

# THE REPUBLIC OF LIBERIA



## Recovery of Economic Activity for Liberian Informal Sector Employment (REALISE) (P174417)

## Environmental and Social Management Framework (ESMF)

Updated January 7, 2021

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**LIST OF ACRONYMS**

CBOs	Community based Organizations
CHS	Community Health and Safety
CfWTEP	Cash for Work Temporary Employment Project
EIA	Environmental Impact Assessment
EPA	Environmental Protection Agency of Liberia
EPAG	Empowerment of Adolescent Girls & Young Women
EPML	Environmental Protection and Management Law of Liberia
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environment and Social Management Plan
ESS	Environmental and Social Standard
FDA	Forestry Development Authority
GDP	Gross Domestic Product
GoL	Government of Liberia
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IDA	International Development Association of the World Bank
IPF	Investment Project Financing
LLA	Liberia Land Authority
LACE	Liberia Agency for Community Empowerment
LIPW	Labor-Intensive Public Works
LYEP	Liberia Youth Employment Program
MFDP	Ministry of Finance and Development Planning
MGCSP	Ministry of Gender, Children and Social Protection
MIA	Ministry of Internal Affairs
MME	Ministry of Mines and Energy
MIS	Management Information System
MoA	Ministry of Agriculture
MoL	Ministry of Labor
MYS	Ministry of Youth and Sports
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PDO	Project Development Objectives
POM	Project Operations Manual

PMT	Project Management Team
RAP	Resettlement Action Plan
REALISE	Recovery of Economic Activity for Liberian Informal Sector Employment
RFP	Request for Proposal
RPF	Resettlement Policy Framework
SEA/H	Sexual Exploitation and Abuse/Harassment
UNDP	United Nations Development Program
USD	United States Dollars
YOP	Youth Opportunities Project

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**EXECUTIVE SUMMARY**

**INTRODUCTION:** This Environmental and Social Management Framework (ESMF) builds on the ESMF of the on-going Youth Opportunities Project (YOP) which is implementing similar activities as those planned under the Recovery of Economic Activity for Liberian Informal Sector Employment (REALISE) Project. Several sections of the document have been updated to make it compatible with the requirements of the World Bank’s Environmental and Social Framework and Liberian environmental laws and regulations. Updated sections include implementation arrangements, policy and administrative frameworks, project components and objective, and potential risks and impacts as well as generic mitigation measures, and the budget for implementing the ESMF. Also, relevant materials related to COVID-19 intervention as well as a Labor Management Procedure have been added.

This ESMF will be used by the Project Management Team (PMT) as well as the project implementing institutions which are Liberia Agency for Community Empowerment (LACE) and the Ministry of Youth and Sports (MYS); as well as other collaborators and stakeholders to ensure that environmental and social safeguards concerns are adequately addressed in the sub-projects to be implemented under the REALISE project.

**PROJECT OBJECTIVE AND DESCRIPTION:** The Development Objective of REALISE is to increase access to income earning opportunities for the vulnerable in the informal sector in response to the COVID-19 crisis in Liberia. As such, the project is designed to provide business recovery grants to targeted small (household) businesses which have been negatively affected as a result of COVID and start-up grants in the second phase of the project, Life and business skill trainings, and small-scale community-based public works subprojects. Activities of the project will be carried out under the following four components: Component 1—*Grant Support to Vulnerable Households to Revive or Start Small Businesses*, Component 2—*Temporary Employment Support and Employability Development for Vulnerable Workers*, Component 3—*Capacity Building and Project Implementation and Coordination*, and Component 4—*Contingency Emergency Response Component*.

**GENERAL POLICY AND ADMINISTRATIVE FRAMEWORK:** Several national policies, regulations and laws are applicable to this project including the Constitution of the Republic of Liberia, specifically Article 7, which sets the basis for legal and institutional framework for the protection and management of the environment in Liberia, the Environmental Protection Agency Act (2003), National Environmental Policy, and the Environment Protection and

Management Law (EPML, 2003). Section 6 of the EPML places a mandatory requirement for environmental screening and/or Environmental Impact Assessment of all investment works or projects that are likely to have significant adverse environmental impacts with subsequent issuance of licensing or permitting from the Environmental Protection Agency of Liberia (EPA) as stipulated in the legislation. Other relevant laws and policies include the Liberia Freedom of Information Act (2010) and the Social Protection Policy of Liberia (2013).

The project is prepared under the World Bank Environmental and Social Framework (ESF). The environmental and social risk rating of this project is Substantial. The Environmental risk is rated as Moderate, while the Social risk is rated as Substantial. Eight of the World Bank's Environmental and Social Standards (ESS) are relevant to this project. The relevant ESSs include the following:

- Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
- Environmental and Social Standard 2: Labor and Working Conditions;
- Environmental and Social Standard 3: Resource Efficiency and Pollution Prevention and Management;
- Environmental and Social Standard 4: Community Health and Safety;
- Environmental and Social Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- Environmental and Social Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- Environmental and Social Standard 8: Cultural Heritage; and
- Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure.

**INSTITUTIONAL FRAMEWORK:** Several institutions are responsible for environmental and social governance in Liberia, including the EPA and relevant ministries and agencies, and other governance structures at the level of the local government. However, the EPA is the lead agency for management of the environment in Liberia. Other agencies and ministries with environmental management responsibilities that the EPA coordinates with include the Ministry of Mines and Energy (MME), the Ministry of Agriculture (MoA), the Forestry Development Authority (FDA), and the Liberia Land Authority (LLA), and the Ministry of Public Works (MPW). Other institutions, including the Ministry of Gender, Children and Social Protection (MGCSP), the Ministry of Justice (MoJ), and the Ministry of Labor (MoL) have various responsibilities and coordinate with the EPA as well.

POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS: Overall, the project is expected to have beneficial environmental and social impacts because the emphasis is on supporting the types of activities that will not just minimize negative environmental impacts but also promote enterprises that will have positive impacts on the environment. The project is expected to provide income generating and training opportunities for the unemployed and underemployed in Liberia (mostly Greater Monrovia), with at least 50 percent of the beneficiaries expected to be female. Despite the enormous expected benefits, several environmental issues could arise from some project activities that may adversely impact the environment as well as give rise to social risks that will need to be addressed. Activities under the public work component and value addition activities could give rise to pollution of land, ground and surface water, and air pollution. Project beneficiaries, especially women, are likely to be exposed to sexual exploitation, abuse and harassment (SEA/H) by project implementation staff during recruitment and project implementation. There is also the risk of “elite capture” where project benefits may not reach targeted population. In light of the COVID-19 Pandemic, the risk of beneficiaries and project staff being exposed to and contracting the disease may increase if protocols are not properly observed.

**MITIGATION MEASURES:** A number of measures will be instituted to ensure that the project potential risks and impacts are mitigated. These measures will range from ensuring that environmental and social considerations are considered in project design to ensure that site-specific plans are developed and implemented. For example, the PMT will (i) develop an “exclusion list” to exclude high risk and environmentally detrimental activities from being financed under the project. These activities will include, but not limited to, construction or rehabilitation of large infrastructures; activities that may lead to involuntary resettlement and land acquisition; activities that could promote destruction of forest cover such as charcoal production; and activities involving the production, use or storage of hazardous chemicals. (ii) ensure that subproject activities are screened and appropriate site-specific actions plans are developed to address issues related to occupational health and safety (OHS) as well as community health and safety (CHS), pollution, waste management, restriction on land use, etc.; (iii) design measures that will take into account universal access philosophy, including access to information, process to raise grievance and other issues; (iv) ensure the participation of the vulnerable, disadvantaged and women groups in project design, decision making and implementation; (v) develop and implement SEA/H action plan throughout the lifecycle of the project; (vi) ensure Code of Conduct for project workers is developed and widely disseminated to project staff and staff of contractors; and (vii) ensure that COVID-19 protocols are in place and adhered to.

ENVIRONMENTAL AND SOCIAL SCREENING STEPS: The ESMF provides detailed steps that will guide project implementation to ensure that project activities are properly screened, risks and impacts identified, and mitigation measures instituted. The detailed steps also ensure that the national EIA requirements are followed, and approval and permits are obtained as required before implementing project activities. The project will be required to screen all subproject activities using project checklists and EPA screening forms, prepare and submit a Notice of Intent and Project Brief that are consistent with requirements set out in the EPML and the EPA EIA Procedural Guidelines of 2017, and submit to the EPA for determination of the level of impact assessment that will be required by the project. Once that determination is made, the project will proceed to develop the required instruments. When the instrument required by the EPA is less stringent than that of the Bank's, the more stringent requirement will apply and vice versa.

#### **INSTITUTIONAL ARRANGEMENT AND RESPONSIBILITY FOR IMPLEMENTATION OF PROJECT AND ESMF**

***The Project Management Team:*** Following experience of YOP, there will be a single PMT consisting of consultants hired by MYS and LACE to oversee the overall implementation of the project. The PMT will coordinate project implementation, including organizing regular Project Steering Committee meetings. The PMT will also be responsible for developing all guidelines, establishing appraisal mechanisms, and working collaboratively with the implementing entities to ensure consistent and regular flow of information between internal and external stakeholders. The PMT will comprise coordinator, key technical staff, fiduciary specialists who will be responsible for all financial management and procurement related activities under the project, and safeguards specialists (an Environmental Safeguard Officer and a Social Safeguard Officer) to support, monitor and report on implementation of the Environmental and Social Commitment Plan (ESCP). Implementing agencies will contract experienced/qualified non-governmental organizations (NGOs), local firms, or other organizations to support implementation of some aspects of project activities, especially those related to non-financial support provided to targeted small businesses, business and life-skills trainings, and other support under the public works activities.

**GRIEVANCE REDRESS MECHANISM:** The REALISE project is a multifaceted project having multiple interventions that are mostly expected to have positive impacts in addressing urban poverty and unemployment in the target communities and the country at large. Considerable efforts have been made to include social and environmental risk management in the design and implementation of the project in order to minimize and prevent potential adverse impacts, but

there is always a possibility that interests of some individuals, groups and institutions may still be negatively affected by the activities of the project. Typical grievances that are anticipated from the implementation of subprojects under REALISE include claims and complaints about targeting/recruitment and selection of project beneficiaries (inclusion, exclusion), lack of transparency on transfer of business grants and payment of wages under public works, poor service delivery including delays, unfair treatment by service provider/project staff, and discrimination based on gender or other physical and health conditions. Corrupt practices, human rights violations, child labor, and gender-based violence and sexual exploitation and abuse are among the potential grievances that may arise during implementation of subprojects. Therefore, the project has designed a well-defined, clear and transparent system for receiving, recording and resolving potential concerns and complaints that may arise from project-affected persons. The project will strengthen the Grievance Redress Mechanism (GRM) that was established under YOP which will include reorganizing or reinvigorating the Grievance Redress and Management structures established at community and county levels. The GRM will also be extended to the national level and be expanded to handle all types of grievances arising from implementation of all the project related grievances. The GRM will have dedicated focal persons at community, county, and national levels who will be responsible for grievances coming from different components of project implementation. There will also be a GRM structure for GBV/SEA related complaints. The project GRM will integrate GBV-sensitive measures, including multiple channels to initiate a complaint and specific procedures for SEA/SH such as confidential and/or anonymous reporting with safe and ethical documenting of SEA/SH cases.

**BUDGET FOR IMPLEMENTING ESMF:** To ensure effective implementation of activities in the ESMF, an estimated itemized budget has been developed that should be incorporated into the overall project cost. The activities should also be covered in the project annual work plan and procurement plan as necessary. The provisional budget covers four main items including the cost of hiring an environmental safeguard officer and a social safeguard officer for the entire duration of the project, the cost of E&S capacity building trainings and workshops that will be required during project implementation, the cost of preparing project-specific E&S instruments, and the cost of monitoring implementation of project E&S documents, including the ESMF. The estimated budget for these activities for the entire duration of the project is one hundred sixty-nine thousand United States Dollars (US\$169,000.00).

**MONITORING AND REPORTING ON THE ESMF IMPLEMENTATION:** Monitoring is required to ensure that all the required environmental and social mitigation measures set out in the ESMF for the project are implemented satisfactorily. The objective of monitoring is to ascertain that

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the proposed mitigation measures are being implemented and that there is compliance with the terms and conditions for approvals under the project. Some monitoring indicators include the number of safeguard trainings and workshops conducted, the number of subprojects screened as evidenced by screening forms, number of site-specific plans developed as required, and number of grievances recorded and resolved. Monitoring, evaluation and reporting on environmental and social issues will form part of the overall project implementation processes. As required by the Environmental and Social Commitment Plan (ESCP), contractors will be required to submit monthly E&S report that covers environmental, social, and health and safety performance of the project.

This ESMF is an update of the ESMF developed for YOP. The Project Management Team of YOP held Stakeholder consultations during January 5-6, 2021 intended to inform policy makers about upcoming project (REALISE) and solicit relevant information that would aid successful implementation. PMT held meetings with the Federation of Liberian Youth, the National Disabilities Union of Liberia, Ministries of Commerce, and Labour. Further consultations will be conducted with local leaders, project beneficiaries, international NGOs, relevant government institutions, etc. Section 10 below summarizes key issues raised by the participants.

## 1. INTRODUCTION

The Government of Liberia has requested World Bank financing to support implementation of the Recovery of Economic Activity for Liberian Informal Sector Employment (REALISE) project. The project is aimed at supporting the Government of Liberia's effort to increase access to income earning opportunities for the vulnerable in the informal sector in response to the COVID-19 crisis in Liberia. The project is designed to provide funding for a number of small grants for business recovery, maintenance and startup, skill training, and small-scale community-based public works subprojects.

### 1.1 Purpose/Objectives of the ESMF

The ESMF is intended to be used as a practical tool during formulation, design, implementation, and monitoring of REALISE. This document will be followed during project preparation and implementation for ensuring environmental and social integration in planning, implementation, and monitoring of project supported activities. For ensuring good environmental and social management under REALISE, the ESMF will provide guidance on pre-investment works/studies (such as environmental and social screening, environmental and social assessment, environmental and social management plans, etc.), provide set of steps, processes, procedures, and mechanisms for ensuring adequate level of environmental and social consideration and integration in each investment in the project-cycle; and describe the principles, objectives and approaches to be followed to avoid, minimize or mitigate impacts. The ESMF will facilitate compliance with the relevant environmental policies, regulations, and laws of Liberia as well as with the World Bank's Environmental and Social Standards (ESSs). The ESMF will also guide the preparation of detailed ESMPs during project implementation as appropriate to the project components/sub-components. The specific objectives are to:

- (i) To integrate the environmental and social concerns into the identification, design and implementation of all project interventions in order to ensure that they are environmentally sustainable and socially feasible;
- (ii) To ensure compliance with national laws and regulations, and World Bank requirements;
- (iii) To establish clear procedures and methodologies for the environmental and social planning, categorization and typology, review, approval and implementation of subprojects to be financed under the Project;

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- (iv) To specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social concerns related to subprojects;
  - (v) To determine the training, capacity building and technical assistance needed to successfully implement the provisions of the ESMF;
  - (vi) To establish the project funding required to implement the ESMF requirements;
  - (vii) To identify practical resources for implementing the ESMF.

## **1.2 Rationale of the ESMF**

The project is expected to provide funding for several subprojects for which the exact subproject locations are yet to be finalized or not known at this stage. The exact subproject locations will be determined during the implementation stage only. The project will provide funding for skill training and, more importantly, for activities that are likely to generate negative environmental and social impacts such as small-scale public works or infrastructure development. The number, type, and locations of these interventions will be decided only during the project implementation stage. Therefore, the environmental and social risks and impacts of these future interventions could not be identified and specific mitigation measures established at this preparation stage. This ESMF will serve as a procedural guidance for environmental and social appraisal and management during project implementation.

As outlined in the ESMF objective, the ESMF will provide the necessary background for environmental and social considerations, a checklist of potential issues of the project activities to be considered and built into the design of the project, and step-wise procedural guidelines on screening of subprojects and preparation of site-specific plans. Like the project implementation manual which guides the overall implementation of the project, the ESMF will serve as the reference guide on environmental and social issues. The ESMF is a living document and will be reviewed and updated periodically as needed.

## **2. PROJECT DESCRIPTION**

The REALISE project is designed to provide funding for a number of small grants for business recovery, maintenance and startup, skill training, and small-scale community-based public works subprojects. The project is expected to prioritize and adapt interventions that benefit women, and at least 50 percent of the beneficiaries will be female. Amongst other things, the project will contribute to the development of informal sector small businesses and narrowing the infrastructure gaps by addressing some of the gaps in small-scale infrastructure and access to services through labor-intensive public works. The project has four components as described in the section below.

### **2.1 Project Components**

The REALISE project is a social protection project of the Government of Liberia with support from the World Bank. The project is designed to increase access to income earning opportunities for the vulnerable in the informal sector in response to the COVID-19 crisis in Liberia. The project has the under listed four components:

#### **Component 1: Grant Support to Vulnerable Households to Revive or Start Small Businesses**

This component aims to provide support to vulnerable small businesses in the informal sector. The component will support business maintenance and recovery/development with grants and training to existing vulnerable (temporarily closed or at risk of closure) informal small businesses; It will also provide technical support and grants to new small businesses in the informal sector in urban areas (in the second phase of project implementation). The component will also finance a range of support services, including business skills development training and mentoring, and will actively promote engagement of women in higher productivity (sometimes referred to as 'male-dominated') sectors to promote higher earnings among women.

#### **Component 2: Temporary Employment Support and Employability Development for Vulnerable Workers**

Component 2 will provide temporary employment and employability development for vulnerable workers struggling to find gainful employment opportunities during and after the COVID-19 crisis through community-based public works activities. It will seek to: i) sustain consumption levels of vulnerable households; ii) build employability and life skills of individuals from vulnerable households to improve economic inclusion and increase wellbeing; and iii)

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increase economic, environmental and social benefits for communities by strengthening community assets. Labor-intensive public works (LIPW) in urban areas will facilitate reentry into productive employment while improving environment and general living conditions for the poor and vulnerable in urban areas.

**Component 3: Capacity Building and Program Implementation and Coordination**

This component will support government and other actors' capacity strengthening for the coordination, design, and implementation of the project. These will include administrative, technical, and financial management of the project by Project Management Team (PMT), coordination among all institutional partners to ensure the efficient flow of information among all actors, and coordination with the private sector. The component will also support establishment of monitoring and evaluation mechanism of the project's results and impact, development of communication activities to publicize and disseminate project results, best practices, and success stories, Studies, and impact evaluations.

**Component 4: Contingency Emergency Response Component (CERC)**

The component has provision of zero amount to allow for rapid reallocation of loan proceeds from other project components during an emergency.

### **3. LEGISLATIVE & INSTITUTIONAL FRAMEWORK**

#### **3.1 Legislative Framework**

The 1986 Constitution of the Republic of Liberia, specifically Article 7, sets the basis for legal and institutional framework for the protection and management of the environment in Liberia. It provides for public participation of all citizens in the protection and management of the environment and natural resources in Liberia. The Environment Protection Agency (EPA) of the Republic of Liberia was established on November 26, 2002 by an Act of the Liberia National Legislature under the Executive Branch of Government to function as an autonomous body with the principal authority for the protection and management of the environment in Liberia.

The Constitution sets the basis for the formulation of several environmental regulations, policies, and laws that are relevant to this project. The relevant regulations, policies, laws, and guidelines are discussed below.

##### **The Environmental Protection Agency Act 2002**

The Environmental Protection Agency of Liberia was created by this Act. The Act was approved (enacted) in 2002 and published in 2003. Section 5 of the Act designates the EPA as the principal Liberian authority for environmental management which shall co-ordinate, monitor, supervise, and consult with relevant stakeholders on all the activities for environmental protection and the sustainable use of natural resources. Section 6 (b) of the Act stipulates that the EPA should propose environmental policies and strategies to the Policy Council and ensure the integration of environmental concerns in the overall national planning.

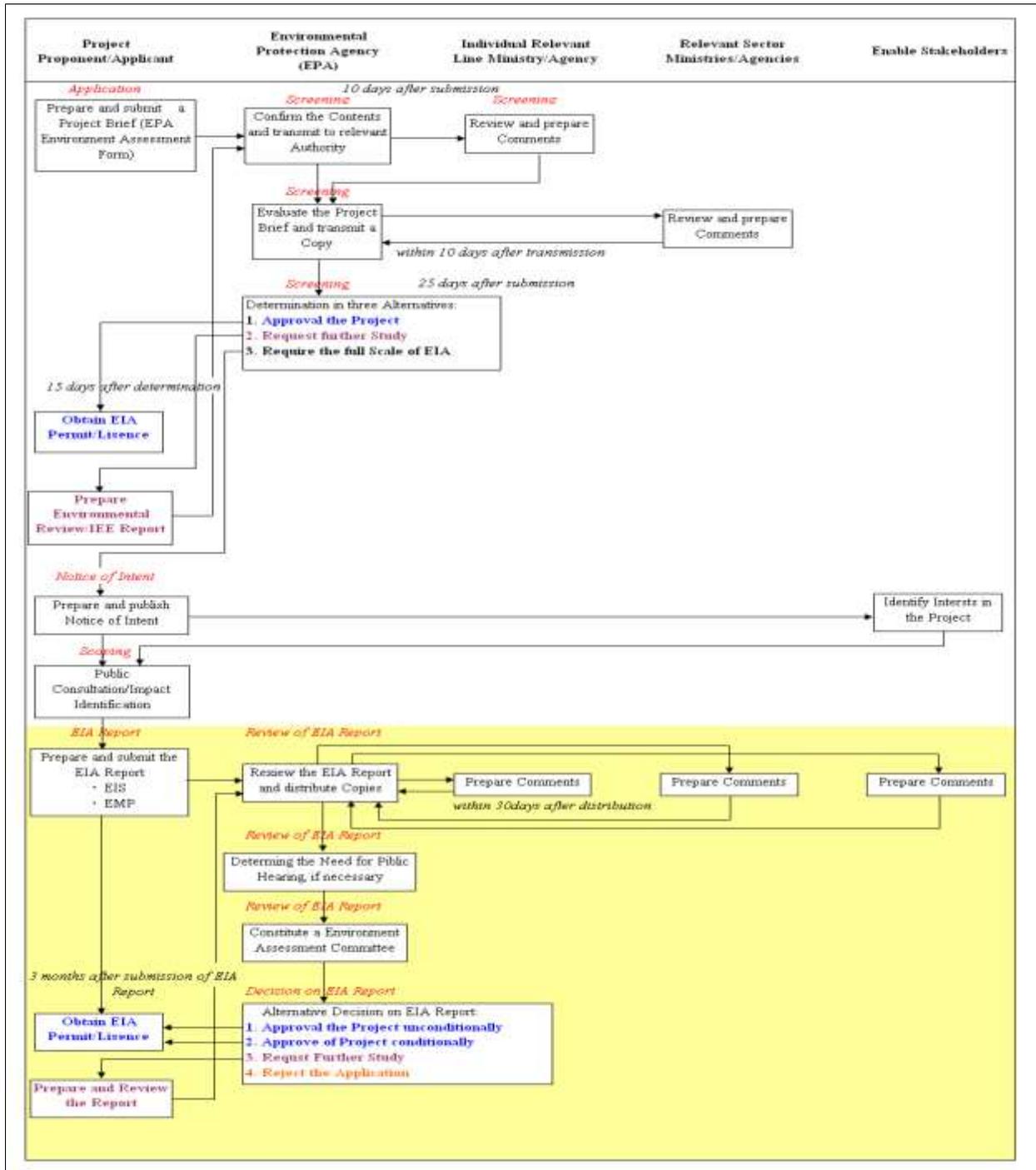
##### **The Environmental Protection and Management Law (EPML) of Liberia**

The EPML is the principal piece of legislation covering environmental protection and management in Liberia in parallel to the EPA Act. The Act provides the legal framework for the sustainable development, management and protection of the environment by the EPA in partnership with relevant ministries, autonomous agencies and organizations. It also stresses inter-sectoral coordination while allowing for sector specific statutes. The Environment Protection and Management Law (EPML, 2003b) defines the specific requirements for performing an ESIA and other measures required to protect the environment in Liberia.

Section 6 of the EPML requires an ESIA license or permit for the commencement of projects that have the potential to impact the environment. An ESIA is required for some specific types of projects as defined in Annex I of the EPML, while the need for an ESIA for other projects may be determined on a case-by-case basis after review of project brief by the EPA. The small-scale

infrastructure development aspects of this project will require the project to acquire environmental permit prior to the commencement of activities in that category. The flowchart provides the environmental screening process of the EPA.

FIGURE 1: ENVIRONMENTAL IMPACT ASSESSMENT PROCESS IN LIBERIA



Other policies and laws that are relevant to this project include the Liberia Land Rights Policy (2013), the Land Rights Act (2018), the Land Administration Policy (2015), National Environmental Policy (2003), the National Environmental and Occupational Health Policy (2010), Freedom of Information Act (2010) and the Social Protection Policy of Liberia (2013). Liberia Freedom of Information Act acknowledges that access to information is indispensable to genuine democracy and good governance and, Article 15(c) of the Constitution of Liberia provides that no limitation shall be placed on the public right to be informed about the government and its functionaries. Government of Liberia has put in place structures and processes to promote participation, consultation, and grievance redress at local levels. The Social Protection Policy on the other hand recognizes vulnerable people to include children, older people, people with disabilities and chronically ill. Liberia has also ratified international conventions related to disability, women, and children's rights.

### **3.2 Institutional Framework**

Environmental and social governance in Liberia is divided between the EPA and some other ministries and national authorities on the national level, and the Environmental and Social Committees, on the local level.

At the national level, the Environmental Protection Agency (EPA) of Liberia is the main agency and principal authority for environmental management. In addition to the EPA, other institutions involved in environmental protection and management include the Ministry of Mines and Energy (MME), the Ministry of Agriculture (MoA), the Forestry Development Authority (FDA) and the Liberia Land Authority (LLA). Other institutions, including the Ministry of Gender, Children and Social Protection (MGCSP), the Ministry of Justice (MoJ), and the Ministry of Labor (MoL) have various social protection responsibilities.

At the local level (county and district level), the EPA Act authorizes the establishment of County and District Environmental Committees and directs the National Environmental Policy Council to provide guidelines for their establishment. Each County Committee is composed of county and district officials, traditional leaders, private citizens, and two local representatives to the national legislature. The Committee is staffed by a County Environment Officer, hired by the EPA, but responsible to the County Committee.

The District Environment Committees are to be established by and report to the relevant County Environment Committee. They are charged with promoting environmental awareness and mobilizing the public to manage and monitor activities within the district to ensure that

they do not have any significant impact on the environment. The District Committees are composed of district officials, mayors, chiefs, and private citizens and are staffed by a District Environment Officer hired by the EPA.

In addition to assisting the County and District Committees in the fulfillment of their responsibilities, the County and District Environment Officers are responsible for compiling reports to the EPA, promoting environmental awareness, and conducting public hearings on environmental impact assessment in the County and the District.

The EPA Act also provides for the establishment of an Environmental Court and the appointment of Environmental Inspectors to ensure the enforcement of environmental requirements and standards developed by the EPA.

### **3.3 The World Bank's Environmental and Social Framework**

Since October 2018, all World Bank funded Investment Project Financing (IPF) operations are required to follow the Environmental and Social Framework (ESF) consisting of ten (10) Environment and Social Standards (ESSs). These ESSs set out the environmental and social requirements and responsibilities of the borrowers throughout the life cycle of the project, including the identification and assessment of environmental and social risks and impacts associated with the project. The borrower has the responsibility to manage the identified risks and impact throughout the life of the project.

The Bank has undertaken an initial screening of the proposed project activities to determine the Environmental and Social Risk Classification of the project and to identify the specific ESSs that are relevant to the project. Based on the initial screening, the Environmental risk is rated as Moderate, while the Social risk is rated as Substantial. The overall Environmental and Social Risk of this project is rated as Substantial. The initial screening process has also established that eight of the ten ESSs are relevant to this project. The relevant ESSs are given below:

- (i) Environmental and Social Standard 1: Assessment and Management of Environmental and Social Risks and Impacts;
- (ii) Environmental and Social Standard 2: Labor and Working Conditions;
- (iii) Environmental and Social Standard 3: Resource Efficiency and Pollution Prevention and Management;
- (iv) Environmental and Social Standard 4: Community Health and Safety;
- (v) Environmental and Social Standard 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;

- (vi)
- (vii) Environmental and Social Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- (viii) Environmental and Social Standard 8: Cultural Heritage; and
- (ix) Environmental and Social Standard 10: Stakeholder Engagement and Information Disclosure.

Table 1 below provides a summary of the relevant ESSs, objectives, requirements, and relevance to the project.

TABLE 1: SUMMARY OF THE RELEVANT ESS'S, OBJECTIVES, REQUIREMENTS, AND RELEVANCE TO THE PROJECT.

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
<p>ESS-1 Assessment and Management of Environmental and Social Risks and Impacts</p>	<p>Identify, assess, evaluate, and manage environment and social risks and impacts in a manner consistent with the ESF. Adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities</p>	<p>The types of E&amp;S risk and impacts that should be considered in the environmental and social assessment. The use and strengthening of the Borrower’s environmental and social framework for the assessment, development and implementation of World Bank financed projects where appropriate.</p>	<p>E&amp;S risks and Impacts have been preliminary identified based on consultations with primary stakeholders including communities and implementing agency. Detailed IEE/ESIA and ESMP will be prepared in addition to this ESMF, where required.</p>
<p>ESS-2 Labor and Working-Conditions</p>	<p>Promote safety and health at work. Promote the fair treatment, non-discrimination, and equal opportunity of project workers. Protect project workers, with particular emphasis on vulnerable workers. Prevent the use of all forms of forced labor and child labor. Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. Provide project workers with accessible means to</p>	<p>Requirements for the Borrower to prepare and adopt labor management procedures. Provisions on the treatment of direct, contracted, community, and primary supply workers, and government civil servants. Requirements on terms and conditions of work, non-discrimination and equal opportunity and workers organizations. Provisions on child labor and forced labor. Requirements on occupational health and safety, in keeping with the World Bank Group’s Environmental, Health,</p>	<p>The project will finance labor intensive small-scale public works. Risks associated with the use of hand-held tools such as shovel, machete, rake, etc. and the potential of being exposed to disease causing agents during these activities do exist. Though this risk is low, steps need to be taken to ensure that the risk is further reduced to minimize injury and safeguard the health and safety of workers. A stand-alone OHS plan is not required. The specific steps and measures will be incorporated in the</p>

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World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
	raise workplace concerns.	and Safety Guidelines (EHSG).	project ESMP.
ESS-3 Resource Efficiency and Pollution Prevention and Management	Promote the sustainable use of resources, including energy, water, and raw materials. Avoid or minimize adverse impacts on human health and the environment caused by pollution from project activities. Avoid or minimize project-related emissions of short and long-lived climate pollutants. Avoid or minimize generation of hazardous and non-hazardous waste. Minimize and manage the risks and impacts associated with pesticide use. Requires technically and financially feasible measures to improve efficient consumption of energy, water, and raw materials, and introduces specific requirements for water efficiency where a project has high water demand.	Requires an estimate of gross greenhouse gas emissions resulting from project (unless minor), where technically and financially feasible. Requirements on management of wastes, chemical and hazardous materials, and contains provisions to address historical pollution. ESS-3 refers to national law and Good International Industry Practice, in the first instance the World Bank Groups' EHSGs.	With respect to Resource Efficiency, the project and the ESA process will identify feasible measures for efficient (a) energy use; (b) water usage and management to minimize water usage during construction/ renovation, conservation measures to offset total construction water demand and maintain balance for demand of water resources; and (c) raw materials use by exploring use of local materials, recycled aggregates, use of innovative technology so as to minimize project's footprints on finite natural resources. With respect to Pollution Management the project will develop, as part of the ESA process, prevention and management measures to offset risks and impacts of pollution from potential Sources.
ESS-4 Community Health and Safety	Anticipate or avoid adverse impacts on the health and safety of project-affected communities during project life-cycle from routine and non-routine	Requirements on infrastructure, taking into account safety and climate change, and applying the concept of universal access, where technically and financially feasible. Requirements	The project plans to reduce gender gap and provide opportunities for women for training and work in close proximity of males therefore raising concerns for GBV/SEA. These activities

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
	<p>circumstances. Promote quality, safety, and climate change considerations in infrastructure design and construction, including dams. Avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials. Have in place effective measures to address emergency events. Ensure that safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.</p>	<p>on traffic and road safety, including road safety assessments and monitoring. Addresses risks arising from impacts on provisioning and regulating ecosystem service. Measures to avoid or minimize the risk of water-related, communicable, and non-communicable diseases. Requirements to assess risks associated with security personnel, and review and report unlawful and abusive acts to relevant authorities.</p>	<p>are likely to expose women to authorities and project’s worker who have higher propensity to exploit women Furthermore, the projects activities are likely to bring people into close proximity and are likely to increase in-person interactions. Female beneficiaries may be targeted for GBV/SEA/SH by the implementing staffs and public authorities. They may be kept away from selection, their inherent disproportionate risks and impacts because of their physical vulnerability which would require differentiated mitigation measures.</p> <p>In addition, GBV/SEA/SH risks will be managed by: i) increasing awareness on SEA/SH issues, ii) requiring the signing and adhering to Code of Conduct (CoC) as mandatory for implementation staffs and public authorities associated with the project, iii) regularly sensitizing, briefings/training/workshop to educate people about consequences/disciplinary action for</p>

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
			<p>violating the CoC and committing GBV/SEA/SH. To avoid any such happening, the MYS/LACE shall develop mitigation measures/management plan and hire a Social Safeguards Officer with GBV expertise and work with specialized organizations to manage risks, i.e. GBV service providers as required and recommended. Project GRM will include specific provisions to address issues related to SEA/SH. All Project workers including beneficiaries will undergo sensitization building measures as well as training related to GBV/SEA/SH.</p> <p>The project will require training and protocol to avoid spread of COVID-19 cases. MYS shall update POM including COVID protocol. These risks will be mitigated by adhering to physical distancing, mask wearing, and hand washing practices; consistent awareness raising on COVID-19 issues, and maintenance of WHO guidelines during project preparation and</p>

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World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project implementation phases.
<p>ESS-5 Land Acquisition Restrictions on Land Use and Involuntary Resettlement</p>	<p>Avoid or minimize involuntary resettlement by exploring project design alternatives. Avoid forced eviction. Mitigate unavoidable adverse impacts from land acquisition or restrictions on land use by providing compensation at replacement cost and assisting displaced persons in their efforts to improve, or at least restore, livelihoods and living standards to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher. Improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure. Conceive and execute resettlement activities as sustainable development programs.</p>	<p>Applies to permanent or temporary physical and economic displacement resulting from different types of land acquisition and restrictions on access. Does not apply to voluntary market transactions, except where these affected third parties. Provides criteria for “voluntary” land donations, sale of community land, and parties obtaining income from illegal rentals. Prohibits forced eviction (removal against the will of affected people, without legal and other protection including all applicable procedures and principles in ESS5). Requires that acquisition of land and assets happens only after payment of compensation and resettlement has occurred. Requires community engagement and consultation, disclosure of information and a grievance mechanism.</p>	<p>The project is not likely to require any land acquisition, cause any restrictions to the land use and involuntary resettlement. However, given the nature of informality of many settlements in urban areas, the project shall screen the related risks and impacts and develop and implement the mitigation and management plan. A separate RPF has been prepared to account for any cases which may arise during project implementation. Guideline provided in the RPF associated with this ESMF will follow for each sub-project.</p>
<p>ESS-6 Biodiversity Conservation and Sustainable</p>	<p>Protect and conserve biodiversity and habitats. Apply the mitigation hierarchy and the precautionary</p>	<p>Requirements for projects affecting areas that are legally protected designated for protection or</p>	<p>The project may affect biodiversity and/or living natural resources in case project funds businesses/natural</p>

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World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
Management of Living Natural Resources	approach in the design and implementation of projects that could have an impact on biodiversity. To promote the sustainable management of living natural resources.	regionally/internationally recognized to be of high biodiversity value. Requirements on sustainable management of living natural resources, including primary production and harvesting, distinguishing between small-scale and commercial activities. Requirements relating to primary suppliers, where a project is purchasing natural resource commodities, including food, timber and fiber.	resource- based enterprises that uses timber/wood-based fuel, farming etc. The ESMF will put provisions not to adversely affect biodiversity, habitats as well as promote sustainable management of living natural resources by natural resource-based enterprises. Besides, potential activities affecting biodiversity will be included in the negative list.
ESS-8 Cultural Heritage	Protect cultural heritage from the adverse impacts of project activities and support its preservation. Address cultural heritage as an integral aspect of sustainable development. Promote meaningful consultation with stakeholders regarding cultural heritage. Promote the equitable sharing of benefits from the use of cultural heritage.	Requires a chance finds procedure to be established. Recognition of the need to ensure peoples’ continued access to culturally important sites, as well as the need for confidentiality when revealing information about cultural heritage assets that would compromise or jeopardize their safety or integrity. Requirement for fair and equitable sharing of benefits from commercial use of cultural resources. Provisions of archaeological sites and material, built heritage, natural features with	ESS8 is relevant in case the project finances activities that may potentially use tangible and non-tangible cultural heritage for commercial purposes. If a subproject intends to use cultural heritage of any project affected parties (including individuals and communities) for commercial purposes, it will inform the project affected parties of: (a) their rights under national law; (b) the scope and nature of the commercial development and the potential impacts; and (c) the potential

World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
		cultural significance, and moveable cultural heritage.	consequences of such development and impacts. The subproject will not proceed with such commercial use unless it: (a) carries out meaningful consultation with stakeholders; (b) provides for fair and equitable sharing of benefits from commercial use of such cultural heritage, consistent with customs and traditions of the project affected parties; and (c) identifies mitigation measures according to the mitigation hierarchy. The project will be require to develop and adapt chance find procedures as and when needed.
ESS-10 Stakeholder-Engagement-and-Information-Disclosure	Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them. Assess stakeholder interest and support for the project and enable stakeholders' views to be taken into account in project design. Promote and provide means for effective and inclusive engagement with project-affected	Requires stakeholder engagement throughout the project life cycle, and preparation and implementation of a Stakeholder Engagement Plan (SEP). Requires early identification of stakeholders, both project-affected parties and other interested parties, and clarification on how effective engagement takes place. Stakeholder engagement to be conducted in a manner proportionate to the nature, scale, risks and impacts of the project,	<b>A separate SEP has been prepared to address ESS10.</b>

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World Bank ESS Policy, Standards, Directive	Objectives	Requirements	Relevance & Extent of Relevance to the sub-project/project
	parties throughout the project life-cycle. Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.	and appropriate to stakeholders' interests. Specifies what is required for information disclosure and to achieve meaningful consultation.	

In addition to the relevant ESSs, the World Bank Group General Environmental, Health and Safety (EHS) Guidelines are also relevant to this project. The EHS Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP). These General EHS Guidelines are designed to be used together with the relevant Industry Sector EHS Guidelines which provide guidance to users on EHS issues in specific industry sectors. A complete list of industry-sector guidelines can be found at [www.ifc.org/ehsguidelines](http://www.ifc.org/ehsguidelines).

In view of the COVID-19 crisis, contractors are required to adhere to and incorporate various COVID-19 considerations in worksites arrangement. Various WHO advice and guidance will apply, including the following:

[WHO COVID-19 advice for the public](#), [WHO interim guidance on water, sanitation and waste management for COVID-19](#) [WHO interim guidance on water, sanitation and waste management for COVID-19](#).

In view of the relevant Environmental and Social Standards, the project is required to develop and implement several management tools in addition to this ESMF throughout the life cycle of the project. These management tools include a Resettlement Policy Framework (RPF), a Labor Management Procedure (LMP), which has been incorporated in this ESMF, a Stakeholder Engagement Plan (SEP), an Environmental and Social Commitment Plan (ESCP), and a Resettlement Action Plan (RAP), if required. A draft ESCP and SEP has been prepared and disclosed and will be updated and implemented during project implementation.

#### **4. ENVIRONMENTAL AND SOCIAL BASELINE DATA**

##### **4.1 General Project Location**

The quadrangle of Liberia is located on the western side of the African Continent and southwest corner of the West Coast of Africa. It is positioned on the Atlantic coastline of Africa, and has a surface area of 111,370 km<sup>2</sup>, and the dry land extent is 96,160 km<sup>2</sup>. It lies between the longitudes of 7°30' and 11°30' west and latitudes 4°18' and 8°30' north. It is bordered by Guinea from the north, Sierra Leone from the west and Côte d'Ivoire from the east (see Figure 2). Liberia has a studded coastline approximately 560 km long. It is characterized by unbroken sand strips and is dominated by lagoons and marshes. Generally, Liberia has low relief topography. However, the hinterland is made up of ill-defined and dissected plateaus and low relief mountains few rising abruptly above the surface to an elevation of 400m above sea level

(asl). The highest mountain (Mount Wutivi) is located in the northeast (Yekepa) and rises to an elevation of approximately 1,380m asl.

FIGURE 2: MAP OF LIBERIA



Source: EarthTime Inc.

## 4.2 Land Environment

Liberia has virgin rain forests that are primarily located inland and in mountainous areas. The rest of the land is occupied by small farms. Liberia has four types of vegetation cover. Those are distributed according to the following: brush, grassland, cultivated and tree crops dominate the central and coastline areas; swamps are present as patches along the coastline mainly near river mouths; broadleaf evergreen forests are present in the southeastern part of the country; and broadleaf deciduous and evergreen forests dominate the northern parts and are present in the central parts.

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## **4.3 Physical Environment**

### **4.3.1 Meteorological Setting**

The climate of Liberia is determined by the equatorial position and the distribution of low and high-pressure belts along the African continent and Atlantic Ocean. A fairly warm temperature throughout the year with very high humidity is common because of the moderating influence of the ocean and the equatorial position (UNDP, 2006).

### **4.3.2 Precipitation**

Liberia has two seasons: rainy and dry seasons. The dry season lasts from November to April and the rainy season is from May to October. Average annual rainfall along the coastal belt is over 4000 mm and declines to 1300 mm at the forest-savannah boundary in the north (Bongers et. al. 1999). The months of heavy rainfall vary from one part of the country to another, but are normally June, July and September. The driest part of the country is along a strip of the eastward flowing Cavalla River, but even there, the land receives over 1778 mm of rain a year. Monrovia receives almost 4572 mm, about twice the estimate of rain annually. Observations concerning the diurnal distribution of rainfall prove that two-thirds of the rain along the coast, particularly in Monrovia and its environs fall during the night between 18:00 and 07:00 hours. Most of the rest of the rain usually falls during the morning while only a minimum of rain is recorded between mid-day and early afternoon.

### **4.3.3 Temperature and Sunshine**

The Atlantic Ocean has an additional ameliorating effect on the temperature along the coast with maximum annual and daily variations (UNDP, 2006). Generally, temperature remains warm throughout the country and there is little change between seasons. The temperature over the country ranges from 27-32°C during the day and from 21-24°C at night. The average annual temperature along the coast ranges from 24°C to 30°C. In the interior it is between 27-32 °C. The highest temperature occurs between January and March and the lowest is between August and September.

The sun is overhead at noon throughout the year, giving rise to intense insolation in all parts of the country, thus resulting in high temperatures with little monthly variations (UNDP, 2006). Temperature would have been much higher had it not been for the effect of the degree of the cloud cover, air, humidity and rainfall, which are influenced by the vegetation cover of the

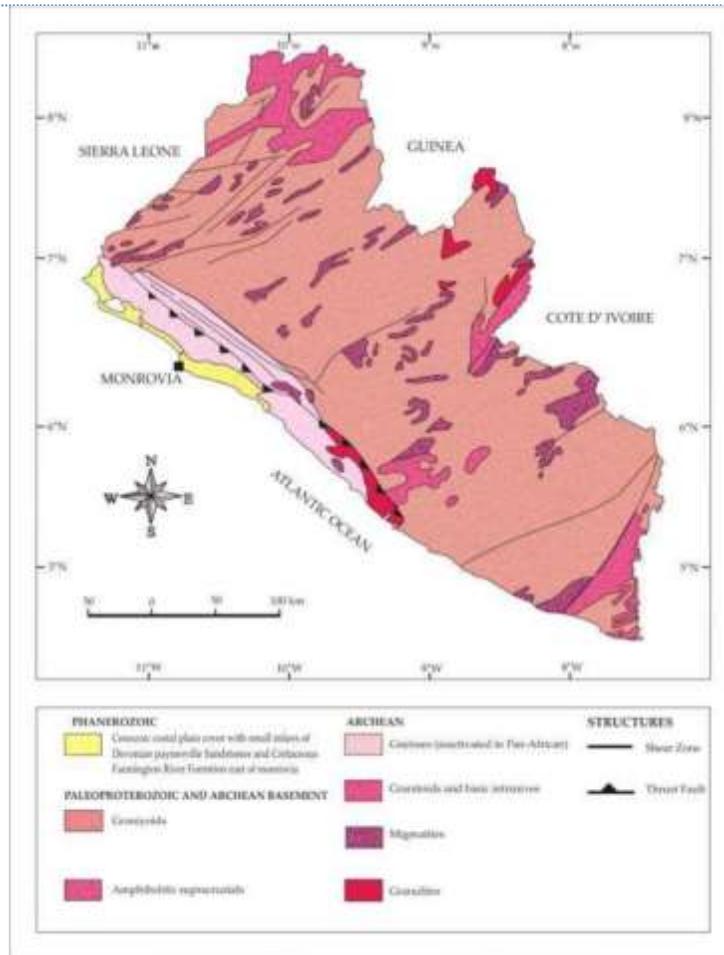
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country. The days with longest hours of sunshine (average of six hours a day) fall between December and March. Daily sunshine hours are at a minimum during July, August and September.

#### **4.3.4 Geological Setting**

Liberia is underlain by the Guinea Shield of West Africa and is composed mainly of Precambrian igneous and metamorphic rocks. Other rocks occur locally and are chiefly Paleozoic sandstone, Jurassic diabase dikes Cretaceous sandstones and Quaternary unconsolidated deposits. Rock outcrops are sparse in Liberia owing to tropical weathering that has produced a thick laterite and saprolite cover, which supports a dense rain forest. The rocks forming this crystalline shield consist of an older series of granulitic and migmatitic gneisses and amphibolites with subordinate granitoids. Remnants of slightly younger supercrustal rocks or sedimentary and volcanic origin are aligned predominantly in a SW-NE direction. Phanerozoic sediments are only exposed along a narrow coastal strip.

FIGURE 3: GEOLOGICAL OVERVIEW OF LIBERIA



Source: EarthTime Inc.

#### 4.3.5 Soil Type

The climate tends to become the dominant soil-forming factor in Liberia, reinforced by the associated effects of the abundant and dense vegetation. The warm and humid climate conditions cause intensive mechanical and chemical weathering of the parent rock and leaching of the soil profile. As a result, Liberian soils share many important features, even though some minor variations reflect the more local influence of relief and geology. The bedrocks from which the rocks have formed are mainly of crystalline, igneous and metamorphic origin, consisting of granites, gneisses, gneissic sandstone and schists and shales. The three major groups of soil in Liberia can be identified: latosols, lithosols and regosols.

The latosols are lateritic soils occupying about 75% of the total area and occurring on undulating and rolling land. They are heavily leached, and silica, nutrients and humus are mostly washed out. Iron and aluminum minerals have accumulated as permanent residual

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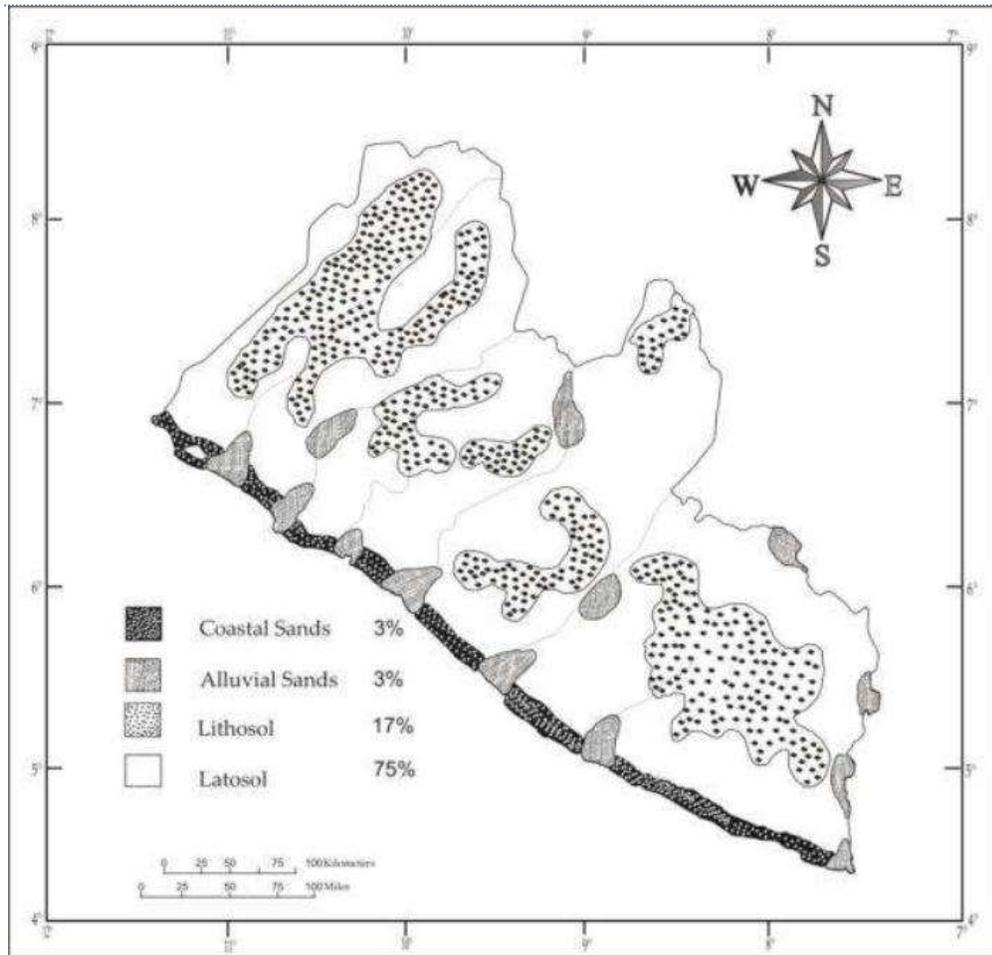
materials, forming hardpans and cemented layers within the subsoil, while on the surface hard and rounded iron oxides can be observed. This process which is called laterization has a pronounced binding effect, making the soils impermeable and increasing the hazards of run-off and erosion. The prevalence of the iron oxides gives the laterites the characteristic brown and red color.

In sharp contrast to the latosols are azonal soils, classified as lithosol. The striking characteristic of these soils is that profile development is very slow and often subject to erosion. The lithosol represent about 17% of the total area on mostly hilly and rugged land. They are mostly very shallow and frequently show outcrops of decomposing rocks because of their elevated position. The percentage of the gravel is also very high and therefore nutrient and moisture storage capacity of the soil is greatly reduced.

Regosols are sandy soils which occur within the narrow coastal belt and also in small patches farther inland. Along the coast they are mainly marine sediments consisting of more than 70% of fine to coarse sand and silt. These sands are heavily leached and bleached to an almost white color, and the percentage of clay and organic matter is very small. Where the drainage is poor, swamps develop.

Alongside the stream and river beds rich alluvial soils are encountered. They contain a high amount of the necessary plant nutrients and are best for agricultural production. However, they represent only between 2 to 3% of the total area.

FIGURE 4: SOIL TYPE DISTRIBUTION IN LIBERIA



Source: EarthTime Inc.

## 4.5 Biological Environment

Liberia is among the nine different West African Countries straddled in the Upper Guinean Forest belt that stretches from western Togo to eastern Sierra Leone. This forest belt is considered as one of the highest global conservation priorities due to its high levels of endemism, species rarity and the extreme and immediate threat facing its survival.

### 4.5.1 Fauna and Flora

Liberia is home to approximately 150 mammal species, 590 bird species, 15 reptiles and amphibian species and over 1,000 insect species. Forest areas in Liberia were once known to host a wide range of animals including elephant, pygmy hippopotamus, buffalo, large primates and large hornbills; these species have largely disappeared due to hunting, farming and logging

activities.

Several antelope species that prefer patchy forest and regenerating forest/bush fallow areas are commonly reported in abundance in the interior. These include rare species such as Zebra and Jentik's duiker. Primates such as chimpanzees, three species of colobus monkeys, Diana monkey, various guenons and manabies are reported to be abundant in the mature secondary and primary forest. Wild pigs and porcupines exist in sparsely settled areas, and several members of the leopard group are also found.

The Leatherback turtles (*Demochely Coriacoa*) are critically endangered and along with the olive ridley (*Lepitochely olivacea*), Green turtle (*Chelonia mydas*), Loggerhead turtle (*Caretta Caretta*) and Hawksbull turtle (*Eretmochelys imbricate*) are found on Liberia's beaches. The sea turtles are widely hunted while nesting and are occasionally caught in artisanal fishermen's net.

There are over 2000 flowering plant species, with 59 of them endemic to the country and one endemic genus. Among the plant species, 240 timber species are known to inhabit Liberia's forest

#### **4.6 Socio-economic Environment**

Poverty remains widespread in Liberia and is on the rise. With a gross national income per capita of just US\$600 in 2018, Liberia is among the ten poorest countries in the world. According to the 2016 Household Income and Expenditure (HIES) survey data, more than half of the population (50.9 percent) was living in poverty. Poverty was more than twice as high in rural areas (71.6 percent) as in urban areas (31.5 percent). The national headcount poverty rate increased to an estimated 55.5 percent in 2019, reflecting negative per capita GDP growth rates and rising inflation.<sup>1</sup> Nonmonetary poverty indicators, including access to healthcare, education, and basic utilities, are also low by regional and international standards, with especially acute rural/urban and gender disparities.

Employment in Liberia is largely informal, most of it in the form of self-employment in agriculture or unregistered non-farm enterprises. Youth and women are more likely to be in the informal sector compared to non-youth and men. The 2016 household survey data puts the percent of female workers and youth workers in the informal sector at 95 percent and 97 percent, respectively.

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<sup>1</sup> World Bank. 2020. The COVID-19 Crisis in Liberia: Projected Impact and Policy Options for a Robust Recovery. World Bank, Monrovia.

The majority of the working age population in Liberia is in the labor force and employed, but most workers depend on precarious low earning jobs in the informal sector. Generally, women are less likely to work than men and are also mostly likely to be in vulnerable forms of employment and low productivity activities. Job opportunities are scarce in Liberia. Most Liberians, including the vulnerable population, lack access to good job opportunities that offer good and sustainable earnings. It is estimated that three out of every four Liberians are self-employed in agriculture, constituting about 36 percent of all employment, while non-agriculture activities account for about 40 percent of all employment. Only 20 percent of workers have access to wage employment, which tends to provide higher and more stable earnings. The vulnerable households on the other depend largely on non-farm enterprises. It is estimated that about two third of all vulnerable households own non-farm enterprises, and these enterprises in general tend to have low revenues and profits.

Urban areas in Liberia including Monrovia are faced with infrastructure challenges, and vulnerable households tend to be hit the hardest. Because of their low-income situations, vulnerable households tend to live in exposed areas with worse infrastructures. The project will address some of these challenges by focusing on community development activities that help create shaded areas, strengthen infrastructure to protect living areas and water supply from climate induced disasters, while providing employment opportunities for unemployed youth.

#### **4.6.1 COVID-19 Pandemic and the Economy**

The negative impacts of COVID-19 on economic activities and especially the informal sector threaten the livelihoods of poor and vulnerable households in Liberia. Vulnerable households are defined here as those whose consumption levels fall in the three bottom quintiles of the population.<sup>2</sup> In urban areas, vulnerable households depend significantly on non-farm enterprises (NFE) for livelihoods. Some 26 percent of urban households in the poorest quintile depend exclusively on non-farm enterprise income, with another 8 percent depending on farming and NFE income. For households in the second and third quintile, these numbers reach 33 and 4, and 38 and 3 percent respectively. Between 13 and 23 percent of urban households combine wage and non-farm enterprise work. In rural areas, vulnerable households depend largely on farming, but about twenty percent rely on a combination of farming and non-farm enterprise income.

Rising COVID-19 cases in major crop producing areas are hindering farming activities, limiting food market activities, and disrupting transport systems, and are raising food insecurity in Liberia. Although urban areas, by virtue of population density, have seen more infections, rural areas are not insulated from the impact of COVID19. Disruptions to the production of rice –

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<sup>2</sup> Given that national poverty rates reached 55 percent in 2019 and may well have increased since, it is reasonable to count the bottom 60 percent of the population as poor and vulnerable. Since poverty is higher in rural than in urban areas, higher share of rural households will be below the national 60 percent cut-of than in urban areas.

Liberia's main staple food – as well as cassava production is contributing to food shortages and subsequent increases in the prices of staples consumed by the poor and vulnerable. Liberia is also highly dependent on imported food products. Increases in food prices – the major expense for poor and vulnerable households – underpin the expected increase in poverty rates.

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## 5. IDENTIFICATION OF POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

Under Component 1, the project will support business maintenance and recovery/development with grants and training to existing vulnerable informal small businesses. It will also provide technical support and grants to new small businesses in the informal sector in urban areas (in the second phase of the project). The component will also finance a range of support services, including business skills and development training, and mentoring and will actively promote engagement of women in higher productivity (sometimes referred to as ‘male-dominated’) sectors to promote higher earnings among women. Under Component 2, the project will provide temporary employment for vulnerable workers struggling to find gainful employment and opportunities during and after the COVID-19 crisis through community-based public works activities. These activities are less likely to generate any significant negative environmental and social risk and impact. However, the risk of vulnerable groups or individuals to be excluded from benefiting from project, GBV issues, and inadequate stakeholder consultations are among the potential risks. The public works component has the potential to generate occupational and community health and safety issues, and health risk associated with COVID-19.

### 5.1 Potential Environmental and Social Risks and Impacts

Overall, the project is expected to have beneficial environmental impacts because the emphasis on supporting types of activities will be not on just minimizing negative environmental impacts but also promoting enterprises that will have positive impacts. The beneficial impacts will include cleaner air and improved aesthetics in the beneficiary cities, improved hygiene condition, flood reduction and better quality of the environment as a result of improved waste management and decline in the prevalence of diseases whose transmission is linked to poor sanitation.

However, several environmental issues could arise from activities that may use environmentally damaging technologies and resources for mainly the activities involved in Component 2, it may affect the environment adversely. The risks emerging from these activities (including public work, livelihood and value-addition activities in the agriculture sector) are likely to range from pollution of land, ground and surface water (if wastes are improperly disposed of), air pollution/climate contamination (burning of disposed wastes/GHG emission from decomposing waste at waste disposal sites) and harm towards animal and marine life through contamination of the food chain.

The project will target mainly vulnerable group of people, including women and unemployed youth. Because of the characteristics of the project beneficiaries, especially women, they are

likely to be exposed to sexual exploitation, abuse and harassment (SEA/H) by project implementation staff during recruitment and project implementation, as well as by authorities during official businesses transactions. There is also the risk of low participation of women, girls and the most vulnerable-disabled and elderlies due to the family responsibilities such as taking care of siblings and handling household tasks. The risk of “elite capture”. For project of this nature, there are always possibilities of the project tumbling to “elite capture” in which resources will be directed to benefit few individuals and v) emergence of social conflict resulting from favoritism and lack of transparency In light of the COVID-19 pandemic, beneficiaries may be expose to contracting the disease if protocols are not properly observed.

#### **5.1.1 Labor, Working Conditions, Community Health and Safety Risks**

The project will finance small-scale rehabilitation and construction activities. These are inherently low risk activities. However, in view of the COVID-19 situation, the risk of contracting COVID-19 for project workers and project staff may increase due to the need for working in close proximity, if the required protocols are not strictly adhered to. Health and safety risks associated with the use of hand-held tools in the execution of the labor-intensive public works under Component 2 are additional concerns that will need to be addressed. Given the project will target mainly vulnerable groups, the risk of discrimination and unfair treatment of beneficiaries does exist.

The GBV/SEA/SH risk of the project is rated as Moderate. Given the nature of the project activities, vulnerable women will be brought into close proximity to authorities and project workers who, relatively, have enormous power and authority. This obvious power imbalance has the propensity to expose vulnerable women to exploitation, and female beneficiaries may be targeted for GBV/SEA/SH by the implementing staffs and public authorities.

#### **5.1.2 The Risks of Environmental Pollution**

Considering the activities that will be financed under Components 1 and 2, including the provision of grants, training/employability development and provision of temporary jobs through labor-intensive public works, it is likely that some of these activities could generate pollution that could affect environmental media (air, soil, and water) as well as human health, if proper care is not taken during the selection of activities to be financed. Improper disposal of wastes generated during the public work activities could pollute environment. Small business funded under the project might engage in activities that may have detrimental effect on the environment. So, proper care will need to be taken to ensure that such businesses (for example, those involved with the use of hazardous chemicals and pesticides as well as those that promote the unsustainable use of forest resources such as production of charcoal) are excluded from project financing.

### **5.1.3 The Risk of Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The project will finance activities that are not likely to require land acquisition and involuntary resettlement. However, given the nature of informality of many settlements in urban areas, the project may cause restrictions to land use under component 2. However, these restrictions, if any, are expected to be temporary, lasting only for the period of the public work activity that may have caused such restriction. In addition to this ESMF, the project has updated the RPF developed under YOP to account for these scenarios and guide the preparation of specific plans if need be.

### **5.1.4 Potential Risks and Impacts on Biodiversity and Living Natural Resources**

The project may affect biodiversity and/or living natural resources in case project funds businesses/natural resource-based enterprises that uses timber/wood-based fuel, farming etc. Project activities could promote the unsustainable use of living natural resources if provisions are not included in the project design to exclude such activities. For example, if natural resource-based enterprise such as charcoal production is financed under the project, this could affect both the forest cover and other biodiversity. Activities such as this will need to be included on the negative list of the project.

### **5.1.5 Potential Risks and Impacts to Cultural Resources**

**Component 2** of the project will finance Labor-intensive public works in urban areas. These activities will involve development of small-scale infrastructure as well as small-scale maintenance works. The likelihood of encountering cultural resources during execution of these activities is very low because of the small-scale nature of the activities and the environment where they will be implemented. A Chance Finds Procedure has been incorporated in the ESMF in Section 9 to ensure that the potential risks and impacts to cultural resources are mitigated. Additional mitigation measures are also provided in the generic ESMP, covering both tangible and intangible cultural resources.

## **5.2 Mitigation Measures**

During project implementation, a number of measures will be instituted to ensure that the project potential risks and impacts are mitigated. The measures will include but not limited to the following:

- (i) During implementation, ensure that subproject activities are screened and appropriate site-specific actions plans are developed to address issues related to OHS and community health and safety, pollution, waste management, etc.
- (ii) Ensure the participation of the vulnerable, disadvantaged and women groups in project planning, decision making as well as access to project opportunities, and that selection of these disadvantaged people get prioritized over others through a differentiated

- approach so that the terms and conditions of selection are cognizant to their social standing and vulnerable background.
- (iii) The PMT will develop an “exclusion list” to exclude high risk and environmentally detrimental activities from being financed under the project.
  - (iv) Ensure that contractor staff and project beneficiaries participating in or involved with the public activities have appropriate PPEs and training and should be required to follow COVID-19 related social distancing measures and protocols. Provision of symptom reporting and medical evacuation also must be in place in case symptoms are seen in any workers.
  - (v) Design measures will be taken to account for universal access philosophy, including access to information, process to raise grievance and other issues.
  - (vi) SEA/H action plan to be developed and implemented throughout the lifecycle of the project.
  - (vii) Code of Conduct for project workers to be developed and widely disseminated to project staff and staff of contractors. The project has developed Chance Finds Procedures (Section 12 of the ESMF) to manage the risk of chance finds. This will be further elaborated in the ESMP and disseminated to project staff and contractors’ staff.

In addition to the general mitigation measures outlined above, the following specific measures will be taken to address the project risks and impacts identified in Section 5.1.:

#### Measures to Mitigate Labor, Working Conditions, Community Health and Safety Risks

To mitigate the risk of COVID-19, the project will need to give priority to the guidelines for physical distancing, use of masks, hand washing practices. Young project beneficiaries who are less likely to follow the protocol will need to be continuously monitored, trained motivated. The project will also need to ensure that protocols are enforced and abided by all project staff and beneficiaries. A Grievance Mechanism (GM) specifically addressing labor needs for raising concerns about the project will be developed and implemented throughout the project. To further mitigate the risks, the project has developed a Labor Management Procedure that will be implemented throughout the life of this project.

Several activities will be undertaken to manage the GBV/SEA/SH risks, including the following:

i) increasing awareness on SEA/SH issues, ii) requiring the signing and adhering to Code of Conduct (CoC) as mandatory for implementation staffs and public authorities associated with the project, iii) regularly sensitizing, briefings/training/workshop to educate people about consequences/disciplinary action for violating the CoC and committing GBV/SEA/SH. To avoid any such happening, the MYS/LACE shall develop mitigation measures/management plan and hire a Social Safeguards Officer with GBV expertise and work with specialized organizations to manage risks, i.e. GBV service providers as required and recommended. Project GRM will include specific provisions to address issues related to SEA/SH. All Project workers including

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beneficiaries will undergo sensitization building measures as well as training related to GBV/SEA/SH.

#### Measures to Mitigate the Risk of Pollution

Given the nature of the project comprising grants, training/employability development and provision of temporary jobs, it is likely that some of the project beneficiaries including funded small businesses could generate pollution (air, water, land, human, construction and medical wastes). To mitigate these risks, a screening criteria and eligibility mechanism will be developed to ensure that no businesses are funded by the Project that may potentially have negative impacts on the environment. The updated POM will include a negative list of interventions/businesses that will not be approved for funding. For activities that will be funded, the project will develop an ESMP to ensure that proper mitigation measures are designed and implemented.

#### Measures to Mitigate the Risk of Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Activities requiring land acquisition and involuntary resettlement will be included on the project negative list. These activities will not be financed under the project. The project has updated the RPF developed under YOP to manage the risk associated with temporary restriction to land use resulting from project activities.

#### Measures to Mitigate Project Risks and Impacts on Biodiversity and Living Natural Resources

The ESMF have provisions in Annex 4 not to adversely affect biodiversity, habitats as well as promote sustainable management of living natural resources by natural resource-based enterprises. To further mitigate this risk, activities that have the potential to adversely impact the biodiversity will be included in the negative list. The project will also develop ESMP for activities that will be financed to ensure that the impacts are identified and appropriate measures are designed to address them.

#### Measures to Mitigate Project Risks and Impacts on Cultural Resources

A Chance Finds Procedure has been incorporated in the ESMF in Section 9 to ensure that the potential risks and impacts to cultural resources are mitigated. The Chance Finds Procedure will be widely disseminated to all project staff and contractors, and use throughout the life of the project. The project will take the following additional measures to further mitigate the project potential risks and impacts on cultural resources:

If a subproject intends to use cultural heritage of any project affected parties (including individuals and communities) for commercial purposes, it will inform the project affected parties of: (a) their rights under national law; (b) the scope and nature of the commercial development and the potential impacts; and (c) the potential consequences of such

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development and impacts. The subproject will not proceed with such commercial use unless it: (a) carries out meaningful consultation with stakeholders; (b) provides for fair and equitable sharing of benefits from commercial use of such cultural heritage, consistent with customs and traditions of the project affected parties; and (c) identifies mitigation measures according to the mitigation hierarchy.

## 6. ENVIRONMENTAL AND SOCIAL ASSESSMENT PROCEDURES

These steps are discussed in detail in the subsections below.

### 6.1 Step 1: Environmental and Social Screening

A screening of each proposed intervention or subproject should be undertaken. The PMT with assistance from the EPA will:

- a. Ensure compliance with the national EIA screening process with both the EPA and World Bank safeguards processes;
- b. Determine and formally agree with the EPA on the level of assessment required (e.g Project Brief or ESMP, full scale ESIA will be required) or whether a FONSI can be granted.

To facilitate this process, the PMT will develop a standard screening checklist form that incorporates:

- a. The Liberian national EIA Screening Form;
- b. Criteria that reflects the WB, including whether the site and proposed intervention presents risks to natural habitats, water quality and water resource availability and use, natural hazards, cultural property, involuntary resettlement, land acquisition and restriction on land use, and pesticide use;
- c. Process for checking whether the mitigation measures identified through the REALISE ESMF process apply; and
- d. Identification of stakeholders, including groups that may be affected by the project (to be appended to the checklist).

Information to complete the checklist may require field visits and key informant interviews. Following the screening, the PMT through its Environmental Safeguard Officer and Social Safeguard Officer who are to have oversight on the project operations, will prepare and submit a Notice of Intent and Project Brief consistent with requirement set out in the EPML to the EPA. In certain instances, and subject to EPA confirmation, completion of an EPA screening form may replace the Project Brief. If so, the screening form must be prepared by an EPA registered evaluator. Annex 3 provides a proposed template, along with other monitoring report templates.

### 6.2 Step 2: Environmental and Social Assessment Studies

The EPA reviews the Project Brief and makes a determination on the level of ESIA that is required. In some cases, this may be different than what is required by the Bank. For example,

the Bank has already rated this project as Substantial. Therefore, the project will be required to prepare and implement an ESMP during project implementation. However, the EPA may not require any further study after review of the Project Brief and could issue an Environmental Permit on the basis of the Project Brief. In this case, the project will still be required to prepare an ESMP that satisfies the World Bank's requirements. In all cases, the project is required to apply the more stringent of the two ESIA standards.

**Step 2A:** As per the processes outlined above, the PMT Safeguard Officers will prepare the ToRs for the ESIA or any level of required Environmental Assessment study/deliverables that may be required (e.g., preparation of a RAP, etc.). Recruitment or engagement of such service providers should follow EPA procedures for selecting consultants for Environmental Assessments and the selected consultant must be a registered environmental evaluator. The ToRs should include issues identified in the screening exercise including any requirement specified by the EPA as a result for that process.

The development of comprehensive ToRs is a key step in safeguard process, which will define the tasks required to undertake the ESIA and define the scope of outputs required. The ESMP should comply with requirements specified in ESS1 and identify:

- a. Potential E&S impacts related to siting, construction, and operation of the intervention;
- b. Mitigation and monitoring measures to address potential impacts;
- c. Responsibilities for monitoring ESMP requirements;
- d. Training and capacity-building requirements for project officers and communities;
- e. Estimated budget for mitigation monitoring and training; and
- f. Measures to ingrate the ESMP into the intervention's overall planning design budget and implementation.

The PMT will submit copies of the ESIA document as appropriate to the EPA.

### **6.3 Step 3: Approval**

In compliance with WB guidelines and Liberian EIA requirements, the applicable documents (ESIA, ESMP, and/or RAP) must be made available for public review before the commencement of implementing project activities, and must be at places accessible to local people (e.g. at county/district offices, EPA offices) and in a form, manner, and language that can be easily understood. The World Bank reviews and provides clearance to ESIA documents, while the EPA reviews and approves ESIA documents. After approval, the EPA issues Environmental Permits for implementation of the approved instruments. Permits are issued for a period of 12 months and need to be renewed as required. It is important to note that the EPA does not review or provide approval for ESMF. In Liberia, ESMF is purely an internal Bank document that does not

require EPA review or approval.

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## 7. INSTITUTIONAL ARRANGEMENT AND RESPONSIBILITY FOR IMPLEMENTATION OF PROJECT AND ESMF

The project will be implemented by the MYS and LACE. The MYS will be responsible for overall project coordination and implementation of Component 2 (Temporary Employment Support and Employability Development for Vulnerable Workers) while LACE will be primarily responsible for implementation of Component 1 (Grant Support to Vulnerable Households to Revive or Start Small Businesses)

The MYS will take the overall responsibility of ensuring the effective implementation of this project. MYS is in charge of the youth agenda and by virtue of job creation being at the top of this agenda, it has also played a leading role in rallying various governmental and non-governmental stakeholders on the issue of job creation. For effective implementation, MYS will outsource execution of one of the activities to LACE, which has more experience with interventions targeting micro- and small enterprises (SBS) under YOP. MYS has experience of implementing public works projects in Greater Monrovia under the Liberia Youth Employment Program (LYEP) and the Reclaiming Liberia's Beaches and Waterways Program. MYS will take the lead on inter-ministerial coordination with other government agencies relevant to the job creation agenda.

LACE has an established track record of delivering employment focused programs in Liberia. LACE is a not-for profit and autonomous agency, established by the GoL in 2004 and is accountable to the Executive Branch of the government. LACE's mandate is to improve living standards for poor communities while promoting community inclusive development processes. LACE has a history of implementing a series of employment projects financed by the World Bank, including the Community Empowerment Projects I and II, the Youth Employment Support Project (YES), and Cash for Work Temporary Employment Project (CfWTEP). More recently, LACE has been implementing SBS and a rural public works program under YOP.

**The Project Management Team.** Following experience of YOP, there will be a single PMT consisting of suitably qualified consultants hired by MYS and LACE to oversee the overall implementation of the project. The PMT will coordinate project implementation, including organizing regular Project Steering Committee meetings. The PMT will also be responsible for developing all guidelines, establishing appraisal mechanisms, and working collaboratively with the implementing agencies to ensure consistent and regular flow of information between internal and external audiences. The PMT will comprise coordinator, key technical staff, fiduciary officers who will be responsible for all financial management and procurement related

activities under the project, and safeguards specialists (an Environmental Safeguard Officer and a Social Safeguard Officer) to support, monitor and report on implementation of the Environmental and Social Commitment Plan (ESCP). Implementing entities will contract experienced/qualified non-governmental organizations (NGOs), local firms, or other organizations to support implementation of some aspects of the activities, especially those related to non-financial support provided to the enterprises, life-skills training and other support under the public works.

## 8. BUDGET FOR ESMF IMPLEMENTATION

Table 2 below describes the budget estimates for the implementation of the ESMF. The estimates are built on the assumption that some capacity was acquired from previous project experiences by LACE and MYS as such there will be minimal implementation of proposed mitigation measures based on experience of implementation of YOP. Capacity for safeguard support at the LACE has been developed over the years with successful implementation of similar World Bank financed projects such as the Community Empowerment projects I and II, and YOP which is ongoing.

The proposed budget is as follows:

TABLE 2: ENVIRONMENTAL MANAGEMENT PLAN BUDGET

No.	Activity/Item	Rate	Estimated Cost (USD)
1.	Salary for E&S Officers (Environmental Officer & Social Safeguard Officer) for the 3 years duration of the project	<u>\$1500/Month/Officer x 3 years</u>	\$108,000
2.	Preparation of project ESMP	\$25,000	\$25,000
3.	Preparation of RAP (if required)	\$15,000	<u>\$15,000</u>
4.	Safeguard training workshops	\$5,000/year x 3	15,000
5.	Monitoring and Evaluation of ESMF/ESMP	<u>\$5,000/year x 3</u>	<u>\$15,000</u>
<b>TOTAL</b>			<b><u>\$178,000</u></b>

## 9. MONITORING AND REPORTING OF ESMF IMPLEMENTATION

Monitoring is a key component of the ESMF during project implementation. It is essential that the basis for the choices and decisions made in the sub-project design and other E&S safeguard measures implemented are verified. Monitoring will verify the effectiveness of impact management, including the extent to which mitigation measures are successfully implemented.

Periodic monitoring of the general project and the specific sub-project activities will help to:

- Improve environmental and social management practices;
- Check the effectiveness of the implementing entities' safeguard oversight responsibilities
- Identify project problem areas at a very early stage for quick intervention.
- Provide the opportunity to report the results on safeguards, impacts and mitigation measures implementation in time.

Some environmental monitoring indicators to assess the effectiveness of the institutional arrangement, and also mitigation measures implemented are suggested in the Table 3 below.

TABLE 3: ESMF MONITORING INDICATORS

Activities/Issues	Monitoring indicators
Preparation of site-specific plans (ESMPs)	Site-specific plans prepared prior to commencement of project activities as required
Regulatory compliance issues	EPA's approval/permits obtained as required
Grievances	Number of grievances resolved in the stipulated timeframe
Training and awareness	Number of awareness sessions on GBV issues Number of project beneficiaries attending these sessions
Safety of the public	Number of reported cases of accidents involving general public and related to works.

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## 10. STAKEHOLDERS CONSULTATIONS

A Stakeholder Engagement Plan (SEP) has been developed by the Government of Liberia through its project implementing entities (MYS and LACE) to maintain and ensure the process of continuous engagement with the different stakeholders during implementation of REALISE project. The process of engaging stakeholders is important for successful implementation and attaining the goal of the project.

The SEP provides a framework for stakeholder engagement throughout the life of the project cycle (identification, preparation, appraisal, negotiation, implementation, completion). The SEP has been designed so that the project can demonstrate engagement that is effective, meaningful, consistent, comprehensive, coordinated and culturally appropriate in line with ESS10 objectives and requirements, all the relevant Liberian legal and regulatory frameworks, and good international industrial practice. Specific objectives of the SEP include the following:

- To establish a systematic approach to stakeholder engagement that will help the Government of Liberia, through its project implementing entities, identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project, and to enable stakeholders' views to be considered in project design and environmental as well as social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks, and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow the MYS and LACE to respond to and manage such grievances.

The project has identified three broad categories of Project stakeholders 1) project beneficiaries, 2) implementing agencies, and 3) other stakeholders. REALISE considers beneficiaries and project affected groups to be primary stakeholders, whilst implementing stakeholders includes implementing government ministries, development partners, Counties, sector offices and agencies, training and education institutions; and other.

The SEP has identified, in the table below, a comprehensive list of stakeholders who will be

consulted during the preparation of the ESMP and other E&S related documents.

TABLE 4: LIST OF STAKEHOLDERS AT DIFFERENT LEVELS BY PROJECT COMPONENT

<b>Project Component</b>		<b>Stakeholders at National, county and district Level</b>		
<b>Component</b>	<b>Subcomponent Description</b>	<b>National level</b>	<b>County/City</b>	<b>District/Community</b>
Component 1: Grant Support to Vulnerable Households to Revive or Start Small Businesses	i) Business maintenance and recovery/development grants and training to existing and vulnerable (temporarily closed or at risk of closure) informal small businesses; ii) Technical support and grants to new small businesses in the informal sector in urban areas (in the second phase of the project); iii) Actively promote engagement of women in higher productivity (sometimes referred to as 'male-dominated') sectors to promote higher earnings among women.	LACE, MYS, MCI, LIBA, LMA, LRA, MIA, WB, and other development partners	CSC, CBOs, and City Corporation	Community Leaders, Targeted beneficiary communities, unemployed youth, women groups, Association of People with Disabilities
Component 2: Temporary Employment Support and Employability Development for Vulnerable Workers	i) Labor-intensive public works to smoothen consumption and facilitate reentry into productive employment while improving environment for the poor and vulnerable in urban areas; ii) Life Skills and Employability training (personal initiative, leadership, self-efficacy, confidence, time management, basic financial literacy, sexual and reproductive health, sexual exploitation, abuse and	MIA, MPW, NCD, EPA, MOL, MYS, LACE, WB, and other development partners	CSC, City Corporation s, CBOs	Target beneficiary communities, unemployed persons, women groups, and Association of People with Disabilities

	harassment at the workplace, and COVID-19 related material)			
Component 3: Program Implementation, Capacity Building and Coordination	<p>i) Government and other actors’ capacity strengthening for the coordination, design, and implementation; ii) Administrative, technical, and financial management of the project by PMT; iii) Coordination among all institutional partners to ensure the efficient flow of information among all actors and coordination with the private sector; iv) Establishment of monitoring and evaluation mechanism of the project’s results and impact; v) development of communication activities to publicize and disseminate project results, best practices, and success stories; and vi) Studies and impact evaluations</p>	MFDP, MYS, MIA, LACE, WB, and other development partners	CBOs, NGOs	The media, CBOs, local leaders

This ESMF is an update of the ESMF developed for YOP. As part of the ESMF updating process consultations with stakeholders involved in project implementation and regulatory functions, community representatives including potential project beneficiaries, and other stakeholders from the academia and private sector were conducted in Greater Monrovia. The Project Management Team of YOP held Stakeholder consultations from January 5-6, 2021 intended to inform policy makers about upcoming project (REALISE) and solicit relevant information that would aid successful implementation.

The consultations were focused on providing information and receiving the concerns and opinions of the participants regarding the overall REALISE program objectives, its main

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components and in particular the LIPWs subcomponent for which the ESMF was prepared and updated. A presentation of the project components including LIPW subproject types and the associated draft ESMF procedures were made to the consultation participants and discussions were conducted to identify existing practices, strengths, weaknesses, institutional capacity gaps and other constraints to implement the procedures. Interviews were also conducted with the agencies involved in carrying regulatory functions during implementation of the REALISE ESMF procedures (Ministry of Commerce and Ministry of Labor). PMT held meetings with the Federation of Liberian Youth, the National Disabilities Union of Liberia. Further consultations will be conducted with local leaders, project beneficiaries, international NGOs, relevant government institutions, etc. The table below summarizes key issues raised by the participants.

TABLE 5: STAKEHOLDER CONSULTATIONS HELD DURING PREPARATION OF ESMF AND KEY OUTCOMES

No.	Name of Participant	Name of Institution	Position	Comments	Date of Consultation
1.	Mr. Amos Williams	Federation of Liberian Youth	President	The Public works aspect of REALISE should be implemented through a Service Provider and supervised by the MYS. Secondly, implementation should also include a saving scheme to enhance sustainability after the project phases out.	Jan. 5, 2021
2.	Mrs. Naomi Harris	National Disability Union of Liberia	Executive Director	She expressed gratitude to the organizers for said project intended to help vulnerable youth, however, implementation must be through an institution/ local NGO to ensure timely implementation and accountability.	Jan. 5, 2021
3.	Mr. Daniel Dargbeh	National Disability Union of Liberia	Program Manger	Recruitment of people living with disability must be considered and their organization can make available the number of disable needed for the project.	Jan. 5, 2021
4.	Mrs. Ellen Sonpon	National Disability Union of Liberia	Finance Director	Her organization is willing to work with the implementation team to ensure participation of people living with disability on the project.	Jan. 5, 2021
5.	Mr. Aurelius Butler	Ministry of Gender, Children and Social Protection	National Coordinator for Liberia Social Safety	The National Coordinator said, the Ministry can allow integration of the YOP MIS, as well as REALISE, but will require data synchronization. The system will be adjusted to align with the functionalities of the LSSN as their system currently has two	Jan. 5, 2021

			Net	backups used for disaster recovery. He also mentioned that the LSSN system will be upgraded with additional module to include bi-metrics, Geo-spatial and will be launched on Jan. 15, 2021.	
6.	Mr. Otis Wreyou	Ministry of Labour	Director of National Bureau of Employment	Issuance of beneficiaries' contract/MOU before project commencement as a way of safeguarding the Donor and implementing partners. Besides, the project should include Roadside brushing as it enhances sanitation of urban areas.	Jan. 6, 2021
7.	Abayomie Cooper	Ministry of Labour	Assistant Director for Bureau of Employment	Project beneficiaries should include single mothers, widows and willing to provide leadership role in project implementation.  Aside from these, he mentioned that the approved wage for unskilled labourer is USD\$4.50 hence, REALISE should be in full compliance.	Jan. 6, 2021
8.	Ms. Philomena David	Ministry of Commerce	Assistant Director for Access to Market	REALISE should incorporate more existing businesses than new ones.  Business registration and tax receipts must be requirements for existing business into the program. This will enhance government's capacity to generating more revenues.  Ms. David also cited registration fees for businesses in three categories (A, B and C): Category A: concrete structures; LRD\$2,400.00, B. mis-shift structures; LRD\$1,200.00 and C. Street vendors; LRD\$480.00.	Jan. 6, 2021

9.	Nathan Gibson	Ministry of Commerce	Research Analyst	<p>Labour subsidies under the public works should be taxable.</p> <p>Inclusion of saving and loaning schemes among beneficiaries to enhance sustainability after the project faced out.</p>	
10.	Henry Boway	Ministry of Commerce	Administrative Assistant	<p>Recommended single business instead of group business. Group business don't work in Liberia.</p> <p>Relative to market linkage, the MOC is currently working with developmental partners to complete the 3<sup>rd</sup> floor of the Gbogbe Town Market building where beneficiaries can use for business purpose.</p>	

## 11. GRIEVANCE REDRESS MECHANISM

REALISE is a multifaceted project having multiple interventions that are mostly expected to have positive impacts in addressing urban poverty and unemployment in the target communities and the country at large. While considerable efforts have been made to include social and environmental risk management in the design and implementation of the project in order to minimize and prevent potential adverse impacts, there is always a possibility that interests of some individuals, groups and institutions may still be negatively affected by the activities of the project.

Typical grievances that are anticipated from the implementation of REALISE project subprojects include claims and complaints about targeting/recruitment and selection of project beneficiaries (inclusion, exclusion), lack of transparency on cash transfers and payments, poor service delivery including delays, unfair treatment by service provider/project staff and discrimination based on sex or other physical and health conditions. Restrictions on land use, loss of property, disruption of access paths, corrupt practices, human rights violations, child labor, and gender-based violence and sexual exploitation and abuse are among the potential grievances that may arise during implementation of subprojects.

Such instances may generate complaints from individuals, groups and institutions that may be affected. Therefore, a well-defined, clear and transparent system for receiving, recording and resolving potential concerns and complaints that may arise from project-affected persons is an essential and necessary mechanism to provide remedies to grievances early enough to avoid unnecessary project implementation delays and obstructions.

In this regard, the project will strengthen the Grievance Redress Mechanism that was established under YOP to be used for the REALISE project. The Grievance Redress and Management Committees, which were established at project communities, and county levels will be reorganized and adequately capacitated to support implementation of REALISE. The GRM will also be extended to the national level and be expanded to handle all types of grievances arising from implementation of all the project related grievances. The GRM will have dedicated focal persons at the community, county and national levels responsible for grievances coming from different components of project implementation.

The GRMs will be promoted as much as possible as part of a communication campaign and trainings will be provided to beneficiaries of the project so they are aware of channels through which they could voice their grievances and complaints.

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**Component 1: Grant Support to Vulnerable Households to Revive or Start Small Businesses**

Given that the project involves different actors, including job seekers, firms, service providers and government institutions, there is a wide range of scope for grievances to occur throughout the project cycle. Job seekers and firms could hold grievances and voice complaints at different stages of the project cycle, including at selection.

**Component 2: Temporary Employment Support and Employability Development for Vulnerable Workers**

In the case of LIPW beneficiaries, the community level GRM will be the first opportunity for resolution of grievances through discussion and mutual agreement between the project-affected persons and members of GRM committees. Community level GRM committees will facilitate receiving, recording and resolution of grievances at their project site through a designated member (focal person) of the committee. The LIPW beneficiaries will be sensitized to put forward their grievances or concerns about anyone or anything related to the project through appropriate channels of their choice which will include:

- (i) Face- to-face meetings with GRM committee members, county level staff, and national staff during visits to their project site
- (ii) Grievance boxes and desks
- (iii) Written letters, E-mail (to be established) or SMS (3344) and hotline (3344) services.

Upon receipt of the grievance, the Community Grievance Redress Committee shall assess the grievance to establish whether it could be resolved locally or needs to be referred to the next level. Where possible, the Community Grievance Redress committee shall attempt to resolve and close the matter if the complainant is satisfied with the resolution. Where the matter has failed to be resolved or where it is deemed to be beyond the capacity of the Community Grievance Redress Committee, the matter shall be referred to the county level Grievance Redress Committee or another relevant institution for further redress. The complainant will be informed, and the determination will be appropriately recorded in a grievance register, as part of the project's Management Information System (MIS). Upon receiving a written referral from the county/community GRC, the County GRC shall also attempt to resolve the matter by convening concerned parties where possible. The same process will be repeated with further referral levels until the case is resolved.

At the national level, the PMT will establish a system for the receipt, recording and referral of complaints and grievances. This will include a dedicated SMS complaints number, an online platform, and a toll-free line (3344) through which beneficiaries and firms may lodge

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complaints. The PMT will dedicate an officer to manage the receipt, recording and referral of complaints and grievances. The officer may refer the complaints to the service providers or to relevant county offices for redress.

For cases that have been referred previously but have not been resolved, the officer may escalate these directly to the County Steering Committee (CSC) for review and resolution. The CSC will have, among others, a youth and private sector representative. Through this representation, general cases of complaints and feedback from existing youth representation structures (youth groups, committees, etc.) and private sector associations may be brought directly to the CSC for discussion and resolution.

At the local level, the community/County Grievance Redress Committee (GRC) will be the human entry point for all grievances and complaints. A committee at local level referred to as Community Oversight Committee (COC) will meet at least once a week to review and discuss complaints as deemed necessary. If it is an administration or policy related complaint, it is referred to County office.

This process is overseen and guided by the project officer responsible for grievance redress. The Officer will oversee training, information, and supervision to make sure the focal persons and the GRM committee are capacitated to receive, review and process complaints. In addition, when complaints are referred to the county level, county offices will provide a solution if possible. If this is not possible, the county office will forward the complaint to the PMT.

The GRM at the national, county and community levels, the system that will be used for the receipt, recording and referral of complaints and grievances need to be integrated with the MIS. Complaints received directly through the toll-free line (3344) will be provided for the beneficiary to forward their issues. Moreover, a member of GRM at Community /County level will collect all type of grievances from beneficiaries of the various components. SMS or online mechanisms will be recorded directly into national level MIS and referred for resolution by the relevant offices.

A grievance mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns.

The GBV risk assessment of the project is rated as Moderate. The project plans to reduce gender gap and provide opportunities for women for training/work skills development in close proximity of males therefore raise concerns for GBV/ SEA. These activities are likely to expose project women beneficiaries and workers to sexual exploitation and abuse as well as sexual harassment. Therefore, the project GRM will integrate GBV-sensitive measures, including

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multiple channels to initiate a complaint and specific procedures for SEA/SH, such as confidential and/or anonymous reporting with safe and ethical documenting of SEA/SH cases. Unlike other cases, the project GRM will not investigate or resolve SEA/SH cases or provide redress to survivors. The role of the GRM will be to:

- (i) Treat the complainant with dignity and respect using a survivor-centered approach
- (ii) Refer the complainant to GBV service providers (i.e. healthcare, psychosocial support, legal aid) and the domestic legal system at survivor's choice
- (iii) Record only limited information about the incident to protect identity and dignity
- (iv) If the survivor chooses (after being given complete information), inform the PIU/project of the incident to assess perpetrator accountability

Key to this process is the identification of GBV service providers. The project will identify GBV service providers in Monrovia and its environs. The project will identify key services such as health care, psycho-social support, and legal aid/domestic justice system that exist in the project area. Other services to be identified will include livelihood support, shelters and case management. The project will provide special training for staff responsible for managing SEA/SH cases.

## 12. CHANCE FINDS PROCEDURES

Chance finds are defined as physical cultural resources encountered unexpectedly during project implementation. Chance find Procedures include provisions for managing aforementioned encountered chance finds. **Component 2** of this project will finance Labor-intensive public works (LIPW) in urban areas. These activities will involve development of small-scale infrastructure as well as small-scale maintenance works. The likelihood of encountering cultural resources during execution of these activities is very low because of the small-scale nature of the activities and the environment where they will be implemented. For precautionary purpose, this simplified Chance Finds Procedure has been developed to guide the public works activities. The following steps will be followed when a Chance Find is encountered:

- In the case of chance find of any sites or artifacts of historical, cultural, archeological or religious significance all construction activity in the vicinity of the find/feature/site will cease immediately.
- The discovery will be clearly delineated and secured, and all found remains will be left in situ.
- The contractor responsible for the site will immediately notify the Coordinator of the Project Management Team. The Coordinator of the Project Management Team will then notify the relevant national authority immediately of the discovery.
- The relevant national authority will take charge of the of the finding, and institute the appropriate course of actions, including proper documentation, removal, and storage.
- An on-site finds storage area will be provided, allowing storage of any artifacts or other archaeological material recovered during the process.
- Work will only resume after the relevant national agency has completed its work, and has given instruction to the Project Management Team for Work to resume. The contractor will then receive instruction from the Project Coordinator of the Project Management Unit or his/her designated officer to resume work.

This Chance Find Procedure will be communicated to all contractors, as appropriate. An updated version this Chance Find Procedure which should include contact details of relevant agency and contact persons of the Project Management Team. Documentation of any Chance Find and its significance shall be shared with the contractor to raise awareness.

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## 13. LABOR MANAGEMENT PROCEDURE

### 13.1 Introduction

The primary objective of the World Bank's Environmental and Social Standard (ESS 2) on 'Labor and Working Conditions' is to promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly while also providing them with safe and healthy working conditions. Specific objectives embedded in this general objective include:

- To promote safety and health at work.
- To promote the fair treatment, nondiscrimination and equal opportunity of project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labor and child labor.
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- To provide project workers with accessible means to raise workplace concerns.

Accordingly, the purpose of this Labor Management Procedure (LMP) is to facilitate the planning and implementation of the project by identifying the main labor requirements and the associated risks and to determine the resources necessary to address the project-related labor issues. The LMP also sets out general guidance relevant to different forms of labor issues and concerns that relate to this project.

### 13.2 Project Overview of Labor Use

**Number of Project Workers:** The project will attract considerable number of workers given the high unemployment rate in Monrovia and its environs. The total number of workers to be employed on the project is not known at this stage. However, it is estimated that the Component 2 is expected to hire at least 12,000 community workers. Several staff (direct workers) will be hired on the PMT for the day-to-day running of project activities. Similarly, Component 1 will also require the services of a number of service providers. Therefore, it could be estimated that between 12,000 to 12,500 workers will be hired throughout the lifecycle of the project.

**Types of project workers:** Implementation of the REALISE project will involve different categories of workers for different project activities. ESS2 classifies project workers into the following four groups: (i) direct workers, (ii) contracted workers, (iii) primary supply workers, and (iv) community workers. As per this classification and labor needs of this project, all these groups of workers are applicable to this project.

The following categories of workers are expected to be key in the response activities:

### **Direct Workers**

#### **Project Implementation Unit (PMT)**

These are workers that are expected to work directly on the project management team. This team is responsible for overall project management with oversight responsibility on fiduciary (financial management, procurement and disbursement) environmental and social, gender-based violence (GBV), and sexual exploitation and abuse (SEA) issues. The PMT will have several staff, including a Project Coordinator, Procurement Officer, Financial Management Officer, Monitoring and Evaluation Officer, Environmental Safeguards Officer and Social Safeguards Officer. The Social Safeguard Officer who will be responsible for the project Grievance Redress Mechanism, SEA/H action plan required under the ESCP and other social safeguard issues. These positions are required for the full duration of the project.

#### **Short Term Technical Staff**

In addition to the positions required for the full duration of the Project, the Project may directly hire other technical staff for limited duration based on specific needs.

All these staff, including the civil servants assigned to serve on the PMT, are considered as direct staff of the project under ESS2 and the respective standards/provisions will apply. However, the civil servants assigned to serve on the PMT, whether full-time or part-time, will be bound by their existing public sector employment agreement or arrangement, and provisions under this LMP will not apply to such parties. However, their health and safety needs as required under ESS2 will be considered, and the measures adopted by the project for addressing occupational health and safety issues, including those specifically related to COVID-19, will apply to them.

**Contracted Workers:** A contracted worker is a worker employed or engaged by a third party to perform work or provide services related to the core functions of the project, where the third party exercises control over the work, working conditions, and treatment of the project worker. Component 1 of the project will require the services of a number of service providers. Some of the workers hired under this component will fall in the category of contracted workers.

**Primary Supply Workers:** These are workers employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. It is required that the goods or materials be provided directly to the project for its core functions on an ongoing basis in order to be considered as a primary supplier. Given the activities that will be financed under this project, the workers who will be hired on the project will mostly be community workers and direct workers.

**Community Workers:** The Projects will include the use of community workers in circumstances defined in paragraph 34 of ESS2. The LIPW beneficiaries will be community workers engaged in small-scale community-based public works subprojects. The number of community workers will vary throughout the project lifecycle. It is estimated that the project will hire at least 12,000 workers under this component. Additionally, the project is designed and conducted for the purpose of fostering community-driven development. The project will develop criteria for beneficiary selection to ensure fair recruitment of community workers.

**Migrant workers:** The project is not expected to hire some migrant workers- local or international. The project as designed is expected to recruit most of the workers from Montserrado County particularly Monrovia, where project activities will be carried out, and other parts of the country.

**Timing of Labor Requirements:** The project is still in the early stage of preparation, and the timing and sequencing of labor on the project is not defined at this stage. However, the direct workers (PMT staff) will be required full time and around the year for the project duration. Some other workers such as experts/consultants will be hired on demand basis throughout the project lifecycle. The timing for recruitment of community workers is not known at this stage. However, it is expected that 60 days of labor will be guaranteed under the public works component. Once the project is approved and the overall procurement plan which includes the public works sub-projects is finalized, the LMP will be updated accordingly to include additional information on the timing and sequencing of labor.

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### 13.3 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

#### Project Activities and Key Labor Risks

The project has four components including the following (i) Component 1: Grant Support to Vulnerable Households to Revive or Start Small Businesses, (ii) Component 2: Temporary Employment Support and Employability Development for Vulnerable Workers, (iii) Component 3: Capacity Building and Project Implementation and Coordination, and (iv) Component 4: Contingency Emergency Response Component.

Based on the description of the activities the project will finance, there will be no civil constructions hence the scope for labor influx and associated risk are unlikely. Component 2 will support temporary employment support and employability development for vulnerable workers struggling to find gainful employment opportunities in the aftermath of COVID-19 crisis. The component will involve labor-intensive public works and mostly workers selected from the local communities will be involved. Given the need for close physical proximity in providing services to the poor beneficiaries who have very limited access to technology, existing COVID-19 situations could pose obstacles. Guidelines for physical distancing, use of protective equipment/sanitation/hygiene practice will need to be given priority. In this situation, some project beneficiaries are less likely to follow the Protocol / protective provisions and will need continuous monitoring, training, motivation and enforcement to ensure protocols are abided by. Equal opportunity for potential females, vulnerable and the disadvantaged should be given access to opportunities for employment under the project. Risks associated with the use of hand-held tools such as shovel, machete, rake, etc. and the potential of being exposed to disease causing agents during small-scale public works activities do exist. Though this risk is low, the following steps will be taken to ensure that the risk is further reduced to minimize injury: (i) assess and then manage the risks involved; (ii) ensure that the tools are suitable for the task and are well-maintained; (iii) train all workers how to use and store tools as necessary; and (iv) provide workers with appropriate PPEs.

### 13.4 BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Below is the overview of the key aspects of the national labor code taking into consideration terms and conditions of ESS2 (Labor and working conditions, paragraph 11).

#### Wages and Deduction

The amount and form of remuneration in Liberia is determined by the individual labor contract. Payment of wages is done on a monthly basis. The Labor Law of Liberia requires employers to pay wages that are due to an employee in cash, except where the employee agrees in writing to

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payment of wages by postal order, money order, check or lodgment at a financial institution to the credit of an account standing in the name of that employee or in the name of that employee and some other person or persons jointly. The Labor Laws set out a minimum salary of every category of workers under the employed of concession, industrial company, business, etc. based on the Decent Work Act. The minimum wage in the formal sector (concession, industry, business, company, etc.) for a worker/employee is United States Sixty-eight cents (US\$0.68) per hour or United States Five Dollars – Fifty Cents (US\$5.50) per day. Domestic and/or casual worker/employee is entitled to a minimum wage of United States Forty-three Cents (US\$0.43) per hour or United States Three Dollars – Fifty Cents (US\$3.50) per day. The employers usually deduct the income tax and health and social insurance contributions automatically from the wages and transfer them to the Liberia Revenue Authority or appropriate and social authorities.

**Working Hour & Break**

The Decent Work Act of Liberia (Part V, Chapter 17, Sec. 17.1a) states that the ordinary working hours shall be eight hours in any one day and forty-eight hours in any one week. The Act also requires employers to clearly display a notice showing the hours at which work begins and ends and the daily rest periods, in a readily accessible location in any workplace under their control.

**Overtime Work**

Section 17.5 of the Act allows overtime work. Any hour worked in excess of the ordinary working hours of eight hours per day is overtime. An employer may require an employee to work a maximum of five hours beyond ordinary hours of work in any week, and all work in excess of ordinary hours shall be paid at a rate not less than fifty per cent above the normal rate for that work.

**Meal Break**

Section 17.7 of the Act requires an employer to give an employee who works continuously for more than five hours a meal interval of at least one continuous hour, for which time the employee shall be paid.

**Daily Rest period**

Section 17.9 of the Act requires an employer to allow an employee a daily rest period of at least twelve consecutive hours between ending and commencing work.

**Leaves**

The right to annual leave is guaranteed to all employees under the Labor Law of Liberia. Chapter 18, Sec. 18.1 of the Act provides that any employee who works based on an individual labor contract shall benefit from the right for annual rest leave. Every employee is entitled to a minimum uninterrupted period of annual leave as follows: i) during the first twelve (12) months of continuous service with an employer, the number of leave days in one (1) week; ii) during the first twenty-four (24) months of continuous service with an employer, the number of leave days in two (2) weeks; iii) for continuous service of thirty-six (36) months, the number of leave days in three (3) weeks; and iv) for continuous service with the same employer for sixty (60) months and thereafter, the number of leave days is four (4) weeks. An employee who has taken either of these annual leaves shall receive their full remuneration as per the civil servant Standing Order and Decent Work Act. The Act also provides for paid maternity and paternity leave, sick leave, bereavement leave, and leave to care for other.

### **Labor Dispute**

Sections 40.1- 40.6 of the Decent Work Act contain provisions for resolution of labor dispute in Liberia. The Act has provisions in these section that allow workers to resolve individual and collective disputes between the employer and the employee(s) over the terms and conditions of a labor agreement.

## **13.5 BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY**

The Liberia Labor law (the Decent Work Act, 2015) is the primary legislation that provides the framework for occupational health and safety (OHS) in Liberia. Part VI of the Act which covers Occupational Safety and Health is very extensive and generally covers most of the key requirements of para. 24-30 of ESS2. Part VI covers several themes including the following:

### **(A) Objectives of the OHS legislation**

**The objectives of the OHS legislation** are generally in line with the objectives of ESS2. Amongst others, the objectives are to:

- i)** provide for the safety, health and welfare of employees and other persons at work;
- ii)** eliminate at their source, so far as is reasonably practicable, risks to the safety, health and welfare of employees and other persons at work;
- iii)** ensure that the safety and health of members of the public are not exposed to risks arising from work or workplaces; and
- iv)** provide for the involvement of workers, employers, and organizations representing those persons, in the formulation and implementation of safety, health and welfare standards

**(B) Employer's Obligation**

Part VI, Chapter 25, of the Decent Work Act provides requirements for Employer's Obligations. It covers general duties of employers, including the duty to ensure so far as is reasonably practicable the safety and health at work of all workers they have engaged; the duty to provide and maintain plant and systems of work that are safe and without risks to health; and the duty to provide, in appropriate languages, such information, instruction, training and supervision as may be necessary to ensure the safety and health of workers they have engaged.

**Even though OHS provisions in the Decent Work Act of Liberia are exhaustive and generally cover the objectives and requirements set out in ESS2 paragraphs 24-30, implementation and enforcement of these provisions are generally weak due to several reasons, including the lack of capacity, logistics, and inadequate funding. The MYS and LACE will therefore need to ensure that all applicable provisions are implemented and contractually enforceable by ensuring appropriate clauses and provisions are included in all relevant contracts.**

**13.6 RESPONSIBLE STAFF**

The overall responsibility for the implementation of all aspects of the project lies with the PMT. The PMT will have several staff, including a Project Coordinator, Environmental and Social Safeguard Officers, Procurement Officer, Financial Management Officer, and other staff, as needed throughout project implementation.

The PMT under the direct supervision of the Project Coordinator assisted by the Environmental Safeguard Officer and Social Safeguard Officer will coordinate the engagement and management of project workers and ensure that the following are adhered to, as appropriate:

- i) Monitor regularly that the Contractor(s) are meeting contractual obligations towards contracted and sub-contracted workers as included in the General Conditions of Contract the World Bank Standard Bidding Documents, and in line with ESS2 and Decent Work Act
- ii) Ensure that the workers for all contractors and subcontractors are aware of the grievance redress mechanism;
- iii) Ensure that grievances are registered and addressed properly by the appropriate party.
- iv) Ensure that specific health and safety requirements relating to COVID-19 are adhered to.

### 13.7 POLICIES AND PROCEDURES

Forced labor which consist of any work or services not voluntary performed that is exacted from an individual under threat of force or penalty will not be used in connection with the project.

#### **Freedom from forced or compulsory labor**

A person shall not directly or indirectly cause, permit or require any person to perform forced labor except in the event of emergency, that is to say, in the event of war or of a calamity or threatened calamity, such as fire, flood, famine, earthquake, violent epidemic or epizootic diseases, invasion by animal, insect or vegetable pests, and in general any circumstance that would endanger the existence or the well-being of the whole or part of the population.

#### **Freedom from the worst forms of child labor**

Part II, Section 2.3, of the Decent Work Act prohibits child labor. The Act defines a child as a person under the age of 18. The Act prohibits the following:

- i) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict;
- ii) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- iii) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties;
- iv) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or welfare of children.

#### **Employment rights and Obligation**

All the workers hired under the project, whether direct, contracted or sub-contracted, will be employed based on the principles of non-discrimination.

Without limiting the scope of the preceding provision, all persons who work or who seek to work in Liberia are entitled to enjoy and to exercise the rights and protections conferred by this Act irrespective of:

- i) race, tribe, indigenous group, language, color, descent, national, social or ethnic extraction or origin, economic status, community or occupation;
- ii) immigrant or temporary resident status;
- iii) sex, gender identity or sexual orientation;

- iv) marital status or family responsibilities; previous, current or future pregnancy or breastfeeding;
- v) political affiliation or opinion, or ideological conviction;
- vi) physical or mental disability; health status including HIV or AIDS status, whether actual or perceived; and
- vii) irrelevant criminal record, acquittal of a crime or dismissal of a criminal prosecution against them; or personal association with someone possessing or perceived to possess one or more of these attributes

### **13.8 AGE OF EMPLOYMENT**

The minimum age for employment on the project will be in line with the requirements of Liberia Labor Law since the Labor Law specifies a higher age than that specified ESS2 para. 17. Part II, Section 2.3, of the Decent Work Act prohibits child labor. The Act defines a child as a person under the age of 18. The Act also prohibits the following:

- i) all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict;
- ii) the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
- iii) the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties; and
- iv) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or welfare of children.

The Act prohibits children from engaging in hazardous work. It defines hazardous work as work involving the following:

- i) work which exposes children to physical, psychological or sexual abuse;
- ii) work underground, under water, at dangerous heights or in confined spaces;
- iii) work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads;
- iv) work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health; or

- v) work under particularly difficult conditions such as work for long hours or during the night, or work where the child is unreasonably confined to the premises of the employer.

**Therefore, the minimum age for employment under this project is set at 18. No child, as defined by the Liberian Labor Law, will be employed on this project.**

It is the contractor's responsibility to establish verifiable systems and procedures to implement this age requirement for staff under its control. The PMT will monitor this from time to time to ensure compliance. The system to be used may include, but not limited to, the use of valid national identification card, voter's registration card, birth certificate, passport, and driver's license. Whenever it is brought to the attention of the PMT or the project implementing entities of the presence of a person or persons below the minimum age of employment in the employ of the contractor, the Employer may investigate immediately and, if proven, request the contractor to immediately terminate said person's contract, while paying all due benefits, and remove them from site immediately.

The project will ensure that direct staff and community workers who will be directly engaged by the project also meet this requirement.

### **13.9 TERMS AND CONDITIONS**

The terms and conditions of employment applying to workers in this project will largely depend on the nature of their employment contracts and shall be governed by the Liberian Labor Law. These terms and conditions will be clearly mentioned in the written contracts for all type of workers, whether full-time or part-time, and be made known to project workers prior to commencement of work. Detail terms and conditions related to wages and hours of work are provided in Section 3 of this LMP.

#### **Direct Workers**

The terms and conditions of civil servants are guided by the national civil service regulations and other labor and employment legislation. The PMT consultants are guided by terms and conditions of their contractual agreements.

#### **Contracted Workers**

The bidding and contractual documents for Component 1 (e.g. service providers) will refer to this LMP and respective requirement to follow Liberia and WB standards for their contracted workers.

**Community Workers**

The terms and conditions of LIPW beneficiaries will be guided by the Project Operations Manual (POM), which stipulates among other things, the eligibility criteria to participate in the public works. Other terms and conditions to guide management of public work beneficiaries enrolled under public works will include:

- LIPW beneficiaries must be selected and enrolled from vulnerable households as defined in the POM; enrolment is voluntary;
- Eligible beneficiaries must be resident in the respective catchment area for at least 12 months and be at the age of 18 and above;
- Enrolled beneficiaries should be willing and able to undertake at least 4 hours of work per day for a period of 60 days (not continuously) for labor intensive activities;
- Payment of cash transfers will be done monthly and will be conditional to completion of work as per agreement within the sub-project plan;
- Failure to participate in public works (unexcused) will lead to forfeiting of payment;
- Sub-project supervisors are tasked to assess compliance of participation requirements;
- PMT is responsible for ensuring adherence to all project requirements.

**Primary Supply Workers**

The project's ability to influence its primary suppliers depends on the terms and conditions of contracts with the primary supplier. The project will ensure that the bidding and contractual documents for project activities that will require the services of primary suppliers will refer to this LMP and respective requirement to follow Liberia and WB standards for their workers.

**13.10 GRIEVANCE MECHANISM**

The implementing entities will put in place a Grievance Redress Mechanism (GRM) for the REALISE project which will build on the system currently being used by the Youth Opportunities Project. See section 11 for detailed description of the project GRM. Communities (including community workers) and individuals who believe that they are adversely affected by the project may submit complaints to the project level grievance redress mechanism.

In addition to the GRM required under ESS10 which is described in Section 11, a grievance mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Direct workers and contracted worker will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures will be put in place to make the grievance mechanism easily accessible to all such project workers. The project will ensure that each contractor/sub-contractor is aware of this requirement by inserting appropriate contractual clauses in all relevant contracts. The project will ensure that each contractor has a dedicated

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staff responsible for receiving and filing grievances, and that contractors have mechanisms in place to address grievances filed. The project will also ensure that contractors have in place clear procedures for escalating grievances, which are not resolved at the level of the contractor in the stipulated time, to the level of the PMT.

### **World Bank Grievance Redress System**

Communities and individuals who believe that they are adversely affected by a WB supported project may submit complaints to existing project level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB noncompliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the WB's corporate GRS, please visit: <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

### **13.11 CONTRACTOR MANAGEMENT**

For all relevant contracts, the project will use the Bank's 2017 Standard Procurement Documents which include language referring to labor and occupational, health and safety requirements of ESS2 that must be complied with.

The PMT will be responsible to monitor the performance of Contractor(s) in relation to contracted workers. The monitoring may include periodic audits, inspections of work sites, labor management records and reports compiled by contractors as required by the ESCP.

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**14. ESMF Disclosure**

Public disclosure of E&S documents is a requirement of the World Bank as well as the national environmental impact assessment laws and guidelines, and therefore the ESMF will be available to project affected groups, local NGOs, and the public at large. The PMT will make copies of the ESMF available in selected public places as required for information and comments as well as in the media. The ESMF will be announced and published on the websites of the project implementing entities. There will a public notification in local dailies that provides a brief description of the project, a list of venues where the ESMF report is on display and available for review, duration of display, and contact information for comments. The ESMF will subsequently be disclosed on the World Bank's website after in-country disclosure. Disclosure in-country and on the World Bank's website will take place before the board date.

**ANNEX 1: IN-HOUSE SUBPROJECT SCREENING CHECKLIST FORM**

*To be completed by Service Provider/Project ES Safeguards Officers, reviewed by Project E&S Safeguards Officers and approved by the Project Coordinator*

Serial No.....

Sub-Project Name: \_\_\_\_\_

County: \_\_\_\_\_ District: \_\_\_\_\_

Community: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Position: \_\_\_\_\_

Phone No.: \_\_\_\_\_

E-mail Contact: \_\_\_\_\_

**1.0 Description of Proposed Sub-Project**

**1.1 Nature of Sub-Project and Estimated Duration**

.....  
.....  
.....

**1.2 Scope of Sub-Project** [Size of labor force, area covered or length & width of road, type of raw materials (quantities and sources), types of equipment, implements, machinery, etc.]

.....  
.....  
.....  
.....  
.....

**1.3 Waste Generation**

- i. Types: Solid  Liquid  Gaseous  Other .....
- ii. Quantity: .....
- iii. Means/Place of Disposal: .....

**2.0 Proposed Site for Sub-Project**

**2.1 Location [attach a site plan or a map (if available)]**

- i. Location or Area (and nearest Town(s):  
.....
- ii. Land take (total area for sub-project and related activities):  
.....

**2.2 Land Use of the Area for the proposed Sub-Project:**

- |  |  |  |
|--|--|--|
| Agriculture <input type="checkbox"/>   | Residential <input type="checkbox"/>     | Existing Dugout <input type="checkbox"/> |
| Existing Road <input type="checkbox"/> | Reservation <input type="checkbox"/>     | Park/Recreation <input type="checkbox"/> |
| Industrial <input type="checkbox"/>    | Other (specify) <input type="checkbox"/> |  |

**2.3 Site Description [Attach photographs and sketches showing distances]**

- i. Distance from nearest water body or drainage channel (minimum distance measured from the edge of proposed site to the bank of the water body or drain).  
  
 More than 100 meters       100 meters       Less than 100 meters
- ii. Number of water bodies and/or drainage channels/depressions crossed by the route/road corridor:.....
- iii. Distance to nearest community (house) and/or other existing structures from the proposed site:.....
- iv. Number of communities (structures) along the entire stretch of the Sub project road:.....
- v. Will project increase pressure on land resources ... ..



**4.0 Environmental and Social Impacts**

**4.1 Air Quality** - Would the proposed Sub-project:

- i. Emit during subproject works
  - Dust
  - Smoke
  - VOCs
- ii. Expose workers or the public to substantial emissions? Yes  No
- Result in cumulatively increased emissions in the area? Yes  No
- vi. Create objectionable odor affecting people? Yes  No

**4.2 Biological Resources** - Would the proposed Sub-project:

- i. Have adverse effect on any reserved area? Yes  No
- ii. Have adverse effect on wetland areas through removal, filling, hydrological interruption or other means? Yes  No
- iii. Interfere substantially with the movement of any wildlife species or organisms? Yes  No
- vi. Be located within 100m from an Environmentally Sensitive Area? Yes  No

**4.3 Existing Population:**

- i. Will people living in or near the project area be adversely affected  
 .....  
 .....  
 .....

**4.4 Cultural Resources** - Would the proposed Sub-project:

- i. Disturb any burial grounds or cemeteries? Yes  No
- ii. Cause substantial adverse effect on any archeological or historic site? Yes  No
- iii. Alter the existing visual character of the area and surroundings, including trees and rock outcrops? Yes  No

**4.5 Water Quality and Hydrology** - Would the proposed Sub-project:

- i. Generate and discharge during construction:
  - Liquid waste
  - Liquid with human or animal waste
  - Liquid with pH outside 6-9 range
  - Liquid with oily substance
  - Liquid with chemical substance
  - Liquid with odor/smell

- ii. Lead to changes in the drainage pattern of the area, resulting in erosion or siltation? Yes  No
- iii. Lead to increase in surface run-off, which could result in flooding on or off-site? Yes  No
- iv. Increase runoff, which could exceed the capacity of existing storm water drainage? Yes  No

**4.6 Noise Nuisance** - Would the proposed Undertaking:

- i. Generate noise in excess of established permissible noise level? Yes  No
- ii. Expose persons to excessive vibration and noise? Yes  No

**4.7 Other Environmental and Social Impacts**

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**5.0 Management of (Environmental and Social) Impacts**

**5.1 Air Quality**

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**5.2 Biological Resources**

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**5.3 Cultural Resources**

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**5.4 Water Quality and Hydrology**

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**5.5 Noise**

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**5.6 Any Other**

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_____ Name of Representative of Community Facilitator	_____ Name of LACE Engineer	_____ Name of LACE Social Protection Program Manager
_____ Signature	_____ Signature	_____ Signature
_____ Date	_____ Date	_____ Date

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**ANNEX 2: ENVIRONMENTAL & SOCIAL MONITORING REPORT TEMPLATE**

- 1. Name of project:**
  
- 2. Subproject Location:**
  
- 3. Reporting Period:**
  
- 4. Project/Activity Brief:** Brief overview of the project, including description of activities undertaken/ongoing during the reporting period.
  
- 5. Update on the implementation of all recommendations made during the previous reporting period (if this is not the first monitoring report)**
- 6. Environmental and Social Status Report**
  - Description of the environmental and social impacts of activities undertaken/ongoing during the reporting period. This should include information on incident/accident recorded/reported during the reporting period
  - Project Compliance with environmental and social policy, laws and regulations
  - Status of implementation of site-specific plans including outcomes of implementation of mitigation measures
  
- 7. Other Observations**
  
- 8. Conclusions and Recommendations to Project Management Listing of recommendations for adjustments so that project becomes fully compliant**
  
- 9. Name of Monitor:**

Signature:

Date:

Approved by Project Manager:

Date:

**ANNEX 3: E&S DUE DILIGENCE CHECKLIST**

REALISE Project Environmental & Social Due Diligence Checklist
Community Name: _____ Location: _____ Subproject Completion date: _____
Public works implementation plan— <i>check all that apply:</i>
Followed standard technical design REALISE safeguards focal person review and approval Subproject works completed and in operation with all required facilities
E&S Considerations— <i>check all that apply:</i>
Proper site selection Land acquisition or donation properly documented Documented process to assess Environmental and Social impacts and risks of its projects Project site visits conducted as part of E&S screening and review Grievance process established and working
EPA Approval and Permit— <i>check all that apply:</i>
Did subproject works required EPA Screening (communal farming > 50 hectares) EPA Review documented EIA required Yes ____ No ____ If EIA required, approved and permitted
Third Party Audit E&S Specifications— <i>check all that apply:</i>
Conducted by _____ Confirms all E&S requirements completed

E&S Authorized Certification:
Independent E&S performance reviewed and cleared
REALISE National Coordinator _____
REALISE Environmental Officer _____
Service Provider _____
If any E&S Outstanding Issues Is there an Agreed Remedial Action Plan?—list and explain:
Required additional actions
Any outstanding or unresolved grievances?
Target Dates
Management authority
Attachments
Photos

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**ANNEX 4: EXAMPLE OF ENVIRONMENTAL CONTRACT CLAUSES**

Proper environmental management of subproject works can be achieved only with adequate site selection and works management. As such, the screening for subproject works should consider the following:

*Site selection*

Sites are likely to be offered as part of the community driven nature of subproject works. The site selection process should involve site visits and studies to analyze: (i) the site's urban, suburban, or rural characteristics; (ii) national, state, or municipal regulations affecting the proposed lot; (iii) accessibility and distance from inhabited areas; (iv) land ownership, including verification of absence of squatters and/or other potential legal problems with land acquisition; (v) determination of site vulnerability to natural hazards, (i.e. intensity and frequency of floods, earthquakes, landslides, hurricanes, volcanic eruptions); (vi) suitability of soils and subsoils for subproject works; (vii) site contamination by lead or other pollutants; (viii) flora and fauna characteristics; (ix) presence or absence of natural habitats (as defined by OP 4.04) and/or ecologically important habitats on site or in vicinity (e.g. forests, wetlands, coral reefs, rare or endangered species); and (ix) historic and community characteristics.

*Subproject works design*

Subproject works design criteria be per recommendation from Community Agriculture Technician and Community Facilitators.

*Subproject works and environmental rules for workers*

The following information is intended solely as broad guidance to be used in conjunction with local and national regulations. Based on this information, environmental rules for site workers should be developed for each project, taking into account the project size, site characteristics, and location.

As these subproject works could cause minimal impacts on and nuisances to surrounding areas, careful planning of subproject works is critical. Therefore, the following rules (including specific prohibitions and subproject works management measures) should be incorporated into all relevant subproject work files or folders.

*Prohibitions*

The following activities are prohibited on or near the project site:

- Cutting of trees for any reason outside the approved subproject works area;

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- Hunting, fishing, wildlife capture, or plant collection;
  - Use of unapproved toxic materials, including lead-based paints, asbestos, etc.
  - Disturbance to anything with architectural or historical value;
  - Building of bush fires;
  - Use of firearms (except authorized security guards);
  - Use of alcohol by workers.

#### *Subproject worksite Management Measures*

Waste Management and Erosion: Solid, sanitation, and, hazardous wastes must be properly controlled, through the implementation of the following measures:

#### *Waste Management:*

- Minimize the production of waste that must be treated or eliminated.
- Identify and classify the type of waste generated. If hazardous wastes (including health care wastes) are generated, proper procedures must be taken regarding their storage, collection, transportation and disposal.
- Identify and demarcate disposal areas clearly indicating the specific materials that can be deposited in each.
- Control placement of all subproject works waste (including earth cuts) to approved disposal sites (>300 m from rivers, streams, lakes, or wetlands). Dispose in authorized areas all of garbage, metals, used oils, and excess material generated during subproject works, incorporating recycling systems and the separation of materials.

#### *Maintenance:*

- Identify and demarcate equipment maintenance areas (>15m from rivers, streams, lakes or wetlands).
- Ensure that all equipment maintenance activities, including oil changes, are conducted within demarcated maintenance areas; never dispose spent oils on the ground, in water courses, drainage canals or in sewer systems.
- Identify, demarcate and enforce the use of within-site access routes to limit impact to site vegetation.
- Install and maintain an adequate drainage system to prevent erosion on the site during and after subproject works.

#### *Erosion Control*

- Erect erosion control barriers around perimeter of cuts, disposal pits, and roadways.

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- Spray water on dirt roads, cuts, fill material and stockpiled soil to reduce wind-induced erosion, as needed.
  - Maintain vehicle speeds at or below 10mph within work area at all times.

#### *Stockpiles and Borrow Pits*

- Identify and demarcate locations for stockpiles and borrow pits, ensuring that they are 15 meters away from critical areas such as steep slopes, erosion-prone soils, and areas that drain directly into sensitive waterbodies.
- Limit extraction of material to approved and demarcated borrow pits.

#### *Site Cleanup*

Establish and enforce daily site clean-up procedures, including maintenance of adequate disposal facilities for subproject works debris.

#### *Safety during subproject works*

Subject to the ToR of the contract between the Community Facilitators and LACE, The CF's responsibilities may include the protection of every person and nearby property from subproject works accidents.

#### *Nuisance and dust control*

To control nuisance and dust:

- Maintain all subproject works-related traffic at or below 15 mph on streets within 200 m of the site.
- Maintain all on-site vehicle speeds at or below 10 mph.
- To the extent possible, maintain noise levels associated with all machinery and equipment at or below 90 db.
- In sensitive areas (including residential neighborhoods, hospitals, rest homes, etc.) more strict measures may need to be implemented to prevent undesirable noise levels.
- Minimize production of dust and particulate materials at all times, to avoid impacts on surrounding families and businesses, and especially to vulnerable people (children, elders).
- Phase removal of vegetation to prevent large areas from becoming exposed to wind.
- Place dust screens around subproject works areas, paying particular attention to areas close to housing, commercial areas, and recreational areas.
- Spray water as needed on dirt roads, cut areas and soil stockpiles or fill material.
- Apply proper measures to minimize disruptions from vibration or noise coming from subproject works activities.

*Storage of construction materials and equipment*

Construction materials shall be stored in a manner to ensure that:

- There is no obstruction of service roads, passages, driveways and footpaths;
- Where it is unavoidable to obstruct any of the service paths, the contractor shall provide temporary or alternate by-passes without inconveniencing the flow of traffic or pedestrians;
- There is no obstruction of drainage channels and natural water courses;
- There is no contamination of surface water, ground water or the ground;
- There is no access by public or unauthorized persons, to materials and equipment storage areas;
- There is no access by staff, without appropriate protective clothing, to materials and equipment storage areas;
- Access by staff and public or unauthorized persons, to hazardous, corrosive or poisonous substances including sludge, chemicals, solvents, oils, asbestos cement dust or their receptacles such as boxes, drums, sacks and bags is prohibited.

*Acquisition of Construction Materials*

The contractor shall ensure that construction materials such as sand, quarry stone, soils or any other construction materials are acquired from approved suppliers and that the production of these materials by the suppliers or the contractor does not violate the environmental regulations or procedures as determined by the EPA.

*Movement and Transportation of Construction Materials*

The movement and transportation of construction materials to and within the construction sites shall be done in a manner that generates minimum impacts on the environment and on the community, consistent with the provisions of the ESMF.

*Fencing of Construction sites*

Construction sites refer to all areas required for construction purposes, including equipment staging areas. The boundaries of the site shall be demarcated prior to any work commencing on the site. It is the responsibility of the contractor to decide on an appropriate system of protective fencing for the site. The site boundary demarcation fence shall be removed when construction is completed, if appropriate.

The Contractor shall ensure that all their equipment and materials remain within the boundaries of the site and he shall ensure that materials used for construction on the site do not blow away or otherwise escape the site.

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**ANNEX 5: WORLD BANK INTERIM NOTES ON CONSTRUCTION OF CIVIL WORKS****CONTRACTORS' GENERAL GUIDELINE****COVID-19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS****INTRODUCTION**

The Contractor should identify measures to address the COVID-19 situation. What will be possible will depend on the context of the project: the location, existing project resources, availability of supplies, capacity of local emergency/health services, the extent to which the virus already exist in the area. A systematic approach to planning, recognizing the challenges associated with rapidly changing circumstances, will help the project put in place the best measures possible to address the situation. As discussed above, measures to address COVID-19 may be presented in different ways (as a contingency plan, as an extension of the existing project emergency and preparedness plan or as standalone procedures). Implementing Agencies (IA) and contractors should refer to guidance issued by relevant authorities, both national and international (e.g. WHO), which is regularly updated (WHO advice for the public, including on social distancing, respiratory hygiene, self-quarantine, and seeking medical advice, can be consulted on this WHO website: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-forpublic>). Addressing COVID-19 at a project site goes beyond occupational health and safety, and is a broader project issue which will require the involvement of different members of a project management team. In many cases, the most effective approach will be to establish procedures to address the issues, and then to ensure that these procedures are implemented systematically. Where appropriate given the project context, a designated team should be established to address COVID-19 issues, including PIU representatives, the Supervising Engineer, management (e.g. the project manager) of the contractor and sub-contractors, security, and medical and OHS professionals. Procedures should be clear and straightforward, improved as necessary, and supervised and monitored by the COVID-19 focal point(s). Procedures should be documented, distributed to all contractors, and discussed at regular meetings to facilitate adaptive management. The issues set out below include a number that represent expected good workplace management but are especially pertinent in preparing the project response to COVID19.

**(a) ASSESSING WORKFORCE CHARACTERISTICS**

Many construction sites will have a mix of workers e.g. workers from the local communities; workers from a different part of the country; workers from another country. Workers will be employed under different terms and conditions and be accommodated in different ways.

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Assessing these different aspects of the workforce will help in identifying appropriate mitigation measures:

- The Contractor should prepare a detailed profile of the project work force, key work activities, schedule for carrying out such activities, different durations of contract and rotations (e.g. 4 weeks on, 4 weeks off).
- This should include a breakdown of workers who reside at home (i.e. workers from the community), workers who lodge within the local community and workers in on-site accommodation. Where possible, it should also identify workers that may be more at risk from COVID-19, those with underlying health issues or who may be otherwise at risk.
- Consideration should be given to ways in which to minimize movement in and out of site. This could include lengthening the term of existing contracts, to avoid workers returning home to affected areas, or returning to site from affected areas.
- Workers accommodated on site should be required to minimize contact with people near the site, and in certain cases be prohibited from leaving the site for the duration of their contract, so that contact with local communities is avoided.
- Consideration should be given to requiring workers lodging in the local community to move to site accommodation (subject to availability) where they would be subject to the same restrictions.
- Workers from local communities, who return home daily, weekly or monthly, will be more difficult to manage. They should be subject to health checks at entry to the site (as set out above) and at some point, circumstances may make it necessary to require them to either use accommodation on site or not to come to work.

#### **(b) ENTRY/EXIT TO THE WORK SITE AND CHECKS ON COMMENCEMENT OF WORK**

Entry/exit to the work site should be controlled and documented for both workers and other parties, including support staff and suppliers. Possible measures may include:

- Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.
- Training security staff on the (enhanced) system that has been put in place for securing the site and controlling entry and exit, the behaviors required of them in enforcing such system and any COVID - 19 specific considerations.
- Training staff who will be monitoring entry to the site, providing them with the resources they need to document entry of workers, conducting temperature checks and recording details of any worker that is denied entry.

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- Confirming that workers are fit for work before they enter the site or start work. While procedures should already be in place for this, special attention should be paid to workers with underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.
  - Checking and recording temperatures of workers and other people entering the site or requiring self-reporting prior to or on entering the site.
  - Providing daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.
  - During the daily briefings, reminding workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.
  - Preventing a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or (if that is not possible) isolating such worker for 14 days.
  - Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.

### (c) GENERAL HYGIENE

Requirements on general hygiene should be communicated and monitored, to include:

- Training workers and staff on site on the signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular hand washing and social distancing) and what to do if they or other people have symptoms (for further information see WHO COVID-19 advice for the public).
- Placing posters and signs around the site, with images and text in local languages.
- Ensuring hand washing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places throughout site, including at entrances/exits to work areas; where there is a toilet, canteen or food distribution, or provision of drinking water; in worker accommodation; at waste stations; at stores; and in common spaces. Where hand washing facilities do not exist or are not adequate, arrangements should be made to set them up. Alcohol based sanitizer (if available, 60- 95% alcohol) can also be used.
- Review worker accommodations, and assess them in light of the requirements set out in IFC/EBRD guidance on *Workers' Accommodation: processes and standards*, which provides valuable guidance as to good practice for accommodation.
- Setting aside part of worker accommodation for precautionary self-quarantine as well as more formal isolation of staff who may be infected.

**(d) CLEANING AND WASTE DISPOSAL** Conduct regular and thorough cleaning of all site facilities, including offices, accommodation, canteens, common spaces. Review cleaning protocols for key construction equipment (particularly if it is being operated by different workers). This should include:

- Providing cleaning staff with adequate cleaning equipment, materials and disinfectant.
- Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.
- Where it is anticipated that cleaners will be required to clean areas that have been or are suspected to have been contaminated with COVID-19, providing them with appropriate PPE: gowns or aprons, gloves, eye protection (masks, goggles or face screens) and boots or closed work shoes. If appropriate PPE is not available, cleaners should be provided with best available alternatives.
- Training cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials).
- Any medical waste produced during the care of ill workers should be collected safely in designated containers or bags and treated and disposed of following relevant requirements (e.g., national, WHO). If open burning and incineration of medical wastes is necessary, this should be for as limited a duration as possible. Waste should be reduced and segregated, so that only the smallest amount of waste is incinerated (for further information see WHO interim guidance on water, sanitation and waste management for COVID-19).

**(e) ADJUSTING WORK PRACTICES**

Consider changes to work processes and timings to reduce or minimize contact between workers, recognizing that this is likely to impact the project schedule. Such measures could include:

- Decreasing the size of work teams.
- Limiting the number of workers on site at any one time.
- Changing to a 24-hour work rotation.
- Adapting or redesigning work processes for specific work activities and tasks to enable social distancing, and training workers on these processes.
- Continuing with the usual safety trainings, adding COVID-19 specific considerations. Training should include proper use of normal PPE. While as of the date of this note, general advice is that construction workers do not require COVID-19 specific PPE, this

should be kept under review (for further information see WHO interim guidance on rational use of personal protective equipment (PPE) for COVID-19).

- Reviewing work methods to reduce use of construction PPE, in case supplies become scarce or the PPE is needed for medical workers or cleaners. This could include, e.g. trying to reduce the need for dust masks by checking that water sprinkling systems are in good working order and are maintained or reducing the speed limit for haul trucks.
- Arranging (where possible) for work breaks to be taken in outdoor areas within the site.
- Consider changing canteen layouts and phasing meal times to allow for social distancing and phasing access to and/or temporarily restricting access to leisure facilities that may exist on site, including gyms.
- At some point, it may be necessary to review the overall project schedule, to assess the extent to which it needs to be adjusted (or work stopped completely) to reflect prudent work practices, potential exposure of both workers and the community and availability of supplies, taking into account Government advice and instructions.

#### **(f) PROJECT MEDICAL SERVICES**

Consider whether existing project medical services are adequate, taking into account existing infrastructure (size of clinic/medical post, number of beds, isolation facilities), medical staff, equipment and supplies, procedures and training. Where these are not adequate, consider upgrading services where possible, including:

- Expanding medical infrastructure and preparing areas where patients can be isolated. Guidance on setting up isolation facilities is set out in WHO interim guidance on considerations for quarantine of individuals in the context of containment for COVID-19). Isolation facilities should be located away from worker accommodation and ongoing work activities. Where possible, workers should be provided with a single well-ventilated room (open windows and door). Where this is not possible, isolation facilities should allow at least 1 meter between workers in the same room, separating workers with curtains, if possible. Sick workers should limit their movements, avoiding common areas and facilities and not be allowed visitors until they have been clear of symptoms for 14 days. If they need to use common areas and facilities (e.g. kitchens or canteens), they should only do so when unaffected workers are not present and the area/facilities should be cleaned prior to and after such use.
- Training medical staff, which should include current WHO advice on COVID-19 and recommendations on the specifics of COVID-19. Where COVID-19 infection is suspected, medical providers on site should follow WHO interim guidance on infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected.

- Training medical staff in testing, if testing is available.
- Assessing the current stock of equipment, supplies and medicines on site, and obtaining additional stock, where required and possible. This could include medical PPE, such as gowns, aprons, medical masks, gloves, and eye protection. Refer to WHO guidance as to what is advised (for further information see WHO interim guidance on rational use of personal protective equipment (PPE) for COVID-19).
- If PPE items are unavailable due to world-wide shortages, medical staff on the project should agree on alternatives and try to procure them. Alternatives that may commonly be found on construction sites include dust masks, construction gloves and eye goggles. While these items are not recommended, they should be used as a last resort if no medical PPE is available.
- Ventilators will not normally be available on work sites, and in any event, intubation should only be conducted by experienced medical staff. If a worker is extremely ill and unable to breathe properly on his or her own, they should be referred immediately to the local hospital (see (g) below).
- Review existing methods for dealing with medical waste, including systems for storage and disposal (for further information see WHO interim guidance on water, sanitation and waste management for COVID-19, and WHO guidance on safe management of wastes from health-care activities).

**(g) LOCAL MEDICAL AND OTHER SERVICES**

Given the limited scope of project medical services; the project may need to refer sick workers to local medical services. Preparation for this includes:

- Obtaining information as to the resources and capacity of local medical services (e.g. number of beds, availability of trained staff and essential supplies).
- Conducting preliminary discussions with specific medical facilities, to agree what should be done in the event of ill workers needing to be referred.
- Considering ways in which the project may be able to support local medical services in preparing for members of the community becoming ill, recognizing that the elderly or those with pre-existing medical conditions require additional support to access appropriate treatment if they become ill.
- Clarifying the way in which an ill worker will be transported to the medical facility, and checking availability of such transportation.
- Establishing an agreed protocol for communications with local emergency/medical services.
- Agreeing with the local medical services/specific medical facilities the scope of services to be provided, the procedure for in-take of patients and (where relevant) any costs or payments that may be involved.

- A procedure should also be prepared so that project management knows what to do in the unfortunate event that a worker ill with COVID-19 dies. While normal project procedures will continue to apply, COVID-19 may raise other issues because of the infectious nature of the disease. The project should liaise with the relevant local authorities to coordinate what should be done, including any reporting or other requirements under national law.

**(h) INSTANCES OR SPREAD OF THE VIRUS**

**WHO** provides detailed advice on what should be done to treat a person who becomes sick or displays symptoms that could be associated with the COVID-19 virus (for further information see WHO interim guidance on infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected). The project should set out risk-based procedures to be followed, with differentiated approaches based on case severity (mild, moderate, severe, critical) and risk factors (such as age, hypertension, diabetes). These may include the following:

- If a worker has symptoms of COVID-19 (e.g. fever, dry cough, fatigue) the worker should be removed immediately from work activities and isolated on site.
- If testing is available on site, the worker should be tested on site. If a test is not available at site, the worker should be transported to the local health facilities to be tested (if testing is available).
- If the test is positive for COVID-19 or no testing is available, the worker should continue to be isolated. This will either be at the work site or at home. If at home, the worker should be transported to their home in transportation provided by the project.
- Extensive cleaning procedures with high-alcohol content disinfectant should be undertaken in the area where the worker was present, prior to any further work being undertaken in that area. Tools used by the worker should be cleaned using disinfectant and PPE disposed of.
- Co-workers (i.e. workers with whom the sick worker was in close contact) should be required to stop work, and be required to quarantine themselves for 14 days, even if they have no symptoms.
- Family and other close contacts of the worker should be required to quarantine themselves for 14 days, even if they have no symptoms.
- If a case of COVID-19 is confirmed in a worker on the site, visitors should be restricted from entering the site and worker groups should be isolated from each other as much as possible.

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- If workers live at home and has a family member who has a confirmed or suspected case of COVID19, the worker should quarantine themselves and not be allowed on the project site for 14 days, even if they have no symptoms.
  - Workers should continue to be paid throughout periods of illness, isolation or quarantine, or if they are required to stop work, in accordance with national law.
  - Medical care (whether on site or in a local hospital or clinic) required by a worker should be paid for by the employer.

**(i) CONTINUITY OF SUPPLIES AND PROJECT ACTIVITIES**

Where COVID-19 occurs, either in the project site or the community, access to the project site may be restricted, and movement of supplies may be affected.

- Identify back-up individuals, in case key people within the project management team (PIU, Supervising Engineer, Contractor, sub-contractors) become ill, and communicate who these are so that people are aware of the arrangements that have been put in place.
- Document procedures, so that people know what they are, and are not reliant on one person's knowledge.
- Understand the supply chain for necessary supplies of energy, water, food, medical supplies and cleaning equipment, consider how it could be impacted, and what alternatives are available. Early pro-active review of international, regional and national supply chains, especially for those supplies that are critical for the project, is important (e.g. fuel, food, medical, cleaning and other essential supplies). Planning for a 1-2 month interruption of critical goods may be appropriate for projects in more remote areas.
- Place orders for/procure critical supplies. If not available, consider alternatives (where feasible). • Consider existing security arrangements, and whether these will be adequate in the event of interruption to normal project operations.
- Consider at what point it may become necessary for the project to significantly reduce activities or to stop work completely, and what should be done to prepare for this, and to re-start work when it becomes possible or feasible.

**(j) TRAINING AND COMMUNICATION WITH WORKERS**

Workers need to be provided with regular opportunities to understand their situation, and how they can best protect themselves, their families and the community. They should be made aware of the procedures that have been put in place by the project, and their own responsibilities in implementing them.

- it is important to be aware that in communities close to the site and amongst workers without access to project management, social media is likely to be a major source of

information. This raises the importance of regular information and engagement with workers that emphasizes what management is doing to deal with the risks of COVID-19. Allaying fear is an important aspect of work force peace of mind and business continuity. Workers should be given an opportunity to ask questions, express their concerns, and make suggestions.

- Training of workers should be conducted regularly, as discussed in the sections above, providing workers with a clear understanding of how they are expected to behave and carry out their work duties.
- Training should address issues of discrimination or prejudice if a worker becomes ill and provide an understanding of the trajectory of the virus, where workers return to work.
- Training should cover all issues that would normally be required on the work site, including use of safety procedures, use of construction PPE, occupational health and safety issues, and code of conduct, taking into account that work practices may have been adjusted.
- Communications should be clear, based on fact and designed to be easily understood by workers, for example by displaying posters on handwashing and social distancing, and what to do if a worker displays symptoms.

#### **(k) COMMUNICATION AND CONTACT WITH THE COMMUNITY**

Relations with the community should be carefully managed, with a focus on measures that are being implemented to safeguard both workers and the community. The community may be concerned about the presence of non-local workers, or the risks posed to the community by local workers presence on the project site. The following good practice should be considered:

- Communications should be clear, regular, based on fact and designed to be easily understood by community members.
- Communications should utilize available means. In most cases, face-to-face meetings with the community or community representatives will not be possible. Other forms of communication should be used; posters, pamphlets, radio, text message, electronic meetings. The means used should take into account the ability of different members of the community to access them, to make sure that communication reaches these groups.
- The community should be made aware of procedures put in place at site to address issues related to COVID-19. This should include all measures being implemented to limit or prohibit contact between workers and the community. These need to be communicated clearly, as some measures will have financial implications for the community (e.g. if workers are paying for lodging or using local facilities). The

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community should be made aware of the procedure for entry/exit to the site, the training being given to workers and the procedure that will be followed by the project if a worker becomes sick.

- If project representatives, contractors or workers are interacting with the community, they should practice social distancing and follow other COVID-19 guidance issued by relevant authorities, both national and international (e.g. WHO).

ANNEX 6: GENERIC PROJECT ESMP

Project Component/Activity	Potential Risks/Impacts	Mitigation Measures	Responsibility	Cost
<p><b>Component 1: Grant Support to Vulnerable Households to Revive or Start Small Businesses</b></p>	<p><b>GBV issues:</b> Exposure of project women beneficiaries and workers to sexual exploitation and abuse as well as sexual harassment</p>	<ul style="list-style-type: none"> <li>The project will develop and implement SEA/SH action plan. The plan will be implemented throughout the lifecycle of the project.</li> </ul>	<p>MYS/LACE/PIU</p>	<p>\$10,000</p>
		<ul style="list-style-type: none"> <li>Code of Conduct for project workers to be developed and widely disseminated to project staff and staff of contractors.</li> </ul>	<p>MYS/LACE/PIU</p>	<p>N/A (The CoC will be developed by project E&amp;S staff)</p>
		<ul style="list-style-type: none"> <li>Project GRM to incorporate GBV issues and ensure that GBV service providers are identified in project area for referral purposes.</li> </ul>	<p>MYS/LACE/PIU</p>	<p>\$10,000</p>

		<ul style="list-style-type: none"> <li>• Provide GBV trainings for project staff and all stakeholder involved in the project implementation.</li> </ul>	MYS/LACE/PIU	\$15,000
		<ul style="list-style-type: none"> <li>• Provide SEA/SH awareness for project beneficiaries especially women beneficiaries who likely to be affected</li> </ul>	MYS/LACE/PIU	\$15,000
	<p><b>The risk of discrimination and unfair treatment of potential beneficiaries.</b></p>	<ul style="list-style-type: none"> <li>• Project shall develop beneficiary selection criteria that ensure fair selection of beneficiaries in various communities</li> </ul>	MYS/LACE/PIU	N/A (to be developed by project staff)
		<ul style="list-style-type: none"> <li>• The project shall develop a project level GM and a GM that addresses concerns from community.</li> </ul>	MYS/LACE/PIU	\$5,000 (This cost will mainly cover the logistics involved in formulating the GRC as the GM will

				be developed by project E&S Staff.
	<p><b>Increased risk of COVID-19 infection:</b> Projects activities are likely to bring people into close proximity and are likely to increase in person interactions. The</p>	<ul style="list-style-type: none"> <li>Project to provide COVID-19 awareness to project beneficiaries and project staff</li> </ul>	MYS/LACE/PIU	\$10,000
		<ul style="list-style-type: none"> <li>Ensure that project staff and beneficiaries adhere to COVID-19 protocol as advised by the Government of Liberia</li> </ul>	MYS/LACE/PIU	N/A
		<ul style="list-style-type: none"> <li>Provision of PPEs and hand washing facilities to project staff and project beneficiaries</li> </ul>	MYS/LACE/PIU	\$5,000
	<p><b>Health and safety issues:</b> Exposure to unacceptable levels of occupational health risks such as noise, lighting and personal injury to beneficiary apprentices and their master trainers.</p>	<ul style="list-style-type: none"> <li>Relevant risk assessment to be undertaken and induction training including relevant occupational health and safety awareness must be given all new entrants.</li> </ul>	MYS/LACE/PIU	N/A (To be conducted by project E&S staff)
		<ul style="list-style-type: none"> <li>Provide training and proper supervision</li> </ul>	MYS/LACE/PIU	N/A

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		<ul style="list-style-type: none"> <li>Appropriate PPE to be provided by the project as required and be worn at all times to minimize exposure to identified risks.</li> </ul>	MYS/LACE/PIU	N/A (Already covered)
	Risk of financing micro enterprises that have the potential to adversely impact the environment	<ul style="list-style-type: none"> <li>The project implementation manual to include a “negative list” that excludes activities/enterprises that have the potential to pollute the environment. The “negative list” to be adhered to during selection of project activities for financing.</li> </ul>	MYS/LACE/PIU	N/A
<b>Component 2: Temporary Employment Support and Employability Development for Vulnerable Workers (Small-scale public works activities)</b>	Environmental issues/concerns associated with the small-scale public work activities, including erosion, wastes generation, noise, pollution of water resources, air and soil.	<ul style="list-style-type: none"> <li>During implementation, ensure that subproject activities are screened and appropriate site-specific action plans are developed to address issues related to waste generation,</li> </ul>	MYS/LACE/PIU	N/A (Covered under the cost of ESMP preparation)

		noise, water and soil pollution.		
		<ul style="list-style-type: none"> <li>• Ensure that equipment used on site are regularly maintained and kept in good running condition.</li> </ul>	MYS/LACE/PIU	\$2000
		<ul style="list-style-type: none"> <li>• Use noise barrier/silencer where necessary</li> </ul>	MYS/LACE/PIU	\$2000
		<ul style="list-style-type: none"> <li>• Avoid unnecessary clearing of vegetation to minimize erosion</li> </ul>	MYS/LACE/PIU	N/A
		<ul style="list-style-type: none"> <li>• Ensure that waste generated onsite are collected and disposed at authorized waste disposal sites.</li> </ul>	MYS/LACE/PIU	\$2,000
		<ul style="list-style-type: none"> <li>• Project to ensure that open burning of wastes is discouraged.</li> <li>• Dumping of wastes and unsuitable materials</li> </ul>	MYS/LACE/PIU	N/A

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		generated from project activities in water courses to be prohibited		
	Restriction to the use of land given the nature of informality of many settlements in urban areas	<ul style="list-style-type: none"> <li>The project shall include on the negative list activities that are likely to cause resettlement and land acquisition</li> </ul>	MYS/LACE/PIU	N/A
		<ul style="list-style-type: none"> <li>The project shall use the updated RPF developed under YOP and the ESMF ( see Section 6.1) to manage the risk associated with temporary restriction to land use resulting from project activities.</li> </ul>	MYS/LACE/PIU	N/A (RPF and ESMF already developed)
		<ul style="list-style-type: none"> <li>The project shall develop specific plans (RAP/ARAP) if need be to mitigate the potential risks and impacts</li> </ul>	MYS/LACE/PIU	\$15,000
	Potential Risks and impacts to cultural resources	The project has developed a Chance Finds Procedure that will be widely disseminated	MYS/LACE/PIU	N/A

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		to all project staff and contractors and use throughout the life of the project. In addition to the Chance Finds Procedure the project will also ensure the following: If a subproject intends to use cultural heritage of any project affected parties (including individuals and communities) for commercial purposes, it will inform the project affected parties of: (a) their rights under national law; (b) the scope and nature of the commercial development and the potential impacts; and (c) the potential consequences of such development and impacts.		
<b>Total Cost</b>				<b>\$91,000</b>

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