operator Contractor Contractor Contractor 	<ul style="list-style-type: none"> Implementation arrangements in place Implementation arrangements in place Implementation arrangements in place No children on site Specific measures in ESMP
Occupational health and safety	<ul style="list-style-type: none"> ✓ All workers should be given proper induction/orientation on safety. ✓ The contractors will have a Health & Safety Policy and procedures to guide the construction activities.⁴ ✓ Regularly service all equipment and machinery to ensure they are in good working condition. ✓ Ensure there are first aid kits on site and a trained person to administer first aid. ✓ Provide and enforce the use of appropriate personal protective equipment (PPE) such as safety boots, reflective jackets, hard hats, hand gloves, earplugs, nose masks, etc. ✓ Proof of competence for all equipment/machine 	<ul style="list-style-type: none"> Construction phase Construction phase Construction phase Construction phase Construction phase 	<ul style="list-style-type: none"> - - - US\$1,000/ site US\$1,000/ site 	<ul style="list-style-type: none"> Contractor Contractor Contractor Contractor Contractor 	<ul style="list-style-type: none"> Workers given training on safety Health and safety policy in place Equipment in good working conditions First aid kits on site PPEs provided and in use

⁴ Health and Safety Guidelines: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<p>operators will be required and established through inspection of valid drivers or operator's license or documents.</p> <ul style="list-style-type: none"> ✓ Comply with all site rules and regulations. ✓ Apply sanctions where safety procedures are not adhered to. ✓ Site meetings should create awareness on OHS. ✓ Construction workers educated on personal and public health issues. Protection eg., condoms provided against sexually transmitted diseases and consequences of abuses (especially sexual) against host community members ✓ Staff to be given regular training on Hospitality and self-protection against violence particularly for the women/ girls ✓ Offenders will be appropriately sanctioned; ✓ Management may institute incentive packages for workers who identify and report untoward situations 	<p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Construction phase</p> <p>Operational phase</p> <p>Operational phase</p> <p>Operational phase</p>	<p>-</p> <p>-</p> <p>-</p> <p>-</p> <p>-</p> <p>-</p> <p>-</p>	<p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Contractor</p> <p>Facility operator</p> <p>Facility operator</p> <p>Facility operator</p>	<p>Proof of competence for operators</p> <p>Compliance with rules</p> <p>Sanctions applied when required</p> <p>Awareness on OHS</p> <p>Workers educated on health issues</p> <p>Staff trained on hospitality and self-protection</p> <p>Offenders sanctioned</p> <p>Incentive packages for workers</p>
Gender based Violence (Sexual Exploitation and Abuse and Sexual Harassment)	<ul style="list-style-type: none"> ✓ Staff to be given regular training on Hospitality and self-protection against violence particularly for the women/ girls ✓ Due to the sensitive nature of sexual abuse cases and the need to respect the privacy and wishes of survivors, the redress techniques should be considered differently from the general GRM methods. 	<p>Construction/ operational phases</p> <p>Construction/ operation phases</p>	<p>US\$2,000/ site/ year</p> <p>US\$2,500/ site/ year</p>	<p>Contractor/ facility operator</p> <p>Contractor/ facility operator</p>	<p>Trained staff on hospitality</p> <p>Different redress mechanism established for GBV cases</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Recommended period of implementation	Budget estimates	Responsible authority for implementation of measures	Performance indicators
	<ul style="list-style-type: none"> ✓ A GBV specialist may be hired by the PCU to carry out GBV risk assessments to determine the level of attention and the mitigation options and techniques required at each project site through the development of a GBV action plan. GBV action plan will include a service provider mapping, establishment of clear referral pathway for GBV response, GBV sensitization and outreach plans, code of conduct for project workers etc. ✓ The contractor will implement the GBV Action Plan with support from the GBV specialist or an identified service provider. ✓ If required, trained outreach staff will be stationed within each project community and will be required to identify and report all cases to the appropriate authorities 	<p>Pre- Construction phases</p> <p>Construction phase</p> <p>Construction/ operational phases</p>	<p>US\$20,000</p> <p>Contractor</p> <p>US\$2,000/ site/ year</p>	<p>PCU</p> <p>Contractor/ GBV specialist</p> <p>Contractor/ facility operator</p>	<p>GBV specialist hired</p> <p>Action plan implemented</p> <p>Trained outreach staff in project communities</p>
Cultural Heritage	<ul style="list-style-type: none"> ✓ Traditional authority responsible for sanctity of local shrines properly identified and consulted ✓ Necessary cultural rites agreed with community and performed prior to access to sites and at pre-determined time periods 	<p>Pre- construction phase</p> <p>Pre- construction phase</p>	<p>-</p> <p>-</p>	<p>PCU</p> <p>PCU/ community</p>	<p>Traditional authority consulted</p> <p>Cultural rites performed</p>

7.7 Grievance Redress

Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. The management of grievances is therefore a vital component of stakeholder management and an important aspect of risk management for a project. Grievances and disputes that may arise during the course of implementation of the EDP will be related to the following issues among others:

- Siting of the project/subproject;
- Mistakes in inventorying or valuing properties;
- Disagreement on property boundaries, either between the affected person and the expropriation agency or between two neighbours;
- Disputed ownership of a given asset (two or more affected people claim that the affected asset is theirs);
- Disagreement on asset valuation methods and compensation amounts in cash or in-kind;
- Successions, divorces, and other family issues resulting in disputed ownership or disputed shares between inheritors or family members;
- Disagreement with the computation of the resettlement or livelihood assistance or transportation cost;
- Claims by people who relocated on their own after receiving notification about the project and the likelihood of impact on their activities; and
- Delays in resolving complaints of PAPs.

The general steps of the grievance process comprise the following which will include a feedback process for complainants to get responses within agreed time frames:

- Registration/receipt of Complaints;
- Determining and Implementing the Redress Action;
- Verifying the Redress Action;
- Monitoring and Evaluation; and
- Dissatisfaction and Alternative Actions.

Registration/ receipts of complaints

The PCU will establish a register of resettlement/compensation related grievances and disputes. The receipt of complaints will include its logging and registration as this will help with monitoring the status of the grievances and ease reporting on them. The existence and conditions of access to this register (where, when, how) will be widely disseminated within the project community/town as part of the consultation undertaken for the project in general.

For the tourist project sites, the complaints will be lodged verbally or in writing directly by the affected person or through the local Headman/woman to the District Council Office representative designated to receive all complaints. A designated member of the Ward Committee for the project area could also receive complaints from PAPs (because the Ward Committee is within the community and is closer to the PAPs and some PAPs may prefer to

route their complaints through the Committee and avoid undue transport and time cost to the District office). The Committee will ensure that such complaints reach the District Office representative designated to receive complaints within 24 hours via phone call or through any other means. The person assigned the responsibility at the District Council shall receive all complaints and shall officially register these complaints using the first section of the proposed complaint registration and resolution form provided in **Annex 5**. The District Council representative will inform the National Tourist Board representative (officer/warden) on the Grievance Redress Team within 24 hours on any complaint lodged.

At the Solution Centers, the SMEDA safeguard person will be in regular contact with the operators of the Centers to ensure that any complaints are dealt with within designated time periods.

For cases involving gender based violence, the GBV outreach staff who will be stationed in project communities will intervene and ensure that satisfactory actions as proposed in the ESMF, are taken to support the survivor.

Determining and implementing the redress action

When a grievance/dispute is recorded as per above-mentioned registration procedures, the Grievance Redress Team (GRT) will be called into action, and mediation meetings will be organized with interested parties. Minutes of meetings will be recorded.

The GRT will first investigate the foundation of the grievance and then determine the redress action in consultation with the complainant and concerned party if necessary. Otherwise, the grievance redress team will communicate to the complainant on the acknowledgement of the grievance, the redress action proposed and the timeframe for implementation.

The proposed redress action and the timeframe in which it is to be implemented will be discussed within 5 working days of receipt/registration of the grievance. The grievance issue should be resolved within 10 working days of receipt of complaints.

Verifying the redress action

The grievance redress team will visit the affected property site or get in touch with the complainant to confirm that the redress action is carried out. If the complainant is dissatisfied with the outcome of the redress proposal or action, additional steps may be taken to resolve the issue or reach an amicable agreement. Verification should be completed within one week of execution of the redress action.

Monitoring and Evaluation

The Monitoring and Evaluation Team will monitor the activities of the Grievance Redress Team to ensure that complaints and grievances lodged by PAPs are followed-up and resolved amicably as much as possible.

Dissatisfaction and Additional Steps

2nd Tier Amicable Mediation and Settlement

If the complainant is not satisfied with the decision of the grievance redress team, he/she can bring it to the attention of the Safeguard Officer at the PCU to draw the attention of PCU to the unresolved grievance. Otherwise the GRT should forward the issue directly to PCU for further action. The PCU in consultation with the Ministry of Finance will set up an appropriate mediation team to resolve the issue within 2 weeks from the date of receipt of such a decision by PCU. If such a time line is not possible, the PCU should inform the GRT and the complainant accordingly giving reasons and possible new date.

Appeal to Court

If the complainant remains dissatisfied with the mediation effort of EDP PCU and the MTCA/ SMEDA, the complainant has the option to pursue appropriate recourse via judicial process in Sierra Leone. The Constitution allows any aggrieved person the right of access to Court of law. Courts of law will be a “last resort” option, in view of the above mechanism.

Membership, Function and Financing of the GRT

The Grievance Redress Team (GRT) will include the following:

- Representative of the National Tourist Board (Officer/ Guide/ Warden)
- Representative of the relevant District Council;
- Representative of the Ward Committee for the project area; and
- Representative of the traditional authority.

The Tourist Board and the District Council should ensure that at least one of the GRT members is a woman. In addition to the main function of resolving grievances, disputes, complaints and conflicts, the GRT will also:

- i. Ensure smooth implementation of the resettlement instrument;
- ii. Establish dialogue with the PAPs; and
- iii. Ensure that their concerns and suggestions are incorporated and implemented during the project.

The grievance redress teams will be made known or be set up as soon as land acquisition or resettlement plan preparation starts. Disputes can arise from census operations and preliminary siting of subprojects and it is therefore important that the mediation mechanisms be available to cater for claim, disputes and grievances at the early stage. The activities of the GRT will be financed by PCU.

The GRM would have specific procedures for GBV including confidential reporting with safe and ethical documenting of GBV cases. Parallel GRM outside of the project GRM may be warranted for substantial to high risk situations.

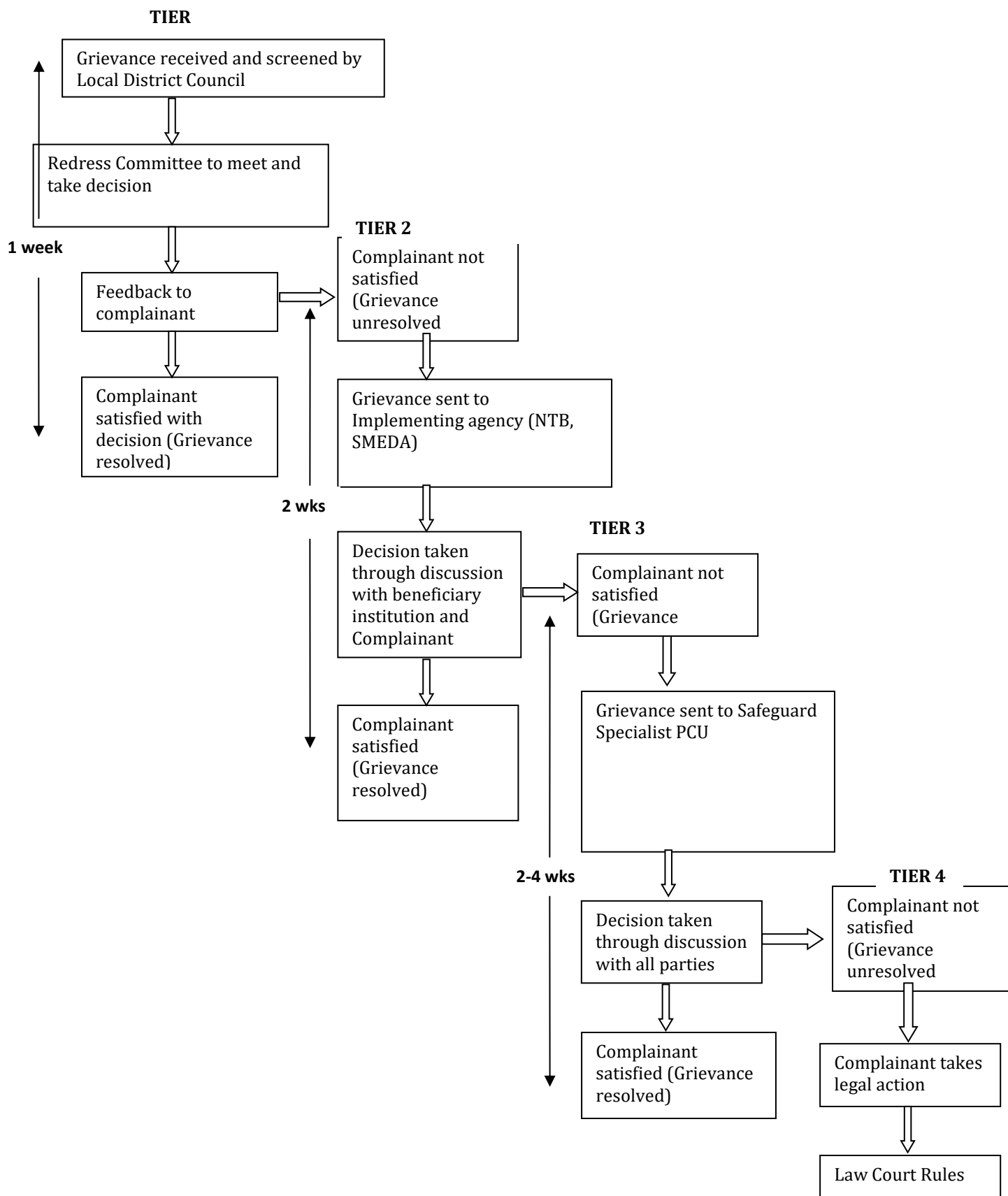
The grievance management guide is provided in the table below.

Table 7: Grievance redress

Steps	Process	Description	Timeline Maximum	Other information
1	Identification of grievance	Face to face; phone; letter, e-mail; recorded during public/community	1 Day	Email address; hotline number

Steps	Process	Description	Timeline Maximum	Other information
		interaction; others		
2	Grievance assessed and logged	Significance assessed and grievance recorded or logged (i.e. in a log book)	4-7 Days	Significance criteria Level 1 –one off event; Level 2 – complaint is widespread or repeated; Level 3- any complaint (one off or repeated) that indicates breach of law or policy or this ESMF/RPF provisions
3	Grievance is acknowledged	Acknowledgement of grievance through appropriate medium	7 Days	
4	Development of response	-Grievance assigned to appropriate party for resolution -Response development with input from management/ relevant stakeholders	4-7 Days 10-14 Days	
5	Response signed off	Redress action approved at appropriate levels	4-7 Days	Senior management staff of MoF should sign off
6	Implementation and communication of response	Redress action implemented and update of progress on resolution communicated to complainant	10-14 Days	
7	Complaints Response	Redress action recorded in grievance log book Confirm with complainant that grievance can be closed or determine what follow up is necessary	4-7 Days	
8	Close grievance	Record final sign off of grievance If grievance cannot be closed, return to step 2 or refer to sector minister or recommend third-party arbitration or resort to court of law	4-7 Days	Final sign off on by MoF

A flow chart depicting the process is given below:



Proposed electronic means of data/ information collection and management

It is proposed to equip safeguard persons especially those dealing with grievance issues to employ electronic means of collecting and transmitting information, that is, through the use of the Open Data Kit (ODK). This is an extensible, open-source suite of tools designed to build information services which runs on a variety of android phones and tablets. The ODK solves many issues usually associated with paper-based data collection systems by creating a system which can be used by minimally-trained individuals, and it remains robust despite intermittent power and connectivity challenges.

ODK Collect deals with data input and manipulation of data types such as text, GPS location, images, audio and video, if required. The project may consider engaging the Services of an IT database specialist to design and install the software on devices running on the Android operating system (smartphones and tablets), and by displaying prompts to the user in a one-prompt-at-a-time format. The field officers including GBV outreach staff may electronically send records to ODK Aggregate (at the end of the day or week), which is a server supporting data upload and temporary storage before being transferred by the touch of a Button, to the local database created for the project. This electronic method will enable easier and faster data collection, a seamless transfer and collation of information from project sites to the PCU. Information sharing is instant and usual errors associated with paper reporting are avoided.

7.8 Monitoring and Evaluation

Monitoring plans will be developed to track safeguard progress at both the ESMF and sub-project activity level. The proposed plans are presented in the table below. The table confirms the verifiable indicators as well as responsibilities for the various monitoring actions.

The monitoring issues at the ESMF level include confirmation of the dissemination of both ESMF and RPF documents as well as capacity building and training activities. At the sub-project activity level, this will encompass instituting monitoring actions to, for example, confirm the Screening of projects, Preparation of the ESIA and GBV reports, Acquisition of environmental Permits etc The progress monitoring reports will be submitted to the Bank on a quarterly basis.

Table 8: Environmental and Social Monitoring Plan

Identified negative impact for mitigation	Recommended Mitigation Measures	Performance indicators	Responsibility for monitoring	Monitoring means	Recommended frequency for monitoring
Water Resources and pollution	✓ Works not to be executed under aggressive weather conditions such as rains or stormy conditions.	No work done during aggressive weather	Supervising engineer/ PCU	Field inspections	Daily
	✓ No solid waste, fuels, or oils to be discharged into any section of a waterway.	Waste not discharged in waterways	Supervising engineer/ PCU	Field inspections/ reports	Daily
	✓ Construction to be done in phases to minimize impacts and exposure of soil.	Construction work executed in phases	Supervising engineer/ PCU	Field inspections/ reports	Monthly
	✓ Excavated materials and silt, which cannot be used will be disposed of at appropriate sites as per the Waste Management Plan prepared by contractor and approved by the relevant authority.	Unusable material disposed of at appropriate sites per Waste Management Plan	Supervising engineer/ PCU	Field inspections/ reports	Daily
	✓ Temporary sediment barriers to be installed on slopes to prevent silt from entering water courses.	Constructed temporary barriers at appropriate locations	Supervising engineer/ PCU	Field inspections	Weekly
	✓ Maintenance, fueling and cleaning of vehicles and equipment to take place at off-site workshop with adequate leakage prevention measures	Off- site workshops for maintenance of vehicles	Supervising engineer/ PCU	Field inspections	Quarterly
	✓ Waste collection and disposal facilities to be provided for community, tourists and SME Solution Centers to minimize waste and pollution of water	Waste collection and disposal facilities provided	SMEDA/ NTB	Field inspections	Quarterly
Air quality, Vibration and Noise	✓ The working times and construction schedule will be coordinated rationally for all the various construction and engineering companies which will be on site;	Schedule prepared for construction activities on site	Supervising engineer/ PCU	Reports	Beginning of construction
	✓ Neighboring offices and communities will be duly informed early of all demolition/constructional activities.	Neighbouring offices and communities informed	Supervising engineer/ PCU	Field inspections/ reports	Beginning of construction
	✓ The construction and other engineering firms will	Firms selected based on			

Identified negative impact for mitigation	Recommended Mitigation Measures	Performance indicators	Responsibility for monitoring	Monitoring means	Recommended frequency for monitoring
	<p>be selected for the project based on their ability to adopt acceptable engineering practices and their possession of suitable equipment holdings to ensure low noise and air quality emission;</p> <p>✓ Loading and transportation of demolition debris shall be done during daytime and will avoid relatively noisy equipment operating during the night;</p> <p>✓ Stock piles of debris will be covered to prevent re-suspension of dust into the air;</p> <p>✓ On-site mixing of cement, sand stone and other constructional materials will be done in an enclosed space and these materials shall be stored in an enclosed yard or covered tightly;</p> <p>✓ Speed limit shall be set for construction and transportation vehicle both within and outside the project site to avoid re- entrainment of dust; and</p> <p>✓ A water bowser will be available on site for frequent dousing or sprinkling to suppress dust from earthworks.</p> <p>✓ Adequate road signs to be planted on dust roads to limit vehicular speeds</p> <p>✓ Properly designed and constructed speed ramps on access roads</p>	<p>clearly defined criteria</p> <p>Loading and transportation of debris in day time</p> <p>Covered stock piles of debris</p> <p>Enclosed spaces for cement mixing</p> <p>Project drivers duly informed of applicable speed limits</p> <p>Frequent dousing to suppress dust</p> <p>Road signs on dust roads</p> <p>Speed ramps</p>	<p>Ministry of Finance</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>SMEDA/ NTB</p> <p>SMEDA/ NTB</p>	<p>Evaluation reports</p> <p>Field inspections/ reports</p> <p>Field inspections/ reports</p> <p>Field inspections</p> <p>Field inspections</p> <p>Field inspections/ reports</p> <p>Field inspections</p> <p>Field inspections</p>	<p>Pre- construction</p> <p>Monthly</p> <p>Monthly</p> <p>Monthly</p> <p>Monthly</p> <p>Monthly</p> <p>Monthly</p> <p>Quarterly</p> <p>Quarterly</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Performance indicators	Responsibility for monitoring	Monitoring means	Recommended frequency for monitoring
Visual intrusion	✓ Community to be well informed of upcoming project using appropriate signages and display boards prior to contractor accessing sites;	Signages and display boards	Supervising engineer/ PCU	Field inspections	Pre- construction
	✓ Construction activities to be done in sections to reduce impacts of change and visual intrusions to the general public.	Construction sectioned appropriately	Supervising engineer/ PCU	Field inspections/ reports	Monthly
	✓ The construction sites to be hoarded off from public view.	Hoarded sites	Supervising engineer/ PCU	Field inspections	Weekly
	✓ Good housekeeping measures, such as regular cleaning, to be maintained at the construction site.	Tidy construction sites	Supervising engineer/ PCU	Field inspections	Weekly
	✓ Ensure an acceptable post-construction site as per provisions in the contract.	Acceptable post-construction site	Supervising engineer/ PCU	Field inspections/ PCU	Post construction
	✓ Facilities will be properly designed and constructed to blend with the existing environment	Facilities blending with existing environment	PCU	Field inspection/ design report	Pre- construction
Land acquisition Resettlement and compensation issues	✓ Avoid displacement or resettlement to the extent possible by exploring alternative locations, re-routing and feasible design options.	Minimum displacement/ resettlement	SLEPA/ WB	Reports	Design phase
	✓ Where displacement or resettlement is unavoidable, Consult affected property owners/users/ communities and seek their consent early in the project development process.	Early consultations in accordance with project engagement plan	SLEPA/ WB	Reports	Pre- construction
	✓ Develop a resettlement action plan to guide compensation of impacts	Compensation in accordance with RAP	SLEPA/ WB	Reports	Pre- construction

Identified negative impact for mitigation	Recommended Mitigation Measures	Performance indicators	Responsibility for monitoring	Monitoring means	Recommended frequency for monitoring
	<ul style="list-style-type: none"> ✓ Allow affected persons to salvage their properties (including crops) before mobilizing to site to start work ✓ Ensure fair and adequate compensation is paid to all affected persons prior to commencement of construction activities as per the provisions of the RPF ✓ Obtain the required developmental permits from the respective authorities before start of work ✓ A formal grievance redress mechanism to be established and implemented 	<p>Affected persons' properties salvaged</p> <p>Affected persons received fair and adequate compensation</p> <p>Permits acquired</p> <p>Grievance redress mechanism in place</p>	<p>SLEPA</p> <p>SLEPA/ WB</p> <p>SLEPA/ WB</p> <p>SLEPA/ WB</p>	<p>Field inspections/ reports</p> <p>Reports/ interviews with PAPs</p> <p>Reports/ Permits</p> <p>Reports</p>	<p>Pre- construction</p> <p>Pre- construction</p> <p>Pre- construction</p> <p>Monthly</p>
Livelihood Issues	<ul style="list-style-type: none"> ✓ Ensure appropriate compensations are paid to PAPs as defined in the RPF; ✓ Employment and other opportunities to be given to local communities as much as possible. ✓ Frequent on-the job training on hospitality courses for tourism workers to enhance tourist visits and business ✓ Staff at Solution Center will be trained to become trainers in safeguards for beneficiaries 	<p>Compensation paid</p> <p>Local community members in employment</p> <p>Trained workers</p> <p>Trained staff</p>	<p>SLEPA/ WB</p> <p>PCU/ engineer Supervising</p> <p>NTB</p> <p>SMEDA</p>	<p>Reports/ Interviews</p> <p>Reports/ Interviews Reports</p> <p>Reports</p>	<p>Pre- construction</p> <p>Pre- construction</p> <p>Bi- annual</p> <p>Bi- annual</p>
Generation and disposal of wastes	<p>Apply the principles of Reduce, Recycle, Reuse and Recover for waste management through the following actions:</p> <ul style="list-style-type: none"> ✓ Excavated earth materials will, as much as possible, be re-used for back filling purposes to reduce 	<p>Excavated material reused for backfilling</p>	<p>Supervising engineer/ PCU</p>	<p>Field inspections</p>	<p>Weekly</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Performance indicators	Responsibility for monitoring	Monitoring means	Recommended frequency for monitoring
	<p>waste</p> <p>✓ Ensure that the required amounts of construction materials are delivered to site to reduce the incidence of excess material</p> <p>✓ Provide bins on site for temporary storage of garbage such as lubricant containers, drinking water sachets/ bottles and carrier bags/packaging materials.</p> <p>✓ Ensure judicious use of construction materials such as pipes, laterites, sand, etc. to reduce waste</p> <p>✓ All metal scrap waste will be disposed of at sites approved by the relevant authorities or sold to approved third party agents for use by metal dealers.</p> <p>✓ Contractor to work according to a prepared and agreed Solid Waste Management Plan.</p> <p>✓ Project management will ensure that as part of the bidding process, contractors clearly indicate a suitable and District Council approved dumpsite for disposal of debris;</p> <p>✓ Reusable building materials like roofing sheets, windows and doors, and cement blocks may be salvaged and given to the community for use.</p> <p>✓ Waste collection bins to be sited at vantage points to serve the general public</p>	<p>Required amount of materials on site</p> <p>Bins on site for garbage</p> <p>Judicious use of materials</p> <p>Metal scraps properly disposed of</p> <p>Contractor sticking to Plan</p> <p>Contractors indicated approved dump sites in bidding document</p> <p>Salvaged materials given to community for use</p> <p>Waste collection bins on site</p>	<p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>NTB/ SMEDA</p>	<p>Field inspections</p> <p>Field inspections</p> <p>Field inspections/ reports</p> <p>Field inspections/ reports</p> <p>Reports</p> <p>Report</p> <p>Field inspection/ reports</p> <p>Field inspections</p>	<p>Weekly</p> <p>Monthly</p> <p>Monthly</p> <p>Monthly</p> <p>Monthly</p> <p>Pre- construction</p> <p>Monthly</p> <p>Quarterly</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Performance indicators	Responsibility for monitoring	Monitoring means	Recommended frequency for monitoring
	<ul style="list-style-type: none"> ✓ Warning signs to be posted at suitable locations against littering with possible sanctions indicated ✓ Proper arrangement with waste collection companies through the Councils to regularly collect and dispose of solid waste 	<p>Warning signs in place</p> <p>Contracts with Waste collection companies</p>	<p>NTB/ SMEDA</p> <p>NTB/ SMEDA</p>	<p>Field inspections</p> <p>Field inspections/ reports</p>	<p>Quarterly</p> <p>Quarterly</p>
Housekeeping and Sanitation	<ul style="list-style-type: none"> ✓ Covered dust bins will be provided on site for collection of domestic solid waste and shall be disposed of by the contractor at the identified waste dumps. ✓ Construction workers will be provided separate sanitary facilities which will be kept clean at all times by the contractor. Free range urination/ defecation will not be allowed 	<p>Covered dust bins provided</p> <p>Sanitary facilities for workers</p>	<p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p>	<p>Field inspections</p> <p>Field inspection</p>	<p>Monthly</p> <p>Quarterly</p>
Community Health and Safety, and Security	<p><u>Construction phase</u></p> <ul style="list-style-type: none"> ✓ Works on exposed trenches and earth materials will, as much as possible, be completed before new earth dug and trenches are created. ✓ Work areas to be hoarded off adequately to avoid inquisitive trespassers especially children ✓ Warning signs to be posted around work areas to discourage trespassers ✓ Contractors to maintain adequate security at construction sites to avoid pilfering or vandalising of property ✓ Visibility to be ensured in the night time by providing adequate lighting ✓ Construction workers educated on personal and 	<p>No overdue exposed trenches</p> <p>Work areas adequately hoarded</p> <p>Warning signs posted</p> <p>Security provided</p> <p>Adequate lighting at night</p>	<p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p>	<p>Field inspections</p> <p>Field inspections</p> <p>Field inspections</p> <p>Field inspections/ reports</p> <p>Field inspections</p>	<p>Weekly</p> <p>Monthly</p> <p>Monthly</p> <p>Monthly</p> <p>Quarterly</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Performance indicators	Responsibility for monitoring	Monitoring means	Recommended frequency for monitoring
	community health issues. Protection eg., condoms provided against sexually transmitted diseases and particularly sexual violence against women and minors in the community	Workers educated on health issues	Supervising engineer/ PCU	Field inspections/ reports	Monthly
	✓ Contractor to provide procedures to identify and report gender based violence perpetuated by workers and mechanisms to deal with perpetrators and survivors as part of a GBV action plan.	Procedures available to identify and report GBV	Supervising engineer/ PCU	Reports	Pre- construction
	✓ On completion of the works, all temporary installations will be dismantled, all plant and equipment de-mobilized, waste and left over materials and debris removed by the contractor, and the site left clean and tidy	Temporary installations dismantled and removed after construction	Supervising engineer/ PCU	Field inspections/ reports	Post- construction
	✓ Bulldozer, hydraulic excavator, pumps, generator, vehicles and other equipment and machinery used for the project will be relocated to new or other project sites in the country managed by the contractor.	Equipment relocated after construction	Supervising engineer/ PCU	Field inspections/ reports	Post- construction
	✓ Encourage community leadership to form watch committees to improve security	Watch committees formed	NTB	Reports	Bi- annual
	✓ Institute procedures to avoid/ mitigate incidences of sexual violence against women and minors and also procedures to support survivors	Procedures in place to avoid sexual violence	NTB	Reports	Quarterly
	✓ Have separate, safe and easily accessible facilities for women and men working on the site. Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked	Separate and safe facilities for male and females	NTB/ SMEDA	Field inspections	Bi- annual

Identified negative impact for mitigation	Recommended Mitigation Measures	Performance indicators	Responsibility for monitoring	Monitoring means	Recommended frequency for monitoring
	<p>from the inside.</p> <ul style="list-style-type: none"> ✓ Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where VAWG is prohibited. ✓ As appropriate, public spaces around the project grounds should be well-lit. ✓ Work with police force to provide police posts at all major project areas ✓ First aid facilities to be available at all sites with suitable arrangements with local health facilities to deal with emergencies 	<p>Visible signs</p> <p>Well lit public places</p> <p>Police posts provided</p> <p>First aid facilities provided</p>	<p>NTB/ SMEDA</p> <p>NTB/ SMEDA</p> <p>NTB</p> <p>NTB/ SMEDA</p>	<p>Field inspections</p> <p>Field inspections</p> <p>Reports</p> <p>Field inspections/ reports</p>	<p>Quarterly</p> <p>Quarterly</p> <p>Bi- annual</p> <p>Quarterly</p>
Traffic management	<ul style="list-style-type: none"> ✓ Contractors to provide traffic management plans to be approved by relevant authorities and client, if deemed necessary ✓ Adequate alternative arrangements to be made to minimize impact on motorist and pedestrians within existing tourist sites ✓ Works to be completed on time to minimize inconvenience to motorists and pedestrians ✓ Adequate road signs to be planted on access roads to limit vehicular speeds ✓ Construct properly designed speed ramps on access roads 	<p>Approved traffic management plans</p> <p>Alternative transport arrangements</p> <p>Timely completion of works</p> <p>Road signs with speed limits</p> <p>Speed ramps</p>	<p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>Supervising engineer/ PCU</p> <p>NTB</p> <p>NTB/ SMEDA</p>	<p>Report</p> <p>Report</p> <p>Reports</p> <p>Field inspections</p> <p>Field inspections</p>	<p>Pre- construction</p> <p>Pre- construction</p> <p>Post- construction</p> <p>Quarterly</p> <p>Quarterly</p>
Labour issues	<ul style="list-style-type: none"> ✓ Project to supervise implementation of the Labor 	Implementation	Supervising engineer/	Report	Pre- construction

Identified negative impact for mitigation	Recommended Mitigation Measures	Performance indicators	Responsibility for monitoring	Monitoring means	Recommended frequency for monitoring
	<ul style="list-style-type: none"> Management Procedures given in the Annex ✓ Follow and apply the national labour laws to ensure good wages and working conditions ✓ Follow well- laid out recruitment processes to engage experienced artisans for construction works ✓ Child labour will not be allowed ✓ Include specific measures in site specific ESMPs 	<ul style="list-style-type: none"> arrangements in place Implementation arrangements in place Implementation arrangements in place No children on site Specific measures in ESMP 	<ul style="list-style-type: none"> NTB/ SMEDA Supervising engineer/ NTB/ SMEDA Supervising engineer/ NTB/ SMEDA Supervising engineer/ NTB/ SMEDA 	<ul style="list-style-type: none"> Reports Reports Reports/ field inspections 	<ul style="list-style-type: none"> Pre- construction Pre- construction Quarterly
Occupational health and safety	<ul style="list-style-type: none"> ✓ All workers should be given proper induction/orientation on safety. ✓ The contractors will have a Health & Safety Policy⁵ and procedures to guide the construction activities. ✓ Regularly service all equipment and machinery to ensure they are in good working condition. ✓ Ensure there are first aid kits on site and a trained person to administer first aid. ✓ Provide and enforce the use of appropriate personal protective equipment (PPE) such as safety boots, reflective jackets, hard hats, hand gloves, earplugs, nose masks, etc. ✓ Proof of competence for all equipment/machine operators will be required and established through 	<ul style="list-style-type: none"> Workers given training on safety Health and safety policy in place Equipment in good working conditions First aid kits on site PPEs provided and in use Proof of competence for operators 	<ul style="list-style-type: none"> Supervising engineer/ PCU Supervising engineer/ PCU Supervising engineer/ PCU Supervising engineer/ PCU Supervising engineer/ PCU Supervising engineer/ PCU 	<ul style="list-style-type: none"> Reports Reports Reports Field inspections Field inspections Reports 	<ul style="list-style-type: none"> Monthly Pre- construction Quarterly Quarterly Monthly Quarterly

⁵ Health and Safety Guidelines: https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_exte_rnal_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

Identified negative impact for mitigation	Recommended Mitigation Measures	Performance indicators	Responsibility for monitoring	Monitoring means	Recommended frequency for monitoring
	<p>inspection of valid drivers or operator's license or documents.</p> <ul style="list-style-type: none"> ✓ Comply with all site rules and regulations. ✓ Apply sanctions where safety procedures are not adhered to. ✓ Site meetings should create awareness on OHS. ✓ Construction workers educated on personal and public health issues. Protection eg., condoms provided against sexually transmitted diseases and consequences of abuses (especially sexual) against host community members ✓ Staff to be given regular training on Hospitality and self- protection against violence particularly for the women/ girls ✓ Offenders will be appropriately sanctioned; ✓ Management may institute incentive packages for workers who identify and report untoward situations 	<p>Compliance with rules Sanctions applied when required Awareness on OHS Workers educated on health issues</p> <p>Staff trained on hospitality and self- protection Offenders sanctioned Incentive packages for workers</p>	<p>Supervising engineer/ PCU Supervising engineer/ PCU</p> <p>NTB</p> <p>NTB NTB</p>	<p>Reports</p> <p>Reports</p> <p>Reports Reports</p> <p>Reports</p> <p>Reports Reports</p>	<p>Weekly</p> <p>Weekly</p> <p>Weekly Weekly</p> <p>Quarterly</p> <p>Quarterly Quarterly</p>
Gender based Violence (Sexual Exploitation and Abuse and Sexual Harassment)	<ul style="list-style-type: none"> ✓ Staff to be given regular training on Hospitality and self- protection against violence particularly for the women/ girls ✓ Due to the sensitive nature of sexual abuse cases and the need to respect the privacy and wishes of survivors, the redress techniques should be considered differently from the general GRM methods. ✓ A GBV specialist may be hired by the PCU to carry 	<p>Trained staff on hospitality</p> <p>Different redress mechanism established for GBV cases</p>	<p>Supervising engineer/ PCU/ NTB</p> <p>Supervising engineer/ PCU/ NTB</p> <p>SLEPA/ WB</p>	<p>Reports/ interviews</p> <p>Reports/ interviews</p> <p>Reports/</p>	<p>Quarterly</p> <p>Pre- construction/ operation</p> <p>Pre- construction</p>

Identified negative impact for mitigation	Recommended Mitigation Measures	Performance indicators	Responsibility for monitoring	Monitoring means	Recommended frequency for monitoring
	<p>out GBV risk assessments to determine the level of attention and the mitigation options and techniques required at each project site through the development of a GBV action plan. GBV action plan will include a service provider mapping, establishment of clear referral pathway for GBV response, GBV sensitization and outreach plans, code of conduct for project workers etc.</p> <p>✓ The contractor will implement the GBV Action Plan with support from the GBV specialist or an identified service provider.</p> <p>✓ If required, trained outreach staff will be stationed within each project community and will be required to identify and report all cases to the appropriate authorities</p>	<p>GBV specialist hired</p> <p>Action plan implemented</p> <p>Trained outreach staff in project communities</p>	<p>Supervising engineer/ GBV specialist/ PCU</p> <p>Supervising engineer/ NTB/ SMEDA/ PCU</p>	<p>interview</p> <p>Reports</p> <p>Reports/ interviews</p>	<p>Quarterly</p> <p>Bi- annual</p>
Cultural Heritage	<p>✓ Traditional authority responsible for sanctity of local shrines properly identified and consulted</p> <p>✓ Necessary cultural rites agreed with community and performed prior to access to sites and at pre-determined time periods</p>	<p>Traditional Authority known</p> <p>Rites performed</p>	<p>PCU</p> <p>PCU/ community</p>	<p>Reports</p> <p>Reports/ interviews</p>	<p>Pre- construction</p> <p>Annual</p>

7.9 Institutional Strengthening and Capacity Building

The current capacity available to implement the ESMF at the PCU and the Implementing agencies is limited. There is the need to equip identified persons with the understanding, skills and access to information, knowledge and training to enable them to perform effectively as safeguard persons.

The capacity building will include training workshops and production of guidance reports and tools. The following training programs specific to the requirements of the institutions and project persons will be carried out, listed in Table 9. A further capacity needs assessment will be prepared to identify other necessary training required for the selected safeguards focal persons from the relevant institutions.

Table 9: Training modules and proposed participants

No	Training content	Participants
1.	<ul style="list-style-type: none"> World Bank Safeguard policies of OP 4.12 and OP 4.01; EPA- SL Environmental Assessment Regulations ESMF/ RPF Training of Grievance committee 	PCU PCU safeguard specialist, Implementing agencies- MTI, MTCA, SMEDA, DSTI etc
2.	<ul style="list-style-type: none"> Screening Checklist, ToR for PCU safeguard person ToR for Implementing agencies Safeguard focal persons 	Implementing agencies safeguard persons, PCU safeguard specialist
3.	<ul style="list-style-type: none"> Preparation of Terms of Reference and MOUs for ESIA and ARAPs/ RAPs and GBV specialists/ NGO 	Implementing agencies safeguard persons, PCU safeguard specialist
4.	<ul style="list-style-type: none"> Environmental and Social Management Plans GBV mitigation plans Grievance redress registration and resolution Safeguard monitoring and reporting formats IT based digital information collection Code of Conduct for contractors 	Implementing agencies safeguard persons, Contractors, Supervising engineers, Community persons/ Outreach staff

The participants at the training programmes will therefore range from the relevant staff of the PCU to selected community members from site- specific project locations. For many of the community members who will be invited to attend, the purpose will be towards creating awareness of safeguard issues as well as for grievance reporting and resolution procedures.

As much as possible, these training and awareness creation workshops will be decentralized to project locations and the content of the discussions will then focus on site- specific issues. As a result, large numbers of participants at specific meetings will be avoided.

Training manuals and safeguards reporting formats will be prepared to assist safeguard focal points to carry out their functions. Consultants may be hired to produce manuals and checklists as and when required by the project.

7.10 Roles and responsibilities

The respective roles and responsibilities of assigned safeguards specialists are summarized below:

PCU Safeguards specialist

The PCU safeguard specialist will be responsible for:

- Coordination of environmental and social safeguards across all projects
- Provide leadership in safeguard implementation across the project components and entire project sites
- Providing guidance and project level information and tools on safeguards for all stakeholders
- Assist in managing and monitoring the environmental and social safeguard experts (consultants)
- Responsible for coordinating all safeguard activities with the EPA- SL, WB and implementing agencies
- Oversee all environmental and social safeguard training and capacity building activities
- Any other activities/ responsibilities that may emerge

Safeguard consultants

Consultants who are conversant with the WB safeguard policies and their instruments and application will be hired periodically as and when required to prepare specific safeguard documents to complement the work of the safeguards specialists. The consultants' level of understanding will be adequate to facilitate training and other capacity related activities on safeguards including GBV issues.

Implementing agencies safeguards focal persons

The Safeguard Focal Points will be given training to be competent in safeguards implementation, and will

- Supervise the site- specific project activities to ensure that all environmental and social safeguards issues are incorporated into Bid and specifications documents for all sub project types.
- Ensure that safeguards issues are included as part of the training at the project level and contractors invited to participate.
- Draft safeguards reports based on collated documents and reports from project activities as part of usual reporting on the project.

- Be the first point of contact for the project in case of any challenging issues on project-related safeguards - land, environmental, GBV, safety and health and draw the PCU safeguard specialists' attention in case of lack of resolution
- Collaborate with relevant authorities including the community (traditional authority) and other community members and facilitate the implementation of subprojects and implementation of any other safeguards related activity.
- Perform any other related activities that may be assigned by the PCU safeguard specialists to whom s/he will report.

The implementation activities will be under the overall guidance of the PCU. The responsibilities of the various institutions are presented in the table below.

Table 10: Institutional responsibilities

No.	Institution	Responsibility
1.0	Project Coordinating Unit	<ul style="list-style-type: none"> • Overall supervision of the ESMF. • Trigger the process through application of the environmental and social screening checklist
2.0	Implementing agencies	<ul style="list-style-type: none"> • Assist with environmental and social screening of subprojects and initial identification of PAPs • To assist in grievance redress matters
3.0	Environmental Protection Agency (EPA)	<ul style="list-style-type: none"> • Review screening reports and advise on level of environmental assessment if necessary • Assist with training and capacity building of other institutions
4.0	Ministry of Environment, Lands and Country Planning	<ul style="list-style-type: none"> • Assist with land cases including the valuation of assets and compensation payments
5.0	District Council, Traditional authorities, Ward Committees	<ul style="list-style-type: none"> • To assist with community awareness creation • To assist in grievance redress matters
6.0	Consultants/NGO	<ul style="list-style-type: none"> • Prepare ESIA and other documents (GBV) if necessary and assist with implementation and capacity building.
7.0	World Bank	<ul style="list-style-type: none"> • To coordinate the Program at highest decision-making level • To supervise/ monitor and advise on safeguards implementation

7.11 Budgetary provisions

The awareness creation, capacity improvement and training workshops as well as some logistic support expenses for key stakeholders involved in the implementation of proposed interventions is estimated at **US\$375,000** over the 5- year project life as explained in the **Table 11** below which is inclusive of estimates provided in the management plan.

Table 11: Budget provisions

#	Item	Unit	Unit Cost US\$	No	Total Cost US\$	Source of financing
1	Preparation of specific reports (ESIA, ESMP, GBV Plans, LIMP), Stakeholder meetings and Disclosures	No reports/ site (for 7 sites)	15,000	7	105,000	Project funds
2	Capacity Building	No of training workshops/ year for 5 years	5,000	2	50,000	Project funds
3	Implementation of specific ESMPs including GBV plans	Purchase of equipment eg. PPEs/ year	5,000	5 years	25,000	Project funds
		Cost of meetings/ year	5,000	5 years	25,000	Project funds
		GBV plans at all project sites/ year	20,000	5 years	100,000	Project funds
		IT based data collection	5,000	5 years	25,000	Project funds
4	Mid-term audit of ES performance	No	20,000	1	20,000	Project funds
5	Completion audit of ES performance	No	25,000	1	25,000	Project funds
	Total				375,000	

8 STAKEHOLDER CONSULTATION

The key stakeholders were engaged at various times and occasions to discuss issues that may arise from the implementation of the EDP, as well as gain an insight into the legal and institutional framework available to support its implementation. A report on the consultation is provided in the **Annex 3** which includes the few concerns and issues raised by the various stakeholders. These have been incorporated in the report and possible mitigation measures have been included. The stakeholders were engaged within their respective communities and also in government institutions during May 2018 and in 2019. Generally, all the communities sampled for consultation were pleased with the project intention and are confident that, if they are given the necessary support to manage the tourist sites as purported by the project, their living conditions would improve drastically. They are willing to provide land for the project and other needed assistance to bring the project to fruition.

Table 12: Some key organizations/ communities engaged during preparation of ESMF

No	Organization/ Community	Persons consulted and Position
1.	Ministry of Finance	Alimamy Bangura, Director of Economic Policy and Research Unit
2.	Ministry of Tourism and Cultural Affairs	Mohamed Jalloh, Director of Tourism
3.	Ministry of Works, Housing and Infrastructure	Abu Bakarr Jalloh, Director of Housing
4.	Ministry of Works, Housing and Infrastructure	Alphasor Bah, Snr Quantity Surveyor Ajah Fillie-Faboe, Chief Building Inspector Tamba P. Ngegba, Senior Building Inspector
5.	Ministry of Transport and Aviation	Abdul S. Sanusi, Planning Officer
6.	National Tourist Board	Fatmata Abe-Osagin, Deputy General manager Umaru Woody, Planning and Development Manager Yassin Kargbo, General manager
7.	SME Development Agency	Sharka Sannoh, CEO
8.	Tacugama Chimpanzee Sanctuary	Aram Kazandjar, Manager
9.	No. 2 River Development Association	Daniel Macauley, Secretary General; Victor Harding, Chairman; Yusufu O. Dumbuya, Barman; Theophilus Mansuray, Elder
10.	Pottor Levuma Beach Organization	Alhaji M. Bangura, Member; Jane Turay, Chair Lady, Ward Committee; Santigie Kargbo, Organizing Secretary
11.	Lakka Community	Tommy Douglas, Land/ Business Owner
12.	Banana Island	Eric Thompson, Deputy Headman Roland Cole, Community member
13.	Bureh Beach Surf Club	Abu Douglas Diaby, General Manager
14.	York Town	Julrick Pratt, Headman
15.	Innovation Hub	Morris Marrah, General Manager
16.	NGO- Rainbo Initiative	Daniel Kettor, Executive Director

Stakeholder consultation or engagement is a process and EDP PCU will continue with the engagement throughout the project implementation phase in collaboration with the implementing agencies as well as the respective District Councils. Table 13 below identifies the type of stakeholders, methods of consultation, and indicative time for holding these consultations. Stakeholder analysis will be updated throughout the project implementation and updated as appropriate.

Table 13: Summary Plan for Stakeholders to be consulted

Stakeholder type	Issues of consultation	Method of consultation	Indicative time for holding consultations
Implementing agencies	Project progress and implementation issues	Technical committee meetings	2 hours monthly
Other public agencies	Project activities and issues of concern e.g. gender, disabilities, environment	Meetings with members of technical committee	1 hour meeting on topic of concern
Village chiefs	Destination subprojects	Village meetings	3 hours monthly during sub project development
Private sector industry associations	Destination subprojects and training opportunities	Meetings with sub-project committee for tourism	2 hours quarterly
Private Incubators and accelerators	Information about calls for proposals, implementation issues	Meetings with association or identified organizations	90 min meeting at start of this component and during implementation as needed.
Institutions providing entrepreneurship training	Information about calls for proposals	Meetings with association or identified organizations	90 min meeting at start of this component and during implementation as needed.
NGO, CSO, CBO	GBV awareness and training, GBV service provision	Workshop, Focus group discussions	

9 CONCLUSION

The project will provide support to the GoSL's Economic Diversification Project which is targeting the tourism industry and SME development and growth. The proposed civil works may not impose significant environmental and social impacts. However, the minor to moderate as well as few major social impacts have been identified, and mitigation measures have been suggested to address undesired situations.

The responsibility for managing these mitigating measures have been described and the ultimate responsibility will rest on the Ministry of Finance which is the coordinating ministry and will host the Project Coordinating Unit (PCU). The current capacity to implement safeguard actions is low and this will be built under the Project. Key safeguard persons will be identified and trained from the respective participating institutions including the SMEDA and NTB. Appropriate persons will be trained in GBV and stationed in project communities to assist with the management of abuse cases.

10 REFERENCES

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World Bank (2018) Sierra Leone Agro- processing competitive project, IDA- PAD

Human Rights Defenders Network- Sierra Leone and the Global Initiative for Economic, Social and Cultural Rights (2014) Joint Parallel report to the UN Human Rights Committee

Weekes S, Bah, S (2017) Sierra Leone 2015 Population and Housing Census. Thematic Report on POPULATION STRUCTURE AND POPULATION DISTRIBUTION

ANNEXES

- Annex 1: Environmental and Social Screening Checklist
- Annex 2: EPA- SL Environmental Impact Assessment (EIA) licensing procedure
- Annex 3: Summary of discussions and concerns from Stakeholder consultations

ANNEX 1 - ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST

A	PROJECT NAME:			
1	Project Location (Province, District, Town)			
2	Safeguard officer filling Form			
3	Date of Screening			
B	DESCRIPTION OF ACTIVITY			
1	Type of Activity (including objectives and outputs)			
2	Land area to be taken by project activity, in ha			
3	Any existing property to be affected, and by how much (total, partial demolition etc.)			
4	Any plans for construction, movement of earth, changes in land cover			
5	Date of commencement and expected completion date and estimated cost			
C	PRELIMINARY ENVIRONMENTAL INFORMATION			
		YES	NO	COMMENT
1	Is there adjacent/nearby critical natural habitat?			
2	Are there activities at the project site?			
3	What is the current land use			
4	Will the proposed activities have any impact on any ecosystem services, biodiversity issues or natural habitats?			
5	Will there be restrictions or loss of access to public facilities or resources?			
6	Will there be restrictions or loss of access to public facilities or resources?			
7	Will there be water resource impacts?			
8	Will there be vegetation and soil impacts?			
9	Will the air quality or noise impacts?			
0	Are there any new or changing river basin management planning or activities?			
1	Any cultural heritage/sacred sites in project area?			
D	PRELIMINARY SOCIAL INFORMATION			
		YES	NO	COMMENT
1	Has there been litigation or complaints of any environmental nature directed against the proponent or subproject?			
2	Will the subproject require the acquisition of land?			
3	What is the status of the land holding required by the project (customary, lease, community lands, etc.)?			

4	Is there evidence of land tenure status of landowners and/or occupants (affidavit, other documentation)?			
5	Are there outstanding land disputes?			
6	Has there been proper consultation with stakeholders?			
7	Is there a grievance process identified for PAPs and is this easily accessible to these groups/individuals?			
8	Will there be any changes to livelihoods?			
9	What are the main issues associated with community benefits?			
0	Will any restoration or compensation be required with Affected persons?			
E	GENDER BASED VIOLENCE			
1	Any reported cases of GBV in the community			
2	When was the last reported case			
3	Is there any community support for survivors			
E	IMPACT IDENTIFICATION AND CLASSIFICATION			
		Choose L, M or H	COMMENT	
1	Natural habitats	LOW (No natural habitats present of any kind)		
		MEDIUM (No critical natural habitats; other natural habitats occur)		
		HIGH (Critical natural habitats present; within declared protected areas)		
2	Water Resources	LOW (Water flows exceed any existing demand; low intensity of water use; potential water use conflicts expected to be low; no potential water quality issues)		
		MEDIUM (Medium intensity of water use; multiple water users; water quality issues are important)		
		HIGH (Intensive water use; multiple water users; potential for conflicts is high; water quality issues are important)		
3	Natural hazards	LOW (Flat terrain; no potential stability/ erosion problems; no known flood risks)		
		MEDIUM (Medium slopes; some erosion potential; medium risks from floods)		
		HIGH (Mountainous terrain; steep slopes; unstable soils; high erosion potential; flood risks)		
4	Land tenure	LOW (No conflicts, disagreements around use of land)		
		MEDIUM (Process of land regularization and rights to natural resources being worked out with clear		

		communication and grievance process in place)		
		HIGH (Land conflicts historically unresolved, community/ persons being evicted, settlers losing rights and no transparency or grievance redress available)		
5	Gender Based Violence	LOW (No known case in the community		
		MEDIUM (Few cases but with adequate structures in place to assist survivors both legally and medically)		
		HIGH (Cases abound and no structures in place to assist survivors)		
F	SUMMARY OF SITE SENSITIVITY			
			Tick appropriately	Comment
	[A]	HIGH		
	[B]	MEDIUM		
	[C]	LOW		
G	IMPACT MITIGATION			
	Impact Identified			
	Mitigation options			
H	DETERMINATION OF ENVIRONMENTAL CATEGORY BASED ON SCREENING			
			Tick appropriately	COMMENT
	[A]	REQUIRES AN ESIA		
	[B]	REQUIRES PREPARATION OF ADDITIONAL E&S INFORMATION TO SUPPORT ESMF eg GBV, LIMP		
	[C]	DOES NOT REQUIRE FURTHER ENVIRONMENTAL OR SOCIAL DUE DILIGENCE – REFER TO ESMF		
	PREPARED BY:			
	DATE:			

ANNEX 2 - EPA- SL ENVIRONMENTAL IMPACT ASSESSMENT (EIA) LICENSING PROCEDURE



CHECKLIST FOR THE ISSUANCE OF ENVIRONMENTAL IMPACT ASSESSMENT (EIA) LICENCE FOR PROJECTS UNDER THE FIRST SCHEDULE OF THE ENVIRONMENT PROTECTION AGENCY ACT, 2010

The developer/proponent is the applicant who is required to undertake the following stages.

Stage One – Registration

1. The applicant is required to register the project proposal/undertaking through an application process. The letter is addressed to the Executive Chairperson and copied to the Director. This is to expedite the processing of the EIA application.
2. The Agency shall issued application and screening forms to the applicant after a payment of two hundred thousand Leones at an account designated for EIA's application fees.
3. The applicant is required to return duly completed forms together with the project proposal of the undertaking to the Environment Protection Agency Sierra Leone (EPA-SL) within fourteen days.
4. The Agency shall acknowledge receipt of the filled application and screening forms within seven days.

Stage Two – Screening

1. Project proposal, application and screening forms are screened to determine whether or not the development proposal should be subject to an EIA and, if so, the level of detail required.
2. After the screening, the report shall be communicated to the applicant within twenty one days from the date of receipt of the application and screening forms.

Stage Three – Scoping

1. After the project has been classified and a determination is made that the activity requires an environmental impact assessment license the proponent will be required to submit a scoping report on the project.
2. The scoping report shall set out the scope or extent of the environmental impact assessment to be carried out by the applicant and shall include a draft terms of reference which shall indicate the essential issues to be addressed in the environmental impact statement on the proposed/current undertaking.
3. The Agency shall upon receipt of a scoping report examine it and inform the applicant within twenty one days of the receipt of the report whether it is acceptable or not acceptable.
4. Staff of the Agency will visit the location of the project before the scoping report is accepted or not accepted by the Agency.

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

1. Upon approval of the scoping report and terms of reference the applicant undertakes the impact studies.
2. Before undertaking the environmental impact assessment, the applicant shall have the responsibility to:
 - Give notice of the proposal undertaking to the relevant ministries, government departments and organizations and the relevant local council;
 - Advertise in at least two national newspapers and a newspaper, of any circulating in the locality where the proposed undertaking is to be situated; and
 - Make available for inspection by the general public in the locality of the proposed undertaking, copies of the scoping report.
3. 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.

Stage Five – Public Hearing and Review of the ESHIA Report

1. The applicant shall hold two or more public hearing meetings in respect of the environmental impact statement (environmental impact assessment document) for public participation in the decision-making process.
2. The applicant should choose the date(s) and venue(s) of the public hearings.

3. The applicant should also choose to pay for the publication of dates and venues of the public disclosure in at least two national newspapers. The Agency has no objection to this.
4. The report will be gazetted and circulated to professional organizations for comments.
5. Depending on the location of the project the applicant will be required to make announcements over the media in the local languages.
6. Staff of the Agency will also visit the site or operational areas of the project to ascertain the components and content of the ESHIA Report in the review stage.
7. A draft environmental impact statement shall be reviewed by the Agency after receipt of recommendations following a public hearing.
8. 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.

Stage Six – Decision Making

1. This is the stage where the ESHIA report is approved or rejected.
2. The Board of the EPA is vested with the power to approve or reject an application for an EIA.
3. 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.
4. Failure to commence operation of the undertaking within the twelve months as provided in the EPA Act, 2008 as amended in 2010 shall render the EIA License invalid after the period.
5. When an application has been rejected by the EPA Board, the applicant has a right to seek legal redress.

Stage Seven – 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.

Note: EPA-SL should be involved through all these stages for guidance and compliance with the provisions of the EPA Act, 2008.

ANNEX 4 - SUMMARY OF DISCUSSIONS AND CONCERNS FROM STAKEHOLDER CONSULTATIONS

Stakeholder consultations from 28th to 31st May 2019

No	Organization comments/ concerns and suggestions
1.	<p>Ministry of Finance, Economic Policy and Research Unit Persons in attendance: Alimamy Bangura (Director), Date: 29 May 2019 Venue: Ministry of Finance. Freetown</p>
	<p>Highlights of discussion included the following:</p> <ul style="list-style-type: none"> • This is the coordinating center of the project and will play lead role after the request to expand the scope of the earlier project was discussed and agreed with the World Bank • An additional US\$20M has been requested to cater for the expanded scope • SMEs are recognized as backbone of any economy and the support is required to grow these enterprises which for this project will exclude mining related activities • The Solution center will be located foremost in Freetown and the second to be in one of the other Provincial areas which has not been selected yet. Appropriate and transparent criteria will be used to select the location of this second Center. • The infrastructure development will mainly encompass rehabilitation of buildings or construction of new ones • The project will among others pay attention to Gender issues. To the extent that it should consider provision of day care centers at Solution/ Incubation centers to encourage nursing mothers to be part of the program. • The roles of other implementing partners are acknowledged including the DSTI, SMEDA, NTB and their parent ministries. The organogram for the project is clear on institutional roles and responsibilities and also aide memoire prepared by the WB after previous visit on --- • Civil society groups and the private sector all identified as important stakeholders • The ministry is fully committed to the project and will ensure adequate time and attention paid to have a successful project.
2.	<p>SME Development Agency Persons in attendance: Sharka Sannoh (Director), Julius Kandeh- Kanu (Administrative Officer, Outreach & Public Education), Kalilu Kudi (Administrative officer, Programmes), James Karrow- Kamara (Finance Officer), Eileen West (Secretary) Date: 29 May 2019 Venue: SMEDA</p>

	<ul style="list-style-type: none"> • SMEDA was set up by an Act of Parliament in 2016. Hence, Agency is quite new as it began operations recently in 2017 • Main objective is to provide enabling environment for SMEs to thrive in the country. Functions include coordinating all SME activities in the country by setting up database, capacity building, facilitating access to market, etc • Staffing include 5 permanent staff and 6 volunteers • Current institutional interest in environmental and social sustainability matters exemplified in participation in Climate Change issues spearheaded by Meteorological Services under Ministry of Transport and Aviation. SMEDA represented by CEO. However, there is no formal procedure in place to ensure incorporation and implementation of safeguard in activities. • There is a database of about 7,000 SMEs but these are currently being screened to confirm status as active or dormant. • Some SMEs encountered include agribusinesses (poultry, farming), charcoal making, IT sector etc. Traders bringing in items from neighbouring Guinea are recognized as the largest group within the informal sector. • Programs aligned with state policies which has targeted empowerment of youth and women, About 60% of effort skewed towards gender. • Aware of various Innovation Hub centers in the country. Has written formally to these seeking cooperation • Other partners include SLECAD, National Commission of Social Action etc • Key challenges include lack of funding from central government, resource constraints (no vehicles, equipment, training facilities lacks furnishing,
3.	<p>SENSI TECH HUB</p> <p>Persons in attendance: Morris Marrah (General manager), Mark Charmer</p> <p>Date: 30 May 2019</p> <p>Venue: Sensi Tech Hub offices, Aberdeen, Freetown</p>
	<ul style="list-style-type: none"> • Has participated in some EDP preparatory meetings • Strong advocate on the need to fully engage the private sector especially for the design and activities of the Innovation Hubs • Sensi Hub since establishment in 2006 has supported young entrepreneurs giving them training and facilitating access to capital. It has 4 centers across the country and expects to be scaling up • Has received support from donor community including GIZ, CRS etc whom they also offer their services. • Competitors are few and may include Innovation Axis, Grow SL and some other youth groups with some support from the British Council
4.	<p>RAINBO INITIATIVE</p> <p>Persons in attendance: Daniel Kettor (Executive Director), Gibril Kargo (Deputy Executive Director)</p> <p>Date: 30 May 2019</p>


	Venue: Rainbo Initiative Offices, Aberdeen, Freetown
	<ul style="list-style-type: none"> • NGO operating nation- wide and with key interest and expertise in GBV • Interest stems from atrocities committed during civil war and therefore Abuse centers built after the war to provide support to survivors such as counselling and medical • Currently operating through three centers in Freetown, Kono and Kenema. Other centers coming up in Bo and Makeni and these are located in government hospitals. The Centers are staffed with midwives, counselors, para- legal persons and doctors. • Current data suggests about 10 to 15 rape cases committed daily country- wide • Activities include Counselling, Outreach programs in communities, schools, mosques, churches, Advocacy, Data gathering and management for GoSI and donor community • Has 37 full time staff with about 20 interns (volunteers) • Donor support from Irish Aid, UNFPA etc • Sole institution providing credible data on GBV cases to GoSL and donor community. Recent government policy directives have been influenced by information provided by Rainbo Initiative • Conversant with WB policies and expecting to sign MOU with the Bank for another project soon.
	WORLD BANK OFFICE- SIERRA LEONE Persons in attendance: Gloria Mahama, Alari Mahali Date: 29 May 2019 Venue: World Bank offices- Freetown
	<ul style="list-style-type: none"> • Updated report to be processed under the old PS hence new WB EMF format not required • Concerns about GBV at tourist sites to be addressed in the updated report • To include child labour/ trafficking and labour management issues • Documents available to facilitate reporting include Good Practice Notes and Action Plans on GBV • NGOs may be engaged to implement GBV mitigation plans which will include offering health, psychological and legal support and shelters for survivors (not victims) • There is a pending arrangement in the form of an MOU to use the services of the NGO, Rainbo Initiative under the WB funded Urban Transport Project • Even though girls and women are vulnerable in the tourism industry likewise women entrepreneurs may be exposed to harassment when power dynamics are at play • The SME incubation concept may entail offering training, coaching, technical assistance for existing enterprises or start- ups or even at the ideas stage • There are some good examples of local Incubation hubs such as Sensi Tech and Innovation SL. SMEDA is a government agency supporting SMEs even though their

	<p>current capacity is low and will require technical support</p> <ul style="list-style-type: none"> • The project should be concerned with environmental and social management issues to be presented by start-up companies when they are established. For example, use of plastics to mold construction blocks • Labour management issues to be mentioned in terms of procedures for engagement, grievance redress, discrimination, child labour etc • Project should explore opportunities for digitization especially for the GRM
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Stakeholder consultations from 14th to 17th May 2018

No	Organization/ Community/ Comments, Concerns and Suggestions
1	<p>Members of the SLSTD Project Preparation Committee</p> <p>Persons in attendance: Mohamed Jalloh (Director of Tourism, Ministry of Tourism), Fatmata Abe-Osajin (Deputy General Manager), Abdul S. Sanusi (Ministry of Transport and Aviation), Aram Kazandjor (Manager, Tacogama Sanctuary) and Mr. Umaru Woody (Planning and Development Manager).</p> <p>Date: 14 May 2018</p> <p>Venue: Tourist Board offices</p>
	<p>Highlights of the discussion included the following:</p> <ul style="list-style-type: none"> • No decision has been taken on the specific sites to benefit from the project • Tourism has been highlighted by the new government as a key economic development sector and opportunities must be fully exploited • Potential sites include beaches, such as Lakka, Kent, River no. 2; York Village (an old historical town with colonial buildings, caves etc); Banana Island (slave transport); Tecugama game reserve (Chimpanzee sanctuary) etc, • Facilities to be provided may include jetty at Kent to assist boat transport to Banana Island, construction of new facilities at beaches (sanitation, restaurants, reception etc), access roads etc • The proposed interventions will not relocate any persons or businesses • Beach areas are state property as per the Foreshore Act. This stretches up to 150m onshore. • It is appreciated that communities are providing services and operating various businesses at the sites to earn income. The project will seek to add value to the current community effort to make the sites more attractive for both local and international tourists. • A more structured relationship will be created with the Ministry to ensure that standards are satisfactory. • There are rivalries between youth and other groups within communities and the tourist board may mediate to forge unity. Most facilities are currently managed by


No	Organization/ Community/ Comments, Concerns and Suggestions
	<p>the Youth groups with some support from the local Head persons.</p> <ul style="list-style-type: none"> • The Board will encourage these groups to formalize their relationships and acquire legally binding documents on land and other properties they may have acquired • There is a strategic tourism development plan (2009- 2015) requiring updating • The Tourist Board currently promotes community involvement in tourism but as the industry expands, more serious direct investment will be required which may be beyond the capacity of the communities. Partnerships may be required with foreign/ local investors. • The communities may be sensitized to be ready for such interventions and be made to understand that they stand to gain more when in partnerships than alone. However, any such partnership arrangements should be very well negotiated and documented to avoid litigations later • The Monuments and Relics Commission is responsible for national edifices and any such buildings • The National Protected Areas Authority manages about 5 or 6 main protection areas in the country including the Tecguma sanctuary for chimpanzees but which is under MAFFS. There is very little financial support from the Ministry.
	
2	<p>Ministry of Works, Housing and Infrastructure</p> <p>Persons Consulted Abu Bakarr Jalloh (Director of housing), Alphasor Bah (Senior Quantity Surveyor Assistant), Ajah Fillie- Faboe (Chief Building Inspector), Tamba P.</p>


No	Organization/ Community/ Comments, Concerns and Suggestions
	<p>Ngegba (Senior Building Inspector).</p> <p>Date: 14 May 2018</p> <p>Venue: Housing Department offices</p>
	<ul style="list-style-type: none"> • There has been a recent ministry rearrangement with the advent of the new government to create: (1) Ministry of Lands, Housing and Environment (MLHE) and (2) Ministry of Works and Public Assets (MWPA) • The Housing and Survey Departments were two critical divisions under the erstwhile Ministry of Works, Housing and Infrastructure. The Housing Department has now been transferred to MLHE while the Survey Department remains with the MWPA. • The Housing Department by their mandate, provides valuation services in respect of land for the government while the Survey Department provides similar services for structures (buildings). There is also consideration for compensation for livelihood losses and disturbance • Assistance may be sought from consultants when required. • There is no professional certification program in Sierra Leone for quantity surveyors and they are usually affiliated to the engineering body • There are currently no standard national rates and values are generated from basics using appropriate and recognized methods • There is a redress mechanism in place which involves recourse to the Legal Aid Board for those requiring legal assistance • The erstwhile Ministry of Works, Housing and Infrastructure was responsible for granting building permits throughout the country.
	


No	Organization/ Community/ Comments, Concerns and Suggestions
3	National Tourist Board Person Consulted Mr. Yassin Kargbo (General Manager) Date: 15 May 2018 Venue: Tourist Board offices
	<ul style="list-style-type: none"> • The Board is responsible for marketing and promotion of tourism and provides classification (licensing and certification) as well as quality control • The Board is eager to expose international visitors to tourist attractions immediately on arrival at the airport and is working with stakeholders to display these attractions at vantage places for maximum impact. This includes video shows during sea crossings from Lungi to Freetown • The Board is working with various NGOs (such as Assets?) to support community management of tourist sites especially the beaches. • There is also collaboration with the National Protected Area Authority (NPAA) for eco- tourism projects in forest and game reserves • Challenges include accessibility to sites, sanitation and security and the quality of facilities at these sites. • Communities must be trained to be professional and to operate facilities using appropriate business models to ensure sustainability • Communities are usually suspicious about the intention of investors and not very excited about partnerships. They will require sensitization and training programmes to be more receptive to such opportunities. • Key challenges at tourist sites include sanitation, encroachment and illegal structures scattered along beaches as well as access roads • The Board plans to involve all stakeholders to develop the sector especially hoteliers to construct facilities at tourist areas and offer reasonable packages to both local and international visitors.


No	Organization/ Community/ Comments, Concerns and Suggestions
	
4	<p>Tacugama Chimpanzee Sanctuary Person Consulted - Aram Kazandjar, Manager Date: 15 May 2018 Venue: Tacugama</p>
	<ul style="list-style-type: none"> • The Sanctuary is an autonomous institution founded in 1995 and currently under the Wildlife department of the Forestry Ministry • Does not receive any funding from the government to operate the facility. Relies on corporate sponsorship and the donor community. Proud of the 100% renewal rate with sponsors. • Sanctuary has 32 local staff (maintenance, cooks, drivers, tour guides, rangers); and 4 permanent international staff (founder/ director, manager, vet, conservation) • Recovers captured baby chimps from homes where they are usually kept as pets. These are then treated and released into the wild after going through quarantine and acclimatization processes • Activities at the Sanctuary handicapped by many challenges in addition to funding. These include power supply, cost of feeding chimps, vehicles not dependable etc. Illegal logging is rampant in the reserve • Current facilities include six eco- lodges for about 18 persons at a time at about US\$90 per night. There is need to diversify products to include bird watching, hiking, massages, yoga etc. • There is limited research facilities on site and would require provision of an educational resource centre to have at least 50 seats, library etc. to attract researchers, volunteers


No	Organization/ Community/ Comments, Concerns and Suggestions
	<ul style="list-style-type: none"> • Power supply could be augmented by solar system during the dry hot months and harnessing of local stream for hydropower generation during the wet rainy months • Good relationship with surrounding communities including with the head men/ women. Supports communities to organise football games and clean up exercises. • Has an MOU with about 14 communities to visit sanctuary and observe activities. Five chiefs spent some time in the sanctuary recently. <div data-bbox="376 478 1904 1054">  </div>

No	Organization/ Community/ Comments, Concerns and Suggestions
	
5	<p>Charlotte Community/ Local community close to Tecugama Sanctuary</p> <p>Person Consulted Catherine Harding, Head woman and Akibola Taylor Hakun Farmer/works as porter for Charlotte community clinic.</p> <p>Date: 15 May 2018</p> <p>Venue: Charlotte village</p>
	<ul style="list-style-type: none"> • This is one of the communities surrounding the Tecugama sanctuary. It was established in 1818 and currently has about 300 residents. • Water supply is mainly from the stream and there is one borehole. • There is no electricity even though the community is close to a mini hydropower dam. • There is a primary school in the community but after their primary education, the children have to go to the next community (Regent) to further their education. • There is no public toilet. The school, hospital and some individuals have toilet facilities. • The main occupation of the people of Charlotte community is farming but some people are into livestock (pig/goat) and others do stone mining (people from Freetown come to buy). • Prior to the formation of the Tacugama Chimpanzee Sanctuary, some of the community members used to hunt, others used to go there for fuel wood/ wood cutting and finally farming. • The Head woman was emphatic that there is very little contact with the managers of the Sanctuary and therefore enjoying no benefits from the facility




No	Organization/ Community/ Comments, Concerns and Suggestions
	<ul style="list-style-type: none"> • The community was supplying mangoes to the Tacugama Sanctuary but had to stop because they were not paying. • The community is unhappy because a resource centre to be sited in their community was relocated to Tecugama. • They do not have any land ownership issues with Tecugama • Two members of their community worked as volunteers at Tecugama but quit after 3 weeks because they were not being paid. They also think working with chimpanzees is a risky job as there has been a fatality before. • The community will be pleased to receive support such as public toilet, boreholes and community centre (meeting place) from the Sanctuary. 
6	<p>Lakka Beach</p> <p>Person Consulted Tommy Douglas, Land/Business Owner.</p> <p>Date: 16 May 2018</p> <p>Venue: Lakka beach</p>
	<ul style="list-style-type: none"> • Sand winning within the Peninsular is a big threat to the beaches • Generally, aware that the beach statutorily belongs to the state. Onshore beyond the beach, land belongs to the Lakka people and managed/ administered through the Headman. • Numerous eating places dotted along the beach including the island which are owned by both locals and foreigners. • Most of the developments are individually owned and therefore no community managed facilities are found on the beach • Currently, the community is not very united and this is hampering growth and development of Lakka. The headman will need to address these issues to build his community


No	Organization/ Community/ Comments, Concerns and Suggestions
	<ul style="list-style-type: none"> • Land has been handed down from generation to another and documentation is poor. • Some families have sold land to foreigners for development/ investment • Most of the visitors to the beach are locals with few foreigners 
7	River No. 2 Beach Persons Consulted Daniel Macauley, Victor Harding, Yusufu O. Dumbuya, Theophilus Mansuray Date: 16 May 2018 Venue: River no. 2 Beach
	<ul style="list-style-type: none"> • River No 2 is a community of about 1,000 inhabitants. Basic amenities include gravity system for water supply, power supply from generating set, basic sanitation facilities etc. There is no local school however. • The Youth Development Association was founded in 1996 with primary aim of developing the beach to attract tourists and earn income for themselves and the


No	Organization/ Community/ Comments, Concerns and Suggestions
	<p>community. Most community members are also fishermen</p> <ul style="list-style-type: none"> • The Association has adopted the slogan Sankofa meaning it is always wise to learn from the past • There is a constitution drawn to guide their activities and executives are elected. Currently, there are 40 members including 7 women. To qualify for membership, you have to be a member of the community and pay registration and monthly membership dues. It is being run like a welfare society with benefits such as support for medical expenses, marriage, bereavement etc • Tourists pay Le5,000 per visit which is split in 3 ways. Le3,000 to the association; Le1,000 to management; and Le1,000 to the community • Management comprises the executives, and managers responsible for guest house, bar, kitchen, restaurant, purchasing, security and maintenance • Currently own 12 room guest house, power generating set, restaurant etc. There is need to improve accommodation, and acquire kitchen appliances and other facilities; and are planning to construct conference hall and provide excursions to Banana island, forest hikes etc. They however require professional training • They have had limited support from the Tourist Board in marketing and training • There has been external support from Norwegian Refugee Council for power supply • The community is in full support of the project which at peak times may involve 50 to 60 community volunteers • The police assists with security during busy days • Planning towards legal registration of facilities including land to forestall any future ownership problems <div data-bbox="611 807 1686 1216">  </div>

No	Organization/ Community/ Comments, Concerns and Suggestions
8	<p>Levuma Beach</p> <p>Persons Consulted Alhaji M. Bangura, Jane Turay, Santigie Kargbo, Soltigu Nwany, Osman Conteh Niah, Daniel Washington, Mohamed Kpaka, Amil Kamara, Sania Johnson.</p> <p>Date: 16 May 2018</p> <p>Venue: Levuma beach</p>
	<ul style="list-style-type: none"> • This is perceived as a community beach to be run efficiently to the benefit of the residents and all visitors • Procedures for acquisition of land for development have not been properly streamlined between community and the Tourist Board. The communities do not own the beaches but are major stakeholders in managing the sites and therefore do exert some influence. • There is a community management association duly constituted with the support of the community elders. • Lately, rival groups have emerged and there is ongoing effort to reconcile differences and forge ahead with the development of the beaches and ultimately the town. These groups include Levuma Network for Peace and Development, Portoo Levuma Beach Association; and Portoo Levuma Beach Base Organization. <div data-bbox="241 699 1341 1114">  </div>
9	<p>Banana Island</p> <p>Persons Consulted Eric Thompson Deputy Head man, Roland Cole Community member.</p> <p>Date: 17 May 2018</p> <p>Venue: Banana Island</p>

No	Organization/ Community/ Comments, Concerns and Suggestions
	<ul style="list-style-type: none"> • The Dublin island is one of the four Banana islands with about 250 inhabitants and it is accessed by boat ride usually from Kent. • It used to be the transit point for slaves on their journey away from the continent and later as home for the returned slaves • Some tourist attractions include the remnants of slave fort and cannons for defense of the slave masters' merchandise. There are old water points, church buildings etc • On their return to Africa, the slaves were shipped to the island and each family was allocated 2 town plots for settlement and some more land for farming. Land has since been handed down from generation to generation • Currently, the inhabitants are mostly farmers and fishermen. The youth seem idle with little interest in these occupations • Interest in tourism began about 10 years ago with the construction of some guest facilities. The guest house is currently abandoned because of a misunderstanding between the investor and the community members over profit sharing. • Current social amenities on the island include: a primary school, clinic with 2 medical staff (nurses), 3 wells (the first well was dug in 1802 and still functional), household pit latrines, a church (church of England), etc • The island has not been zoned for development and there is fear that development may become haphazard and wasteful for the land resources available. Unfortunately, land has not been surveyed in recent times to confirm land sizes and to aid development planning. • There are local taboos such as no fishing and other economic activities on Sundays. There is unwritten rule for community members to attend church and be nicely dressed during the day • There is a secret society (hunting society) which holds sacred allegiance to a demarcated section of the forest. Non- members are not allowed at any time to this part of the forest. The society members visit annually to perform rituals • Cemetery is also kept sacred and rituals are performed annually when food is cooked and left there to 'feed' ancestors

No	Organization/ Community/ Comments, Concerns and Suggestions
	  
10	<p>Bureh Beach</p> <p>Person Consulted Abu Douglas Diaby, General Manager</p> <p>Date: 17 May 2018</p> <p>Venue: Bureh town</p>
	<ul style="list-style-type: none"> • The Bureh Beach Surf Club is the major group managing the beach to attract tourists • This is a youth group recognized by the town with current membership of about 13 persons including one female surfer. • The group has a formal arrangement with the town which includes documentation to confirm ownership of land and facilities • They were assisted by an NGO, Welthungerhilfe (WHH) with a kitchen, 5 surfing boards. They have used their resources to provide accommodation of about six rooms for guests. Some support from individuals and groups after their visits • Initially arrangement was to give 50% of revenue to workers, 25% to maintain equipment and the final 25% to the community. However, due to low revenue, payment to the community has been suspended. • The Club members usually meet on Mondays to plan and take decisions on their operations • The Club is run by a constitution with some bye- laws. Elections for executive positions are held annually. • Currently working on opening a bank account for better financial management

No	Organization/ Community/ Comments, Concerns and Suggestions
	<ul style="list-style-type: none"> • Would welcome investors but will maintain majority ownership and involvement in the management of facilities • Urgently require better accommodation facilities to attract more visitors for overnight or long stay 
11	York Town Person Consulted Julrick Pratt, Headman Date: 17 May 2018 Venue: York town
	<ul style="list-style-type: none"> • York is a well established and nicely planned old town celebrating its centenary this year. • Current population is in the region of about 1,200 persons • The unique black sand beach is community managed. There is also an island close to the beach. which is uninhabited but may contain some interesting wildlife including flora. • There are no land ownership challenges • The main occupation of the community is fishing and the women are usually fishmongers. The youth are responsible for keeping the beaches clean and periodic planting of trees for shade • Power supply is from generating sets and water is by gravity system from a dam

No	Organization/ Community/ Comments, Concerns and Suggestions
	<ul style="list-style-type: none"> • There are several monuments in York such as old accommodation used by the King of England, numerous colonial items such as church bells, lamp posts etc. Most of the monuments are deteriorating. The first secondary school in the peninsular can be found in York. There is no support from the government to maintain these monuments and relics. • The town can also boast of a cave which is suggested to be more than 2 miles long but is currently structurally unsafe to explore. • Visitors include school children who come on educational tours. <div data-bbox="383 466 1935 858">  </div>