

MINISTRY OF INFORMATION AND COMMUNICATIONS



REPUBLIC OF SIERRA LEONE

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

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

FINAL

JUNE 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Sierra Leone (the Recipient) will implement 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. The International Development Association (hereafter the “Association”) has agreed to provide financing (P177077) for the Project, as set out in the referred agreement.
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.
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.

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>	Submit semi-annual reports to the Association throughout Project implementation, commencing after the Effective Date. Each report shall be submitted to the Association no later than 7 days after the end of each reporting period.	<i>Project Coordination Unit (PCU)/Ministry of Information and Communications (MIC)</i>
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, <i>inter alia</i>, construction accidents that result in death, serious or multiple injury, events of acute pollution due to air or noise emissions, inappropriate disposal of hazardous waste, and sexual exploitation and abuse and sexual harassment (SEA/SH). Provide sufficient detail regarding the incident or accident, 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>	Notify the Association of any accident or incident within 48 hours (2 days) after learning about the incident or accident, followed by a detailed report submitted within a timeline acceptable to the Association.	<i>PCU/MIC</i>
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>	Submit the monthly reports to the Association upon request as annexes to the reports to be submitted under action A above.	<i>PCU/MIC</i>
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, with terms of reference, experience, and qualifications acceptable to the Association. Specialized external expertise/consultants for Project activities including ESHS management shall be hired as needed, with terms of reference, experience, and qualifications acceptable to the Association.</p>	Establish the PCU with a full-time environmental and social specialist within three months of the Effective Date and thereafter maintain the organizational structure including this position throughout Project implementation.	<i>PCU/MIC</i>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Prepare, disclose, consult upon, adopt and implement an Environmental and Social Management Framework (ESMF) for the Project that includes chance finds procedure consistent with the relevant ESSs.</p> <p>2. MIC shall cause Contractors and private service providers to screen the proposed sub-projects in accordance with the screening tools in the ESMF and thereafter adopt and implement an Environmental and Social Impact Assessment (ESIA) and corresponding Environmental and Social Management Plan (ESMP), as set out in the ESMF and consistent with the relevant ESSs.</p> <p>3. The proposed [subprojects] [activities] described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p>	<p>1) Prepare, consult upon, adopt and disclose the ESMF prior to Project appraisal, in a manner, form, and substance acceptable to the Association, and thereafter implement the ESMF throughout Project implementation.</p> <p>2) Screen sub-projects as per the ESMF and prepare, consult upon, adopt and disclose the ESIA/ESMP before launching the bidding process for the respective Project activity prior to carrying out any activity requiring the adoption of such ESIA/ESMP. Once adopted, implement the respective ESIA/ESMPs throughout Project implementation.</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, and 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 respective contracts and ensure contractors comply with them throughout Project implementation.	PCU/MIC
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project including, inter alia, national digital skills gap assessment and Information and Communication Technologies (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 RESPONSE COMPONENT</p>	a) Prepare, disclose, consult upon and adopt the CERC-ESMF Addendum in a	PCU/MIC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements, including a reference to the CERC Addendum to be included in the ESMF, for the implementation of the CERC component, in accordance with the ESSs.</p> <p>b) Prepare, disclose, consult upon, adopt and implement 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>form and substance acceptable to the Association before CERC activation.</p> <p>b) Prepare, disclose, consult upon, and 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>Prepare, disclose, consult upon, 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>	Prepare, consult upon, adopt and disclose LMP prior to the Effective Date, and thereafter implement it throughout Project implementation.	PCU/MIC
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>	Establish a grievance mechanism prior to engaging project workers and thereafter maintain and operate it throughout Project implementation.	PCU/MIC/ Contractors
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare, disclose, consult upon, adopt and implement Waste Management Plan (WMP), to manage the waste that may be generated from the Project and e-Waste Management Plan (eWMP) as described in the ESMF and subsequent sub-project ESMPs, all consistent with ESS3. The WMP will specify procedures for collecting, transporting, recycling and final disposal of these wastes.</p>	Before commencing of any work, and during preparation of site-specific C-ESMPs, and thereafter implement the WMP/eWMP through Project implementation.	PCU/MIC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The Recipient shall ensure that all equipment and infrastructure deployed and procured, including fiber optics, follow resource efficiency standards, consistent with ESS3. The Recipient shall also ensure waste minimization through techniques such as buying in bulk and buying only required items. Only licensed personnel and well-equipped recycling companies shall be allowed to manage electronic and hazardous wastes.		
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT 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 ESIA/ESMP prepared under 1.2 before commencement of any civil works. 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.	Prior to the commencement of any civil works.	PCU/MIC
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 ESIA/ESMP to be prepared under action [1.2] above and in the site-specific traffic management plans (to be prepared as part of the C-ESMP).	Prior to the commencement of any civil works	PCU/MIC
4.2	COMMUNITY HEALTH AND SAFETY 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 and consistent with ESS4.	Throughout Sub-project Implementation and prior to funds been disbursed for specific project activities.	PCU/MIC
4.3	SEA AND SH RISKS Prepare, disclose, consult upon, adopt and implement an SEA/SH Action Plan to assess and manage the risks of SEA and SH under the Project. Contractors shall be required to assess site-specific SEA/SH risks as part of the ESMP and adopt material measures for addressing such risks, to be costed and included in ESMPs consistent with the Project SEA/SH Action Plan and consistent with ESS4.	Prepare, disclose, consult upon, and adopt the SEA/SH Action Plan prior to the Effective Date, and thereafter implement it throughout Project implementation. Contractor ESMP (including site specific SEA/SH action Plan) shall be prepared before commencement of civil works.	PCU/MIC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.4	<p>SECURITY MANAGEMENT</p> <p>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 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. Contractors shall be required to include these measures in Contractor's ESMP and implement them consistent with ESS4.</p>	Before involvement of public or private security personnel and thereafter throughout Project implementation.	PCU/MIC/ contractors
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Prepare, disclose, consult upon, adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p>	Prepare, disclose, consult upon, and adopt the RPF prior to the Effective Date and thereafter implement the RPF throughout Project implementation.	PCU/MIC
5.2	<p>RESETTLEMENT PLANS</p> <p>Prepare, disclose, consult upon, adopt and implement a Resettlement Action Plan (RAP) for sub-projects under the Project for which the RPF requires such 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 functioning of resettlement-related grievance redress mechanism.</p>	<p>Prepare, disclose, consult upon, and adopt and implement the respective RAPs 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.</p> <p>Submit resettlement monitoring reports semi-annually throughout the implementation of RAPs.</p>	PCU/MIC
5.3	<p>GRIEVANCE MECHANISM</p> <p>The Grievance Mechanism (GM) to address resettlement and Project related complaints is described in the ESMF, RPF, and SEP. The established GM 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>	<p>Establish a resettlement and project GM prior to engagement of workers.</p> <p>Submit reports quarterly throughout project implementation, with the first report submitted three months after the mechanism is established.</p>	PCU/MIC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Provide regular reports to the Association on the overall performance of the Project GM in managing resettlement-related complaints.		
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. Subprojects that will have any substantial impacts on biodiversity and sensitive ecological areas shall be excluded from the Project scope and be ineligible for Project financing.</p> <p>Biodiversity-related risks and impacts shall be comprehensively assessed and managed as part of the ESIAs/ESMPs to be conducted/implemented in sub-Project sites.</p> <p>Work shall not be carried out in sensitive ecosystems/habitats/species such as protected and designated areas, forests, wetlands, and IUCN listed species to avoid elaborate offsets and project delays.</p>	Screen the subprojects and prepare subproject- specific ESIAs/ESMPs prior to the commencement of subproject works and thereafter 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>Prepare, disclose, consult upon a chance find procedure as part of the project ESMF consistent 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			
Not relevant.			
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>Prepare, disclose, consult upon, 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>	Prepare, disclose, consult upon, adopt and implement 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, 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 and operationalize the grievance mechanism prior to engagement of project workers 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 awareness raising • World Bank ESF • Project GM • 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 • COVID 19 transmission, prevention, preparedness and response 	<i>This shall 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"> 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	This shall be done before commencement of civil works, and periodically (as needed) - during Project implementation	PCU/MIC