

MINISTRY OF INFORMATION AND COMMUNICATIONS



REPUBLIC OF SIERRA LEONE

**SIERRA LEONE DIGITAL TRANSFORMATION PROJECT
(P177077)**

**ENVIRONMENTAL AND SOCIAL COMMENTMENT PLAN
(ESCP)**

DRAFT FINAL

APRIL 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Sierra Leone (the Recipient) will implement¹ the Sierra Leone Digital Transformation Project (the Project), with the involvement of the Ministry of Information and Communications (MIC) working with other ministries, as set out in the Financing Agreement.² The International Development Association (hereafter the “Association”)³ has agreed to provide the original] financing (P177077) for the Project, as set out in the referred agreement(s). [This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.]^{4 5}
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 Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
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 through the Ministry of Information and Communications and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. The Ministry of Information and Communications shall promptly disclose the updated ESCP.

³ In case the project is financed by multiple financing sources (e.g. both an IBRD loan or IDA credit/grant and a TF grant), reference should be made to IBRD/IDA in all of these capacities, with a term like “World Bank” or the “Bank” used to refer to all of them collectively.

⁴ Use this bracketed text when the same, consolidated, and updated ESCP will apply both to the original and additional financing for the project.

⁵ In cases of additional financing where two different ESCPs will apply to the original and additional financing, you can replace paragraph 1 with the following:
The [Borrower/Recipient name] (the [Borrower/Recipient]) will implement additional activities under the [name] Project (the Project), with the involvement of the [name of the Project Implementing Entity(ies)/ministries/agencies involved], as set out in the [additional financing] [Loan Agreement] [Financing Agreement] [Grant Agreement] [and the Project Agreement]. The [International Bank for Reconstruction and Development/International Development Association] (the [World Bank/Bank/ Association]) [, acting as the] [administrator/implementing agency/accredited entity/implementing entity/other] [of] [name the trust fund], has agreed to provide additional financing for the implementation of the additional activities under the Project, as set out in the referred agreement(s). This ESCP shall apply solely to the additional activities under the Project referred to above, and the ESCP for the original financing of the Project, shall continue to apply to the original activities under the Project.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>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 instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Submit semi-annual reports to the Association throughout Project implementation, commencing after the Effective Date. Each report should be submitted to the Association no later than 7 days after the end of each reporting period.</p>	<p><i>Project Coordination Unit (PCU)/Ministry of Information and Communications (MIC)</i></p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly inform the Association of any incidents or accidents related to the project which may have a significant adverse consequence for the environment, target communities, the public, or workers including construction accidents that result in death, serious or multiple injury, events of acute pollution due to air or noise emissions, and inappropriate disposal of hazardous waste. Provide sufficient detail regarding the event, indicating measures taken to address it. Where required by the Association, prepare a detailed report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association of any accident or incident within 2 days after learning about the incident or accident, followed by a detailed report submitted within a timeline proposed by the Association.</p>	<p><i>PCU/MIC</i></p>
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to Association.</p>	<p>Submit the monthly reports to the Association upon request as annexes to the reports to be submitted under action A above.</p>	<p><i>PCU/MIC</i></p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a Project Coordinating Unit (PCU) within MIC with qualified staff and resources including a full time Environmental and Social Specialist to support management of ESHS risks and impacts of the project. Specialized external expertise/consultants for Project activities including ESHS management will be hired as needed.</p>	<p>Establish and maintain in the PCU full time environmental and social specialists within three months of project effectiveness and thereafter maintain these positions throughout Project implementation.</p>	<p><i>PCU/MIC</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project that including a generic Environmental and Social Management Plan (ESMP), Labor Management Procedures (LMP), Chance finds procedure and E-waste management plan, Sexual Exploitation and Harassment and Sexual Harassment (SEA/SH) Action Plan, Stakeholder Engagement Plan, Grievance Redress Mechanism, and Resettlement Policy Framework (RPF) consistent with the relevant ESSs.</p> <p>3. MIC shall cause Contractors and private service providers to prepare and adopt site-specific Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP), as set out in the ESMF</p>	<p>a) Adopt and disclose the ESMF prior to project appraisal, in a manner agreeable to the Association, and thereafter implement it throughout Project implementation.</p> <p>Adopt and disclose the ESMP before launching the bidding process for the respective Project activity and implement it throughout Project implementation, prior to carrying out any activity requiring the implementation of such measures.</p>	PCU/MIC
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, SEA/SH Action Plan into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	Incorporate environmental and social instruments into procurement documents and procedures and ensure contractors comply with them throughout Project implementation.	PCU/MIC
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project including, inter alia, national digital skills gap assessment and ICT skills survey, digital skills training, Feasibility study to strengthen data hosting and storage capacity, are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	PCU/MIC
1.5	<p>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</p> <p>a) Ensure that the CERC Manual as specified in the legal agreement includes a description of the ESHS assessment and management arrangements. Upon</p>	a) Adopt the CERC-ESMF addendum if applicable in a form and substance acceptable to the Association before the commencement of relevant CERC activities.	PCU/MIC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>activation of a CERC, MIC shall revise the project ESMF to include a CERC Addendum for the implementation of the CERC component in accordance with the ESSs.</p> <p>b) Adopt any other environmental and social (E&S) instruments which may be required for activities under CERC component of the Project, in accordance with the CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before implementing the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.</p>	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers' relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	<p>LMP is annexed to the ESMF and shall be disclosed prior to appraisal, and thereafter implemented throughout Project implementation.</p>	<p>PCU/MIC</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>Establish a grievance mechanism after project effectiveness and thereafter maintain and operate it throughout Project implementation.</p>	<p>PCU/MIC/ Contractors</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>E-WASTE MANAGEMENT PLAN</p> <p>Adopt and implement an e-Waste Management Plan (eWMP), as part of the ESMF to manage hazardous wastes, and electronic waste, as consistent with ESS3. The ESMF will specify procedures for effectively managing these wastes.</p>	<p>Adopt the e-waste management plan as part of the ESMF prior project appraisal, and thereafter implement the plan throughout Project implementation.</p>	<p>PCU/MIC</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The Project will make sure that all equipment and infrastructure deployed and procured, including fiber optics, follow resource efficiency standards. The Project will also ensure waste minimization through techniques such as buying in bulk and buying only required items. Only licensed personnel and well-equipped recycling companies should be allowed to manage electronic and hazardous wastes.		
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Resource efficiency and pollution prevention and management measures covered under the ESMF or any subsequent tool to be occasioned by it shall be complied with. Specific measures will be included in the ESMP prepared under 1.3, before commencement of any civil works.</p> <p>Furthermore, all contractor contracts shall include requirements for proper disposal of all liquid and solid waste (including plastic trash), sanitation management, including management of any associated air and noise emissions, and the potential pollution of water sources during construction and operation.</p>	Prior to signing contractor contracts and prior to fund been disbursed for specific project activities.	PCU/MIC
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action [1.3] above and in the site-specific traffic management plans (to be prepared as part of the C-ESMP).</p>	Prior to signing contractor contracts and prior to fund been disbursed for specific project activities, and maintained throughout Project implementation	PCU/MIC
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including the behavior of Project workers, COVID-19 infection, SEA/SH and, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	Throughout Sub-project Implementation and prior to fund been disbursed for specific project activities.	PCU/MIC
4.3	<p>SEA AND SH RISKS</p> <p>Adopt and implement an SEA/SH Action Plan prior to appraisal to assess and manage the risks of SEA and SH under the project.</p> <p>Contractors will be required to assess site-specific SEA/SH risk as part of ESMP and material measures for addressing such risks, which will be costed and included in ESMPs consistent with the project SEA/SH Action Plan.</p>	Adopt the SEA/SH Action Plan prior to project appraisal, and thereafter implement it throughout Project implementation.	PCU/MIC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.4	<p>SECURITY MANAGEMENT</p> <p>The Contractor ESMP will assess Security Personnel requirements to safeguard project workers, sites, assets, and activities and implement measures to manage security risk of the project as needed, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	Before involvement of public or private security personnel.	PCU/MIC
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p>	Adopt the RPF prior to appraisal and thereafter implement the RPF throughout Project implementation.	PCU/MIC
5.2	<p>RESETTLEMENT PLANS</p> <p>Adopt and implement a Resettlement Action Plan (RAP) for sub-projects under the Project for which the RPF requires such full-blown or abbreviated RAPs and consistent with ESS5.</p> <p>Prepare and submit regular monitoring reports on the implementation of RAPs, including issues related to land acquisition, assessment/census of PAPs and compensation, and performance of resettlement-related grievance redress mechanisms.</p>	<p>Adopt and implement the respective RAPs, or ARAPs, including ensuring that before land acquisition and physical displacement, affected parties are fully compensated as applicable, and resettled or their livelihoods restored appropriately.</p> <p>Semi-annually throughout the implementation of RAPs.</p>	PCU/MIC
5.3	<p>GRIEVANCE REDRESS MECHANISM</p> <p>The Grievance Redress Mechanism (GRM) to address resettlement and related complaints is described in the ESMF, RPF, and SEP. The established GRM shall provide anonymous reporting & recording channels that are accessible to all, focusing not only on receiving and recording complaints, but also on their resolution and feedback collection.</p>	Establish a resettlement-focused GRM within 60 days of project effectiveness.	PCU/MIC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Provide regular reports to the Association on the overall performance of the GRM in managing resettlement-related complaints.	Quarterly throughout project implementation, with the first report submitted three months after the mechanism is established.	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Screen Project activities (including civil works) to avoid any significant loss or degradation of natural habitats, including protected areas and other biomes, in accordance with the Project’s ESMF and ESS6.</p> <p>Biodiversity-related risks and impacts shall be comprehensively assessed and managed as part of the ESIA/ESMPs to be conducted in sub-Project sites.</p> <p>Work shall not be carried out in sensitive ecosystems/habitats/species, such as protected and designated areas, community forests, wetlands, and IUCN listed species to avoid elaborate offsets and project delays.</p>	The ESMF will cover all relevant risks to biodiversity, and landscape specific ESIA/ESMPs produced prior to the commencement of subproject works and implemented throughout Project implementation	PCU/MIC
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
There are no actions under the Project preparation related to Indigenous People, therefore there are no mitigation measures to be undertaken under ESS7 for the Project.			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>The potential for chance finds will be comprehensively assessed and managed as part of the ESIA/ESMPs to be conducted in sub-Project sites, in line with ESS8.</p> <p>Work shall not be done in areas with cultural heritage (including landscapes and visuals) of significance to targeted communities to avoid elaborate offsets and delay in project implementation.</p>	Adopt chance find procedures in the ESMF prior to appraisal and implement them throughout Project implementation.	PCU/MIC
ESS 9: FINANCIAL INTERMEDIARIES			
There are no actions under the Project related to Financial Intermediaries, therefore there are no mitigation measures to be undertaken under ESS9 for the Project.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information (with safeguards for vulnerable groups, particularly women, persons with disability and youth, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	Adopt the SEP prior to appraisal, and thereafter implement the SEP throughout Project implementation.	PCU/MIC
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project (including those presented under 5.3), 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.</p> <p>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 safe, confidential, and survivor-centered manner.</p>	Establish the grievance mechanism within 60 days of Project effectiveness. And thereafter maintain and operate the mechanism throughout Project implementation.	PCU/MIC
CAPACITY SUPPORT			
CS1	<p>The MIC shall ensure that there is relevant training for community facilitators, Recipient’s preparation team, PCU staff, stakeholders, communities, contractors, implementing agencies, project workers, etc in the following areas:</p> <ul style="list-style-type: none"> • Stakeholder engagement and project communications (visibility creation) • World Bank ESF • Project GRM • Emergency preparedness and response • Community health and safety. • Implementation of ESMF, RPF, SEP • E&S screening for sub-projects • Environmental and Social Risk Management procedures 	<i>This will be done before commencement of civil works, and periodically (as needed) - during Project implementation,</i>	PCU/MIC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> • COVID 19 transmission, prevention, preparedness and response • Occupational Health and Safety • SEA/SH Risk Mitigation • Disability inclusion training • E&S Documentation and reporting • Information disclosure 		
CS2	Conduct training for Project workers on occupational health and safety including on risk analysis and communication, prevention and preparedness and response arrangements to emergency situations, SEA/SH Risk Mitigation, COVID 19 transmission, prevention, preparedness and response	Done before commencement of civil works, and periodically (as needed) - during Project implementation	PCU/MIC