

LIBERIA LAND AUTHORITY

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN FOR THE RENOVATION OF NEW LLA HEADQUARTERS LIBERIA LAND ADMINISTRATION PROJECT (LLAP)

ASHMUN AND GURLEY STREETS, MONROVIA, LIBERIA

Submitted to: Environmental Protection Agency

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ACRONYMS

BoQ Bill of Quantity

EIA Environmental Impact Assessment

EMP Environmental Management Plan

EPA Environmental Protection Agency

EPML Environmental Protection and Management Law

ESIA Environmental and Social Impact Assessment

ESMF Environmental and Social Management Framework

ESMP Environmental and Social Management Plan

LISGIS Liberia Institute of Statistics and Geo-Information Services

LLA Liberia Land Authority

MPW Ministry of Public Works

PPE Personal Protective Equipment

UMU United Methodist University

WB World Bank

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1. Introduction

1.1 Background

The Liberia Land Authority (LLA) was established with the passage of the LLA Act by the Legislature in October 2016. The LLA has the legal mandate for land administration in Liberia. Relevant provisions of the LLA Act have empowered the LLA with the onus of providing a range of land related services to the public.

In 2018, the Government of Liberia received a grant of US\$7 million from the World Bank towards the cost of implementation of the Liberia Land Administration Project (LLAP). The project development objective is to strengthen the capacity of the LLA and established a land administration system. The Project explicitly consists of four components: (1) support to the Liberia Land Authority focusing on developing land laws/regulations and administrative procedures; (2) piloting the registration of customary land; (3) development of a land administration system, and (4) project coordination, monitoring and evaluation. A restructuring of the Project was signed on April 14, 2020, which restructured Component 2, which resulted in an update of the Project's Integrated Safeguards Data Sheet (ISDS) (disclosed on March 19, 2020). However, the restructuring and the update of the ISDS did not affect the safeguards requirements for the renovation works covered under Component 1 of the Project.

The first component of the project includes operational support to the LLA and per the Project Appraisal Document (PAD) this includes renovations of LLA's offices. The LLA is now in the process of relocating to a more spacious and conducive building that was formerly occupied by the Ministry of Commerce. The relocation at the proposed headquarters requires the renovation of a four-story building. The building is currently empty and not occupied by any LLA staff or other users. A joint LLA, World Bank, Environment Protection Agency (EPA), General Service Agency (GSA), and Lantmäteriet (Swedish mapping, cadastral and land registration authority) visit to the proposed building was conducted on March 3, 2020 and the preliminary findings of this visit indicated that the building is adequate for LLA's operations. Dwellers were not found during this visit or subsequent visits of the author of this ESMP.

The renovation works consist mostly of renovations within the existing structure and the main works to be conducted consist of masonry and window works, tiles laying, plumbing, welding, painting, and carpentry.

The renovation process requires a clear identification of potential environmental and social impacts for identifying options for mitigating adverse impacts as outlined in the Project's Environmental and Social Management Framework (ESMF), which determined that an Environmental and Social Management Plan (ESMP) shall be prepared in case of minor renovations being carried out under the Project. The objective of this ESMP is to provide a set of mitigation, monitoring, and institutional measures to be undertaken during the renovation works to eliminate adverse environmental and social impacts, offset risks and impacts or reduce them to acceptable levels – including the actions needed to implement mitigation measures

The audience of this ESMP is the LLA, the Environmental Protection Agency (EPA), the World Bank and other relevant agencies as well as the public in general on the nature of the proposed renovations and associated risks and mitigation measures). LLA has retained the services of an independent consultant, to prepare and submit this ESMP. Accordingly, in fulfillment of the stipulated requirements in line with the Terms of Reference, the consultant site visits to the proposed renovation site and held consultations with the management of LLA and relevant authorities.

1.1. Project Site Location

County and baseline conditions

The proposed renovation works will be implemented in Monrovia, the capital of Liberia. Monrovia is located in Montserrado County in the northwestern part of the country. Monrovia borders the Atlantic Ocean and its climate is tropical with dry and wet seasons. According to LISGIS (2008), the population of greater Monrovia is 970,824 people. In comparative terms, the population was determined to be very densely populated, being the most densely packed in Liberia. The city of Monrovia presents the highest of opportunities for employment and abundance of social amenities. As an administrative hug of the Republic, the busiest seaport, better communication and transport connections, greatest endowed in terms of physical infrastructure and, also, the business capital. Monrovia is governed by the Monrovia City Corporation. The proposed renovations will be implemented in Central Monrovia. The location of Montserrado County and Monrovia can be seen in Figure 1 and Figure 2 provides a map of Montserrado County.



Figure 1: Map of Liberia



Figure 2: Map of Montserrado County

Project Site

Geographically, the proposed project is located at the intersection of Gurley and Ashmun Streets directly opposite to the First United Methodist Church, established in 1822. The site is surrounded by densely populated institutions like the United Methodist University (UMU), stores, and residential buildings amongst others. Figure 3 shows a map of the area and identifies the proposed site of the renovations.



Figure 3: Project Site (star indicates proposed building)



Figure 4: Front and side Views of the Project Site

The project vicinity is host to several national monuments, institutions, and shrines. Prominent among them, and worthy of notification include the First United Methodist Church; the Providence Baptist Church; the College of West Africa (Secondary school and junior college); the National Law Library; the National Museum and; the Centennial Memorial Pavilion. The assessment revealed that except for the First United Methodist Church which is about 70 feet directly opposite the building under study, the operations of the project will not adversely impact these sites as they are distance away from the project.



Figure 5: First United Methodist Church

Based on the site visits the anticipated social and environmental impacts are anticipated to be minor. The risks could potentially include occupational health and safety risks for workers involved in the renovation works; public health & site safety risks that could affect nearby residents; hazardous substances such as paint may pose a risk to workers and the residents; temporary negative impacts on air quality due to vehicles carrying renovation materials; spread of COVID-19 could affect workers and residents; minor soil contamination could occur due to handling of paint and other substances; gender based violence and disturbance of the social environment could affect residents due to temporary labor influx and renovation staff on the site; waste from renovation materials could lead to pollution and poor aesthetics; crime could affect the project site; child labor is a risk on the site of the renovation firm; sanitation related risks could occur due to presence of workers; traffic could temporarily be obstructed if vehicles transport renovation materials to the site; some works could lead to temporarily increase of noise.

1.2. Objectives of the ESMP

The preparation of this ESMP is an obligation under Part III Sections 15 of the Environment Protection & Management Law of Liberia (2003) and the World Bank's safeguards requirements as outlined in Operational Procedure 4.01 (OP 4.01, Environmental Assessment) as outlined in the Project's ESMF. Generally, it is expected to provide guidance and recommendations for environmental and social safeguards as well as monitoring throughout the renovation and immediate post-renovation phase of the proposed project.

The main objectives of this ESMP are:

- identify the set of responses to potentially adverse impacts;
- determine requirements for ensuring that those responses are made effectively and in a timely manner; and
- describe the means for meeting those requirements;

Specific objectives (in line with Annex C of the World Bank's OP4.01 include:

- identify and summarize all anticipated significant adverse environmental impacts;
- describe each mitigation measure, including the type of impact to which it relates and the conditions under which it is required
- estimate any potential environmental impacts of these measures;
- Guide the project proponent in the establishment and implementation of a system of execution of programs to ensure EPA compliance;
- establish a method of monitoring and auditing environmental management practices during all phases of the development;
- create management structures that address the concerns and complaints of any Interested and Affected Parties with regards to the development;

- obtain environmental permits from the EPA; and
- inform the contractor bidding documents for the implementation.

2 Policy, Legal and Institutional Framework for ESM in Liberia

2.1 National Environmental Policy of 2003

The necessity for formulating a national environmental policy is in recognition of the severe impact of man's activities on all components of the natural environment, especially the influences of population dynamics, high density urbanization, resource exploitation and the further realization regarding the critical importance of restoring and maintaining environmental quality for the welfare and development of the people. The overall goal of the national environment policy is to ensure long-term economic prosperity of Liberia through sustainable social and economic development, which enhances environmental quality and resource productivity on a long-term basis that meets the requirements of the present generation without endangering the potential of future generations to meet their own needs. The aim of the national environmental policy is to ensure the improvement of the physical environment, improvement of the quality of life, and of the people, improvement of the economic and social living conditions of the entire citizenry, and present and future generations. It seeks to ensure reconciliation and coordination between economic development and growth with the sustainable management of the natural resources.

2.2 Act Adopting the Environment Protection and Management Law of Liberia, 2003

The Act adopting the Environment Protection and Management Law of the Republic of Liberia (Ministry of Foreign Affairs, 2003) (referred to as EPML) is the principle legislation covering environmental protection and management in Liberia. The EPML provides for a wide-ranging responsibility for environmental management by the EPA. One of the most prominent issues is the need for development of administrative procedures for the preparation of EIA to ensure effective environmental governance. The EPML also establishes the legal framework for the sustainable development, management and protection of the environment by the Environment Protection Agency, in partnership with regulated ministries and organizations and in a close and responsive relationship with the people of Liberia; and to provide high quality information and advice on the state of the environment and for matters connected therewith.

Section 24 of the EPML provides that:

- 1) The Agency shall, in consultation with the relevant Line Ministry, monitor:
 - a) All environmental elements of mitigation measures with a view of assessing and reporting potential environmental impacts;

- b) The mitigation measures for the operation of an industry, project or activity with a view to determining its immediate and long-term effects on the environment;
- c) The operation of all projects in existence at and after the commencement of this Law with a view of determining whether they comply with the provisions of this Law;
- 2) The operation of the project shall comply with the environmental mitigation plan;
- 3) The Agency, where it determines that the project does not comply with the provisions of this Act, shall require that the developer of a project or activity take remedial measures in a manner and within such time as Agency may determine, and may bring action before the Environmental Court or through the Ministry of Justice to enforce compliance;
- 4) An environmental inspector may enter upon any land or premises, at appropriate hours for the purpose of monitoring environmental effects upon the environment or any activities that are carried out on that land or premises in accordance with section 21 of the Agency act;
- 5) Monitoring reports shall be available for public inspection, without charge, at the Registry of the Agency.

2.3 Environment and Social Impact Assessment Guidelines of 2006

The Guidelines are intended to provide the EPA, sector agencies, private sector, NGOs, members of the public and consultants a set of approved guidelines for the conduct and review of Environmental Impact Assessments (EIA) in Liberia. The required administrative procedures and how they are arranged to reflect the intent of the law is the subject of the guidelines; also, to complement other sectoral EIA guidelines which may be produced by the EPA from time to time.

The guidelines clearly spelled out the ESIA process and components including a provision on Monitoring Program which provides that a detailed environmental monitoring program/plan should be defined to identify the necessary monitoring of activities to ensure proper process and performance efficiency of the project

2.4 LLA specific rules and regulations

The LLA does not have any specific social and environmental rules related to construction or renovation works. The LLA is bound to the laws, rules and regulations as outlined above. In addition, due to the financing provided by the World Bank, the LLA is bound to adhere to the World Bank safeguards policies as identified during project preparation.

2.5 World Bank Safeguards Policies triggered by the project

During the preparation of the Project an Environmental & Social Management Framework (ESMF) was developed, which reflects the safeguards policies and proposed mitigation measures.

Two World Bank policies have been triggered by this project including OP 4.01 (Environment Assessment) and OP 4.36 (Forests Policy). No major investments that could have potential impacts on the environment and social risks are expected to be undertaken. Some minor renovation works were expected under Component 1, which are represented by this activity. The Project has been categorized as B¹ and hence partial environmental assessment is required per the World Bank's safeguards policies.

Table 1: Summary of World Bank Safeguard Policy triggered by the project

No.	World Bank Safeguards Policy	Summary of Core Requirements
1.	Environmental Assessment (OP 4.01)	OP 4.01 has been triggered due to the fact that some of the project activities could involve minor renovation works to targeted LLA's offices around the country. The potential impacts of these activities are expected to be minor, and short-term. OP 4.01 requires among others that screening for potential impacts is carried out early, in order to determine the level of EPA to assess and mitigate potential adverse impacts. Of the Bank's project screening criteria, this Project is considered a Category B project, Partial Assessment.
		The ESMF states: "The project is not expected to have any significant impact on the environment and people. Component 1 of the LLAP which is geared toward institutional reforms may require some renovation and setting up of infrastructures as its Headquarter and the establishment of local offices. It could require the renovation of existing buildings. The renovation of buildings to house the LLA could require some civil works to be selected for the Headquarters and Local Offices. Renovation works could take place in areas that are already urbanized. They are unlikely to have significant negative impacts. Likely environmental concerns may be related to slight local modification in air quality, insignificant rise in ambient noise levels and vibration and management of waste during renovation work. Summary of potential environmental and impacts are discussed below.
		Flora and Fauna: The removal of the vegetative cover and cutting of trees (non-economic trees) are not expected under this project. So no impacts are expected with regard to vegetation cover and fauna, hence specific mitigation measures are not required.
		Soil Erosion: No civil work is anticipated under this project. Renovation works will be carried out on existing structures and in existing facilities. Soil erosion is not anticipated. No mitigation measures are required.

¹ A proposed project is classified as category B if the potential impacts are typically site specific, reversible in nature, less adverse than Category A projects, and for which mitigation measures can be designed more readily.

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Air Quality: Minor renovation works envisaged under this project will not lead to any noticeable change in air quality. Solid Wastes: Renovation works would generally generate construction wastes that need to be managed. The renovation works will entail mainly masonry, carpentry and electrical works required for upgrading and improving existing facilities. The level of construction wastes that may be generated as result of these activities are expected to be minimal but will still require proper disposal. Those of major concern will include but are not limited to empty paint and thinner cans, and chemicals used in wood processing to prevent termites such as creosote. Proper handling and disposal of these cans, some of which contain toxic substances, will need to be adhered to. Occupational Health and Safety: Though renovation works are expected to be light, workers may still encounter minor and, sometimes, major occupational health and safety issues that need to be addressed to avoid workplace accidents. The exact facility renovation and upgrading activities are not defined at this stage, but these activities would normally involve, for instance, working at height in case of roof repair work; issues related to electricity and welding safety; exposure to hazardous substances such as paints, thinners, creosote during painting and wood processing; and the risk of trip and fall as result of poor housekeeping in the workplace. The contractor will need to ensure safe and healthy work environment through proper arrangements and management. Some generic mitigation measures to be instituted are provided in the Environmental Mitigation and Monitoring Plan. " 2 Forests (OP 4.36) OP 4.36 (Forests) has been triggered because of the project's "work on

2.6 World Bank's Interim Guidance Note on COVID-19

In addition to the existing safeguards policies, the COVID-19 pandemic has led the World Bank to issue specific instructions in this regard. Hence, the works will be guided by the World Bank's 'Interim Guidance Note on COVID-19: COVID-19 Considerations in Construction/Civil Works Projects', issued on April 7 2020. The following summarizes the intent of the note and concrete measures are defined further below:

legislation". OP 4.36 does not apply to the proposed renovation works.

Projects involving construction/civil works frequently involve a large work force, together with suppliers and supporting functions and services. The work force may comprise workers from international, national, regional, and local labor markets. They may need to live in on-site accommodation, lodge within communities close to work sites or return to their homes after work. There may be different contractors permanently present on site, carrying out different activities, each with their own dedicated workers. Supply chains may involve international, regional and national suppliers facilitating the regular flow of goods and services to the project (including supplies essential to the project such as fuel, food, and water). As such there will also be regular flow of parties entering and exiting the site; support services, such as catering, cleaning services, equipment, material and supply deliveries, and specialist sub-contractors, brought in to deliver specific elements of the works. Given the complexity and the concentrated number of workers, the potential for the spread of infectious disease in projects involving construction is extremely serious, as are the implications of such a spread. Projects may

experience large numbers of the work force becoming ill, which will strain the project's health facilities, have implications for local emergency and health services and may jeopardize the progress of the construction work and the schedule of the project. Such impacts will be exacerbated where a work force is large and/or the project is in remote or under-serviced areas. In such circumstances, relationships with the community can be strained or difficult and conflict can arise, particularly if people feel they are being exposed to disease by the project or are having to compete for scarce resources. The project must also exercise appropriate precautions against introducing the infection to local communities.

3. Renovation Activities

3.1 Renovation Works Description

Under Annex I (Sections 6) of the Environmental Protection and Management Law (EPML) of Liberia, this project is classified under categories 13 (b) 'Major urban projects (multi-storey building, motor terminals, markets etc.)' and 24 (h) 'buildings with a total floor space of 500m² or more'. Major component of the project involves the renovation of four-storey building which is a proposed headquarters for the Liberia Land Authority. It includes the identification of cable areas, identification of risk-prone areas, and other areas relating to hazards, and other social issues amongst others.

3.2 Renovation Design

Renovation design requires the consideration of environmental standards according to which different facilities are designed as well as the specific and detailed design measures that will be implemented to meet the specified standards. Design is not an environmental management activity in its own right, but rather a means to achieving environmental management requirements. Various components of the project include: This project entails renovation works on the whole Liberia Land Authority (LLA) proposed headquarters. The contractor will develop a plan that specifies the minimum requirements to be implemented as per the scope of works, in order to minimize and manage the potential environmental impacts and ensure sound environmental management practices. The contractor will also be responsible for implementing the ESMP mitigation measures, which the LLA will monitor by using the framework for environmental monitoring throughout the renovation phase of the project. See Appendix A for the floor plans of the renovation site.

3.3 Application for EIA Permit/License

The necessary authorisations, permits and licences in relation to construction/renovations as prescribed under Annex 1 of the Environment Protection and Management Law of Liberia (EMPL) of 2003 will be to obtain an application for EIA permit/ license. LLA requested the

EPA's relevant technical staff to form part of a joint LLA/WB team to visit the proposed headquarters of the Liberia Land Authority at the intersection of Ashmun and Gurley Streets to determine the needed repairs and the structural soundness and environmental conditions of the site. The EPA, amongst other recommendations from the joint assessment, recommended that an environmental management plan be developed before the commencement of the building renovation; set plans for the management of waste that will be generated and the operation of the building during occupancy. This Environmental Management Plan has been prepared in response to EPA request.

3.4 Renovation Works

This project entails renovation works on the whole Liberia Land Authority (LLA) proposed headquarters. The building is currently empty and no LLA staff is working in the building. LLA staff will continue to work from its current location until the renovations are completed to enable the move of LLA staff. The renovations are expected to last five weeks. The major areas of works is summarized in the following table:

Table 2: Type of renovation works

Type of work	Activity
Mason Work	To provide 8" sand create blocks to seal up all air conditioner opening where necessary
Windows Work	To provide and replace existing damage jalousie windows with aluminum sliding windows at (9'3" X 5'0") complete with screen
Door Work	To provide and repair all damage wooden door frame
Floor/ Tiling Work	 Provide a lumpsum amount to grind existing faded terrazzo tiles, polishing, shining all corridors and entrances including some offices. To remove damaged tiles on the floors of some offices and replace them with new ones. To lay 24" x 24" and 12" x 12" tiles on the floors of some offices as per the BoQ.
Plumbing Work	To provide and recondition all existing plumbing systems, reactivating water line, checking leakages, making the entire system functional and locating the access points to the existing building.
Painting Work	 Ground Floor (Interior & Exterior) First Floor (Interior & Exterior) 2nd Floor (Interior & Exterior) 3rd Floor (Interior & Exterior) 4th Floor (Interior & Exterior) To scrape the walls, apply putty and repaint them with white latex paint. To provide and apply two coats of enamel paint to interior walls To provide and apply two coats of emulsion paint to exterior walls The wooden partition walls will be painted with clear varnish. The various steel doors, bars and windows will be painted with anti-rust paint
Electrical Work	To provide materials as per the BoQ in the implementation of the assignment.
Ceiling Work	To provide plywood ceiling sheets to replace all damaged ones as per the conditions as specified in the BoQ.
Wooden Wall Work	To provide and construct a wooden rubber, wood partition, wall using 2"X2" lumber, wire neat, etc. as per the BoQ.
Roofing Work	 To provide and replace damage aluminum alloy zinc with new ones due to leakages in exiting roof and fastener as per the BoQ Replace damaged 2" X 2" eaten up by termite

	 Provide and apply carboline to entire wooden work Provide 1" X 10" X 14" dressed facial board (hardwood) To remove the old roof and re-roof them by sloping them properly.
Internet Networking	To provide internet networking installation within the entire building as per the BoQ.

3.5 Installation of Facilities

The installation of facilities will comply with best safety practices that will consider the health and safety of workers in the work environment.

3.6 Construction Materials

Materials to be used include cement, tiles, steel rod, aluminum alloy zinc, plywood ceiling sheets, anti-rust paint, varnish, aluminum sliding windows, etc.

4. Stakeholder Consultations

In addition to the joint LLA/World Bank/EPA/Ministry of Public Works site visit outlined above, stakeholders were involved in the scoping phase to identify their greatest concerns about the renovation process. This was done to ensure that the environmental and social assessment takes full account of the priority concerns of the key stakeholders and more accurately the full range of potential social risks and impacts. Further, this was to provide opportunity for the project stakeholders to review and comment on the proposed renovation works; share concerns regarding the proposed project and potential areas of concern to avoid and or resolve conflict; obtain the cooperation of the community and other stakeholders in ESMP planning and implementation among others. Consultation efforts were placed on stakeholders most affected by the renovation, either because of their proximity to the project or their vulnerability to change. Feedback from the consultation was incorporated into the findings and mitigations to reduce risks and impacts and increase local social and economic benefits.

Consulted stakeholder groups and expressed concerns/issues are summarized in the following table.

Table 3: Stakeholders Consulted

Name of person consulted	Instituti on	Designatio n	Date consulted	Contacts	Issues raised/discussed	
Governmen						
Daniela Gray- Johnson	LLA	Director of Projects	May 13, 2020	gjohnsonda niela@gma il.com	No specific issue raised; Did not think that all of the risks listed would be applicable to the renovation works or the Liberian context	
Stanley N. Toe	LLA	Executive Director	May 15, 2020	snimleytoe @gmail.co m	Requested the use of in-house social safeguards specialist for most of the risks under the ESMP; Shared similar view like Daniela on risks application	
J. Adam Manobah	LLA	Chairman	May 12, 2020	Jadams.ma nobah@ya hoo.com	Stressed the relevance of the ESMP and the full involvement of the EPA; Highlighted the need for private security, nurses, and EPA certified agents; Prefer Monrovia City Corporation (MCC) and Liberia National Police (LNP) full involvement in the process	
Teakon Williams	LLA	Project Coordinato r – WB	April 13, 2020	teakon@ya hoo.com	Provided support to Consultant in the provision of needed logistics; Support to LLA Senior Management on submission to EPA.	
Randall M. Dobayou, II	EPA	Acting Chief Excutive Officer/ED	March 12, 2020	hweahjr@e pa.gov.lr	Prior to this assessment the EPA recommended that an environmental and social management plan be developed before the commencement of the building renovation; set plans for the management of waste that will be generated and the operation of the building during occupancy. (See Appendix C).	
Mr. Kieyee G. Bordolo	Ministry of Public Works	Chief Engineer	March 4, 2020		Prior to this assessment, the Ministry of Public Works was called to assess the structural integrity of the building. Using visual approach, it was observed that there are no structural defects on the building thereby making it safe for occupation. Nevertheless, they recommended an internal routine maintenance system of the structure when it is occupied. (See Appendix B)	
Community	Community stakeholders consulted					
Dr. Julius Y.Z.K. Williams	First United Methodis t Church	Senior Pastor	June 17- 23, 2020	jyzkwillia ms@yahoo .com	Several emails and reminders sent but no response	
Dr. Mator Kpangbai	United Methodis t	Vice President for Institutiona	June 22, 2020	+23188678 0067	Seemed indifference to the renovation effort. Referred the Consultant to President, Dr. Albert D. Coleman	

Dr. Albert B. Coleman	Universit y United Methodis t Universit y	l Developme nt and Advancem ent President	June 17- 23, 2020	Albert.cole man895@g mail.com	Several emails and reminders sent but no response
Ashmun Street Communit y	0508 Commun ity represent ation	Youth Chairman	March 5	077012485	 They are aware that the Ministry of Commerce has moved from the project site to the Ministerial Complex in Congo Town. Some of them are not aware of the fact that the present structure is to undergo renovation. Positively, he said, the renovation process will contribute immensely in improving the aesthetic nature of the building. Adversely, he said, the renovation of the building could hinder the free-flow of movement as the project site is surrounded by other busy structures. He noted also that the key areas of focus for surrounding residents should be noise vibration from equipment and control of movement. He suggested that contractors should employ a robust health and safety measures that adhere to national health and safety standards; and Community members should be incorporated in areas that require unskilled labor.
Philip T. Massaquo i	Commun ity Member	Elder	March 10	088678465 4	 Support Government effort in the renovation process Renovation will enhance business in the area
James Nyeleker	Commun ity Member	Assistant Youth Chair	March 11	077868216 2	 Generally in support of the renovation process Proposed that LLA recruit some of the community members during the hiring process
Bendu Scotland	Commun ity Member	Elder Council	March 12	077050896 8	 Proposed inclusion of women during renovation Renovation will be beneficial to the entire populace in the area

5. Potential Environmental and Social Risks, Impacts, and Mitigation Measures

5.1 Magnitude of impact

The sub project under component 1 supports renovation/rehabilitation of old building and therefore triggers OP/BP 4.01 Environmental Assessment. None of the sub project supported activities are expected to have significant, long term, or irreversible impacts on the natural and human environment, therefore the project is classified as environmental Category B.

5.2 Potential environmental and social benefits of the proposed subproject

Per ESMF, the institutional support to the LLA provided under this project will in the long term have positive environmental impacts, such as improved efficiency in resource use, administration and cost effectiveness of the land sector agencies. The Project's support to the renovation of LLA's new headquarters will contribute to enhanced efficiency of LLA's headquarter operations. Since the building is government-owned, it is a more sustainable solution than the currently rented building of the LLA. Further, the renovations will contribute to improved aesthetics in the area since the building will be freshly painted.

5.3 Potential adverse environmental and social impacts

The following Environment and Social Risk Mitigation Plan provides an overview of the potential adverse environmental and social aspects. It also includes proposed mitigation measures, risk rating, responsibilities and estimated costs.

Table 4: Environmental and Social Risk Mitigation Plan

Type of risk	Potential impact	Key receptor	Risk level	Proposed mitigation measures	Responsible	Estimated cost (US\$)
PLANNING PH	ASE					(0.50)
Site not suitable for renovations	Renovation works not implementable	LLA	Minor	 Site visits by LLA, World Bank, EPA, Ministry of Public Works, ESMP consultant, LLA's renovation works supervision consultant Preparation of floor plans Assessment of required works and bill of quantity 	LLA	0 (already implemented)
Contractor not aware of safeguards requirements	Non-compliance with ESMP	Contractor	Major	 Inclusion of ESMP as part of bidding documents Pre-briefing with LLA prior to start of renovations Joint LLA/contractor training of contractor and its staff 		0 (see separate training budget below)
RENOVATION Occupational health and safety	PHASE Injuries of workers	Workers	Major	 place a safety (OHS) officer at the site (who will also be responsible for training of workers – see more further below) a health and safety plan shall be drawn up to ensure the safety of workers ensure that all equipment is maintained in a safe operating condition a record of health and safety incidents shall be kept on site 	Contractor	0

Type of risk	Potential impact	Key receptor	Risk level	Proposed mitigation measures	Responsible	Estimated cost (US\$)
				 any health and safety incidents shall be reported to the employer immediately first aid facilities shall be available on site at all times workers have the right to refuse work in unsafe conditions material stockpiles or stacks shall be stable and well secured to avoid collapse and possible injury to site workers Personal Protective Equipment (PPE) shall be made available to all workers and use of PPE shall be made compulsory the minimum PPE includes: Hard hat Safety shoes 		
				 Overalls Gloves Reflector vests Certain operations may require additional PPE such as: Earplugs Eye protection glasses Face masks etc. 		
				 No person is to enter the construction site without the necessary PPE. Preparation of an emergency response plan, including to address risks associated in working with electrical cables 		
				 Provide first aid facilities Working at height: Provide a safe working platform with guardrails, fences, etc. – if not possible, provide properly installed personnel equipment such as rope access or safety harness and train staff/ensure only trained staff work at height 		

Type of risk	Potential impact	Key receptor	Risk level	Proposed mitigation measures	Responsible	Estimated
						cost (US\$)
Public Health & Site Safety	Injuries of residents	Residents and LLA Employees	Major	 the site shall remain fenced at all times potentially hazardous areas such as trenches are to be demarcated and clearly marked adequate warning signs of hazardous working areas shall be erected in suitable locations place adequate signboards to divert staff away from the construction works place flagmen to direct them away from the construction areas. emergency numbers for the local police, clinic/hospital and fire department shall be placed in a prominent area firefighting equipment shall be placed in prominent positions across the site where it is easily accessible. This includes fire extinguishers, a fire blanket as well as a water tank. Workers need to be trained on how to operate the firefighting equipment all flammable substances shall be stored in safe areas which do not pose an ignition risk. smoking may only be conducted in demarcated areas as agreed upon by the 	Contractor	2,500
Discharge of	Indiscriminate	Residents	Major	contractor's safety/OHS officer	N.C. Sanitors (Sanitation	6,000
Discharge of hazardous substances	Indiscriminate disposal and improper handling of	Kesidents	Major	hazardous substances need to be kept in a secured storage area which is bunded and/or has an impermeable floor layer that is able to contain spillages	Company)	0,000
	wastes including debris from			spill kits must be kept at the hazardous substance storage facility to treat and manage any spills immediately		
	demolished existing			all wastes must be disposed of at a licensed or approved hazardous landfill site (obtain)		

Type of risk	Potential impact	Key receptor	Risk level	Proposed mitigation measures	Responsible	Estimated cost (US\$)
	concrete and wood works, used/spent cement papers, spent wood, spent iron rods, spent roofing materials, demolished concrete works will pose dangers to community members especially children and elderly. • Uncollected demolished concrete and debris can pile up and block community access routes and cause injury to residents if uncollected.			necessary permits form these facilities prior to the start of the construction for disposal of hazardous waste, and also construction and demolition waste and provide adequate storage facilities at the site for collection of construction and demolition waste) • clear warning signage must be placed at renovation site.		COSE (COW)
Air Quality	Temporarily poor air quality due to the generation of dust	Residents, workers	Major	 activities shall only be undertaken during agreed working times to avoid the spreading of sand and dust into neighbouring areas the contractor shall be responsible for dust control (water spraying) on site to ensure no 	Contractor	0

Type of risk	Potential impact	Key receptor	Risk level	Proposed mitigation measures	Responsible	Estimated cost (US\$)
				nuisance is caused to the neighbouring landowners and the local community a speed of 40km/h shall not be exceeded on site the contractor must attend to complaints resulting from dust generation immediately the contractor should commence with rehabilitation of exposed soil surfaces as soon as practically possible after completion of earthworks all material resulting from excavation must be put in a location protected from wind and regularly sprinkled with water until reused		
COVID-19	Increased spread of the corona virus	Residents; workers	Major	 Identify a health officer as a focal point to deal with COVID-19 issues Establishing a system for controlling entry/exit to the site and limiting the number of workers on site at any one time Checking and recording temperatures of workers and other people entering the site or requiring self-reporting prior to or on entering the site Ensuring handwashing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places throughout site Providing cleaning staff with adequate cleaning equipment, materials and disinfectant. If a worker has symptoms of COVID-19 (e.g. fever, dry cough, fatigue) the worker 	Competent Health Professional from nearby Clinic (MedLink located on Randall Street – 500 yards from Construction site)	1,500

Type of risk	Potential impact	Key receptor	Risk level	Proposed mitigation measures	Responsible	Estimated cost (US\$)
Soil contamination	Potential soil contamination due to renovation works	Residents	Moderate	should be removed immediately from work activities and isolated on site. Providing masks to workers Ensuring physical distances cement mixing and the use of other chemicals must take place on impermeable and bunded surfaces where possible, ready mixed cement needs to be used for construction activities and cement trucks washed in a designated preferably off-site washing area any accidental spillages that occur on site must be contained, treated with absorbents and disposed of at a hazardous landfill site	Contractor	0
Gender based violence	Female workers are mostly at risk of sexual exploitation and sexual harassment from their male counterparts. Same for women and girls who go to sites to sell food, water etc.	Workers, residents	Moderate	Worker's code of conduct to provide sanctions for GBV to be established and to be enforced (which should promote awareness of the construction workers on the risk of spreading of sexually transmitted diseases)	Contractor	0
Pollution and poor aesthetics arising from wastes	Poor housekeeping at the site (leftover food wrappers, water bottle/sachet, fruit piles, etc.) can create aesthetic	Residents	Moderate	 sufficient waste bins shall be provided on site to encourage waste separation and for recycling purposes, if such systems are available refuse bins shall be placed at strategic positions to ensure that litter does not accumulate on site 	Contractor	0

Type of risk	Potential impact	Key receptor	Risk level	Proposed mitigation measures	Responsible	Estimated cost (US\$)
	nuisance and odor at the sites, breed flies and mosquitoes and health hazards in the immediate community and beyond.			 workers always need to be encouraged to use the waste bins provided, and littering should be prohibited engage with the municipal authorities or a private waste service provider with regards to the provision of waste skips skip waste containers should be kept on site to dispose of construction rubble containers must be removed when they fill up to maintain a clean site waste must be disposed of at a facility which is approved by the Liberia Environmental Protection Agency (EPA) if the waste disposal facility does not issue a record of the waste disposed, it is recommended that the contractor keep a record at the construction site of the volumes of waste taken to the facility burning of waste on site or in waste containers is prohibited hazardous waste may not be stored on site in excess of a 90-calendar day period 		
Crime	Theft at the site	Contractor, LLA	Moderate	 site must be secured at all times to prevent unauthorised access at the construction site there must be private security at the entrance gate controlling access to the site camp and such security measures must be approved by the relevant authorities 	Contractor & Contracted Security Firm	2,000
Labor Influx	Influx of workers from outside the community could be a potential	Residents	Minor	This renovation work is limited in scope and is of short duration and so, large labor force will not be required. However, if labor influx will occur, the contractor shall inform the LLA to determine adequate measures.	Contractor	0

Type of risk	Potential impact	Key receptor	Risk level	Proposed mitigation measures	Responsible	Estimated
						cost (US\$)
	source of					
	social tension					
	due to desire					
	of the local					
	community to					
	secure					
	employment					
	for the youth.					
	• Potential for					
	workers to					
	engage in					
	sexual					
	activities in					
	the					
	community					
	could lead to					
	transmission					
	of STDs,					
	sexual					
	harassment,					
	sexual					
	exploitation,					
	Gender based					
	Violence					
	(GBV), etc.					
Child labor	Children under-age	Residents,	Minor	Contractor policies to demonstrate anti child-	Contractor	0
	could be engaged	children		labor policy and implementation, ensuring that		
	by the contractor			a minimum age of 18 years of workers of the		
	for the renovation			construction company is met		
	works.					

Type of risk	Potential impact	Key receptor	Risk level	Proposed mitigation measures	Responsible	Estimated cost (US\$)
Sanitation	Poor sanitation could lead to transmission of diseases and could reduce wellbeing of the community nearby	Residents, workers	Minor	 install mobile chemical toilets on the site and place them in a bunded area – separate toilets for female and male (in case the work force includes both, male and female workers) establish hand washing facilities and soap to maintain good hygiene on site staff shall be sensitised to use these facilities at all times ablution facilities shall be within 100m from workplaces arrange that the toilets are serviced regularly by the service provider 	Contractor & Private Sanitation Firm	3,500
Traffic obstruction	Traffic congestion due to movement of construction vehicles impeding free movements of community dwellers		Minor	establish contact with the Traffic Division of the Liberia National Police to ensure ease of traffic to avoid inconveniences to inhabitants or residents proximal to the area where renovation activities are being carried out	Contractor & Monrovia City Police	1,000
Noise nuisance	Temporarily increased levels of noise and vibration	Residents; nearby First United Methodist Church	Minor	 the noise and vibration levels must be kept within acceptable limits. The noise and sound generated shall adhere to Liberia noise and vibration standard specifications and take account of nearby residents when work is performed at night no sirens and hooters may be utilized except where required or in emergencies. the playing of loud music at the accommodation camp is prohibited keep the local community informed of unavoidable noisy activities and their duration 	Contractor	2,800

Type of risk	Potential impact	Key receptor	Risk level	Proposed mitigation measures	Responsible	Estimated cost (US\$)
				 contractors should establish contacts with the authorities of the Church to ensure harmonious working relationship ensure renovation activities which generate noise do not coincide with important Church activities as determined by the Church. 		
Disturbances to the social environment (locality)	Conflict between contractor and the residents	Residents	Minor	 be courteous at all times when dealing with the neighboring community and their rights need to be respected at all times a complaints register should be kept on site and the contractor must attend to any public complaints as soon as possible make available, via notices and signboards, their contact details where complaints and issues can be lodged no interruptions other than those negotiated shall be allowed to any essential services 	Contractor	0
OPERATIONAL						
Traffic obstruction	Vehicles of LLA and LLA customers could hinder traffic	Residents, church, businesses	Major	Preparation of a plan/design for parking of LLA and customer vehicles	LLA	N/A (additional costs to be determined based on plan/design)
Fire hazards	Risk of fires affecting LLA building and neighboring buildings	LLA, residents in nearby buildings	Moderate	 Procurement of fire extinguishers and respective equipment Procurement of fire suppression system for server rooms 	LLA	N/A (to be determined as part of separate procurement)
Security	Risk of theft	LLA	Moderate	Continuation of existing security measures from current LLA building at the new building	LLA	0 (staff already part of LLA and

Type of risk	Potential impact	Key receptor	Risk level	Pro	oposed mitigation measures	Responsible	Estimated cost (US\$)
							paid for from LLA budget)
Preparedness for move	Lack of interior design could affect moving date and efficiency of moving process	LLA	Moderate	•	LLA to prepare adequate interior design drawings (incl. access to building for disabled customers)	LLA with technical assistance from the Integrated Land Administration and Management Project funded by the Swedish International Development Cooperation Agency (SIDA)	0 (financing of technical assistance provided by SIDA)
Ventilation	Limited ventilation in building could affect LLA staff	LLA	Moderate	•	LLA to ensure ventilation systems are included in the BOQ as appropriate and installed per manufacturer's instructions with adequate power supply available	LLA	N/A (costs to be covered by BOQ, not as part of ESMP budget)
Universal access	Limited access to customer service section for people with disabilities	People with disabilities	Moderate	•	LLA to ensure that BOQ/renovation design provides for ramps and railings at the main entrance to ensure that customer service section on the ground floor is accessible to people with disabilities; or if not feasible, LLA will develop policy/guidelines to clarify how people with disabilities will be served outside the LLA building	LLA	N/A (costs to be covered by BOQ, not as part of ESMP budget)
Transport of assets	Damage of LLA's physical assets during transport from current to new building	LLA	Minor	•	Transportation companies to be instructed and supervised per respective contract to ensure that moving will not lead to damage of physical assets	LLA	N/A (to be determined during contract negotiations with transport company)

Type of risk	Potential impact	Key receptor	Risk level	Proposed mitigation measures	Responsible	Estimated
						cost (US\$)
					TOTAL	19,300

The above presented Environmental and Social Risk Mitigation Plan (Table 4) and Appendix D (environmental rules for contractors) will form part of the contract between LLA and the contractor.

6. Periodic Monitoring Based on Permit and WB safeguards requirements

In order to ensure compliance with the Environmental Protection and Management Law, the government's Environmental and Social Impact Assessment Procedural Guidelines, and the Permit Conditions, there will be a robust monitoring program in place. Particular areas of focus will be on those mitigation measures and actions outlined in the Environmental and Social Risk Mitigation Plan under table 3 Periodic monitoring will be carried out by LLA's Social Safeguards Specialist assigned to the Project and LLA will assign a Senior Officer to take the role of the Environmental Specialist. Weekly monitoring visits will be conducted and more frequent visits will be conducted as needed depending on concrete issues identified. LLA will hire a construction works supervisor who will assist with the monitoring on a daily basis during the implementation.

Table 5: Environmental and Social Risks Management Plan: Monitoring Plan

Type of risk	Monitoring parameters	Frequency	Responsibilities	Estimated cost
				(US\$)
Occupational health	• Existence of health & safety plan	Prior to start of works and	LLA assigned Environmental Specialist and	US\$20 for fuel to
and safety	Records of health and safety incidentsExistence of PPE	throughout implementation phase (weekly)	LLA's Social Safeguards Specialist (with assistance from works supervision consultant)	conduct site visits
Public Health & Site	Existence of equipment and fencing as	Throughout implementation	LLA assigned Environmental Specialist and	US\$20 for fuel to
Safety	described in the Environmental and Social Risk Management Plan	phase (weekly)	LLA's Social Safeguards Specialist (with assistance from works supervision consultant)	conduct site visits
Discharge of hazardous substances	 Receipts from licensed or approved hazardous landfill site Existence of asbestos management plan if needed 	Prior to start of works and throughout implementation phase (weekly)	LLA assigned Environmental Specialist and LLA's Social Safeguards Specialist (with assistance from works supervision consultant)	US\$20 for fuel to conduct site visits

Type of risk	Monitoring parameters	Frequency	Responsibilities	Estimated cost (US\$)
Air Quality	Adherence to activities as described in the	Throughout implementation	LLA assigned Environmental Specialist and	US\$20 for fuel to
	Environmental and Social Risk	phase (weekly)	LLA's Social Safeguards Specialist (with	conduct site
	Management Plan		assistance from works supervision consultant)	visits
COVID-19	 Existence of handwashing facilities 	Throughout implementation	LLA assigned Environmental Specialist and	US\$20 for fuel to
	Temperature monitoring records	phase (weekly)	LLA's Social Safeguards Specialist (with	conduct site
	Face mask		assistance from works supervision consultant)	visits
	Adherence to physical distance			
Soil contamination	Adherence to activities as described in the	Throughout implementation	LLA assigned Environmental Specialist and	US\$20 for fuel to
	Environmental and Social Risk	phase (weekly)	LLA's Social Safeguards Specialist (with	conduct site
	Management Plan		assistance from works supervision consultant)	visits
Gender based violence	Existence of Worker's code of	Prior to start of works and	LLA assigned Environmental Specialist and	US\$20 for fuel to
	conduct and application thereof	throughout implementation	LLA's Social Safeguards Specialist (with	conduct site
	Watch for any indication of GBV	phase (weekly)	assistance from works supervision consultant)	visits
Pollution and poor	Adherence to activities as described in the	Throughout implementation	LLA assigned Environmental Specialist and	US\$20 for fuel to
aesthetics arising from	Environmental and Social Risk	phase (weekly)	LLA's Social Safeguards Specialist (with	conduct site
wastes	Management Plan		assistance from works supervision consultant)	visits
Crime	Existence of security measures	Throughout implementation	LLA assigned Environmental Specialist and	US\$20 for fuel to
		phase (weekly)	LLA's Social Safeguards Specialist (with	conduct site
			assistance from works supervision consultant)	visits
Labor Influx	Existence of labor influx	Throughout implementation	LLA assigned Environmental Specialist and	US\$20 for fuel to
		phase (weekly)	LLA's Social Safeguards Specialist (with	conduct site
			assistance from works supervision consultant)	visits
Child labor	Existence of anti child-labor policy and	Throughout implementation	LLA assigned Environmental Specialist and	US\$20 for fuel to
	application	phase (weekly)	LLA's Social Safeguards Specialist (with	conduct site
			assistance from works supervision consultant)	visits
Sanitation	Adherence to activities as described in the	Throughout implementation	LLA assigned Environmental Specialist and	US\$20 for fuel to
	Environmental and Social Risk	phase (weekly)	LLA's Social Safeguards Specialist (with	conduct site
	Management Plan		assistance from works supervision consultant)	visits

Type of risk	Monitoring parameters	Frequency	Responsibilities	Estimated cost
				(US\$)
Traffic obstruction	Proof of contact establishment with Traffic	Prior to start of works	LLA assigned Environmental Specialist and	US\$20 for fuel to
	Division of the Liberia National Police		LLA's Social Safeguards Specialist (with	conduct site
			assistance from works supervision consultant)	visits
Noise nuisance	Proof of contact establishment with the	Prior to start of works	LLA assigned Environmental Specialist and	US\$20 for fuel to
	authorities of the Church		LLA's Social Safeguards Specialist (with	conduct site
			assistance from works supervision consultant)	visits
Disturbances to the	Existence and use of complaints register	Prior to start of works and	LLA assigned Environmental Specialist and	US\$20 for fuel to
social environment		throughout implementation	LLA's Social Safeguards Specialist (with	conduct site
(locality)		phase (weekly)	assistance from works supervision consultant)	visits
			TOTAL	US\$300

7. Training of stakeholders on the ESMP implementation

The following ESMP training plan provides details on the training requirements regarding this ESMP.

Table 6: ESMP Training Plan

Training theme	Participants	Facilitator	Duration	Cost estimate
				(US\$)
Training on ESMP • Project Potential Environmental and Social impacts (per table 3 above) • Mitigation measures for potential	 Contractor Staff: Contractor Technical personnel (Safeguards Officer, Foreman, Site Engineer etc). LLA staff: 	Contractor safety (OHS) officer; LLA assigned Environmental Specialist; LLA works supervision consultant	1 day	1,000
project impacts (per table 3 above) • Monitoring of mitigation measures implementation • Reporting on	 M&E Staff Asset Management Affected residents: 		2 days	1,000
mitigation measures implementation Grievance Redress Mechanism of the project Roles and responsibilities for the ESMP implementation	TBD		1 day	1,500
r · · · · · · · · · · · · · · · · · · ·			TOTAL	3,500

8. Institutional Responsibilities for the ESMP Implementation

8.1 General responsibilities

Part III Sections 28 of the Act Creating the Environmental Protection Agency mandates that each Line Ministry or Agency shall establish an environmental unit to: ensure responsibility for compliance by that Line Ministry with the requirements of this Act; make comments on

environmental impact assessment in accordance with section (37) of this Act; liaise with the EPA on matters involving environmental management and all matters with respect to which co-operation or shared responsibility is desirable or required under this Act; each Line Ministry shall carry out its functions and duties in connection with the environment as prescribed in any law provided that such law does not conflict with the provisions of this Act.

Despite the provision of this law, the Liberia Land Authority has not yet established its Environmental Unit due to a number of challenges ranging from budgetary to technical constraints; and as such does not have the capacity for now to implement the ESMP. Therefore, for the sole purpose of the implementation this ESMP, the LLA is designating the PIU's Monitoring and Evaluation (M&E) Specialist as Environmental Specialist for the implementation of this ESMP who shall work together with LLA's Social Safeguards Specialist assigned to the Project. Both will be supported on a daily basis by the works supervision consultant hired by LLA for the renovation works.

The following is the arrangement for stakeholder responsibilities and roles in the ESMP implementation for the works.

Table 7: Stakeholder Roles and Responsibilities

Name of stakeholder	Roles and Responsibilities
World Bank	Project financier.
	Review of ESMP report and provision of IDA No Objection.
	Disclosure of ESMP at the Bank's external website.
	Occasional ESMP monitoring visits to the construction sites.
LLA	Overall responsibility over the Project and ensure compliance with the World Bank Safeguards Policies applicable to the Project
	Oversight responsibility for successful implementation of this ESMP.
	Preparation of the ESMP and its disclosure at the country level.
	 Training of stakeholders on the skills and knowledge required for successful implementation of the ESMP.
	• Supervision and ensuring compliance with the ESMP provisions by the works contractor and subcontractors.
	Monitoring of ESMP and reporting on the ESMP implementation to the World
	Bank on regular basis.
	Grievance redress.
EPA	• Carry out periodic inspections of all establishments and undertakings within such District limits of jurisdiction which manufacture, produce as by-products, import, export, store, sell, distribute, or use any substances and materials that are likely to have significant impact on the environment to ensure that the provisions of this Law are complied with
	Monitor and/or inspect projects/activities that are likely to significantly impact the environment
	 Point out all noncompliant activities or attitude of the project being inspected and document findings for action.
	Depending on the nature of the non-compliance, the EPA inspectors may take immediate action or refer the issue to the central office through the Inspectorate Section for action

Name of stakeholder	Roles and Responsibilities					
	Collaboration with other relevant ministries, agencies and NGOs in dealing with					
	environmental issues in the country.					
Contractor	Responsible for the actual renovation work.					
	Responsible for overall implementation and compliance with the ESMP					

8.2 Grievance Redress Mechanism (GRM)

LLA has established a GRM in November 2018, which provided the required details with regard to the provisions of the ESMF of June 2017. Tier I of the GRM establishes a Social Safeguard Desk (SSD). The SSD is managed by the LLAP Social Safeguard Specialist (SSS), who serves as the GRM Coordinator, supervising all Grievance Registers and ensuring receipt / registration, review, authentication of all grievances. He / she also serve at the first person to initiate the resolution process with the appropriate intervention.

All grievances that might occur under this activity shall be recorded in a logbook on site. Grievances shall be resolved on site and the solution be recorded in the mentioned logbook if possible. If solution on site is not possible the construction works supervisor hired by LLA shall be informed who shall forward the grievance to LLA's assigned Environmental Specialist and be referred to the SSD of the project's GRM. If the SSD is not able to resolve the issue, it shall be forwarded to the Grievance Resolution Committee (GRC). This shall be the last level in the LLAP grievance redress process, which will also apply to this specific activity. This national body shall serve as the last point of intervention where a party that is dissatisfy with the decision or finding of the CGC is referred. The committee shall review the complaints and supporting evidence and render a decision. The party objecting the decision of the GRC is at liberty to proceed to court for legal redress. The GRC shall comprise five members, with one CSO Representative as observer.

Relevant details of the GRM are outlined in the document 'Grievance Redress Mechanism For the Liberia Land Administration Project (LLAP)' of November 2018.

9. Implementation Schedule and Estimated Costs

The implementation schedule for the renovation works is as follows:

Table 8: Schedule and Estimated Costs

	2020					
	03	04	05	06	07	08
Preparation and clearance for hiring consultant to prepare floors						
plans and BOQ						
Preparation of floor plans by LLA						
Establishment of BOQ based on building assessment and floor						
plans						
Joint LLA/WB/EPA/MPW/SIDA site visit	X					

			1		
Preparation and clearance of ESMP consultant TOR	X				
Hiring of ESMP consultant	X				
Preparation and clearance of renovation works supervision	X				
TOR					
Hiring of renovation works supervisor	X				
Submission of first ESMP draft to World Bank and WB review		X			
Submission of second ESMP draft to World Bank and WB		X	X		
review					
ESMP Clearance by World Bank			X		
Submission of ESMP drafts to EPA		X	X		
Preparation of bidding documents	X	X	X		
Hiring of contractor			X		
Training on ESMP				X	
Implementation of renovation works				X	X
Monitoring of ESMP				X	X
Preparation of remaining designs, incl. parking space				X	
Final move of LLA to renovated building					X

The estimated cost for the ESMP implementation is US\$23,100.

This involves

- i. Implementation of environmental and social management mitigation: US\$19,300
- ii. Monitoring of the environmental and social impacts: US\$300
- iii. Training on the ESMP implementation: US\$3,500

10. Conclusion

This Environmental and Social Management Plan is consistent with Part III Sections 8 (1), 11 (1) 13 of the Environment Protection & Management Law of Liberia (2003). Generally, it documents the project's risk management planplan; and is expected to provide guidance and recommendations for environmental and social safeguards throughout the implementation of the proposed project.

The study proceeded with (a) desk review and search of relevant literature; (b) use of available data bases; (c) consultations involving engagement of administrators and technicians at the Liberia Land Authority; incorporation of initial comments from the Environmental Protection Agency of Liberia; (d) consultation with affected parties especially inhabitants or residents area the project site; and (e) collection of primary data on air and noise quality, as well as soil and surface water.

Finally, the study has established that the renovation of the LLA New Quarters Building can proceed safely once the environmental and social safeguards mitigation measures highlighted and recommended are adhered to during execution of the project.

11. References

Environment Protection Agency (2006) Environmental Impact Assessment. Procedural Guidelines.

Government of Liberia (2016): Act to Establish the Liberia Land Authority.

Government of Liberia (2017): Environmental and Social Management Framework. Liberia Land Administration Project.

Liberia Land Authority (2018): Grievance Redress Mechanism for the Liberia Land Administration Project.

Ministry of Foreign Affairs (2003): National Environmental Policy Act

Ministry of Foreign Affairs (2013): Act Adopting the Environment Protection and Management Law of the Republic Liberia (2003)

World Bank (1999): OP 4.01 - Environmental Assessment

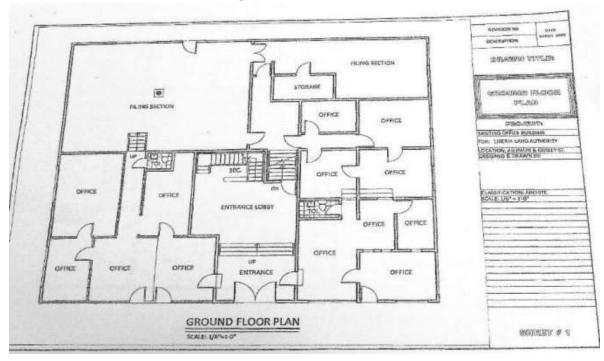
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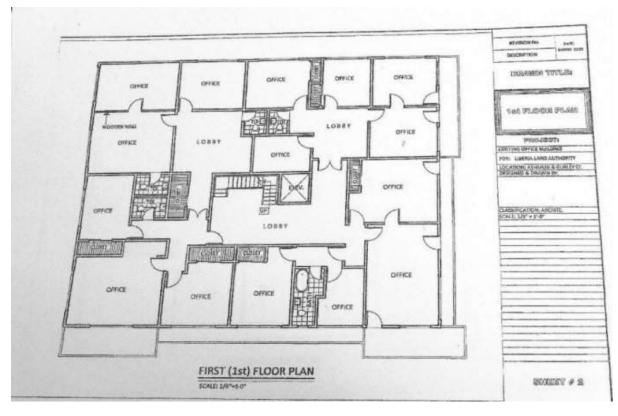
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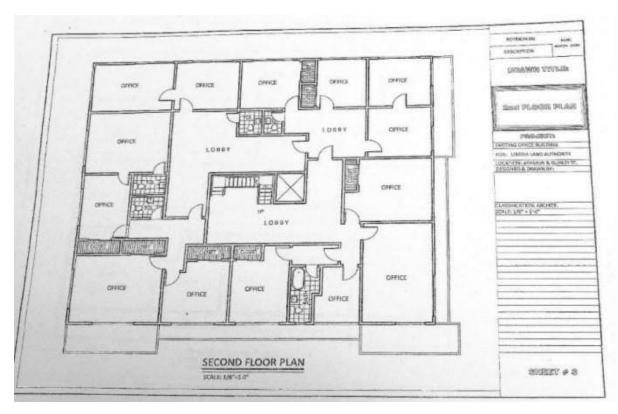
World Bank (2020): ESF/SAFEGUARDS INTERIM NOTE: COVID-19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS

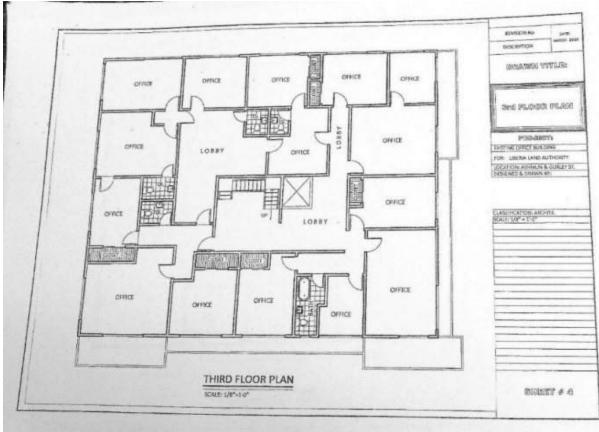
12. Appendices

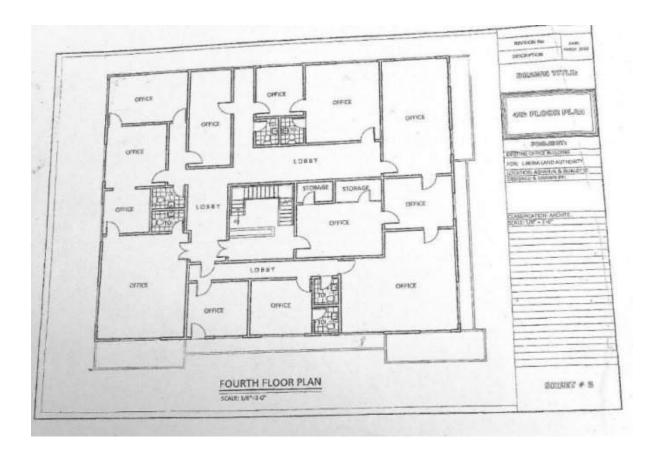
Appendix A: Technical Drawings











Appendix B: Ministry of Public Works Assessment Result



REPUBLIC OF LIBERIA MINISTRY OF PUBLIC WORKS P. O. BOX 9011, SOUTH LYNCH STREET MONROVIA, LIBERIA



MEMO

Hon. Clarence N. Wilson Sr. To:

Assistant Minister for Technical Services

From: Mr. Kieyee G. Bordolo

Chief Engineer

Date: March 4, 2020

Subject: Structural Assessment of an Existing building

With compliments,

Based on the mandate from you, two Structural Engineers visited the structure which was formerly occupied by the Ministry of Commerce. The building is located at the intersection of Ashmun and Gurley streets. The purpose of the assessment was to check the structural integrity of the building.

The finding is listed below:

The structure is a four-storey reinforced concrete building with roofing sheets on the roof of the top floor. The inspection to according the structural integrity was done using visual approach. After the assessment, it was absented that there are no structural defects on the building thereby making the building structurally safe for occupation.

However, I recommend an internal routine maintenance system of the structure when it is occupied to continue to keep the structural integrity intact.

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Appendix C: EPA Recommendations from the Joint Assessment



REPUBLIC OF LIBERIA ENVIRONMENT PROTECTION AGENCY P.O. Box 4024



Office of the Executive Director

4th Street Sinkor, Tubman Boulevard, 1000 Monrovia, 10 Liberia

ED/EPA-01/0273/20/RL

March 12, 2020

Atty. J. Adams Manobah, Sr. CHAIRMAN Liberia Land Authority Monrovia, Liberia

Dear Atty. Manobah, Sr.

I present my compliments and acknowledged receipt of your communication dated February 28, 2020 requesting the Agency's relevant technical staff to form part of a joint LLA/WB team scheduled to visit the proposed headquarter of the Liberia Land Authority located at Ashmun and Gurley Streets to determine the need repairs and the structural soundness and environmental conditions of the site.

In view of thereof and consistent with the overview of the environmental conditions of the assessed proposed site, the Environmental Protection Agency is pleased to share with you key recommendations from the joint assessment which are itemized below for your attention.

- Safety Observation: It is recommended that fire extinguishers be installed in all strategic areas of every floor within the building;
- b. E-waste Observation: Some wires within the building are exposed and will need to be disposed of. It is recommended that during renovation, the responsible authority work along with the EPA to be able to dispose of the scrape wires properly.
- c. Ventilation Observation: It was observed that there are other buildings near the LLA proposed office which is serving as a hindrance to the natural air that supposed to enter through the window of the ground floor office. Within this floor are office spaces that are made by partitions with enclosed walls which will not be conducive for office space. The building will have to rely on the use of air-conditioning all of the time, to provide ventilation to the occupants of the said office.
- d. Toilets: Most of the toilets in all of the floors lack a venting system, additionally, toilets area in closed proximity with all of the offices which will lead to the occupants of the nearby office being susceptible to the odor from the toilet after every use.
- e. It is recommended that an environmental management plan be develop before the commencement of the building renovation; to set plans for the management of the waste that will be generated and the operation of the building during occupancy.

Please accept the assurance of my highest esteem and consideration as we strive for environmental sustainability for now and successive generation.

Kind regards

andall M Donayou, II

ACTING CHIEF EXECUTIVE OFFICER/ED

Website: http://www.epa.gov.lr Mobile: +231880707024/+231778059829 Email: hweahjr@epa.gov.lr

Appendix D: Environmental Rules for Contractors

These Environmental Rules for Contractors are prepared for all the contractors to be engaged for any civil works renovation activities. The rules include provisions for proper management of construction sites, safe storage of construction materials and safe disposal of wastes.

General Considerations

- The contractor shall, in all his activities ensure maximum protection of the environment and the socio-economic wellbeing of the people affected by the project, whether within or outside the physical boundaries of the project area.
- Before any construction/renovation works begin, the contractor shall ensure that the relevant environmental and land acquisition certificates of authorization for the works have been obtained from Liberia's Environmental Protection Agency and/or Liberia Land Authority.
- In general, the contractor shall familiarize himself with the ESMP and the ESMF for the LLAP. Specifically, the contractor shall make every effort to follow and implement the recommendations and mitigation measures of the ESMP, and any supplemental safeguards document, to the satisfaction of the EPA, LLA and the Ministry of public Works, as applicable.
- The contractor shall always keep on site and make available to environmental inspectors or any authorized persons, copies of the ESMP and any other relevant documents for the monitoring and evaluation of environmental and social impacts and the level or progress of their mitigation.

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 ESMP.

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.

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.

Solid Waste Management

The Contractor shall institute a waste control and removal system for the site. All wastes shall be disposed of offsite at an approved refuse disposal site in consultation with the EPA. Burning of any waste on any construction site is forbidden. The Contractor shall supply waste bins throughout the site at locations where construction personnel are working. The bins shall be provided with lids and an external closing mechanism to prevent their contents blowing out and shall be scavenger-proof to keep out any animals that may be attracted to the waste. The Contractor shall ensure that all personnel immediately deposit all waste in the waste bins for removal by the Contractor. Bins shall be emptied on a frequent basis and waste removed to a temporary storage site where it shall be properly contained in water and windproof containers until properly disposed of. The bins shall not be used for any purposes other than waste collection.

In performing his activities, the contractor shall use the best practical means for preventing emissions of noxious or offensive substances into the air, land and water. He shall make every effort to render any such emissions (if unavoidable) inoffensive and harmless to people and the environment. The means to be used for making the emissions harmless or for preventing the emissions shall be in accordance with the ESMF and any other applicable safeguards document, and with the approval of the EPA and (if applicable) relevant Local Authority. Hazardous wastes shall be treated and disposed of in conformity with the national regulations and where applicable, with the supervision of qualified personnel.

Wastewater Management

The Contractor shall construct and operate the necessary collection and treatment facilities for wastewater to prevent pollution. In cases where water is mixed with oily waste, separators shall be installed. The oil should be stored in tanks or drums as hazardous waste and disposed of in approved manner. The Contractor shall dispose of collected wastewater in a manner agreed with the EPA and respective local officials.

The Contractor may discharge "clean" silt laden water overland, preferably vegetated land at the construction site and allow this water to filter into the ground. However, the Contractor shall ensure that he does not cause soil erosion as a result of any overland discharge.

Water from washing operations shall be collected in a sturdy container and disposed of in a manner agreed with EPA. Trucks delivering concrete or other construction supplies or equipment shall not be washed at the project site, nor in any other environmentally sensitive areas. All washing operations shall take place at a location where wastewater can be disposed of in an acceptable manner. Sanitary wastes shall be disposed into septic tanks.

Stockpiles, Borrow Pits and Quarries

Borrow pits and quarries shall be prohibited where they might interfere with the natural or designed drainage patterns. River locations shall be prohibited if they might undermine or damage the river banks, or require works in the wet area, which may carry too much fine material downstream. The

Contractor shall ensure that all borrow pits and quarries are restored, either to their original conditions or to semi-natural habitats that maintain useful conditions for wildlife.

Site Restoration

The Contractor shall ensure that all temporary structures, equipment, materials, and facilities used for construction activities are removed upon completion of the project. Any oil and fuel contaminated soil shall be removed and buried in waste disposal areas. Soak pits and septic tanks shall be covered and effectively sealed off and the sites shall be re-vegetated.

Health and Safety of Workers

The contractor shall protect the health and safety of workers by providing the necessary and approved protective clothing and by instituting procedures and practices that protect the workers from dangerous operations. The contractor shall be guided by and shall adhere to the relevant national labor regulations for the protection of workers. In addition, the contractors should indicate specific measures they will take during construction to prevent HIV-AIDS or other disease transmission by the work force.

Natural Habitats

In all relevant civil works projects, the contractor shall locate project facilities (permanent and temporary) so as to avoid or minimize the clearing of natural vegetation. The contractor shall enforce a strict prohibition on the washing of vehicles or changing of lubricants in waterways or wetlands.

Chance Finds Procedures for Physical Cultural Resources

If, during project construction, the contractor or project workers encounter archaeological relics, fossils, human remains, or other items of historical or other cultural value, the Contractor shall (i) temporarily suspend any works which might damage these items and (ii) notify the Supervising Engineer who will then notify the competent authority (Ministry of Cultural Affairs) for guidance regarding the appropriate next steps to evaluate, salvage, recover, protect, and/or document the items found.

Worker Behavior

To help ensure that good environmental and social practices are consistently followed throughout project construction/renovation and operation, all workers, operational staff, and contract personnel shall be prohibited from (i) speeding, (ii) weapons possession (except by security personnel), (iii) working without Personal Protection Equipment (PPE), (iv) inappropriate interactions with local people, (v) littering of the site and disposing trash in unauthorized places, (vi) using alcohol on-site or during working hours, (vii) sexual harassment, or (viii) setting unauthorized fires of any kind.

APPENIX E: Screening Checklist

S No	ISSUES	YES	NO	Comments
A.	Zoning and Land Use Planning			
1.	Will the subproject affect land use zoning and planning or conflict		X	
	with prevalent land use patterns?			
2.	Will the subproject involve significant land disturbance or site		X	
	clearance?			
3.	Will the subproject land be subject to potential encroachment by urban		X	
	or industrial use or located in an area intended for urban or industrial			
	development?			
B.	Utilities and Facilities			
4.	Will the subproject require the setting up of ancillary production		X	
	facilities?			
5.	Will the subproject require significant levels of accommodation or		X	
	service amenities to support the workforce during construction (e.g.,			
	contractor will need more than 20 workers)?			
C	Water and Soil Contamination			
6.	Will the subproject require large amounts of raw materials or		X	The project
	construction materials?		11	will require
				minor
				amounts of
				construction
				materials such
				as cement
7.	Will the subproject generate large amounts of residual wastes,		X	The project
<i>,</i> .	construction material waste or cause soil erosion?		21	will cause
	construction material waste of cause son crosson.			minor
				amounts of
				waste.
8.	Will the subproject result in potential soil or water contamination		X	Potential soil
0.	(e.g., from oil, grease and fuel from equipment yards)?		Λ	or water
	(e.g., from on, grease and fuer from equipment yards):			impacts are
				expected to be
				very minimal.
9.	Will the submissed lead to contamination of count and confere		V	very minimar.
9.	Will the subproject lead to contamination of ground and surface		X	
	waters by herbicides for vegetation control and chemicals (e.g.,			
10	calcium chloride) for dust control?		37	
10.	Will the subproject lead to an increase in suspended sediments in		X	
	streams affected by road cut erosion, decline in water quality and			
1.1	increased sedimentation downstream?		77	
11.	Will the subproject involve the use of chemicals or solvents?		X	
12.	Will the subproject lead to the destruction of vegetation and soil in the		X	
	right-of-way, borrow pits, waste dumps, and equipment yards?			
13.	Will the subproject lead to the creation of stagnant water bodies in		X	
	borrow pits, quarries, etc., encouraging for mosquito breeding and			
	other disease vectors?			
D.	Noise and Air Pollution Hazardous Substances			
14.	Will the subproject increase the levels of harmful air emissions?		X	
15.	Will the subproject increase ambient noise levels?	X		Minor and
			1	temporary

	T			
				noise level
				increases are
				expected due
				to
				construction
				vehicles and
				some works.
16.	Will the subproject involve the storage, handling or transport of		X	
	hazardous substances?			
E.	Fauna and Flora			
18.	Will the subproject involve the disturbance or modification of existing		X	
	drainage channels (rivers, canals) or surface water bodies (wetlands, marshes)?			
19.	Will the subproject lead to the destruction or damage of terrestrial or		X	
	aquatic ecosystems or endangered species directly or by induced			
	development?			
20.	Will the subproject lead to the disruption/destruction of wildlife		X	
20.	through interruption of migratory routes, disturbance of wildlife			
	habitats, and noise-related problems?			
F.	Destruction/Disruption of Land and Vegetation			
1.	Destruction Distribution of Land and Vegetation			
21.	Will the subproject lead to unplanned use of the infrastructure being		X	
	developed?			
22			1 77	
22.	Will the subproject lead to long-term or semi-permanent destruction		X	
	of soils in cleared areas not suited for agriculture?			
23.	Will the subproject lead to the interruption of subsoil and overland		X	
23.	drainage patterns (in areas of cuts and fills)?		71	
	dramage patterns (in areas of cuts and fins):			
24.	Will the subproject lead to landslides, slumps, slips and other mass		X	
	movements in road cuts?			
25.	Will the subproject lead to erosion of lands below the roadbed		X	
	receiving concentrated outflow carried by covered or open drains?			
26	Will de la		37	
26.	Will the subproject lead to long-term or semi-permanent destruction		X	
	of soils in cleared areas not suited for agriculture?			
27.	Will the subproject lead to health hazards and interference of plant		X	
-7.	growth adjacent to roads by dust raised and blown by vehicles?		11	
	growin adjacent to roads by dast raised and brown by veinces.			
G.	Cultural Property			
28.	Will the subproject have an impact on archaeological or historical		X	
	sites, including historic urban areas?			
20	Willel and Louis Advantage 12.		V	
29.	Will the subproject have an impact on religious monuments, structures		X	
	and/or cemeteries?			
30.	Have Chance Finds procedures been prepared for use in the	X	1	Chance finds
50.	subproject?	1 *	1	procedures
	supproject.		1	are part of
				-
				II.
			1	but it is highly

				unlikely that historic relicts will be found in an existing building which has been used until recently by another government entity.
Н.	Expropriation and Social Disturbance			
31.	Will the subproject involve land expropriation or demolition of existing structures?		X	
32.	Will the subproject lead to induced settlements by workers and others causing social and economic disruption?		X	
33.	Will the subproject lead to environmental and social disturbance by construction camps?		X	
S No	ISSUES	YES	NO	Comments
1.	Is the subproject located in an area with designated natural reserves?		X	
2.	Is the subproject located in an area with unique natural features?		X	
3.	Is the subproject located in an area with endangered or conservation-worthy ecosystems, fauna or flora?		X	
4.	Is the subproject located in an area falling within 500 meters of national forests, protected areas, wilderness areas, wetlands, biodiversity, critical habitats, or sites of historical or cultural importance?		X	
5.	Is the subproject located in an area which would create a barrier for the movement of conservation-worthy wildlife or livestock?		X	
6.	Is the subproject located close to groundwater sources, surface water bodies, water courses or wetlands?		X	
7.	Is the subproject located in an area with designated cultural properties such as archaeological, historical and/or religious sites?	X		A church is nearby but given the nature of inhouse renovations, impacts are temporary (i.e. potential minor traffic and noise

				issues during
				renovations)
8.	Is the subproject in an area with religious monuments, structures and/or cemeteries?	X		See above
9.	Is the subproject in a polluted or contaminated area?		X	
10.	Is the subproject located in an area of high visual and landscape quality?		X	
11.	Is the subproject located in an area susceptible to landslides or erosion?		X	
12.	Is the subproject located in an area of seismic faults?		X	
13.	Is the subproject located in a densely populated area?	X		Renovation site is within the city center of Monrovia.
14.	Is the subproject located on prime agricultural land?		X	
15.	Is the subproject located in an area of tourist importance?		X	
16.	Is the subproject located near a waste dump?		X	
17.	Does the subproject have access to potable water?	X		
18.	Is the subproject located far (1-2 kms) from accessible roads?		X	
19.	Is the subproject located in an area with a wastewater network?	X		
20.	Is the subproject located in the urban plan of the city?	X		The renovations will not change the nature of use of the existing building, which was used as a government building before. Respective permits have been granted and are therefore aligned to urban plans.
21.	Is the subproject located outside the land use plan?		X	