



Republic of Sierra Leone
Ministry of Energy

ENHANCING SIERRA LEONE ENERGY ACCESS PROJECT/ADDITIONAL FINANCING (P178677)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

SEPTEMBER 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Sierra Leone (the Recipient) is implementing the Enhancing Sierra Leone Energy Access Project (the Project), with the involvement of the Ministry of Energy (MOE) and the Electricity Distribution and Supply Authority (EDSA), as set out in the Financing Agreement. The International Development Association (the Association), acting as the implementing agency, has agreed to provide the original financing (P171059) and additional financing (P178677) for the Project, as set out in the referred agreement(s). This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional support, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time as necessary during Project implementation to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient, through the Ministry of Energy (MOE) and the Association, agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the recipient minister of Ministry of Energy (MOE). The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME
MONITORING AND REPORTING		
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, the status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism, Environment and Social Management Plan, Labor Management Procedures, Sexual Exploitation and Abuse and Sexual Harassment Action Plan.</p>	<p>Quarterly reports to Association throughout Project implementation commencing after the Effective Date. Submit each report to the Association no later than five (5) days after the end of each reporting period.</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injuries]. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association</p>
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association upon request as annexes to the reports to be submitted under action A above.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	<p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</p> <p>Notify the Association of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such a contractor; and, in the event of any such referral, notify the Association of (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.</p>	Not later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).	EDSA/MoE
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Maintain Project Implementation Unit (PIU) at MOE and Health, Safety, Social and Environment unit (HSSE) at EDSA with qualified staff and resources to support the management of E&S risks at each implementing agency in accordance with the following terms:</p> <p>MOE/EDSA shall build on the ESURP PIU by maintaining an organizational structure with the following specialists:</p> <p>(i) a procurement specialist; (ii) a contract management specialist; (iii) a financial management specialist; (iv) engineer(s) specialized in renewable energy; (v) an environmental and safeguard specialist, (with expertise in SEA/SH risks and impacts); (vi) Gender & Social Safeguard Specialist (vii) a monitoring and evaluation specialist; and (viii) a communications specialist (with expertise in stakeholder engagement),</p> <p>The PIU shall be supported by experienced consultants to assist in project implementation and in building the capacity of the regular EDSA staff.</p>	The project has staffed the required E&S specialists per the ESCP. These positions shall be maintained throughout Project implementation.	EDSA/MoE
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p>	a. The ESMF of the parent project was prepared and disclosed prior to project appraisal.	EDSA/MoE/Contractor

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> a. Include risk management of activities listed under the AF (Component 4) as an annex to the parent project ESMF, as an updated version. b. Adopt and implement the updated Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. c. Adopt and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for [infrastructure/works under components 1, 2 and 4 for which the ESIA/ESMP is required, consistent with the relevant ESSs. d. cause contractors to adopt and implement Contractor’s Environmental and Social Management Plan (ESMP), as set out in the ESMF. 	<ul style="list-style-type: none"> b. The risk assessment and management of the AF activities (Component 4) will be prepared and annexed to the parent ESMF. The updated ESMF will be redisclosed 1 month after the AF effectiveness. The recipient shall implement the updated ESMF throughout Project implementation. c. Adopt the ESIA and ESMP prior to initiation of construction activities, and thereafter implement the ESIA and ESMP throughout Project implementation. d. Adopt the Contractor ESMP prior to the carrying out of a subproject that requires the adoption of such C- ESMP. Once adopted, implement the respective C-ESMP throughout Project implementation. 	
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <ul style="list-style-type: none"> a. Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and the code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts. 	<ul style="list-style-type: none"> a. As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. b. At least semi-annually throughout Project implementation 	EDSA/MoE/ Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>b. THIRD-PARTY MONITORING</p> <p>Independent third-party monitoring agent(s) shall be appointed prior to construction commencement under the Project. The PIUs (EDSA and MOE) shall share Project monitoring reports with the third-party monitoring agents for validation. These reports will outline safeguard compliance using site-specific ESMPs/ESIAs and RAPs if prepared.</p> <p>The independent third-party monitors shall check:</p> <ul style="list-style-type: none"> (i) whether the ESMF is being correctly adhered to; (ii) whether appropriate mitigation measures have been identified and implemented effectively in accordance with this ESCP and whether these need to be adjusted to reflect changing circumstances and; (iii) the extent to which all stakeholder groups are involved in sub-project implementation. <p>The third-party monitoring reports shall be submitted to the Association as part of the Recipient’s reporting under Section A of this ESCP.</p>		
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project (Moyamba Solar park feasibility studies, medium voltage and distribution substations of district headquarters feasibility studies, health centers and schools electrification feasibility studies ; energy sector feasibility studies, clean cooking technical assistance activities are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	<i>EDSA/MoE/Contractors</i>
1.5	<p>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</p> <p>Not Applicable as the project does not have a CERC component.</p>	N/A	N/A
1.6	<p>ASSOCIATED FACILITIES</p> <p>No associated facilities identified.</p>	N/A	N/A
1.7	<p>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</p> <p>No sub-projects are subject to retroactive financing under the project.</p>	N/A	N/A
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	An LMP was prepared and disclosed prior to project appraisal as part of the ESMF of the parent project and shall be implemented throughout Project implementation.	<i>EDSA/MoE/</i>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish worker's grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	<i>EDSA/MoE/contractors</i>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement a Waste Management Plan (WMP), to manage hazardous, non-hazardous and electronic wastes, consistent with ESS3.</p>	Adopt the WMP prior to the commencement of construction activities and thereafter implement the WMP throughout Project implementation.	<i>EDSA/MoE/Contractors</i>
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESMP.	<i>EDSA/MoE/Contractors</i>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESMP.	<i>EDSA/MoE/Contractors</i>
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations (e.g., a fire response or natural disaster), exposure to the COVID-19 disease, accidents and pollution, sexual exploitation and abuse, sexual harassment, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	Same timeframe as for the adoption and implementation of the ESMPs.	<i>EDSA/MoE/Contractors</i>
4.3	<p>SEA AND SH RISKS</p>	The SEA/SH Action Plan prior to preparation of procurement documents, and thereafter implement the SEA/SH Action Plan throughout Project implementation.	<i>EDSA/MoE/Contractors</i>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Adopt and implement a SEA/SH Action Plan to assess and manage the risks of SEA and SH. The project shall hire a service provider to assist in the preparation of the SEA/SH Action plan as well as to support the prevention and response efforts. Contractors shall adopt the project SEA/SH Action Plan as part of Contractor ESMP and shall implement the provisions.	Contractors shall adopt the project SEA/SH as part of the C-ESMP prior to the recruitment of contractor workers.	
4.4	SECURITY MANAGEMENT Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities. Such measures are reflected in the ESMP guided by the principles of proportionality and Good International Industry Practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	Prior to engaging security personnel and thereafter implemented throughout Project implementation].	
4.5	INVOLVEMENT OF THE MILITARY a. No military personnel should be engaged in any aspects of the project activities.	N/A	N/A
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	The RPF of the parent project was prepared and disclosed prior to project appraisal and shall be implemented throughout Project implementation.	EDSA/MoE
5.2	RESETTLEMENT PLANS Adopt and implement a resettlement action plan (RAP)[for each activity under the Project for which the RPF requires such RAP, as set out in the RPF, and consistent with ESS5.	Adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and [as applicable] displaced people have been resettled and moving allowances have been provided.	EDSA/MoE
5.3	GRIEVANCE MECHANISM The grievance mechanism (GM) to address the project including resettlement-related complaints shall be described in the RPF, RAPs and SEP.	Adopt and implement the GRM prior to initiating the RAP process.	EDSA/MoE
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>The ESMF includes a procedure for screening biodiversity risk and impacts. In the unlikely event, that significant biodiversity risk is observed from the screening, the project shall adopt and implement a Biodiversity Management Plan (BMP) as part of the ESMP in accordance with the guidelines of the ESIA that shall be prepared for the Project, and consistent with ESS6.</p>	Screen and adopt the BMP as part of project ESMP prior to initiation of any sub-project that may affect biodiversity, and thereafter implement the BMP throughout Project implementation.	EDSA/MoE
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES [
7.1	<p>INDIGENOUS PEOPLES' PLANNING FRAMEWORK</p> <p>Not relevant. There are no distinct social and cultural groups in the Project area that exhibit characteristics meeting the criteria for indigenous or traditionally under-served communities as spelled out in the ESS7.</p>	N/A	N/A
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>A standalone Cultural Heritage Management Plan (CHMP) shall not be required for the scope of project interventions.</p>		
8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance finds procedures as part of the ESMF of the Project.</p>	Describe the chance to find procedures in the ESMF prior to project appraisal. Implement the procedures throughout Project implementation.	EDSA/MoE
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	<p>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</p> <p>This standard is not relevant as the project does not involve the use of Financial Intermediaries (FIs).</p>	N/A	N/A
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner that is free of manipulation, interference, coercion, discrimination and intimidation.</p>	An SEP of the parent project was prepared and disclosed prior to project appraisal. It shall be updated for the AF and be implemented throughout Project implementation.	EDSA /MoE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism to receive and facilitate the resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The GM will incorporate digital platforms for grievance recording, tracking and reporting.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centred manner.</p>	Establish the grievance mechanism prior to recruitment of project workers and thereafter maintain and operate the mechanism throughout Project implementation.	EDSA/MoE
CAPACITY SUPPORT			
CS1	<p>Based on E&S Capacity Assessment, the following types of training will be provided to the relevant target groups, such as PIU staff, stakeholder community, project workers, consultants, contractors, and sub-contractors:</p> <ul style="list-style-type: none"> • stakeholder mapping and engagement • specific aspects of environmental and social assessment • emergency preparedness and response • occupational Health and Safety • community health and safety. • GBV/SEA/SH awareness, prevention, reporting and management protocols • Social inclusion • Labor influx and Management Procedure • Contractor management • Additional training that will be identified during implementation. 	<i>Quarterly and as needed throughout project implementation</i>	EDSA/MoE/Contractors
CS2	Conduct training for Project workers on occupational health and safety including emergency prevention and preparedness and response arrangements for emergency situations.	Quarterly and as needed throughout project implementation	<i>EDSA/MoE/Contractors</i>