



Government of Sierra Leone
Ministry of Water Resources and Sanitation

**Sierra Leone Water Security and WASH
Access Improvement Project (P507588)**

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

Appraisal Version

April 14, 2025

Freetown, Sierra Leone

1. The Government of Sierra Leone (the Recipient) will implement the Sierra Leone Water Security and WASH Access Improvement Project (P507588) (the Project), with the involvement of the Ministry of Water Resources and Sanitation (MWRS), as set out in the Financing Agreement between the Republic of Sierra Leone and the International Development Association (the Agreement). The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred Agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) of the World Bank and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the 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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreement. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. Establish and maintain a WASH Project implementation Team (WASHIT) within the Ministry of Water Resources and Sanitation (MWRS), which will be composed of a coordinator and subject matter specialists who will be recruited on a competitive basis. Counterpart staff of the MWRS and key staff of implementing agencies will benefit from knowledge transfer and capacity strengthening from the WASHIT subject matter specialists. In particular, the WASHIT of the MWRS will be responsible for fiduciary, environmental and social risk management, monitoring and evaluation and reporting to the Bank. In addition to the coordinator and subject matter experts, WASHIT will have qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project. These include an Environmental Specialist, Social Specialist and a Gender Based Violence (GBV) Specialist.</p> <p>b. MWRS shall work with National Water Resources Management Authority (NWRMA), the Guma Valley Water Company (GVWC), Sierra Leone Water Company (SALWACO), Sierra Leone Electricity and Water Regulatory Commission (EWRC), the Freetown City Council (FCC) and Western Area Rural District Local Council (WARDC) to manage E&S risks and impacts of the Project, under Component 1-3, coordinate. MoWRS shall ensure integration of E&S risk management (ESRM) of potential downstream E&S risks and impacts of the Technical Assistance (TA) activities planned under Component 1 (TA Type 2 & 3), Component 2 (TA Type 1), Component 3 and 4. (TA Type 3).</p>	<p>a. Establish and maintain a WASHIT at MWRS as set out in the Financing Agreement.</p> <p>b. Recruit the Environmental, Social, and GBV Specialists in the MWRS WASHIT within three months of the Project Effective Date, and thereafter maintain these positions throughout Project implementation.</p>	MWRS
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Based on the institutional assessments of six sector institutions and staff capacity assessments of five central institutions and 16 local councils. The Project will support MWRS in developing the training material and curriculum for both on-the-job/vocational training programs and for a Masters (postgraduate) program with the University of Sierra Leone for a degree on water management (Component 1), as well as training for GVWC Staff, FCC and WARDC behavior change campaigns on the Fecal Sludge Treatment Plant (FSTP) under Component 3 and 4 respectively.</p>	Throughout Project implementation.	MWRS
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING. Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through [monthly] contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. 	Submit quarterly reports to the Association throughout Project implementation, commencing after the Project Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.	MWRS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	Submit the monthly reports to the Association upon request OR as annexes to the reports to be submitted under action C above.	MWRS
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	MWRS
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>1. Prepare and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs, including the following Annexes: Chance Finds Procedures, Occupational Health & Safety (OHS) Plan, Emergency Preparedness and Response Plan (EPRP). The Labor Management Procedures (LMP), Sexual Exploitation and Abuse (SEA)/ Sexual Harassment (SH) Prevention and Response Action Plan will be prepared one month after Project effective date. The client is required to conduct an institutional capacity assessment for Protected Area authorities in Western Area National Park Management.</p> <p>2. Prepare and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the Project, consistent with the relevant ESSs. Afterwards, an ESMP will be prepared for each sub project activity.</p>	<p>1. Prepare the ESMF by Project appraisal and thereafter implement the ESMF throughout Project implementation.</p> <p>2. Prepare the Labor Management Procedures (LMP), Sexual Exploitation and Abuse (SEA)/ Sexual Harassment (SH) Prevention and Response Action Plan one month after Project effective date and thereafter implement the LMP and SEA/SH Plan throughout Project implementation.</p> <p>3. Prepare the ESIA and ESMP before commencement of any civil works and contractor mobilization to site and thereafter implement the ESIA and ESMP throughout Project implementation.</p>	MWRS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the Labor Management Procedures and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.</p>	MWRS
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project including, inter alia, Component 1 (Type 2 & 3), Component 2 (Type 1), Component 3 and 4 (Type 3- training for GVWC Staff) in accordance with terms of reference acceptable to the Association that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout Project implementation.	MWRS
1.4	<p>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</p> <p>This component is integrated into the Project design without funding or activity as its purpose is to facilitate fast response to a crisis related to the Project development objectives, e.g. flood, for which the government may want to reallocate funding rapidly to organize crisis response. It may or may not be mobilized.</p> <p>1. Ensure that the Sierra Leone Water Security and WASH Access Improvement Project CERC Manual as specified the legal agreement includes a description of the E&S assessment and management arrangements [including, if applicable, insert name of any CERC-ESMF/ESMF Addendum that will be included or referred to in the CERC Manual] for the implementation of Component 6: Contingency Emergency Response Component , in accordance with the ESSs.</p> <p>2. Implement the E&S provisions of the CERC Manual, including, if applicable, the CERC-ESMF/ESMF Addendum, and any assessments and plans required therein.</p>	<p>1. The preparation of the [insert name of manual] and, if applicable, other E&S documents, as relevant in form and substance acceptable to the Association is a withdrawal condition under Section [XX] of Schedule 2 of the [name of legal agreement].</p> <p>2. In accordance with the timeframes specified in the CERC Manual including, if applicable, the CERC-ESMF/ESMF Addendum, and any assessments and plans required therein.</p>	MWRS and NDRMC
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare and implement the Labor Management Procedures (LMP) for the Project as part of the ESMF.</p>	Prepare the LMP one month after Project effective date and thereafter implement the LMP throughout Project implementation.	MWRS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Prepare and implement an OHS Management Plan to assess and manage the OHS risks and impacts of the Project, as part of the ESMF and ESIAs/ESMPs indicated in action 1.1. above.</p> <p>Require contractors and subcontractors to prepare and implement OHS Management Measures or Plans in accordance with requirements described in the ESMF and ESIAs/ESMPs indicated in action 1.1. above.</p>	Prepare the OHS Management Plan prior to commencement of site-specific work and contractor mobilization; adopt the OHS measures before launching the bidding process for the respective Project activities under Component 3 & 4 and thereafter implement throughout Project implementation.	MWRS
2.3	<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 grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MWRS
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Prepare the WMP before commencement of site-specific work and contractor mobilization.	MWRS
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Resource efficiency and pollution prevention and management measures shall be covered under the ESMF to be prepared under action 1.2 above and subsequently in ESMPs to be prepared during implementation.</p>	Adopt and implement the ESMP and thereafter throughout the Project implementation.	MWRS
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 1.1. above.</p>	Same timeframe as for the preparation and implementation of the ESIAs/ESMPs.	MWRS
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, the behavior of Project workers, prevention of communicable diseases, risks of labor influx, response to emergencies, and include mitigation measures in the ESMF and ESIAs/ESMPs prepared under action 1.1 above.</p> <p>The universal access concept (access for everyone) shall be considered in the provision of safe and clean water access at schools, hospitals, public parks, fish landing sites, touristic and recreational areas, and community level, including individuals with different forms of disabilities.</p>	Same timeframe as for the preparation and implementation of the ESMF and ESIAs/ESMPs under action 1.1 above.	MWRS
4.3	<p>SEA AND SH RISKS</p> <ul style="list-style-type: none"> • Prepare and implement a SEA/SH Prevention & Response Action Plan, as part of the ESMF, to assess and manage the risks of SEA and SH. • Incorporate GBV/SEA/SH procedures into the ESIAs/ESMPs to be prepared under action 1.1 above, consistent with the ESMF. 	The SEA/SH Action Plan shall be prepared one month after Project effective date and thereafter implement the SEA/SH Action Plan throughout Project implementation.	MWRS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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 including the Guma Valley Protected Area, Western Area National Park. The proposed project aims to support the enforcement of policies protecting the Western Area National Park and Guma Valley Water Reserve Dam. This may lead to conflicts between communities and law enforcement personnel. The risk mitigation measures shall be reflected, as needed, as part of an ESMP or Security Risk Assessment and Management Plan.	Same timeframe as for the preparation and implementation of the ESIAs/ESMPs prepared under action 1.1 above.	MWRS
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT [FRAMEWORK] [PLAN] or [PLANS] 1. Prepare and implement a Resettlement Framework (RF) for the Project, consistent with ESS5, including processes on access restriction to natural resources, protected areas and national parks. 2. Prepare and implement a Resettlement Plan (RP) and/or a Livelihood Restoration Plan (LRP) [for each activity under the Project for such RP or LRP is required], [as set out in the RF] [and] consistent with ESS5.	1. Prepare the RF (with a process framework as an annex) prior to Project Appraisal and thereafter implement the RF throughout Project implementation. 2. Prepare and implement the respective RP and/or LRP prior to carrying out site specific work and contractor mobilization, including ensuring that before taking possession of the land and related assets, full compensation has been provided, livelihoods supported, displaced people have been resettled and moving allowances have been provided.	MWRS
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Using the screening form in the ESMF, conduct a preliminary screening and assess each of proposed activity/subproject for financing in terms of its risks and impacts on biodiversity and living natural resources. Where the environmental and social assessment has identified potential risks and impacts on biodiversity or habitats, the Borrower will prepare a Biodiversity Management Plan (BMP) either as stand-alone or as part of the ESMP to manage those risks and impacts in a manner proportionate to the nature and magnitude of the risks and in accordance with the mitigation hierarchy and GIIP.	During subproject screening process and prior to commencement of Project activities. Adopt the BMP (if needed) and thereafter implement the BMP throughout Project implementation.	MWRS
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS]: The Bank has conducted a screening of indigenous peoples and sub-Saharan Africans historically underserved traditional local communities in Sierra Leone. At this stage, no people meet the policy requirements. Future assessments will inform the relevance of this standard.	Not relevant	
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Adopt and implement measures to address risks to cultural heritage, in accordance with the ESMF and ESIAs/ESMPs under Component 3 and 4 of the Project, and consistent with ESS8.	Same timeframes as for the preparation and implementation of ESMF, ESIAs/ESMPs prepared under action 1.1 above and thereafter implement the measures throughout Project implementation.	MWRS
8.2	CHANCE FINDS Describe and implement the chance finds procedures, prepared as part of the ESMF.	Describe the chance find procedures in the ESMF and ESIAs/ ESMPs. Implement the procedures throughout Project implementation.	MWRS
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS): Not relevant to the Project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Update 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, which is free of manipulation, interference, coercion, discrimination and intimidation. MWRS WASHIT shall appoint (as stated in action A above) and maintain the required human resources and adequate budget to support the implementation of the SEP activities of the Project.	Update the SEP prior to Project Appraisal and thereafter implement the SEP throughout Project implementation.	MWRS
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Establish the grievance mechanism prior to the commencement of Project activities and thereafter maintain and operate the mechanism throughout Project implementation.	MWRS
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: <ul style="list-style-type: none"> (i) Recruitment of environmental Specialist, social specialist and GBV/SEA/SH specialist. (ii) Training of ESRM staff and adequate resourcing (finance, office and logistics). (iii) E&S specialists have reviewed and understand the ESCP, E&S assessments, plans and other documents. (iv) E&S specialists know what obligations under the legal agreement and the ESCP: preparing RF, ESMF, LMP, SEA/SH, social assessment. 			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> (v) Memorandum of Understanding or other written agreements/arrangements between Project Implementation Entities and other concerned agencies to ensure proper coordination of E&S risk management activities. (vi) E&S grievance mechanism operational guideline developed established and functional. (vii) The Project Implementation manual (PIM) has adequately reflected a provision on how to operationalize the environmental and social risk management commitments. (viii) The Project annual work plans and budget has dedicated line items for environmental and social risk management work. (ix) For all land acquisition, RP is prepared, compensation as necessary paid, a process is defined for any restriction of access and livelihoods support arrangements are in place. 		