**Republic of Sierra Leone**



**Productive Social Safety Net and Youth Employment Project- Original Financing (P176789) and First Additional Financing (P180035)**

**Negotiated**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

**May 24, 2023**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Government of Sierra Leone (the Recipient) is implementing the Productive Social Safety Net and Youth Employment Project (the Project), with the involvement of the National Commission for Social Action (NaCSA), Ministry of Youth Affairs (MoYA), National Youth Commission (NaYCOM), Local Councils, Anti-corruption Commission (ACC) and Statistics Sierra Leone (Stats SL), as set out in the Financing Agreement for the Project. The International Development Association (the Association) has agreed to provide Original Financing (P176789) as set out in the Financing Agreement for the Project. The Association, acting as the administrator of the Global Risk Financing Facility, has also agreed to provide an additional financing (P180035) to the Project, as set out in the GRIF TF Grant Agreement. This Environmental and Social Commitment Plan (ESCP) supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this ESCP, in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement, and GRIF TF Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient represented by NaCSA and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient, represented by the Commissioner of NaCSA. The Recipient shall promptly disclose the updated ESCP.

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| **MATERIAL MEASURES AND ACTIONS** | | **TIMEFRAME** | **RESPONSIBLE ENTITY** |
| **MONITORING AND REPORTING** | | | |
| A | **REGULAR REPORTING**  The Recipient through National Commission for Social Action (NaCSA) shall prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities and functioning of the grievance mechanism(s). | Quarterly throughout project implementation | NaCSA |
| B | **INCIDENTS AND ACCIDENTS**  The Recipient through NaCSA shall promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including, inter alia, community agitation, death due to injury at site or harm and incidents such as fire injuries, physical violence, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), communicable diseases and infections etc.  Provide sufficient detail regarding the incident or accident (scope, severity and possible causes), indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate.  Subsequently, as per the Association’s request, prepare a report on the incident or  accident and propose any measures to prevent its recurrence. | Notification to the Association shall take place within 48 hours of becoming aware of the incident or accident.  Any severe injury (requiring off-site medical care), SEA/SH, or fatal incident shall be reported to the Association within 24 hours.  As soon as reasonably practicable, but no later than twenty (20) days after learning of such incident or accident (unless a different timeframe is agreed with the Association), provide the Association with the Root Cause Analysis (RCA) report that includes a detailed description of the incident or accident, and the measures, if any, that the Recipient has taken or plans to take to address it and to prevent any future similar event.  The notification/reporting system shall remain in place throughout Project implementation. | NaCSA |

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| C | **CONTRACTORS’ MONTHLY REPORTS**  Contract for works shall use the Bank’s standard procurement documents. Contractors and supervising entities shall be required to provide monthly monitoring reports on the ESHS performance, including an E&S report, to NaCSA. These reports shall also be submitted to the Association upon request. | Require contractors to submit monthly reports to NaCSA, which shall then be submitted to the Association quarterly and upon request. | NACSA |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** | | | |
| 1.1 | **ORGANIZATIONAL STRUCTURE**  The Recipient shall ensure that NaCSA establishes and maintains an organizational structure with qualified staff and resources to support management of E&S risks including an Environmental Specialist and a Social Development Specialist (SDS) all with qualifications and experience acceptable to the Association.  Environmental Specialist shall work with the Country’s National Disaster Management Agency (NDMA) to facilitate earlier and more reliable response and recovery to climate and disaster shocks, and over time. This will be done through prompt declaration of a national or a local emergency or issuance of an order or directive after an emergency; and the updating of the Emergency Response Manual (ERM) by the government through NaCSA and the National Social Protection Secretariat to adapt to the nature of the emergency.  The environmental specialist will provide support to Environmental risk management for the labor-intensive public works and he/she will support environmental risk management of AF activities which includes digital public works (DPW) program, while the Social Development Specialist maintains oversight on social risk management including SEA/SH mitigation. These Specialists shall be supported by an Environmental and Social Officer (ESO) from the Local Councils.  NACSA may also hire external expertise and consultancy services, where necessary, with terms of references acceptable to the Association. The consultant shall assist in preparing ESIA, ESMP and RAP (as necessary) during implementation when sites for subproject activities are identified.  NaCSA shall be responsible for management, implementation and coordination of the Project activities in coordination with the Ministry of Youth Affairs (MoYA), National Youth Commission (NAYCOM), Local Councils, and the Anti-Corruption Commission (ACC). | The Environmental Specialist and Social Development Specialist have been recruited already. The organizational structure, including the specialists, shall be maintained throughout Project implementation.  ESO from Local Councils shall be recruited/appointed not later than three months after effective date.  The consultant shall be hired to prepare ESIA, ESMP and RAP (as necessary) during implementation. | NaCSA  NACSA |
| 1.2 | **ENVIRONMENTAL AND SOCIAL INSTRUMENTS**   1. The Recipient through NaCSA shall update, disclose, consult upon, adopt, and implement, the Environmental and Social Management Framework (ESMF) including the Labour Management Procedures (LMP) prepared for the Project, consistent with ESSs and in a manner acceptable to the Association. 2. The Resettlement Policy Framework (RPF) and updated Stakeholder Engagement Plan (SEP) of the parent Project are adequate for the AF. The updated SEP has been redisclosed prior to appraisal. 3. Prepare and update as relevant, disclose, consult upon, adopt and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for infrastructure/works under component 2 of the Project for which the ESIA and or ESMP is required, consistent with the relevant ESSs. 4. Cause contractors to prepare, disclose, consult upon, adopt and implement Contractor’s Environmental and Social Management Plan (ESMP), as set out in the ESMF. | 1. The ESMF (including an LMP) for the parent project was prepared and disclosed in December 2022.      1. The ESMF shall be updated for the AF and redisclosed 3 months after Effective Date. The Recipient shall implement the updated ESMF, the updated SEP and RPF throughout Project implementation. 2. Prepare and update as relevant, disclose, consult upon, adopt an ESIA and or ESMP prior to initiation of the relevant construction activities under component 2, and thereafter implement the ESIA and ESMP throughout Project implementation. 3. Cause contractors to prepare, disclose, consult upon, adopt the Contractor ESMP prior to the carrying out of a subproject that requires the adoption of such C- ESMP. Once adopted, cause contractors to implement the respective C-ESMP throughout Project implementation. | NaCSA |

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| 1.3 | **MANAGEMENT OF CONTRACTORS**  The Recipient through NaCSA, in collaboration with the implementing agencies shall manage and supervise contractors and subcontractors to ensure their compliance with the ESSs and the terms of this ESCP, including by integrating ESHS specifications into procurement documents and contracts and ensuring compliance with their implementation thereafter. These ESHS specifications shall include but not be limited to:   * Codes of conduct (CoC) for contractors and subcontractors and their workers to prohibit SEA/SH and training of workers on their obligations under the CoC * Contractor to prepare a costed SEA/SH Action Plan as part of the contractor ESMP * Preparation of a contractor ESMP that is costed, with sufficient budget to mitigate E&S risks * Contractor shall also include site specific OHS and training of workers in the ESMP * Monitor Contractor commitment and compliance * Ensure contractors provide details on contractor’s oversight on ESHS performance | The relevant ESHS measures shall be incorporated as part of the preparation of the procurement documents and contracts before launching the procurement process for the relevant activities and shall thereafter be complied with throughout the carrying out of such activities.  Supervise contractors throughout Project implementation. | NaCSA |
| 1.4 | **TECHNICAL ASSISTANCE**  Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities when they become necessary during Project implementation are carried out in accordance with terms of reference acceptable to the Association, that incorporate the relevant requirements of the ESSs.  Ensure that any outputs from the technical assistance activities are consistent with the ESSs. | Throughout Project implementation  ESIA, ESMP and RAP (as necessary) will be prepared and disclosed prior to implementing relevant subproject activities. Technical documents such as engineering designs or feasibility related documents will be finalized at the implementation stage, prior to field  works. | NaCSA |
| 1.5 | **CONTINGENT EMERGENCY RESPONSE FINANCING**   1. Ensure that the Emergency Response Manual (ER Manual) includes a description of the ESHS assessment and management arrangements for the implementation of the SSN Cash Transfers and Economic Inclusion Support Part 1.3 and Contingent Emergency Response Component Part 5, in accordance with the ESSs. 2. Prepare, disclose, consult and adopt any environmental and social (E&S) management plans or instruments which may be required for activities under the SSN Cash Transfers and Economic Inclusion Support Part 1.3 and Contingent Emergency Response Component Part 5 of the Project, in accordance with the ER Manual and the ESSs, and thereafter implement the measures and actions required under said E&S management plans or instruments, within the timeframes specified in said E&S management plans or instruments. | 1. The adoption of the ER Manual in form and substance acceptable to the Bank is a withdrawal condition under Section III of Schedule 2 of the Financing Agreement for the Project. 2. The E&S management plans or instruments shall be prepared, disclosed, consulted, and thereafter adopted before the carrying out of the relevant Project activities under the SSN Cash Transfers and Economic Inclusion Support (Part 1.3) and Contingent Emergency Response Component (Part 5). The E&S management plans or instruments shall be implemented in accordance with their terms, throughout Project implementation. | NaCSA |

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| **ESS 2: LABOR AND WORKING CONDITIONS** | | | |
| 2.1 | **LABOR MANAGEMENT PROCEDURES**  The Recipient through NaCSA shall update, redisclose, and implement the updated Labor Management Procedures (LMP) that have been developed for the Project as part of updated ESMF, and that includes provisions for direct, contracted, and community workers, all consistent with ESS2.  The updated LMP shall be incorporated in the ESHS specifications of the procurement documents and contracts with contractors with requirements for contractors to prepare, adopt, and implement labor management plans as part of their Contractor ESMP, which shall, among others, cover Occupational Health and Safety (OHS) related issues and COVID-19 prevention strategies. The Recipient shall ensure that contractors comply with these requirements of their respective contracts.  The project will adopt and implement human resources policies and procedures appropriate to its size and workforce applicable requirements for contractors, subcontractors, and supervising firms, consistent with the Project LMP and ESS2 requirements. | An LMP was prepared and disclosed as part of the ESMF of the parent project Financing (December 20, 2021). It shall be updated and redisclosed as part of the updated ESMF as relevant, and it shall be adopted and implemented throughout Project implementation  The LMP requirements shall be incorporated into the procurement documents before launching the procurement process for the relevant Project activities. These requirements shall be reflected in the Contractor ESMP before the carrying out of the relevant Project activities and shall thereafter be complied with throughout the carrying out of such activities. | NaCSA |
| 2.2 | **GRIEVANCE MECHANISM FOR PROJECT WORKERS**  Establish, maintain, and operate a grievance mechanism for Project workers, as described in the updated LMP and consistent with ESS2.  Contractors and/or subcontractors shall also maintain and operate the Project grievance mechanism for Project workers, as described in the updated LMP and consistent with ESS2. | Grievance mechanism for workers become operational prior to engaging Project workers and maintained throughout Project implementation. | NaCSA |
| 2.3 | **OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES**  The Recipient through NaCSA in collaboration with Implementing Agencies shall adopt, and implement occupational, health and safety (OHS) measures specified in the updated ESMF and C-ESMPs.  Contractors working on the Project shall abide by the approved OHS measures. The OHS measures shall include COVID-19 prevention and response measures.  Project ESS Specialists shall train Contractor workers on various aspects of OHS relevant to the Project on a regular basis. | Prior to commencement of construction activities and shall be implemented throughout Project life. | NaCSA |
| 2.4 | **EMERGENCY PREPAREDNESS AND RESPONSE**  The Recipient through NaCSA shall, as part of the OHS measures specified above in 2.3, institute measures on Emergency Preparedness and Response, and ensure effective coordination with measures under 4.5., including ensuring that Project workers and contractors are trained on emergency preparedness and response and the implementation the relevant plan. | Prior to initiation of subprojects involving construction.  Maintained throughout Project implementation | NaCSA |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** | | | |
| 3.1 | **WASTE MANAGEMENT PLAN**  The Recipient through NaCSA shall engage the Environmental Protection Agency throughout the implementation of the Project for the management of all hazardous waste. | Throughout project implementation | NaCSA |
| 3.2 | **RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**  Resource efficiency and pollution prevention and management measures are covered under the updated ESMF. Specific measures shall be included in the ESMPs and C-ESMPs to be prepared before commencement of any civil work, consistent with ESS6.  Include, in each contractor contract, a requirement to restore any newly created borrow pits for feeder road rehabilitation activities.  Communities implementing agriculture subprojects shall receive extension support from the Ministry of Agriculture Forestry and Food Security (MAFFS) on best practices  including prevention of pollution, and use of organic fertilizers. | Throughout project implementation | NaCSA |
| **ESS 4: COMMUNITY HEALTH AND SAFETY** | | | |
| 4.1 | **TRAFFIC AND ROAD SAFETY**  Implement traffic and road safety measures in the Project updated ESMF consistent with ESS4. Project contractors shall be required to implement measures and actions in the updated ESMF/ESMPs/technical specifications C-ESMP to assess and manage traffic and  road safety risks as required. | Prior to the carrying out of the relevant subproject activities and maintained throughout Project implementation | NaCSA |
| 4.2 | **COMMUNITY HEALTH AND SAFETY**  The Recipient through NaCSA shall adopt and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, behavior of Project workers, risks of SEA/SH, potential for community exposure to communicable diseases including COVID-19 infection. These measures shall be considered in any ESMP, in accordance with the updated ESMF and ESS4, in a manner acceptable to the Association. COVID Protocols shall be included in any ESMP of the Project. The ESMPs shall include Facility Management Plans to be implemented by the districts to manage the facilities. | Measures adopted as part of ESMPs prior to commencement of field works, and implemented throughout Project implementation  ESMPs shall be submitted to the Association for approval before commencement of field activities. Once approved, the Protocol shall be implemented throughout Project implementation. | NaCSA |
| 4.3 | **SEA AND SH RISKS**  The Recipient through NaCSA shall in relation with Implementing partners prepare, adopt, and implement a stand-alone Gender-Based Violence (GBV) Action Plan, to assess and manage the risks of GBV and sexual exploitation and abuse (SEA) and Sexual Harassment (SH). The Plan shall incorporate measures and actions, consistent with ESS4 and in a manner acceptable to the Association, including relating to Project workers’ conduct and shall be extended to contractors and subcontractors of subprojects.  GBV Action Plan shall be required by the contractor as part of C-ESMP with adequate funding for implementation. | Finalize the GBV Action Plan for the Association’s approval 1 month after Effective Date of Additional Financing. After Effective Date, the GBV Action Plan shall be part of Project ESMPs and implemented throughout Project implementation.  Monitoring of contractor compliance  with GBV Action Plan quarterly throughout Project implementation | NaCSA  NaCSA |
| 4.4 | **SECURITY MANAGEMENT**  Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.  The Project may engage security personnel during Project implementation especially on crowd control during emergency interventions and youth employment support. The Project has prepared and disclosed a Security Management Plan which will be adopted during project implementation. | Throughout Project implementation  The Security Management Plan shall be adopted prior to engaging security personnel and implemented throughout Project implementation. | NaCSA |
| **ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT** | | | |
| 5.1 | **RESETTLEMENT POLICY FRAMEWORK**  The Recipient through NaCSA shall adopt and implement the Resettlement Policy Framework developed and disclosed by the Project. | Throughout Project implementation. | NaCSA |
| 5.2 | **RESETTLEMENT PLANS**  The Recipient through NaCSA shall prepare, disclose, consult upon, adopt, and implement resettlement action plans (RAPs) where applicable in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework that has been prepared for the Project, and thereafter adopt and implement the respective RAPs before carrying out the associated activities, in a manner acceptable to the Association. | Throughout Project implementation. RAPs shall be submitted for the  Association’s approval and once approved, implemented prior to commencing Project activities that involve land acquisition and involuntary resettlement, including ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable displaced people have been resettled and moving allowances have been  provided. | NaCSA |
| 5.3 | **GRIEVANCE MECHANISM**  The grievance mechanism to address resettlement-related complaints is described in the RPF and in SEP and shall be stated in RAPs. The Project will leverage the existing Social Safety Nets project’s GRM systems that is already in place and the Grievance Redress Committees (GRCs) shall include women and persons with disability in their respective committee. All project- related grievances will be managed by the established GRM system managed by the Anti-Corruption Commission. | Existing GRM in place and shall be maintained throughout RAP implementation and Project implementation | NaCSA |
| **ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES** | | | |
| 6.1 | **BIODIVERSITY RISKS AND IMPACTS**  Avoid adverse impacts on biodiversity and habitats during project activities. Where avoidance of such impacts is not possible, adopt and implement measures and actions for biodiversity impact mitigation as required in the ESMF and ESMPs, consistent with ESS6 and in a manner acceptable to the Association. | Measures will be identified in the ESMF and site specific ESMPs and implemented and monitored throughout Project implementation | NaCSA |
| **ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES** | | | |
| This standard is not relevant to the Project | | | |
| **ESS 8: CULTURAL HERITAGE** | | | |

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| 8.2 | **CHANCE FINDS**  The Recipient through NaCSA in collaboration with MoYA, NaYCOM, and Local Councils shall adopt and implement the Chance Finds procedure described in the ESMF/ESMPs developed for the Project. In the event of a find or the observation of a cultural practice, the Project shall follow the guidelines detailed in the ESMF/ESMPs and contact the Monuments and Relics Commission (MRC) that is entrusted with the protection of  cultural heritage in Sierra Leone within 72 hours of the find. | Chance Find Procedure covered under ESMF/ESMPs in accordance with the timeframes specified for the ESMF/ESMPs. Thereafter implemented throughout project implementation | NaCSA |
| **ESS 9: FINANCIAL INTERMEDIARIES** | | | |
| This standard is not relevant | | | |
| **ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE** | | | |
| 10.1 | **STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION**  Update, adopt and implement the Stakeholder Engagement Plan (SEP) prepared for the Project and its Additional Financing consistent with ESS10, which includes measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation in a manner satisfactory to the Association.  Regularly monitor and track the SEP implementation under the project. | The SEP of the parent project has been updated for the AF and redisclosed prior to project appraisal. The SEP shall be implemented throughout Project implementation.  Throughout project implementation | NaCSA |
| 10.2 | **PROJECT GRIEVANCE MECHANISM**  Recipient through NaCSA shall maintain and operate the existing Social Safety Nets project (P143588) GRM systems, as described in the updated SEP and updated ESMF. The Project GRM shall receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The Grievance Redress Committees (GRCs) shall include women and persons with disability in their respective committees.  The grievance mechanism shall also receive, register, and address concerns and grievances related to SEA/SH in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers. | GRM is functional and shall be maintained throughout Project implementation | NaCSA |
| **CAPACITY SUPPORT** | | | |

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| CS1 | **PROJECT WORKERS TRAINING**  The Recipient through NaCSA in collaboration with Local Councils, MoYA and NaYCOM will implement training programs for Project workers to improve awareness of environmental and social risks of the Project and to mitigate impacts on local communities, as defined in the updated LMP, updated ESMF/ESMPs and GBV action plan, and C-ESMP. | Trainings to start within one month of the recruitment of the Environmental Specialist, with bi-annual refresher trainings thereafter throughout Project implementation. | NaCSA |
| CS2 | **TRAININGS TO BE PROVIDED**  The Recipient through NaCSA shall ensure that relevant project actors and partners (PIU staff, Desk officers and Community Development Officers, Works Engineers, Contractors, and their Supervisors), and community levels (Facility Management Committee members) are trained in the following areas:   * Training on the ESF for project E&S specialists and key staff * The project’s GRM * Community Mobilization * Stakeholder mapping and engagement * E&S requirements (impacts and mitigation measures) of sub-projects * Training on guidelines and procedures particularly on E&S/ESMF/ESMP implementation * Training on relevant WHO COVID-19 Guidelines and GoSL COVID-19 Standard Operating Procedures and other guidelines * Subproject Environmental and Social screening * Occupational Health and Safety including emergency prevention * Emergency prevention, preparedness, and response arrangement * SEA/SH Risk Mitigation and Code of conduct * Site specific OHS * Disability inclusion training * Waste management, reuse, recycling, and minimization * E&S Documentation, monitoring and reporting   The PIU, project-related staff and consultants shall take part in training provided by WB on the ESF and related policies. | **Target Groups and Timeframe for Delivery**  This will be done before commencement of civil works, and periodic re-trainings throughout implementation, as needed | NaCSA |