Republic of Sierra Leone



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

Additional Financing (P 175952)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

September ,2026

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ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Sierra Leone (the Recipient) is implementing the Productive Social Safety Net and Youth Employment Project (the Project) through the National Commission for Social Action (NaCSA), with the involvement of the Ministry of Youth Affairs (MoYA), the National Youth Commission (NaYCOM), Local Councils, the Anti-Corruption Commission (ACC), and Statistics Sierra Leone (Stats SL), as set out in the Financing Agreement for the Original Financing and in the First Additional Financing agreement (the Agreements). The International Development Association (the Association) has provided original financing (P176789) and, as administrator of the Global Risk Financing Facility (GRIF), additional financing (P180035), as set out in the referred Agreements. This ESCP supersedes previous versions of the ESCP and shall apply to the parent project and to the First Additional Financing.

2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the 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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.

4. Adaptive Management: As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative the Commissioner of NaCSA as specified in the Agreements. The Recipient shall promptly disclose the updated ESCP.

5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT[1]			
A	**ORGANIZATIONAL STRUCTURE** The Recipient shall maintain the established Environmental and Social (E&S) unit within NaCSA, comprising at minimum one qualified Environmental Specialist and one Social Development Specialist (SDS). 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 shall 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, and ESMP 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).	Maintain the NaCSA E&S unit throughout Project implementation as set out in the Financing Agreement; Recruit and deploy Local Council ESOs within 3 months of AF Effective Date; The consultant shall be hired to prepare ESIA, and ESMP during implementation	NaCSA

[1] For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	**CAPACITY BUILDING PLAN/MEASURES** Continue to implement and update capacity-building measures for NaCSA and PIU staff, Local Council Desk Officers, implementing agency personnel (MoYA, NaYCOM, ACC, Stats SL), contractors, supervising engineers, community workers, Project beneficiaries, and members of Grievance Redress Committees (GRCs). Training modules shall cover: • ESMF and ESS implementation; • Environmental and social screening; • Labor Management Procedures (LMP) and worker rights; • Occupational Health and Safety (OHS) including emergency preparedness; • SEA/SH Code of Conduct and GBV prevention and response; • Community Health and safety, crowd management during cash transfers; • Disability-inclusive programming; • Stakeholder engagement and GRM management; • Contingent Emergency Response Component (CERC) E&S protocols; • Digital public works-specific ESHS requirements; • Waste management	Commence orientation within 1 month of specialist recruitment; deliver modules prior to any on-ground activities under each subproject. Conduct bi-annual refresher sessions throughout Project implementation.	NaCSA / MoYA / NaYCOM
MONITORING AND REPORTING			
C	**REGULAR REPORTING** Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project. The reports shall include: 1. Implementation status of the ESMF, RPF, LMP, updated SEP, GBV/SEA/SH Action Plan, Security Management Plan (SMP), site-specific ESIAs/ESMPs, and Contractor-ESMPs (C-ESMPs); 2. OHS and community health and safety performance including number and status of resolution of incidents and accidents reported under action E below 3. E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. 4. Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan	Submit Quarterly and annual reports to the Association throughout Project Implementation, commencing after the Effective Date. . Submit each report to the Association no later than 15 days after the end of each reporting period.	NaCSA

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	5. Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them, Implementation of SEA/SH and GBV prevention and response measures; and 6. Status of corrective actions and other E&S commitments under this ESCP.		
D	**CONTRACTORS' MONTHLY REPORTS** The Contractors shall provide NaCSA with monthly monitoring reports, including a procurement report in accordance with the metrics and indicators specified in the respective bidding documents and contracts. Compile and submit such reports to the Association upon request.	Submit monthly to NaCSA throughout the contract period; forward to the Association upon request.	NaCSA / Contractors
E	**INCIDENTS AND ACCIDENTS** Contractor or aggrieved person through NaCSA will promptly notify the Association of any incident or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect or accident on the environment, the affected communities, the public, or workers including but not limited to situations of fatalities or instances of serious bodily harm, violence, fire injuries, physical violence, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), constructional accident, car accidents, communicable diseases, and infections etc. Provide sufficient details regarding the incident or accident, indicating immediate measures taken or planned to be taken to address it, and include 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 some measures to prevent its recurrence. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	Notify the Association no later than 48 hours after learning of the incident or accident; for fatalities or SEA/SH allegations, notify within 24 hours. Provide available details upon request. Submit Root Cause Analysis (RCA) report and CAP no later than 10 days following the initial notice, unless a different timeframe is agreed in writing by the Association.	NaCSA
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	**ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS** • Update, consult, disclose, and implement the Environmental and Social Management Framework (ESMF) (incorporating the Labor Management Procedures) for the Original Financing and Additional Financing activities, consistent with the relevant ESSs and acceptable to the Association. • Prepare, consult, disclose, adopt, and implement site-specific Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs) for infrastructure and digital public works subprojects under Component 2, in accordance with the updated ESMF and applicable ESSs • Require contractors to develop and implement Contractor-ESMPs (C-ESMPs) incorporating site-specific OHS, waste management, community safety, and SEA/SH measures, reviewed and approved by NaCSA prior to commencement of any civil works. • Ensure all subprojects are screened in accordance with the ESMF exclusion list and applicable ESSs. Activities on the exclusion list shall be ineligible for Project financing. Where screening identifies risks, the corresponding E&S instruments shall be prepared, consulted upon, disclosed, adopted, and implemented prior to commencement of the relevant activities	1. ESMF updated and redisclosed within 3 months of AF Effective Date; implement throughout Project implementation. 2. Site ESIAs/ESMPs cleared and disclosed prior to launching procurement/bidding for relevant subprojects; implement throughout construction and operations. 3. C-ESMPs reviewed and approved by NaCSA prior to commencement of civil works; enforce throughout implementation. 4. Screening conducted throughout Project implementation prior to approval of each subproject.	NaCSA / Design Consultants / Local Councils / Contractors
1.2	**MANAGEMENT OF CONTRACTORS** Incorporate all relevant E&S provisions of the ESMF, site ESMPs/C-ESMPs, LMP, SEP, SEA/SH Codes of Conduct, OHS requirements, and Security Management Plan (SMP) into procurement documents and contracts for all works and services. Supervise contractors' compliance with these requirements throughout implementation.	As part of the preparation of all procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts and C-ESMPs provided to the Association upon request.	NaCSA /
1.3	**TECHNICAL ASSISTANCE** Carry out all consultancies, studies, capacity building, training, and other technical assistance activities under the Project in accordance with terms of reference acceptable to the Association and consistent with the ESSs. Finalize all outputs of such activities in compliance with the approved terms of reference.	Throughout Project implementation.	NaCSA / MoYA / NaYCOM

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.4	**CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC)** 1. Adopt and implement the CERC Environmental and Social Management Manual (ESMM) governing emergency response activities triggered under the CERC, including E&S screening, risk management, and incident reporting protocols. a. 2. Where triggered, prepare, disclose, and implement any additional E&S instruments (e.g., CERC-specific ESMPs or action plans) prior to executing CERC activities, in a manner acceptable to the Association. 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. 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	Adoption of the CERC ESMM is a condition of withdrawal of CERC funds. E&S instruments adopted before executing relevant emergency activities.	NaCSA
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	**LABOR MANAGEMENT PROCEDURES** Update and implement the LMP for the Original Financing and the Additional Financing, covering: direct workers, contracted workers (including civil works contractors), and community workers (including cash-for-work and youth employment beneficiaries). The LMP shall include provisions on non-discrimination, equal opportunity, prohibition of child and forced labor, fair wages, terms of employment, and applicable national labor law compliance.	Updated LMP disclosed alongside the ESMF within 3 months of AF Effective Date; implement throughout Project lifecycle	NaCSA / Contractors / MoYA / NaYCOM
2.2	**CHILD LABOR MONITORING (CLM)** Implement child labor screening and monitoring measures as part of the LMP and ESMF to prevent engagement of persons below the legal working age in Project activities, including in community-based and agricultural livelihood components. Document and report findings as part of regular ESHS monitoring.	Throughout Project implementation	NaCSA / Local Councils
2.3	**OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN** Prepare and implement OHS measures as part of site-specific ESMPs and require contractors to include proportionate OHS protocols in their C-ESMPs. Measures shall cover: mandatory personal protective equipment (PPE), hazard identification and control, emergency preparedness and response, and health safety protocols relevant to civil works, community infrastructure, and digital public works activities.	Prepare the OHS Management Plan and implement it prior to commencement of relevant works and enforced throughout implementation.	NaCSA / Contractors / Supervising Engineers

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.4	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** Establish, maintain, and operate a dedicated Grievance Mechanism for all Project workers, including direct NaCSA staff, contracted workers, and community workers. The worker GRM shall include confidential channels specifically for reporting SEA/SH concerns, as described in the LMP and consistent with ESS2.	Establish prior to engaging any Project workers or contractors; maintain and operate throughout Project implementation.	NaCSA / Contractors
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	**WASTE MANAGEMENT PLAN** Prepare and implement Waste and Hazardous Materials Management measures as part of site-specific ESMPs to ensure proper identification, handling, storage, transport, and disposal of: construction waste, hazardous materials, electronic and digital equipment waste, used oils and lubricants, chemical materials, and other project-generated wastes, consistent with ESS3. Engage with the Environment Protection Agency (EPA) Sierra Leone for compliance with national waste disposal standards and Good International Industry Practice (GIIP).	Same timeframe as for the preparation and implementation of the corresponding ESMPs; enforce throughout construction and operational phases.	NaCSA / EPA Sierra Leone / Contractors
3.2	**RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** Incorporate resource efficiency and pollution control measures into ESMPs and C-ESMPs, addressing energy and water use efficiency in community infrastructure; dust, noise, and air emissions management; fuel and chemical storage; and emergency spill response plans. Ensure the Ministry of Agriculture, Forestry and Food Security (MAFFS) provides guidance on sustainable agricultural and livelihood practices for relevant subproject activities.	Same timeframe as for the preparation and implementation of the corresponding ESMP	NaCSA / MAFFS / Contractors
3.3	**PEST MANAGEMENT** The ESMF contains a detailed chapter on pest management, including an assessment of current pest management practice in Sierra Leone; recommended actions by the project to help address short-comings (if any) identified in that assessment; lists of pesticides banned by national law or prohibited by the ESF and ESSs; and guidance on resource efficiency and pollution prevention and management measures to be developed during project implementation.	Throughout Project implementation	NaCSA / MAFFS / Contractors
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	**TRAFFIC AND ROAD SAFETY** Incorporate measures to manage traffic and road safety risks as required in the ESMP or ESMP Checklists to be prepared under action 1.1 above. Assess and manage traffic and road safety risks associated with equipment movement, material transport, and community exposure during construction activities in accordance with the ESMF and site-specific C-ESMPs. Require contractors to prepare and implement traffic management plans as part of C-ESMPs.	ESMP through Project implementation Adopt relevant C-ESMP provisions prior to launching bidding; implement throughout civil works.	NaCSA / Contractors / Supervising Engineers

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.2	**COMMUNITY HEALTH AND SAFETY** Assess and manage specific risks and impacts to the community arising from Project activities and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF, including risks associated with construction activities, traffic movement, operation of agricultural infrastructure, use of agrochemicals, and community exposure to occupational hazards. Assess and manage specific risks and impacts to community health and safety arising from Project activities and incorporate mitigation measures into site-specific ESMPs, covering: construction hazard exposure, communicable disease risks, health risks from chemical/pesticide use in livelihood activities, crowd management during cash transfer operations, and community emergency response. Develop and implement Facility Management Plans for community infrastructure.	Same timeframe as for the preparation and implementation of the ESMPs.	NaCSA / Service Providers / Local Councils
4.3	**SEA/SH Action Plan** Update, implement, monitor, and periodically review existing Gender-Based Violence (GBV) / Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Action Plan that reflects required SEA/SH risk mitigation measures, including: Mandatory worker Codes of Conduct with SEA/SH-specific clauses; Sensitization of project workers, Community awareness-raising programs; GBV service mapping and Survivor-centered referral pathways; Safe and Confidential complaint channels within the GRM; Implementation responsibilities and reporting timelines.	Finalize and adopt within 1 month of AF Effective Date; implement and monitor throughout Project lifecycle with quarterly reporting on indicators.	NaCSA / Service Providers / Local Councils
4.4	**SECURITY MANAGEMENT PLAN (SMP)** Adopt and implement a Security Management Plan (SMP) governing the conduct of security personnel deployed to protect Project assets, workers, beneficiaries, and the public, including crowd control arrangements during cash transfer operations, adhering to principles of proportionality, legality, and basic human rights standards, and consistent with the World Bank's Good Practice Note on Security Personnel.	Adopted prior to engaging security personnel; implemented and monitored throughout Project operations.	NaCSA
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	**RESETTLEMENT FRAMEWORK** N/A This standard is considered not relevant to the proposed Additional Finance (AF). The AF does not involve any land acquisition, physical displacement, or economic displacement of project-affected persons. Activities under Component 2, which provide short-term employment opportunities to poor urban youth through Digital Public Works (DPW), are not anticipated to require access to or use of land in a manner that would trigger the requirements of this standard.	N/A	N/A
5.2	**GRIEVANCE MECHANISM** . Maintain and ensure that the Project Grievance Redress Mechanism (GRM) operationalized in partnership with the Anti-Corruption Commission (ACC) includes effective arrangements to receive, register, investigate, and resolve land acquisition, resettlement, and compensation grievances. Ensure Grievance Redress Committees (GRCs) have adequate representation of women and persons with disabilities.	Establish grievance mechanism prior to commencing any activities; maintained throughout Project implementation	NaCSA / ACC / Local GRCs
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	**BIODIVERSITY RISKS AND IMPACTS** Conduct preliminary screening of all proposed subprojects for risks and impacts on biodiversity and living natural resources using the ESMF screening form. Ensure subprojects with significant impacts on critical natural habitats or protected areas are excluded from Project financing. Where minor impacts are unavoidable, incorporate biodiversity mitigation measures into site ESMPs. Verify whether proposed activity sites are located within or adjacent to protected areas, critical habitats, natural habitats, or other sensitive ecosystems.	Screening conducted prior to approval of each subproject; biodiversity mitigation measures enforced throughout construction.	NaCSA / Contractors / Local Council
ESS 7: INDIGENOUS PEOPLES / SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES **ESS 7 has been assessed and determined not relevant to the Project context in Sierra Leone**			
ESS 8: CULTURAL HERITAGE.			
8.1	**CHANCE FINDS** Incorporate Chance Finds Procedures into the ESMF, all site-specific ESMPs, and civil works contracts. Procedures shall require immediate work stoppage upon discovery of any cultural heritage artifact, structure, or site, and notification of the Monuments and Relics Commission (MRC) and NaCSA within 72 hours of discovery. No works shall resume at the site until authorization is received from the MRC and NaCSA.	Procedures incorporated into all bidding documents and contracts prior to commencement of earthworks; enforced throughout construction..	NaCSA / Contractors / Monuments and Relics Commission (MRC)
ESS 9 ESS 9: FINANCIAL INTERMEDIARIES			

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 9 has been assessed and determined not relevant to the Project			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	**STAKEHOLDER ENGAGEMENT PLAN** Implemented the updated Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10. The SEP shall provide measures to ensure timely, relevant, understandable, and accessible disclosure of Project-related E&S information to all stakeholders; Conduct consultations in culturally appropriate, inclusive, and accessible formats, free of manipulation, coercion, and discrimination; Meaningfully engage women, youth, persons with disabilities, and other vulnerable and underserved groups; Document consultation activities and maintain a public record of feedback received and responses provided..	Implement the updated SEP throughout Project implementation; update as necessary to reflect Project changes or evolving community needs.	NaCSA / MoYA / NaYCOM / Local Councils
10.2	**PROJECT GRIEVANCE MECHANISM** Publicize, maintain, and operate an accessible grievance mechanism, to 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 mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a survivor-centered manner. It shall also address complaints related to targeting, NSR registration, payment systems, data privacy, digital platforms, among others. Publicize, maintain, and operate an accessible Project Grievance Redress Mechanism (GRM), integrated with the ACC grievance handling system, to receive and facilitate the 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. The GRM shall: Accept anonymous complaints; Maintain confidential and survivor-centered channels for SEA/SH complaints and referral to GBV service providers; Function through Local Council-level Grievance Redress Committees (GRCs) with representation of women and persons with disabilities.	Maintain and operate the mechanism throughout Project implementation.	NaCSA / ACC / Local GRCs
INDICATORS FOR IMPLEMENTATION READINESS i. Establishment and staffing of the E&S management unit in NaCSA and Local Councils; ii. Recruitment and training of E&S specialists and ESOs within implementing entities; iii. Coordination arrangements between NaCSA, MoYA, NaYCOM, ACC, Local Councils, and other implementing agencies for E&S risk management; iv. Key E&S assessments and plans to be prepared or updated at the onset of implementation; v. Other project-specific E&S readiness requirements.			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
The following actions are indicators for implementation readiness: A, B, 1.1, 2.3, and 4.3.		

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