



Republic of Liberia  
Liberia Land Authority

Environmental & Social Management Framework (ESMF)  
LIBERIA LAND ADMINISTRATION PROJECT  
(LLAP)

**June 2017**

**LIST OF ABBREVIATIONS**

BP	Bank Procedure
CNDRA	Center for National Documents and Records Agency
DLSC	Department of Lands, Survey and Cartography
EA	Environmental Assessment
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EMS	Environmental Management Systems
EPA	Environmental Protection Agency
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
FDA	Forestry Development Authority
GIS	Geographic Information System
GOL	Government of Liberia
LC	Land Commission
LLA	Liberia Land Authority
LLAP	Liberia Land Administration Project
MIA	Ministry of Internal Affairs
MME	Ministry of Mines and Energy
NGOs	Non-Governmental Organizations
OP	Operational Policy

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## EXECUTIVE SUMMARY

### **Introduction**

This report presents an Environmental and Social Management Frame (ESMF) for the proposed Liberia Land Administration Project (LLAP) in support of one of the critical constraints to Liberia's sustained and inclusive growth - land administration, including land ownership and land tenure security. To address this constraint and many other constraints in the land sector, several laws and policies have been enacted, while others, including the Land Right Act are pending enactment.

A proposed Land Rights Act to legally recognize customary land ownership has been drafted and submitted to the National Legislature since 2014 for passage. It is currently under consideration at the legislature after a series of nationwide consultations with relevant stakeholders. Up to date, land rights remain poorly defined, with many rural lands having overlapping and unresolved ownership, in particular with regards to Tribal Lands Certificates (TLC) and mining, forestry and agriculture concessions. The situation is even more complex given the fact that the implementation mandate for land administration and management is spread across a number of agencies, including: Department of Lands, Survey and Cartography (DLSC) of the former Ministry of Lands, Mines and Energy (now Ministry of Mines and Energy); Center for National Documents and Records Agency (CNDRA); Probate courts; Ministry of Public Works; Liberia Revenue Authority; Liberian Institute for Statistics and Geo-information Services (LISGIS); Ministry of Internal Affairs; Municipalities and local authorities; and other sectorial ministries and agencies that are responsible for their own regulatory and land use planning.

To address some of the challenges outlined, the Government of Liberia created a national Land Commission in 2009 to explore and analyze Liberia's land tenure issues and propose policy and legal reform. The term of the Land Commission expired in January 2016 when a new body, the Liberia Land Authority (LLA) was created to replace it. With the passing of the LLA Act by the Legislature in October 2016, the LLA has the legal mandate for land administration in Liberia. Even though the LLA has been legally established, its transition phase and operationalization have not yet started. To support the ongoing reforms in the land sector, the Liberia Land Administration Project (LLAP) is being developed with support from the World Bank.

### **Project Development Objective**

The Project Development Objective is to strengthen the institutional capacity of the Liberia Land Authority and establish a land administration system.

### **Project Components**

The Land Administration Project has four components. Summary of the proposed components are listed below:

Component 1: Support to the Liberia Land Authority: Support the operationalization of the LLA and its core responsibilities, including but not limited to: land laws/regulations and administrative procedures; business systems, plans and processes as well as a strategic investment strategy for financial sustainability; capacity building; communication and awareness raising; and acquisition of office equipment, furniture, supplies and vehicles necessary for conducting the work of the Project.

Component 2: Support for inventory and development of policy for tribal land certificates: Project support will focus on conducting an inventory and analysis of tribal land certificates in five counties (yet to be determined). The documentation activities will include a thorough communication strategy to ensure that community members understand that this is purely a documentation exercise without any legal implications. A central database will be developed to capture existing inventories and inventories established under this Project.

**Component 3: Development of a Land Administration System:** Project support will focus on developing strategies and options for a land information and administration system for Liberia, which may include studies of legal arrangements (such as title versus deeds registries), technology for gathering and recording land rights, and land information platforms for managing and utilizing land records and rights. Support will also focus on the establishment of a geodetic network as a common referencing system for all surveys, mapping, engineering, and construction projects.

**Component 4: Project Coordination, Monitoring and Evaluation:** The project is expected to be implemented through a Project Implementation Unit (PIU) under the LLA. As such, this component will be used to support fiduciary and monitoring and evaluation functions and other operational costs required for project implementation. This component will also include the baseline, social assessment, mid-term and end-of-term evaluations.

### **Project Area Description**

The Project scope is national and field work will be limited to Component 2. The inventory of tribal land certificates under Component 2 will involve data gathering in a limited number of not yet determined counties. A detailed description of the biophysical environment is not included in the ESMF since all the activities, except minor renovation works on existing infrastructures (LLA offices), will be very low impact activities with little or no impact on the environment and people. A social assessment will be undertaken in year one of project implementation as part of the baseline study which will provide more information on the socio-economic environment, which is very important in the context of this project.

### **Legal and Institutional Framework**

The preparation of this ESMF takes into consideration applicable policies and legislation in the context of Liberian law and policies as well as the World Bank safeguards policies. The ESMF is informed mainly by the Environment Protection and Management Law of Liberia, the Environmental Impact Assessment (EIA) guidelines, and the relevant safeguards policies of the World Bank.

Several institutions will be involved in the implementation of this project and the ESMF. The Liberia Land Authority will be the principal agency implementing this project. Other institutions that will be involved in ensuring safeguards implementation and compliance is the Environmental Protection Agency (EPA). The World Bank through its project supervision missions will monitor safeguards implementation as required.

### **World Bank Policies and Project Category**

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. While some minor renovation works are expected under Component 1, Component 2 will undertake policy support work with potential social implications that are unclear at the moment. The Project has been categorized as B and hence partial environmental assessment is required.

### **Potential Impacts**

The project components were analyzed in order to assess the potential impacts the project may have on the environment and people. Two of the four components of the components may generate some level of impacts. Minor renovation works on LLA facilities could be undertaken under Component 1. This will mainly involve masonry, carpentry and electrical works with minimal impacts on the environment and people. Potential impacts and risks including waste generation and occupational health and safety related issues will need to be addressed. Some level of construction wastes, including some potentially toxic and hazardous wastes such empty paint and creosote cans, will need to be disposed of properly. Though the renovation works are expected to be light, workers may still encounter minor and, sometimes, major occupational

health and safety issues daily that need to be addressed to avoid workplace accidents. The social implication of some activities under Component 2 is not fully understood at this stage. Outcome of the social assessment that will be undertaken during the baseline study to inform the ESMF on the social impacts, if any.

**Proposed Mitigation Measures**

This ESMF outlines processes that will be followed during project implementation to mitigate potential impacts on the environment and people. The ESMF contains an Environmental and Social Mitigation Plan (ESMP) as well as a screening checklist, which will be key in managing potential project impacts and evaluating impacts of individual project activities, respectively. Concerning the two main impacts identified, proper disposal of wastes generated, especially those containing potentially harmful substances, is key, while contractors will be required to ensure safe and healthy work environment through proper arrangements and management in order to safeguard workers’ and public safety and any other occupational health and safety issues that may arise.

**Grievance Redress Mechanism (GRM)**

The project proposes to make use of existing institutional structures under the LLA to facilitate the receipt and resolution of complaints during project implementation. This would be achieved through a 3-Tier arrangement.

- Tier 1: Complaints will be recorded by dedicated officers at (i) the Local offices of the LLA and (ii) the LLA headquarters in Monrovia
- Tier 2: Unresolved grievances may be referred to the Office of the Executive Director of the LLA. A team will be constituted including legal and land experts for resolution
- Tier 3: All unresolved grievances would be referred to the Board of Commissioners of the LLA for final determination. It is expected that an appropriate resolution would be made to the satisfaction of the complainant.

Where a complainant remains unsatisfied with the response or procedures of the project GRM recourse to the state courts becomes the final avenue.

**Stakeholder consultation**

Public consultations were held in selected towns including Caldwell, Brewerville and Paynesville where the local community members and their traditional leaders participated. Similar consultations took place in Monrovia for targeted institutions such as the EPA, CSOs and decentralized government ministries and agencies of the LLA during the preparation of the ESMF. In addition, joint stakeholder consultations were held in some places for the ESMF and on the Land Rights Bill.

Summary of Public Consultations

	<b>Local community/ targeted institution</b>	<b>Date</b>	<b>No of participants</b>	
1	Caldwell		18	
2	Brewerville		20	
3	Paynesville		23	
4	Taditional Leaders/ legal profession/CSOs		35	
5	EPA		12	
7				

## 1.0 INTRODUCTION

### 1.1 Background

Land and land related issues pose major constraints to Liberia's sustained and inclusive growth. Livelihoods of Liberians, particularly the rural poor, are impacted by or dependent upon land and land based resources. Lingering issues of unequal access to and ownership of land, which have persisted over Liberia's history, have contributed to economic and social inequities which in turn have exacerbated tensions and led to conflicts. The absence of a clear land rights policy has resulted in competing and often overlapping land rights.

The situation is even more complex in areas affected by mining, forestry and agriculture concessions. The Government of Liberia (GOL), recognizing the critical importance of land as an essential resource for effecting economic growth and revitalization, has embarked on an ambitious land tenure reform program through the establishment, by an Act of Legislature, of a Land Commission in 2009. The Commission has subsequently developed a national Land Rights Policy, which for the first time in Liberia's history clearly identifies and defines four distinct land rights categories (Public, Private, Government and Customary/Community). The Commission has subsequently drafted a Land Rights Act, which is currently before the Legislature for passage into law.

Implementation of the Land Rights Act, when enacted into law, will require the provision of land administration services to ensure that land is properly identified, associated rights established and recorded, and systems for managing this information put in place. Existing land administration systems are inadequate and inefficient and although significant improvements have been initiated during recent times, the current state of Liberia's deed registry is unsatisfactory and the provision of land information services is inadequate. To implement the Land Rights Act, a Liberia Land Administration Project (LLAP) was developed with support from the World Bank. As envisaged the LLAP will support the institutional capacity building of the Liberia Land Authority (LLA) and establish a land administration system.

The Liberia Land Authority (LLA) was established with the passing of the LLA Act by the Legislature in October 2016. The LLA has the legal mandate for land administration in Liberia. The LLA will subsume the Department of Lands, Surveys and Cartography (DLSC) under the Ministry of Mines and Energy, the Deeds Registry currently within the Center for National Documents and Records Agency (CNDRA), and relevant functions from the Ministry of Internal Affairs (e.g. County Land Commissioners). The LLA's main activities will focus on a) land policy and planning, b) provision of land survey, registration and mapping services, c) provision of land valuation services, d) creation of a national Land Information System, e) alternative land dispute resolution services, f) coordination of access to government and public land for investment and conservation projects, g) promotion of land use planning and zoning by local governments, and h) demarcation and titling of the customary land rights of local communities.

### 1.2 Project Components

Although not all the components will require an Environmental and Social Impact Assessment, they are summarized below to provide an overview:

#### **Component 1: Support to the Liberia Land Authority**

With the passing of the LLA Act by the Legislature in October 2016, the LLA has the legal mandate for land administration in Liberia. Even though the LLA has been legally established, its transition phase and operationalization have not started yet. The LLA will need support in key areas to become operational. Activities will focus on support to the operationalization of the LLA and its core

responsibilities, including but not limited to: land laws/regulations and administrative procedures; business systems, plans and processes as well as a strategic investment strategy for financial sustainability; capacity building; communication and awareness raising; establishment of decentralized offices of the LLA located across the country that could be renovated and furnished; and office equipment, furniture, supplies and vehicles necessary for conducting the work of the Project. Work on legislation will be informed by the planned social assessment to be undertaken in year one of project implementation and other consultations and will be sensitive to vulnerable or disenfranchised groups.

### **Component 2: Support for inventory and development of policy for tribal land certificates**

Tribal land certificates refer to a legal, procedural document issued by the County Land Commissioner under the 1973 Public Land Sale Law, certifying the consent of tribal authorities (chiefs, elders, etc.) to sell customary land through the Public Land Sale Program. While the Government introduced tribal certificates initially as a tool to enable customary land to be sold, many local Chiefs issued tribal certificates to community members under the assumption that the certificate guarantees their tenure security. The different understanding of the Government and the communities about the rights the certificates provide, has led to conflicts and undermined investment. Large, but unknown numbers of tribal certificates exist, but the total extent of areas covered by them is unclear. Inventories were completed in four counties and piloted in three other counties with support from USAID and SIDA. A full inventory process is necessary to provide a broader basis for the analysis of the extent and understanding of tribal certificates, the amount of customary land transferred to public land, and the overlap of the certificates with other forms of land rights. The data will also inform the development of a tribal land certificate policy, which will be necessary to establish a land administration system. The inventory of tribal certificates will be preceded by the social assessment, which will identify and inform on the associated social risks and impacts.

### **Component 3: Development of a land administration system**

Liberia does not have a system to record and manage land rights information. Further support and analysis to establish a land administration system is required, specifically with regard to customary land rights. The activities under this component will support assessments and pilots in key areas of the 2015 Land Administration Policy: survey and mapping; recording of land rights; valuation of land; land use planning; and management of government and public land. Project support will focus on necessary steps to establish a geodetic network. This component will also support assessments and pilots to determine best methods for collecting, recording and managing land rights information. This support will develop and begin implementing a road map including strategies and options for a land administration system leading to the establishment of a land administration system in Liberia (deed or title based). Activities to support land valuation could include the development of standards and procedures for the valuation of land and property. Further, a coordinated institutional framework for the management of both Government and Public Land could be supported under this component.

### **Component 4: Project Coordination, Monitoring and Evaluation**

The Project is expected to be implemented through a Project Implementation Unit (PIU) under the LLA. There is need to ensure that the LLA has adequate capacity to provide effective project management, adequate safeguards implementation support, fiduciary support (financial management and procurement), monitoring and evaluation of project activities and the establishment of a solid M&E framework. As such, this component will be used to support operational costs required for project implementation within the framework of the LLA. The project will also undertake the baseline study,



social assessment and the mid-term and end-of-project evaluations in order to assess performance and document important lessons to inform the design of future operations.

### 1.3 Objectives of the ESMF

The objective of the ESMF is to screen for potential environmental and social risks and impacts associated with the subprojects/activities; propose the mechanism and procedure for identifying and implementing measures that will prevent, minimize or help manage negative and compensate environmental and social impacts, monitor and report on the status of implementation of the plans and measures for better environmental and social outcome for any eligible subproject. The ESMF focuses specifically on:

- Policy, legal and administration framework;
- Description of the Project Environment;
- Assessment of potential environmental and social risks and Impacts (positive and negative) and Mitigation Measures;
- Public Consultation, Stakeholder participation and disclosure; and
- Environmental and Social Management Plan.

## 2.0 POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

This section reviews the national policies, regulations, procedures and legal provisions relating to the environment, land ownership or acquisition, resettlement and compensations. The reviews have been made against the World Bank safeguards policies' requirements. The relevant policies, legal and administrative frameworks considered are:

- Liberia Environmental Policy;
- The Environmental Protection Agency Act;
- Environmental Protection Agency Regulations and Procedures;
- National Land Rights Policy;
- The World Bank's policies and guidance on Environmental Assessment (OP 4.01) and Forests (OP4.36)

### 2.1 Liberia Environmental Policy Requirements

The environmental policy of Liberia hinges strongly on 'prevention' as the most effective tool for environmental protection. The policy aims at a sound management of resources and environment, and the reconciliation between economic planning and environmental resources utilization for sustainable national development. It also seeks, among others, to institute an environmental quality control and sustainable development programs by requiring prior environmental assessment of all developments, and to take appropriate measures to protect critical eco-systems, including the flora and fauna (contained) against harmful effects, nuisance or destructive practices. The adoption of this led to the enactment of the EPA Act of 2003; and subsequently the passing of the Liberia EIA Procedures into the EA Regulations.

### 2.2 The Environmental Protection Agency Act

The Environmental Protection Agency (EPA) Act grants the Agency enforcement and standards-setting powers, and the power to ensure compliance with the Liberia environmental assessment requirements/procedures. Additionally, the Agency is required to create environmental awareness and build environmental capacity as it relates to all sectors, among others. The Agency is also vested with the power to determine what constitutes an adverse effect on the environment or an activity posing a serious threat to the environment or public health, to require environmental assessments (EA), environmental management plans (EMP) etc. of an undertaking, to regulate and serve an enforcement notice for any offending or non-complying undertaking. The Agency is required to conduct monitoring to verify compliance with given approval/permit conditions, required environmental standard and mitigation commitments.

### 2.3 EPA Regulations and Procedures

The EPA Regulations combine both assessment and environmental management systems. The regulations prohibit commencing an undertaking/activity without prior registration and Environmental Permit (EP). Undertakings are grouped into schedules for ease of screening and registration and for the EP. The schedules include undertakings requiring registration and EP (Schedule 1), EIA mandatory undertakings (Schedule 2), as well as Schedule 5-relevant undertakings (located in Environmentally Sensitive Areas).

The Regulations also define the relevant stages and actions, including: registration, screening, Preliminary Environmental Assessment (PEA), Scoping and Terms of Reference (TOR), Environmental Impact Assessment (EIA), review of EA reports, public notices and hearings, environmental permitting and certification, fees payment, EMP, suspension/revocation of permit, complaints/appeals etc. As required, a project brief was prepared and submitted to the EPA for screening. Given the proposed project activities and level of potential impacts, a full impact study was required but further study was required to develop an Environmental Review Report. The EIA guideline is presented below in Figure 1.

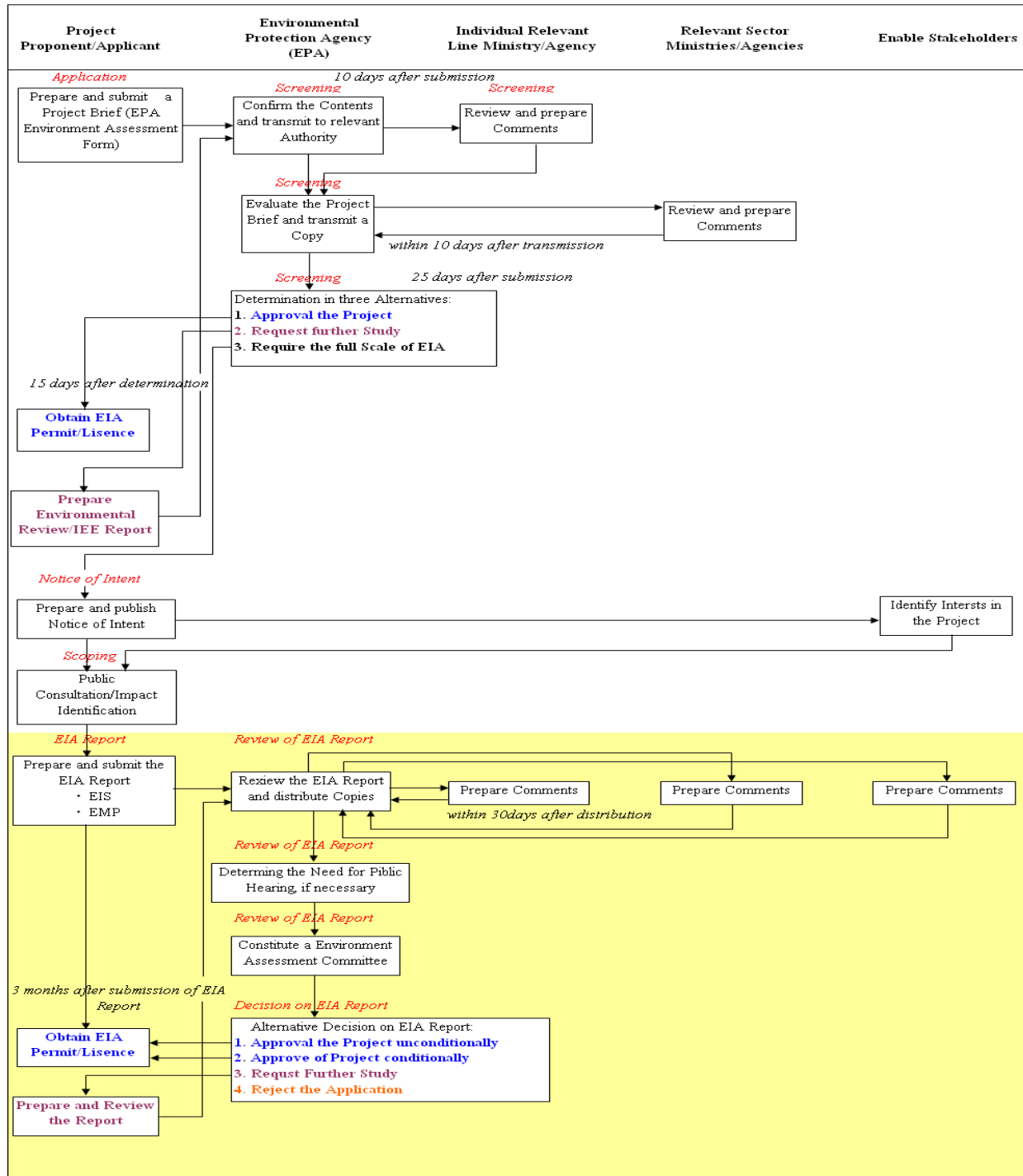


FIGURE 1 EIA GUIDELINES

## 2.4 National Land Rights Policy

A Land Rights Policy was endorsed by Government in 2013. The Policy provides recommendations for land rights in Liberia, based on four land rights categories: Public Land, Government Land, Customary Land and Private Land. The Policy recommends the full legal recognition of customary land rights by protecting customary and private land equally. The Land Rights Policy of Liberia aims at promoting the judicious use of the nation's land and all its natural resources by all sections of the Liberian society in support of various socio-economic activities undertaken in accordance with sustainable resource management principles and in maintaining viable ecosystems. Key policy provisions include facilitating equitable access to land, guaranteeing security of tenure and protection of land rights, ensuring sustainable land use and enhancing land capability and land conservation.

In 2014 the LLC (now the LLA) drafted a Land Rights Act, which is currently pending approval of the Senate. The Land Rights Act draft is based on the recommendations from the Land Rights Policy and reflects the four categories of land ownership as outlined above. The Land Rights Act draft seeks to ensure that customary land is given protection equal to private land for all Liberians. Further, the Land Rights Act draft prescribes the means by which land may be acquired, used, transferred and otherwise managed.

Possibly, the first formal legal recognition of community land in Liberia was the issuance of a deed in 1876 for conditional fee simple ownership. Fee simple ownership was subject to three conditions: (1) demonstrating "civilized" customs, (2) cultivating a certain amount of coffee trees, and (3) building on the land. The law that authorized the deed gave each male member of the tribe one town lot and thirty acres of farmland. These individual holdings likely remained subject to customary law, and thus within a larger community land tenure system. Individual or family-based holdings, even when a community has a deed for its land, are not uncommon as the customary tenure system persists, which allows for such holdings. This land administration setting makes Liberia likely the first African state or colony to formally recognize community land.

## 2.5 The World Bank Requirements

The World Bank's safeguard policies are designed to help ensure that programs proposed for financing are environmentally and socially sustainable, and thus improve decision-making. The Bank's Operational Policies (OP) are meant to ensure that operations of the Bank do not lead to adverse impacts or cause any harm.

Two of the Bank's Safeguard Policies, are have been triggered under the project: These are: Environmental Assessment (OP 4.01) and Forests (OP4.36)

### **Environmental Assessment (OP 4.01)**

OP 4.01 (Environmental Assessment) 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 exact number of offices to be renovated and the scale of renovation works are not yet established at this point. However, one of the key findings of the Institutional Audit of the key Liberian Land Governance Institutions conducted by USAID in 2006 indicates that the Land Commission's (now LLA) offices in various county administrative offices around the country are inadequate and would need upgrading to improve the work environment for the employees and to be able to hire additional staff to assist the planned County Land Boards in conducting tasks such as land dispute resolution. These renovations and upgrading works will be covered under Component 1. The potential impacts of these activities are expected to be minor, and short-term. The project support to the LLA will also include work on legislation. It is not known at this stage the type of legislation and the impacts it may have on access to

and use of forest resources. Given that the renovation works and support to legislation are not defined at this stage, this ESMF is prepared now, while specific Environmental Impact Assessment (EIA) will be prepared at the time of implementation when these activities are defined and their locations known. 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. The Bank's project screening criteria group projects into three categories:

- Category A – A proposed project is classified as Category A if it is likely to have adverse impacts that are significant and irreversible (based on type, location, sensitivity, and scale of the project and the nature and magnitude of its environmental impacts).
- Category B – 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.
- Category C – A proposed project is classified as a category C if there are minimal or no adverse impacts.

Of the Bank's project screening criteria, this Project is considered a Category B project, Partial Assessment. Under the national EIA regulation, this project did not require full EIA after screening of project brief. The proponent was requested to do further study and develop an Environmental Review Report for approval by the EPA. This is almost the equivalent of partial assessment under OP 4.01.

#### **Forests (OP 4.36)**

OP 4.36 (Forests) has been triggered because Component 1 of the project will provide support to the LLA, and this will include, among other activities, "work on legislation". It is not clear at this stage what "work on legislation" will entail, hence its impacts on access to and use of forest resources cannot be established. OP.4.36 has been triggered as a matter of precaution since work on legislation could have potential impacts on the health and quality of forest, affect the rights and welfare of people dependent on forests, or bring about changes in the management, protection and utilization of forest resources. No standalone safeguards instrument is required at this stage to address the triggering of this OP apart from the ESMF. However, during year one of project implementation a social assessment would be conducted to identify any potential social risks and impacts that may be associated with this type of land operation. Additionally, when "work on legislation" is defined at a later stage, and depending on its potential impacts, the necessary activity- and specific social and environmental mitigation plans will have to be completed, prior to implementing those activities of the project triggering this OP. These plans could include livelihood restoration plan, stakeholders' engagement plan, etc.

#### **Bank's Policy on Disclosure (BP 17.50)**

The Bank's policy on disclosure requires that all the people residing in the given areas of a project have the right to be informed of the proposed development project. Prior to project appraisal therefore, the summary of the study of the development action along with other relevant information should be disclosed nationally and in the project area as well as through the Bank website. The ESMF will be disclosed in a language and areas accessible to potential affected people and all stakeholders, including the project website, and then by the Bank's on its website upon authorization of the government. The ESMF will be distributed to relevant ministries, offices of the LLA, and other relevant public locations.

## **2.6 Administrative Framework and Institutional Roles and Responsibilities**

### 2.6.1 The Liberia Land Authority (LLA)

The Liberia Land Authority (LLA) was established with the passing of the LLA Act<sup>1</sup> by the Legislature in October 2016. The LLA has the legal mandate for land administration in Liberia. The LLA will subsume the Department of Lands, Surveys and Cartography (DLSC) under the Ministry of Mines and Energy, the Deeds Registry currently within the Center for National Documents and Records Agency (CNDRA), and relevant functions from the Ministry of Internal Affairs (e.g. County Land Commissioners). The LLA's main activities will focus on a) land policy and planning, b) provision of land survey, registration and mapping services, c) provision of land valuation services, d) creation of a national Land Information System, e) alternative land dispute resolution services, f) coordination of access to government and public land for investment and conservation projects, g) promotion of land use planning and zoning by local governments, and h) demarcation and titling of the customary land rights of local communities.

### 2.6.2 Ministry of Mines and Energy (MME)

The Vision and Mission of the MME (former Ministry of Lands, Mines and Energy) is to ensure the sustainable management and utilization of Liberia's lands and mineral resources for socio-economic growth and development.

The Ministry's activities and implementation of the current reforms are in pursuance of its set aims and objectives. These are:

- Develop and manage sustainable lands and mineral resources;
- To facilitate equitable access, benefit sharing from and security to land and mineral resources;
- Promote public awareness and local communities' participation in sustainable mineral and land use management and utilization;
- To review, update, harmonise and consolidate existing legislation and policies affecting land and mineral resources;
- To promote and facilitate effective private sector participation in land service delivery and mineral resource management and utilization;
- Develop and maintain effective institutional capacity and capability at the national, regional, district and community levels for land and mineral service delivery; and
- Develop and research into problems of mineral resources and land use.

### 2.6.1 Environmental Protection Agency

The Environmental Protection Agency (EPA) Act grants the Agency enforcement and standards-setting powers, and the power to ensure compliance with the Liberia environmental assessment requirements/procedures. Additionally, the Agency is required to create environmental awareness and build environmental capacity as it relates to all sectors, among others. The Agency is also vested with the power to determine what constitutes an adverse effect on the environment or an activity posing a serious threat to the environment or public health, to require environmental assessments (EA), environmental management plans (EMP) etc. of an undertaking, to regulate and serve an enforcement notice for any offending or non-complying undertaking. The Agency is required to conduct monitoring to verify compliance with given approval/permit conditions, required environmental standard and mitigation commitments.

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<sup>1</sup> GoL (2016): An Act to Amend Title 12, Executive Law of the Liberian Codes of Law Revised and to Add Thereto a New Chapter Creating the Liberia Land Authority.

## 2.6.2 Ministry of Internal Affairs

The Ministry of Internal Affairs, the Nation's oldest and largest institution, has seen significant reforms since its establishment in 1864. The changes were manifested in all key areas, including its Mandate, Nomenclature and Structure.

In the first few decades of the young Republic, the territorial influence of government could be extended and felt only a few hundred kilometres in-land from the coast. Interaction with the rural masses was very limited. Therefore, the institution's responsibility was, to Administer Local Governance which basically involved Collection of Taxes, Maintenance of Peace and Tranquillity, and Seeking the Welfare of the People. The Ministry of Internal Affairs plays a major role in public consultation, especially on land related issues.

## 2.6.3 Forestry Development Authority

The Forestry Development Authority is a state corporation established by an Act of the Legislature in 1976 with the mandate to sustainably manage and conserve all forest resources for the benefit of present and future generation. This mandate was strengthened through the National Resource Law of 1979. The 2006 Forestry Reform Law of Liberia is the current legal instrument that guides the management of forest resources in Liberia.

## 3.0 DESCRIPTION OF THE PROJECT ENVIRONMENT

### 3.1 Project Area

The Project scope is national and field work will be limited to Component 2. The inventory of tribal land certificates under Component 2 will involve data gathering in a limited number of counties to be determined during project implementation. A detailed description of the biophysical environment has not been undertaken in the development of the ESMF. This information is not relevant for assessing the risk and impacts the project may generate since all the activities, except minor renovation works on existing infrastructures (LLA offices), will be very low impact activities with little or no impact on the environment and people. Besides, most of the activities envisaged under this project are institutional strengthening activities with little or physical investments. A social assessment will be undertaken in year one of project implementation as part of the baseline study which will provide more information on the socio-economic environment, which is very important in the context of this project.

### 3.2 County Location and Size

Liberia lies on the southwest corner of the West Coast of Africa within the Mano river basin. It borders with the Atlantic Ocean in the south, Sierra Leone in the west, Guinea in the north and Cote d'Ivoire in the east. Its geographical coordinates are: latitudes 4°18' and 8°30' north and longitudes of 7°30' and 11°30' west. It covers an area of about km<sup>2</sup> 111,370, of which km<sup>2</sup> 96,160 are land and 1,505 inland water. It lies within the upper Guinean Forest region and prior to the impact of man was almost entirely covered by tropical moist forest.

Liberia has a population of 3.9 million (2010 EST) and Monrovia, its capital city is the country's largest city. There are 15 administrative counties in Liberia. The Project area covers the whole country (See Figure 2).



Figure 2: Map of Liberia



## 4.0 POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

### 4.1 Potential impacts on the physical environment

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 infra-structures 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.

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 (see Chapter 5).

### 4.2 Positive Environmental Impacts

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

- Proper demarcations of forest reserves, conservation areas, prevention of encroachment and reduced land degradation and loss of biodiversity

### 4.3 Potential impacts on the social environment

Component 2 of the project will support a full inventory process that is necessary to provide a broader basis for the analysis of the extent and understanding of tribal certificates, and to eventually establish a land administration system. This component will also include support to policies related to tribal land certificates. Activities to be supported under this component, though not yet finalized, may have some associated social impacts and risks which are not fully understood at this stage. A social assessment aimed at understanding the social risks and impacts the project may generate will be undertaken during the baseline study, prior to undertaking associated activities under Component 2.

While the potential negative risks and impacts of these interventions are not fully established at this stage, there are potential positive impacts the project hopes to achieve in the long term, including but not limited to improved land tenure security, increased land-related investment, improved efficiency of land resource use, and increased transparency in the land sector.

## 5.0 PROPOSED FRAMEWORK ENVIRONMENTAL MITIGATION AND MONITORING PLAN

The project components as well as the proposed activities are expected to be low impact as activities are not expected to have any impact of significance to the biophysical environment (land, air, water, flora and fauna). The scale of social impact the project may generate is not fully understood at this stage. The results of the social assessment will inform the ESMF regarding the social risks and impacts, if any, and the necessary plans to be developed.

**TABLE 1 FRAMEWORK ENVIRONMENTAL AND SOCIAL MITIGATION PLAN**

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
General Conditions	Notification, Worker and Public Safety	(a) Contractor will be responsible to ensure that work environment is safe and healthy (b) The LLA will be responsible to ensure that this ESMF is included in contractor's contract and implementation enforced (c) The public has been notified of the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works) (d) All legally required permits have been acquired for rehabilitation (e) The Contractor formally agrees that all work will be carried out in a safe and disciplined manner designed to minimize impacts on neighboring residents and environment. (f) Workers' PPE will be supplied with the required PPE for their work (g) Appropriate signposting of the sites will inform workers of key rules and regulations to follow. (h) Contractors will take appropriate measures to ensure that those who are not involved with renovation works are kept off site.
General renovation and upgrading Activities	Air Quality, noise, water quality, erosion	Except where activity and site screening results show that there might be negative impacts, no mitigation measures are so far required. Renovation works are expected to be of very low impact on these media even in the absence any mitigation measure.
	Wastes	(a) Waste collection and disposal pathways and sites will be identified for all major waste types expected from all activities. (b) Solid waste will be collected and disposed properly in accordance with Environmental Legislation of RA

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		(c) The records of waste disposal will be maintained as proof for proper management as designed. (d) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (e) Toxic and hazardous wastes including empty paint cans will dispose of in general community waste disposal sites (f) Open burning of wastes will not be allowed (g) Dumping of wastes in water courses and in other environmentally sensitive areas such as swamps/wetlands will not be allowed

## 5.1 Monitoring Plan

The objective of the monitoring plan is to establish appropriate criteria to verify the predicted impacts of the project, and to ensure that any unforeseen impacts are detected and the mitigation adjusted where needed at an early stage. The plan will ensure that mitigating measures are implemented. Specific objectives of the monitoring plan are to:

- Check the effectiveness of recommended mitigation measures;
  - Demonstrate that sub-project activities are carried out in accordance with the prescribed mitigation measures and existing regulatory procedures; and
  - Provide early warning signals whenever an impact indicator approaches a critical level.
- Oversight for the environmental and social management process of the sub-projects will be assured by the supervisory consultants in collaboration with the LLA.

The project’s safeguards consultants will prepare a long term monitoring strategy that will encompass clear and definitive parameters to be monitored. The monitoring plan will take into consideration the scope of the environmental and social sensitivity and the financial and technical means available for monitoring. The plan will identify and describe the indicators to be used, the frequency of monitoring and the standard (baseline) against which the indicators will be measured for compliance with the ESMP.

The verifiable indicators will include (1) completed checklists, (2) environmental briefs submitted to the EPA, (3) action plans prepared and implemented, (4) EPA permits, and (5) Number and quality of monitoring reports.

## 5.2 Framework ESMP Implementation and Monitoring Arrangements

### The Land Authority

The Liberia Land Authority was established by an Act in October 2016 replacing the Land Commission of Liberia established in 2009. The primary mandate of the Land Authority according to the Land Authority is to develop policies on continuous basis, undertake actions and implement programs in support of land governance, including land administration and management. The LLA will be the principal agency for the implementation of this project. The overall responsibility for implementing this ESMF therefore lies with the LLA. The LLA will be required to mobilize the required resources for full implementation of the ESMF and any other subsequent environmental and social action plan that may be developed in the course of the project implementation. While a full-time safeguards specialist may not be required given the low level of potential impacts, the LLA through its project implementation unit will be required to hire short-term consultant for safeguards support on an as-needed basis. In support of the ESMF implementation, the LLA will undertake a social assessment of the project during the baseline study, prior to undertaking activities related to Component 2, which may have the potential to generate

unspecified social risks and impacts which are not understood at this stage of the project. The LLA may be required to report to the EPA on a quarterly basis or as may be required by the EPA on implementation status of the ESMF and other action plans that may be developed during the course of project implementation.

#### The Environmental Protection Agency of Liberia

The EPA is responsible for monitoring, coordinating, and supervising the sustainable management of Liberia's environment. It is mandated to ensure the conduct of EIA for projects and programs that are likely to have significant adverse effects on the environment and people. The EPA is responsible for issuing permit and conducting compliance audits to ensure that permit conditions are adhered to. During the preparation of this ESMF, a brief was submitted to the EPA for review and approval as required by the EIA guidelines. The project brief was reviewed and the decision to conduct further study and develop an Environmental Review Report was reached. This ESMF has been prepared in fulfillment of this decision as well as the World Bank OP 4.01 requirements for Category B for which specific activities and sites are not defined at the project preparation stage. During project implementation, the EPA has the statutory mandate to conduct compliance audit to ensure conditions of the issued environmental permit are complied with by contractors as well as the LLA.

There are departments and units in other agencies and ministries that will be subsumed by the LLA. For example, the Department of Lands, Surveys and Cartography (DLSC) under the former Ministry of Land, Mines and Energy (Now Ministry of Mines and Energy) will be integrated in the LLA. Similarly, the Deeds Registry which currently sits within the Center for National Documents and Records Agency (CNDRA), and relevant functions from the Ministry of Internal Affairs (e.g. County Land Commissioners). Some of these ministries and agencies might be important partners in overall project implementation but may not have any specific roles with regards to safeguards implementation.

#### The World Bank

The Bank Task Team will be responsible for ensuring the timely commencement of the preparation of all necessary plans as may be required. This will include the social assessment to be conducted during baseline as well as plans that may be required during project implementation as a result of the social assessment and environmental screening which will be undertaken prior to implementing activities that are likely to have impacts on the environment and people. The task team will ensure that no contracts for works that have a physical impact are signed or reconstruction, or rehabilitation of proposed activities start without the required safeguards instruments in place.

## 6.0 Institutional Capacity for Safeguards Implementation and Training

The LLA does not have the capacity for safeguards implementation as it has no experience in implementing Bank-financed project. Basic safeguards training will be provided to the project implementation staff to be able supervise and monitor ESMF implementation. The project may hire a safeguards consultant to provide safeguards support on an as-needed basis.

## 7.0 SAFEGUARDS IMPLEMENTATION BUDGET

An estimated cost for implementing the ESMF including the ESMP has been developed. The safeguards implementation budget also includes estimated cost for safeguards related studies such as social

assessment that will be conducted during project implementation. The main components of the budget comprise the following:

- i. Training
- ii. Review of the Environmental & Social Management Framework (ESMF)
- iii. Implementation of Environmental and Social Mitigation Measures
- iv. Environmental and Social Audits and Screening
- v. Social Assessment

The estimated cost for implementing the framework ESMP and studies that may be conducted is US\$ 42,000. Breakdown per component is given in Table 2.

**TABLE 2 SUMMARY BUDGET FOR IMPLEMENTATION OF ESMP**

<b>Item</b>	<b>Estimated Cost (US\$)</b>
1. Training	5,000.00
2. Environmental Review and Permitting	2,000.00
3. Environmental and Social Mitigation Measures	10,000.00
4. Environmental and Social Audits and screening	15,000.00
5. Social Assessment	10,000.00
<b>Total:</b>	<b>42,000</b>

### Training

Training is key to successful implementation of any environmental management program. A budget of about US\$5,000.00 may be required annually to implement the training programs for institutions and persons required to implement the ESMP. This cost will cover transport, preparation of materials and allowance for a certified environmental evaluator to conduct the training exercises.

### Review and Permitting

Environmental Permit processing fee may be required in case the EPA will need to issue permit for this project. Given that the project activities are low impact activities which did not require a full ESIA study, this may not be required.

### Environmental and Social Audits and Screening

A lump sum of US\$15,000.00 is provided for implementing Environmental and Social audits and screening annually. This amount also includes fees for hiring short-term consultant for safeguards support when need be.

### Social Assessment

The baseline survey and social assessment to be prepared by the Project in year one will provide additional quantitative data on vulnerable groups and others. The Social Assessment is expected cost US\$ 10,000.

## 8.0 GRIEVANCE REDRESS MECHANISM

Grievance mechanisms provide a formal avenue for affected groups or stakeholders to engage with the project implementers or owners on issues of concern or unaddressed impacts. Grievances are any

complaints or suggestions about the way a project is being implemented. They may take the form of specific complaints for damages/injury, concerns about routine project activities, or perceived incidents or impacts. Identifying and responding to grievances supports the development of positive relationships between projects and affected groups/communities, and other stakeholders.

The World Bank/IFC standards outline requirements for grievance mechanisms for some projects. Grievance mechanisms should receive and facilitate resolution of the affected institutional or communities' concerns and grievances. The World Bank/IFC states the concerns should be addressed promptly using an understandable and transparent process that is culturally appropriate and readily acceptable to all segments of affected communities, at no cost and without retribution. Mechanisms should be appropriate to the scale of impacts and risks presented by a project.

Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. The management of grievances is therefore a vital component of stakeholder management and an important aspect of risk management for a project.

Projects may have a range of potential adverse impacts to people and the environment in general, identifying grievances and ensuring timely resolution is therefore very necessary. As such the ESMF has developed a grievance management process to serve as a guide during project implementation.

The project proposes to make use of existing institutional structures under the LLA to facilitate the receipt and resolution of complaints during project implementation. This would be achieved through a 3-Tier arrangement.

- *Tier 1:* Complaints will be recorded by dedicated officers at (i) the Local offices of the LLA and (ii) the LLA headquarter,
- *Tier 2:* Unresolved grievances may be referred to the Office of the Executive Director of the LLA. A team will be constituted including legal and land experts for resolution
- *Tier 3:* All unresolved grievances would be referred to the Board of Commissioners of the LLA for final determination. It is expected that an appropriate resolution would be made to the satisfaction of the complainant.

Where a complainant remains unsatisfied with the response or procedures of the project GRM recourse to the state courts becomes the final avenue.

## 9.0 STAKEHOLDER CONSULTATION

Public consultations were held in selected towns including Caldwell, Brewerville and Paynesville where the local community members and their traditional leaders participated. Similar consultations took place in Monrovia for targeted institutions such as the EPA, CSOs and Decentralized government ministries and agencies of the LLA during the preparation of the ESMF. In addition, joint stakeholder consultations were held in some places for the ESMF and on the Land Rights Bill.

**TABLE 3 SUMMARY OF PUBLIC CONSULTATION**

	<b>Local community/ targeted institution</b>	<b>Date</b>	<b>No of participants</b>	
1	Caldwell		18	
2	Brewerville		20	
3	Paynesville		23	
4	Taditional Leaders/ legal profession/CSOs		35	

	<b>Local community/ targeted institution</b>	<b>Date</b>	<b>No of participants</b>	
5	EPA		12	
7				

## 10.0 DISCLOSURE

The disclosure is a requirement from the World Bank safeguard policies as well as from national environmental assessment procedures, and therefore the report will be available to project affected groups, local NGOs, and the public at large. The LLA will make copies of the ESMF available in selected public places as required by law for information and comments as well as in the media. The ESMF will be announced and published on an official Government website.

## 11.0 Annexes

### Annex 1 Screening Checklist

S No	ISSUES	YES	NO	Comments
<b>A.</b>	<b>Zoning and Land Use Planning</b>			
1.	Will the subproject affect land use zoning and planning or conflict with prevalent land use patterns?			
2.	Will the subproject involve significant land disturbance or site clearance?			
3.	Will the subproject land be subject to potential encroachment by urban or industrial use or located in an area intended for urban or industrial development?			
<b>B.</b>	<b>Utilities and Facilities</b>			
4.	Will the subproject require the setting up of ancillary production facilities?			
5.	Will the subproject require significant levels of accommodation or service amenities to support the workforce during construction (e.g., contractor will need more than 20 workers)?			
<b>C</b>	<b>Water and Soil Contamination</b>			
6.	Will the subproject require large amounts of raw materials or construction materials?			
7.	Will the subproject generate large amounts of residual wastes, construction material waste or cause soil erosion?			
8.	Will the subproject result in potential soil or water contamination (e.g., from oil, grease and fuel from equipment yards)?			
9.	Will the subproject lead to contamination of ground and surface waters by herbicides for vegetation control and chemicals (e.g., calcium chloride) for dust control?			
10.	Will the subproject lead to an increase in suspended sediments in streams affected by road cut erosion, decline in water quality and increased sedimentation downstream?			
11.	Will the subproject involve the use of chemicals or solvents?			
12.	Will the subproject lead to the destruction of vegetation and soil in the right-of-way, borrow pits, waste dumps, and equipment yards?			
13.	Will the subproject lead to the creation of stagnant water bodies in borrow pits, quarries, etc., encouraging for mosquito breeding and other disease vectors?			
<b>D.</b>	<b>Noise and Air Pollution Hazardous Substances</b>			
14.	Will the subproject increase the levels of harmful air emissions?			
15.	Will the subproject increase ambient noise levels?			
16.	Will the subproject involve the storage, handling or transport of hazardous substances?			
<b>E.</b>	<b>Fauna and Flora</b>			
18.	Will the subproject involve the disturbance or modification of existing drainage channels (rivers, canals) or surface water bodies (wetlands, marshes)?			
19.	Will the subproject lead to the destruction or damage of terrestrial or aquatic ecosystems or endangered species directly or by induced development?			
20.	Will the subproject lead to the disruption/destruction of wildlife through interruption of migratory routes, disturbance of wildlife habitats, and noise-related problems?			



<b>F.</b>	<b>Destruction/Disruption of Land and Vegetation</b>			
21.	Will the subproject lead to unplanned use of the infrastructure being developed?			
22.	Will the subproject lead to long-term or semi-permanent destruction of soils in cleared areas not suited for agriculture?			
23.	Will the subproject lead to the interruption of subsoil and overland drainage patterns (in areas of cuts and fills)?			
24.	Will the subproject lead to landslides, slumps, slips and other mass movements in road cuts?			
25.	Will the subproject lead to erosion of lands below the roadbed receiving concentrated outflow carried by covered or open drains?			
26.	Will the subproject lead to long-term or semi-permanent destruction of soils in cleared areas not suited for agriculture?			
27.	Will the subproject lead to health hazards and interference of plant growth adjacent to roads by dust raised and blown by vehicles?			
<b>G.</b>	<b>Cultural Property</b>			
28.	Will the subproject have an impact on archaeological or historical sites, including historic urban areas?			
29.	Will the subproject have an impact on religious monuments, structures and/or cemeteries?			
30.	Have Chance Finds procedures been prepared for use in the subproject?			
<b>H.</b>	<b>Expropriation and Social Disturbance</b>			
31.	Will the subproject involve land expropriation or demolition of existing structures?			
32.	Will the subproject lead to induced settlements by workers and others causing social and economic disruption?			
33.	Will the subproject lead to environmental and social disturbance by construction camps?			
<b>S No</b>	<b>ISSUES</b>	<b>YES</b>	<b>NO</b>	<b>Comments</b>
1.	Is the subproject located in an area with designated natural reserves?			
2.	Is the subproject located in an area with unique natural features?			
3.	Is the subproject located in an area with endangered or conservation-worthy ecosystems, fauna or flora?			
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?			
5.	Is the subproject located in an area which would create a barrier for			

	the movement of conservation-worthy wildlife or livestock?			
6.	Is the subproject located close to groundwater sources, surface water bodies, water courses or wetlands?			
7.	Is the subproject located in an area with designated cultural properties such as archaeological, historical and/or religious sites?			
8.	Is the subproject in an area with religious monuments, structures and/or cemeteries?			
9.	Is the subproject in a polluted or contaminated area?			
10.	Is the subproject located in an area of high visual and landscape quality?			
11.	Is the subproject located in an area susceptible to landslides or erosion?			
12.	Is the subproject located in an area of seismic faults?			
13.	Is the subproject located in a densely populated area?			
14.	Is the subproject located on prime agricultural land?			
15.	Is the subproject located in an area of tourist importance?			
16.	Is the subproject located near a waste dump?			
17.	Does the subproject have access to potable water?			
18.	Is the subproject located far (1-2 kms) from accessible roads?			
19.	Is the subproject located in an area with a wastewater network?			
20.	Is the subproject located in the urban plan of the city?			
21.	Is the subproject located outside the land use plan?			

Signed by Environment Specialist:      Name: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Date: \_\_\_\_\_

Signed by Project Manager:              Name: \_\_\_\_\_  
 Title: \_\_\_\_\_  
 Date: \_\_\_\_\_

### Annex 2 Stakeholder Meeting in Caldwell

QUESTION ASKED	RESPONSES/CONCERNS
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<b>No.</b>		
1	Do you know the process of land acquisition?	About 85% of respondents were not clear of the entire process. Most relied on the surveyor to walk them through.
2	Do you usually participate in the survey process?	Almost 80% said they do not physically participate, because they rely on their chosen surveyor to participate.
3	How do you know if the metes and bounds on your deed is correct?	Almost all respondents accepted their documents to be correct because they believe their surveyors. Most sellers and buyers don't follow the surveyors.
4	Are you ok with the time and cost of the process?	About 60% of respondents agree that the process is too long because of the bureaucracy involved; and cost was high and uncertain.
5	How much influence, you think, Gov. officials and other influential personalities have on the process?	About 20% of respondents agree that Government officials, the courts and other Authorities use their influence or financial strength to skew a survey result in their favour.

Participants at Stakeholder Meeting in Caldwell

<b>Names</b>	<b>Contact</b>	<b>Position</b>
Henry d. May son Sr.	0886529764	Elder
Reuben R. Johnson	0777211732	Elder
Clarissa Q. Robertson	0777248478	Elder
Fredrick Gibson	0776567238	Elder
Saykay Koffah	0776167527	0776167527
J. Washington Kpor	0886577674	Elder
Branford J Weah	0886138679	Youth Chairman
Anna Teah	0888307591	Elder
James Holcombe	0886669828	Elder
Joe Mulbah	0880984027	Elder
Zwannah Dukuly	0770164135	Elder
Richer M. Tucker	077712751 91	Elder
Tomah Sabah	07771671067	Elder
Rebecca M. Tamara	-	Bassa Vice Governor
James Sarpu	0777975518	Elder
J. Benedict Glaywor	0777959 568	Elder
Abraham L. Sonnie	0775 954418	Vai Governor
Joanna Minor	0886621328	Elder

Photos of Participants at Stakeholders' Meeting in Caldwell



### Annex 3 Stakeholder Meeting in Brewerville

No.	QUESTION ASKED	RESPONSES/CONCERNS
1	Do you know the process of land acquisition?	About 60% of respondents were not clear of the entire process. Most relied on the surveyor to walk them through.
2	Do you usually participate in the survey process?	Almost 80% said they do not physically participate, because they rely on their chosen surveyor to participate.
3	How do you know if the metes and bounds on your deed is correct?	Almost all respondents accepted their documents to be correct because they believe their surveyors. Most sellers and buyers don't follow the surveyors.
4	Are you ok with the time and cost of the process?	About 60% of respondents agree that the process is too long because of the bureaucracy involved; and cost was high and uncertain.
5	How much influence, you think, Gov. officials and other influential personalities have on the process?	About 10% of respondents agree that Government officials, the courts and other Authorities use their influence or financial strength to skew a survey result in their favour.

#### Participants at Stakeholder Meeting in Brewerville

NAMES	CONTACT	POSITION
Henry Dukuly	0886997780	Elder
Momo Massaley	0880523071	Elder
E. Tonieh Williams	0886577958	Elder
Cyrus k. Domah	0886422483	Youth
Exodus C.P Gant	0880491822	Adult
Samuel Holder	0880278562	Youth
Varney S. Gant	0886762771	Elder
Robert S. Korfleh	0880703914	Youth
Francis Fayiah	0775125221	Youth
Prince Keibah	0776331071	Youth
Albert Nah	0886409377	Elder
Moses Sango	0886341424	Elder
Bill A. Brown	0886132743	Elder
Jerry W. Richards	0886812593	Asst. Mayor
Momo K. Kiazolu	0880122221	Elder
Francis C. Kemah	0888315779	Elder
Lasana C. Zoedua	0888301115	Elder
Emmanuel A. Williams	0886444314	Elder
Jamon Banks	0777412098	Elder
Momo K. Cassell	0776422508	Elder

Photos of participants at Stakeholders' Meeting in Brewerville



## Annex 4 Stakeholder Meeting in Paynesville

No.	QUESTION ASKED	RESPONSES/CONCERNS
1	Do you know the process of land acquisition?	About 90% of respondents were not clear of the entire process. Most relied on the surveyor to walk them through.
2	Do you usually participate in the survey process?	Almost 80% said they do not physically participate, because they rely on their chosen surveyor to participate.
3	How do you know if the metes and bounds on your deed is correct?	Almost all respondents accepted their documents to be correct because they believe their surveyors. Most sellers and buyers don't follow the surveyors.
4	Are you ok with the time and cost of the process?	About 60% of respondents agree that the process is too long because of the bureaucracy involved; and cost was high and uncertain.
5	How much influence, you think, Gov. officials and other influential personalities have on the process?	About 20% of respondents agree that Government officials, the courts and other Authorities use their influence or financial strength to skew a survey result in their favour.

### Stakeholder Meeting in the Township of Paynesville

Name	Contact	Position
Philip J. Beah	0886837151	Director Env. Health
Massa L. Addis	0886514286	Director/CSD
Alexander Gbarbea	0886774299	Social Worker
Lomenie Brown	0886389550	Inspector/PC
Yurmah Okai	0886453168	Elder
Lionel T. Weah	0886334173	Elder
Fatu B. G. Zinnah	0886644173	Elder
Simpkin S. Sneh	0886321133	Elder
Alousius Chieh	0886519560	Elder
Othello Moore	0777656676	Elder
James M. Kennedy	0886438188	Elder
Leatha M Dahn	0886535980	Elder
Tito T. Murray	0886872693	Elder
Robert H. B. Miller	0886897659	Elder
Prince G. Troh	0886453496	Youth
Manie Dolo	0886292077	Elder
Benjamin Barker	0777608811	Elder
Augustine B. Kpakolo	0886997044	Elder
Steven M. Mongen	-	Elder
Cynthia S. William	0777208045	Elder

Shad Wolozolah	-	Elder
Jesse Blaise	0886781693	Elder
Tornue Dorboryan	088684212	Elder

Photos of Participant at Stakeholders' Meeting in Paynesville





## Annex 5 Stakeholder Meeting with Civil Society Groups

No.	QUESTION ASKED	RESPONSES/CONCERNS
1	Do you know the process of land acquisition?	About 60% of respondents were not clear of the entire process. Most relied on the surveyor to walk them through.
2	Do you usually participate in the survey process?	Almost 80% said they do not physically participate, because they rely on their chosen surveyor to participate.
3	How do you know if the metes and bounds on your deed are correct?	Almost all respondents accepted their documents to be correct because they believe their surveyors. Most sellers and buyers don't follow the surveyors.
4	Are you ok with the time and cost of the process?	About 60% of respondents agree that the process is too long because of the bureaucracy involved; and cost was high and uncertain.
5	How much influence, you think, Government officials and other influential personalities have on the process?	About 10% of respondents agree that Government officials, the courts and other Authorities use their influence or financial strength to skew a survey result in their favour.

### Participants at Stakeholder Meeting with Civil Society Groups

Name	Contact	Position
Joseph B. Trinity	0880434789	MANIA-LIB
Adolphus Kawah	0886207962	CSO NETWORK/DWI
Tommy O. Goll	0886548906	MO-JL
Semsee Kiadii	0886604032	CSO

### Photos of Stakeholders' Meeting with Civil Society Group



## Annex 6 Stakeholder Meeting with Environmental Protection Agency

No.	QUESTION ASKED	RESPONSES/CONCERNS
1	Do you know the process of land acquisition?	About 60% of respondents were not clear of the entire process. Most relied on the surveyor to walk them through.
2	Do you usually participate in the survey process?	Almost 80% said they do not physically participate, because they rely on their chosen surveyor to participate.
3	How do you know if the metes and bounds on your deed are correct?	Almost all respondents accepted their documents to be correct because they believe their surveyors. Most sellers and buyers don't follow the surveyors.
4	Are you ok with the time and cost of the process?	About 60% of respondents agree that the process is too long because of the bureaucracy involved; and cost was high and uncertain.
5	How much influence, you think, Government officials and other influential personalities have on the process?	About 10% of respondents agree that Government officials, the courts and other Authorities use their influence or financial strength to skew a survey result in their favour.

### Participants at Meeting with the Environmental Protection Agency

Name	Contact	Position
Z. Elijah Whapoe	0886524657	Employee
J. Adama Manobah	0886623817	Employee
Jerry T Toe	0880662516	Employee
Earl Neblett	0886546345	Employee
Morris Gontor	0880854091	Employee
Joseph Yeneken	0886988782	Employee
Juluis B. Kawa	0886703467	Employee
Edward G. Wingbah	0886576150	Employee
McAlbert Donnie	0886960274	Employee
Abayaomi Grant	0886531903	Employee
Scholastica Doe	0886515567	Employee
Varney Conneh	0886531029	Employee

### Photos of Participants at Stakeholders' Meeting with Environmental Protection Agency (EPA)

