

REPUBLIC OF LIBERIA



FORESTRY DEVELOPMENT AUTHORITY



**LIBERIA FOREST ECONOMY PROJECT (LiFE-P)
[P508345]**

REVISED DRAFT

**ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK
(ESMF)**

**WITH ANNEX ON
LABOR MANAGEMENT PROCEDURES (LMP)**

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Abbreviations and Acronyms

AfDB	African Development Bank
AM	Accountability Mechanism
AWPB	Annual Work Plan and Budget
CBL	Central Bank of Liberia
CFMAs	Community Forest Management Areas
CFMBs	Community Forest Management Bodies
CFMPs	Community Forest Management Plans
CGC	Corporate Governance Code
CI	Conservation International
CLDMCs	Community Land Development and Management Committees
CPF	Country Partnership Framework
CRL	Community Rights Law
CSA	Civil Society Agency
EPA	Environmental Protection Agency
ESF	Environmental and Social Framework
EU	European Union
FAO	Food and Agriculture Organization
FCPF	Forest Country Partnership Framework
FDA	Forest Development Authority
FFI	Flora and Fauna International
FIF	Financial Intermediary Financing
FLEGT	Forest Law Enforcement, Governance, and Trade
FMCs	Forest Management Contracts
FMNR	Financial Management
FTI	Forestry Training Institute
GAC	General Auditing Commission
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GEMS	Geo-Enabling Initiative for Monitoring and Supervision
GHG	Greenhouse Gas
GIS	Geographic Information System
GIZ	German International Cooperation
GRS	Grievance Redress Service
HR	Human Resources
IDA	International Development Association
IDH	Sustainable Trade Initiative
IFC	International Finance Corporation
IPF	Investment Project Financing
IT	Information and Technology
LSEZA	Liberia Special Economic Zones Authority



LFSP	Liberia Forest Sector Project
LLA	Liberia Land Authority
LOC	Line of Credit
LRA	Land Rights Act
LRA	Liberia Revenue Authority
LRD	Liberian Dollar
M&E	Monitoring and Evaluation
MFDP	Ministry of Finance and Development Planning
MoA	Ministry of Agriculture
MoCI	Ministry of Commerce and Industry
MoJ	Ministry of Justice
MoL	Ministry of Labor
MOPs	Manual of Procedures
MoU	Memoranda of Understanding
NDC	Nationally Determined Contribution
NFRL	National Forestry Reform Law
NGOs	Non-Governmental Organizations
NIC	National Investment Commission
NRM	Natural Resource Management
NTFPs	Non-Timber Forest Products
NUCFDC	National Union of Community Forestry Development Committees
PAs	Protected Areas
PDO	Project Development Objective
PFMU	Project Financial Management Unit
PIU	Project Implementation Unit
POM	Project Operation Manual
PPP	Public Private Partnerships
PSC	Project Steering Committee
SBA	Small Business Administration
SCNL	Society for the Conservation of Nature of Liberia
SDGs	Sustainable Development Goals
SEA/SH	Sexual Exploitation and Abuse/ Sexual Harassment
SFM	Sustainable Forest Management
SMEs	Small and Medium Enterprises
SMFEs	Small and Micro Forest Enterprises
SOE	State-Owned Enterprise
SOP	Series of Projects
ToT	Training of Trainers
UNDP	United Nations Development Program
US	United States
USAID	United States Agency for International Development
USD	United States Dollar
WB	World Bank

ESMF – LMP LiFE-P (P508345)



WBG	World Bank Group
WCF	Wild Chimpanzee Foundation



Executive Summary

The World Bank will be supporting the Forest Development Authority (FDA) in implementing the Liberia Forest Economy Project (LiFE-P) project. The Project Development Objective of the Series of Projects (SOP) is to *“improve forest governance, expand community-managed forests and increase income and jobs for forest-dependent people in selected areas of Liberia”*. The SOP will retain the same PDO across all ensuing projects and will follow a consistent approach in terms of project design, ensuring maximum synergy and cross-learning through the different phases. This SOP 1 includes an IDA grant of US\$40 million and a PROGREEN grant of US\$ 5.4 million to address critical challenges facing Liberia’s forests and to unlock their economic, social, and environmental potential.

The project is the first of two operations under a SOP. A single-borrower SOP was selected over a stand-alone IPF or MPA for three reasons: (a) the institutional and country conditions do not yet support the structured commitment of an MPA; (b) SOP 1 is foundational and exploratory to help shape a solid institutional basis; and (c) the series-level objectives may evolve as SOP1’s evidence accumulates. The SOP approach allows the WB to support Liberia programmatically while gradually strengthening the sector’s strategic framework, institutional capacity, and governance, so the country can eventually engage in a more ambitious programmatic vehicle from a stronger foundation

Project Components. Component 1 will strengthen the enabling environment for sustainable, accountable and transparent forest management. Component 2 will create a pipeline of market-ready community forest enterprises by combining legal tenure and capable governance bodies (2.1), a productive and sustainably certified resource base (2.2), and stronger conservation and ecotourism assets (2.3). . Component 3 focuses on commercializing Liberia’s timber products and NTFPs by promoting sustainable production, transparent management, and competitiveness to unlock the forest sector’s potential to create more and better jobs. Together, these interventions will enhance governance, productivity, and climate resilience, while reducing the drivers of deforestation and degradation.

Exclusion Criteria: The project applies both geographic and activity-based exclusion criteria. Geographically, the project will not operate in areas with unresolved boundary disputes, active concession conflicts, or within core zones of formally gazetted national parks. Activities that would convert or significantly degrade natural habitats, cause involuntary resettlement or displacement, adversely impact cultural heritage, threaten biodiversity or sensitive ecosystems, or involve illegal trade in wildlife or other prohibited goods will not be financed under the project (Table 1).

Project Description and proposed activities

The LiFE-P is a Series of Projects (SOP) designed to promote sustainable forest management, strengthen forest governance, and unlock the economic potential of Liberia's forest sector for the benefit of communities and the broader economy. Under SOP1, the project is structured around four components implemented across six counties (the Northwest (Gbarpolu, and Grand Cape Mount counties); Central North (Rivercess, Grand Bassa counties); and Southwest (Grand Gedeh, Sinoe counties). Component 1: strengthens the enabling environment for sustainable and transparent forest management by improving interagency coordination and risk-based enforcement, enhancing the transparency and accessibility of concession and revenue data, modernizing FDA's institutional systems and regulatory processes, digitizing core licensing and chain-of-custody functions through LiberTrace, strengthening forest monitoring and GIS capacity, and supporting FDA's long-term fiscal sustainability. Component 2: supports sustainable forest resource development and resilient livelihoods through the establishment and



formalization of 20 Community Forest Management Areas under a clustered approach, the development of community forest management and business plans, promotion of Reduced Impact Logging (RIL), restoration of approximately 6,000 hectares of degraded lands and establishment of approximately 13,116 hectares of commercial plantations through community woodlots and rehabilitation of old-growth plantation, , delivery of nature-based matching grants for household and community livelihood enterprises, and enhanced management of Gola Forest National Park and Lake Piso Multiple Sustainable Use Reserve for ecotourism development preparedness. Component 3: catalyzes private investment in commercial forestry by strengthening forestry MSMEs through enterprise readiness support and results-based financing, upgrading the Forestry Training Institute into a Service Excellence Center to address sector-wide skills gaps, and promoting private investment through investment facilitation, PPP transaction advisory, and market intelligence collectively creating a more competitive, transparent, and inclusive forest economy capable of generating sustainable employment and broad-based economic growth in Liberia. Component 4 supports project management and implementation.

Purpose and Scope of ESMF

The project activities under SOP 1 will take place across three geographic clusters, the Northwest (Gbarpolu, and Grand Cape Mount, counties); Central North (Rivercess, Grand Bassa counties); Southwest (Grand Gedeh and Sinoe counties)¹ including selected protected areas - Gola Forest National Park and Lake Piso Multiple use Reserve, but the specific locations of subproject activities are not known at this stage. Since the exact locations and designs of these subprojects are not yet defined, this Environmental and Social Management Framework (ESMF) provides the procedures and tools to identify, assess, and manage potential environmental and social (E&S) risks once detailed information becomes available.

The ESMF presents the process for screening subprojects, determining risk levels, and preparing appropriate instruments such as Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs). It also defines institutional responsibilities, capacity-building measures, and monitoring arrangements to ensure compliance with Liberia's environmental laws and the World Bank's Environmental and Social Framework (ESF).

Sectoral Laws and Policies

The National Forest Reform Law 2006 (NFRL) of Liberia mandates the establishment of a protected forest areas network to cover at least 30 percent of the existing forested area of Liberia, representing about 1.5 million ha which provides a statutory basis for the forestry targets within the NDC. This is restated within Chapter 5 of Liberia's National Wildlife Conservation and Protected Area Management Law. Chapter 77 of the EPML provides for the protection of forests and provides a statutory basis for establishing protected forest areas. The EPML, NFRL, and NWL provide for the protection of forests and their associated wildlife. Considering that Liberia is a highly forested country with many areas covered with forest, the LLA has collaborated with the FDA of Liberia, the Ministry of Internal Affairs, the Bureau of Concessions, and the Ministry of Mine and Energy to ensure the land formalization of customary communities and the establishment of protected forest areas.

Liberia enacted the Liberia Land Authority (LLA) Act (2016), which centralizes land administration and management within the LLA. The Land Right Act was passed in 2019 and is being administered by the

¹ Based on an assessment conducted at preparation, four counties – Margibi, Bomi, Bong, and Montserrado – were not selected because their contribution to the project development objective would be limited: these counties have relatively lower remaining forest cover, more limited CFMA structures, and in the case of Montserrado and Margibi, an urban-peri-urban character that is not well suited to community-based forest economy activities



LLA to complement land reforms in Liberia, including land rights, management, and use. The Land Rights Act recognizes four categories of land ownership: customary land (communal holding), private land, government land, and public land. Subsisting with these categories is the unique land category called protected areas. The Land Rights Act provides security for tenure for all four categories of land in Liberia. In addition, the law recognizes customary rights. Customary land rights enable collective ownership of customary communities in the land, which includes land that has been used or possessed exclusively or continuously by the communities or some of its members for socio-cultural and economic purposes for at least 50 years as established by oral testimonies of members of the community and members of neighbouring communities. The communities may put their land to several uses, including agriculture, under the self-elected Community Land Management Development Committees. Community members collaborating, regardless of gender, are the highest decision-makers in customary communities. They elect their leadership, Community Land Management and Development Committees, which include equal representation from all community segments, including youth, men, and women. The Land Rights Act identifies and legitimizes protection, which may include mangroves as a land use category without making specific reference to mangroves or their protection. However, Liberia's National Wildlife and Protected Area Management Law protect mangroves and other marine species. Section 6.12(a) of the NWL mandates special protection of mangrove species to ensure their viable population.

The legal framework governing the Liberian environment has significant provisions within the various statutes for creating protected areas. Protected areas may therefore be established with terrestrial and marine environments of Liberia within any of the four categories of land which recognizes that land ownership is not exclusive but subject to reasonable regulations. Within customary land categories, the Regulations to the Land Rights Act provide that the direction for land use planning and land conversion is the prerogative of the customary community through its Community Land Management and Development Committee.

Environmental and Social Baseline Conditions

Liberia is home to the largest portion of Upper Guinea rainforests. Forests are estimated to make up two thirds of the country's land area and cover 6.69 million ha. Liberia's forests provide countless ecosystem services and are a biodiversity hotspot, home to some of the few long-term viable populations of several endemic species. Forests also serve as vital carbon sinks by absorbing and storing CO₂ through photosynthesis. As trees grow, they sequester carbon in their biomass while also transferring some carbon to the soil. Its mature forests could potentially allow Liberia to be a net sink, sequestering more carbon than it emits. The annual rate of removal of forest cover in Liberia rose between 2001 and 2014. Deforestation has been driven primarily by logging (often illegal), high demand for charcoal, and widespread use of firewood for heating and cooking. Farming, road development, urbanization, and mining are other important drivers of forest loss. The environmental and social baseline focuses on the general environmental and social issues of relevance to the project captured in Chapter 4.

Positive Impact

The project is expected to enhance governance, productivity, and climate resilience, while reducing the drivers of deforestation and degradation and will support Liberia's forest sector in Private Capital Enabling for private sector investments in forestry.



Potential Adverse Environmental and Social Risks and Impacts

The Project is being prepared under the Environmental and Social Framework. The relevant environmental and social standards include ESS1, ESS2, ESS3, ESS4, ESS5, ESS6, ESS8 and ESS10. The environmental and social risks for the Project are rated as **High**.

The project encompasses a diverse and interrelated range of environmental, social, and occupational health and safety risks across its components and sub-components. On the environmental perspective, the most significant risks arise from large-scale land-based activities under Component 2 and 3, including plantation establishment, community woodlot development, forest restoration, and Reduced Impact Logging within CFMAs, which carry risks of habitat disturbance and fragmentation, soil erosion, sedimentation of river and lake ecosystems, invasive species introduction, overexploitation of timber and NTFP species, and degradation of ecological corridors connecting Gola Forest National Park and surrounding forest areas. Infrastructure development activities including road and patrol track rehabilitation at GFNP and LPMR, construction of staff offices and housing, and pre-feasibility studies for PPP design-build-operate-transfer (DBOT) sawmills under Component 3 introduce additional risks of habitat disturbance, pollution, and access-induced encroachment. Sawmilling, timber processing, associated with livelihood and enterprise support activities generate further risks of air, water, and soil pollution. On the social risks and impacts, the project's most significant risks stem from unresolved land tenure disputes and boundary conflicts arising from CFMA formalization and demarcation, economic displacement of communities through restricted access to forest resources in and around protected areas before alternative livelihoods are established, elite capture of matching grants and enterprise finance, systematic exclusion of women and vulnerable groups from governance and benefit-sharing arrangements, and escalating intra- and inter-community tensions driven by market integration and commercial forestry expansion in communities with weak governance institutions. The combined effects of workforce influx, community-level cash transfers, and the geographic remote nature of project areas across six counties (Gbarpolu, and Grand Cape Mount, in the Northwest cluster, and Rivercess, Grand Bassa, Grand Gedeh, and Sinoe in the Central North and Southwest clusters) elevate the risk of gender-based violence and sexual exploitation and harassment throughout the project landscape. From an OHS perspective, the highest risks are associated with forest harvesting operations where workers are at risk of potentially fatal risks from falling trees, chainsaw accidents, and log extraction machinery and in sawmilling and timber processing activities that expose workers to machinery hazards, wood dust, noise-induced hearing loss, and vibration injuries. Additional OHS risks arise from boundary demarcation activities in remote forest environments, construction activities at GFNP, LPMR, and FTI facilities, and community livelihood activities involving snail farming, beekeeping, and manual NTFP harvesting all conducted in contexts with limited access to emergency medical care and occupational health services.

The Project's SEA/SH risk is rated **Substantial** due to the presence of civil works, labor influx and worker-community interactions, engagement of enforcement/security personnel, and livelihoods and value-chain activities that may alter local power dynamics. These risks are amplified by Liberia's high prevalence of gender-based violence against women and children and limited government capacity for prevention, monitoring, and survivor-centered response, especially in rural and forested areas. The Project will develop an SEA/SH action plan and accountability framework by appraisal and will finalize it within three months following project effective date.

Cumulative Environmental and Social Impacts- The project's High-risk rating is driven by the cumulative environmental and social risks arising from the simultaneous implementation of multiple interventions across ecologically sensitive and socially complex landscapes spanning six counties under SOP1. On the environmental perspective, the concurrent execution of plantation establishment, community woodlot



development, Reduced Impact Logging, NTFP commercialization, possible PPP-type opportunities in sawmilling and infrastructure development risks progressive forest cover loss and fragmentation, depletion of timber and NTFP species beyond sustainable yield thresholds, soil erosion and sedimentation of river and lake ecosystems, and incremental and potentially irreversible biodiversity loss. On the social perspective, the concurrent processes of CFMA formalization, land-use planning, boundary demarcation, enforcement strengthening, and market integration across communities with unresolved land tenure disputes and weak governance structures elevate risks of land conflict, exclusion of women and vulnerable groups, deepening inequality, erosion of community trust, and a cumulative increase in gender-based violence compounded by workforce influx, community-level cash transfers, and the geographic remote nature of project areas. These cumulative risks necessitate a coordinated, landscape-level approach to environmental and social monitoring and adaptive management throughout project implementation.

Mitigation Measures

The Project will apply the mitigation hierarchy—avoid, minimize, mitigate, and compensate—to manage environmental and social risks during design, construction, and operation. The project will develop and disclose a Stakeholders Engagement Plan (SEP), Environmental and Social Commitment Plan (ESCP), Environmental and Social Management Framework (ESMF), Resettlement Framework (RF), Labor Management Procedures (LMP) and Process Framework (PF) by Project appraisal. The Project will have a responsive grievance mechanism to address Project specific complaints, including labor and SEA/SH related complaints.

The project's environmental mitigation framework integrates environmental screening, baseline assessment, and participatory land-use planning across all land-based activities to identify and exclude ecologically sensitive areas including high conservation value forests, riparian buffers, and biodiversity corridors from plantation establishment, woodlot development, and infrastructure siting. Construction Environmental and Social Management Plans will be required for all civil work, with controls on vegetation clearance, sediment management, materials sourcing, and waste disposal. RIL operations will be governed by pre-harvest inventories, felling standards, equipment around watercourses, and post-harvest monitoring of canopy recovery and soil condition. Sustainable harvest and annual NTFP stock monitoring will be enforced to prevent overexploitation, while pollution control measures including dust extraction, effluent management, and wood waste valorization plans will be required for all processing operations. Landscape connectivity will be maintained through riparian buffer standards, ecological reserve areas within plantation zones, and native species planting designs that reduce fragmentation and support ecological movement across the project landscape. The social mitigation framework centers on the application of FPIC-aligned community engagement principles throughout CFMA formalization, boundary demarcation, and protected area management processes, supported by independent facilitators, conflict resolution mechanisms, and legal support for communities engaged in contract negotiations with private sector operators. Transparent, criteria-based subproject and grant selection processes with mandatory inclusion targets for women-led enterprises and vulnerable households, and independent beneficiary verification will reduce elite capture and exclusion risks. A Process Framework will govern the sequencing of resource access restrictions relative to the delivery of alternative livelihoods, ensuring communities are not economically displaced before mitigation measures are in place. GBV risks will be addressed through Worker Codes of Conduct, GBV-specific training for project workers and community members, accessible and confidential reporting mechanisms, and coordinated referral pathways to survivor support services. Grievance mechanisms designed for accessibility across literacy levels, languages, and geographic distances will be operationalized before project activities commence and maintained throughout implementation. OHS mitigation measures will be designed to



the specific risk profile of each activity, with RIL and processing operations subject to comprehensive OHS management plans, mandatory certified operator competency requirements, and strict PPE enforcement. Emergency communication equipment trained first aiders and documented medical evacuation procedures will be maintained at all remote work sites, while OHS guidelines will be integrated into community subproject implementation support to ensure that livelihood beneficiaries are equipped to manage occupational health risks associated with their supported activities.

In addition other overarching mitigation measures include (i) participatory land use planning and conflict mapping exercise, including structured stakeholder consultations with all user groups for CFMA demarcation activities in accordance with the project's Stakeholder Engagement Plan (SEP), (ii) Community Forest Management Plans must be prepared in compliance with the sustainable forest management principles of ESS6, (iii) A biodiversity screening checklist must be applied to all restoration sites prior to establishment, to identify the presence of high-value habitats, protected species, and ecologically sensitive areas. (iv) Labor influx risks must be managed through a Labor Management Procedure (LMP) that includes SEA/SH prevention codes of conduct, community grievance mechanisms, and health risk management (including HIV/AIDS awareness). (v) Livelihood monitoring surveys must track whether income alternatives for displaced farmers are functioning as planned (vi) Site-specific Environmental and Social Impact Assessments (ESIAs) must be prepared for all protected area infrastructure investments prior to the commencement of civil works, with particular emphasis on biodiversity surveys identifying the presence of endangered species and critical habitats which will be addressed with the preparation of a Biodiversity Management Plan (BMP) consistent with ESS6 requirements. (vii) Workers must be subject to strict codes of conduct prohibiting hunting, collection of wildlife products, and unauthorized entry into forest areas, with zero-tolerance enforcement and contractual sanctions. (viii) Implement the Process Framework in accordance with ESS5 to address any restriction of community access to protected area resources, establishing participatory processes for determining and implementing livelihood alternatives for affected households (ix) nature-based tourism including ecotourism PPP investment at GFNP and LPMR siting must avoid critical habitats, with site selection guided by a biodiversity impact assessment. (xi) Sustainable sanitation and waste management systems must be designed into infrastructure from the outset (xii) Site-specific ESIAs/ESMPs must be prepared and disclosed prior to the commencement of any investment-ready activities from pre-feasibility and feasibility studies under the PPP projects, design-build-operate-transfer (DBOT) model.

Given that Component 1 supports the formulation, regulatory reform, and implementation of policies, strategies, and programs with potential environmental and social consequences, the Project will be required to conduct a Strategic Environmental and Social Assessment (SESA) to evaluate these impacts at a strategic level within (12) months of Project effectiveness date to examine the environmental and social implications of each proposed policy and legislative reform supported by the project and integrate environmental and social considerations into upstream policy and strategy decision-making processes. The SESA report will be consulted upon and should be publicly disclosed in country and the World Bank external website.

Where applicable, for civil works activities, subproject-specific instruments such as Environmental and Social Impact Assessments (ESIAs), and site specific Environmental and Social Management Plans (ESMPs), Biodiversity Management Plan (BMPs), and Resettlement Plans (RPs) will be prepared by the FDA Project Implementation Unit (PIU) for approval by the Bank. Subsequently, the FDA/PIU will be required to disclose, implement and report on implementation progress of the approved ESIAs/ESMPs/BMPs/RPs. The FDA/PIU will ensure that the Codes of Conducts and Environmental and Social Clauses are inserted into contract documents and reporting mechanisms. Contractors will be



required to adopt Contractor ESMPs (C-ESMPs) with Codes of Conduct and SEA/SH-sensitive supervision. For TA and feasibility studies, Terms of Reference will be prepared by the FDA/PIU and should include ESF clauses to screen for downstream environmental and social implications.

Institutional Arrangements for ESMF Implementation

FDA will serve as the lead implementing agency. The FDA/PIU will establish and maintain a project implementation unit [PIU], and hire/appoint an Environmental Specialist, a Social Specialist and a gender and GBV Specialist. The Environment Protection Agency (EPA) requires the FDA/PIU to obtain an environmental impact assessment (EIA) permit before undertaking activities that may have an adverse impact on the environment and prior to the commencement of civil works in accordance with the Liberia EPA Act 2003 and the Environmental Protection and Management Law (EPML, 2003).

Capacity Building and Training for ESMF

Training programs to build capacity for the implementation of mitigation and management measures outlined in the ESMF and the cost associated with capacity building programs have been included in the ESMF implementation budget estimated at One hundred and fifteen thousand United States Dollars (**US\$ 115,000**). These include training programs in World Bank Environmental and Social Standards (ESSs), Implementation of Process Framework (PF) and its associated recommendations, Implementation of Stakeholder Engagement Plan (SEP), Implementation of the Environmental and Social Management Framework (ESMF), Implementation of Labor Management Procedures (LMP), Implementation of Grievance Mechanisms (GM), Occupational Health and Safety (OHS) protocols, including Environment and Social Incident reporting procedures (ESIRT) under for the project, Community health and safety, Emergency preparedness and response procedures, Specific aspects of environmental and social assessment including Environmental and Social risks management practices identified by project actors during project implementation, Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) Action Plan and accountability framework, Resettlement Framework (RF) as outlined in the ESCP. The details are summarized in Table 16 of the ESMF.

Estimated Budget

An estimated total amount of two million seven hundred seventy-seven thousand two hundred fifty United States Dollars (**US\$ 2,777,250**) will be required to implement activities identified in the ESMF throughout the project, however, exact details on the budget will be included in the prepared ESIAs/ESMPs, RPs and relevant ES instruments. These estimates only serve as a potential guideline for the preparation of site-specific ESIAs/ESMPs/BMP etc which will have cost expenditures required to implement the ESMP. The details are summarized in Table 17 of the ESMF. These figures are indicative and the FDA/PIU of the LiFE-P will prepare subsequent funds as more clarity is obtained on project activities.



1. Introduction

1.1 Background Information

The LiFE project includes an IDA grant of US\$40 million and a proposed PROGREEN grant US\$ 5.4 million to address critical challenges facing Liberia's forests and to unlock their economic, social, and environmental potential. Under Component 1 will strengthen the enabling environment for sustainable, accountable and transparent forest management. Component 2 will create a pipeline of market-ready community forest enterprises by combining legal tenure and capable governance bodies (2.1), a productive and sustainably certified resource base (2.2), and stronger conservation and ecotourism assets (2.3). Component 3 focuses on commercializing Liberia's timber products and NTFPs by promoting sustainable production, transparent management, and competitiveness to unlock the forest sector's potential to create more and better jobs. Through technical assistance, results-based support, and investment facilitation, the Project is expected to improve the competitiveness of SMEs, expand domestic value addition, and mobilize private capital in the forestry sector.

Together, the interventions are expected to lead to improved forest management and restoration outcomes, increased economic opportunities and jobs (including for women and youth), strengthened value chains for timber and NTFPs, reduced illegal and unsustainable practices, and enhanced compliance with regulatory and certification standards. These outcomes will contribute to the achievement of the PDO by increasing the area under enhanced conservation, restoration, and sustainable management, reducing net greenhouse gas emissions, increasing the value of sustainably produced timber and NTFPs by Project-supported enterprises, creating new or better jobs, and mobilizing private investment in the forestry sector.

1.2 Aim and Objectives of the Environmental and Social Management Framework (ESMF)

This ESMF, with LMP annexes, provides guidance for project agencies on E&S screening, risk assessment, and management throughout project design and implementation. It covers the creation of ESMPs and labor requirements in line with the World Bank ESF.

The ESMF is intended to be used as a practical tool during project formulation, design, implementation, and monitoring of the project. For ensuring good environmental management in the proposed LiFE-P, the ESMF will provide guidance on pre-investment works/studies (such as environmental and social screening, environmental and social assessment, environmental and social management plans, etc.), provide a set of steps, process, procedure, and mechanism for ensuring adequate level of environmental and social consideration and integration in each investment in the project-cycle; and describes the principles, objectives and approach to be followed to avoid or minimize or mitigate impacts. More specifically, the ESMF aims to

1. Assess the potential environmental and social risks and impacts of the proposed Project and propose mitigation measures.
2. Establish procedures for the environmental and social screening, review, approval, and implementation of activities.
3. Specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities.
4. Identify the staffing requirements, as well as the training and capacity building needed to successfully implement the provisions of the ESMF.



5. address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and
6. Establish the budget requirements for implementation of ESMF.

This ESMF should be read together with other plans prepared for the project, including the Labor Management Procedures (LMP). This will include a gender-based violence, SEA/SH action Plan and accountability framework. The Stakeholder Engagement Plan (SEP) will identify and involve key stakeholders, ensuring inclusive consultations. The ESMF, RF, PF and SEP will include a grievance mechanism (GM) to address complaints and foster inclusive decision-making. The Environmental and Social Commitment Plan (ESCP) will outline necessary actions to meet environmental and social standards, including the implementation of the ESMF, RF, LMP, PF and SEP.

1.5 Study Approach and Methodology

This ESMF follows the World Bank Environmental and Social Framework (ESF) as well as the national laws and local laws and regulations of Liberia. The following approach and techniques were used in the preparing the ESMF:

- Review of the project details and data gathering through desktop study.
- Review of the policy and regulatory requirements
- Reconnaissance field visit and initial scoping and screening to determine the key environmental and social parameters and aspects that are likely to be impacted by the project activities.
- Stakeholder consultations with the relevant sector institutions including national government & regulatory Institutions and sub-national level/potential target counties.
- Review and incorporation of comments and feedback from stakeholders into ESMF; and
- Approval of the ESMF with annexes on LMP for disclosure.



2. Project Description

2.1 Project Overview

In West Africa, Liberia remains the country with the most forests, occupying between 42 percent of the Upper Guinean Forest that stretches from Guinea to Cameroon.² Liberia's 6.69 million ha of forests comprise evergreen forests in the Southeast around the border with Ivory Coast and deciduous forests in the Northwest bordering Sierra Leone and Guinea. These forests cover about 69 percent of the land mass of Liberia.³ Liberia's forests are home to over 2,200 flora species of vascular plants (including 225 tree species), of which 4.7% are endemic; and 881 known fauna species (including 600 bird species, 150 mammal species, and 75 reptile species), of which 0.8% are endemic and 4.2% threatened. Liberia's forests also produce a wide range of other environmental goods and services which are part of its economy.

Forest cover in Liberia has been declining over the last few decades, including both deforestation and forest degradation. As of 2020, 92% of forest cover in Liberia was natural forests, and according to FAO the rate of deforestation in Liberia was 30.3 kha per year between 2015 and 2020. Primary dense forest in Liberia has declined in extent and condition, with increasing levels of fragmentation. From 2015 to 2024, Liberia lost 343.3 kha of humid primary forest, making up 5.7% loss of this type of forest⁴. Also, during that period Liberia lost 1.76 million hectares of tree cover⁵, equivalent to a 27% decrease in tree cover since 2000, resulting in 1.48 Gt of CO₂e emissions.

2.2 Rationale for the project

In response, under the Environmental Sustainability pillar of the ARREST Agenda for Inclusive Development 2025-2029⁶, the Government of Liberia (GoL) is focused on generating more income, and revenues for the country by restoring degraded ecosystems, addressing deforestation and forest degradation, and promoting sustainable land use practices to improve forest assets. However, structural weaknesses in forest governance, limited value addition, weak enforcement, and declining forest capital have constrained the sector's ability to contribute meaningfully to job creation, fiscal revenues, and inclusive growth. Addressing these constraints is essential to transform Liberia's forests from a subsistence safety net into a driver of sustainable economic development.

2.3 Project Development Objective

The Project Development Objective (PDO) of the Series of Projects (SOP) is to *improve forest governance, expand community-managed forests, and increase income and jobs for forest-dependent people in selected areas of Liberia.*" . The SOP will retain the same PDO across all ensuing projects and will follow a consistent approach in terms of project design, ensuring maximum synergy and cross-learning through the different phases.

² Broderick, C. E., & Appleton, N. S. (2018). A case study for Liberian agroforestry: science and the implementation of a co-management prospectus for agriculture and forestry. *Forestry Research and Engineering: International Journal*, 214–224.

³ Liberia National Forest Inventory 2018/2019. Liberia established a definition of forest, which was developed and validated by the FDA as an area of land that has a canopy cover of minimum 30%; contains trees with a minimum of 5 m height or the capacity to reach it; covers a minimum of 1 hectare of land. This includes shifting cultivation in its fallow phase (as far as the threshold values are met), and does not include land with predominant agricultural use (including tree crops such as oil palm and rubber).

⁴ Global Forest Watch. <https://www.globalforestwatch.org/dashboards/country/LBR/?category=forest-change>

⁵ Tree cover is defined as all vegetation taller than 5 m. in height as of 2000. "Loss" indicates the removal or mortality of tree cover and can be due to a variety of factors, including mechanical harvesting, fire, disease, etc. As such, "loss" does not equate to deforestation.

⁶ <https://liberia.un.org/en/287777-arrest-agenda-inclusive-development-2025-2029>



2.4 Project Components

SOP1 includes an IDA grant of US\$40 million and a Global Partnership for Sustainable and Resilient Landscapes (PROGREEN) grant of US\$5.4 million to address critical challenges in Liberia's forests and unlock their economic potential while managing the forest and its biodiversity. The project will support PCM and PCE conditions for forestry investment by reducing legal and property-related barriers. It also contributes to the World Bank's priority on job creation by investing in the natural infrastructure that underpins economic activity and by fostering conditions for private investment. Together, these efforts can expand employment across the forest sector and into agribusiness, linking forest stewardship to broader economic opportunity. Aligned with PROGREEN Multi-Donor Trust Fund objectives to improve ecosystem services in resilient production and conservation landscapes while supporting rural livelihoods and addressing biodiversity loss and forest degradation, the project reflects PROGREEN's evolving framework, which sees forests as both conservation assets and engines of sustainable growth.

Component 1: Strengthen the enabling environment for Sustainable, Transparent, and Commercially viable forest management

Component 1 will strengthen the enabling environment for sustainable, accountable, and transparent forest management.⁷ It will deliver a data-driven forest governance system by strengthening legal enforcement; improving monitoring, licensing, and traceability systems; enhancing cross-agency coordination; and supporting the harmonization of the legal and regulatory framework.⁸ It will also build the FDA's institutional capacity by strengthening governance, human resources (HR), and internal systems, while introducing a structured pathway to fiscal sustainability as well as measures to safeguard project assets.

Subcomponent 1.1: Improved Forest Governance and Transparency

This subcomponent will strengthen forest governance by improving coordination, enforcement, transparency, and the legal and regulatory framework for commercial forestry and community rights. It will support: (a) a Forest Economy Task Force, co-chaired by MFDP and FDA, to provide oversight and high-level coordination⁹; (b) stronger risk-based enforcement through the Wildlife Crime Task Force, including updated SOPs, a national risk-targeting model, joint training, field equipment, and quarterly enforcement reports; (c) upgrades to FDA's public dashboard to disclose active concessions, license holders, and related payments in open-data format; and (d) priority policy, legal, and regulatory harmonization through analysis, consultations, draft amendments, and explanatory memoranda to reduce ambiguity, align laws with national objectives, and separate FDA's regulatory, forest management, and commercial functions.

⁷ The design of the component has been informed by the Fostering Accountability and Collaborative Engagements for Integrity and Transformation ASA (P506674), which analyzed political economy issues in the sector and proposed recommendations.

⁸ These include the 2006 National Forestry Reform Law, the 2009 Community Rights Law, and the Land Rights Act to secure local communities' rights regarding forest and land governance.

⁹ The Task Force will operate under clear terms of reference, workplans, governance arrangements, MOUs, and data-sharing agreements. Its mandate will include oversight of high-value concession awards and licenses—especially where FDA commercial interests may overlap with its regulatory role—and public reporting above a set financial threshold to provide a check on FDA's dual mandate.



Subcomponent 1.2: Strengthened Institutional Capacity and Performance

The objective of this subcomponent is to enhance the FDA's institutional capability to regulate forests transparently, efficiently, and accountably. It will strengthen FDA governance, staffing, inventory, and monitoring; provide equipment to secure project assets; digitize regulatory processes and chain-of-custody management, including LiberTrace handover; improve fiscal sustainability; and implement regulatory amendments separating FDA's regulatory, commercial, and forest management functions. It will support the following:

- (a) The adoption and operationalization of an FDA code of corporate governance¹⁰ accompanied by training.
- (b) Alignment of the HR framework developed with the Civil Service Agency with FDA-specific core competencies, including competency-aligned recruitment policies, an incentive-based performance management system with periodic reporting, and a targeted, competency-based training program linked to core FDA functions; HR improvements will further ensure that staff whose functions currently straddle regulatory and commercial domains are explicitly assigned to one or the other for institutional separation.¹¹
- (c) LiberTrace enhancements and automation of key processes across commercial functions (licensing, permits, and verification), operationalization of forest and biodiversity inventories, and development of standard operating procedures alongside strengthened internal controls;
- (d) Deployment of information technology (IT) equipment and infrastructure, aiming to establish the forest and biodiversity monitoring system¹² including GIS¹³ and other technologies, solar power and generators, and operational equipment at FDA headquarters and regional offices under formal asset governance and service management frameworks, ensuring system availability, reliable connectivity, interoperability, and secure data exchange with core government systems.
- (e) Comprehensive physical and digital asset management and security protocols covering inventory controls, cybersecurity standards, access controls, audit log requirements, data integrity safeguards, and incident response procedures.
- (f) Development of a fiscal sustainability road map for the FDA that establishes current operational cost and own-source revenue baselines, quantifies the financing gap, and sets a phased revenue growth trajectory with time-bound milestones for increasing the share of operational costs covered by FDA own-source revenues.¹⁴

¹⁰ The corporate governance code will require conflict-of-interest disclosures, mandatory recusal for personal, family, or financial interests, and independent review of high-value concession awards, with findings published on the FDA portal. The GRM and whistleblower policy will operate independently of FDA management, with relevant complaints reviewed by the Task Force for the Forest Economy. The risk register will rate elite capture as a risk and define escalation triggers, including complaint thresholds for independent review.

¹¹ Individual and departmental key performance indicators will include metrics related to revenue collection efficiency and compliance with fee and royalty payment schedules, linking institutional performance to fiscal sustainability outcomes.

¹² The forest and biodiversity monitoring system could also support climate-change monitoring and future climate finance initiatives. Inventories conducted under this activity will assess timber stocks and forest resources, while generating evidence-based data on forest and biodiversity conditions (biodiversity assessment), including, where feasible, information on species presence, abundance, and movement patterns.

¹³ The GIS will be introduced within the Research and Development Center of the FDA to strengthen forest and land-use monitoring and analytical capacity by establishing a shared, FDA-wide platform.

¹⁴ The road map will distinguish sustainable own-source revenues from regulatory fees and levies from higher-risk revenues tied to FDA's direct commercial forest management. It will set a path to reduce the latter's share of FDA revenues and strengthen fiscal sustainability through the regulatory fee base.



Component 2: Sustainable Forest Resource Development and Resilient Livelihoods

Component 2 will create a pipeline of market-ready community forest enterprises by combining legal tenure and capable governance bodies (2.1), a productive and sustainably certified resource base (2.2), and stronger conservation and ecotourism assets (2.3). The community enterprises, CFMA clusters, and forest management plans developed under this component constitute the supply base of legal timber, certified NTFPs, and nature-based tourism assets that Component 3's private sector engagement instruments, off-take facilitation, SME support, and matching grants (Window 2) are designed to connect to commercial buyers and investment partners. To ensure long-term viability, community forest enterprises, restoration activities, and protected area interventions will apply sustainability principles to help CFMAs and protected areas maintain productivity and ecological integrity beyond the project period. Financial sustainability will be strengthened through progression between a two window matching grants system reducing reliance on project funding and supporting self-sustaining, market-integrated forest enterprises.

Communities hold legal rights over large CFMAs but often lack the capacity, capital, and market links to manage them sustainably and profitably. Without viable forest-based livelihoods, they may convert forests to agriculture or rely on informal extraction, driving degradation and weakening governance. Component 2 addresses this supply-side gap by developing legally recognized, sustainably managed community forest enterprises whose timber and NTFP outputs can meet Component 3 market and investment requirements. Its key innovation, the CFMA Cluster Approach, groups two or more CFMAs under shared governance and investment structures to create the scale, credibility, and bankability needed to attract buyers, finance, investment, and private partners.

Subcomponent 2.1: Community-based Management and Use of Natural Resources

This subcomponent will support formal recognition of 10 new CFMAs through the nine-step¹⁵ process under the Community Rights Law and strengthen 10 existing CFMAs, prioritizing those supported under the closed LFSP. It will build CFMB capacity through governance and biodiversity management training and support participatory CFMPs with business and sustainability strategies for timber, NTFPs, and viable agricultural commodities. The FDA, with qualified partners as needed, will lead community engagement and forest extension services. Support will cover participatory planning, land zoning, natural resource and business planning, contract renegotiation, engagement with private operators, and small infrastructure. Approved CFMPs will guide all forest uses, including reduced-impact logging in approved production zones consistent with FDA harvesting practices, while conservation agreements will protect biodiversity-rich and high-conservation value areas. The project will support at least 30 percent female representation in CFMBs and promote women's meaningful participation as essential to effective governance.

¹⁵ Provides the legal and institutional foundation through which communities gain formal rights over their customary forest lands. The nine-step process spans (a) community application for Authorized Forest Community status; (b) notice for socioeconomic survey and resource reconnaissance; (c) conduct of the socioeconomic survey and resource reconnaissance; (d) notice of demarcation and mapping; (e) FDA demarcation and mapping of the area; (f) posting of results for a 30-day public review period; (g) resolution of third-party objections; (h) establishment of community governance structures including the Community Assembly, Executive Committee, and CFMB; and (i) signing of the CFMA between the CFMB and the FDA, granting the community legal rights over its customary forest lands.



CFMA cluster approach. The CFMA clustering¹⁶ is a cooperative arrangement through which two or more legally recognized CFMAs form a joint administrative scheme and a shared business plan to collectively manage forests, access finance, and engage markets as a single business interface. Clusters are defined based on geographic proximity, forest type, tenure status, and market prospects. By pooling resources and governance across CFMAs, the cluster creates the economies of scale and institutional credibility necessary to lower transaction costs, enter formal markets, and become investment ready. CFMA clusters are the primary counterpart through which off-take facilitation, SME support, and matching grant mechanisms of Component 3 will engage with the community forestry sector. Their development is a prerequisite for Component 3.

To support the growth of community enterprises from start-up activities to market-integrated operations, the subcomponent implements Window 1 to support nature-based matching grant mechanism,¹⁷ drawing from PROGREEN funds. Window 1 is targeted at early-stage community and household-level enterprises in CFMA areas and protected area buffer zones.¹⁸ It finances sustainable and climate-resilient alternative livelihoods—particularly NTFP-based activities such as bamboo, rattan, bitter kola, honey, snails, and locusts¹⁹, and small-scale investments in post-harvest and aggregation infrastructure, including storage, drying, and packaging equipment utilizing renewable energy, with beneficiary co-financing contributions required. Window 1 is explicitly designed as a catalytic, time-limited entry point: It supports enterprises at the stage when commercial viability has not yet been demonstrated, and access to formal finance is unavailable. Enterprises that graduate from Window 1, demonstrating production capacity and identified market linkages, become eligible for the larger IDA-financed grants under Window 2 in Component 3, which finances equipment and small-scale processing infrastructure for more mature CFMA-based MSMEs.

Subcomponent 2.2: Forest Restoration, and Timber Production

This subcomponent focuses on land-use planning for the six counties, restoring degraded landscapes, planting more trees, and increasing sustainable timber production within and around CFMA landscapes. Investments will include practical production systems for timber, fuelwood, rubber, and other tree-based products, aligned with the intended purpose of the plantations, while generating income and maintaining ecological functions. Restoration and sustainable forest management also contribute directly to the project's GHG emissions reduction targets, sequestering carbon and reducing emissions from deforestation and degradation. Activities under this subcomponent are therefore central not only to the livelihood's objective but to the project's climate outcomes. Community members will be trained in forest and biodiversity monitoring to feed data into the national monitoring system supported under Component 1, ensuring that results can be tracked and attributed.

¹⁶ International experience from Mexico, Guatemala, and Nepal demonstrates that clustering community forestry groups into larger collective structures significantly enhances their economic and institutional performance. Whether through regional unions (Mexico), concession associations (Guatemala), or national federations (Nepal), aggregation enables communities to access better markets, share technical and legal expertise, coordinate landscape-level management, and strengthen their policy voice, outcomes that individual groups could not achieve alone. These models offer a strong evidence base for designing a project that supports the formation or strengthening of community forestry clusters as a pathway to sustainability and profitability. .

¹⁷ Matching grants will follow World Bank transparency standards built on clear upfront rules, independent competitive selection, strong financial and physical oversight, and proactive communication and complaint handling. Awards will be based on published eligibility criteria and independent scoring against technical, financial, environmental, and social benchmarks, with public disclosure of decisions, GRM access for unsuccessful applicants, and priority for proposals that create local jobs and expand women's and youth economic participation.

¹⁸ This window will explore synergies and will avoid duplication with the activities on community livelihood and agriculture support financed by the Recovery of Economic Activity for Liberian Informal Sector Employment (REALISE), P174417 project in Grand Gedeh, Gbarpolu, Grand Cape Mount, and Sinoe.

¹⁹ These value chains have been identified through a study (From Invisible to Investable: Uncovering Liberia's Forestry Value Chains Potential) commissioned during project preparation financed by the Global Program on Sustainability (TF0C9271).



Participatory land-use plans will identify and allocate areas for forest biodiversity conservation, restoration, plantations and agricultural production—including cocoa, rubber, and oil palm—in response to community priorities identified under Subcomponent 2.1. Capacity building on land restoration practices²⁰ will train staff to promote women’s participation, adapt training materials, and deliver practical community-level sessions followed by hands-on field coaching. Restoration activities will rehabilitate 6,000 ha of degraded lands using context-specific approaches, with a focus on priority areas, including Gbarpolu and Grand Cape Mount counties and areas around the transboundary GFNP. The project will support approximately 13,116 ha of commercial plantations through community woodlots and rehabilitation of old-growth plantations. Sustainable timber production will also be promoted through the valorization of abandoned logs and aged rubberwood.

Subcomponent 2.3: Improved Management of High Value Transboundary Protected Areas

The protected areas supported under this subcomponent—GFNP and Lake Piso Multiple Sustainable Use Reserve—are not isolated from the CFMA landscape activities in Subcomponents 2.1 and 2.2. They form the conservation anchors of the same landscape mosaic within which community forest management is being developed. Strengthening their management, therefore, directly reinforces the outcomes of the broader component: well-managed protected areas sustain the ecosystem services such as water regulation, biodiversity, and soil quality, that underpin the productivity of surrounding CFMA lands. Conversely, the community enterprises and buffer zone livelihoods developed under Subcomponents 2.1 and 2.2 reduce encroachment pressure on the parks, creating a mutually reinforcing dynamic between conservation and community development.

This subcomponent will strengthen management of GFNP and Lake Piso Reserve to enhance ecological integrity, transboundary impact, and long-term economic value. Key activities include preparing a participatory Lake Piso management plan and updating the GFNP management plan²¹; providing vehicles, GPS, and radio equipment for biodiversity and animal monitoring; preparing an ecotourism strategy with revenue-sharing mechanisms; constructing priority park infrastructure, including offices and housing; rehabilitating patrol tracks and roads; and demarcating protected area boundaries. Stronger management is expected to deliver climate mitigation benefits by avoiding deforestation and forest degradation. The project will also support transboundary biodiversity connectivity assessments across Wonegizi/Ziama, Diecke, Nimba, and Sapo/Grebo/Tai, building on bilateral MOUs to inform conservation cooperation. **Specifically, this subcomponent will strengthen the management of GFNP and Lake Piso Multiple Sustainable Use Reserve to enhance their ecological integrity, transboundary impact, and long-term economic value.** Key activities include (a) development of a participatory management plan for Lake Piso Reserve and update of the GFNP management plan; provision of equipment, including vehicles, global positioning system (GPS), and radio equipment, for biodiversity and animal population monitoring; and preparation of an ecotourism strategy with revenue-sharing mechanisms for both protected areas (b) construction of priority park infrastructure, including staff offices and housing, rehabilitation and maintenance of patrol tracks and roads, and demarcation of protected area boundaries. By strengthening management effectiveness, the subcomponent is also expected to generate significant climate mitigation benefits through avoided deforestation and forest

²⁰ This will also include training of trainers for selected FDA technical staff (under Subcomponent 3.2).

²¹ The updated GFNP management plan will explicitly incorporate cross-border conservation considerations, building on existing transboundary collaboration with the Gola Rainforest National Park in Sierra Leone. Coordination mechanisms with Sierra Leonean conservation authorities will be explored and, where feasible, formalized, to support harmonized antipoaching efforts, shared biodiversity monitoring protocols, and joint promotion of the transboundary Gola landscape as a tourism and conservation destination under the Northwest Circuit concept.



degradation, and (c) the project will additionally support transboundary biodiversity connectivity assessments across the Wonegizi/Ziama (Liberia-Guinea), Diecke (Guinea), Nimba (Guinea-Liberia-Côte d'Ivoire), and Sapo/Grebo/Taï (Liberia-Côte d'Ivoire), building on existing bilateral MOUs to strengthen the evidentiary basis for transboundary conservation cooperation.

The ecotourism activities under this subcomponent are preparatory, designed to de-risk and lay the groundwork for larger ecotourism investments under SOP2. Ecotourism is conceived as a non-extractive livelihood stream for communities in and around the protected areas, complementing the NTFP and timber-based enterprises developed under Subcomponents 2.1 and 2.2, with revenue-sharing mechanisms ensuring income flows back to buffer zone communities. The PPP framework to be piloted is aligned with the private investment facilitation work of Component 3.

Specifically, SOP1 will deliver (a) tourism market demand and feasibility assessments for the proposed Northwest Circuit linking Lake Piso, Blue Lake, and the Gola Forest landscape; (b) biodiversity-based and climate-resilient ecotourism development strategies for both protected areas; (c) a PPP transaction framework covering concession models, licensing arrangements, and revenue-sharing mechanisms between the FDA, communities, and private operators; (d) identification, prequalification, and preliminary engagement of potential private sector partners for SOP2 concessions; and (e) climate-resilient and biodiversity-friendly infrastructure specifications including ecolodge footprints, visitor interpretation centers, and trail network designs, to inform SOP2 design and costing, alongside the completion of required environmental and social assessments for planned tourism development sites.²²

Component 3: Creating Enabling Conditions for Private Investment in Commercial Forestry for More and Better Jobs

Component 3 focuses on commercializing Liberia's timber products and NTFPs by promoting sustainable production, transparent management, and competitiveness to unlock the forest sector's potential to create more and better jobs. It will (a) strengthen forestry MSMEs through technical assistance and finance; (b) improve skills and labor supply through targeted training; and (c) attract private investment in value addition by supporting infrastructure, policy reforms, and investment promotion. Building on regulatory reforms under Component 1 and coordination improvements under Component 2, these efforts will strengthen the business environment, increase domestic value addition, and expand private sector-led job creation in the forest sector. Firm-level support will be limited to businesses sourcing timber and NTFPs from legally and sustainably managed CFMAs under Sustainable Forest and Biodiversity Management principles, creating a direct incentive for sustainable sourcing and making climate-compatible forest use more commercially attractive.

Subcomponent 3.1: Support to Forestry Entrepreneurs: Capacity and Finance

The subcomponent aims to address critical market failures that constrain investment, value addition, and job creation in Liberia's timber and NTFP value chains. The project will support commercially viable MSMEs and larger enterprises, including women and youth-led businesses engaged in timber and rubberwood processing, wood products manufacturing, NTFP processing, aggregation, and marketing, including enterprises with sourcing arrangements and productive partnerships with forest communities through a Forestry Enterprise Readiness and De-risking Program and a performance-based financing facility through window 2 of the nature-based matching grant mechanism. The program is designed as a

²² Physical infrastructure construction and the award of private sector concession agreements will be advanced under SOP2, conditional on demonstrated market demand and viable transaction terms.



pathway to investment readiness for forestry enterprises. It addresses the investment readiness gap that prevents forestry enterprises from accessing commercial finance.

Technical assistance will strengthen enterprise capabilities and market linkages, while performance-based financing will co-finance investments constrained by limited finance and perceived risks.

Together, these measures will help firms formalize, expand, create better jobs, build commercial relationships with forest communities, buyers, and off-takers, and establish reliable revenues and cash flows. They are expected to reduce investment risks, improve bankability, and create a pipeline of investment-ready enterprises able to access commercial finance. Building on LIFT (P171997) and partner support, businesses will be selected based on viability, scalability, sustainability, and job-creation potential, with results-based financing and matching requirements to address incentive and bankability constraints. A private sector service provider will manage implementation under FDA and SBA oversight, following an operations manual with eligibility criteria. Support will require legal sourcing and climate-resilient forest management, including reduced-impact logging to preserve canopy cover, soil integrity, and watershed functions and reduce climate-related productivity losses.

The Forestry Enterprise Readiness and De-risking Program will be delivered in three phases:

- (a) A diagnostic phase to establish business baselines and identify gaps, including formalization needs.
- (b) A firm-improvement technical assistance phase to develop improvement plans and performance agreements and provide group and tailored support on business strategy, operations, harvesting, processing, storage, formalization, marketing, pricing, and access to finance, including constraints faced by women-led businesses. Training will also include soft skills training proven to increase profits for women-led businesses. Some practical training may use the Service Excellence Center (SEC) under Subcomponent 3.2.
- (c) A results-based financing phase for enterprises that meet performance milestones. This phase will finance capital investments, productivity-enhancing technologies and systems, greener operations, specialized technical assistance, and certification, with matching contributions from firms between 10 and 50 percent. Matching requirements will vary based on enterprise size and risk profile to ensure beneficiary commitment, leverage private resources, and maximize additionality.²³

Subcomponent 3.2: Skills Development for Forestry Jobs

To address skills gaps in value-added commercial forestry, the project will (a) upgrade the Forestry Training Institute to establish the SEC in partnership with the institute, community colleges, tertiary institutions, and the private sector; (b) establish a wood lab at the University of Liberia; and (c) support graduate placement in wage or self-employment. A private sector skills demand assessment will guide infrastructure upgrades by identifying workforce gaps, hiring needs, and wage levels, ensuring that curricula, equipment, and training cohorts match market demand. Given current sector conditions, near-term priorities are primary processing skills—such as sawmilling, kiln drying, grading, veneer, and forest management operations—before moving to higher-value secondary processing skills like furniture

²³ The PFMU will manage grant disbursements, while the service provider will evaluate subprojects, support implementation, and supervise performance. Funds will be released in tranches, with later payments tied to verified outputs, fiduciary compliance, and performance targets. Joint oversight by FDA, SBA, civil society, the private sector, and the PIU, along with World Bank no-objection and supervision, will ensure compliance with program, environmental and social, and fiduciary standards. The program will help turn fragmented informal activities into auditable, investment-ready value chains able to attract sustainable private finance.



and moldings. Eligible SEC investments include (a) facility rehabilitation and industry-standard equipment; (b) competency-based curricula with modules on climate-resilient silviculture and harvesting, flexible programs for women, and accreditation; (c) training of trainers with regional support and short-term technical assistance; and (d) structured South–South exchanges with priority regional institutions. Training will also include ecological silviculture techniques within Liberia's tropical rainforest context, including reduced impact logging and assisted natural regeneration. The SEC will serve as a national hub delivering decentralized short courses through partner colleges. To keep training demand-driven, the project will also seek private sector representation in SEC oversight, alongside the Forestry Training Institute.

To link training to jobs, the project will establish a graduate-to-employment pathway with two tracks.

For wage employment, a cofinanced internship scheme will place SEC graduates with concessionaires, sawmills, and community forest enterprises for three to six months, with stipend support cofinanced by the private sector. For self-employment, eligible graduates will receive a start-up package of small equipment grants, business development support, and market linkages to timber buyers and community forest enterprises. Both tracks will prioritize women and young people. A graduate tracer system will monitor outcomes and support adaptive management.

Subcomponent 3.3: Catalyzing Private Investment in Sustainable Timber Processing through Targeted Investment Promotion and Public-Private Partnerships

1. **This subcomponent will increase private investment in Liberia's forest sector through targeted promotion, facilitation, retention, and risk-sharing instruments such as PPPs for climate-resilient infrastructure.** Complementing Component 1 reforms, the project will strengthen the capacity of the FDA, National Investment Commission (NIC), and Liberia Special Economic Zones Authority (LSEZA) to attract new investors, support expansion by existing firms, and build backward linkages with clustered and trained CFMAs under Component 2. The following activities will be supported:
 - (a) **Forestry market intelligence and investment facilitation.** Eligible activities include establishing or strengthening a forestry market intelligence and investment facilitation platform,²⁴ training, promotional materials, outreach campaigns, backward linkage support, grievance mechanisms, public-private dialogue, and digital tools for investment promotion and monitoring.
 - (b) **Capacity building and a policy and regulatory framework for private investment.** This includes support to the FDA Commercial Department, review of incentive frameworks relevant to wood processing (for example, the Forestry Investment Code), and stronger regulations for commercialization in sawmills, plantations, NTFPs, and chainsaw mills.
 - (c) **Enabling climate-resilient infrastructure to de-risk private investment in value addition.** To address infrastructure gaps, the project will mobilize private capital through well-structured PPPs, including design-build-operate-transfer sawmills and eco-forestry lodges in two protected areas. Eligible activities include a Preparation Facility (PF) to finance pre-feasibility and feasibility studies covering economic, financial, commercial, environmental, social, and climate issues, and transaction advisory and legal support for PPP structuring. The facility will focus on transactions, producing bankable documents and investment-ready projects. It will also provide US\$5 million in public sector support for climate-resilient infrastructure projects²⁵

²⁴ The platform will consolidate technical, commercial, and spatial data required by prospective investors, including (a) domestic and regional demand trends for timber products, (b) commercial viability modeling for priority processing segments, and (c) GIS-based mapping.

²⁵ This includes investment to address gaps in roads to facilitate movement of logs, in energy to power wood-processing facilities, in containerized port facilities to enable export of processed wood, and in dedicated shared facilities such as Special Economic Zones (SEZs) and industrial parks to crowd in investment in sawmills and other related facilities for both timber products and NTFPs.



identified and prepared through the PF, with a clear handoff to commercial lenders, especially for SOP2.

- (d) **IFC Local Champions Initiative.** The project will identify high-potential MSMEs for the IFC Local Champions Initiative, which provides targeted advisory services to prepare firms for possible IFC investment.

Component 4: Project Management and Implementation

Key activities include establishing and operating the PIU with the staffing, training, tools, and logistics needed for central and regional teams, alongside annual work plans, budgets, procurement plans, and implementation schedules. The component will strengthen fiduciary management through improved procurement and contract management, sound systems, timely quarterly interim financial reports (IFRs), annual financial statements, and external audits. It will develop and operate a comprehensive monitoring and evaluation (M&E) system using the FDA Monitoring, Reporting, and Verification Framework and the Reducing Emissions from Deforestation and Forest Degradation (REDD+) Safeguards Information System for performance tracking and results verification, and support preparation of the Mid-term Review and Project Completion Report. It will also strengthen environmental and social management capacity in line with Environmental and Social Framework (ESF) requirements through clear roles, trained staff, operational tools, and targeted mentoring for regional teams. Finally, it will institutionalize standard operating procedures for subnational implementation, with clear reporting lines and periodic joint supervision missions to strengthen feedback between the field and FDA HQ.

2.5 Exclusion Criteria

The project applies both geographic and activity-based exclusion criteria. Geographically, the project will not operate in areas with unresolved boundary disputes, active concession conflicts, or within core zones of formally gazetted national parks. Activities that would convert or significantly degrade natural habitats, cause involuntary resettlement or displacement, adversely impact cultural heritage, threaten biodiversity or sensitive ecosystems, or involve illegal trade in wildlife or other prohibited goods will not be financed under the project.

The Project's environmental and social instruments will be used to screen eligible investments for environmental and social risks and impacts, including those related to the use of water resources and potential impacts on water quality. Any identified impact will be addressed through appropriate mitigation measures reflected in the applicable environmental and social instruments and in accordance with the requirements of the ESF. However, for Window 1 investment proposals and selection processes, these will be guided by a set of eligibility criteria

The activities that will be excluded are shown in table 1 below.

Table 1: Exclusion List – Activities That Will Not Be Financed under the Project

ESS Issues	Activities that will be excluded
Biodiversity Conservation and Sustainable Management of Living Natural Resources.	Activities causing significant degradation or conversion of natural habitat, including national parks, protected forests, and other types of conservation areas, for example, new infrastructures leading to fragmentation of important nature habitat. Activities with significant adverse impacts on biodiversity, particularly those threatening endangered species or ecosystems of high conservation value.



Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.	Large scale activities or infrastructures that are likely to generate a wide range of significant adverse risks and impacts on human populations or the environment: there will be no creation of new protected areas, extension of existing protected areas and community forests. Plantation activities involving large scale physical displacement of the population. Tree planting or afforestation activities on government-owned land that is contested by local communities regarding ownership: Existence of large-scale legacy or outstanding complaints regarding land acquisition process.
Community health and safety	Activities in areas affected by ongoing armed conflict or social unrest, where risks to communities and Project staff cannot be adequately mitigated.
Cultural heritage	Activities with potentially significant adverse impacts on cultural heritage sites that are registered in government data or recognized by communities as their ancestral heritage. This includes activities that may have an adverse impact on tangible and intangible cultural heritage. Site classified as national or international heritage / recognized archaeological site or one with high prehistoric potential.
Risk of exclusion of vulnerable groups	Large-scale activities negatively impacting livelihoods of rural communities and reliant on land and natural resources.
Sensitive ecosystems	Infrastructure and rehabilitation work and agricultural activities within or adjacent to classified environmental sites (RAMSAR, CITES, protected areas such as classified and community forests, and so on) where impacts could be long-term, permanent, and/or irreversible
Site with significant environmental constraints	Construction or rehabilitation of hydroelectric dam site. Large-scale infrastructure or interventions likely to cause widespread, irreversible, or cumulative risks and impacts on people or the environment, such as the creation or extension of protected areas or community forests without proper consultation or safeguards.
CFMA areas and PA buffer zones Non-Timber Forest Product (NTFP) in waterways	Negative list clarifying that no new schemes that might use water from or risk polluting waters of international waterways (including, inter alia, the Mano, Lofa, Moro, St. Paul, St. John, Gbeya, Cestos and Cavalla river systems) will be financed under the Project and that eligible activities that may rely on international waterways will be limited to small-scale upgrading, expansion and rehabilitation of existing schemes which will not adversely change the quantity and quality of water flows to other riparians; and will not be adversely affected by the other riparians' possible water use.
Illegal activities	Trade in wildlife or wildlife products regulated under CITES. Production or trade in tobacco and tobacco products. Production or trade or procurement of weapons and ammunitions.
Rangers	No financing for arms, weapons, military equipment or infrastructure. Project will also not provide advice on security or military policy, which is outside its technical competence and comparative advantage.



2.6 Proposed Subprojects covered by the ESMF

The potential sub-projects and activities proposed to be implemented by the project are as follows (table 2).

Table 2: Potential sub-projects and proposed activities

No	Component	Subcomponent	Sub-project/Activity	Description of Physical Works	Potential locations for works near PAs/RAMSAR
1	C1.2	Institutional Capacity & Performance	IT Infrastructure Deployment at FDA HQ and Regional Offices	Works will include procurement and installation of IT hardware servers, computers, networking equipment, backup systems at FDA headquarters in Monrovia and existing regional offices. No new construction. Activities confined to existing office buildings.	FDA headquarters in Monrovia and existing regional offices.
2	C1.2	Institutional Capacity & Performance	Secure Hosting Environment for LiberTrace	No civil works. IT system upgrades activity including SEAL migration, change-of-ownership approvals, local sales tracking, revenue reporting, and plywood processing modules. Physical footprint limited to server/hosting infrastructure within existing FDA premises	Within existing FDA premises
3	C1.2	Institutional Capacity & Performance	Forest Monitoring and GIS Unit - R&D Center	Physical establishment of a GIS and remote sensing unit within the FDA R&D Center, involving procurement and installation of GIS workstations, servers, large-format printers/plotters, and related equipment. May require minor refurbishment of existing office or laboratory space to accommodate the unit.	
4	C2.1	Community-Based NRM & Livelihoods	Establishment and formal recognition of 20 CFMAs and CFMBs	20 CFMB office structures could be constructed or rehabilitated across the project area. Land footprint across up to 20 CFMA areas in Gbarpolu, Grand Cape Mount, Rivercess, Grand Bassa, Grand Gedeh, and Sinoe Counties.	CFMAs in some counties may likely be in the GFNP buffer zone landscape. Similarly, CFMAs in Grand Cape Mount County may be in the LPMR buffer zone. CFMB offices in some locations may be sited adjacent to PA buffer zones.
5	C2.1	Community-Based NRM & Livelihoods	Boundary Marking and Demarcation of 20 CFMAs	Physical demarcation of CFMA boundaries using boundary markers, posts, signs, and cleared boundary lines across forest landscapes. While individually small-scale, the cumulative footprint across 20 CFMAs (including clustered CFMAs not more than 49,999 ha) is extensive, covering large areas of forest and community land. Involves clearing of boundary	Could overlap with the GFNP boundary and LPMR in Grand Cape Mount County



No	Component	Subcomponent	Sub-project/Activity	Description of Physical Works	Potential locations for works near PAs/RAMSAR
				paths/lines and physical placement of permanent markers.	
6	C2.1	Community-Based NRM & Livelihoods	Reduced-Impact Logging (RIL) within Clustered CFMAs	Implementation of commercial timber harvesting using reduced-impact logging techniques within newly established clustered CFMAs managing not more than 49,999 ha. Physical works include tree felling, log extraction using skidders or cable systems, construction of temporary logging roads/skid trails, log landings, and log sorting/storage areas. Significant physical footprint across large, forested areas.	Clustered CFMAs managing less than 50,000 ha and operating under Forest Management Contracts in Grand Cape Mount and Gbarpolu Counties would conduct RIL operations in the landscape surrounding GFNP.
7	C2.1	Community-Based NRM & Livelihoods	Matching grant scheme-Window 1: Early-stage household and community IGAs Matching grant scheme-Window 2: Mature CFMA-based MSME investments	As described above, under Subcomponents 2.1 and 2.3, Window 1 Nature-based matching grants mechanism will be administered to provide funds for proposed nature-based economic activities targeted at early-stage community and household-level enterprises in CFMA areas and protected area buffer zones. It finances sustainable and climate-resilient alternative livelihoods, particularly NTFP-based activities such as bamboo, rattan, bitter kola, honey, snails, and locusts, and small-scale investments in post-harvest and aggregation infrastructure, including storage, drying, and packaging utilizing renewable energy, with beneficiary co-financing contributions required. Processing equipment, storage structures, and market-integration infrastructure for more mature enterprises. Subproject footprint variable to be determined through individual subproject screening. Investments may include small, covered processing sheds, equipment sheds, and access tracks at community level	Processing infrastructure grant investments in the GFNP and LPMR buffer zones
8	C2.2	Forest Restoration & Timber Production	Establishment of 3,375 ha Community Woodlots	Land-based physical works: site preparation, land clearing of degraded areas, planting, and maintenance across approximately 3,375 ha. Distributed across CFMA areas in priority counties. Involves soil disturbance, planting of tree species, and potential minor access track	Surrounding landscape/buffer zone of Gola Forest National Park (GFNP) Grand Cape Mount and Gbarpolu Counties



No	Component	Subcomponent	Sub-project/Activity	Description of Physical Works	Potential locations for works near PAs/RAMSAR
				establishment	
9	C2.2	Forest Restoration & Timber Production	Rehabilitation of 9,741 ha of degraded tree plantations (rubber, cocoa, oil palm)	Land-based physical works on existing degraded plantation areas: clearing of overgrown vegetation, soil preparation, replanting, and silvicultural maintenance across approximately 9,741 ha. Located across multiple counties.	Surrounding landscape/buffer zone of Gola Forest National Park (GFNP) Grand Cape Mount and Gbarpolu Counties.
10	C2.2	Forest Restoration & Timber Production	Restoration of about 6,000 ha Degraded Forests and Lands	Land-based physical works: assisted natural regeneration, enrichment planting, and active restoration across approximately 6,000 ha in priority areas including areas surrounding Gola Forest National Park (Grand Cape Mount and Gbarpolu Counties). Involves soil disturbance, planting, and invasive species management.	Surrounding landscape/buffer zone of Gola Forest National Park (GFNP) Grand Cape Mount and Gbarpolu Counties
11	C2.2	Forest Restoration & Timber Production	Reduced-impact logging (RIL) within clustered CFMAs	RIL harvesting operations- skid trail construction, log landing preparation, post-harvest site rehabilitation	Surrounding landscape and buffer zone in GFNP in Grand Cape Mount and Gbarpolu Counties
	C2.3	Improved Management of Selected PAs	Staff Offices and Housing (GFNP and LPMR)	Construction or rehabilitation of staff offices and staff housing located at both GFNP and LPMR.	Within GFNP and LPMR in Grand Cape Mount and Gbarpolu county
13	C2.3	Improved Management of Selected PAs	PA boundary demarcation (GFNP and LPMR)	Physical boundary demarcation, along the park perimeter, placement of permanent markers and installation of signage at strategic entry points along and within PA boundaries of GFNP and LPMR. Activity along boundary corridors within existing PA legal boundaries.	Park perimeter and within PA boundaries of GFNP and LPMR in Grand Cape Mount and Gbarpolu county
14	C2.3	Improved Management of Selected PAs	Rehabilitation and Maintenance of Roads and Patrol Tracks (GFNP and LPMR)	Rehabilitation of internal patrol tracks within the park and access roads connecting surrounding communities to the GFNP. Rehabilitation of patrol tracks within the LPMR	Within GFNP and LPMR in Grand Cape Mount and Gbarpolu county
15	C2.3	Improved Management of Selected PAs	Community-based monitoring systems and capacity reinforcement	Equipment including vehicles, GPS, radio equipment, and disruptive technology for monitoring animal populations technology.	Deployed to field offices at GFNP and LPMR in Grand Cape Mount and Gbarpolu county
16	C2.3	Improved Management of Selected PAs	Ecotourism PPP (SOP 1)- Preparatory/Design Works (No Physical Construction;	SOP1: No civil work - feasibility assessment, market demand analysis, and ecotourism strategy preparation-- Informs SOP2	
	C2.3	Improved Management of Selected PAs	SOP2: Conditional Physical Works (Subject to Demonstrated	Ecolodge construction Visitor interpretation centers Tourist trail network tourism development sites	GFNP and/or LPMR in Grand Cape Mount and Gbarpolu county



No	Component	Subcomponent	Sub-project/Activity	Description of Physical Works	Potential locations for works near PAs/RAMSAR
			Market Demand)	Private sector concession infrastructure linked to PPP agreements	
17	C2.3	Improved Management of Selected PAs	Alternative livelihood support for PA buffer zone communities	Physical investments in PA buffer zones: NTFP processing facilities, beekeeping equipment, agroforestry plot establishment, and small storage structures.	communities buffer zones GFNP and LPMR in Grand Cape Mount and Gbarpolu county
18	C3.1	Support for Forestry Entrepreneurs	Forestry Enterprise Readiness and Derisking Program - Results-based financing (capital expenditure grants)	Procurement of productivity-enhancing equipment, small processing infrastructure, and technology systems. Physical footprint at individual MSME enterprise premises. May include minor construction of equipment sheds, storage, or processing space upgrades	
19	C3.2	Skills Development for Forestry Jobs	Rehabilitation of FTI facilities and establishment of Service Excellence Center (SEC)	Civil works: rehabilitation of existing FTI buildings structural repairs, electrical and plumbing upgrades, roofing, internal fittings. Procurement and installation of industry-standard equipment- investment-ready activities from pre-feasibility and feasibility studies under the PPP projects, design-build-operate-transfer (DBOT) models for sawmill, roads and ports infrastructure. Physical footprint confined to existing FTI campus. Potential for asbestos-containing materials in existing structures	
20	C3.3	Catalyzing Private Investment	PPP Project Preparation Facility: Pre-feasibility and feasibility studies (DBOT sawmills, roads, ports)	No civil works at this stage. Analytical and advisory services: economic, financial, commercial, environmental, and social feasibility studies; transaction advisory; legal structuring of contracts. Outputs are bankable documents.	
21	C3.3	Catalyzing Private Investment	PPP Infrastructure Development- DBOT sawmills, roads, and port infrastructure (conditional on feasibility outcomes)	High-risk civil works (if advanced under SOP2): construction of DBOT sawmill facilities, improvement of road corridors, and port infrastructure development at Greenville (Sinoe County) and Grand Bassa. Large physical footprint - specific site and scale determined through feasibility studies.	

The exact size, number, and locations of these potential Window 1 investments are not yet known and will be determined during project implementation. Although the actual activities have not yet been defined at this stage, some of the investments considered might rely on international waterways listed above (e.g., aquaculture investments and small nurseries that might rely on boreholes).



3. Environmental and Social Policies, Regulations, and Laws

This section summarizes the regulatory framework relevant/applicable to the LiFE-P implementation. The section will compare national regulatory and legal frameworks with the requirements of the World Bank Environment and Social Framework (ESF), identify gaps between these two pieces of instruments, and how propose measures by which these gaps will be addressed.

3.1 World Bank Environmental and Social Framework

The World Bank ESF seeks to support borrowers to develop and implement environmentally and socially sustainable projects as well as build capacity in the assessment and management of environmental and social impacts and risks associated with the implementation and operation of projects. The ESF contains 10 Environmental and Social Standards (ESSs) that borrowers must apply to all projects to be sustainable, non-discriminatory, transparent, participatory, environmentally and socially accountable as well as conform to good international practices. The Bank and the Government have agreed on the role and responsibility of the latter in identifying, mitigating and managing the E&S risks associated with the activities of this project, and this agreement is enshrined in the Environmental and Social Commitment Plan (ESCP), which forms part of the project’s legal agreement. Out of the ten ESSs, the relevant ESSs for the LiFE-P are presented in Table 3 below.



Table 3: Relevant World Bank Environmental and Social Standards that apply to the LiFE-P

Environmental and Social Standard (ESS)	Key Requirements	Status	Remarks/Comments
Environmental and Social Standard 1 (ESS1): Assessment and Management of Environmental and Impacts and Risks	ESS1 provides structured processes or procedures for project categorization, assessing and evaluating project environmental and social risks and impacts, as well as management of same (mitigation hierarchy). This standard also sets out Borrower's requirements, including the preparation of various instruments such as Environmental and Social Management Frameworks, Environmental and Social Impact Assessment, Environmental and Social Management Plans and Environmental and Social Commitment Plans as well as information disclosure. The standard also lays out project environmental and social monitoring and reporting requirements. ESS1 establishes the applicability of the other ESSs. It establishes the basis for categorizing projects based on the borrower's capacity to manage and monitor environmental and social risks/impacts as well as the implementation of mitigation measures, socio-political context, scale of the undertaken as well as spatial extent and significance of anticipated impacts and Risks	Relevant	ESS1 is the overarching standard for assessing and managing environmental and social risks and impacts. Given that specific locations and details of proposed project activities have not yet been identified. To fulfill the Pelosi Amendment requirement, the client has disclosed the Environmental and Social Management Framework (ESMF), including Labor Management Procedures as an annex, on May 15, 2026. Prior to appraisal, the project will develop and disclose the Environmental and Social Commitment Plan (ESCP), a Stakeholder Engagement Plan, Resettlement Framework, and Process Framework. In addition, the project will conduct an Institutional Assessment (IA) to identify key institutional gaps and ensure effective ESF implementation and compliance with the World Bank Interim Guidance Note on Protected Areas; the IA will be disclosed 3 months after project effective date. The project will also develop a Security Management Plan (SMP) prior to appraisal to address risks associated with the use of security personnel in and around protected areas, consistent with ESS4 and applicable Good Practice Note. The project will conduct a Strategic Environmental and Social Assessment (SESA) of the legal, regulatory, and institutional reforms supported under Component 1, and disclose the SESA within 12 months after the Project's Effective Date. The Project will prepare a draft SEA/SH action plan and accountability framework by appraisal and will finalize it within 3 months following Project effective date The ESMF will provide screening procedures and serve as the basis for developing site-specific



Environmental and Social Standard (ESS)	Key Requirements	Status	Remarks/Comments
			ESIA/ESMPs, and Biodiversity Management Plans later. The RF and PF will guide development of Resettlement Plans for project-related land acquisition or restrictions on resource use. IA will assess law enforcement role of FDA (use of security personnel for the project).
Environmental and Social Standard 2 (ESS2): Labor and Working Conditions	It is to ensure a safe, healthy and conducive working environment for workers and ensure that the environment is free of forced and child labor as well as other forms of intimidation, discrimination and harassment. ESS2 also ensures that workers have channels for grievance resolution, freedom of association and access to collective bargaining rights as prescribed by national law. The standard also seeks to protect vulnerable workers. The Labor and Working Conditions requirements will cover all project workers in this project: direct, community and contract workers as well as primary supply workers.	Relevant	ESS2 is relevant. The project will employ direct workers and contracted workers across forestry, restoration, and processing activities. A Labor management procedure (LMP) has been developed by appraisal to set out terms of employment, working conditions, and OHS measures, including training for high-risk activities such as sawmilling, roads and ports infrastructure (under PPP arrangements through pre-feasibility and feasibility studies) plantation management, and machinery use. The project will establish a dedicated workplace grievance mechanism including provisions to address SEA/SH and accountability framework related complaints before project workers are hired. The project will institute measures to avoid forced labor and child labor risks. The project will develop institutional assessment and security management plan by appraisal to ensure the risks related to the use of security personnel are mitigated. Project GM and workers' GM will be responsive to SEA/SH complaints management in a survivor centered manner.
Environmental and Social Standard 3 (ESS3): Resource Efficiency and Pollution Prevention and Management	ESS 3 promotes sustainable resource utilization, avoiding and/or minimizing project pollution, generation of hazardous and non-hazardous waste and project-related emissions. This standard enjoins Borrowers to ensure efficient use of energy, water and other raw materials as well as manage air pollution, hazardous and non-hazardous waste, chemicals and	Relevant	ESS3 is relevant given the project's activities in forestry, timber processing, plantations, livelihood, and value chain activities, which entail resource use and may generate waste, emission and pollution. The potential risks and impacts include soil and water contamination from agrochemicals, air emissions, noise, wastewater, and solid waste from



Environmental and Social Standard (ESS)	Key Requirements	Status	Remarks/Comments
	hazardous materials (including pesticides) in both degraded and non-degraded areas given their technical and financial feasibility in line with Good International Industry Practice (GIIP).		sawmilling, roads and ports infrastructure (under PPP arrangements through pre-feasibility and feasibility studies) and processing facilities, as well as cumulative pressures on water and energy resources. To manage these risks, the project will integrate soil and water conservation practices and promote sustainable harvesting practices to minimize waste and maximize timber utilization. Specific mitigation and resource-efficiency measures will be detailed in ESMF and site-specific ESMPs.
Environmental and Social Standard 4 (ESS4): Community Health and Safety	Environmental and Social Standard 4 (ESS4) is titled “Community Health and Safety”. The objective of this standard is to anticipate, avoid and/or mitigate adverse project impacts on beneficiary communities as well as safeguard project-affected communities from traffic and road safety risks, diseases and hazardous materials associated with project implementation and operation.	Relevant	ESS4 is relevant, as the project will involve developing infrastructure, including sawmilling, roads and ports infrastructure (under PPP arrangements through pre-feasibility and feasibility studies), park facilities, and forest harvesting operations, which may pose community health and safety risks. Potential risks and impacts may include structural failures, fire-related injuries (burns, smoke inhalation), falls, contact with heavy equipment, respiratory issues from dust, fumes or noxious odors, traffic and road safety hazards, labor influx, and exposure to hazardous materials .In forest landscapes, communities may also face human–wildlife conflict. These risks and impacts will be assessed within the ESMF and, where required, addressed through site-specific ESMPs for subprojects. The ESMPs will incorporate measures for structural safety, life and safety provisions. The project will ensure universal access. SMP and SEA/SH action plan and accountability framework will be developed so that the use of security personnel related risks including SEA/SH risks against communities are mitigated.
Environmental and Social Standard	ESS 5 acknowledges that project-related land acquisition and land-use limitations can negatively	Relevant	ESS5 is relevant. The project may involve land acquisition, involuntary resettlement and/or access



Environmental and Social Standard (ESS)	Key Requirements	Status	Remarks/Comments
(ESS5)- Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	affect communities and individuals. Physical displacement (relocation, loss of residential land, or loss of shelter) or economic displacement (loss of land, assets, or access to assets leading to loss of revenue sources or other means of subsistence) may result from project-related land acquisition or limits on land usage.		restrictions due to activities such as, establishment of nurseries, provision of solar-powered water systems, rehabilitation and restoration of degraded landscapes, Park infrastructure development, market-linked enterprises, establishment of community-inclusive timber processing industries, revitalizing existing FDA timber plantations etc. The project has developed a resettlement framework (RF) to identify these issues by appraisal. The project may develop resettlement plan/s later, if applicable. The project may create new access restrictions to the Protected Areas or improve the enforcement of existing restrictions; therefore a process framework has been developed to detail the processes by which all stakeholders will participate in the design of project activities and measures in a way that addresses the adverse impacts of these restrictions
Environmental and Social Standard- (ESS6) - Biodiversity Conservation and Sustainable Management of Living Natural Resources		Relevant	It is relevant given the project's support for activities in Liberia's biodiversity-rich forest landscapes that host endemic and threatened species. Core activities, including community-based natural resource management, forest restoration, sustainable timber production, and development of non-timber forest products—may pose risks to sensitive habitats and biodiversity. Potential adverse impacts include habitat loss and fragmentation, over harvesting, soil erosion, degradation of water and soil quality, invasive species introduction, poaching and human-wildlife conflict. ESMF will include biodiversity-related screening & mitigation measures. Where screening identifies significant biodiversity risks, a BMP will be prepared and implemented (See draft outline of BMP in annex 8). Activities in PA or critical habitats will comply with



Environmental and Social Standard (ESS)	Key Requirements	Status	Remarks/Comments
			ESS6 requirements and align with national biodiversity strategies and PA management plans. Capacity building of FDA and partners will be key for biodiversity monitoring and safeguards compliance
Environmental and Social Standard (ESS8) - Cultural Heritage	It defines cultural heritage elements to include tangible assets such as shrines, artifacts and stones and intangible assets such as taboos. ESS 8 lays out the Bank's requirements for development within or close to culturally sensitive zones. This standard also discusses the requirements that should be met prior to the development of projects that are likely to have adverse risks and impacts on cultural heritage sites and resources. The critical requirements include meaningful consultation with affected persons, experts and other interested parties, confidentiality/disclosure as well as movement and commercial use of cultural (heritage) resources. The Bank's Environmental and Social Standard on Cultural Heritage seeks to protect cultural heritage resources from adverse project impacts and establish them as an integral part of sustainable development.	Relevant	ESS8 is relevant due to potential impacts on cultural heritage from forest restoration, timber production, and community-based resource management. Risks include disturbance to unknown archaeological resources from excavations and earthworks and impacts on recognized or community-significant heritage sites. A cultural heritage assessment has been conducted as part of the ESMF, with robust stakeholder consultations, especially with affected communities and authorities. Avoidance is the primary mitigation strategy; activities will be designed to steer clear of known sensitive sites. A Chance Finds Procedure will be included in all works contracts and staff will be trained to implement it. Where significant risks are identified, a Cultural Heritage Management Plan (CHMP) will be prepared (Appendix 10 and 11).
Environmental and Social Standard (ESS10) - Stakeholder Engagement and Information Disclosure	ESS10 establishes a systematic approach to stakeholder engagement while ensuring that appropriate information on project risks and impacts is provided to stakeholders in a timely, comprehensive, accessible, and appropriate manner. The standard also ensures inclusive and effective engagement of project-affected parties throughout the project cycle and provides avenues for assessing stakeholder interest and incorporating their views into project design and monitoring of projects.	Relevant	The project is conducting consultations with community women and men in project counties, and other stakeholders and a stakeholder engagement plan will be developed by appraisal. Forested communities, farmers households of selected project counties are part of project affected parties. Women (single, widowed, female headed households, young women etc.), marginalized youth, persons with disability in project locations constitute the disadvantaged or vulnerable groups. Private sector actors including private sector rubber farmers' associations, specialized business intermediaries, financial institutions, universities, and technical institutes will be part of interested parties. The

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Environmental and Social Standard (ESS)	Key Requirements	Status	Remarks/Comments
			project will also conduct consultations to develop process framework and institutional assessment, by appraisal, to address the adverse impacts of potential restrictions, and assess the law enforcement functions of the client respectively. Security management plan will also be developed by appraisal.



3.2 Project Categorization under the World Bank ESF

Under the World Bank ESF, the World Bank classifies projects into four (4) categories: High, Substantial, Moderate and Low Risk largely based on the scale of the project, level of impact, environmental and social sensitivities and risks associated with the project, in country socio-political conditions as well as the capacity of the borrower to manage the associated impacts and risks.

Based on the nature and scope of project activities primarily under component 2 (Sustainable Forest Resource Development and Resilient Livelihoods) and 3 (Creating Enabling Conditions for Private Investment in Commercial Forestry for More and Better Jobs) and the capacity of the FDA/PIU in Liberia to manage the environmental risks of project activities consistent with the ESSs, the risk rating is assessed to be High at this stage.

The risk of Sexual Exploitation, Abuse, and Sexual Harassment (SEA/SH) is substantial, due to civil works, increase in labor influx, livelihoods activities, and use of security personnel. An SEA/SH action plan and accountability framework will be prepared by appraisal and will be finalized within 3 months following Project effective date. And implemented by FDA/PIU throughout Project implementation, including recruiting a service provider and GBV/SEA/SH expert. Provisions in the SEA/SH Action Plan and accountability framework requiring contractors to adopt and enforce SEA/SH Codes of Conduct, mandatory worker training, establishment of referral pathways to qualified GBV service providers, and community awareness sessions (with women and youth) on SEA/SH risks and available reporting options will be prepared by the FDA/PIU by project appraisal. The Project will leverage existing SEA/SH risk action plan and accountability framework and ensure a responsive Grievance mechanism (GM), worker training, and an Accountability and Response Framework.

Stakeholder engagement will focus on inclusive participation and information disclosure using appropriate language and media. Key stakeholders include the FDA, relevant Government & Regulatory Institutions and sub- national level in potential target counties, community representatives and organizations. Other key stakeholders include community women and men in project counties, forested communities, farmers households of selected project counties are part of project affected parties. Women (single, widowed, female headed households, young women etc.), marginalized youth, persons with disability in project locations constitute the disadvantaged or vulnerable groups. Private sector actors including private sector rubber farmers' associations, specialized business intermediaries, financial institutions, universities, and technical institutes will be part of interested parties. A Stakeholder Engagement Plan (SEP) has been prepared, proportional to the project's nature, scale, risks, and impacts. The SEP will be disclosed by project appraisal; ensuring consultations are timely, relevant, understandable, and accessible. A documented record of stakeholder engagement at different stages of the project cycle will be maintained and publicly disclosed. A project-wide GM will address concerns, including a confidential channel for SEA/SH issues. Local actors and liaison officers may be designated to coordinate the SEP implementation.

The LiFE-P GM will provide multiple GM channels through which project-affected parties can submit grievances, across Gbarpolu, Grand Cape Mount, Rivercess, Grand Bassa, Grand Gedeh, and Sinoe Counties. At the community level, the primary submission channels are physical grievance registers maintained at CFMB offices in each CFMA, PA stations at Gola Forest National Park and Lake Piso MUR, and designated community grievance focal points/committees. At the county level, grievances can be submitted directly to FDA Regional Offices located in each of the project's geographic clusters. At the national level, grievances can be submitted directly to the PIU at FDA headquarters in Monrovia through



in-person submission, written letters, email to a dedicated GM email address, and toll-free telephone lines.

The FDA PIU shall prepare a dedicated Grievance mechanism (GM) Manual within the first six months of project effectiveness. The GM Manual is a standalone operational document that translates the principles, channels, tiers, and processes described in the ESMF and the SEP into detailed, step-by-step procedural guidance for all parties responsible for implementing the GM including PIU staff, FDA Regional Foresters and their designated E&S Focal Points/Committees, community grievance focal points/committees, CFMB Executive Committees, private sector service providers, and civil works contractors.

The EPA is mandated to review and approve environmental and social studies and have prior experience with Bank-financed operations and some exposure to the Bank's safeguard policies and the ESF, but their technical and operational depth remains limited. To address the limited knowledge of the ESF among borrowing clients, the Bank staff will continue to provide capacity development and training programs.

When there is adequate information about the Project locations, scope of investment and the corresponding risks, the Project E&S risks will be reassessed based on the scope of Project activities and determine if it needs revision to upgrade the E&S risk rating and additional E&S instruments as needed.

3.3 Relevant World Bank Group Guidelines

The guidelines relevant to the project, and that will be summarized here are:

- The World Bank Environment and Social Framework (ESF), 2017
- World Bank Group Environmental, Health and Safety Guideline (EHSG), 2007 (General Guidelines)
- World Bank Group Environmental, Health, and Safety (EHS) Guidelines: Sub-sectors in forestry²⁶
- General EHS Guidelines (Environmental; OHS; Community Health & Safety; Construction and Decommissioning)
- ESF Guidance notes for Borrowers
- Good Practice Note for Managing the Risks of Projects Involving Protected and Conserved Areas with Annexes I-XII
- Good Practice Note for Road Safety
- ESF Good Practice for assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx
- Good Practice Note Addressing Sexual Exploitation and Abuse and Sexual Harassment in the Financing of Investment Projects involving Major Civil Works
- Good Practice Note for Non-discrimination and Disability
- Good Practice Note: Non-Discrimination Sexual Orientation and Gender Identity (SOGI)
- Good Practice Note for Gender
- Good Practice Note: Assessing and Managing the Risks and Impacts of the Use of Security Personnel

²⁶ World Bank Group Environmental, Health, and Safety (EHS) Guidelines: Sub-sectors in forestry.
<https://www.ifc.org/en/insights-reports/general-environmental-health-and-safety-guidelines/ehs-guidelines-forestry>



The principal guiding instrument is the World Bank ESF, which sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of Environmental and Social Standards that are designed to support Borrowers' projects, with the aim of ending extreme poverty and promoting shared prosperity. The Environmental, Health and Safety Guideline (EHS), also apply to the Project. The EHS Guidelines are technical reference documents with general and industry specific examples of Good International Industry Practice.

3.4 National Regulatory Framework on Forests Protected Areas, Environmental and Social

Table 4: Relevant Forestry regulatory framework and National Environmental and Social Policies

No.	National Regulatory Framework
1	The National Forestry Reform Law (NFRL) of 2006 The National Forestry Reform Law sets sustainable forest management as a national goal and restructures the Forestry Development Authority to balance community, commercial, and conservation forestry. It designates most forest resources as public trust, introduces transparent contracts and permits, and requires competitive allocation and compliance with management guidelines supported by a chain-of-custody system for legality and transparency. The law aims to expand protected areas, develop reforestation policy, and promote public participation and benefit sharing, further strengthened by later regulations and the 2009 Community Rights Law.
2	Protected Forest Areas Network Law (2003) The Act for the Establishment of a Protected Forest Areas Network required a biologically representative network of protected areas to be established covering at least 30 percent of the existing forest area, comprising about 1.5 million hectares.
3	Act to Establish the Community Rights Law with respect to Forest Lands (2009) The law creates a legal framework that defines and supports community rights in the management and use of community and traditional lands and forest resources.
4	National Wildlife Conservation and Protected Areas Management Law (2016) The Law updates the 1988 law on wildlife and national parks. It implements Liberia's obligations under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the Convention on Biological Diversity (CBD), and the Ramsar Convention. It includes provisions for Protected Areas (National Parks, Nature Reserves, Community Wildlife Areas), Wetland Conservation as part of protected ecosystems and community-based forest and wildlife management.
5	Wetland Regulations of Liberia (2024) These regulations aim to protect and manage the country's wetlands by classifying them into three categories: fully protected, partially protected, and community-conserved wetlands. These regulations require permits to be sought at the EPA for activities proposed within wetlands.
6	Liberia forest sector strategy 2025-2029 The Liberia Forest Sector Strategy 2025-2029 is the Government of Liberia's primary sectoral framework for the sustainable management, development, and conservation of Liberia's forest resources over the current national planning cycle. It is developed and implemented by the Forest Development Authority (FDA) and is directly anchored in and constitutes the forestry chapter of the national development plan, the ARREST Agenda for Inclusive Development 2025–2029 (AAID). The strategy supersedes the 2006 National Forestry Policy and the 2007 National Forest Management Strategy, both of which had become obsolete in the face of emerging governance challenges, climate commitments, and shifting tenure and value chain dynamics.
7	ARREST Agenda for Inclusive Development 2025–2029 (AAID) The ARREST Agenda for Inclusive Development 2025–2029 (AAID) is Liberia's national plan under the Government of Liberia national development agenda, focusing on Agribusiness, Roads, Rule of Law, Education, Sanitation, and Tourism. Environmental Sustainability links these priorities by aiming to restore ecosystems, stop deforestation, promote sustainable land use, create jobs in forest enterprises, and encourage conservation through incentives such as carbon credits and ecosystem payments. The agenda sees Liberia's forests as valuable resources for poverty reduction and inclusive growth.



	National Legislation and Environmental and Social Policy Framework
8	Constitution of the Republic of Liberia The 1986 Constitution is the main legal framework which provides for the rights, equal treatment, and protection of all Liberian citizens and those residing within the borders of Liberia. It ensures that no citizen is discriminated against on the basis of sex, age, ethnic background, religious belief, political affiliation, social and economic status.
9	The Environment Protection Agency (EPA) Act (2003) The Act provides the EPA with the authority of government for the protection and management of the environment in Liberia. It provides for an Environmental Administrative Court to hear from aggrieved parties and requires that an ESIA be carried out for all activities and projects likely to have an adverse impact on the environment.
10	Environment Protection and Management Law (EPML) (2003) The law enables the EPA to protect the environment through the implementation of the Law. It arranges the rules, regulations, and procedures for the conduct of ESIA's and establishes regulations for environmental quality standards, pollution control and licensing, among others.
11	Water Resources (Wetlands, Rivers, Lakes, Groundwater and Sea Shore) Management Regulations (2009) These Regulations are pursuant of the provisions of the EPML (2003) and apply to all water resources and water bodies in Liberia, including wetlands, rivers, lakes, groundwater, and coastal zones.
12	Water Quality Regulations of Liberia (Draft) (2024) These Regulations ban pollution of inland, coastal, and marine waters, setting maximum concentrations for water used domestically, in effluent discharge, irrigation, and recreation. They outline compliance, enforcement, and offenses. A license is required before abstracting water or discharging effluent into aquatic environments. In December 2024, updated standards were approved, covering air quality, wetlands, solid waste, radiation, landfills, and water, to improve monitoring and enforcement for pollution control and licensing.
13	Liberia Waste Management and Standards Regulations (2009) These Regulations are pursuant of the provisions of the EPML (2003) and apply to all categories of waste: household, industrial, biomedical, hazardous, and radioactive. They require licenses for solid and hazardous waste disposal, effluent discharge, and pollution emission. They also mandate environmental audits and compliance monitoring.
14	Aborigines Law (1956) The Act states that each tribe is entitled to the use of as much of the public land in the area inhabited by the tribe, as is required for farming and other enterprises essential to tribal necessities. It shall have the possession of such land as against any other person. It goes further to say that the omission of a tribe to have its territory so delimited shall not however, affect in any way its right to the use of the land. While this Act allows tribal people to own and use the land for living and productive activities, it does not allow the individuals or groups using the land to transfer the land to another user.
15	Property Law (1976) The Law established the conditions under which a Liberian can own real property and dispose of. It states that one must hold title documents for such land and when transferring same, it shall be done by title, duly registered. Land acquired under this law allows the owner to convey or transfer it to another person(s) or entity through legal process.
16	Liberia Land Commission Act (2009) The objective of this Act is to propose, advocate and coordinate reforms of land policy, laws and programs in Liberia. It does not have adjudatory or implementation role. The goal of the commission is "to develop comprehensive national land tenure and land use system that will provide equitable access to land and security of tenure so as to facilitate inclusive sustained growth and development, ensure peace and security and provide sustainable management of the environment".
17	Land Rights Act (2018) The Act is part of the recent land reform process in Liberia. The act repeals the Aborigines Law (1956) and defines the different categories of land ownership and rights in Liberia. The act prescribes the means by



	which each of the categories of land may be acquired, used, transferred and otherwise managed. It ensures that all communities, families, individuals and legal entities enjoy secure land rights, and ensures equal access and equal protection with respect to land ownership, use and management, including ensuring that Customary Land is given protection equal to Private Land and that land ownership is permitted for all Liberians.
18	Liberian Code of Laws (Zoning Law Title) (1958) Includes basic zoning regulations within the broader legal code. These provisions established fundamental land-use classifications and building requirements for urban areas.
19	New Zoning Law (Draft) (2024) The proposed law introduces comprehensive land use planning standards, integrates climate adaptation measures, and promotes sustainable urban development.
20	Decent Work Act (2015) The Act establishes the legal framework for labor rights, working conditions, and occupational health and safety in Liberia. The Act prohibits forced or compulsory labor and sexual harassment at work. Under this Act, no child (under 18) can be engaged to do work likely to harm their health, safety, or welfare; children under 18 are prohibited from engaging in hazardous work. The minimum age for employment is set at 15 years.
21	Social Security Act (2017) Liberia's Social Security Act provides a contributory system offering pensions, employment injury benefits, and welfare benefits for registered workers. It sets eligibility, funding, and benefit formulas, and is administered by the National Social Security and Welfare Corporation (NASSCORP), ensuring income security for old age, disability, work injury, and survivors.
22	Public Health Law, Revised (2022) This law is the revised version of the 1976 public health law. It provides to a wide array of matters concerning public health, including, among other things, animal diseases, communicable diseases, veterinary drugs, environmental sanitation, hygiene in food establishments, control of parasites and mosquitoes, placing on the market of food, freshwater pollution and drinking water.
23	Children's Law 2011 Liberia's comprehensive child rights statute domesticating the UN Convention on the Rights of the Child; it defines a child as under 18 and guarantees rights to survival, development, education, health, and protection, mandates birth registration, prohibits early marriage and harmful practices, and establishes duties and coordination mechanisms for state and community actors to prevent abuse, exploitation, and neglect, guided by the "best interests of the child" principle
24	Hazardous and Light Work Lists for Children in Liberia 2023 Regulatory schedules issued by the Ministry of Labor that (a) prohibit persons under 18 from specific hazardous tasks (e.g., mining/quarrying, work at heights or in confined spaces, with dangerous machinery or chemicals, night work) and (b) permit strictly limited "light work" for 13–14-year-olds that does not harm health or schooling (e.g., capped daily/weekly hours), operationalizing the Decent Work Act and ILO standards; the lists were endorsed in 2022 and are referenced in 2023 monitoring and enforcement guidance
25	Domestic Violence Act (2019) Establishes criminal and protective measures against domestic violence, defining physical, sexual, psychological, and economic abuse within domestic relationships; provides for protection orders, reporting and referral mechanisms, and victim support (including counseling and compensation orders), and strengthens penalties for aggravated cases forming a core part of Liberia's legal framework to prevent and respond to domestic abuse
26	Rape Act (2005) Liberia's Rape Act (2005) amended Penal Code Chapter 14, replacing Sections 14.70 and 14.71 to define rape broadly as intentional penetration. it clarifies consent as agreement made by free choice with capacity, and specifies circumstances where consent is presumed absent (such as use or threat of violence, incapacity, or impersonation). The Act also creates the offense of gang rape, provides for certain trials to be heard in camera, and establishes grading and penalties: rape is a first-degree felony—



	punishable by up to life imprisonment where aggravating factors apply (including the survivor being under 18 or serious bodily injury), and a second-degree felony otherwise
	National Environmental and Social Policies
27	National Environmental Policy (2003) The policy provides a systematic and logical framework by which to address environmental issues. Section 4.7 of the policy calls for an ESIA on all major developmental, socioeconomic and land use activities in any form that may have adverse effects/impacts on the environment to one degree or another.
28	ESIA Revised Procedural Guidelines (2022) The ESIA Revised Procedural Guidelines provides the latest administrative procedures and requirements for the preparation of EIAs to ensure effective environmental governance.
29	EPA Strategic Plan (2025–2029) The Plan focuses on enhancing environmental governance through decentralization, capacity building, process modernization, and compliance enforcement. It aims to strengthen the EPA's operational effectiveness and align its activities with national development goals.
30	National Biodiversity Strategy and Action Plan (2025-2030) The EPA, with UNDP and FAO, is validating the National Biodiversity Strategy and Action Plan (2025–2030). The plan aligns with global frameworks, focuses on stopping biodiversity loss, restoring ecosystems, building climate resilience, and ensuring fair benefits. It supports the 30x30 target and includes biodiversity financing mechanisms.
31	National Gender Policy (NGP, 2009) The NGP, overseen by the Ministry of Gender, Children and Social Protection, guides gender mainstreaming and empowers women and vulnerable groups in national development. Its aims are to ensure gender-equitable socioeconomic progress, boost women's empowerment, and create gender-responsive opportunities for equal participation and access to resources. Section 4.1.6 tackles human rights and GBV by mandating support programs, shelters, psychosocial care, and stronger legislation against rape, exploitation, domestic violence, forced marriage, and trafficking. Section 4.1.9 addresses sexual and reproductive health, including free medical care for rape survivors and efforts to eliminate harmful traditional practices.
32	National Solid Waste Management Policy (NSWMP) (2024) Validated by the EPA on October 17, 2024, the NSWMP provides a national framework for waste management in Liberia. It promotes sustainable and equitable practices, strengthens local government responsibility, and prioritizes environmental protection, public health, and climate resilience. Aligned with the ARREST Agenda and SDGs, the policy encourages public-private partnerships, community engagement, and capacity building to reduce illegal dumping, improve sanitation, and address flooding and emissions moving Liberia toward a cleaner future.
33	National Strategy for Reducing Emissions from Deforestation and Forest Degradation (REDD+) (2016) The document lists Strategic Priorities: (i) minimise forest loss from pit sawing, charcoal production, and shifting agriculture; (ii) lessen commercial logging impact; (iii) establish and manage Protected Areas; (iv) protect high carbon and conservation value forests in agricultural and mining concessions; and (v) ensure fair, sustainable REDD+ benefits. Each priority includes specific Strategy Options outlining implementation steps.
34	National Policy and Response Strategy on Climate Change (NPRSCC, 2018) The policy outlines key principles for analysing, mitigating, and preventing climate change impacts in Liberia. It identifies forestry, agriculture, coastal areas, water, fisheries, energy, mining, industry, transport, tourism, infrastructure, urbanization, health, and settlement as priority sectors for adaptation.
35	National Adaptation Plan (2020-2030) The Plan provides a framework for climate risk management, capacity building, and coordination among government and private sectors to promote adaptation and climate-resilient development
36	Liberia's Revised Nationally Determined Contribution (NDC) (2021) This revised NDC is a 10-year nationwide sectoral document aiming at reducing the economy-wide greenhouse gas emissions by 64% below the projected business-as-usual level by 2030 through greenhouse gas mitigation and adaptation targets across various sectors including Agriculture, Forests,



	Coastal zones, Fisheries, Health, Transport, Industry, Energy, and Waste.
37	Land Rights Policy (2013) The Policy provides recommendations for land rights in Liberia, centered on four basic types of rights: public land, Government land, customary land, and private land. It defines a Protected Area as a land which may fall under the Government Land, customary land, or private land categories, but which must be conserved for the benefit of all Liberians. The document recognizes that women's land rights are often less protected than those of men and aims to give equal protection to the land rights of men and women.
38	National Occupational Health and Safety (OHS) Guidelines (2023) The Policy contains plans for improving the environmental and occupational health situation in Liberia. The Policy provides standards for workplace safety and health risk management within Liberia. It integrates gender considerations and aligns with international labor standards.
39	National Disaster Management Policy (NDMP, 2012) The National Disaster Management Policy (NDMP), adopted in 2012 alongside the Act to Establish the National Disaster Management Agency (NDMA), provides the institutional and operational framework for disaster risk management (DRM) in Liberia and to coordinate all disaster management activities at national, county, district, and chiefdom levels, integrating both state and non-state actors.

3.5 Land ownership in Liberia

Land ownership in Liberia is characterized by a dual tenure system, formal statutory ownership and customary tenure. The constitutional foundation for property rights is established in Articles 22, 24, and 26 of the 1986 Constitution of Liberia, which guarantee all citizens the right to own property individually or collectively, while explicitly excluding mineral resources on or beneath the land from private ownership and permitting expropriation only for public interest with prompt and just compensation. For most of Liberia's post-independence history, land was broadly classified as either public or private, with rural customary lands, managed under traditional tenure systems and legally designated as public land owned by the state. Liberia's land tenure system came with the enactment of the Land Rights Act (LRA) of 2018. The LRA formally recognizes four categories of land ownership: Public Land (held in trust by the government for the people), Government Land (owned and used directly by the state), Private Land (owned by Liberian citizens, sole proprietorships, partnerships, corporations wholly owned by Liberians, or benevolent institutions), and Customary Land (collectively owned by land-owning communities). The LRA vests governance of customary land in Community Land Management and Development Committees, elected by community members, including equal representation of youth, men, and women who serve as the highest decision-making authority over land use, allocation, and management within the customary community. Under this framework, communities may subdivide their customary land into functional categories including residential, agricultural, commercial, industrial/mining, cultural shrine/heritage sites, protected areas, and forest land.

For the LiFE-P, where land tenure context is of direct relevance, as activities engaging forest communities, concessionaires, and private investors in selected forest landscapes will require careful attention to customary land rights, community consent, and the operationalization of the LRA's provisions at the local level.

3.5.1 Forest ownership, tenure and management

Ownership of forest land

According to the Liberia forest sector strategy 2025-2029, the 2013 Land Rights Policy and 2018 Land Rights Act Land ownership in Liberia classified forest land as follows:

- Government land; it includes protected areas and proposed protected areas
- Private land (owned by private persons)



- Customary land – owned by a community; it includes communal forest lands, defined as areas set aside by law for use by communities
- Public land – which is none of the former

Forest tenure and management

- Ownership over forest resources: The National Forest Reform Law of 2006 states that all forest resources in Liberia are held in trust by the Republic for the benefit of the people – except forest resources located in communal forests, or forest resources that have been developed on private or deeded land through artificial regeneration.
- Use of forest resources: The Land Rights Act of 2018 states that a community may use its forest lands and harvest timber and non-timber products in keeping with the Community Rights Law of 2009 and the National Forest Reform Law of 2006. Community forests have a non-commercial purpose in principle, but commercial use can be allowed by the FDA in form of a community forest management agreement.

3.6 Free, Prior and Informed Consent (FPIC)

Free, Prior and Informed Consent (FPIC) is established in Liberian law and practice. It is a way to protect the rights of communities by involving them in decisions about developments that affect land or resources where they live. FPIC is most prominent and defined in the forestry sector, but it has a wider purpose as a means of protecting community rights and upholding the participation of Liberian citizens in decisions about the use of land and resources. FPIC has a firm legal basis in Liberian laws and regulations, although this is limited to certain sectors and activities.

Scope of FPIC Guidelines for Liberia: The FDA is required to consult with communities prior to designating an area for commercial, conservation, community use or a combination of permissible forest uses. With respect to logging, the FDA is required to obtain ‘free, prior, informed consent in writing’ from would-be affected communities through their representative body, notably a Community Forestry Development Committee (CFDC), prior to granting a logging concession in their area. Furthermore, when a logging company has been awarded a Forest Management Contract or Timber Sale Contract, it is required to negotiate and sign a Social Agreement, through which communities explicitly give their consent to the logging operation, with clear terms and conditions under which logging can proceed. Table 5 presents the National Policy and Regulatory Framework on FPIC.

Table 5: National Policy and Regulatory Framework on FPIC

No	National Policy and Regulatory Framework on FPIC
1	Constitution of the Republic of Liberia (1986) While the Liberian Constitution does not require FPIC, it does specify that: ‘The Republic shall... manage the national economy and the natural resources of Liberia in such manner as shall ensure the maximum feasible participation of Liberian citizens under conditions of equality as to advance the general welfare of the Liberian people and the economic development of Liberia.’
2	Land Rights Act (2018) Article 32(3): This is the most direct legal mandate for FPIC in Liberia. It states that "any interference with or use of the surface of Customary Land requires the Free, Prior, and Informed Consent (FPIC) of the Community". Article 42(2) & (3): Requires a process compliant with FPIC principles for any negotiations regarding "Proposed Protected Areas" that have not yet been officially gazetted.
3	Community Rights Law (2009) with Respect to Forest Lands While the acronym "FPIC" may not be used in every paragraph, the law is built on this foundation. It demands that any third party (including the government) interference with community forest rights be



subject to the community's free, prior, and informed consent.

Chapter 6 (Sections 6.1–6.4): These sections govern "Commercial Use of Community Forest Resources," requiring that communities must give their consent before any commercial contracts are signed with third-party logging companies

4 **National Wildlife Conservation and Protected Area Management Act (2016)**

Section 2.1 & Chapter 3: This law requires that the establishment of any new protected area must be subject to the FPIC of the communities concerned.

Cooperative Governance: It mandates "cooperative governance" between the state and local communities, ensuring that communities participate in decision-making regarding wildlife and conservation areas on their land

5 **National guidelines on community consultation and Free, Prior, Informed Consent (FPIC) (2019)**

Liberia developed dedicated National FPIC Guidelines in 2019, spearheaded by the Environmental Protection Agency (EPA) and supported under the Liberia Forest Sector Project (LFSP). These guidelines are the most explicit operationalization of FPIC in Liberian policy, providing: A standardized definition of FPIC aligned with international standards; Detailed procedural requirements for obtaining FPIC in the context of forestry and land-based investments; Guidance on culturally appropriate consultation formats and languages; Requirements for documenting community consent decisions.

The National FPIC Guidelines are not yet enacted as legislation but serve as the primary operational reference for FPIC implementation in World Bank-financed forestry projects in Liberia, including LiFE-P.

Good Practice Note for Managing the Risks of Projects Involving Protected and Conserved Areas with Annexes I-XII (FPIC Principles)

The Good Practice Note on Managing the Risks of Projects Involving Protected and Conserved Areas (2025) requires that project activities in and around protected areas including Gola Forest National Park and Lake Piso Multiple Use Reserve be designed and implemented in a manner that ensures the meaningful participation and informed decision-making of affected communities, particularly where changes in access to and use of natural resources within or adjacent to these areas may occur. The project is required to apply the principles underpinning FPIC as good practice ensuring that community engagement is free from coercion or manipulation, conducted prior to and throughout the implementation of activities that may affect communities' resource access and livelihoods, and informed by the timely provision of clear, accessible, and culturally appropriate information on the nature, scope, and potential impacts of proposed activities. These requirements are to be captured and operationalized through the project's Process Framework and Stakeholder Engagement Plan (standalone instrument prepared prior to project appraisal), and grievance mechanisms, which must ensure that communities in and around GFNP and LPMR have meaningful voice in decisions affecting their access to forest resources, and that vulnerable groups including women, forest-dependent households, and minority communities are afforded recognized engagement and mitigation measures proportionate to their exposure to project-related risks.

3.7 Gaps between World Bank ESF and National Legislation

There are some gaps between existing laws of the country and WB ESSs. Gaps between Government of Liberia laws including policies related to environmental and social risk management and suggested gap filing measures are given in Table 6.



Table 6: Gaps between Government of Liberia laws and World Bank ESSs

Scope/Objective	Description of Bank Policy	Main Government of Liberia Laws and Regulation	Gaps Identified	Gap Bridging Actions
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts				
- Identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the ESSs. - To adopt a mitigation hierarchy approach to: ✓ Anticipate and avoid risks and impacts. ✓ Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels. ✓ Once risks and impacts have been minimized or reduced, mitigate; and ✓ Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.	The standard provides guidance on assessing the Project's potential environmental and social risks and impacts and addressing potential impacts through planning and mitigation hierarchy approach.	- EPML (2003) - EPA Liberia Act (2003) - ESIA Revised Procedural Guidelines (2022) - EPA Strategic Plan (2025–2029)	Both the EPML and the 2022 Environmental and Social Impact Assessment/Strategic Environmental Assessment Procedural Guidelines have gaps in adequately addressing social aspects such as labor and working conditions as explicitly outlined in ESS2; The Environmental (and Social) Assessment process does not require the application of the principles of “associated facilities” and “cumulative impacts” EPML/EPA Act/ESIA rules establish EIA/ESMP processes and public participation, but climate risk and NDC alignment are not explicitly required in ESIA scope; implementation and enforcement remain uneven, with environmental courts	Projects in Liberia funded by the World Bank generally implement additional safeguards and procedures to ensure compliance with ESS1: - Apply ESS1 mitigation hierarchy in all subprojects; integrate climate-risk screening, GHG considerations, and resilience measures into screening/ESMPs; strengthen enforcement through EPA-county engagement, compliance audits, and corrective action tracking consistent with ESIA 2022 steps (project brief, disclosure, review) - A GM will be established, run, tracked and monitored by the FDA/PIU at the National and Regional levels. The FDA/PIU will be strengthened to manage E&S risks proportionate to the nature and severity of the risks. The E&S competencies at the FDA/PIU will include recruit (1) one environmental (1) one social (GBV) specialist and a GM Officer. - Assistance/compensation will be provided for the parties



Scope/Objective	Description of Bank Policy	Main Government of Liberia Laws and Regulation	Gaps Identified	Gap Bridging Actions
			and decentralized compliance systems weak or not operational	affected by the government. - Implementing agencies will be fully involved in the project preparatory stage through consultations for them to become abreast with project components, and the roles they will play during implementation. - The capacities of the FDA/PIU and relevant agencies staff on World Bank ESF will also be built at the early stage of project implementation to enable them to collaborate effectively in addressing this gap. - Supervision and monitoring of implementation of the ESMP and the hierarchy of measures figuring in ESS1 should be ensured,
ESS2: Labor and Working Conditions				
- To promote safety and health at work, fair treatment, non-discrimination, and equal opportunity of project workers including vulnerable workers such as women, persons with disabilities, children - To prevent the use of all forms of forced labor and child labor. - To support the principles of	ESS2 promotes fair treatment, non-discrimination, and provision of equal opportunities for workers engaged on projects it supports. It strongly encourages protection of all project workers, including vulnerable groups such as women, persons with disabilities, children (of working age) and migrant workers, contracted workers,	- EPML (2003) - Labor Law of Liberia - Decent Work Act (2015) - National Occupational Health and Safety (OHS) Guidelines (2023)	ESIA/EPML do not detail labor/OHS provisions; Liberia relies on the Decent Work Act (2015), but project-specific worker GMs, Codes of Conduct, and contractor management are not prescribed in environmental procedures	For World Bank-funded projects, supplementary measures may be necessary to align with ESS2 requirements fully: - The project will adopt and enhance the project GM dedicated to labor, which addresses concerns promptly. - An Occupational health and Safety plan and a Labor Management Plan tackling working conditions, occupational health and



Scope/Objective	Description of Bank Policy	Main Government of Liberia Laws and Regulation	Gaps Identified	Gap Bridging Actions
freedom of association and collective bargaining of project workers in a manner consistent with national law. • To provide project workers with accessible means to raise workplace concerns. • OHS Hazard identification and right of employees to remove themselves from such workplaces without being punished.	and primary supply workers, as appropriate. It provides certain requirements that the project must meet in terms of working conditions, protection of the work force (especially the prevention of all forms of forced and child labor), and provision of a grievance mechanism that addresses concerns on the project promptly and uses a transparent process that provides timely feedback to those concerned. Under ESS 2, workplace processes will be put in place for project workers to report work situations that they believe are not safe or healthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent danger to their life or health. Project workers who remove themselves from such situations will not be required to return to work until necessary remedial action to correct the situation has been taken. Project workers will not be retaliated against or otherwise subject to reprisal			safety, child labor, etc., have been developed as part of this report to guide project implementers in managing labor-related issues in addition to Emergency procedures. • Labor Management Procedures (LMP), including workers GM as part of this ESMF has been prepared and annexed to the ESMF prior to appraisal, consulted upon, disclosed and implemented by the Project to meet the requirements of the ESS. • Workers will be sensitized on the LMP and their rights to remove themselves from unsafe workplaces, and the fact that they will not be retaliated against if they do so in line with the LMP/ESS 2 provisions.



Scope/Objective	Description of Bank Policy	Main Government of Liberia Laws and Regulation	Gaps Identified	Gap Bridging Actions
	or negative action for such reporting or removal.			
ESS3 Resource Efficiency and Pollution Prevention and Management				
To achieve the sustainable use of resources, including implementing measures that avoid or reduce pollution resulting from project activities	The ESS3 provides requirements for projects to achieve the sustainable use of resources, including energy, water, and raw materials, as well as implement measures that avoid or reduce pollution resulting from project activities. The standard places specific consideration on hazardous wastes or materials and air emissions (climate pollutants) given that the current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of present and future lives.	• EPML (2003) • EPA Liberia Act (2003) • ESIA Revised Procedural Guidelines (2022) • Draft Water Resources Regulations of Liberia (2024) • Liberia Waste Management and Standards Regulations (2009) • Wetland Regulations (2024)	EPML provides pollution control, permits, and standards, but has limited explicit provisions on resource efficiency (energy/water/materials) and GHG accounting; some standards are incomplete or enforcement is weak. The EPA and the Government of Liberia do not have laws or regulations on water resource use that enable national efforts towards efficient management, storage, utilization, and protection of critical water resources. The mandate for waste management in Liberia is spread across multiple regulatory bodies, leading to overlapping mandates and challenges in effective waste management.	Relevant WB EHS guidelines will be adopted to achieve sustainable use of resources and reduce pollution from the construction, operation, and decommissioning works. These will be specified in ESMPs, and contractors will be required to adopt relevant provisions in their site-specific Environmental Management Plans. A Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.
ESS4 Community Health and Safety				



Scope/Objective	Description of Bank Policy	Main Government of Liberia Laws and Regulation	Gaps Identified	Gap Bridging Actions
- To anticipate and avoid adverse impacts on the health and safety of project affected communities during the project lifecycle from both routine and non-routine circumstances. - To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams. - To ensure that safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.	This standard recognizes that project activities, project equipment and infrastructure increase the exposure of project stakeholder communities to various health, safety and security risks and impacts and thus recommends that projects implement measures that avoid or limit the occurrence of such risks. It provides further requirements or guidelines on managing safety, including the need for projects to undertake safety assessments for each phase of the project, monitor incidents and accidents and prepare regular reports on such monitoring. ESS4 also provides guidance on emergency preparedness and response.	- EPA Liberia Act (2003) - EPML (2003) - ESIA Revised Procedural Guidelines (2022) - New Public Health Law of Liberia (revised - 2022) - National Disaster Management Agency (NDMA) Act (2022) - Rape Law, 2005	Liberia's legal framework lacks targeted mandates explicit assessment and mitigation of project-related health, safety, and security risks. The EPML focuses on environmental impacts, with only tangential health benefits; Liberia lacks standardized protocols for emergencies in development projects, a key ESS4 requirement. Without national guidelines, responses to incidents like chemical spills or floods are ad-hoc and under-resourced; ESS4 requires safeguards to prevent security personnel from intimidating or abusing communities, but Liberia has no such regulations. In projects like logging concessions, private security might restrict access to communal lands without oversight, risking conflict or rights violations;	Anticipated impacts from the project are assessed and mitigated as part of this ESIA/ESMP. Contractors will also be required to adopt requirements stated for health-related issues, including implementation of the proposed occupational and community health and safety plans.\ A standalone Security Management Plan (SMP) will be prepared prior to Appraisal to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities. The project will Prepare a SEA/SH Action Plan and accountability framework, to assess and manage the risks of SEA and SH. Develop site-specific CHS plans (traffic, fire, security, emergency response), hazardous materials management and emergency prep; include SEA/SH action plans and accountability framework and proportionate security risk management in line with ESS4; require contractor HSE training and incident reporting The FDA/PIU shall ensure that: - Projects undertake safety assessments for each phase, - Incidents and accidents are



Scope/Objective	Description of Bank Policy	Main Government of Liberia Laws and Regulation	Gaps Identified	Gap Bridging Actions
			The national framework does not systematically protect groups like women, children, or persons with disabilities from project impacts.	monitored and reported, and regular monitoring reports are prepared. - Incidents and accidents are investigated, and shortcomings are identified and taken into account to avoid such mishaps in the future. - An emergency preparation and response plan are prepared as part of this report and will be implemented.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement				
- Avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives - Avoid forced eviction - Mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost; and (b) assisting displaced persons in their efforts to improve, or at least restore their livelihoods and living standards in real terms, to pre-displacement levels or	- Resettlement activities should be planned and implemented with appropriate disclosure of information, meaningful consultation, and participation of those affected. - Applies to permanent and temporary displacement, listing types of infringements - Applies to land users and owners - Recognizes customary land ownership and the impacts of access restrictions on livelihoods. - Involuntary resettlement will refer to both physical displacement (relocation or	- Land Rights Act (2018) - Liberia Land Authority (LLA) Act and Guidelines - EPML (2003) - ESIA Revised Procedural Guidelines (2022) - Executive Order No. 144 (2025) - New Zoning Law (2024)	- Recognizes private and customary land rights but does not prescribe detailed resettlement planning requirements (RPF/RAP), livelihood restoration, treatment of informal users/squatters, or timing of compensation consistent with ESS5. - LLA procedures (registration, valuation) are strong on tenure	- A Resettlement Framework (RF) has been prepared prior to appraisal and annexed to this ESMF for the project to be adopted. Compensation will be based on full replacement value - All Project Affected Persons (PAPs), regardless of legal status, are included in compensation and assistance schemes. - Resettlement Plans (RPs) must ensure secure tenure at resettlement sites, with legal documentation provided. - Eligibility and entitlement outlined in the RF will be applicable for the Project.



Scope/Objective	Description of Bank Policy	Main Government of Liberia Laws and Regulation	Gaps Identified	Gap Bridging Actions
to levels prevailing prior to the beginning of project implementation, whichever is higher. • Improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure. • Conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant. •	loss of shelter) and economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood) as a result of project-related land acquisition and/or restrictions on land use and will cover those who do not have formal claim to the land that they use or live on. •		administration but do not fully cover ESS5 requirements for inclusion of non-title holders, transitional assistance, or project-level GMs and third-party monitoring	The eligibility criteria based in ESS5 include: (a) Who have formal legal rights to land or assets; (b) Who do not have formal legal rights to land or assets but have a claim to land or assets that is recognized or recognizable under national law; or (c) Who have no recognizable legal right or claim to the land or assets they occupy or use. • When there exist adequate information about the Project locations, scope of investment and the corresponding risks, the Project will prepare, consult with stakeholders, disclose implement and monitor a Resettlement Plan and/or Livelihood Restoration Plan as per the requirement of ESS5, as stated in the RF. • When implementing a project, the most stringent has to be materially consistent with ESS5. If there is a difference or conflict between Liberia national laws and ESS5 regarding land acquisition, resettlement, or compensation, the project must apply the



Scope/Objective	Description of Bank Policy	Main Government of Liberia Laws and Regulation	Gaps Identified	Gap Bridging Actions
				requirements that are most protective of affected people, if they are consistent with ESS5. Establishment of project-level GMs, with clear procedures and transparency
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources				
- To protect and conserve biodiversity and habitats. - To apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity. - To promote the sustainable management of living natural resources. - To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities.	ESS6 promotes the conservation of biodiversity or natural habitats and supports the protection and maintenance of the core ecological functions of natural habitats and the biodiversity they support. It also encourages projects to incorporate into their development, environmental and social strategies that address any major natural habitat issues, including identification of important natural habitat sites, the ecological functions they perform, the degree of threat to the sites, and priorities for conservation.	The National Forestry Reform Law (NFRL, 2006), the National Wildlife Conservation and Protected Area Management Law (NWL, 2012), the National Biodiversity Strategy and Action Plan (NBSAP), the National Forestry Policy and Implementation Strategy (NFPIS, 2012), the Guidelines on the Establishment of Protected Areas (2022), the FDA 10 Core Regulations, the PA Network Strategy, and the Code of Harvesting Practice outline procedures for establishing protected areas, developing forest management plans (that incorporate biodiversity conservation and sustainable resource management principles), reporting on conservation of biodiversity/natural resources, and the management and utilization of timber resources, including provisions for	Limited provisions for applying the mitigation hierarchy or, in particular, compensation. There is no specific regulation on compensation for biodiversity loss, including the lack of information on factors of determination, procedure, valuation, and compensation portfolio, approval of programs to be conducted as offset, etc. The ESIA Procedural Guidelines have gaps regarding restoration measures following the project's completion. While the EPML requires the issuance of environmental bonds, the structure,	Apply ESS6 screening for natural/critical habitats and ecosystem services; adopt avoidance/offset hierarchy; require sustainable sourcing for wood/NTFP value chains and incorporate species protection and invasive species controls into ESMPs The project will take measures to protect and conserve biodiversity and habitats and to meet all requirements specified in the ESS6 given the project's support for activities in Liberia's biodiversity-rich forest landscapes that host endemic and threatened species, the ESMF will include biodiversity-related screening & mitigation measures. Where screening identifies significant biodiversity risks, a BMP will be prepared and implemented. Activities in PA or



Scope/Objective	Description of Bank Policy	Main Government of Liberia Laws and Regulation	Gaps Identified	Gap Bridging Actions
		sustainable harvesting practices and biodiversity protection.	procedure, and mechanism for restoration are silent.	critical habitats will comply with ESS6 requirements and align with national biodiversity strategies and PA management plans.
ESS8 Cultural Heritage				
• To protect cultural heritage from the adverse impacts of project activities and support its preservation. • To address cultural heritage as an integral aspect of sustainable development. • To promote meaningful consultation with stakeholders regarding cultural heritage. • To promote the equitable sharing of benefits from the use of cultural heritage.	This standard sets out general provisions on cultural heritage preservation and recommends protecting cultural heritage from the adverse impacts of project activities. It addresses physical or tangible cultural resources, which are defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Physical cultural resources may be in urban or rural settings, and may be above or below ground, or underwater. It also addresses intangible cultural heritage such as practices, representations, expressions, instruments, objects and cultural spaces that communities recognize as part of their cultural heritage. Projects involving significant	• National Museum Act (1989) • Monuments and Relics Ordinance (1949) • EPML (2003)	Liberia lacks a dedicated, comprehensive law specifically addressing cultural heritage protection in line with international standards such as ESS8. Existing laws provide minimal explicit protection for cultural heritage from the adverse impacts of development projects. Liberia lacks a legal mandate requiring chance find procedures in all contracts involving ground-disturbing activities and nationally standardized protocols detailing the steps to follow when cultural heritage is discovered during project implementation. Legal frameworks focus predominantly on tangible heritage, with insufficient provisions for safeguarding	Stipulations in ESS8 will be strictly adhered to. Adverse impacts on cultural heritage from the project activities will be identified in the ESIA, and provisions will be made to support its preservation through the proposed mitigation measures. All contracts will include a Chance Find Procedure. Contractors shall be instructed about the importance of preserving archeological and cultural heritage, the needed measures and procedures, including the Chance Find Procedure. A Cultural Heritage Management Plan (CHMP), will be prepared as part of the ESMP, in accordance with the guidelines of the ESIAESMF prepared for the Project.



Scope/Objective	Description of Bank Policy	Main Government of Liberia Laws and Regulation	Gaps Identified	Gap Bridging Actions
	excavations, demolition, movement of earth, flooding, or other environmental changes are to take cognizance of this standard in the ESMF.		intangible cultural expressions, knowledge, and practices.	
ESS10 Stakeholder Engagement and Information Disclosure				
- To establish a systematic approach to stakeholder engagement that will help the borrower identify stakeholders and build and maintain a constructive relationship with them as project-affected parties. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance. To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them. - To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible, and appropriate	ESS10 seeks to encourage open and transparent engagement between the borrower and the project stakeholders PAP throughout the project lifecycle. The standard establishes a systematic approach to stakeholder engagement that potentially helps the borrower to identify stakeholders and build and maintain a constructive relationship with them, as well as disclose information on the environmental and social risks and impacts to stakeholders in a timely, understandable, accessible, and appropriate manner and format. It recommends that stakeholder engagements commence as early as possible in the project development process and continue throughout the lifecycle of the Project. This allows for stakeholders' views to be considered in project design and environmental and	- EPML (2003) - ESIA Revised Procedural Guidelines (2022) - Land Rights Act (2018) 2006 National Forestry Reform Law	clear definition and monitoring mechanism of stakeholder engagement and information disclosure. legal mechanism for regulating and monitoring effective stakeholder engagement and information disclosure in all stages of the project cycle. requirement to disclose information in relevant local languages and in a manner accessible and appropriate specific regulations that would ensure that vulnerable groups have access to grievance mechanisms or public consultation.	Aligning with ESS10 would require strengthening stakeholder engagement: - The project shall develop a standalone Stakeholder Engagement Plan (SEP) prior to appraisal that sets a plan for consultations throughout the project lifecycle, with all categories of stakeholders including vulnerable groups. The SEP shall also include a GM based on the existing grievance mechanism for resolving grievances for the project - The GM is a decentralized and transparent system which ensures quick resolution of complaints and disputes; it also has the structure for disclosing vital information to requisite stakeholders. - It also provides a means for effective and inclusive engagement. This instrument which satisfies almost all the requirements of ESS10 will

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Scope/Objective	Description of Bank Policy	Main Government of Liberia Laws and Regulation	Gaps Identified	Gap Bridging Actions
manner and format. To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow the borrower to respond to and manage such grievances.	social performance. The borrower is also expected to implement a grievance mechanism to receive and facilitate resolution of concerns and grievances.			be applied during project implementation to bridge the gaps in national regulations and policies.



3.8 Relevant International Environmental Protocols related to Forest Economy

The LiFE-P will operate within well-established international environmental and social commitments that Liberia has ratified. These treaties and protocols recognize how forests are conserved and used, how legal timber enters trade, how biodiversity and wetlands are protected, and how climate and restoration targets are measured and reported. They also inform the project's safeguards (e.g., critical habitat avoidance, access-restriction mitigation) and its value-chain ambitions (legality assurance, traceability, certification). Below is a concise inventory of the most relevant instruments and why they matter for LiFE-P's design and implementation.

- **EU Forest Law Enforcement, Governance and Trade (FLEGT) Voluntary Partnership Agreement (VPA) (signed 2011, ratified 2014):** Establishes a legality assurance and chain of custody system for timber exports (FLEGT licensing) and supports governance reforms in both export and domestic markets directly relevant to LiberTrace integration, legality verification, and PPP sawmilling, roads and ports infrastructure (under PPP arrangements through pre-feasibility and feasibility studies) investments under LiFE-P.
- **International Tropical Timber Agreement (ITTA):** Promotes sustainable tropical timber trade and sustainable forest management; aligns with LiFE-P's goals to add value domestically while ensuring sustainability in production forests and plantations
- **Extractive Industries Transparency Initiative in Liberia (LEITI):** Although focused on extractives, Liberia's transparency framework intersects with forest revenue and concession disclosure; relevant to LiFE-P's emphasis on transparency and fair benefit sharing in community and PPP arrangements
- **Convention on Biological Diversity (CBD) and Liberia's NBSAP (2017–2025):** Commits Liberia to conserve biodiversity, use it sustainably, and share benefits; operationally relevant to protected area (PA) management effectiveness, community forestry planning, and critical habitat screening under LiFE-P
- **CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora):** Regulates international trade in listed species; affects legal timber species/products and wildlife trade controls, requiring robust traceability and enforcement, key for LiFE-P's legality and community value chain work
- **Convention on the Conservation of Migratory Species of Wild Animals (CMS):** Protects migratory species; informs corridors and landscape planning in LiFE-P's PA and restoration activities
- **World Heritage Convention (UNESCO):** Safeguards cultural and natural heritage; highly pertinent for the Nimba landscape (ENNR/Nimba), requiring careful siting and design of PA/eco-tourism works
- **Ramsar Convention on Wetlands:** Requires wise use of wetlands and effective management of listed sites; relevant where LiFE-P's restoration or buffer zone activities touch riparian zones and mangroves or Ramsar sites
- **Revised African Convention on the Conservation of Nature and Natural Resources (Maputo Convention):** Regional framework reinforcing conservation and sustainable use commitments that underpin LiFE-P's integrated landscape approach
- **UNFCCC and the Paris Agreement (ratified 2018):** Obligations include conserving/enhancing forest carbon sinks, national GHG inventories, and progress toward NDCs; directly frames LiFE-P's restoration targets, woodlot/plantation rehabilitation, and MRV of emissions and removals
- **REDD+ Warsaw Framework and Liberia's REDD+ process (FCPF):** Provides the policy, safeguards, benefit sharing, and MRV architecture for reducing emissions from deforestation/degradation



and enhancing stocks; LiFE-P builds on these to monitor hectares under improved management and carbon outcomes

- **UN Convention to Combat Desertification (UNCCD):** Supports sustainable land management and restoration; directly relevant to LiFE-P's degraded land rehabilitation, erosion control, and watershed measures
- **Stockholm Convention on Persistent Organic Pollutants (POPs):** Requires control and phase out of POPs; relevant for integrated pest management (IPM) in nurseries/agroforestry and safe handling of chemicals in processing operations supported by LiFE-P
- **Cartagena Protocol on Biosafety:** Regulates transboundary movement of living modified organisms; informs any seed/plant material introduction in agroforestry pilots under LiFE-P

3.9 Institutional Framework

Liberia has adequate environmental governance institutions at the national and local government levels.

The following government institutions are associated with the LiFE-P. The role of each institution, with respect to the implementation and monitoring of ESMF, is summarized in table 7.

Table 7: Project Institutional Framework

Institution	Role and Responsibilities
National Institutions	
Ministry of Finance and Development Planning (MFDP)	Leads national development planning and coordinates external financing; through the Project Financial Management Unit (PFMU), provides fiduciary oversight (budgeting, accounting, reporting, disbursement) for World Bank projects—functions directly relevant to LiFE-P's implementation
Forestry Development Authority (FDA)	Oversees sustainable protection, management, and conservation of government-owned forests and wildlife; Manages Liberia's forest estate for commercial, conservation, and community uses; Conducts long- and mid-range planning in forestry.; Develops forestry policy, law, and administration; Regulates commercial use of state forests: grants concessions, enforces legislation, sets fees, reviews investments, and supervises research, training, and timber companies; Administers protected areas and wildlife via the Department of Conservation, including National Parks and Wildlife Divisions.
Environmental Protection Agency (EPA)	To "coordinate, monitor, supervise and consult with relevant stakeholders on all activities in the protection of the environment and sustainable use of natural resources" Has executive authority for all environmental activities and programs relating to environmental management in Liberia Responsible for issuing environmental impact assessment licenses Responsible for compliance monitoring relating to environmental regulations and standards
Ministry of Agriculture (MoA)	Regulates forestry concerning plant quarantine, agroforestry and food crop-related plantations fishery and agriculture sectors Has specific responsibilities for soil conservation Plans, executes, administers, manages and supervises agriculture programs and provides extension services, trains local farmers in improved cultural practices, and supplies farm inputs to enhance food security



Institution	Role and Responsibilities
Ministry of Gender, Children and Social Protection (MGCSP)	Serves as the main central government institution for promoting gender equality and the elimination of all forms of discrimination against women and girls Through its National Gender Policy and National Gender Action Plan, the Ministry seeks to ensure gender equality across the spectrum of the social, economic, political and cultural life of the nation Has a Sexual and Gender-Based Violence Unit mandated to monitor and report on cases of sexual and gender-based violence throughout the country
Ministry of Justice, Sexual and Gender-Based Violence Unit (SGBVU)	Shares information with the Ministry of Justice to recommend cases for prosecution Serves as the secretariat for the Gender-Based Violence Inter-Agency Task Force, which brings together UN, government, and local and international non-governmental organizations (NGOs) to address pressing gender-based violence issues in the country Oversees the prosecution of sexual offenses at Criminal Court “E” and at the regional justice and security hubs
Ministry of Labor (MOL)	Is the central government institution established to advance safe, fair and harmonious workplace practices that are essential to the social and economic wellbeing of citizens and residents. Labor regulation, occupational health and safety (OHS), and Decent Work Act enforcement. Is responsible to set, communicate and enforce workplace standards Develops, coordinates and implements strategies to prevent workplace injuries and illnesses through training and dissemination of health and safety information OHS compliance for nursery/plantation works, sawmilling, roads and ports infrastructure (under PPP arrangements through pre-feasibility and feasibility studies) and processing, and community enterprises; labor management procedures.
Ministry of Health (MoH)	Environmental and occupational health, public health law, WASH in health facilities, and community health; conducts sanitary inspections, water quality surveillance, and pollution control interfaces Community health and safety for project works; water and sanitation standards at park facilities, nurseries, and sawmilling, roads and ports infrastructure (under PPP arrangements through pre-feasibility and feasibility studies); disease vector control in buffer-zone livelihoods.
Liberia Land Authority (LLA)	Controls and manages access to and use of public and government land except for reserves, protected areas, proposed protected areas, and diplomatic missions Keeps the deed registry and land registry systems; establishes standards and regulating survey and mapping services; administers public survey and mapping services, values land and buildings; implements programs in support of property rights, including those of customary land owning communities; and adjudicates disputes arising in the context of systematic land registration Promotes, supports and ensures the development of land use management plans and zoning schemes and their implementation through counties, districts and other local government structures (clans, etc.)
Liberia Wildlife Task Force (LWTF)	Is a newly established collaboration between the FDA (chair), the EPA, the Transnational Crime Unit, the United Nations Office on Drugs and Crimes, the Interpol, the Ministry of Justice, and some NGOs Enforcing Liberia’s Wildlife Conservation and Protected Area Management Law to



Institution	Role and Responsibilities
	protect Liberia's wildlife from illegal activities such as poaching, hunting, pet trade, etc.
Liberia National Police (LNP)	Executes arrests related to environmental and biodiversity offenses (e.g., illegal possession or trade in protected wildlife) and supports joint enforcement operations with FDA/EPA/MoJ
Ministry of Mines and Energy (MME)	Oversee development and regulation of minerals, water and energy resources; grants and regulate licenses (including controls that intersect with forest landscapes), manage water resources, coordinates land surveys, and addresses land rehabilitation in collaboration with MoA and academia.
Ministry of Justice (MoJ)	Prosecutes violations of environmental, forestry, and biodiversity laws, including illegal wildlife trade and related offenses; provides legal support to enforcement actions initiated by FDA/EPA/LNP
Liberia Institute of Statistics and Geo-Information Services (LISGIS)	Serves as a repository and quality assurance hub for national data; in forestry MRV, collaborates with FDA and EPA on forest cover/change data, quality control, and national reporting architecture (e.g., supporting NFI/MRV data systems)
National Climate Change Steering Committee (NCCSC)	High-level coordination body for climate policy and cross-sectoral alignment; part of the national and subnational coordination architecture for REDD+/forest governance referenced in LFSP and related missions—relevant for interagency oversight of LiFE
Liberia Special Economic Zone Authority (LSEZA)	Governs Special Economic Zones under the SEZ Act; its remit intersects with industrial investments and E&S compliance within SEZs. For any LiFE-P-related PPPs sited in or near SEZs, coordination with LSEZA would be needed on permitting and standards
University of Liberia (College of Agriculture and Forestry)	Academic and research partner supporting MoA/FDA on training, research, and land rehabilitation. Curriculum and field research for climate-smart agriculture, agroforestry, nursery and silviculture techniques, and CFMB/extension training.
National Disaster Management Agency (NDMA)	Climate/disaster risk screening for community forestry and protected areas; emergency preparedness for wildfire, floods, and storms.
Ministry of Defense (MoD)	Support for protected area operations in remote/high-risk zones (joint patrol protocols to be defined with FDA/EPA).
Liberia National Fire Service (LNFS)	Wildfire prevention/response capacity for community woodlots, plantation rehabilitation, and protected areas (training, firebreaks, equipment).
National Bureau of Concessions (NBC)	Monitors and evaluates concession agreement compliance Interface on overlaps between community/PA areas and forestry/mining/agri concessions; supports compliance and dispute prevention.
Ministry of Commerce and Industry (MoCI)	Trade and industry oversight; identified among national institutions interacting with environment management frameworks; standards/quality infrastructure functions housed under MoCI in practice. Market access/quality and standards for wood/NTFPs; facilitation of firm registration and formalization for forestpreneurs and PPPs.
Liberia Extractive Industries Transparency Initiative (LEITI)	Statutory body advancing contract and revenue transparency in extractives; LEITI Act referenced among the legal framework relevant to forestry governance



Institution	Role and Responsibilities
Cooperative Development Agency (CDA)	Registers and regulates cooperatives and supports cooperative development. Formation and governance of producer groups/cooperatives for timber/NTFP value chains and market access.
Ministry of Local Government	Local government administration and custodianship over local public properties; oversees county/district authorities and supports local participation in natural resource governance. Convening local authorities for CFMA recognition, grievance redress, land-use planning, and co-management bodies around protected areas.
Sub-National Institutions	
FDA Regional offices	Enforce the National Forestry Law and regulations in the field, control illegal logging, ensure compliance with permits/concessions, and oversee community forestry operations within their jurisdictions Manage and support protected areas and multiple-use reserves, including rangers' deployment, basic infrastructure oversight, and conservation enforcement at site level
EPA County Environment Committees (CEC) with County Environmental Officers	Under the EPA Act, CECs are expected to be established in every County with the appointment of a County Environmental Officer (CEOs) for each County. Duties include Work with line ministries on county environmental and resource management, Include local concerns in county government plans and projects, Raise environmental awareness through education and outreach, Coordinate community projects and issues with the EPA, Set up District Environmental Committees (DECs) for local support., Advise DECs and review their outreach and EPA Act reports, Submit a county environmental report every five years, Create a County Environment Action Plan in line with current laws, Report environmental and resource matters to the EPA, Provide additional reports as requested by the Agency.
EPA-District Environmental Committees (DEC) are staffed with District Environment Officers (DEOs)	DECs are responsible for: Promoting environmental awareness through information sharing and education; Encouraging conservation, restoration, and improvement of natural resources within the district via self-help initiatives; Preserving indigenous knowledge and cultural values related to biodiversity; Monitoring district activities for potential environmental impacts; Reporting significant environmental events to the DEO. No DECs have been appointed or nominated since the EPA was established.
Target County and District levels administration (SOP 1 counties- Gbarpolu, Grand Cape Mount, in the Northwest cluster, and Rivercess, Grand Bassa, Grand Gedeh, and Sinoe in the Central North and Southwest clusters)	Facilitate application of the Environmental Protection and Management Law (EPML) locally-scoping, public consultations, and support to the ESIA/ESMP process led by the EPA, including public hearings and disclosure requirements, and monitoring of permit compliance at the site level, in coordination with central EPA and line agencies. Support operation of accessible, gender-sensitive grievance mechanisms (GMS) at community and district levels and referral to project-level GMS; track and help resolve grievances (e.g., on livelihoods impacts, access restrictions, labor/OHS issues). Work with communities on land boundary demarcation, customary land formalization, and dispute resolution, applying the Land Rights framework and procedures (as operationalized in forest programs) to underpin community forestry and benefit-sharing arrangement
Traditional authorities	Paramount and clan chiefs, elders, and women/youth leaders mediate customary land and resource use, ensure cultural appropriateness of activities, and help prevent or resolve conflicts; they also provide social oversight to community institutions and



Institution	Role and Responsibilities
	facilitate adherence to codes of conduct and OHS norms for local works
Community representation organizations and	Community Assemblies and Community Forest Management Bodies (CFMBs), formed under the CRL, represent customary rights-holders; negotiate and sign Community Forest Management Agreements (CFMAs); prepare and implement forest management plans; and ensure internal accountability and inclusive decision-making (including women and youth representation). Manage benefit-sharing locally, oversee revenue use for community development, and maintain financial/operational transparency to mitigate elite capture risks Partner with NGOs/CSOs for technical assistance on governance, gender inclusion, and rights awareness (including women's land and forest-use rights)

4. Environmental and Social Baseline

This chapter presents the descriptions of the biophysical and socio-economic environment across in Liberia and counties at the sub-national levels. The physical and biological factors considered included climate, topography and geology, soils, hydrology, flora and fauna and socio-economic factors among others.

4.1 General overview of Liberia

The Republic of Liberia is located at latitudes 4°21' N and 8°33' N of the equator and longitudes 11°28'W and 7°32'W. Liberia covers 111,369km², and is located entirely within the humid Upper Guinean Forest Ecosystem in West Africa on the Atlantic Coast. The area of Liberia's Exclusive Economic Zone (EEZ) is 229,700 km², extending 370.4 km (200 nautical mi) seaward from shore (Figure 1).

The country is located along the Atlantic Coast of West Africa, between Sierra Leone, Cote d'Ivoire and Guinea. The territory is divided into 15 administrative counties. The capital, and by far the largest town, is Monrovia, located in Montserrado County, with a population of one million. The rest of the country is mainly agricultural or forested, with other major towns having diverse populations of inhabitants.



Figure 1: Administrative map of Liberia

4.2 Political Administrative Jurisdictions

According to NBSAP (2017–2025), Liberia is divided into a hierarchical arrangement of political jurisdictions consisting of 15 counties (each with a designated county seat), 136 districts arrayed within counties, and numerous clans arrayed within districts. Individual counties comprise from 4-18 districts and varying numbers of clans. The six largest counties are (i) Nimba County (11,551km²); (ii) Lofa County (9,982km²); (iii) Gbarpolu County (9,953km²); (iv) Sinoe County (9,764km²); (v) Bong County (8,754.0km²); and (vi) Grand Bassa County (7,813.67km²). Other counties range in area from 1,880km² (Montserrado County) to 5,663km² (River Cess County) (LISGIS 2010).

4.3 Environmental Baseline

4.3.1 Topography

Liberia is situated in the center of the Upper Guinea Rainforest Region along the West Coast of Africa. This region is one of the most biologically diverse and was originally covered by continuous, dense tropical rainforest, ranging from Guinea, south through to Ghana. Liberia has a predominantly equatorial climate, with three distinct topographical belts. The low coastal belt is about 40 kilometer (km) wide, and constitutes tidal creeks, shallow lagoons, and mangrove marshes. Moving inward, the second belt includes rolling hills that reach elevations of 60–150 meter (m) (200–500 feet) (Figure 1). The third belt, comprises the bulk of Liberia, is marked by abrupt changes of elevation in a series of low mountains and plateaus, which are less densely forested (figure 2).

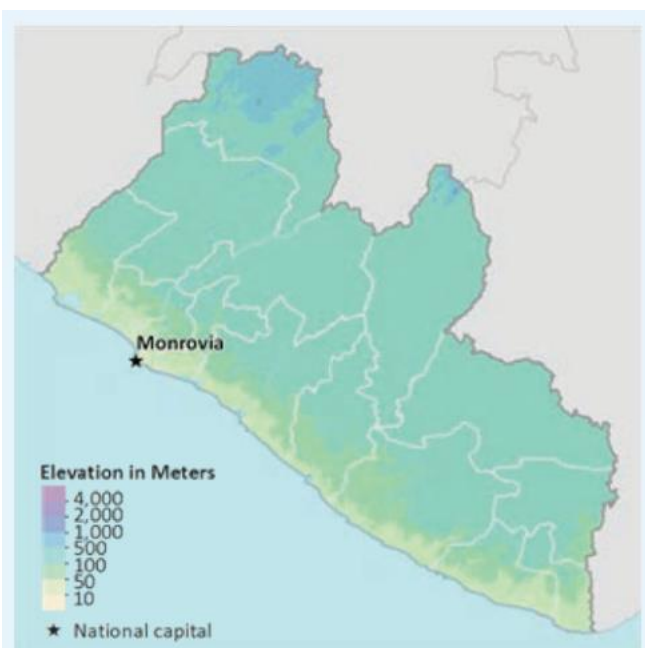


Figure 2: Topography of Liberia (World Bank Group. (2021). Climate risk country profile: Liberia)

4.3.2 Climate

According to the Liberia climate risk country profile, Liberia is one of the wettest countries in the world, with the heaviest rainfall occurring from May to October. The country's average annual rainfall is relatively high, nearly exceeding 2,500 millimeters (mm). Rainfall is highest along the coast, but decreases towards Liberia's interior plateaus and low mountains, where average rainfall reaches approximately 2,030 mm per year.¹² Southern areas of the country receive rain year-round, while the rest of the country experiences two seasons due to the West African Monsoon.¹³ The wet season typically occurs in the summer months between May and November, with average temperatures of 25°C. The dry season typically occurs in the winter months, December to April. The dry season is dominated by the harmattan winds with average temperatures between 24 to 27°C. Relative humidity reaches 90%–100% during the rainy season and 60%–90% during the dry season. Rainfall occurs throughout the year, with peak rainfall occurring from June to September, for the latest climatology, 1991–2020.

The observed seasonal cycle for Liberia over the 1991–2020 climatological baseline, as presented in the WBG Climate Change Knowledge Portal, reflects the country's equatorial tropical climate, which is governed by the alternating influence of moist maritime air masses from the South Atlantic and the dry continental Harmattan wind from the Sahara, mediated by the seasonal migration of the Inter-Tropical Convergence Zone (ITCZ). Mean annual surface air temperature stands at 25.7°C, but the seasonal cycle reveals a clear warm-dry and cool-wet pattern: mean monthly temperatures peak at approximately 26.8°C in March, the height of the dry season when average maximum temperatures reach approximately 32.5°C and average minimum temperatures are around 21.3°C, reflecting long sunshine hours, low cloud cover, and the suppression of evaporative cooling. As the ITCZ migrates northward from May onward and the rainy season intensifies, mean temperatures decline progressively, reaching their annual low of approximately 23.9°C in August, when persistent cloud cover, high humidity, and frequent rainfall depress maximum temperatures to approximately 27.7°C, while minimum temperatures remain relatively stable at around 21.0°C illustrating the narrow diurnal and seasonal range in minimum temperatures that is characteristic of humid tropical climates. Precipitation follows a strongly unimodal seasonal pattern, with mean monthly totals rising sharply from a dry-season minimum of approximately 27 mm in January to a peak of approximately 408 mm in September, with the core rainy season spanning June through October; mean annual precipitation totals approximately 2,467 mm nationally, though with marked spatial variation coastal areas, particularly around Monrovia, receive well over 4,000 mm annually, while the northern interior receives closer to 1,300–2,000 mm. (figure 3).

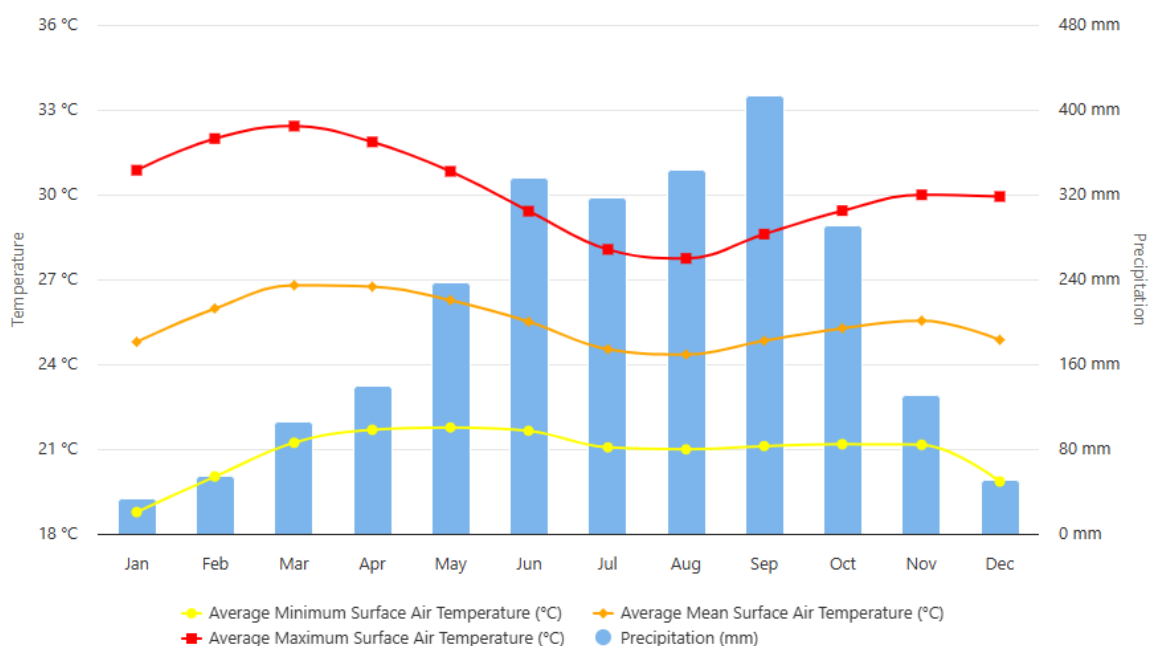


Figure 3: Average Minimum Surface Air Temperature, Average Mean Surface Air Temperature, Average Maximum Surface Air Temperature, Precipitation, 1991–2020 (Source: World Bank Climate Change Knowledge Portal).



4.3.3 Temperature

Liberia's mean annual surface air temperature averaged approximately 25.22°C over the full 1901–2024 period, reflecting the country's consistently warm, humid tropical climate. The time series reveals a clear long-term warming trend, punctuated by notable interannual variability. The coolest year on record was 1976, when the annual average dipped to approximately 24.40°C, while the warmest year was 2016 at approximately 25.96°C a year associated with a strong El Niño event that elevated temperatures across West Africa. Consistent with broader regional climate trends, mean annual temperatures in Liberia increased at an average rate of approximately 0.18°C per decade between 1960 and 2008, representing a cumulative warming of roughly 0.8°C over that period. The warming signal has become more pronounced in recent decades, with the most recent years recording some of the highest temperatures in the entire series: 25.89°C in 2023 and 25.94°C in 2024, approaching the 2016 peak (figure 4).

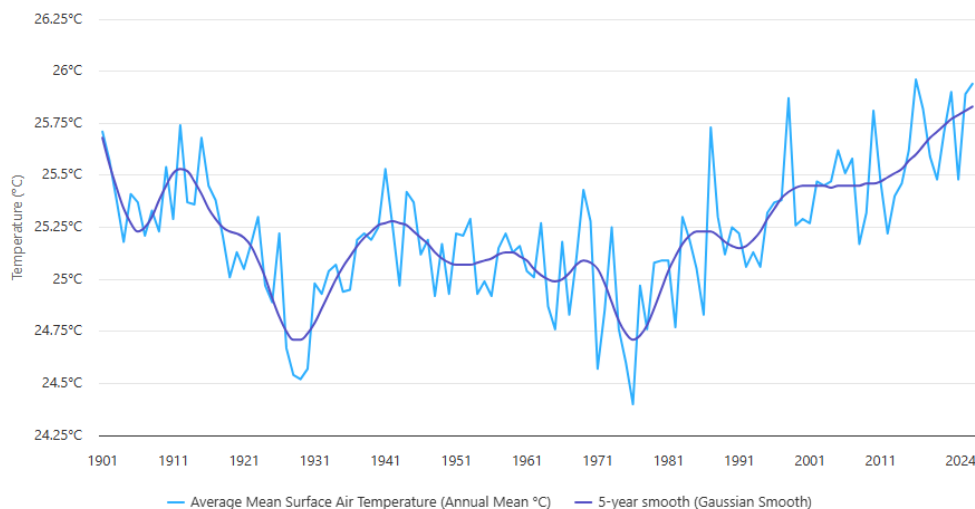


Figure 4: Observed Timeseries of Annual Average Mean Surface Air Temperature in Liberia 1901-2024 (Source: World Bank Climate Change Knowledge Portal)

Climate change is projected to increase temperatures and impact water availability across Liberia; some areas may also experience flooding due to increased intensity of rainfall, coastal erosion and sea-level rise. Liberia as well as the West African Region are at high risk to projected climate trends of increased temperatures, high variability of precipitation with potential for increased heavy rainfall events. Under a high-emission scenario, projections show a likely increase of monthly temperatures of 3.2°C for 2080s, with a possible increase of more than 4.8°C by the end of the century. While mean annual temperatures for the country are expected to increase, warming rates are expected to be higher and more rapid in the northern inland regions as opposed to coastal zones. Under a high emission scenario, it is anticipated that 'hot' days will occur in 24–65% of all days by mid-century and by 29–90% of all days by the end of the century. Most rapid increase will be in July, August and September, however the 'hot season' is expected to start earlier and last later. Hot nights are also expected to increase by 37–89% and 49–95% of all nights for mid and end century, respectively. Temperature rise, as shown in Figure 5 and 6, are projected to increase across all emission scenarios throughout the end of the century. Increased heat and extreme heat conditions will result in significant implications for human and animal health, agriculture, and ecosystems.

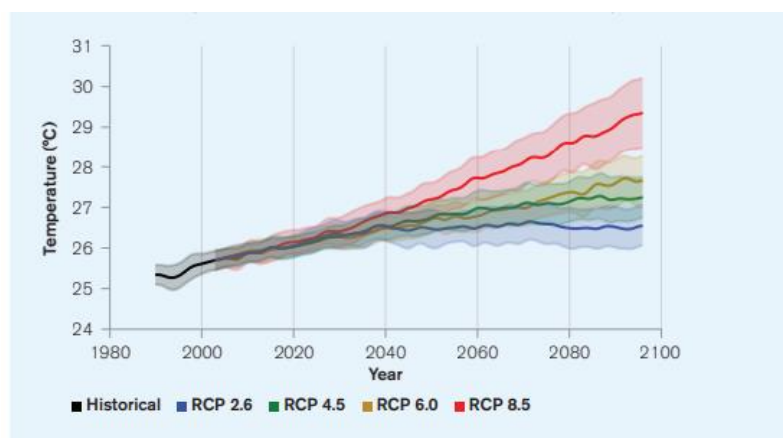


Figure 5: Projected Average Temperature for Liberia (Source: World Bank Group. (2021). Climate risk country profile: Liberia).

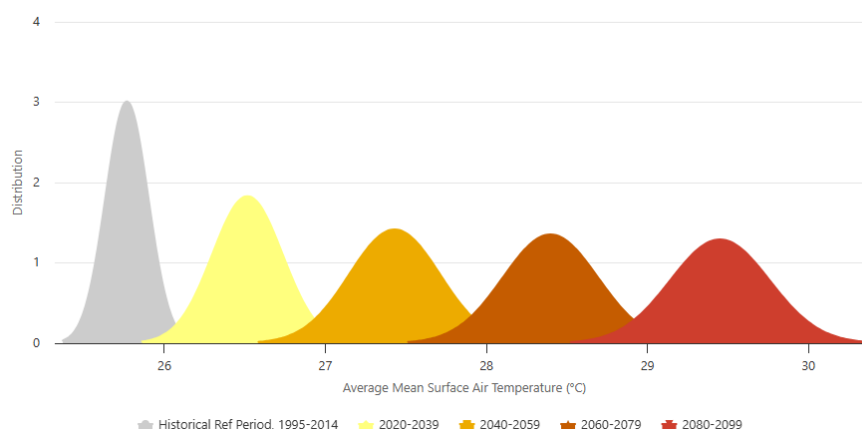


Figure 6: Projected Change in Distribution Average Mean Surface Air Temperature SSP5-8.5 Multi-Model Ensemble (Source: WBG Climate Change Knowledge Portal)

4.3.4 Precipitation

Mean annual rainfall over Liberia has decreased since 1960; however, it remains unclear if this is a long-term trend or due to the variability in rainfall for the region. However increased frequency of intense rainfall is expected, and these event occurrences are also expected to increase in unpredictability. Increasing sea levels may also result in additional vulnerability to coastal areas during heavy rainfall.

The amount and distribution of precipitation is projected to change across the region, with high variability expected for Liberia. Despite significant inter-annual variability, under a high-emission scenario, precipitation at a nationally aggregated is projected to stay largely the same through the 2090s. Despite variability, there is an expected increase in extreme rainfall intensity and an expected reduction in dry season rainfall in the southern regions, by midcentury. Projected changes to variable rainfall will adversely impact Liberia's coastal, forestry and agricultural sectors. This is likely to result in potential flooding for lowland areas, as demonstrated by Figure 7.

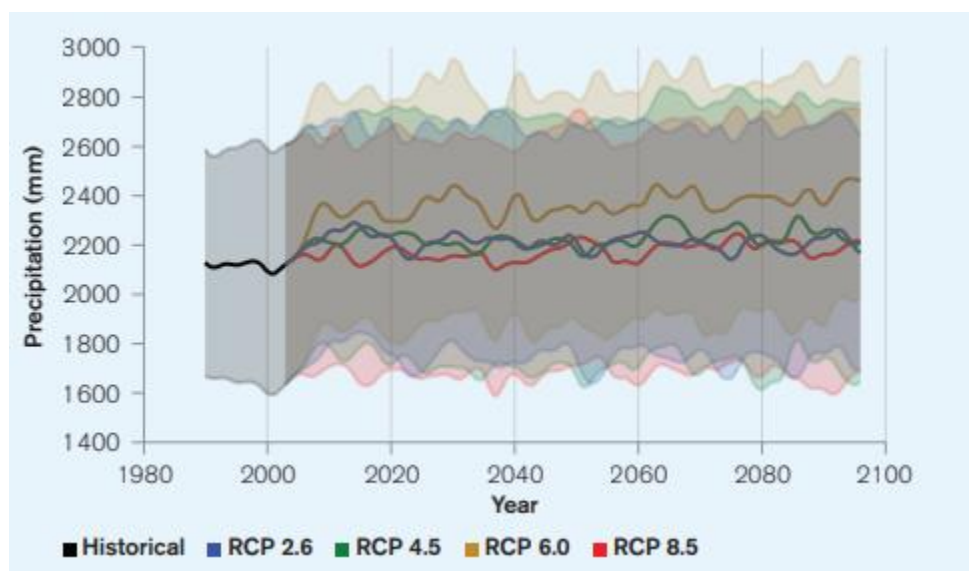


Figure 7: Projected Annual Average Precipitation for Liberia (Reference Period, 1986–2005) (Source: World Bank Group. (2021). Climate risk country profile: Liberia)

4.3.5 Climate Related Natural Hazards

According to the Liberia Country Climate and Development Report (2024), the frequency and severity of natural disasters and hazards such as flooding, heat waves, and disease outbreaks are expected to increase. Increased flooding poses one of the greatest natural hazard risks in Liberia because its many rivers, catchments, and aquifers leave it highly vulnerable to flooding after heavy rainfall. Low-lying coastal zones are especially at risk from the interaction of heavy rainfall events with increased sea level rise and coastal erosion. The higher frequency of extreme heat may also raise the risk of heat stroke and heat-related illnesses; damage to infrastructure, such as power outages (with adverse effects on businesses); wildfires; reduced crop yields; and biodiversity loss. The incidence of waterborne outbreaks, such as cholera and other diarrheal diseases, is also projected to rise. Higher temperatures can also affect the survival, replication, and virulence of waterborne pathogens, and heavy rainfall events can spread pathogens and damage water and sanitation infrastructure. Increased temperatures and precipitation can also lead to more suitable conditions for mosquito-borne disease transmission. Liberia's low baseline of development leaves it highly vulnerable to the impacts of climate change. The physical changes in the environment will present new hazards and strain ecosystems, biodiversity, natural resources, infrastructure, and services, adversely affecting population well-being and livelihoods. Impacts will spill over into economy, affecting private sector development and job creation. The country's current exposure, sensitivity, and capacity to adapt to the negative effects of climate change are of major concern. Figure 8 and 9 shows the Timeseries of Natural Disasters Statistics and the Total Natural Disasters from 1980-2024.

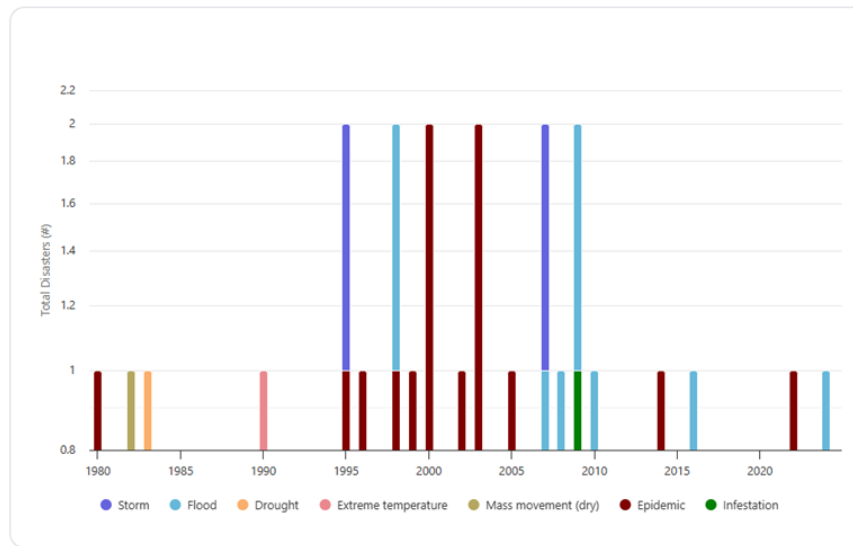


Figure 8: Timeseries of Natural Disasters Statistics (1980-2024) (Source: WBG Climate Change Knowledge Portal)

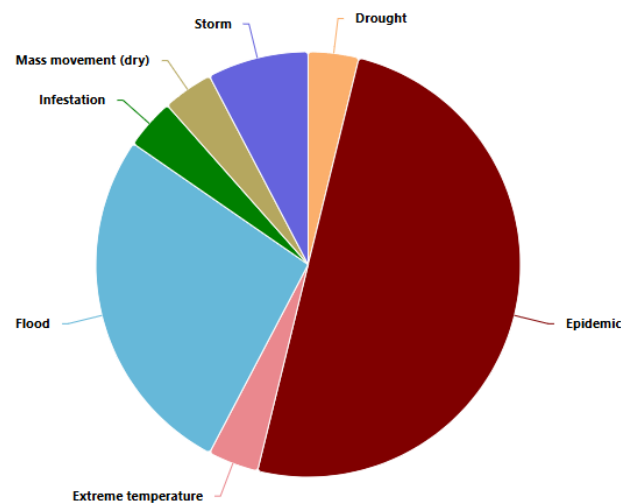


Figure 9: Timeseries of Natural Disasters Statistics (1980-2024) (Source: WBG Climate Change Knowledge Portal)

4.3.6 Disaster Management

Liberia is guided by its National Disaster Management Policy (2012) to ensure the reduction of natural and manmade disaster risks through coordinated efforts across agencies. Liberia is working to reduce vulnerability to climate change by reducing exposures to risk and increasing adaptive capacities and national resilience strategies. Specifically, the country is looking to improve its resilience to increased risk of natural hazards, extreme events, and to reduce vulnerability of local communities and institutions in order to better prepare for, mitigate and respond to natural hazards and increased threats from climate change.



4.4 Overview of Liberia's Forests

Based on the policy note on Harnessing Forests as Pathways to Prosperity in Liberia (2021), Liberia is the most forested country in West Africa, with more than two thirds of its land surface covered by forest. The National Forest Inventory, conducted by the Liberia Forestry Development Authority in 2018 and 2019, estimates the forest cover in Liberia to be 6.69 million hectares which is approximately 69 percent of the total landmass. Forestry is the fourth largest contributor to the Liberian economy, after services, agriculture and fisheries, and mining and panning. The formal (measured) forest contribution to the economy runs between 9-10 percent of gross domestic product. According to the 2020 Global Forest Resources Assessment produced by the Food and Agriculture Organization of the United Nations (FAO), as of 2015, around 39,880 full-time equivalent workers (of which about 35 percent were women) were formally employed by the formal forestry sector

Informal, and largely unmeasured, forest activities provide an important source of jobs and incomes for rural Liberians.

The Formal forestry activities, primarily commercial logging, contribute 10 percent of Liberia's GDP, and informal chainsaw logging accounts for another 3–4 percent (Liberia Country Climate Development Report citing Agyeman and others 2022). Per the 2019 World Bank report, Opportunities for Charcoal and Sustainable Forest Management in Liberia, prepared under the Liberia Forest Sector Project, the charcoal industry is thought to employ up to 28,000 people on a 'full-time equivalent' basis comprising an estimated 14,500 people involved in production, transport and trade as their main occupation, and 23,500 involved on a seasonal or part-time basis. The informal collection and use of non-timber forest products are also important for forest communities. They provide a source of livelihood and food for much of Liberia's rural population. The importance of forest contribution to income generating activities in Liberia is particularly pronounced amongst forest-proximate households (HHs). The majority of these HHs (70 percent) collect forest products for either self-consumption only, or for both sale and self-consumption purposes. In addition, percent use forest products to recover from economic and natural shocks, and two thirds of the HHs that experienced food insecurity relied on forest products to meet their needs during these times.

4.4.1 Forest cover and composition

According to the Liberia Forest Sector Strategy 2025–2029, Liberia's definition of forest is an area of land that has a canopy cover of minimum 30 percent; contains trees with a minimum of five meters height or the capacity to reach it; covers a minimum of 1 hectare of land. [4Cs] Under this definition, Liberia contains about 4.3 million ha of forest. [FDA 2024] With a land area of 9.6 million ha, this corresponds to 45% forest cover, implying that forests are a major land use category in Liberia.

Liberia's forest can be classified as follows:

- Evergreen lowland forests in the southeast and semi-deciduous forests in the northwest.
- mangrove forests along river estuaries along Liberia's coastline (around 11,000 ha)
- Northern savannah: patches of open forest in the far north-western parts of the country and a small portion in the north-east, severely degraded due to continuous burning and clearing for agricultural purposes.
- Forest plantations (approximately 27,000 ha)

According to the Liberia CPF (2025), from 2002-23, Liberia lost 347 kha of humid primary forest, making up 15 percent of its total tree cover loss. Acting as a threat multiplier, climate change is expected to bring hotter temperatures, changes in precipitation patterns, rising sea levels and coastal erosion, and more frequent natural disasters, such as severe flooding and drought. According to the Liberia CCDD, dry/hot



climate conditions could reduce Liberia's potential GDP, pushing an additional 2-6 percent of the population (170,000-330,000 people) into poverty. Adaptation is necessary to reduce climate change-related losses.

4.4.2 Forest management models in Liberia

According to the Liberia Forest Sector Strategy 2025–2029, the following forest management models are described:

- **Forest Management Contracts (FMC):** to be issued to logging companies for an area between 50,000 ha and up to 200,000 ha, with a duration of 25 years. As of 2016, there were seven FMCs with a combined area of 1.0 million ha [NUCFDC] yet none of these is operational anymore. A Forest Management Contract is granted for a 25-year period, with the concessionaire being authorized to cut 1/25th of the area each year and only removing stems over a certain diameter depending on the species. FMC operations must respect such regulations as the Liberian Code of Forest Harvesting Practice (2009); the timber tracing system (LiberTrace); while taxes and fees include the bid fee (once), a land rental fee (annual; per ha), a stumpage fee, and an export fee. The forest law (2006) states that the FDA must make sure that those involved in commercial forestry activities post-performance bonds to secure payment of fees, redress of injuries, compensation of employees, reclamation of land, and return of property.
- Affected communities (those within 3 km distance of the FMCs) are to share in the FMC's benefits, firstly via social agreements that define communities' benefits and access rights, secondly, 30 percent of all land rental fees collected is distributed to affected communities through the National Community Benefit Sharing Trust mechanism. FMC holders are required by forest law (2006) to have business plans that include a strategy for enhancing domestic processing.
- **Community Forest Management Agreements:** In Liberia, a community forest is to be used for the sustainable use of forest products by local communities for non-commercial purposes. However, these forests can be licensed for commercial purposes once communities apply for a community forest management agreement (CFMA) with the FDA, thus becoming an 'authorized forest community'. CFMAs can be issued to authorized forest communities (AFC) for a duration of 15 years for the purpose of community-based forest management for an operational area of less than 50,000 hectares. The communities can use the land for hunting, farming and signing contracts with companies. [4C] As of 2024, there are 57 CFMAs with 1.2 million ha altogether. Of these, 42 signed commercial use contracts (CUCs) with logging companies involving 997,918 ha, and 5 CFMAs are earmarked for conservation involving only 25,367 ha. [NUCFMB] CUCs beyond 50,000 ha up to 250,000 ha shall be subject to the rules and regulations of a Forest Management Contract (FMC). [FDA Regulations to the Community Rights Law of 2009 with respect to Forest Lands] None of the CFMAs has FSC or PEFC certification. Management of the CFMA is to be placed into the hands of a Community Forest Management Body (CFMB), under the supervision of the Executive Committee of the Community Assembly. To support CFMBs in their operations, a national umbrella structure has been created, the National Union of Community Forest Management Bodies.
- **Timber Sales Contracts (TSC)** to be issued to commercial logging companies for conversion of forest areas to other types of land uses within a period of three years.
- **Private Use Permits (PUP)** allow the harvesting of wood on private land, with the consent of the landowner. These are no longer issued due to their misuse in previous years.



- **Protected areas:** the National Forestry Reform Law (2006) defines ten categories of protected areas that together should form a biologically representative network of protected forest areas connected via corridors. Including: (1) national forests; (2) national parks; (3) nature reserves; (4) strict nature reserves; (5) game reserves; (6) controlled hunting areas; (7) communal forests; (8) buffer zones; (9) conservation corridors; and (10) biodiversity protection areas. Liberia has 3 national parks (364,662 ha), one strict nature reserve (13,569 ha) and one sustainable multiple use reserve (97,159 ha) together 475,390 ha [4C] of which an estimated 198,000 ha is covered with forest
- **Unclassified forests:** the above-mentioned forest management categories together hold around 2.2 million ha of forest. Assuming a total of 4.3 million ha of permanent forest land, this implies a remaining area of unclassified forest land of 2.1 million ha or about half of total forest land.

4.4.3 Forests and Livelihoods

According to the Liberia CPF (2025), forests play an important role as a safety net for vulnerable and marginalized people, especially those living around forest areas. As of 2015, around 39,880 full time equivalent workers (of which about 35 percent women) were formally employed by the forestry sector.

The six counties targeted by LiFE-P namely Gbarpolu, Grand Cape Mount, Rivercess, Grand Bassa, Grand Gedeh, and Sinoe collectively constitute two of the three target forest landscapes identified under the preceding LFSP: the Northwest (Gbarpolu, Grand Cape Mount,) and the Central North and Southeast (Rivercess, Grand Bassa, Grand Gedeh, Sinoe) (LFSP ESMF, 2016). These counties hold some of Liberia's most significant remaining forest cover, ranging from 86 percent of land area in Grand Bassa to as high as 99 percent in Grand Gedeh and 98 percent in both Gbarpolu and River Gee (World Bank. 2013. Assessment of Key Governance Issues for REDD+ Implementation in Liberia). In the Western Cluster counties (Gbarpolu, Grand Cape Mount), forest products contribute approximately 27 percent of total household income in forest-dependent communities, with dominant activities including farming, hunting, NTFP collection, pit sawing, and charcoal production (World Bank. 2020. People and Forest Interface: Contribution of Liberia's Forests to Household Incomes, Subsistence, and Resilience). In Gbarpolu, specifically, rice production, animal rearing, and tree crop cultivation alongside artisanal chainsaw milling are the primary forest-linked livelihoods recommended by the communities (LSFP, PF, 2016). In the Eastern Cluster (Grand Gedeh, Sinoe, Rivercess), forest products contribute approximately 32 percent of total household income, with timber extraction, NTFP harvesting (fruits, nuts, honey, medicinal plants, rattan), bushmeat, and fishing serving as critical livelihood pillars. World Bank. 2020. People and Forest Interface: Contribution of Liberia's Forests to Household Incomes, Subsistence, and Resilience). Industrial-scale timber production has historically concentrated in these landscapes, the southeast (Grand Bassa, Rivercess, Grand Gedeh, Sinoe) and northwest (Gbarpolu,) encompass the two main timber production regions in Liberia though severe governance failures, illegal logging, and the absence of benefit-sharing prior to 2003 have left communities with limited economic gains from commercial forestry (World Bank. 2013. Assessment of Key Governance Issues for REDD+ Implementation in Liberia). Grand Gedeh is experiencing particularly acute deforestation pressure, driven by cacao cultivation expansion, with community forests in the county facing increasing illegal encroachment (Global Forest Watch. 2020–2025 County-level Forest cover data for Liberia).

Clusters/16	Counties
Western Cluster	Bomi
	Gbarpolu
	Grand Cape Mount
	Lofa
Central Cluster	Bong
	Grand Bassa
	Margibi
	Rural parts of Montserrado
	Nimba
Eastern Cluster	Grand Gedeh
	Grand Kru
	Maryland
	River Cess
	River Gee
	Sinoe

Figure 10: Forest Cover in the Three Clusters (Source: People and Forests Interface: Contribution of Liberia's Forests to Household Incomes, Subsistence, and Resilience (2020)

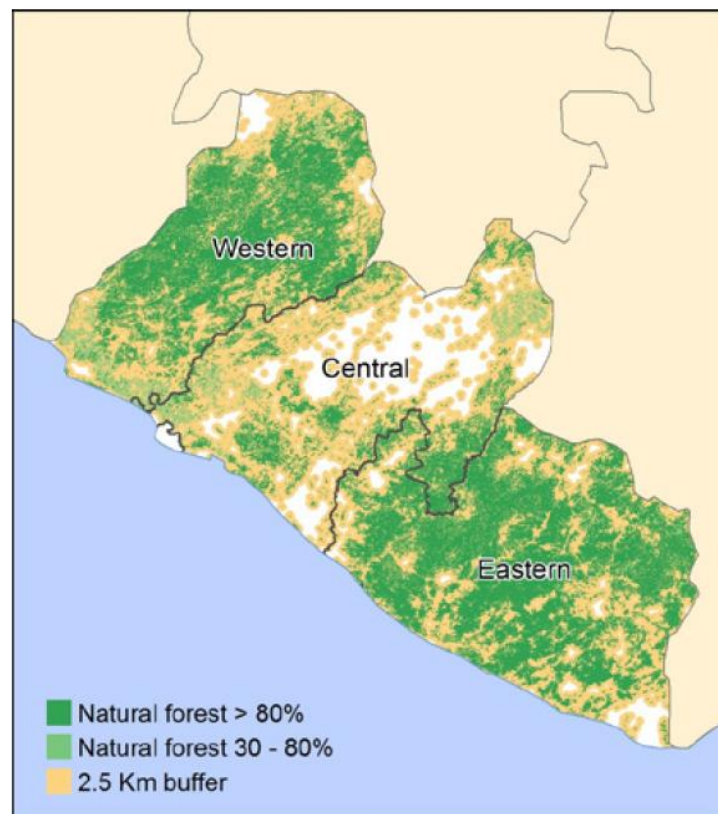


Figure 11: Liberia NHFS Forest Cover in the Three Clusters (Source: According to the People and Forests Interface: Contribution of Liberia's Forests to Household Incomes, Subsistence, and Resilience (2020)



4.4.4 Value-adding activities in agribusiness

The six project counties are generally characterized by subsistence-dominated agriculture, but underdeveloped value-adding agribusiness capacity tied closely to forest and tree crop systems. According to the Liberia Rural Economic Transformation Project: Stakeholder Engagement Plan and Resettlement Framework 2021/2022, tree crops particularly rubber, cocoa, oil palm, and coffee represent the primary cash-generating agricultural activities across all six counties, with rubber alone accounting for approximately 65 percent of Liberia's total export earnings and engaging roughly 49,000 smallholder households nationally. In Gbarpolu, the dominant tree crop and forest-compatible activities include rubber tapping, cocoa growing, oil palm collection, NTFP processing (drying, aggregation, and packaging of forest products), and small-scale fishery along the coast (Grand Cape Mount) (LFSP PF, 2016). In Grand Bassa, Rivercess, and Grand Gedeh, value-adding opportunities are concentrated in timber processing (the Gheegbarhn Community Forest in Grand Bassa is already engaging in sustainable logging operations), NTFP trade, bushmeat substitution through small livestock and aquaculture, and rubber and oil palm outgrower schemes. However, poor road infrastructure across all six counties severely constrains market access and value-chain integration, farmers are typically forced to sell in local markets during the May–September rainy season when rural access is most restricted. Women, who comprise approximately 60 percent of the rural agricultural labor force and carry out 80 percent of agricultural activities throughout the planting season, remain structurally excluded from higher-value segments of agribusiness value chains due to limited land ownership, restricted credit access, and cultural norms.

4.4.5 Deforestation and forest degradation

Deforestation and forest degradation can reduce a forest's capacity to absorb and store carbon, threatening the forests' carbon sink capabilities. The annual rate of removal of forest cover in Liberia rose between 2001 and 2014 (Figure 11). Deforestation has been driven primarily by logging (often illegal), high demand for charcoal, and widespread use of firewood for heating and cooking. Farming, road development, urbanization, and mining are other important drivers of forest loss (FDA 2021). Sustainable forest management will be key to establishing low-carbon growth and increasing the country's competitiveness in accessing carbon markets.

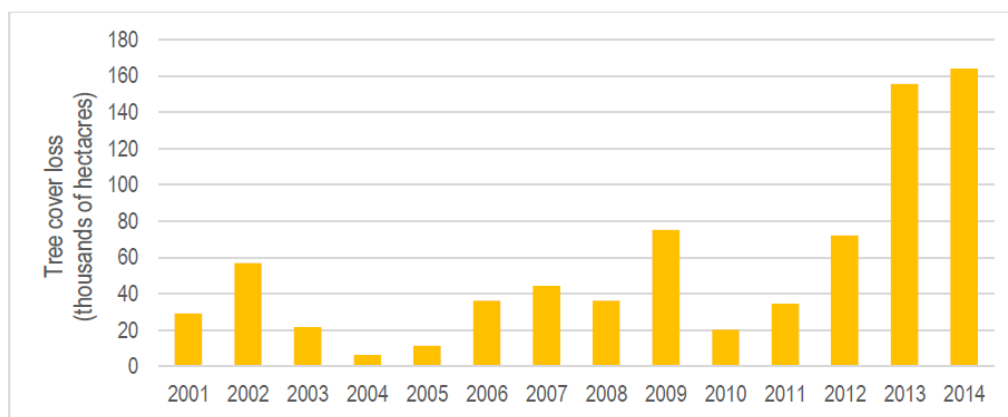


Figure 12: Loss of tree cover in Liberia, 2001–14

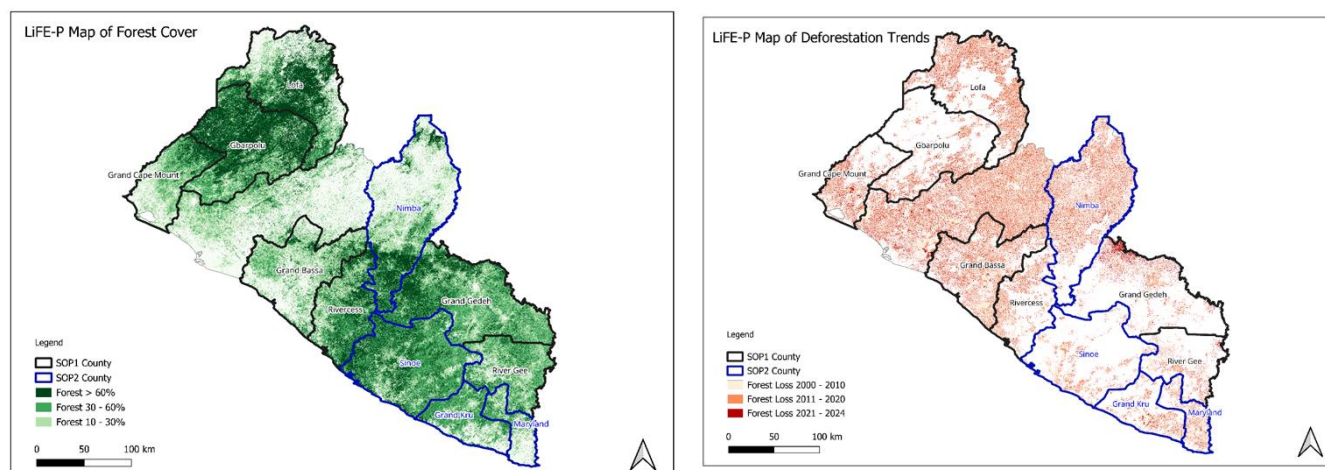


Figure 13: Forest Cover and Deforestation Trends in Liberia

4.4.6 Carbon Sinks

The CCDR (2024), notes that Liberia hosts more than 40 percent of the Upper Guinean Forests and other rainforest ecoregions that harbor biodiversity hotspots for endemic and endangered species, including over 2,000 flowering plants, 600 bird species, 150 mammals, and 75 reptiles (EPA 2017). Liberia's largely intact forests also serve as effective carbon sinks that reduce emissions. The northeast and southern regions contain the largest areas of tree cover and biomass. The ripple effect of such damage would extend well beyond Liberia's borders, destabilizing ecosystems throughout the region and undermining the global fight against climate change (figure 11).

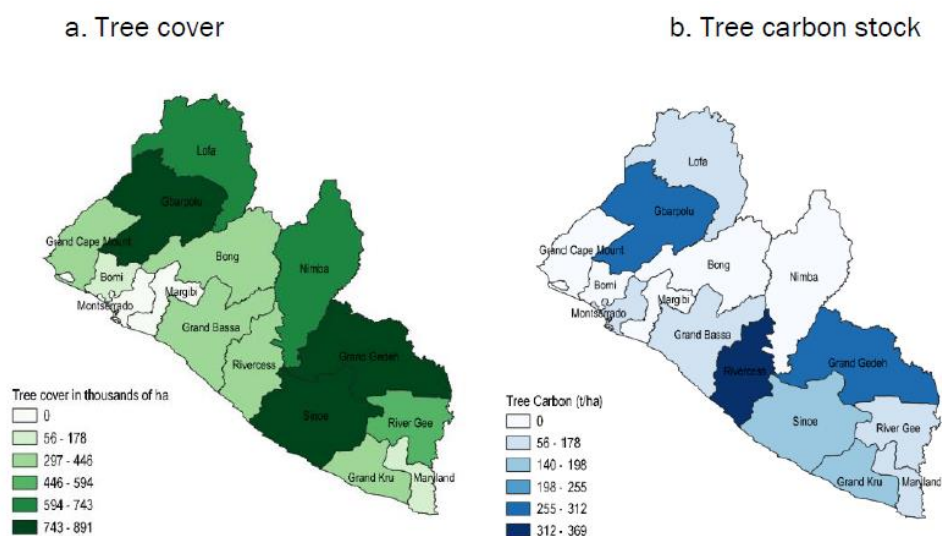


Figure 14: Tree cover and carbon stock in government-defined forested lands by county, 2018/19 (Source Liberia CCDR, 2024)

4.5 Liberia Protected Areas

According to the Sixth National Report of Liberia to the Convention of Biological Diversity (2019), Liberia has a forest area of 4.5 million hectares found in two large forest blocks that contain the forested regions

of the country. The Government of Liberia is committed to the mandate of the National Forestry Reform Law of 2006 to conserve 30 per cent of Liberia's forest. The protected area network of Liberia has grown considerably since its start in 1983 with Sapo National Park. Five protected areas have been established so far and 11 others remained proposed (See figure 15 showing the Protected Areas (PAs), Proposed Protected Areas (PPAs) in Liberia). There are five protected areas in the country; they include: the Sapo National Park, the East Nimba Nature Reserve, the Lake Piso Multiple Use Reserve, the Gola National Forest Park, and the Grebo-Krahn Forest Park. These are located respectively in the southeast, northeast, southwest, northwest, and southeast of the country. The protected areas of Liberia cover in total an area of 4,548 square kilometres, which represents 4.1 % of the country's area.

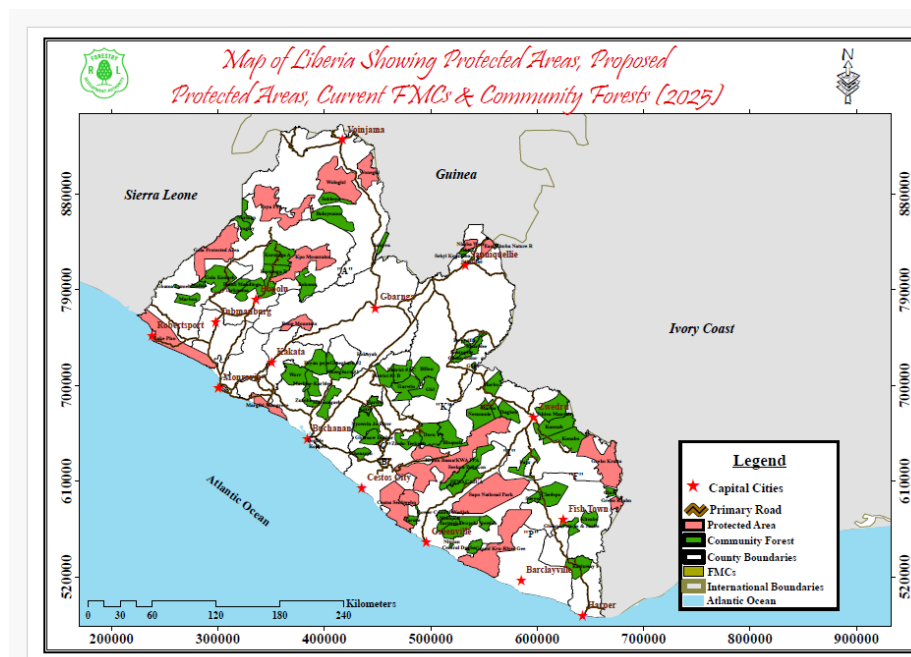


Figure 15: Map of Liberia showing the Protected Areas (PAs), Proposed Protected Areas (PPAs) in Liberia. (Source: FDA, 2025)



The

Protected Areas	Area (Hectares)	Year Gazetted
East Nimba Nature Reserve	13,569	2003
Gola Forest National Park	88,130	2016
Lake Piso Multiple Use Reserve	97,975	2011
Sapo National Park	184,406	1983
Total:	384,080	
Proposed Protected Areas		
Grebo Forest National Park	97,136	Gazetement scheduled for 2016
Wonegizi Nature Reserve	37,979	
Foya Proposed Protected Area	164,628	Gazetement scheduled for 2017
Grand Kru River Gee PPA	135,100	
Cestos/Senkwen Proposed PA	80,348	
Gbi PPA	88,409	Part of Proposed Protected Area Network scheduled for gazetement by 2017
Kpo Mountains (near Zelekai)	83,709	
Bong Mountains (Yoma)	24,813	
Margibi Mangroves "Marshall Islands"	23,813	
West Nimba PPA	10,482	
Total:	746,417	

total

forested landscape covered by protected areas is 384,080 hectares, which is about 8.9% of the total forested area of the country. For proposed protected areas, the estimate is 746,417 hectares or about 17.2% of the total forested area of the country. If the proposed protected areas are declared as protected area, a total of 1,130,497 hectares or 26.1% of the forested area of Liberia would be under protection. Figure 16 shows protected and proposed protected areas in Liberia. In terms of change in forest cover: between 1990 and 2010, Liberia lost an average of 30,000 ha or 0.61% per year. In total, between 1990 and 2010, Liberia lost 12.2% of its forest cover or around 600,000 ha. and Protected Areas: Liberia has some 881 known species of amphibians, birds, mammals and reptiles according to figures from the World Conservation Monitoring Centre. Of these, 0.8% are endemic, meaning they exist in no other country, and 4.2% are threatened. Liberia is home to at least 2200 species of vascular plants, of which 4.7% are endemic. 1.3% of Liberia is protected under IUCN categories I-V.

Figure 16: Protected and proposed protected areas in Liberia (Source: Liberia NBSAP II (2017-2025))

The project will finance activities in and around two (2) Protected Area (PAs). This includes:

1. Gola Forest National Park (GFNP); and
2. Piso Lake Multiple use Reserve (LPMR).

4.5.1 Gola Forest National Park (GFNP) - Grand Cape Mount and Gbarpolu Counties Under the project, activities associated with Gola Forest National Park are associated with component 2. Sub-component 2.1 supports communities in the park's buffer zones through livelihood diversification, CFMA establishment, and conservation agreements to reduce encroachment pressure on the park. Sub-component 2.2 is associated with the restoration of degraded forests and lands in areas surrounding GFNP in Grand Cape Mount and Gbarpolu Counties, including through community woodlot establishment and plantation rehabilitation. Sub-component 2.3 will support the update of the GFNP management plan, procurement of field equipment including vehicles, GPS, and radio equipment, deployment of disruptive technology for wildlife population monitoring, rehabilitation and maintenance of roads and patrol tracks, demarcation of park boundaries to strengthen field presence and enforcement, construction or rehabilitation of staff offices and housing nearer to the park, and preparation of an ecotourism strategy inclusive of revenue-sharing mechanisms. As part of ecotourism preparedness for a potential SOP2, the project will also finance tourism market demand and feasibility assessments, development of a PPP transaction framework covering concession models and revenue-

sharing arrangements, engagement of potential private sector partners, and definition of physical infrastructure specifications including ecolodge footprints and trail networks, alongside the completion of required environmental and social assessments for planned tourism development sites.

Gola Forest National Park is located in northwestern Liberia, along the border with Sierra Leone, and covers approximately 88,000 hectares on the Liberian side. It is Liberia's second formally gazetted national park, officially designated on September 20, 2016, and represents a significant milestone in the expansion of Liberia's protected area network under the government's commitment to conserve 30 percent of remaining forest within protected areas.

The park sits within the broader Gola-Lofa-Mano forest complex, one of the highest regional conservation priorities identified at the 1999 GEF/Conservation International Priority-Setting Workshop for the Upper Guinea Forest Ecosystem. It protects a substantial portion of mixed evergreen and semi-deciduous lowland tropical rainforest the last large remnants of the Upper Guinean Forest, a globally recognized biodiversity hotspot. The park harbors over 49 mammal species, 327 bird species including the critically endangered Liberian Greenbul, 43 amphibian species, and more than 200 tree species. Globally threatened fauna found within the park include the Western Red Colobus monkey, Diana monkey, Zebra Duiker, pygmy hippopotamus, Rufous Fishing-owl, and western chimpanzee. Of particular international significance, Gola Forest National Park forms the Liberian half of the Gola-Tiwai Transboundary Peace Park with Sierra Leone, a cooperative conservation initiative connecting the Liberian park to the Gola Rainforest National Park on the Sierra Leonean side. In 2025, the broader complex was inscribed as a UNESCO World Heritage Site, a landmark recognition of its outstanding universal value. The park is managed by the FDA, and under the predecessor LFSP (P154114), the World Bank supported physical boundary demarcation, construction of park headquarters and ranger outposts, and community engagement around the park's buffer zone. Management challenges remain significant, particularly ensuring adequate recurrent financing for ranger salaries, community livelihood support, and sustained boundary protection (figure 17).

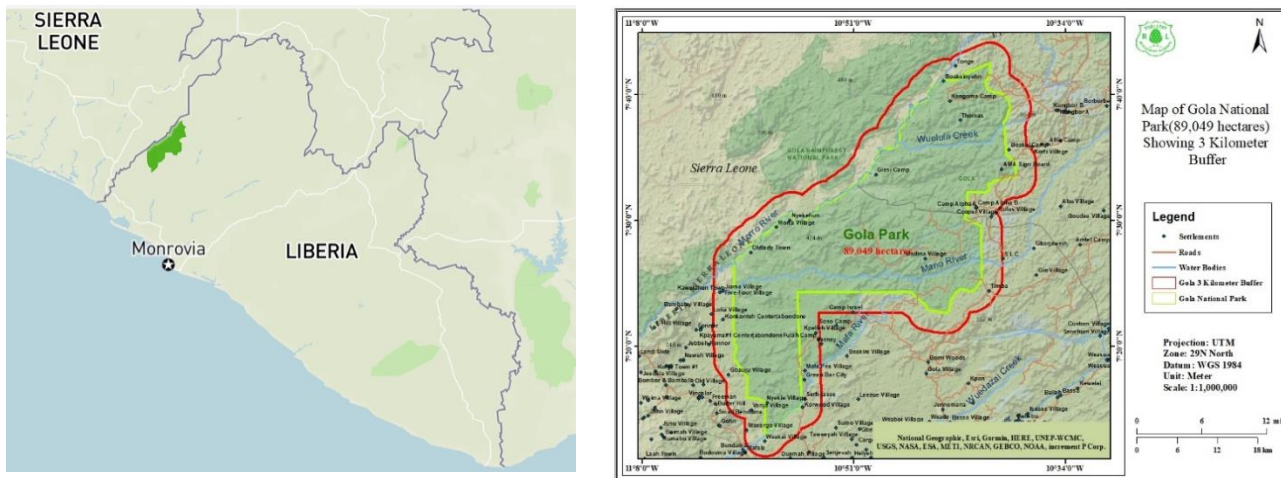


Figure 17: Map of Liberia showing Gola Forest National Park (Source: Protected Planet, 2017 & FDA, 2025)

Biodiversity significance: The Park protects one of the last large intact remnants of the Upper Guinean Forest a globally recognized biodiversity hotspot. It harbors over 49 mammal species, 327 bird species (including the critically endangered Liberian Greenbul), 43 amphibian species, and more than 200 tree species. Globally threatened fauna includes the western chimpanzee, pygmy hippopotamus, Diana



monkey, Zebra duiker, Rufous Fishing-owl, and Western Red Colobus monkey. It is designated as an Important Bird Area by BirdLife International.

The Gola Forest NP buffer zone contains 122 forest-edge communities with an estimated population of approximately 23,500 people, primarily dependent on subsistence agriculture. These communities have historically relied on forest resources within what is now the park for NTFPs, fuelwood, hunting, and farming. The process of park demarcation and boundary reinforcement has generated access restriction impacts

4.5.2 Piso Lake Multiple use Reserve (LPMR)- Grand Cape Mount County

Sub-component 2.1 supports alternative livelihood development for communities in the LPMR buffer zone to reduce pressure on the reserve's ecosystems. Under Sub-component 2.3, The project will support the development of a new participatory management plan for LPMR, alongside procurement of field equipment including vehicles, GPS, and radio equipment, and deployment of monitoring technology. Boundary demarcation, rehabilitation of roads and patrol tracks, and construction or rehabilitation of staff infrastructure to establish a sustained field presence are also planned. An ecotourism strategy with revenue-sharing mechanisms will be prepared for LPMR, and the project will undertake tourism market demand and feasibility assessments to test the viability of a Northwest Circuit concept linking Lake Piso, Blue Lake, and the Gola Forest landscape. This includes definition of product offerings such as kayaking, boat rides, birding, and cultural experiences, development of a PPP transaction and concession framework, identification and preliminary engagement of potential private sector partners, and specification of physical tourism infrastructure requirements all as preparatory outputs to de-risk and inform potential SOP2 investments.

According to the Sixth National Report of Liberia to the Convention of Biological Diversity (2019), Lake Piso Multiple Use Reserve (LPMR) is on the coast in the extreme west of the country lying at a large flat ocean bay with a neighboring large lagoon called Lake Piso. Between Lake Piso and the ocean lies the Cape Mount Peninsula, one of the most beautiful landscapes along the West African coast.

Lake Piso. Designated in 2003 under the Convention on Wetlands (Ramsar Convention) with a size of 76,091 ha, the site is an open coastal lagoon, the largest in Liberia, surrounded by forested hillsides (including one of the rarest tropical rainforests in the West Africa) and fed by a number of creeks and rivers. The site is chiefly a mangrove habitat important both as a nursery and spawning ground for fish and as feeding and roosting places for large numbers of shore and sea birds. The very large stands of mangroves, high fish population and wildlife are valuable natural resources for inhabitants in the area. It is a breeding ground for sea turtles. The site also hosts the vulnerable African dwarf crocodile, the Nile crocodile and the African sharp-nosed crocodile, plays an important role in shoreline stabilization and is also an Important Bird Area (IBA).

Ecological significance: Lake Piso's ecosystem is distinctive within Liberia's protected area network, a coastal wetland and lagoon system that supports western chimpanzees, manatees, pygmy hippopotami, various crocodilian species, and diverse bird populations. It is surrounded by a mosaic of coastal lowland forest, mangrove, swamp forest, and agricultural land. Its hydrological and coastal wetland values distinguish it from Liberia's predominantly inland forest parks.

Approximately 14,000 people in around 120 communities reside within the reserve, all of whom rely on agriculture and fishing primarily artisanal fishing in Lake Piso and its associated waterways as their primary livelihoods. This very high density of resident communities within the reserve boundary makes Lake Piso fundamentally different in management character from Liberia's national parks, where communities live predominantly in buffer zones rather than inside the formal boundary. The communities within the forest zone include: Sembahun, Torsor and Robertspoint (figure 18).

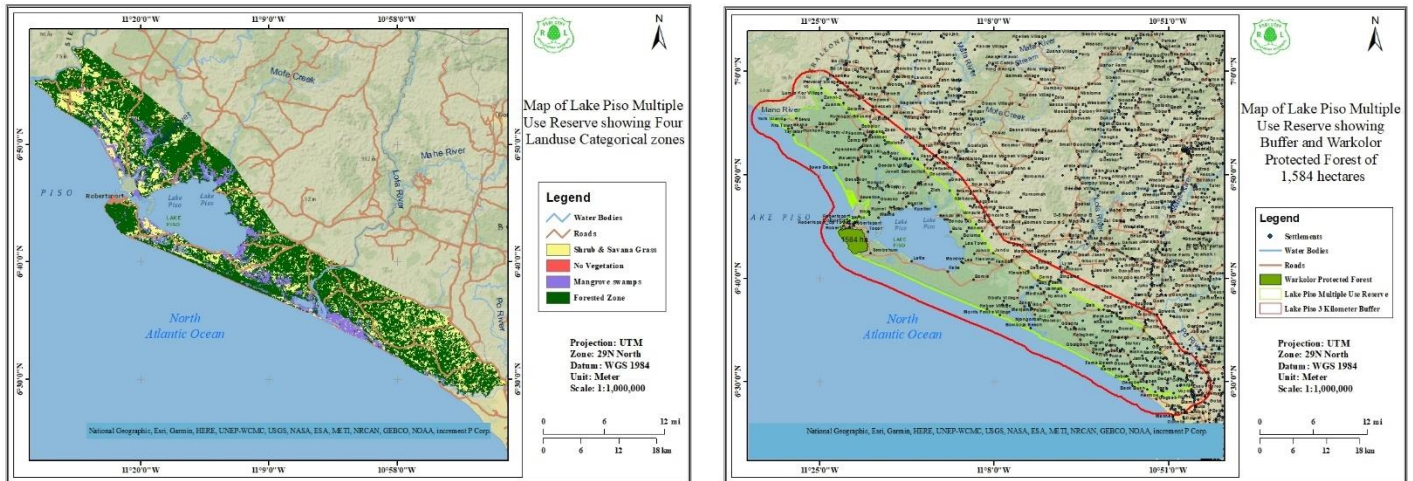


Figure 18: Map of Liberia showing Lake Piso Multiple Sustainable Use Reserve (Source: FDA, 2025)

Community Forest Management Areas (CFMAs) and Bodies (CFMBs) and Forest Management Contracts (FMCs)

CFMAs are formal agreements issued by the FDA to communities under the Community Rights Law (CRL, 2009) and its 2011 Regulations, granting communities the right to access, manage, use, and benefit from forest resources within a designated Community Forest. The Community Forest Management Body (CFMB) is a governance institution comprising a Community Assembly and elected Executive Committee established to manage the CFMA on behalf of the community. There are approximately 57 CFMAs/CFMBs established in Liberia mainly in Nimba, Grand Gedeh, River Gee, Lofa, and Grand Cape Mount Counties. Of these, a subset has entered into third-party commercial use agreements with logging companies. (figure 19)

FMCs are the primary instrument for large-scale commercial timber production in Liberia, granted under the NFRL (2006) and the FDA Ten Core Regulations (2007). FMCs account for approximately 24% of Liberia's total forested area (about 1.7 million ha, including active and proposed FMCs) and 29% of highest canopy cover forest (>80% cover)

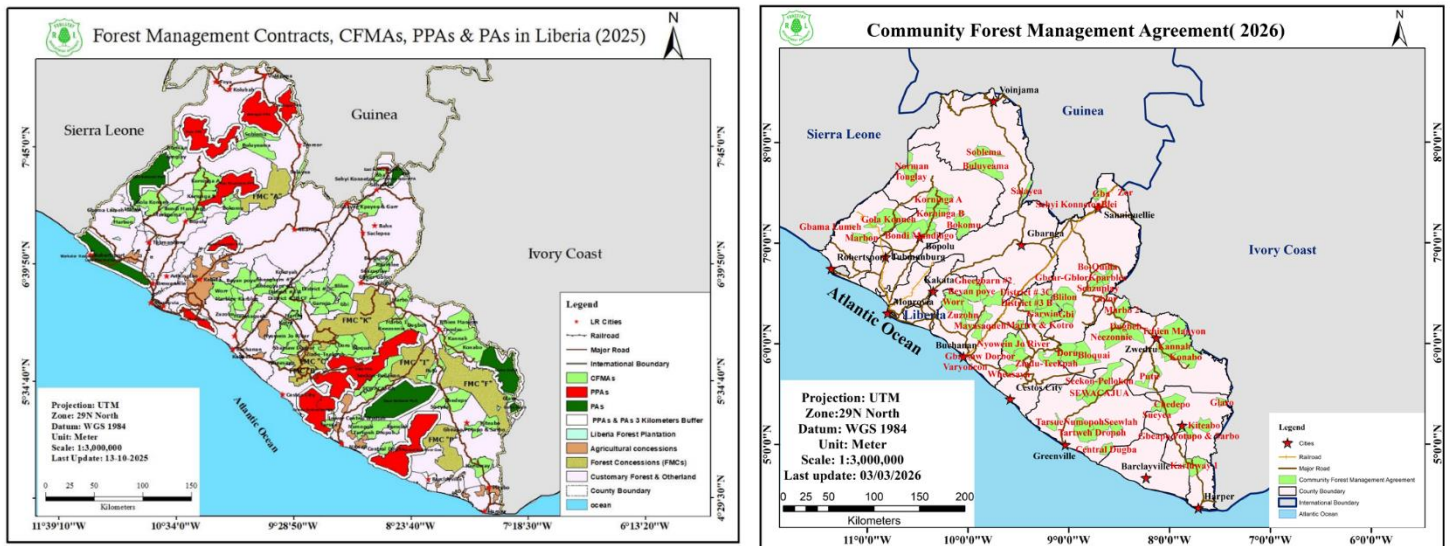


Figure 19: Existing 57 CFMAs/CFMBs in Liberia including PPAs, PAs and FMCs (Source: FDA, 2025)

4.6 Socio-economic Environment

4.6.1 Current spatial distribution of poverty as a percentage of population

Liberia's fifteen counties, displaying the spatial distribution of the share of the population living below the international extreme poverty line of \$1.90 per day. The map draws on data from the 2016 Household Income and Expenditure Survey (HIES) the most recent nationally representative survey available and reveals a pronounced geographic gradient in poverty, with the lightest shading concentrated in Montserrado County, which encompasses the capital Monrovia and records the country's lowest poverty rate at approximately 20.3 percent, reflecting the relative concentration of formal employment, services, and economic activity in the coastal capital region. Moving away from Monrovia, poverty incidence deepens steadily across the interior and southeastern counties, with the darkest shading indicating the highest poverty rates found in Maryland (84.0 percent), Grand Kru (74.4 percent), Bong (71.3 percent), and the broader Southeastern B region (approximately 78.9 percent), counties that are remote, poorly connected by road, and heavily dependent on subsistence agriculture and forest resources. At the national level, nearly 40 percent of Liberia's population lives on less than \$1.90 per day a rate approximately 20 percentage points above the Sub-Saharan African average with rural poverty (71.6 percent) more than double the urban rate (31.5 percent), a disparity that the map makes visually unmistakable (figure 20).

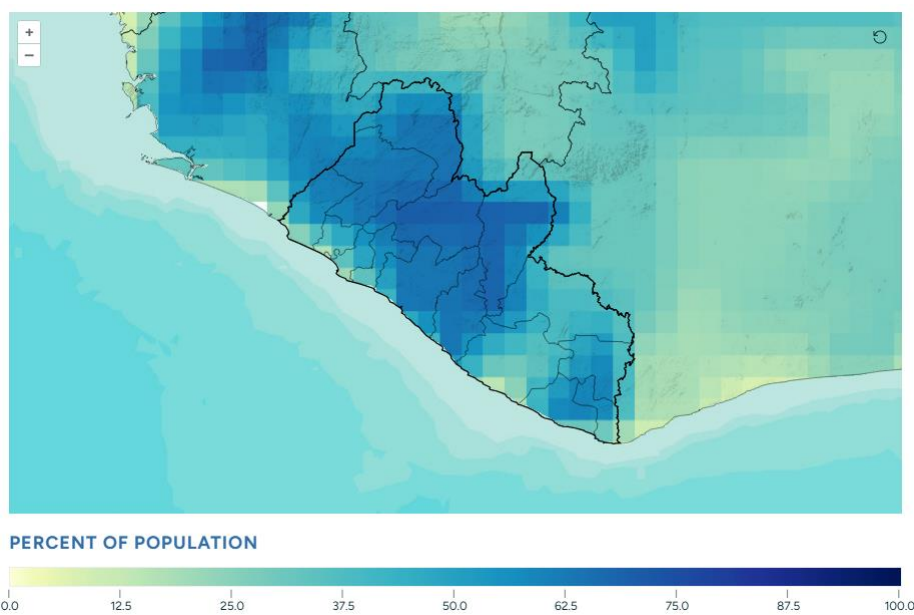


Figure 20: Percentage of Population below \$1.90/day (2020) (Source: WBG Climate Change Knowledge Portal)

4.6.2 Population (National)

According to the Liberia Institute of Statistics and Geo-Information Services (LISGIS) Thematic Report on Population Size, Distribution and Structure (2022), over a period of 60 years, the population of Liberia according to the 2022 PHC has increased more than five times. The population was a little over a million, and by 2022, it has increased to about 5.3 million.

Males constitute 50.4 per cent (2,644,027) and females are 49.6 per cent (2,606,160). The higher number of males than females is reflected in all the censuses except in 1962 where the number female (512,855) is higher than males (503,588). Over a period of 62 years, the population of Liberia has increased by 4,233,744 persons; from 1,016,443 persons in 1962 to 5,250,187 persons in 2022. Between 1962 and 1974, the population of Liberia increased by 47.9 per cent, and it further increased by about 40 per cent between 1974 and 1984. The annual intercensal population growth rate between 2008 and 2022 was 2.8 per cent. The highest population growth rates were of 3.3 and 3.4 recorded between 1962-1974 and 1974 and 1984, respectively (figure 21).

Year of Census	Number			Per cent	
	Total	Male	Female	Male	Female
1962	1,016,443	503,588	512,855	49.5	50.5
1974	1,503,368	759,109	744,259	50.5	49.5
1984	2,101,628	1,063,127	1,038,501	50.6	49.4
2008	3,489,072	1,764,555	1,724,517	50.6	49.4
2022	5,250,187	2,644,027	2,606,160	50.4	49.6

Figure 21: Population by size, 1962–2022 (Source: LISGIS Thematic Report on Population Size, Distribution and Structure (2022))

The Liberia Projected Population by SSP graph from the WBG Climate Change Knowledge Portal presents four diverging demographic trajectories from a common baseline of approximately 5.1–5.2 million people in 2020, extending to 2100 under the Shared Socioeconomic Pathways (SSP1, SSP2, SSP3, and



SSP5). All four scenarios reflect Liberia's current high-growth demographic profile characterized by a total fertility rate of approximately 4.5 children per woman and an annual population growth rate of around 2.55 percent, but they diverge substantially in the medium and long-term depending on assumptions about education, health investment, and socioeconomic development. Figure 22 shows the Projected Population by Shared Socioeconomic Pathways

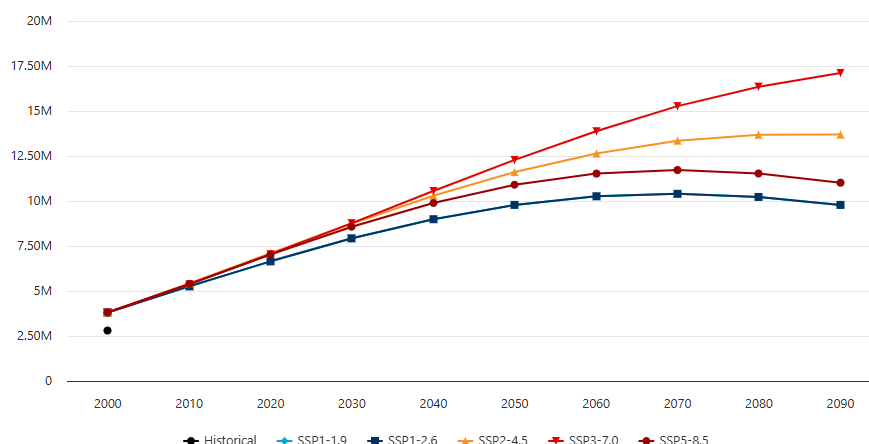


Figure 22: Projected Population by Shared Socioeconomic Pathways (Source: World Bank Climate Change Knowledge Portal)

4.6.4 Population (Sub-Nationals)

Figure 23 provides information on the distribution of the population in the SOP 1 target counties and the changes that have occurred in the population over the years. Liberia's population has more than doubled over the past four decades, rising from 2,101,628 in 1984 to 5,250,187 in 2022, with the national annual growth rate accelerating from 2.1 percent in the 1984–2008 period to 2.8 percent between 2008 and 2022. Among the six LiFE-P target counties, growth trends are notably uneven and carry direct implications for forest resource management. Gbarpolu, which holds some of Liberia's highest remaining forest cover, recorded the lowest annual growth rate suggesting possible out-migration that may reflect limited economic opportunities in the county and could reduce near-term pressure on forest resources but also constrain local labor supply for project activities. By contrast, Grand Gedeh and River Gee, two southeastern forest counties, recorded high and accelerating growth rates of 3.7 percent and 4.2 percent respectively between 2008 and 2022, reflecting in-migration likely driven by agricultural expansion including cacao cultivation. Rivercess remains the least populous county in the country with only 90,819 people as of 2022, suggesting that while forest resource pressure there may be relatively lower, service delivery, and market connectivity may be constrained. Grand Cape Mount and Lofa recorded moderate growth trajectories broadly consistent with the national average, while Grand Bassa, the most economically active of the southeastern counties, continued steady expansion, reinforcing its role as a timber processing and trade hub.



County	Population			Percentage change		Annual growth rate (%)	
	1984	2008	2022	1984-2008	2008-2022	1984-2008	2008-2022
Liberia	2,101,628	3,489,072	5,250,187	66.0	50.5	2.1	2.8
Gbarpolu	48,399	83,758	95,995	73.1	14.6	2.3	0.9
Grand Bassa	159,648	224,839	293,689	40.8	30.6	1.4	1.8
Grand Cape Mount	79,322	129,055	178,867	62.7	38.6	2.0	2.2
Grand Gedeh	63,028	126,146	216,692	100.1	71.8	2.9	3.7
Lofa	199,242	270,114	367,376	35.6	36.0	1.3	2.1
River Cess	37,849	65,862	90,819	74.0	37.9	2.3	2.2
River Gee	39,782	67,318	124,653	69.2	85.2	2.2	4.2

Figure 23: Population distribution in the SOP 1 counties, percentage change and annual growth rates. (Source: LISGIS Thematic Report on Population Size, Distribution and Structure)

4.6.5 Population density

The population, land area, and population density data for Liberia's six LiFE-P target counties across the 1984, 2008, and 2022 census years is presented below. Across all six counties, population density has increased consistently, though at markedly different levels. Grand Bassa emerges as the most densely populated project county at 96 persons per square mile in 2022, followed closely by Lofa (95) and Grand Cape Mount (90), suggesting comparatively higher human pressure on forest landscapes in those counties. Gbarpolu, which holds some of the country's highest remaining forest cover remains sparse at just 26 persons per square mile, the lowest density among the six counties. River Gee's density tripled from 20 in 1984 to 63 in 2022, consistent with the high 4.2 percent annual growth rate recorded in the 2008–2022. Grand Gedeh, the largest county in the group at 4,048 square miles, maintains a comparatively low density of 54 persons per square mile despite strong population growth. Rivercess, the least populous county at 90,819 people and a density of just 29 persons per square mile, remains the most remote and least service-connected of the project counties (figure 23).

County	Population			Area (SQ.M)	Population Density		
	1984	2008	2022		1984	2008	2022
Liberia	2,101,628	3,489,072	5,250,187	37,483	56	93	140
Gbarpolu	48,399	83,758	95,995	3,741	13	22	26
Grand Bassa	159,648	224,839	293,689	3,064	52	73	96
Grand Cape Mount	79,322	129,055	178,867	1,993	40	65	90
Grand Gedeh	63,028	126,146	216,692	4,048	16	31	54
Lofa	199,242	270,114	367,376	3,854	52	70	95
River Cess	37,849	65,862	90,819	2,160	18	30	42
River Gee	39,782	67,318	124,653	1,974	20	34	63

Figure 24: Population, land area and population density by country (SOP 1), 1984 to 2022 (Source: LISGIS Thematic Report on Population Size, Distribution and Structure (2022)).

4.6.6. Urban and rural populations

Figure 24a shows that more than half 54.5 per cent of the country's population live in urban areas. This is the first time a higher proportion of the population live in urban areas. In 1974, the proportion of the urban population was 29.0 per cent in and increased to 38.8 in 1984. In 2008, there was further increase in the urban population to a point of 46.8 per cent. The intensification of the population growth in cities and urban areas is primarily due to rural to urban migration. This trend of movement of the population was most pronounced during the civil war, when limited resources were only available in urban areas, especially in Monrovia (UN Habitat et al, 2017).

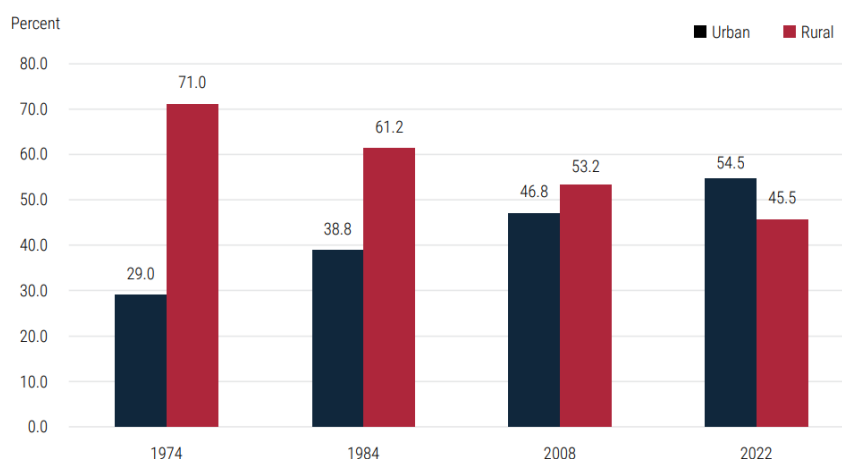


Figure 25a: Urban and rural populations, 1974 to 2022 (Source: LISGIS Thematic Report on Population Size, Distribution and Structure (2022)).

Counties such as Gbarpolu, Rivercess, River Gee, and Grand Gedeh with population densities ranging from 26 to 63 persons per square mile and limited road infrastructure are made up of rural populations with minimal access to urban economic opportunities, making forest resources the primary livelihood safety net. All six LiFE-P target counties Gbarpolu, Rivercess, Grand Gedeh, River Gee, Lofa, and Grand



Bassa exhibit population density profiles and economic structures that are characteristic of predominantly rural counties, with livelihoods anchored in forest agriculture, tree crops, NTFP harvesting, and subsistence farming rather than urban employment (Figure 24b).

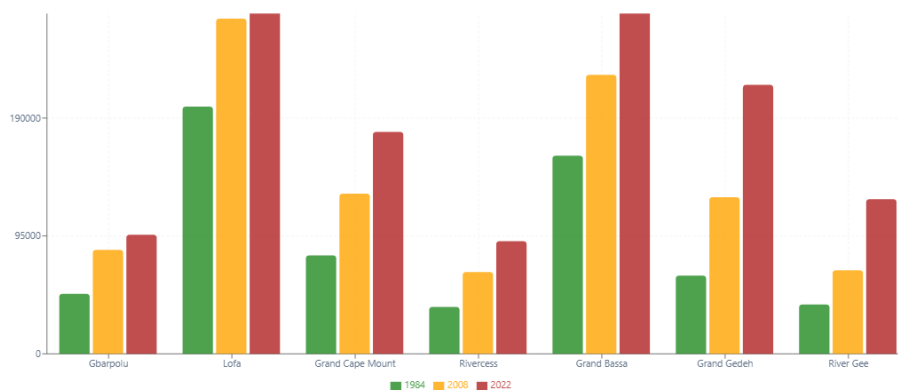


Figure 26b: Urban and rural populations, 1974 to 2022 (Source: LISGIS Thematic Report on Population Size, Distribution and Structure (2022)).

4.6.7 Gender and household main source of fuel for cooking

According to the LISGIS Thematic Report on Gender (2022) In Liberia, the use of wood or charcoal as main source of fuel for cooking is widespread. Across all six LiFE-P target counties, the data reveals dependence on biomass: firewood and charcoal as the primary household cooking fuel, with virtually no meaningful uptake of electricity, cooking gas, or kerosene in any county. Firewood dominates in all counties, peaking at 86.5 percent of total households in Rivercess and 82.3 percent in Lofa, both counties where minimal urbanization and limited market access leave households with no viable energy alternatives which increase pressure on surrounding forest resources. Charcoal adoption is highest in Grand Gedeh (35.3 percent) and Grand Cape Mount (31.4 percent), counties that are experiencing some

of the fastest population growth in the project area, suggesting that urbanizing peri-rural settlements are transitioning from firewood to charcoal rather than to cleaner energy sources. In terms of gender dimension Grand Cape Mount, where female-headed households rely on charcoal are at a rate of 41.4 percent compared to only 27.4 percent for male-headed households. In Lofa, Gbarpolu, and Grand Gedeh, cooking fuel choice is largely consistent regardless of household headship gender, suggesting that in those counties' energy access is constrained by geography and market supply rather than intra-household decision-making dynamics. (Figure 22).

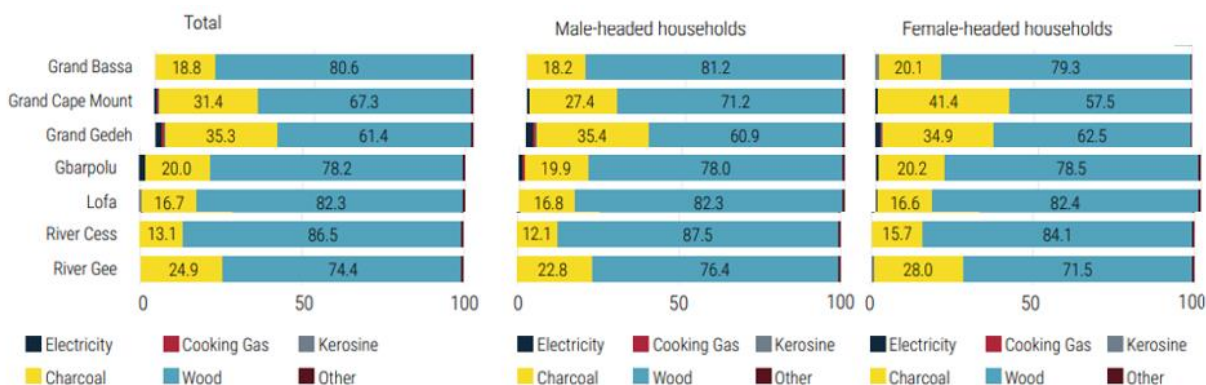


Figure 27: Household's main source of fuel for cooking by sex of household head, type of place of residence and county of residence (LISGIS Thematic Report on Gender (2022)).

4.6.8 Population in agricultural households

Figure 26 shows the population distribution in agricultural households by sex and county. Across all six LiFE-P target counties, the data confirms that agriculture and by extension forest-based farming systems remain the structural backbone of household economies. Lofa is the most agriculturally reliant county by a substantial margin, with 75.0 percent of its 367,376 residents living in agricultural households and recording the largest absolute agricultural population of 275,376 figures that underscore the county's critical importance for forest restoration, CFMA, and sustainable livelihoods investments around Foya and surrounding landscapes. Gbarpolu and Rivercess follow with 54.4 and 56.0 percent respectively, reflecting the high forest-dependence of their small and geographically dispersed populations, while Grand Gedeh at 50.6 percent confirms that more than half its rapidly growing population remains tied to agricultural and forest-based livelihoods. River Gee (44.3 percent), Grand Bassa (42.0 percent), and Grand Cape Mount (33.0 percent) show comparatively lower shares, with Grand Cape Mount's low figure likely attributable to Robertsport's coastal fishing and trade economy. The gender distribution within agricultural households is largely balanced but consistently male-majority in six of the seven counties, ranging from 51.8 percent male in Grand Bassa to 53.5 percent in Grand Cape Mount with Lofa the exception, where women represent a slight majority of 50.3 percent within agricultural households.

Variables	Population in Agricultural Households (%)		Population in Agricultural Households (n)	Population in Agricultural Households (%)	Total Population of Liberia (n)
	Male	Female			
County					
Gbarpolu	52.8	47.2	52,268	54.4	95,995
Grand Bassa	51.8	48.2	123,421	42.0	293,689
Grand Cape Mount	53.5	46.5	59,061	33.0	178,867
Grand Gedeh	53.2	46.8	109,710	50.6	216,692
Lofa	49.7	50.3	275,376	75.0	367,376
River Cess	52.7	47.3	50,817	56.0	90,819
River Gee	52.0	48.0	55,228	44.3	124,653

Figure 28: Distribution of population in agricultural households by sex and county



4.6.9 Labor market dynamics and productivity trends

Liberia's expanding labor force and favorable demographics present an opportunity, but job creation has been concentrated in low-productivity, informal sectors, highlighting the urgent need for better, more productive employment to realize the country's demographic dividend. Liberia's expanding working-age population offers a demographic window of opportunity if job quality improves. The working-age population has expanded steadily, growing at a faster pace than the overall population. According to the 2022 Liberia National Population and Housing Census, more than one-third of the population is under 15 years of age, and the working age population (15–64 years) now accounts for 57 percent of the total, up from 54 percent in 2014, reflecting declining fertility and mortality rates. From 2014 to 2023, the working-age population grew at an annual rate of 2.5 percent. With 84 percent of new working-age individuals entering the labor force, the labor supply increased by an average of 55,000 new entrants per year (Figure 27).

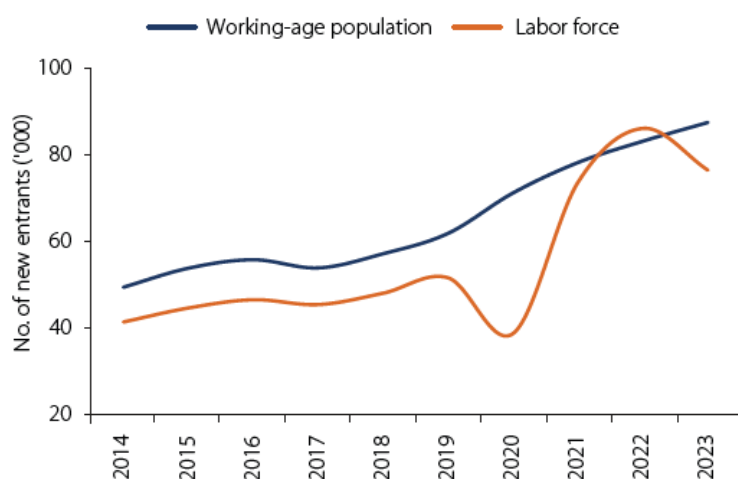


Figure 29: Expanding working-age population has been the primary driver of labor-force growth (Source: Liberia Economic Update (LEU), 6th Edition (2025))

4.6.11 Gender Based Violence (GBV) in Liberia

Although gender-based violence (GBV) is a global problem, recent research in West Africa suggests that this problem becomes particularly acute in post-conflict countries. GBV is one of the most severe and persistent human rights challenges in Liberia, deeply rooted in a history of civil conflict and structural gender inequality. The country ranks among the highest globally in GBV prevalence: according to the 2019–20 Liberia Demographic and Health Survey (LDHS), 61 percent of women aged 15–49 have experienced physical or sexual violence from a husband or partner in their lifetime, and nearly 45.6 percent experienced such violence within the preceding 12 months alone. According to the World Bank's Liberia Gender Landscape (2022), approximately 32 percent of women aged 15–49 have undergone female genital mutilation (FGM), and nearly 25 percent of women aged 20–24 were married before the age of 18 reflecting a declining but still deeply entrenched pattern of gender-based violence and harmful social practices that disproportionately affect women and girls in rural and forest-dependent communities across Liberia..

Among the six target counties, FGM prevalence varies and is heavily concentrated in the western counties: Gbarpolu records one of the highest county-level FGM prevalence rates in the country at 78 percent of women aged 15–49, followed by Grand Cape Mount at 71 percent both counties where the



Sande/Bondo secret society, which traditionally administers FGM initiation, maintains deep institutional presence. (LISGIS and ICF, 2021). River Gee records only 2 percent FGM prevalence, reflecting the different ethnic and cultural composition of the southeastern counties. (LISGIS and ICF, 2021). In Grand Gedeh, while FGM prevalence is low at 12.2 percent, the county records the highest rate of known rape incidents in Liberia according to the UN Response to Rape Group, yet only 12.5 percent of cases were reported to the police. Marital abuse including beating, insult, and harassment is widely practiced and socially normalized in Grand Gedeh, where 46.2 percent of women believe a husband is justified in beating his wife if she argues with him, compared to the national average of 33 percent among women. (LISGIS and ICF, 2013 DHS). In Lofa, Rivercess, and Grand Bassa, county-level GBV data is less systematically documented in available sources, though the ESMF for the Liberia Women Empowerment Project (LWEP) noted an absence of SGBV reporting data for Rivercess and Grand Cape Mount beyond the national aggregates, underscoring the data gap (World Bank, 2022 - ESMF LWEP). Across all six counties, child marriage remains a cross-cutting GBV risk: the 2019–2020 DHS records a national rate of 24.9 percent. (LISGIS and ICF, 2021; World Bank, 2022-Liberia Gender Landscape).

The Government of Liberia has enacted a number of legislative and institutional measures to address GBV, though significant implementation gaps persist. The key instruments include: The Rape Law of 2004, the 2008 Act establishing Criminal Court "E", the Domestic Violence Act (DVA), the National Gender Policy (2009) addresses GBV in its Sections 4.1.6 and 4.1.9, calling for shelters, psychosocial support, rehabilitation of survivors, and strengthening of legal and health-sector responses and a National Action Plan (NAP) on GBV. At the institutional level, the National Inter-Agency Task Force on GBV, chaired by the Ministry of Gender, Children and Social Protection (MGCSP) and co-chaired by the Ministries of Health and Justice, coordinates the government's GBV response in partnership with civil society organizations.

4.6.12 Other Vulnerable Groups

- **Forest-Dependent People/Communities**

Households living within or adjacent to forest areas whose livelihoods depend substantially and, in many cases, entirely on forest resources. The 2018–19 Liberia National Household Forest Survey (NHFS) found that nearly half of Liberia's population lives within 2.5 kilometers of a forest. The six LiFE-P target counties were distributed across all three NHFS regional clusters: Gbarpolu, and Lofa in the Western Cluster; Grand Bassa in the Central Cluster; and Grand Gedeh, Rivercess, and River Gee in the Eastern Cluster all of which record forest cover substantially above the national average, making the near-50-percent national figure a conservative lower bound for these specific counties according to the World Bank. 2021 - Harnessing Forests as Pathways to Prosperity in Liberia: Policy Note. Over one-third of Liberia's total population approximately 1.5 million people lives directly in forested areas, and the six project counties account for a disproportionate share of this population given their forest endowments and rural character (World Bank. 2018. Liberia Country Forest Note). The NHFS further found that forest-proximate households across all three clusters earn an average annual income of just US\$783- substantially below the national household average of US\$2,441 and that approximately 70 percent of these households participate in at least one forestry activity, earning on average 35 percent of their annual income from forest products. [World Bank. 2020. People and Forest Interface: Contribution of Liberia's Forests to Household Incomes, Subsistence, and Resilience & World Bank. 2023. Liberia Country Climate and Development Report). This income dependence is most acute in the Eastern Cluster counties of Grand Gedeh, Rivercess, and River Gee, where forest products contribute approximately 32 percent of total household income and NTFP harvesting, bushmeat, and timber extraction from the primary livelihood base in the near-total absence of alternative economic activity. [World Bank. 2021



Options for Conserving Stable Forests Annex C: Case Studies (Liberia). In the Western Cluster counties of Gbarpolu, Grand Cape Mount, and Lofa, forest products account for approximately 27 percent of household income, with fuelwood, rattan, and bushmeat the most frequently collected products, supplemented by tree crop cultivation and artisanal chainsaw milling. (World Bank. 2021b. Options for Conserving Stable Forests - Annex C: Case Studies (Liberia)).

- **Children and Youth in Forest Communities**

Children and young people in Liberia's forest-proximate communities face compounded vulnerability arising from the intersection of extreme household poverty, limited access to quality education, and early entry into forest labor. Children in these communities are frequently engaged in forest-related labor activities alongside adults collecting fuelwood, assisting with shifting cultivation clearance, processing non-timber forest products which reduces time available for schooling and reinforces intergenerational cycles of poverty and forest dependence.

- **Persons with Disabilities (PWDs)**

People with disabilities in rural Liberia experience significant but often unseen challenges. Around 16–20% of the population lives with disabilities, many caused by past civil wars. In forest communities, they are largely excluded from primary livelihoods like forest labor and from decision-making roles in groups such as CFDCs and CLMDCs. While Liberia's Social Protection Policy (2013) and its ratification of the UN CRPD in 2012 recognize their rights, implementation is very limited and no consistent program exists to ensure inclusion in rural development or forest governance.

Older persons defined in Liberia as those aged 60 years and above in Liberia's forest communities face heightened vulnerability arising from physical limitations, limited traditional social support systems, and absence of formal social protection coverage. More than 55 percent of Liberia's approximately 147,000 people aged 65 and above reside in rural areas, meaning the overwhelming majority are concentrated in counties such as Gbarpolu, Lofa, Rivercess, Grand Gedeh, and River Gee all of which exhibit predominantly rural settlement patterns with minimal access to urban economic opportunities, formal health services, or social protection (LISGIS, 2022). In communities across all six counties, participatory vulnerability assessments consistently identify elderly persons as the second most vulnerable group after persons with disabilities with 15 percent of community-level vulnerability rankings placing elderly persons at acute risk of food insecurity, citing abandonment by children who migrate to urban areas, old-age-related illness, and the inability to perform physically demanding forest and farm labor. (World Bank. 2019. Human Rights and Social Protection Perception Assessment). The prevalence of poor food consumption among elderly-headed households is estimated at 22 percent in rural areas nationally a rate that is likely to be higher in the most remote project counties, particularly Rivercess, where 59.7 percent of households are deprived of access to health facilities, and Gbarpolu, where 72.0 percent of the population lives in multidimensional poverty and 50.6 percent of households lack access to health services. (World Bank, 2011 A Diagnostic of Social Protection; LISGIS, 2022). In Grand Gedeh and River Gee, elderly persons face additional exposure to food insecurity driven by the breakdown of traditional social support networks as younger family members migrate toward agricultural expansion frontiers or peri-urban centers, leaving elderly individuals to manage subsistence plots and forest resource collection without adequate physical capacity (World Bank. 2011. Liberia: A Diagnostic of Social Protection; World Bank. 2025. Liberia Crisis Preparedness Gap Analysis: Technical Annex). A particularly severe vulnerability specific to the western project counties Gbarpolu, Grand Cape Mount, and Lofa is the risk of social exclusion, and in extreme cases physical violence, a pattern rooted in the same traditional belief systems associated with secret society institutions that also perpetuate FGM in these counties (World Bank. 2022. Liberia Gender Landscape).



5. Potential Environmental and Social Risk Impacts and Mitigation Measures

This chapter presents a summary of the potential positive and negative impacts and risks as well as mitigation measures for the planning/design and implementation phases, as well as the project components that have potential environmental and social issues.

5.1 Project Activities with Potential Environmental and Social Risks and Impacts

5.1.1 Potential Positive Impacts

The project is expected to enhance governance, productivity, and climate resilience, while reducing the drivers of deforestation and degradation and will support Liberia's forest sector in Private Capital Enabling for private sector investments in forestry.

5.1.2 Potential Adverse Risks and Impacts The proposed project comprise of geographically dispersed range of activities involving forest governance reform, community-based natural resource management, forest restoration, protected area management, and commercial forestry development. While the project is designed to generate significant environmental and social benefits including reduced deforestation, enhanced community livelihoods, and improved forest governance, several of its activities have the potential to generate adverse environmental and social risks and impacts that require identification, assessment, and management. These risks arise from the direct physical interventions supported by the project, the institutional and regulatory processes to be reformed, and the enabling conditions it is creating for expanded commercial activity in Liberia's forest sector.

Component 1 is focused on institutional reform, governance, and systems development associated with indirect environmental and social risks from enforcement actions, data governance, and the legal and regulatory changes it facilitates. The most significant environmental and social footprints are associated with activities in Components 2 and 3. Component 2, which supports community-based natural resource management, forest restoration, and protected area management, involves large-scale land-based activities including the establishment of community woodlots, rehabilitation of degraded plantations, Reduced Impact Logging within CFMAs, and physical works in and adjacent to globally significant biodiversity landscapes such as Gola Forest National Park and Lake Piso Multiple Use Reserve associated with risks of habitat disturbance, biodiversity loss, soil and water degradation, land tenure conflict, community exclusion, and economic displacement. Component 3, aims to catalyze private investment in commercial forestry and expand processing capacity, involves risks associated with industrial-scale timber extraction, occupational health and safety in processing operations, labor rights in informal and semi-formal value chains, and the social equity implications of market integration and PPP infrastructure development. The following subsections describe these potential adverse risks and impacts in detail, organized by project component.

Environmental Risks and Impacts

The proposed project landscape is ecologically sensitive, with globally significant biodiversity and extensive forest cover, but also faces systemic environmental threats including illegal logging, forest degradation, land use conflicts, and weak governance. The environmental risk is rated High given that the project's planned activities, though aimed at sustainable forest management and improved livelihoods, will be implemented within and adjacent to two protected conservation landscapes, Gola Forest National Park and Lake Piso Multiple Use Reserve. The project's large and geographically dispersed footprint across multiple counties (Gbarpolu and Grand Cape Mount, in the Northwest cluster, and Rivercess, Grand Bassa, Grand Gedeh, and Sinoe in the Central North and Southwest clusters)



increases the potential for cumulative environmental effects. Key risks arise from land restoration and plantation establishment, community woodlot development, NTFP harvesting and commercialization, agricultural livelihood expansion, forest harvesting and Reduced Impact Logging within CFMAs, sawmilling and timber processing, ecotourism infrastructure development and pre-feasibility and feasibility studies for roads, ports, and DBOT sawmill infrastructure under PPP arrangements. The key environmental risks across these activities include habitat disturbance, soil erosion, water pollution, invasive species introduction, overexploitation of forest resources, biodiversity impacts, pollution and waste from processing operations, and fire risk in restored landscapes. Investments in sensitive conservation landscapes have the potential for significant, long-term, and potentially irreversible environmental impacts if appropriate mitigation measures are not identified and effectively implemented.

The geographic spread of subprojects, interventions across Liberia's forest landscapes including Community Forest Management Areas (CFMAs), the Gola Forest National Park, Lake Piso Multiple Use Reserve, and degraded lands for restoration and the cumulative interaction of multiple simultaneous interventions across the same landscape justify the High environmental risk rating.

The following below describe these potential adverse environmental risks and impacts.

Component 1: Forest Governance and Institutional Capacity

- **Monitoring and data system vulnerabilities:** Inadequate cybersecurity protections or system downtime affecting LiberTrace and GIS monitoring platforms could compromise the reliability and continuity of forest cover tracking, creating gaps in oversight that allow illegal logging and forest degradation to go undetected.
- **Access related encroachment risks from infrastructure deployment:** The deployment of vehicles and field equipment to FDA regional offices, while intended to strengthen enforcement capacity, may improve physical access to previously remote forest areas, potentially facilitating encroachment, illegal logging, and agricultural expansion if not accompanied by consistently effective enforcement operations.

Component 2: Sustainable Forest Resource Development

- **Habitat disturbance from land preparation:** Establishment of 3,375 ha of community woodlots and rehabilitation of 9,741 ha of old plantations involves land clearing, soil disturbance, and vegetation removal that can disrupt local ecosystems.
- **Biodiversity loss from species selection:** Introduction of non-native or commercially selected tree species in woodlots and plantations risks displacing native vegetation and reducing biological diversity if species selection is not ecologically planned.
- **Invasive species introduction:** Restoration and plantation activities across degraded lands may introduce invasive plant species that outcompete native flora and alter ecosystem dynamics.
- **Soil erosion and degradation:** Land preparation for restoration, woodlot establishment, and plantation rehabilitation particularly on sloped terrain can accelerate soil erosion, reduce soil fertility, and increase sedimentation in water bodies.
- **Hydrological disruption:** Large-scale tree planting and plantation management can alter local water tables, stream flows, and drainage patterns, particularly in areas bordering wetlands or riparian zones.
- **Forest degradation from Reduced Impact Logging (RIL):** RIL operations may generate soil compaction from machinery, and disturbance to understory vegetation, with cumulative impacts across multiple CFMAs.



- **Secondary encroachment induced by access roads:** Patrol tracks, boundary demarcation, and small-scale infrastructure development in and around CFMAs and protected areas could lead to forest encroachment, illegal logging, and agricultural expansion.
- **Biodiversity risks across the project footprint:** The project will not impact wildlife habitat. Construction of staff offices, housing, and infrastructure rehabilitation near GFNP and LPMR, and eco-tourism development activities, could generate noise, dust, and increased human activity in proximity to sensitive conservation landscapes, potentially creating conditions that alter the ecological integrity of these areas. In addition, the construction activities may pose risks of biodiversity loss which will require mitigation through rigorous impact assessments or Biodiversity Management Plans if needed.
- **Sedimentation of water bodies:** Patrol track rehabilitation near protected areas, as well as plantation and woodlot establishment, can increase surface runoff and sediment loads in rivers, streams, and lake ecosystems including Lake Piso.
- **Fire risk from restoration activities:** Community woodlots and restored degraded lands, particularly in dry-season conditions, present fire risk that could spread into adjacent natural forest if community fire management capacity is insufficient.
- **Unsustainable NTFP harvesting:** Increased market linkages and commercialization of NTFPs under the matching grant mechanism may incentivize over-harvesting of wild plant and animal products beyond sustainable yield thresholds.
- **Waste generation from post-harvest infrastructure:** Community-level storage, drying, and packaging investments generate solid and organic waste that, if unmanaged, can cause localized pollution of soils and water sources.

Component 3: Private Investment and Commercial Forestry

- **Industrial-scale forest extraction risks:** Enterprise readiness and derisking support to MSMEs, including sawmills and chainsaw millers, expands the commercial footprint of timber extraction, increasing the risk of over-harvesting and selective logging of high-value species.
- **Pollution from wood processing operations:** Sawmill operations, kiln drying, and timber processing activities generate wood waste, dust, noise, and effluents that can pollute air, soil, and nearby water bodies if waste management practices are not in place.
- **Habitat conversion from PPP infrastructure:** Feasibility and transaction advisory support for DBOT sawmills, roads, and port infrastructure under the project preparation facility lays the foundation for physical developments that could convert natural land, alter drainage, and fragment habitat in subsequent project phases.
- **Chainsaw milling:** Regulatory and enterprise support to chainsaw millers' risks legitimizing and scaling a practice historically associated with high-grading, selective extraction of commercially valuable species, and residual forest degradation.
- **Chemical and fuel hazards at processing facilities:** Timber processing and equipment operations involve fuels, lubricants, and chemicals that pose spillage and contamination risks to soil and groundwater, particularly at facilities without adequate environmental management infrastructure.
- **Noise and air pollution from SEC rehabilitation:** Rehabilitation of FTI facilities and installation of industry-standard processing equipment generates construction-phase noise, dust, and debris, with operational-phase emissions from sawmilling and drying equipment.
- **Cumulative landscape-level degradation:** The combined expansion of CFMAs, timber plantation, MSME processing, and private investment across the forestry landscape, while individually managed, creates cumulative pressure on forest resources that exceeds the sum of individual activity impacts.



Social Risks and Impacts

The social risk is rated High given that the project's activities will directly engage forest-dependent communities across six counties in Liberia (Gbarpolu and Grand Cape Mount, in the Northwest cluster, and Rivercess, Grand Bassa, Grand Gedeh, and Sinoe in the Central North and Southwest clusters). The project will be operating within a fragile governance context characterized by a legacy of civil conflict, distrust of state institutions, and a history of controversial concessions and inequitable benefit sharing that have generated community grievances and lack of community confidence toward commercial forestry operations, community tensions related to forest governance. Unresolved land tenure disputes, weak community validation processes, and entrenched power imbalances have previously given rise to elite capture, marginalization of vulnerable groups, and the suppression of community voices risks that remain acute where local institutions are weak and governance accountability is limited.

The project involves large-scale community-facing interventions including the establishment and formalization of 20 CFMAs, communal land deed processes, participatory land-use planning, demarcation of protected area boundaries, and strengthened enforcement at GFNP and LPMR which intersect with unresolved land rights, overlapping customary and statutory claims, and existing inter- and intra-community tensions. Key social risks include land acquisition, physical and/or economic displacement and/or restrictions on access to natural resources (e.g., restoration sites, woodlots/plantations, protected area/ecotourism infrastructure, enforcement of protected area rules), land tenure disputes and boundary conflicts, risks of elite capture and exclusion of women and marginalized groups including persons with disabilities, and forest dependent households from governance and benefit-sharing arrangements, economic displacement of communities whose access to forest resources may be restricted by strengthened enforcement before viable alternative livelihoods are in place, elite capture of matching grants and enterprise support, labor rights violations and occupational health and safety risks in commercial forestry and processing operations, gender-based violence and sexual exploitation risks, and inadequate grievance mechanisms. These risks are exacerbated by the scale and geographic dispersion of subprojects with community interface, weak subnational service delivery capacity, FDA's longstanding capacity constraints at both central and field levels, including limited technical staffing, weak interdepartmental coordination, fragile community-government relationships, providing the basis for the High social risk rating.

The GBV/SEA/SH risk for the project is substantial due to a combination of project-specific activity risks and Liberia's broader country context. Liberia has a documented and persistently high prevalence of GBV, from the breakdown of social structures during the civil conflict, established gender inequality, and limited access to justice for survivors. The project involves the deployment of non-local, predominantly male workforces including enforcement personnel, construction workers for infrastructure rehabilitation at GFNP and LPMR, field teams for boundary demarcation and restoration activities, and private sector operators attracted through PPP facilitation into remote, forest-adjacent communities with limited oversight, creating conditions that are drivers of sexual exploitation and harassment. Commercial forestry, sawmilling, timber processing, and enforcement operations are heavily male-dominated environments, exposing women workers, female trainees placed through the SEC internship scheme, and female community members interacting with project actors to heightened risks of sexual harassment and gender-based discrimination. The administration of matching grants, results-based financing, and livelihood subproject funds at the community level further creates power dynamics that can expose women and girls to coercive and transactional relationships, particularly where women's economic dependence on male household members or community leaders is high. These risks are compounded by weak local accountability mechanisms, the normalization of GBV in customary dispute resolution processes, the geographic remoteness of project areas, and the presence of enforcement personnel in



community spaces which reduce the likelihood of reporting and increase the vulnerability of women and girls across the project's area of intervention.

The Project will prepare a draft SEA/SH action plan and accountability framework by appraisal and will finalize and disclose it within 3 months following Project effective date. The Project will ensure dedicated environmental, social, GBV specialists, and a GM Officer within the PIU and implement accessible, SEA/SH responsive grievance mechanisms consistent with ESF requirements.

The following below describe these potential adverse social risks and impacts.

Component 1: Forest Governance and Institutional Capacity

- **Elite capture in concession and revenue management:** Increased transparency of concession agreements and royalty data may be insufficient to prevent politically connected actors from manipulating licensing, concession renewals, and revenue allocation processes, particularly in the absence of independent oversight capacity.
- **Exclusion of communities from regulatory reforms:** Legal and regulatory harmonization processes including policy consultations and drafting of amendments risk being dominated by government and private sector actors, with inadequate representation of forest-dependent communities and women in shaping the rules that govern their resource access.
- **Institutional resistance to governance reform efforts:** FDA staff and external actors who benefit from existing discretionary systems may resist or undermine governance reforms, whistleblower policies, and grievance mechanisms, creating a hostile environment for reform champions within the institution.
- **Enforcement-related community tensions:** Strengthened risk-based enforcement and joint interagency inspections may disproportionately target informal or community-level forest users including chainsaw millers and smallholder farmers rather than large concession holders, generating grievances and perceptions of inequitable enforcement.
- **Data privacy and misuse risks:** Digitization of licensing, permits, and revenue data, and interoperability with government systems, raises risks of unauthorized access to sensitive communities, enterprises, or individual data, with potential for misuse by state or non-state actors.

Component 2: Sustainable Forest Resource Development

- **Land tenure disputes and boundary conflicts:** CFMA demarcation, participatory land-use planning, and delineation of restoration areas can trigger or intensify disputes between communities, between communities and concession holders, and between customary and statutory claimants over overlapping land rights.
- **Exclusion of women from land and governance benefits:** Customary norms frequently restrict women's land ownership and participation in community governance; CFMB formation and communal land deed processes risk reproducing these exclusions leaving women without meaningful control over resources.
- **Intra-community conflict over CFMA benefits:** Clustering of CFMAs and associated business frameworks may concentrate decision-making and financial flows among more powerful community members or CFMB leaders, marginalizing poorer households, minority groups, and those without prior forest governance experience.
- **Economic displacement from protected area enforcement:** Strengthened enforcement at GFNP and LPMR buffer zones may restrict communities' existing access to forest resources including



fuelwood, and medicinal plants constituting economic displacement without physical relocation, particularly before alternative livelihoods are established and functional.

- **Inadequate Free, Prior and Informed Consent (FPIC) processes:** Participatory planning processes for CFMAs, conservation agreements, and protected area management plans may not fully meet FPIC standards, particularly for indigenous and marginalized communities, if facilitated by actors with limited social mobilization capacity or conducted under time pressure.
- **Benefit-sharing failures in CFMAs:** Community Forest management arrangements may fail to deliver equitable benefit sharing including timber revenues, matching grants, and livelihood support particularly for women, youth, the elderly, and persons with disabilities, if CFMB governance is weak or captured.
- **Child labor in community forestry and agriculture:** Livelihood support activities including NTFP harvesting, agroforestry, smallholder agriculture, and snail farming especially when household-based carry risks of child labor, particularly where adult labor is scarce.
- **Exposure to occupational health and safety hazards:** Community members engaged in woodlot establishment, plantation management, RIL operations, and NTFP harvesting face risks from chainsaw use, falling trees, agrochemical exposure, and manual labor in remote areas without access to protective equipment or medical services.
- **Gender-based violence and sexual exploitation risks:** Enforcement activities involving armed personnel, construction works near protected areas, and community cash transfer and grant processes create contexts of elevated GBV and sexual exploitation and harassment (SEH) risk, particularly for women in project areas.
- **Cultural and social disruption from market integration:** Linking communities to formal timber and NTFP value chains and private sector off-takers may accelerate economic differentiation within communities, alter traditional resource governance relationships, and erode customary sharing norms that currently provide social safety nets for the poorest households.
- **Conflict between communities and conservation authorities:** Strengthened enforcement at GFNP and LPMR, combined with boundary demarcation and increased presence of enforcement actors, risks intensifying existing tensions between park management and communities who have historically used these landscapes for subsistence, particularly if alternative livelihoods are delayed.
- **Failure of grievance redress mechanisms to reach vulnerable groups:** Formal grievance channels being established under Sub-component 1.2 may be inaccessible to illiterate, remote, or marginalized community members including women, persons with disabilities, and ethnic minorities due to language, mobility, and literacy barriers.

Component 3: Private Investment and Commercial Forestry

- **Labor rights violations in forestry MSMEs:** Enterprise support and matching grants to MSMEs operating in informal or semi-formal forestry value chains carry risks of non-compliance with labor standards including minimum wage, working hours, occupational safety, and freedom of association particularly in small processing operations and chainsaw milling.
- **Exclusion of women-led enterprises from financing:** Despite stated prioritization of women-led businesses, structural barriers including limited collateral, lower credit scores, weaker business networks, and gender bias among service providers may result in women-owned enterprises being systematically underrepresented in enterprise readiness and results-based financing programs.



- **Youth and graduate employment insecurity:** SEC internship placements and technology startup packages create short-term employment pathways that may not translate into stable, quality jobs, particularly if private sector co-financers withdraw or if the forestry sector remains commercially fragile, leaving graduates in precarious livelihood situations.
- **Community displacement from PPP infrastructure:** Pre-feasibility and feasibility studies for DBOT sawmills, roads, and port infrastructure under the project preparation facility may identify sites that involve displacement of existing land users, setting a pathway for involuntary resettlement or economic displacement in subsequent project phases.
- **Inequitable distribution of private investment benefits:** Catalyzing private investment through PPP models and the IFC Local Champion Program may concentrate economic gains among larger, better-capitalized enterprises and investors, with limited trickle-down to smallholder communities, informal workers, and forest-dependent households who bear the social and environmental costs of expanded commercial activity.
- **Occupational health and safety risks at processing facilities:** Training and equipment support for sawmilling, kiln drying, veneer production, and primary processing at the SEC and within supported MSMEs expose workers to significant OHS hazards including noise, dust, vibration, and machinery accidents in a context where safety standards and enforcement are weak.
- **GBV/SEA/SH risks:** The forestry processing sector is male-dominated; women workers, trainees, and interns placed in sawmills, processing facilities, and concession operations face elevated risks of sexual harassment and gender-based discrimination without explicit workplace conduct standards and reporting mechanisms.
- **Community grievances from private sector conduct:** Private operators attracted through investment promotion and PPP facilitation may not adhere to the social and environmental standards the project is trying to establish, generating community grievances particularly around benefit-sharing, labor practices, and land use.

5.1.3 Cumulative environmental and social risks and impacts

The cumulative environmental and social risks and impacts of the project are a key driver of its high-risk rating. From an environmental perspective, undertaking plantation establishment, community woodlot development, Reduced Impact Logging, NTFP commercialization, sawmilling, and ecotourism infrastructure development (under PPP arrangements through pre-feasibility and feasibility studies) simultaneously within ecologically sensitive landscapes poses significant risks. These include progressive loss and fragmentation of forest cover, depletion of commercially valuable timber and non-timber forest product species beyond sustainable yield levels, increased soil erosion and sedimentation affecting river and lake ecosystems, degradation of critical habitats and ecological corridors linking Gola Forest National Park (GFNP) with adjacent forests, as well as incremental and potentially irreversible biodiversity loss in both GFNP and Lake Piso Lake Multiple Use Reserve (LPMR).

On the social perspective, the concurrent implementation (across 6 counties under SOP 1) of CFMA formalization, land-use planning, boundary demarcation, enforcement enhancement, and market integration in communities facing unresolved land tenure disputes and weak governance structures heightens the risk of land conflicts, exclusion of women and vulnerable groups from governance and benefit-sharing processes, deepening inequality as commercial advantages accrue disproportionately to well-connected actors, and a systematic decline in community trust toward the project and broader forest governance reforms. Furthermore, the combined impacts of workforce influx, cash transfers at the community level, weakened social structures, and ~~the~~ remote nature of the project areas at the county levels may result in a cumulative increase in gender-based violence (GBV). This underscores the



necessity for a coordinated, landscape-level approach to environmental and social monitoring and management throughout the project’s implementation.

5.1.4 Mitigation Measures

The Project design will apply the mitigation hierarchy—avoid, minimize, mitigate, and compensate—to manage environmental and social risks during design, construction, and operation. The ESMF, RF, PF, LMP, SEA/SH plan and accountability framework, IA, SEP and ESCP will guide site-specific environmental and social risk management, supported by independent audits and robust grievance mechanisms.

The project's environmental mitigation framework integrates environmental screening, baseline assessment, and participatory land-use planning across all land-based activities to identify and exclude ecologically sensitive areas including high conservation value forests, riparian buffers, and biodiversity corridors from plantation establishment, woodlot development, and infrastructure siting. Construction Environmental and Social Management Plans will be required for all civil work, with controls on vegetation clearance, sediment management, materials sourcing, and waste disposal. RIL operations will be governed by pre-harvest inventories, felling standards, equipment around watercourses, and post-harvest monitoring of canopy recovery and soil condition. Sustainable harvest and annual NTFP stock monitoring will be enforced to prevent overexploitation, while pollution control measures including dust extraction, effluent management, and wood waste valorization plans will be required for all processing operations. Landscape connectivity will be maintained through riparian buffer standards, ecological reserve areas within plantation zones, and native species planting designs that reduce fragmentation and support ecological movement across the project landscape. The social mitigation framework centers on the application of FPIC-aligned community engagement principles throughout CFMA formalization, boundary demarcation, and protected area management processes, supported by independent facilitators, conflict resolution mechanisms, and legal support for communities engaged in contract negotiations with private sector operators. Transparent, criteria-based subproject and grant selection processes with mandatory inclusion targets for women-led enterprises and vulnerable households, and independent beneficiary verification will reduce elite capture and exclusion risks. A Process Framework will govern the sequencing of resource access restrictions relative to the delivery of alternative livelihoods, ensuring communities are not economically displaced before mitigation measures are in place. GBV risks will be addressed through Worker Codes of Conduct, GBV-specific training for project workers and community members, accessible and confidential reporting mechanisms, and coordinated referral pathways to survivor support services. Grievance mechanisms designed for accessibility across literacy levels, languages, and geographic distances will be operationalized before project activities commence and maintained throughout implementation. OHS mitigation measures will be designed to the specific risk profile of each activity, with RIL and processing operations subject to comprehensive OHS management plans, mandatory certified operator competency requirements, and strict PPE enforcement. Emergency communication equipment trained first aiders and documented medical evacuation procedures will be maintained at all remote work sites, while OHS guidelines will be integrated into community subproject implementation support to ensure that livelihood beneficiaries are equipped to manage occupational health risks associated with their supported activities.

The detailed mitigation measures organized by project phase, activity, responsible party, and indicative budget are captured in the Environmental and Social Risk and Impact Mitigation Table 9 presented in this ESMF. The table covers all phases of project implementation from pre-construction through construction,



operation, and decommissioning phases and addresses environmental, social, and OHS risks and impacts.

5.1.5 Management of Risks Associated with Enforcement and Community Monitoring Actions

Project Context

- Under Sub-component 1.1, the project will support strengthened risk-based enforcement leveraging the existing Wildlife Crime Task Force through updated SOPs, a national risk-targeting model, joint inspection protocols and checklists, joint training for enforcement actors, deployment of logistical and field equipment, and the regular publication of quarterly enforcement reports.
 - *The strengthening of risk-based enforcement through the Wildlife Crime Task Force is focused on building institutional systems, coordination frameworks, and governance protocols including updated SOPs, a national risk-targeting model, joint inspection checklists, and quarterly enforcement reporting that constitute the enabling environment for transparent and accountable forest law compliance, rather than financing, directing, or operationalizing physical enforcement actions in the field or equipping enforcement personnel with operational gear or training.*
- Under Sub-component 1.2, the strengthening and operationalization of a Forest Monitoring and GIS unit will provide targeted training for FDA central and FDA and LRA field teams to support timely, data-driven inspection and enforcement responses.
 - *Project activities pertain specifically to the analytical and monitoring capacity of the FDA's Forest Monitoring and GIS unit, equipping technical staff with data systems and remote-sensing tools needed to generate evidence-based information to inform regulatory decision-making, and not to training or deploying field enforcement or security personnel in or around the project landscape.*
- Under Sub-component 2.3, priority park infrastructure investments including staff offices and housing, rehabilitation and maintenance of roads and patrol tracks, and demarcation of protected area boundaries are intended to ensure a sustained field presence and effective enforcement at GFNP and LPMR.
 - *The infrastructure investments at GFNP and LPMR including staff offices, housing, and the rehabilitation of roads and patrol tracks are intended solely to establish a basic institutional and administrative field presence for protected area management, supporting the logistical and governance foundations of park administration rather than creating physical enforcement, security, or armed personnel footprint within or surrounding the protected area landscapes*

Based on the above context, the project will not involve, support, or finance physical enforcement actions by rangers, forest guards, or security personnel, nor will it include the procurement of arms, ammunition, armed equipment, or security gear of any kind or the training of rangers, forest guards, or any armed or paramilitary personnel in any part of the project landscape.



In accordance with the World Bank's Good Practice Note (GPN) on Managing the Risks of Projects Involving Protected and Conserved Areas²⁷, this section of the ESMF establishes the framework for identifying, assessing, and managing the environmental and social (E&S) risks and impacts associated with law enforcement and community monitoring activities at Gola Forest National Park (GFNP) in Grand Cape Mount and Gbarpolu Counties, and Piso Lake Multiple Use Reserve (LPMR) in Grand Cape Mount County, under Sub-component 2.3 of LiFE-P.

Annex III of the GPN establishes the specific requirements for assessing and managing law enforcement functions including ranger operations, security personnel, institutional capacity, Codes of Conduct, and grievance mechanisms which are relevant to Sub-component 2.3 to strengthen the management of Gola Forest National Park (GFNP) and Lake Piso Multiple Use Reserve (LPMR) where the World Bank finances activities including equipment, capacity building, patrol infrastructure, and community monitoring systems. In this light, the project will conduct an Institutional Assessment (IA) to identify key institutional gaps and ensure effective ESF implementation and compliance with the World Bank's Good Practice Note (GPN) on Managing the Risks of Projects Involving Protected and Conserved Areas; the IA will be finalized and disclosed 3 months after project effective date.

Screening of Enforcement Activities

As required by Annex III of the PA-IGN (2025), all enforcement-related activities under Sub-component 2.3 will be subject to the following enforcement screening process before any implementation commences (table 8):

Table 8: Enforcement screening process

Step	Description	Enforcement screening process
Step 1	Classification of Activity	Determine whether the proposed activity constitutes a "law enforcement activity" within the meaning of the PA-IGN (2025) — i.e., whether it involves: armed personnel operating within or adjacent to PA boundaries; restriction of community access to natural resources; joint operations with any other armed state security actors (LNP); or the procurement or deployment of enforcement equipment (vehicles, GPS, radio systems).
Step 2	Institutional Assessment	For all enforcement-related activities under Sub-component 2.3, the project will conduct an Institutional Assessment (IA) to identify key institutional gaps and ensure effective ESF implementation and compliance with the World Bank Interim Guidance Note on Protected Areas; the IA will be disclosed 3 months after project effective date.
Step 3	Personnel Vetting	Verify that all proposed enforcement actors have been vetted in accordance with Section 4.2 of this ESMF section, including exclusion of any individual with a credible history of past human rights abuses or GBV/SEA/SH.
Step 4	Process Framework	A Process Framework (PF) is being disclosed prior to appraisal. The

²⁷ The World Bank's Good Practice Note (GPN) on Managing the Risks of Projects Involving Protected and Conserved Areas is designed to ensure that all Investment Project Financing (IPF) operations involving protected and conserved areas (PCAs) are designed, assessed, and implemented in full compliance with the World Bank's Environmental and Social Framework (ESF) and related policies, with particular attention to risks that PA management projects pose to the rights, livelihoods, and safety of communities living in or around those areas.



		PF include functioning alternative livelihoods programming in buffer zone communities before any enforcement of access restrictions commences at GFNP or LPMR.
Step 5	GM Operationalization	An enforcement complaint channel within the project GM shall be fully operational, including community awareness of how to submit complaints before activities begin. Grievance Mechanism will be operationally independent from FDA management for complaints related to concession awards, community forestry decisions, and enforcement actions — with such complaints reviewed by the Task Force for the Forest Economy rather than solely by FDA internal management; the risk register will explicitly name elite capture as a risk, rated by likelihood and impact, and will include defined escalation triggers (including complaint volume thresholds) that automatically initiate an independent review when reached.

Exclusion Criteria for Enforcement Activities

Section 2.5 of this ESMF presents the activities that will be excluded. The following are excluded from the project financing, as set out, consistent with the World Bank's Good Practice Note (GPN) on Managing the Risks of Projects Involving Protected and Conserved Areas (2025):

- Procurement of weapons or ammunition for any purpose
- Deployment of military or para-military personnel in PA law enforcement roles
- Enforcement methods involving cruel, inhuman, or degrading treatment of any person
- Enforcement operations that restrict community access to subsistence resources without prior completion of the Process Framework and activation of alternative livelihood support
- Deployment of personnel with a credible, undisclosed history of human rights abuses, GBV, or serious misconduct
- Joint operations with any armed actor that have not been assessed under the GPN-Security framework and whose conduct history has not been reviewed.

E&S Risks Associated with Enforcement actors at GFNP and LPMR

The project will conduct an Institutional Assessment (IA) to identify key institutional gaps and ensure effective ESF implementation and compliance with the World Bank Interim Guidance Note on Protected Areas; the IA will be disclosed 3 months after project effective date.

Table 9: E&S Risks Associated with Enforcement actors at GFNP and LPMR

	Risk	Mitigation Measures	Instrument(s)	Responsible Actor(s)	Timing
Human Rights Risks					
	Use-of-force violations	Develop and adopt a Code of Conduct (CoC) enforcement actors with use-of-force protocols consistent with UN Basic Principles on the Use of Force and Firearms 105 Deploy remote supervisory	Prior to appraisal, the project will develop the Security Management Plan (SMP);	FDA PIU FDA PIU (E&S/GBV Specialists); FDA Conservation Department. FDA Extension	Before any enforcement activity commences



	Risk	Mitigation Measures	Instrument(s)	Responsible Actor(s)	Timing
		systems including radio communication equipment Conduct pre-deployment training on human rights and use of force Establish a Security Incident Register with mandatory reporting of all use-of-force incidents;	Code of Conduct (CoC); Use-of-Force Protocol; Security Incident Register; Pre-Deployment Training Program	Officers (Regional); Community Liaison NGO	
	Arbitrary detention and extortion-Enforcement actors controlling access to livelihood	Prepare SMP Develop and adopt a Code of Conduct (CoC) for enforcement actors; Establish independent enforcement complaint channel in project GM. Conduct community awareness sessions on enforcement actors - prohibited conduct and complaint procedures	Prior to appraisal, the project will develop the Security Management Plan (SMP); Code of Conduct (CoC); Project GM (dedicated enforcement complaint channel); Community Awareness Protocol; Security Incident Register;	FDA PIU (E&S/GBV Specialists); FDA Conservation Department. FDA Extension Officers (Regional); Community Liaison NGO	Before enforcement activities; community awareness before first deployment
	Criminalization of subsistence users-Communities depending on GFNP and LPMR resources	Ensure Process Framework (PF) is finalized, disclosed, and fully operational including active alternative livelihoods programs	Prior to appraisal, the project will develop and disclose the Process Framework (PF) consistent with ESS5; Buffer Zone Management Guidelines; enforcement actors Code of Conduct; Project GM; Alternative Livelihoods Program	FDA PIU (E&S/GBV Specialists); FDA Conservation Department. FDA Extension Officers (Regional); Community Liaison NGO	Prior to appraisal, the project will develop and disclose the Process Framework
Conflict Risks					
	Community-enforcement actors conflict	Establish a PA-Community Interface Protocol defining agreed access arrangements, prohibited enforcement	PA-Community Interface Protocol	FDA PIU (E&S/GBV Specialists); FDA	Established before enforcement strengthening



	Risk	Mitigation Measures	Instrument(s)	Responsible Actor(s)	Timing
		actions. Engage community eco-guards from buffer zone communities as official members of monitoring teams		Conservation Department / GFNP/ LPMR Park Warden; FDA Regional entities	
	Resource access conflict at GFNP/LPMR	Establish a formal GFNP /LPMR Co-Management Committee. Develop a participatory GFNP/LPMR Zoning Plan; Provide enforcement actors with clear, written legal authority mapping permissible vs. restricted uses within LPMR Establish a resource access dispute resolution mechanism; Establish a cross-border incident reporting and response procedure	GFNP/LPMR Management Plan	FDA PIU (E&S/GBV Specialists); FDA Conservation Department. GFNP Park Warden (MOU and protocol development); LPMR Park Warden; FDA Regional entities	Established before any enforcement of access restrictions. MOU and joint patrol protocols before any cross-border operations. GFNP/LPMR management plan
	Conflict from patrol track improvement	Conduct community consultations explaining the purpose, scope, and timeline of patrol track rehabilitation before works; Include community representatives in patrol track planning process to incorporate community concerns Establish clear community communication channels during rehabilitation works	Community Consultation Protocol	FDA PIU (E&S/GBV Specialists); FDA Conservation Department. GFNP/LPMR Park Warden FDA Regional entities	Before construction commences; access controls installed before tracks are operational
SEA/SH Risks					
	SEA/SH enforcement by actors	Include comprehensive SEA/SH prevention module (2 days) in mandatory pre-deployment training for all enforcement actors and community monitors, delivered by a qualified GBV service provider; Establish a dedicated, confidential SEA/SH complaint channel separate from general GM; Engage a qualified GBV service provider with	The Project will prepare a draft SEA/SH action plan and accountability framework by appraisal and will finalize it within 3 months following Project effective date. enforcement actors Code of Conduct;	PIU GBV Specialist GBV Service Provider	GBV service provider contracted and SEA/SH channel operational before any activity by enforcement actors; awareness sessions before enforcement commences



	Risk	Mitigation Measures	Instrument(s)	Responsible Actor(s)	Timing
		presence in Grand Cape Mount and Gbarpolu Counties	SEA/SH Complaint Channel; Survivor-Centered Response Protocol; Pre-Deployment Training Program (SEA/SH Module)		
Access Restriction Impacts					
	Restriction of access to natural resources	Ensure Process Framework (PF) is finalized, disclosed, and fully operational; Conduct participatory resource-use mapping across all buffer zone communities at GFNP (Grand Cape Mount, Gbarpolu) and LPMR (Grand Cape Mount); Review GM complaints related to livelihood restrictions monthly; Conduct bi-annual independent assessment of livelihood restoration programs for communities affected by access restrictions.	Prior to appraisal, the project will develop and disclose the Process Framework (PF) consistent with ESS5; Project GM;	FDA PIU (E&S/GBV Specialists); FDA Conservation Department. GFNP/LPMR Park Warden FDA Regional entities	PF alternative livelihoods operational before enforcement strengthening;

Code of Conduct and Training

The project will conduct an Institutional Assessment (IA) to identify key institutional gaps and ensure effective ESF implementation and compliance with the World Bank Interim Guidance Note on Protected Areas; the IA will be disclosed 3 months after project effective date. Also, prior to appraisal, the project will develop and disclose the Process Framework (PF) to establish a transparent, participatory, and community-driven process through which potentially affected persons and communities meaningfully participate in the identification of project-induced access restrictions consistent with ESS5.

However, before any enforcement or monitoring activities commence at GFNP or LPMR, the FDA will develop, adopt, and ensure the endorsement by all relevant enforcement personnel of a Code of Conduct of enforcement actors consistent with ESS4, the UN Basic Principles, the UN Code of Conduct for Law Enforcement Officials, and the IRF Global Ranger Competences specifically at GFNP or LPMR in Gbarpolu, and Grand Cape Mount counties. The Code of Conduct will be reviewed and approved by the World Bank before adoption.

The Code of Conduct shall include:



- Define prohibited conduct, including use of excessive or unlawful force; SEA and SH; arbitrary detention; extortion; intimidation of community members; unauthorized confiscation of property; unauthorized entry into sacred sites or culturally sensitive areas; disclosure of complainant identities; non-reporting of incidents or colleague misconduct; and engagement in commercial bushmeat or wildlife trade;
- Set out use-of-force protocols consistent with the UN Basic Principles, including minimum necessary force; proportionality; de-escalation as the primary response; prohibition of use of force for preventive purposes; and specific protocols for use of firearms;
- Establish a clear disciplinary framework with defined penalties for each category of violation, including dismissal for serious violations;
- Apply to all FDA enforcement actors at GFNP or LPMR in Gbarpolu, and Grand Cape Mount counties, including community-based monitoring team members, through contractual or operational agreements any or LNP personnel conducting joint patrols under the project;
- Code of Conduct for enforcement actors should be adopted and operational before commencement of relevant activities.

Vetting of Enforcement Personnel

The project will conduct an Institutional Assessment (IA) to identify key institutional gaps and ensure effective ESF implementation and compliance with the World Bank Interim Guidance Note on Protected Areas; the IA will be disclosed 3 months after project effective date. Also, prior to appraisal, the project will develop the Security Management Plan (SMP).

However, before any FDA enforcement actors at GFNP or LPMR in Gbarpolu, and Grand Cape Mount counties is deployed or under the project, the FDA /PIU will conduct structured vetting consistent with ESS4 paragraph 26 and the Good Practice Note on Assessing and Managing the Risks and Impacts of the Use of Security Personnel, including: review of personnel records and prior disciplinary proceedings; reference checks with community leaders in prior posting areas; and self-disclosure questionnaires. Any individual with a credible history of past human rights abuses, GBV, or serious misconduct will be excluded from deployment. A confidential vetting register will be maintained by the FDA/PIU including the environmental, social, GBV specialists and a GM Officer within the PIU.

Training Program

All enforcement actors and community monitors will complete the following mandatory pre-deployment training before conducting any project related enforcement activities, consistent with Annex III of the Good Practice Note for Managing the Risks of Projects Involving Protected and Conserved Areas (2025). Refresher training will be conducted annually and immediately following any enforcement incident. Training completion records will be maintained by the FDA/PIU and reviewed by the World Bank.

Table 10: Training Program

Module	Content	Duration	Delivery	Budget (\$ USD)
Human Rights and Use of Force	UN Basic Principles; de-escalation protocols; lawful arrest under Liberian law; firearm protocols	2 days	Consultant (firm) recruited by FDA/PIU	15,000
Code of Conduct for Enforcement actors	CoC requirements; Reporting mechanisms	1 day	Consultant (firm) recruited by	10,000



			FDA/PIU	
GBV, SEA, and SH Prevention	Survivor-centered approach; mandatory reporting obligations; referral pathways	2 days	GBV Service Provider	15,000
Community Engagement and Conflict Management	Community liaison; de-escalation protocols; resource rights; Process Framework obligations;	1 day	Consultant (firm) recruited by FDA/PIU	10,000
GM Procedures	Community based GM pathways	1 day	Consultant (firm) recruited by FDA/PIU	10,000
OHS and Field Safety	First aid; wildlife encounter protocols; radio communication; emergency evacuation	1 day	Consultant (firm) recruited by FDA/PIU	10,000
				70,000

Grievance Mechanism for Enforcement-Related Complaints

Consistent with the World Bank's Good Practice Note (GPN) on Managing the Risks of Projects Involving Protected and Conserved Areas (2025):and the Good Practice Note Assessing and Managing the Risks and Impacts of the Use of Security Personnel, the project GM will include a dedicated, independent channel for enforcement-related complaints expected to be separate from the general project grievances accessible to all community members regardless of literacy, language, physical mobility, or fear of retaliation. The enforcement complaint channel will:

- Route all complaints to the FDA PIU environmental, social, GBV specialists and a GM Officer within the PIU
- Include multiple intake mechanisms: toll-free hotline (in local languages); community complaint boxes at CFMB offices and PA entry points/offices; verbal reporting to community liaison officers; third-party submission through trusted community intermediaries
- Maintain strict complainant confidentiality at all stages
- Route all SEA/SH complaints involving enforcement actors directly to the PIU GBV Specialist and GBV service provider with survivor-centred response from first contact
- Acknowledge complaints within 5 working days; investigate within 15 working days; resolve within 30 working days.
- Escalate serious enforcement-related incidents (use of lethal force, injury, SEA/SH allegations) to the World Bank task team within 48 hours.

Community Awareness of Enforcement Complaints

Before enforcement activities commence, the FDA/PIU will conduct community awareness sessions in all GFNP and LPMR buffer zone communities in local languages through community radio and community meetings covering: the rights of community members in interactions with enforcement actors and monitors prohibited conduct under the CoC for enforcement actors; how to submit a complaint; confidentiality protections for complainants; and the project's commitment to investigating all complaints. These sessions will be repeated annually and following any significant enforcement incident.



Monitoring and Reporting Arrangements for Enforcement-Related Incidents

Table 11: Monitoring and Reporting Arrangements for Enforcement-Related Incidents

Activity	Monitoring and Reporting Arrangements
Security Incident Register	The GFNP Park Warden and LPMR Reserve Manager will each maintain a Security Incident Register recording all enforcement-related incidents, including: date, location, and nature; roles of personnel involved; actions taken; community members affected (by number and demographic, without identifying information); related GM complaints; and disciplinary or follow-up actions. The register will be submitted to the PIU monthly and reviewed at each semi-annual field monitoring visit.
Mandatory 48-Hour Escalation to World Bank	The following incidents will be reported to the World Bank task team within 48 hours using the World Bank Environmental and Social Incident Response Toolkit (ESIRT) Any use of lethal force by enforcement personnel; Any injury to a community member resulting from an enforcement confrontation; Any SEA/SH allegation involving an enforcement personnel member; Any allegation of arbitrary detention, extortion, or serious misconduct by enforcement actors; Any organized community resistance to enforcement activities; Any cross-border enforcement incident at GFNP.
Quarterly Enforcement Monitoring Reports	The FDA PIU including the environmental, social, and GBV specialists within the PIU will prepare quarterly enforcement monitoring reports covering: enforcement activities conducted; GM complaints received, investigated, and resolved (disaggregated by gender, age, and type); CoC compliance and disciplinary actions; training completion rates; community satisfaction survey results; security Incident Register summary; and Process Framework implementation status confirming that alternative livelihoods program is active. Reports will be disclosed publicly.
Annual Independent Audit	An independent consultant with expertise in PA law enforcement, human rights, and community-enforcement actors relations will conduct an annual audit of enforcement activities at GFNP and LPMR, covering: CoC compliance; use-of-force incidents; access restriction impacts; GBV and SEA/SH prevention effectiveness; and vetting compliance. Audit findings will be disclosed publicly, the World Bank and to PA-communities.

Table 12 presents the potential adverse environmental and social risks and impacts and mitigation measures for activities that will have physical footprint.

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Table 12: Potential Environmental and Social Risks and Impacts and Mitigation Measures during the pre-construction, construction, operation and decommissioning phases

Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
PRE-CONSTRUCTION PHASE					
ENVIRONMENTAL					
PRE-CONSTRUCTION	Environmental and social baseline studies	Inadequate baseline environmental and social data leading to poor impact prediction, inappropriate risk categorization, and ineffective mitigation design for High and Substantial risk subprojects	Conduct environmental and social baseline surveys covering biodiversity, land use, water resources, cultural heritage, socioeconomics, and community vulnerability disaggregated by gender and vulnerability status, before subproject screening is finalized for Substantial and High risk activities	FDA/PIU, PIU Environmental Specialist. PIU Social Specialist; Qualified baseline specialists	USD 300,000 per E&S study
Pre-Construction	EPA permit and regulatory compliance	Failure to obtain required EPA EIA Licenses, Certificates of Approval, determinations before physical works commence, leading to regulatory violations and potential project suspension	Initiate EPA permit applications in parallel with E&S instrument preparation; engage proactively with EPA EIA Division from project effectiveness; track permit status in PIU E&S register; confirm EPA approval before any physical works commence; include EPA permit compliance as a mandatory pre-condition in all civil works contracts	FDA/PIU; FDA EPA liaison EPA EIA Division	Included in PIU operating budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
Pre-Construction	Land-use planning and participatory mapping (Sub-components 2.1, 2.2)	Misidentification of ecologically sensitive areas for plantation or restoration activities; risk of encroachment into high conservation value forest	Conduct environmental screening and baseline assessments prior to land-use planning; map and exclude HCV forests, riparian buffers, and biodiversity corridors from plantation and restoration zones	FDA, Environmental Consultants, Community facilitators	\$80,000
Pre-Construction	Feasibility and pre-feasibility studies for PPP infrastructure — roads, ports, DBOT sawmills (Sub-component 3.3)	Identification of infrastructure sites in or adjacent to sensitive ecosystems, wetlands, or forest areas, setting a pathway for significant environmental impacts in subsequent phases	Ensure environmental and social screening is integrated into all pre-feasibility and feasibility study methodologies; require ESIA for all PPP transactions prior to SOP2 investment decisions	FDA, NIC, Transaction Advisors, Environmental Consultants	\$120,000
Pre-Construction	Ecotourism strategy and infrastructure specification at GFNP and LPMR (Sub-component 2.3)	Poorly sited ecolodge footprints, trail networks, and visitor infrastructure risking encroachment into critical habitats and biodiversity corridors	Complete environmental and social assessments for all planned tourism development sites before finalizing infrastructure specifications; apply biodiversity offset principles where avoidance is not possible	FDA, Environmental Consultants, Protected Area Management Units	\$60,000
Pre-Construction	Species selection for woodlots and plantation rehabilitation (Sub-component 2.2)	Introduction of non-native, invasive, or ecologically inappropriate tree species that displace native vegetation and reduce biodiversity	Develop and apply an approved species list prioritizing native, ecologically appropriate species; conduct soil and site suitability assessments prior to species	FDA Technical Staff, Forestry Consultants	\$40,000

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
			selection		
Pre-Construction	NTPF market linkage and commercialization planning (Sub-components 2.1, 3.1)	Commercialization plans that exceed sustainable yield thresholds for target NTFP species, leading to overexploitation before monitoring systems are in place	Conduct NTFP stock assessments and establish sustainable harvest quotas as a prerequisite for market linkage support; integrate harvest monitoring into CFMPs	FDA, NTFP Specialists, Community Facilitators	\$50,000
SOCIAL					
	Land tenure verification and CFMA establishment, formalization, and boundary demarcation (Sub-component 2.1)	Overlapping and unresolved land tenure claims between proposed CFMA boundaries, FMC concession areas, and individual community members generating conflict before project activities commence; land access disputes delaying implementation; exclusion of marginalized groups from boundary setting processes	Conduct systematic participatory land tenure mapping for all proposed CFMA areas; resolve boundary disputes through FDA-mediated dialogue before CFMA recognition is finalized; document all tenure arrangements and file with the Land Authority; integrate tenure findings into subproject risk categorization; apply FPIC principles throughout; establish conflict resolution mechanisms (through the GM) before demarcation begins	FDA/PIU; PIU Social Specialist; FDA Regional Foresters; community facilitation partners; Land Authority	Included in PIU operating budget for CFMA mapping exercise-
Pre-Construction	Participatory land-use planning for restoration and plantation areas (Sub-component 2.2)	Exclusion of women and marginalized groups from planning processes; allocation of land for restoration or commercial use that restricts existing community access and	Ensure meaningful participation standards for women's representation; conduct sex-disaggregated needs assessments;	FDA, Social Specialist, Community Facilitators	\$80,000

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		livelihoods	document and protect existing land use and access rights before allocating areas for restoration or plantation		
Pre-Construction	Preparation of CFMA Community Forest Management Plans (CFMPs) (Sub-component 2.1)	CFMPs that fail to reflect community priorities, women's needs, or the interests of vulnerable groups; over-reliance on elite community voices in planning processes	Use participatory, gender-sensitive planning methodologies; conduct separate consultations with women, youth, and persons with disabilities; integrate women's priorities and constraints explicitly into CFMPs and financial sustainability plans	FDA, Social Specialist, Community Facilitators	\$70,000
Pre-Construction	PPP transaction and concession framework development at GFNP and LPMR (Sub-component 2.3)	Concession frameworks that fail to adequately protect community rights, restrict resource access, or perpetuate inequitable benefit-sharing arrangements	Conduct social impact assessments as part of PPP transaction advisory; ensure community benefit-sharing mechanisms are legally embedded in concession agreements; engage communities in PPP design processes	FDA, Transaction Advisors, Legal Counsel, Community Representatives	\$80,000
Pre-Construction	Private sector skills demand assessment for SEC (Sub-component 3.2)	Assessment findings that reflect industry preferences without adequately accounting for women's and youth's access constraints, or that recommend training pathways inaccessible to marginalized groups	Integrate gender and social inclusion analysis into skills demand assessment; map barriers faced by women and youth in accessing forestry sector training and employment; design	FDA FTI, Skills Assessment Consultants, Gender Specialists	\$40,000

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
			flexible training modalities to accommodate these constraints		
Pre-Construction	FPIC processes for community land-based activities	Communities not meaningfully consulted before project activities affecting their land and resources are approved, leading to social conflict, rights violations, and loss of community trust	Conduct FPIC processes for all subprojects on or affecting community land or customary resource access; document consent with community signatures; ensure sex disaggregated consultations to capture women's perspectives; disclose FPIC documentation to World Bank before subproject authorization	PIU Social Specialist; PIU GBV Specialist; community facilitation partners	USD 2,000–5,000 per FPIC process
Pre-Construction	Cultural heritage pre-works screening (tangible and intangible)	Not identifying sacred forests, burial grounds, Poro/Sande society areas, and archaeological sites before works commence, leading to inadvertent cultural heritage disturbance and community conflict	Conduct desk-based cultural heritage review and community-based identification for all proposed activity areas; engage community elders, traditional leaders, and society representatives in gender-separated consultations; conduct cultural heritage walkover surveys by qualified specialists for all civil works and land disturbance sites; demarcate exclusion zones	PIU Environmental Specialist; PIU Social Specialist; cultural heritage specialist; MICAT	Included in contractor operating budget
Pre-Construction	GM establishment and stakeholder engagement	Inadequate stakeholder engagement and absence of	Implement SEP; train community grievance	FDA/PIU; PIU Social Specialist;	Cost embedded in community GM training

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		accessible GM before project activities begin, leading to community grievances, opposition, and loss of social license	focal points in all CFMA areas before activities commence; establish national, county, and community GM tiers; disclose GM channels in local languages at CFMB offices and community notice boards; conduct GM awareness sessions in all project communities	FDA Regional Foresters; community facilitation partners Civil works Contractors;	sessions (See Table 15: Proposed Training and Capacity Building Approach)
Pre-Construction	Labor management and contractor compliance	Contractors unaware of or not committed to LMP requirements, leading to labor rights violations before works commence	Include LMP provisions and Code of Conduct as mandatory contract annexes for all civil works, service providers; brief all contractors on LMP requirements at contract signing; verify Code of Conduct signed by all workers before any works commence	FDA/PIU; PIU Social Specialist; PIU Procurement Specialist	Included in PIU and operating budget and contractor contract/BOQ
OCCUPATIONAL HEALTH AND SAFETY					
Pre-Construction	Site preparation for woodlots, plantations, and restoration areas (Sub-component 2.2)	Inadequate OHS planning for land preparation activities involving manual labor in remote areas without access to medical services	Develop OHS plans for all land-based activities prior to commencement of works; identify and map nearest health facilities and emergency response routes; ensure first aid kits and trained personnel are available at all work sites	Plantation Contractors, OHS Officer	\$40,000
Pre-Construction	Procurement of field equipment and vehicles for FDA regional offices (Sub-component 1.2)	Risks from inadequately maintained vehicles used in remote and challenging	Establish vehicle maintenance protocols and pre-deployment	FDA PIU FDA Drivers, Regional Office	\$30,000

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		terrain	safety inspections; provide defensive driving training to all vehicle operators; enforce seatbelt and load limits policies	Managers	
CONSTRUCTION PHASE					
ENVIRONMENTAL					
Construction	Boundary Marking and Demarcation of 20 CFMAs	Vegetation clearance along boundary lines including cutting of undergrowth, placement of boundary markers, and establishment of demarcation paths can disturb native vegetation, expose soil to erosion, and create linear clearings that fragment habitat and facilitate the entry of invasive plant species along cleared corridors. Improper disposal of construction materials — including cement for marker posts, paint can generate localized solid waste	Vegetation clearance along boundary lines will be strictly minimized to the width necessary for marker placement and visibility. Cleared boundary corridors will be revegetated with native understorey species immediately following demarcation to reduce invasive species. Solid waste from demarcation activities including cement bags, packaging, and flagging materials will be collected and removed from the forest by field teams at the end of each working day.	Civil works Contractors;	Included in contractor operating budget
Construction Establishment of 3,375 ha of community woodlots (Sub-component 2.2); Rehabilitation of 9,741	Site clearing and vegetation removal for woodlots, plantations, sourcing of materials and restoration of degraded forests and lands	Loss of natural vegetation, topsoil, and associated flora species; habitat fragmentation; spread of invasive plant species through site preparation equipment	Project activities will not impact wildlife during site clearing activities within the project's footprint. Revegetate fragmented areas with native	Civil works Contractors; community forestry workers;	Included in contractor operating budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
ha of old tree plantations (Sub-component 2.2); Restoration of 6,000 ha of degraded forests and lands (Sub-component 2.2); Rehabilitation of staff offices, housing, patrol tracks, and roads at GFNP and LPMR (Sub-component 2.3); Rehabilitation of FTI facilities and installation of processing equipment SEC (Sub-component 3.2)			species and conduct quarterly transect surveys within and around restoration sites to track vegetation recovery Restrict clearing to minimum required footprint; retain topsoil for reinstatement; protect vegetation at work area boundaries; prohibit uncontrolled burning; clean equipment before entering new sites to prevent invasive species introduction; establish firebreaks before any authorized burning		
Construction	Earthworks, excavation, and grading for civil works and access roads and tracks	Soil compaction and erosion, from machinery; and sedimentation of nearby watercourses particularly on steep slopes in Grand Cape Mount, and Gbarpolu during high-rainfall wet season	Use appropriate, low-impact equipment for rehabilitation works. Install silt fences, sediment traps, before earthworks commence; phase land disturbance to minimize exposed soil; stabilize cut slopes immediately after grading; maintain 30-meter buffer zones between earthworks and watercourses; revegetate disturbed surfaces promptly with native species	Civil works contractors;	Included in contractor budget for erosion control infrastructure per site
Construction	Construction near Lake Piso and Gola Forest NP buffer zones	Sedimentation and turbidity increase in ecologically	Construction Environmental and	Civil works contractors	Included in contractor budget for water quality monitoring

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
	Rehabilitation of staff offices, housing, patrol tracks, and roads at GFNP and LPMR (Sub-component 2.3)	sensitive water bodies; disturbance of aquatic habitats; contamination from construction runoff affecting biodiversity and community water sources	Social Management Plans (CESMPs) will be required for all civil works at GFNP and LPMR, detailing site-specific mitigation measures for each identified impact. Establish 50-meter riparian buffer zones around Lake Piso shoreline and all watercourses in Gola buffer zone; prohibit equipment washing, fuel storage, and chemical use within 100 meters of water bodies; conduct water quality monitoring before, during, and after construction		
	Rehabilitation of staff offices, housing, patrol tracks, and roads at GFNP and LPMR (Sub-component 2.3)	Sourcing construction materials including sand, gravel, and timber from local environments could drive localized resource extraction if not managed through responsible procurement standards.	A responsible materials sourcing plan will be prepared and enforced, prohibiting extraction of construction materials from within protected area boundaries	Civil works contractors	Included in contractor operating budget
	Rehabilitation of staff offices, housing, patrol tracks, and roads at LPMR (Sub-component 2.3)	Road and patrol track rehabilitation even along existing alignments can generate soil erosion and surface runoff that carries sediment into watercourses, with particular concern at LPMR given the sensitivity of the Lake Piso aquatic ecosystem to sedimentation	Prepare CESMP for all civil works at GFNP and LPMR, detailing site-specific mitigation measures for each identified impact. Road and patrol track rehabilitation will be strictly confined to existing alignments,	Civil works contractors	Included in contractor operating budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		and nutrient loading.	with no widening beyond the minimum operationally necessary footprint.		
	Rehabilitation of staff offices, housing, patrol tracks, and roads at GFNP and LPMR (Sub-component 2.3)	Construction activities generate noise, dust, and vibration that can disturb the ecological integrity of sensitive habitats in proximity to work sites. Sourcing of construction materials including sand, gravel, and timber from local environments could drive localized resource extraction if not managed through responsible procurement standards.	Prepare CESMP for all civil works at GFNP and LPMR, detailing site-specific mitigation measures for each identified impact.	Civil works contractors	Included in contractor operating budget
	Rehabilitation of staff offices, housing, patrol tracks, and roads at GFNP and LPMR (Sub-component 2.3)	Fuel and lubricant storage and use at construction sites presents spillage and soil contamination risks, particularly in areas with high water table levels or proximity to surface water bodies	Fuel and chemical storage will comply with spill containment standards; with spill response kits maintained at all work sites.	Civil works contractors	Included in contractor operating budget
Construction	Fuel, lubricant, and chemical storage and handling	Spills and leaks contaminating soils and surface water; fire hazards from improper fuel storage; worker and community exposure to hazardous chemicals	Store fuels, lubricants, and chemicals in dedicated, ventilated stores away from water bodies and community areas; equip stores with spill kits and fire extinguishers; train workers in spill response; conduct weekly store inspections	Civil works Contractors	Included in contractor budget
Construction	Construction and demolition waste generation	Uncontrolled disposal of construction waste concrete,	Prepare and implement Waste Management	Civil works contractors;	Included in contractor budget for Waste Management

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		timber offcuts, packaging, excavated material contaminating soils, watercourses,	Plans before works commence; segregate waste streams on site; contract licensed waste disposal service providers for non-inert waste; prohibit open burning and uncontrolled dumping; maintain disposal records		
Construction	E-waste from IT infrastructure deployment and field equipment to FDA regional offices (Sub-component 1.2)	Improper disposal of old IT equipment, batteries, and electronic components generating toxic waste	Establish e-waste inventory and management protocol before IT deployment; contract certified e-waste recycling or disposal service providers; prohibit disposal of electronic equipment in general waste streams; maintain disposal certificates	Contractor FDA IT; PIU Environmental Specialist	Included in contractor budget
Construction	Asbestos and hazardous materials in existing FTI buildings (Sub-component 3.2)	Worker and community exposure to asbestos fibres during rehabilitation of FTI/SEC facilities Generation of construction waste, dust, and noise; disposal of demolition materials	Conduct asbestos and hazardous materials survey before rehabilitation works commence; prepare asbestos management plan if asbestos is identified; engage licensed asbestos removal contractor; provide appropriate PPE; dispose of asbestos waste through EPA-approved channels. Use dust suppression	Civil works contractor; asbestos removal specialist; EPA	Included in contractor budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
			measures; ensure proper disposal or recycling of demolition materials;		
Construction	Dust and air emissions from construction equipment and earthworks (Associated with all Construction/rehabilitation activities)	Dust nuisance and respiratory impacts on construction workers and nearby communities; vehicle exhaust emissions	Water unpaved construction roads and work areas regularly during dry conditions; cover trucks transporting aggregate and fine materials; restrict dust-generating activities during high winds; maintain equipment to minimize exhaust emissions; provide respiratory PPE to workers in dusty environments	Civil works Contractors	Included in contractor budget
Construction	Noise and vibration from construction activities (Associated with all Construction/rehabilitation activities)	Noise disturbance to community residents, schools, and health facilities; vibration damage to adjacent structures; wildlife disturbance in sensitive habitat near PAs	Restrict noisy construction activities to 7:00 AM–6:00 PM weekdays and Saturdays; prohibit construction noise on Sundays and public holidays; notify communities 48 hours before particularly noisy operations; install noise barriers within 100 meters of community settlements	Civil works Contractors;	Included in contractor budget for noise monitoring
Construction	Biodiversity disturbance near Gola Forest NP and Lake Piso MUR Rehabilitation of staff offices, housing, patrol tracks, and roads at GFNP and LPMR (Sub-component 2.3)	Noise, dust, and vibration from construction activities affecting ecological integrity of sensitive conservation landscapes; sedimentation of adjacent water bodies from road rehabilitation and	Conduct E&S screening and where required, prepare Biodiversity Management Plan (BMP) Implement BMP for High-risk sites in GFNP	Civil works contractors; FDA PIU/FDA Conservation Dept.	Included in contractor budget for BMP implementation and monitoring

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		increased human presence Project activities are not expected to impact wildlife within the proposed project corridors.	and LPMR; train all workers on wildlife encounter protocols; restrict construction to daylight hours near sensitive habitat		
Construction	Invasive species spread during restoration and plantation establishment	Spread of invasive plant species particularly through imported planting stock, equipment, and soil disturbance	Procure planting stock from certified nurseries using approved native species lists; inspect and clean equipment entering new sites; implement manual invasive species control as the first-line approach; monitor restoration sites quarterly	Civil works Contractors FDA Extension Officers; community forestry workers	Included in contractor budget for invasive species monitoring
Construction	Wildfire risk during woodlot, plantation, and restoration establishment	Uncontrolled fire spreading from site preparation to adjacent natural forest, community farmland, and PA buffer zones	Prepare Wildfire Management Plan in the CESMP before land preparation commences; establish firebreaks before any burning; prohibit open burning without PIU written approval and FDA oversight; train community workers in fire suppression; establish rapid response protocols	Civil works Contractors FDA Extension Officers; community workers; community fire teams; FDA PIU Environmental Specialist	Included in contractor budget for Wildfire Management Plan
SOCIAL					
	Boundary Marking and Demarcation of 20 CFMAs	Given Liberia's unresolved and overlapping land tenure landscape the demarcation of CFMA boundaries can exacerbate land disputes between neighboring	A robust stakeholder engagement and FPIC-aligned consultation process will be conducted with all communities whose	FDA PIU- Social Specialist, GBV Specialist FDA Regional Staff	Included in contractor budget Included in PIU operating budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		communities, between communities and existing commercial concession holders, and between customary land claimants and statutory title holders particularly where CFMA boundaries overlap with or are adjacent to Forest Management Contracts, Timber Sale Contracts, or other existing tenure arrangements. All boundary negotiations will be documented, with agreements recorded in writing and shared with all parties in accessible formats and local languages.	lands, resources, or movement may be affected by CFMA boundary demarcation, prior to and throughout the process	Civil works Contractors	
	Boundary Marking and Demarcation of 20 CFMAs	The demarcation process risks excluding women from boundary negotiations	Gender-sensitive engagement protocols will be applied, with dedicated consultations conducted with women's groups separately from mixed community forums to ensure women's land use interests are explicitly captured in boundary determinations.	FDA PIU- Social Specialist, GBV Specialist FDA Regional Staff Civil works Contractors	Included in contractor budget Included in PIU operating budget
	Boundary Marking and Demarcation of 20 CFMAs	Boundary demarcation restricts the movement or resource access of communities that have historically used the demarcated landscape, it can generate grievance and conflict particularly among	Independent social facilitators will support boundary negotiations where tensions between neighboring communities or with concession holders are identified. A conflict	FDA PIU- Environmental and Social Specialist, GBV Specialist FDA Regional Staff	Included in contractor budget Included in PIU operating budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		marginalized households with no alternative livelihood options.	resolution mechanism will be established and communicated to all affected parties before demarcation commences, providing a structured pathway for resolving boundary disputes	Civil works Contractors Social facilitators	
	Boundary Marking and Demarcation of 20 CFMAs	The formalization of boundaries may expose communities to exploitation by elite actors		FDA PIU- Environmental and Social Specialist, GBV Specialist FDA Regional Staff Civil works Contractors	Included in contractor budget Included in PIU operating budget
Construction	Cultural heritage disturbance during earthworks and land clearing	Inadvertent disturbance, damage, or destruction of previously unknown archaeological remains, burial grounds, or culturally significant features during excavation and land clearance	Implement mandatory Chance Find Procedure for all civil works and land disturbance contracts; provide cultural heritage induction training in local languages; stop works immediately and notify PIU within 24 hours upon discovery; notify MICAT and National Museum within 48 hours; cordon off find area	Contractors; community forestry workers; PIU Environmental Specialist; MICAT; National Museum	Included in contractor budget for chance find assessment
Construction	Labor influx -GBV, SEA, and community-worker conflict	Concentration of male migrant workers in rural forest communities increasing GBV/SEA risks for local women and girls;	Prepare and Implement Labor Influx Management Plans for all civil works sites with significant in-migration;	Civil works Contractors; PIU GBV Specialist; PIU	Included in contractor budget Included in PIU operating

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		community-worker tensions over resource use;	enforce signed Code of Conduct for all workers; deploy female GM focal points at labor camps; establish GBV/SEA/SH referral pathways; prohibit alcohol during working hours; conduct regular community-worker dialogue sessions	Social Specialist; community facilitation partners	budget
Construction	Child labor in community forestry, plantation, and IGA activities	Children below minimum working age (16 years) participating in plantation works, woodlot establishment, IGA operations, and chainsaw milling in remote communities	Conduct age verification for all community workers; prohibit engagement of workers below 16 years; restrict workers aged 16–17 from hazardous activities; conduct awareness-raising with CFMB leaders; include child labor screening in all labor compliance audits; establish anonymous reporting channels	Civil Contractors; CFMB supervisors; community facilitation partners; PIU Social Specialist	Included in labor audit budget
Construction	Forced and compulsory labor in community operations	Community members - particularly women and marginalized groups - coerced into unpaid or underpaid labor through social pressure from CFMB leadership or community elders	Document community worker engagement terms before activities commence; conduct anonymous worker interviews during labor audits; establish accessible worker grievance mechanism with non-retaliation protection; train PIU and FDA staff to identify forced labor	CFMB supervisors; PIU Social Specialist; independent labor auditor	Included in labor audit budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
			indicators		
Construction	Physical and economic displacement without completed and approved RP	Involuntary displacement of households, structures, or enterprises caused by nature-based tourism including ecotourism PPP investment at both Gola Forest National Park and Lake Piso Multiple Use Reserve, or CFMA boundary demarcation without a cleared RP	Prepare site-specific RPs within the RF framework (RF will be prepared prior to project appraisal) before any displacing subproject is authorized; complete compensation payments before physical work commence; document affected person consent to entitlements; submit RPs to World Bank for review; establish RP grievance mechanism	PIU Social Specialist; qualified resettlement specialist;	RP preparation cost; compensation costs site-specific costs to be determined during implementation
Construction	Exclusion of women and vulnerable groups from project benefits and labor	Women and vulnerable groups persons with disabilities, landless households systematically excluded from paid labor, governance roles, and commercial benefits through cultural norms and male-dominated recruitment	Establish gender-equitable recruitment targets minimum 35% women community workers; use gender-separated recruitment and consultation sessions; monitor gender-disaggregated labor and benefit data quarterly; implement corrective measures where targets are not met; prioritize vulnerable groups in subproject eligibility criteria	Civil Contractors Community facilitation partners; CFMB supervisors; PIU Gender Specialist	Included in contractor budget Included in PIU operating budget
Construction	Elite capture of CFMA commercial revenues	CFMB Executive Committee members or community elites capturing commercial forestry revenues and	Train CFMBs on transparent governance and financial management;	Community facilitation partners; PIU Social Specialist	Included in audit budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		matching grant benefits at the expense of women, youth, and marginalized households	establish internal CFMB audit mechanisms; require community-level financial reporting posted publicly; include anti-capture provisions in CFMB constitutions; ensure GM is accessible to all community members; conduct annual community satisfaction surveys		
Construction	Infrastructure development for PPP projects - roads, ports, sawmills (Sub-component 3.3)	Temporary or permanent displacement of existing land users and economic activities; disruption of access to livelihoods and community resources along infrastructure corridors	Conduct resettlement screening and, where required, prepare Resettlement Plans (RPs) in compliance with ESS5; ensure meaningful consultation with affected communities; provide fair and timely compensation for lost assets and livelihoods	FDA, NIC, Resettlement Specialists, PIU	\$150,000
OCCUPATIONAL HEALTH AND SAFETY					
Construction	Forestry operations	Serious injury or fatality from operation, accidents; wild animal encounters; heat stress; absence of emergency response in remote locations	Implement OHS plans before harvesting commence; provide mandatory chainsaw safety training and certification; enforce PPE helmet, hearing and eye protection, safety boots; prohibit solo felling; deploy first aid and evacuation protocols at each site	Contractors	Included in contractor budget for OHS implementation
Construction	Civil works (CFMB offices, FTI/SEC rehabilitation)	Falls from height; electrocution; structural collapse; heavy machinery	Prepare and implement site-specific OHS Plans and C-ESMPs before	Civil works contractors;	Included in contractor budget for OHS implementation

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		accidents; construction dust and noise exposure; traffic accidents	works commence; conduct daily toolbox talks; enforce PPE use; install safety signage and site fencing; maintain first aid facilities and trained personnel on each shift; conduct monthly OHS inspections		
Construction	Community workers in plantation and restoration activities	Injuries from hand tools; heat stress; snake and insect bites; physical exhaustion; inadequate access to first aid in remote forest locations	Provide basic OHS induction training in local languages before activities commence; provide appropriate hand tools and basic PPE; enforce rest breaks and hydration provisions; deploy first aid kits; establish medical referral and evacuation protocols; assign trained community first aid attendant per work group	Civil works contractors Community facilitation partners; FDA Extension Officers; CFMB supervisors	Included in contractor budget for OHS implementation community OHS training session
OPERATION AND MAINTENANCE PHASE					
ENVIRONMENTAL					
Operation and Maintenance	Forest degradation and encroachment into CFMAs and PAs	Unauthorized logging, agricultural encroachment, and charcoal production within CFMA boundaries and PA buffer zones particularly along new access roads; cumulative landscape-scale deforestation from multiple simultaneous activities	Strengthen community-based forest monitoring under Sub-component 2.2; deploy FDA enforcement teams using risk-based protocols under Sub-component 1.1; maintain CFMA boundary markers and signage; publish	FDA; Community Monitors; FDA Regional Foresters; PIU Environmental Specialist	Included in FDA monitoring cost

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
			quarterly enforcement reports; engage communities as the primary first line of detection and reporting		
Operation and Maintenance	Induced deforestation along PPP road corridors	New road access attracting informal logging, agricultural conversion, and settlement along corridors beyond the direct project footprint	Prepare road corridor management plans as part of PPP feasibility studies; establish community surveillance zones; include anti-encroachment provisions in PPP concession agreements; monitor land cover change using remote sensing quarterly	PPP operators; FDA Regional Foresters; Community Monitors;	Included in FDA remote sensing monitoring cost
Operation and Maintenance	Biodiversity loss in PA buffer zones from nature-based tourism including ecotourism PPP investment at both Gola Forest National Park and Lake Piso Multiple Use Reserve, and livelihood operations Increased visitor pressure on sensitive habitats and biodiversity	Disturbance to wildlife, nesting sites, and habitat from nature-based tourism including ecotourism PPP investment, ongoing community livelihoods, and access infrastructure maintenance at Gola Forest NP and Lake Piso MUR	Implement and monitor Biodiversity Management Plans at both ecotourism PPP investment sites; establish tourism carrying capacity limits and visitor management protocols; conduct, monitor key wildlife indicator species annually; restrict tourist access to designated trails and facilities	nature-based tourism including ecotourism PPP investment operator; FDA Conservation Dept.; FDA Protected Area Management Units	Included in FDA biodiversity monitoring cost
Operation and Maintenance	Water quality degradation from plantation operations, sawmill effluent, and IGA activities Saw milling activities under PPP	runoff, sawmill effluent, drainage, and sediment from ongoing plantation and processing operations contaminating community	Monitor water quality at designated sampling points downstream of active plantation, restoration, sawmill,	Plantation managers; sawmill operators; IGA participants; PIU	Included in FDA water quality sampling and analysis cost

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
	arrangements will be determined in the pre-feasibility and feasibility studies	drinking water sources and aquatic ecosystems	sites semi-annually; require sawmill effluent treatment before processing operations commence	Environmental Specialist	
Operation and Maintenance	Fire risk during operational plantation, woodlot, and restoration management Fire risk during dry season management activities;	Uncontrolled fire during dry season maintenance and harvesting damaging productive stands and adjacent natural forest	Maintain operational Wildfire Management Plans; conduct pre-dry-season firebreak maintenance annually; train community fire response teams; establish rapid response reporting through community monitors and FDA Regional Offices	Plantation operators; CFMB supervisors; community fire teams; FDA Regional Foresters	Included in FDA annual firebreak site maintenance cost
Operation and Maintenance	LiberTrace and GIS forest monitoring systems (Sub-component 1.2)	System downtime and monitoring gaps creating blind spots in forest cover tracking; cybersecurity breaches compromising data integrity	Maintain backup connectivity and redundant systems; implement cybersecurity protocols and access controls; conduct regular system audits; establish incident response procedures	FDA IT Unit, GIS Monitoring Unit	Included in FDA annual budget
Operation and Maintenance	PPP road, port, and DBOT sawmill operations (Sub-component 3.3)	Long-term habitat fragmentation from road networks; water and soil pollution from port and sawmill operations; cumulative landscape-level degradation	Implement operational environmental management plans; conduct annual environmental compliance audits; enforce pollution control standards; establish biodiversity monitoring programs along infrastructure corridors	FDA, NIC, PPP Operators, Environmental Inspectors	Included in FDA annual budget
SOCIAL					

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
Operation and Maintenance	Inequitable community benefit distribution from CFMA and nature-based tourism including ecotourism PPP investment revenues	Revenues from RIL operations, nature-based tourism including ecotourism PPP investment, and IGA subprojects failing to reach women, youth, and marginalized households due to weak governance and accountability	Implement transparent CFMB financial management with publicly posted accounts; conduct annual community benefit distribution audits; require gender-disaggregated beneficiary reporting; monitor nature-based tourism including ecotourism PPP investment revenue-sharing mechanisms quarterly; maintain accessible community GM	CFMB Executive Committees; ecotourism PPP investment operators; PIU Social Specialist; PIU Gender Specialist	Community financial audit
Operation and Maintenance	GBV and SEA during nature-based tourism including ecotourism PPP investment and PPP operations	GBV/SEA risks persisting during operational phase where male-dominated workforces interact with host communities at ecotourism PPP investment and PPP operations	Maintain operational GBV/SEA Action Plans; enforce Code of Conduct for all operational workers; conduct annual GBV/SEA awareness refresher training; maintain survivor referral pathways; monitor incidents through confidential reporting channels monthly	nature-based tourism including ecotourism PPP investment operator; PIU Gender Specialist	Cost for annual GBV awareness training
Operation and Maintenance	Child labor in ongoing community forestry, IGA, and supply chain operations	Children re-engaged in plantation maintenance, NTFP harvesting, and agricultural IGA activities as project monitoring intensity reduces during operations	Conduct child labor compliance audits at least twice per year; deliver annual community awareness refresher sessions on child labor prohibition; include child labor	CFMB supervisors; FDA Extension Officers; PIU Social Specialist	Included in labor audit budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
			monitoring in community forest monitoring protocols; maintain anonymous reporting channels		
Operation and Maintenance	Processing waste accumulation at enterprise and FTI operations	Sawdust, timber offcuts, chemical containers, and processing residues accumulating without adequate disposal at MSME enterprise and FTI/SEC sites	Require active Waste Management Plans as a condition of results-based financing disbursement; verify waste management compliance during PI portfolio monitoring visits; ensure FTI/SEC waste segregation and disposal systems are operational before processing equipment is activated	Enterprise operators; FTI management; PI E&S Focal Points; PIU Environmental Specialist	Cost for waste management compliance
Operation and Maintenance	Intra-community and inter-community conflict over CFMA resources and revenues	Disputes between CFMA communities and neighboring communities, FMC concessionaires, or PA authorities over boundaries, resource access, and commercial revenues escalating during operations	Maintain functional community-level GM with trained focal points; engage county-level dispute resolution authorities proactively; document all disputes and resolutions in PIU GM database; conduct annual community boundary verification exercises	PIU Social Specialist; FDA Regional Foresters; Land Authority	Cost for GM implementation and dispute mediation
Operation and Maintenance	Matching grant and livelihood subproject administration (Sub-components 2.1, 3.1)	Elite capture of grant funds by better-connected community members; exclusion of women, youth, and persons with disabilities from subproject selection and benefits	Apply transparent, criteria-based subproject selection processes as defined in the PIM; enforce inclusion quotas for women-led activities; conduct independent verification of	FDA, SBA, PIU, Independent Verifiers	Included in O&M budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
			beneficiary lists; establish accessible grievance mechanisms		
Operation and Maintenance	Protected area boundary enforcement and management at GFNP and LPMR (Sub-component 2.3)	Economic displacement of communities whose access to forest resources is restricted by strengthened management before alternative livelihoods are operational; escalation of tensions between park management and buffer zone communities	Ensure alternative livelihoods are established and functional before enforcement of resource access restrictions is strengthened; develop and implement a community engagement strategy for both PAs; establish a transparent benefit-sharing mechanism from ecotourism revenues	FDA, Protected Area Management Units, Community Liaison Officers	Included in O&M budget
Operation and Maintenance	Enterprise readiness and results-based financing for MSMEs (Sub-component 3.1)	Exclusion of women-led enterprises due to collateral requirements, gender bias among service providers, and limited business networks; reinforcement of existing gender inequalities in the forestry sector	Apply gender-sensitive eligibility criteria; provide targeted pre-application support to women-led enterprises; require the private sector service provider to report disaggregated data on enterprise participation by gender; set minimum targets for women-led enterprise financing	SBA, FDA, Private Sector Service Provider, GBV Specialists	Included in O&M budget
Operation and Maintenance	Investment promotion and PPP facilitation (Sub-component 3.3)	Community grievances from private sector conduct; inequitable distribution of investment benefits; adverse impacts on community land and resource rights from commercial operations	Embed social performance standards in PPP concession agreements; require private operators to implement stakeholder engagement plans and	FDA, NIC, Social Auditors	Included in O&M budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
			grievance mechanisms; conduct annual social compliance audits of PPP operators		
Operation and Maintenance	FDA grievance redress mechanism and whistleblower policy (Sub-component 1.2)	Inaccessibility of formal grievance channels to remote, illiterate, or marginalized community members; retaliation risks for whistleblowers	Design multi-channel grievance mechanisms including hotlines, community liaison officers, and written submission options in local languages; implement anti-retaliation protections for whistleblowers; conduct regular awareness campaigns on grievance processes	FDA, PIU, Civil Society Organizations	Included in O&M budget
OCCUPATIONAL HEALTH AND SAFETY					
Operation and Maintenance	OHS risks at FTI/SEC industrial processing operations	Chainsaw amputations, noise-induced hearing loss, sawdust inhalation, burns from kiln operations, and machinery entrapment among trainees and workers	Implement and maintain OHS Plan for all FTI/SEC processing operations; enforce machine guarding, lockout/tagout, and hearing protection; provide respiratory protection in sawdust environments; conduct quarterly OHS inspections; restrict access to certified operators only	FTI management; SEC operators;	Included in OHS inspection cost
DECOMMISSIONING PHASE					
ENVIRONMENTAL					
Decommissioning	Failure to rehabilitate temporarily disturbed construction and works areas	Construction sites, labor camps, access tracks, and temporary works areas not restored to pre-works environmental condition at	Require independent completion ESHS audits for all major construction contracts; verify rehabilitation	Contractors; PIU Environmental Specialist; independent third-party E&S	Included in completion audit cost

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		project closure, leaving degraded land and waste	through field inspection before project closure; retain contractor performance bonds to cover rehabilitation; document final rehabilitation status in completion audit reports	auditor	
Decommissioning	Residual hazardous waste disposal at project sites	Leftover lubricants, and e-waste from IT and processing equipment remaining on project sites without proper disposal	Conduct hazardous materials inventory at all sites before closure; arrange certified disposal through LACRA and EPA-approved channels for all residual chemicals; dispose of IT and processing equipment e-waste through certified recyclers; document disposal with certificates	Contractors; FDA IT; plantation operators; EPA	Included in hazardous waste disposal cost
SOCIAL					
Decommissioning	Cultural heritage site integrity at closure	Cultural heritage sites identified and managed during construction not verified for integrity before project handover	Conduct field verification of all recorded cultural heritage sites in PIU Cultural Heritage Register before project closure; engage community elders to confirm site status; document findings in completion audit report	PIU Environmental Specialist; PIU Social Specialist; MICAT	Included in completion audit budget
Decommissioning	Unresolved community grievances and outstanding commitments at closure	Unresolved land, livelihood, or compensation commitments remaining	Review and close all outstanding GM cases before project closure;	PIU Social Specialist; FDA Regional	Included in PIU operating budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
		open at closure and transferred without clear accountability to government systems	transfer unresolved cases to appropriate government bodies with full documentation; verify all compensation and RAP commitments are fulfilled before closure; conduct final community consultations to confirm no outstanding commitments	Foresters; Land Authority	
Decommissioning	Livelihood and income sustainability after project support ends	Community IGA subprojects, MSME enterprises, and CFMA operations losing viability or reverting to unsustainable practices once project technical and financial support is withdrawn	Design livelihood interventions with market linkage from inception; conduct 6-month post-closure beneficiary assessment to verify operational status; document exit strategy and transition plan for each CFMA and enterprise before closure; ensure CFMB financial management is independent before project closes	PIU Social Specialist; PI E&S Focal Points; FDA Extension Officers; M&E Specialist	Cost for post-closure beneficiary assessment
Decommissioning	Outstanding labor rights and final wage settlements	Workers not receiving final wage payments, outstanding entitlements, or close-out documentation particularly seasonal and community workers with informal arrangements	Verify final wage settlements for all worker categories before project closure; require contractors to submit final wage records and worker acknowledgement receipts before contract close-out; resolve all outstanding worker grievances;	Contractors; CFMB supervisors; PIU Social Specialist; independent labor auditor	Included in completion audit budget

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Phase	Activity	Potential Environmental and Social Risks and Impacts	Recommended Mitigation Measures	Responsibility (Implementation)	Indicative Budget (USD)
			document final LMP compliance in completion audit		
Decommissioning	Final E&S reporting and public disclosure	Failure to complete and publicly disclose final E&S performance documentation completion audit and final E&S Monitoring Report before project closure, undermining accountability and lessons learned	Commission independent final E&S completion audit; prepare final E&S Monitoring Report covering full project lifecycle; disclose both documents on FDA Public Portal and World Bank external website within 30 days of World Bank acknowledgement; submit to World Bank for final records	PIU Coordinator; PIU Environmental Specialist; independent auditor;	USD 20,000 for final completion audit and disclosure.



5.2 Special Assistance for Vulnerable PAPs

Disproportionately impacted groups who are mostly vulnerable due to their distinct livelihood strategies, ways of living and other socio-economic dynamics. For these individuals/ groups, in addition to resettlement, compensation and livelihood restoration programs, additional mitigation mechanisms are required. i.e. assistance in the compensation payment procedure, assistance in moving properties and identifying the resettlement plot (as needed), assistance in building activities, assistance during the post-resettlement period and health care if required, particularly during the moving and transition periods.

The project will be implemented across six counties Gbarpolu, Grand Cape Mount, Rivercess, Grand Bassa, Grand Gedeh, and Sinoe where forest-dependent communities are characterized by poverty, limited access to services, and significant concentrations of vulnerable populations including women, elderly persons, persons with disabilities, youth, indigenous and ethnic minority groups, and households headed by single women.

The Project will consider, but not limited to the following mechanisms.

- **Vulnerability-Sensitive Information and Awareness:** All project communication strategies will be designed to reach vulnerable groups who are most likely to be excluded from standard information channels. The project will conduct separate, dedicated Focus Group Discussions (FGDs) with women, elderly persons, PwDs, and youth prior to any activity that may affect resource access or land use. Information will be disseminated through multiple channels appropriate to the literacy levels and communication practices of rural forest communities in each county including community radio broadcasts in local languages visual aids, and in-person community liaison by social facilitators appointed by the project. All written project materials will be accompanied by simplified non-technical summaries, and FGDs with PwDs will use sign language interpreters and/or pictorial communication tools where required.
- **Assisted Compensation Procedures:** Vulnerable PAPs including elderly persons, persons with disabilities, and illiterate women will receive assistance from project recruited social facilitators throughout the compensation verification, documentation, and payment process. This assistance will include explanation of entitlements in local languages, assistance in compensation payment points, assistance in opening bank accounts or mobile money accounts where payments are made digitally, and independent verification that payments correspond to documented entitlements. No compensation will be disbursed to a vulnerable PAP without confirmation from the facilitator that the PAP understands the nature, basis, and amount of the payment. Special arrangements will be made for elderly and PwD PAPs in remote villages especially in Rivercess, Gbarpolu, and Grand Gedeh. A standalone RP has been prepared for the project.
- **Assistance in Property Movement and Resettlement Plot Identification:** Where project activities result in physical relocation most likely with rehabilitation and staff housing construction at GFNP and LPMR encroaching on settled plots, or in the context of CFMA boundary marking that restricts access to cultivated land, vulnerable PAPs will receive assistance in identifying and accessing replacement land and in physically moving household assets and structures. Given the age of elderly PAPs and the physical limitations of PwDs, the project will provide labor assistance for dismantling, transporting, and reconstructing structures where self-relocation is physically not feasible. To address this a standalone RP has been prepared for the project.
- **Assistance During Construction:** Where construction activities including patrol track rehabilitation/construction of staff office and housing works, CFMB office construction, and woodlot and plantation establishment take place in communities where vulnerable PAPs reside,



contractors will be required to implement specific mitigation measures protecting vulnerable community members. These include maintaining safe access routes to water, markets, and health facilities throughout construction; scheduling noisy or disruptive works to minimize impacts on elderly ensuring that construction sites are physically secured against unauthorized access by children; and providing first aid facilities accessible to community members in the event of construction-related incidents affecting non-workers. All contractors operating in the six project counties will incorporate these requirements in site-specific Health, Safety and Environment Plans submitted for project review before works commence.

- **Post-Resettlement Monitoring:** Following any resettlement or resource access restriction affecting vulnerable PAPs, the project will conduct quarterly monitoring visits carried out by the FDA/PIU and community liaison officers to assess whether the welfare of vulnerable PAPs has been restored to pre-project levels.
- **Inclusive Labor and Recruitment Practices:** All contractors and sub-contractors engaged under the project will be required to adopt transparent, non-discriminatory recruitment procedures as a contractual obligation enforced by the FDA-PIU. Specific measures will include: posting job announcements in local languages and through community radio in all six counties; communicating that women, persons with disabilities, and youth are encouraged to apply for all positions for which they are qualified; establishing written employment contracts for all project workers including community workers; incorporating ILO core labor standards into all contracts; prohibiting forced labor, child labor, and discriminatory dismissal; and maintaining separate anonymous grievance channels for workers belonging to vulnerable groups. Contractors to adapt the Labor Management Procedures (LMP) to ensure availability of clear recruitment protocols.
- **Engagement of CBOs and NGOs for Outreach to Vulnerable Groups:** Local civil society organizations with demonstrated presence in the six target counties may serve as community liaison partners for vulnerable PAP outreach. Priority will be given to organizations with existing programs targeting women, elderly persons, PwDs, and youth in forest communities including established women's cooperatives in Grand Cape Mount and Grand Bassa, disability rights organizations operating in Grand Gedeh and Rivercess. These organizations will be engaged through service agreements with the FDA/PIU and will be responsible for: identifying and registering vulnerable PAPs at community level; facilitating FGDs and ensuring vulnerable groups participate meaningfully in project consultations; supporting vulnerable PAPs in accessing GM channels; and reporting to the PIU on emerging vulnerability-related concerns during project implementation.
- **Grievance Mechanism Accessibility for Vulnerable Groups:** The project GM will be specifically designed to be accessible to vulnerable PAPs who face barriers to using standard complaint channels including illiteracy, physical immobility, distance from GM focal points, and fear of retaliation. Specific measures will include: establishment of community-level GM focal points in each project community (not only at county or district level); availability of verbal complaint registration for illiterate PAPs; availability of third-party complaint submission on behalf of a PAP by a trusted community member, CBO, or social facilitator; establishment of a dedicated confidential channel for GBV-related complaints that routes directly to the project GBV Specialist rather than through general community complaint registers; and quarterly public disclosure of anonymized GM case data disaggregated by gender, age, and type of grievance.

5.3 Citizens Engagement (CE) and Social Accountability (SA)

Citizen engagement is a central pillar of the Project and essential for developing strong forest governance outcomes. Consultations and participatory planning will identify concrete methods on how best to implement activities and ensure the active participation of communities in the Project. This



process will directly inform the CFMPs, ensuring the priorities of forest-dependent households including women, youth, and other vulnerable groups are reflected in local planning processes. The Project will ensure that youth and women are actively represented in community decision-making structures, including CFMBs. The Project will train community members in support of community-based monitoring and oversight of the quality and reach of Project activities. The community monitoring function will be formally incorporated into the Project's M&E system. The Project will also carry out regular satisfaction surveys, capturing community perspectives on interventions covering livelihoods, forest management, and service delivery. Findings will be systematically analyzed, used to improve implementation, and shared back with communities. Lastly, the Project will establish and operationalize a multi-channel, Project-level GM, building on systems developed under the Liberia Forest Sector Project.

Social accountability is captured across the proposed project activities as a cross-cutting mechanism to enable communities, civil society, and the public to hold the project actors to account for forest governance, revenue management, and conduct. Under Subcomponent 1.1, the project establishes the supply-side transparency infrastructure for social accountability through the public disclosure of all active concession agreements, license holders, and royalty payments via an open-data public dashboard; the publication of quarterly enforcement reports by the Wildlife Crime Task Force (Subcomponent 1.1); the development of an FDA Grievance Redress Mechanism and Whistleblower Policy (Subcomponent 1.2); and enhancements to the LiberTrace chain-of-custody system enabling independent verification of timber flows and revenues collectively creating the data and institutional foundation on which demand-side accountability by civil society and the public can be exercised. Under Component 2, Social accountability is operationalized at the community level through transparent CFMB governance structures with mandatory women's participation (Subcomponent 2.1), a community-based forest monitoring system enabling communities to independently verify forest cover changes and hold operators to account (Subcomponent 2.2(d)), and publicly disclosed Security Incident Registers and quarterly enforcement monitoring reports at GFNP and LPMR (Subcomponent 2.3) reinforced by LEITI concession disclosure requirements applicable to the project area. Under Component 3, Social accountability covers the private sector through the Forestry Market Intelligence and Investment Facilitation Platform's sector-specific investment grievance mechanisms and public-private dialogue (Subcomponent 3.3), and through the IFC Local Champion Program's requirement that participating firms meet IFC Environmental and Social performance standards. These Social accountability mechanisms cover the forest governance chain from national-level concession transparency through community-level monitoring to private sector accountability in which public information, independent verification, and accessible complaint channels reduce elite capture, corruption, and impunity across Liberia's forest sector.



6. Environmental and Social Monitoring

Environmental and social monitoring provides the means by which the project tracks the implementation and effectiveness of mitigation measures, identifies emerging risks, and enables adaptive management responses throughout the project cycle. Given the project's High environmental and social risk rating, its large and geographically dispersed footprint across six counties, the ecological sensitivity of the landscapes in which it operates including Gola Forest National Park and Lake Piso Multiple Use Reserve and the complexity of its community-facing interventions, a robust, well-resourced, and continuously operational monitoring system is essential to the project's environmental and social performance. E&S Monitoring under this ESMF provides the FDA PIU and government institutions with timely, information on whether mitigation measures are being implemented and are achieving their intended outcomes; it creates an accountability mechanism that enables the World Bank, government counterparts, communities, and civil society to independently verify project compliance with Environmental and Social Standards that are relevant to the project.

Effective monitoring requires dedicated human, financial, and institutional resources commensurate with the scale and complexity of the project's environmental and social risks. This chapter sets out the monitoring framework for the project, describing the monitoring objectives, parameters, methods, frequency, responsibilities, and indicative resource requirements across environmental, social, and OHS dimensions, as well as the reporting arrangements through which monitoring findings are communicated to FDA/PIU, the World Bank, and affected stakeholders throughout implementation.

The FDA/PIU will keep records of complaints received, resolved, accidents, and other environmentally or socially related topics of relevance and importance for this project. This data will be reflected in biannual reports on safeguard compliance to be furnished to the Bank. The Bank will conduct periodic audits of the projects and access documented information.

As per the commitment specified in the ESCP, any project-related fatalities or serious injuries will be reported to the World Bank within 48 hours after learning of the incident and in accordance with ESCP obligations and World Bank procedures. All employers under this project are therefore required to maintain insurance for workers and third-party liability. The monitoring indicators with verified indicators and responsible institutions are as in Table 14.

Table 13 describes broadly the Environmental and Social Monitoring Framework for the ESMF. A detailed Environmental and Social Monitoring Framework is captured in Appendix 7.

Table 13: Monitoring and Evaluation Framework for the ESMF

S / N	PHASE	INSTITUTION RESPONSIBLE	PERFORMANCE INDICATORS	METHOD OF MEASUREMENT	PERIOD TO BE CONDUCTED
1	PREPARATION/ PRE-CONSTRUCTION PHASE	FDA/PIU, FDA Regional entities /Independent consultant Monitoring by government entities (EPA, FDA/PIU and	Number/% of Staff/ Consultants/ Contractors/ and Engineers who received training on ESMF, ESMP, environmental, and social accountability/citizens engagement 143 (Consultations and participatory planning)	Training attendance registry and records log of all subprojects, indicating whether E&S screening and E&S instruments were conducted	Before commencement of any civil works and contractor mobilization to site



S / N	PHASE	INSTITUTION RESPONSIBLE	PERFORMANCE INDICATORS	METHOD OF MEASUREMENT	PERIOD TO BE CONDUCTED
		relevant government agencies)	training, Number of Subprojects with environmental and social screening checklist filled, reviewed and approved ESMP, and other site-specific plans including ESIA, RP, etc prepared. Establishment and functionality of GM.	GM logs, resolution tracking	
2	CONSTRUCTION PHASE	FDA/PIU, FDA Regional entities /Contractor/ Independent Consultant	Turbidity (NTU), Oil/Hydrocarbon Spills (mg/L or liters), Water Quality (pH units, mg/L), Underwater Noise (dB), Benthic Habitat Disturbance (Area (m²), Solid Waste Generation (kg or tons), Hazardous Waste (kg or liters), Dust (µg/m³ (PM10/PM2.5), Noise (dB), Soil Erosion Community Health and Safety, /Accident/Incident Reporting (Number of incidents), Traffic and Access (Number of disruptions), Grievance mechanism (GM) (Number of complaints resolved/pending) / SEA/SH (Number of cases, % workers trained), Worker Age Verification (% compliance), Stakeholder Engagement (Number of meetings, number of participants) Number/ % of Staff/ Consultants/ Contractors/ Engineers/ community representatives who received training144ESMP, environmental, social accountability training	Water sampling, turbidity meter, Water sampling (pH, DO, BOD, COD, heavy metals) Hydrophone, sound level meter, Remote sensing, Waste logs, dust monitor, Sound level meter, Visual inspection, Incident logs and surveys, Traffic counts, observation, GM logs, ID checks, Meeting logs, attendance records training attendance registry and records GM logs, resolution tracking Record attendance at	During civil works implementation



S / N	PHASE	INSTITUTION RESPONSIBLE	PERFORMANCE INDICATORS	METHOD OF MEASUREMENT	PERIOD TO BE CONDUCTED
			Grievance mechanism operational and effective (no. of grievances logged, revolved, pending, etc.) GRC established and operational. Contractor's staff sensitized Gender base violence (GBV). Number of Contractor staff who have signed CoC CESMP prepared and implemented by contractor Stakeholder consultations undertaken with project affected people. Standard operating procedures for best environmental practices established Waste management plan developed and implemented Emergency Response Plan prepared and implemented.	GBV sensitization sessions; GBV training statistics in contractor monthly reports. register of all contractor staff, with signed CoC forms existence of CESMP for each contract, with date of preparation and approval by PIU records of consultation events and reports implementation through site inspections and interviews existence of Waste Management Plan (WMP) Emergency Response Plan (ERP) is prepared/ regular drills and record participation	
3	OPERATION AND MAINTENANCE PHASE	Contractor The implementing agencies involved in the Project (FDA/PIU and relevant government agencies/FDA Regional entities)	Are environmental and social monitoring mechanisms in place such as energy usage, refrigerant inventory and leakage, e-waste volumes and emergency drills conducted? Is disaster and emergency mechanism in place? Training provided to E&S staff of relevant government agencies on ESMP implemented # of cases of traffic accidents ESMP measures being implemented. No. of complaints recorded, resolved, pending, from	utility meters installed at project sites or facilities. register of all refrigeration and air conditioning equipment, Implement and monitor an E-Waste Management Plan, log of all emergency drills conducted/report Periodic drills and records Traffic Incident Reporting Logs Grievance mechanism (GM) log	Operational and Maintenance phase to project closure



S / N	PHASE	INSTITUTION RESPONSIBLE	PERFORMANCE INDICATORS	METHOD OF MEASUREMENT	PERIOD TO BE CONDUCTED
			communities		
4	DECOMMISSIONING PHASE	The implementing agencies involved in the Project FDA/PIU / Contractor and relevant government agencies/ FDA Regional entities	Decommissioning plan been conducted. Disaster and emergency mechanism in place Standard operating procedures for best environmental practices established. # of complaints registered, resolved, referred, etc. from communities.	Existence of Decommissioning Plan Periodic drills and records Grievance mechanism (GM) log	During decommissioning of the project

6.1 Environmental and Social Monitoring Reporting Arrangements

The Environmental and Social Specialists of the FDA/PIU are responsible for conducting E&S monitoring of E&S implementation by construction contractors, including consultations and feedback from relevant stakeholders involved as per principles and requirements prescribed in the project's ESMF including RF, PF, LMP and SEP. Regular E&S monitoring and reporting requirements are summarized in Table 14.

Table 14: Environmental and Social Monitoring and Reporting Requirements

No	Report Prepared by	Submitted to	Frequency of Reporting
1	Contractors	FDA/PIU	Monthly on ESHS performance in accordance with the metrics specified in the respective bidding documents, contracts
2	Supervision consultant	FDA/PIU	Monthly on ESHS performance in accordance with the metrics specified in the respective bidding documents, contracts
3	Environmental and Social (GBV) Specialists and GM Officer in FDA/PIU	FDA/PIU	Monthly, as soon as possible, as required



4	FDA/PIU	WB	Quarterly reports, in line with the ESCP throughout Project implementation, starting with the Project Effective Date: This will include regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s) including those related to the resettlement and cases of Sexual Exploitation and Abuse, Sexual Harassment (SEA/SH) and Violence against Children (VAC). Number and status of resolution of incidents and accidents Bi-annually for M&E report
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In addition to the regular reporting schedule, in line with the ESCP, reporting arrangements are needed for serious incidents, causing death, injury, or other major problems. The FDA/PIU must notify the World Bank within 48 hours after becoming aware of the incident or accident, including the complete investigation form, complete Root Cause Analysis (proportionate to the severity of the incident), and undertake immediate mitigation measures as well as medium- and longer-term corrective actions to prevent the incident from recurring. See Appendix 13 for Sample Incident Form.



7. Environmental and Social Management Procedures and Implementation Arrangements

7.1 Environmental and Social Risk Management Procedures

To ensure environmental and social impacts and risks of sub-projects/activities under the project are properly screened and identified, risks should be managed and reported on, in line with ESS1 and the national laws. These requirements have been reflected in the LiFE-P Environmental and Social Commitment Plan (ESCP), which outlines necessary actions by the FDA/PIU to meet WBG environmental and social standards. The ESCP will be prepared and disclosed in country and on the World Bank external website prior to appraisal.

The environmental and social risk management procedures will be implemented through the Project's subproject selection process. In summary, the procedures aim to do the following:

7.2 Subproject Assessment and Analysis – E&S Screening

Screening is a key step for an initial identification of environmental and social (ES) risks and impacts of a project and is carried out at an early stage of any Environmental and Social Assessment (ESA) process. As a first step, all proposed activities at the National level and across the six target counties of Gbarpolu, Grand Cape Mount, Rivercess, Grand Bassa, Grand Gedeh, and Sinoe should be screened to ensure that they are within the project boundaries and are eligible for project support. Before any activity proceeds to detailed environmental and social assessment, the FDA/PIU will first apply the clearly defined set of eligibility and exclusion criteria listed in (Table 2 in Chapter 2). All enforcement-related activities under Sub-component 2.3 will be subject to the following enforcement screening process before any implementation begins.

Site Selection and Screening Process: The PIU/FDA will follow the procedures and technical criteria outlined in their respective Operations Manuals to identify and select sites for investments, and selection will be made in consultation with communities in the respective locations. Site selection will be subject to compliance with the Project's Environmental and Social Framework (ESF), including the applicable Environmental and Social Standards (ESSs), as well as a clearly defined set of eligibility and exclusion criteria listed in Table 2 in Chapter 2.

Third-Party Due Diligence: The Project will engage an independent third party to verify that the proposed long list of sites meets World Bank E&S requirements.

Only activities that pass the Exclusion List screening will proceed to the next step where the FDA/PIU will use the Screening Form in Appendix 1 to identify and assess the nature, scale, and significance of potential environmental and social risks and impacts and identify the appropriate mitigation measures for the subproject and assessment instruments required for the specific activity. The Screening Form lists the various mitigation measures and plans that may be relevant for the specific project activities (such as, the Environmental and Social Impact Assessment including an Environmental and Social Management Plan, and a Biodiversity Management Plan. In addition, the FDA/PIU should identify the documentation, permits, and clearances required by the Environmental Regulation of the Environment Protection Agency of the Republic of Liberia.



7.3 Subproject Formulation and Planning – E&S Planning

Based on the process above and the Screening Form (Appendix 1), the FDA/PIU will adopt the necessary environmental and social management measures already included in the Annexes of this ESMF and will be a mandatory part of construction contract or bidding documents or develop relevant site-specific environmental and social management plans (Appendix 3 and 5).

The consultants engaged by the FDA/PIU will prepare the ESIA/ESMPs, and other applicable documents as needed. The FDA/PIU will provide approval and compile ESIA/ESMPs and other applicable forms. The contents of the ESIA/ESMPs will be shared with relevant stakeholders in an accessible manner, and consultations will be held with the affected communities on environmental and social risks and mitigation measures. The ESIA/ESMPs must be cleared by the World Bank before procurement or civil work begins. If certain subprojects or contracts are being initiated at the same time or within a certain location, an overall ESMP covering multiple subprojects or contracts can be prepared.

The FDA/PIU will also complete the documentation, permits and clearances required under the government's Environmental Regulation before any project activities begin. Staff who will be working on the various subproject activities should be trained in the environmental and social management plans relevant to the activities they work on. The FDA/PIU should provide such training for field staff.

The FDA/PIU should also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures for civil work. The FDA/PIU should provide training to selected contractors to ensure that they understand and incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by contractors to subcontractors and vendors. The FDA/PIU should further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

7.3.1 Environmental and Social Instruments

The project will conduct a Strategic Environmental and Social Assessment (SESA) of the legal, regulatory, and institutional reforms supported under Component 1, and disclose the SESA within 12 months after the Project's Effective Date. The SESA report will be consulted upon and should be publicly disclosed in country and the World Bank external website.

For subproject activities, based on the results of the environmental and social screening, FDA/PIU may be required to prepare site-specific instruments such as Environmental and Social Impact Assessments (ESIAs) (Appendix 3), Environmental and Social Management Plans (ESMPs) (Appendix 5), Biodiversity Management Plans (BMPs) (Appendix 8). These instruments shall be prepared, consulted upon, and disclosed prior to the implementation of the specific activity for which they are required. In addition, other specific Environmental and Social (E&S) management plans may be prepared, as necessary, in line with the applicable Environmental and Social Standards (ESSs) such as Resettlement Plan, ii) Process Framework (standalone instruments prepared by project appraisal), and iii) Community Health and Safety Plan (CHS) (Appendix 10), Biodiversity management plan (BMP) (Appendix 8) Occupational Health and Safety (OHS) Plans (Appendix 14), Waste Management Plans (Appendix 9), Traffic Management Plans (Appendix 22).



The FDA/PIU shall carry out an appropriate ESA to assess the risks and impacts of the project activities throughout the project life cycle. The ESA shall be proportionate to the nature and significance of such risks and impacts. It will be conducted pursuant to the Liberia Environmental Protection Agency Act (2003) and applicable national requirements and shall meet the ESS requirements as stated in the ESF. Sample TORs for the preparation of an ESIA and ESMP are contained in Appendix 3 and 5 respectively.

7.4 Implementation and Monitoring – E&S Implementation

During implementation, FDA/PIU will ensure that the approved site-specific E&S instruments will be included as part of the bidding documents and contract conditions to ensure that environmental and social obligations are contractually binding on contractors. In addition, it should be required that each contractor prepare a Contractor Environmental and Social Management Plan (C-ESMP) (See Appendix 21-Sample Outline of Contractor ESMP), consistent with the approved ESMP and relevant E&S instruments, prior to the start of any site activities.

The FDA/PIU will conduct regular monitoring visits. The FDA/PIU working to implement the project will ensure that monitoring practices include the environmental and social risks identified in the ESMF and will monitor the implementation of E&S risk management mitigation plans as part of regular project monitoring.

At a minimum, the reporting will include (i) the overall implementation of E&S risk management instruments and measures, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP. Reports from the local council levels will be submitted to the FDA/PIU at the national level, where they will be aggregated and submitted to the World Bank on a quarterly basis.

Throughout the Project implementation stage, the FDA/PIU will continue to provide training and awareness raising relevant stakeholders, such as staff, selected contractors, and communities, to support the implementation of environmental and social risk management mitigation measures.

The FDA/PIU will also track grievances/beneficiary feedback (in line with the SEP) during project implementation to be used as a monitoring tool for implementation of project activities and environmental and social mitigation measures.

If FDA/PIU becomes aware of a serious incident in connection with the project, which may have significant adverse effects on the environment, the affected communities, the public, or workers, it should notify the World Bank 48 hours after learning about the incident or accident and provide available details upon request in line with the ESCP.

7.5 Review and Evaluation - E&S Completion

Upon completion of Project activities, the FDA/PIU will hire an independent Third-Party Monitoring (TPM) consultant (firm) to review and evaluate progress and completion of project activities, and all required environmental and social mitigation measures (including the LMP, PF, SMP, RP, LRP, SEP, GBV/SEA Action plan). Especially for civil work, the independent TPM will monitor activities with regard



to site restoration and landscaping in the affected areas to ensure that the activities are done to an appropriate and acceptable standard before closing the contracts, in accordance with measures identified in the ESMPs and other plans. The sites must be restored to at least the same condition and standard that existed prior to commencement of works. Non-compliance issues must be closed out before final payment or contract closure. The independent TPM will prepare the completion report describing the final status of compliance with the E&S risk management measures and submit it to the World Bank.

7.6 Technical Assistance Activities

Component 3 of the project will strengthen forestry MSMEs through technical assistance and access to finance. Targeted technical assistance will also be provided to further strengthen both public and private stakeholders in implementing these structures effectively.

In accordance with the ESCP, the FDA/PIU will ensure that the consultancies, studies (including technical feasibility studies), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the World Bank and that are consistent with the ESSs and comply with the terms of reference.

7.7 Implementation Arrangements

The Forestry Development Authority (FDA) will serve as the lead implementing agency for the Liberia Forest Economy Project (LIFE-P), with overall responsibility for project coordination and implementation across all components

A PIU will be established within FDA, reporting to the FDA Managing Director. A dedicated Project Implementation Unit (PIU) will be established within the FDA and will report directly to the FDA Managing Director. The PIU will be responsible for day-to-day project coordination and management, including fiduciary oversight, environmental and social compliance, monitoring and evaluation, stakeholder engagement, and coordination with partner institutions. The PIU will be staffed with: (i) Project Coordinator; (ii) Fiduciary experts (Procurement Specialist and Financial Management Specialist); (iii) Environmental, Social, Gender-based violence Specialist(s) and a GM Officer; (iv) Monitoring and Evaluation Specialist; and (v) Communications and Stakeholder Engagement Expert. Clear roles, responsibilities, and reporting lines will be defined through standardized operating procedures (SOPs), with periodic joint supervision to maintain feedback loops from field to center. To ensure implementation readiness, the FDA will initiate PIU recruitment prior to project effectiveness. Any additional staff must be recruited no later than three months after project effectiveness. To strengthen technical coordination and implementation oversight, a Project Management Team (PMT), composed of technical managers from the FDA's Conservation, Community, Commercial, and Research and Development Departments, will support the PIU across all project components. The PMT will provide technical guidance, facilitate coordination across FDA departments, and ensure alignment between project activities and broader sector priorities.

Activities having an environmental footprint shall obtain an Environmental Impact Assessment (EIA) license to start work. There are mechanisms in place to ensure compliance. The EPA has developed an environmental regulation through the Bank's support and has benefitted from training on the ESF. There is familiarity with the Bank's ESF.



The ESMF implementation will involve the following roles and responsibilities and provides details by relevant parties during project implementation. Table 15 show the implementation arrangements for the ESMF. Figure 28 is a schematic representation of the institutional/implementation arrangements of the ESMF/ESMP/LMP.

Table 15: Implementation Arrangements

Level/ Responsible Party	Roles and Responsibilities
FDA/PIU	• Ensure project activities do not fall under the Environmental and Social Exclusion List (e.g projects through legally protected areas, Ramsar sites, or critical habitats, construction or trenching in areas of high biodiversity value or designated conservation zones, activities that would result in irreversible loss or fragmentation of sensitive ecosystems.) Fill out Screening Forms (Appendix 1) for relevant subproject activities • Supervise and monitor the environmental and social risk management system and activities of the private sector actors. • Oversee daily implementation and monitoring of environmental and social mitigation measures and report progress and performance monthly. • Provide training to local contractors and communities on relevant environmental and social mitigation measures, roles, and responsibilities. • If contracting is managed regionally, ensure that all bidding and contract documents include all relevant E&S management provisions per screening forms, ESMPs, and ESCOPs. • Planning and implementation of ESMP • Ensuring that the social and environmental protection and mitigation measures in the ESMP are incorporated in the Construction Environmental and Social Management Plan (CESMP) • Ensuring that the Construction Supervision Consultant commits and retains dedicated staff as social and environmental managers to oversee C-ESMP implementation • Supervision and monitoring of the progress of activities of the consultants and contractors for the implementation of different components of ESMP • Provide guidance to Construction Supervision Consultant and contractors in conducting subsequent monitoring and reporting and in undertaking corrective options • Responsible for modifications to the ESMP when unforeseen changes are observed during implementation. • Ensure submission of periodical environmental and social management and monitoring reports to the steering committee and the World Bank. • Promote improved social and environmental and social performance through the effective use of management systems. • External communications with other implementing partners, government ministries and agencies, and non-government organizations on the matters related to environmental and social management under the project.
Construction Supervision Consultant	• Directly responsible for contract administration and day-to-day project supervision including environmental and social management. • The Construction Supervision Consultant will consist of an environmental and social unit that will advise the FDA/PIU on ESMP implementation and monitor the work of the contractors in the field. • Engage environment and social specialists and GM Officer to ensure proper implementation of ESMP provisions. • Undertake regular monitoring of the contractor's environmental performance, as scheduled in the ESMP. • Conduct periodical environmental audits.



	• Prior to construction, review and approve C-ESMPs/method statements prepared by the contractors. • Supervise site environmental management system of the contractors and provide corrective instructions. • Monitor the implementation of the C-ESMP and review the environmental management and monitoring reports prepared by the contractor. • Review and report on C-ESMP implementation by the contractor. • prepare quarterly progress reports
Contractors/Sub-Contractors (National/Sub-National level)	• Comply with the Project's environmental and social mitigation and management measures as specified in ESMPs, ESCOPs, and contract documents, as well as national and local legislation. • Take all necessary measures to protect the health and safety of workers and community members, and avoid, minimize, or mitigate any environmental harm resulting from project activities. • Evaluate and review the ESMP developed from the main ESIA process and internalize the provisions for implementation based on the realities of the project. • Customize the project ESMP and generate a Contractor Environmental and Social Management Plan (C-ESMP), and other method statements and management plans according to requirements of ESMP and get them approved by Construction Supervision Consultant. • Procure necessary equipment for environment measurements or engage an appropriate expert personnel member for the activity in specific environment quality aspects including air quality, noise, water, and soil quality, • Recruit qualified environmental and social safety officers to ensure compliance with environmental and social contractual obligations and proper implementation of CESMP. Provide sufficient funding and human resources for proper implementation of CESMP; and • Prepare monthly reports related to environmental and social management and monitoring for review and verification by the Construction Supervision Consultant.

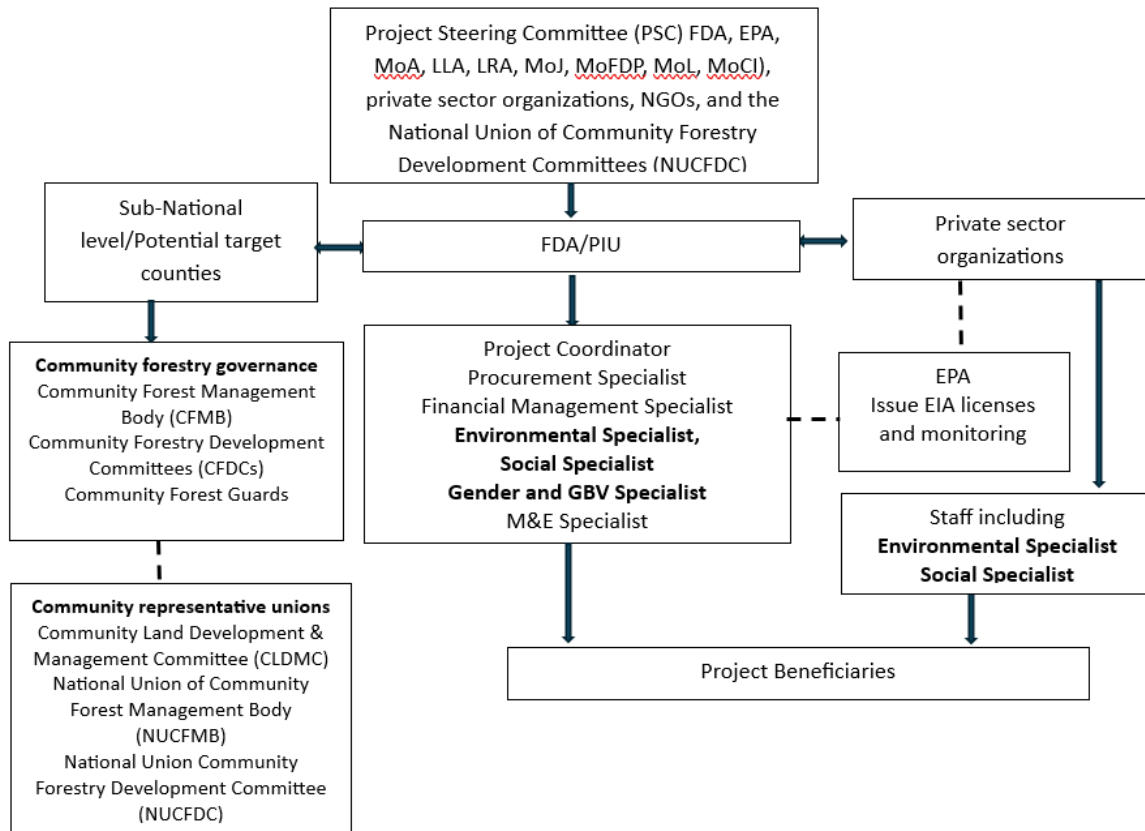


Figure 30: Schematic representation of the institutional/implementation arrangements of the ESMF/ESMP/LMP

7.8 Proposed Training and Capacity Building

7.8.1 Capacity Assessment

The Forestry Development Authority (FDA), as the lead implementing agency, has gained valuable experience for managing E&S risks through prior WB-financed operations under the Safeguard Policies. Under the closed Liberia Forest Sector Project (P154114), the FDA operationalized several core systems—including a REDD+ safeguards information system, functioning grievance mechanism, and piloted community forestry structures—that demonstrate growing organizational capability and field presence. These experiences provide a foundation for transitioning to the Environmental and Social Framework (ESF). Capacity constraints are evident in the form of insufficient E&S staffing and training, as well as limited technological and financial resources for effective monitoring of E&S implementation and enforcement of compliance. To address these challenges, the Project Implementation Unit will be equipped with dedicated environmental specialist, social specialist, gender based violence specialist and a GM Officer. These specialists will be supported by resources specifically allocated for E&S risk management and the operation of the Grievance mechanism (GM). Given the FDA's decentralized footprint and frequent engagement at the community interface, institutional arrangements for E&S management will be reinforced through clearly defined roles and responsibilities, trained staff, practical operational tools, and targeted mentoring for regional staff, in line with ESF guidance.



Institutions involved have some E&S risk management experience from previous projects but require systematic ESF institutional capacity assessment, including gender aspects and proportionate capacity building plans (human resource, soft skills training, and logistics).

Successful implementation of the Project will depend, among others, on the effective implementation of the environmental and social risk management measures outlined in this ESMF. Training and capacity building will be necessary for the key stakeholders in order to ensure effective implementation of the ESMF, LMP, RF, PF, SEA/SH, SEP, and other environmental and social documents. An initial training approach is outlined in the table below. To the extent possible, training on environmental and social risk management will be integrated into the project cycle and operational procedures. Table 16 presents the proposed training and capacity building approach with an estimated budget of One Hundred and Fifteen thousand United States Dollars only **US\$ 115,000**.

Table 16: Proposed Training and Capacity Building Approach

Training Required	Who to train	Responsible Party	Budget (US\$)
World Bank ESF and ESSs certification	FDA/PIU, FDA Regional entities	Ghana ESF Center of Excellence	10,000
Deep dive training on resettlement and ESF	FDA/PIU, FDA Regional entities	Ghana ESF Center of Excellence	10,000
OHS Management	FDA/PIU, FDA Regional entities	Ghana ESF Center of Excellence	10,000
Environmental and Social Risk Management Instruments disclosure	FDA/PIU, FDA Regional entities	FDA/PIU	5,000
Training themes • Project E&S Screening • GBV/SEA/SH and accountability framework awareness, monitoring, and reporting • OHS Management/ESMP Training for Contractors • Waste Management/Hazardous material management • Emergency Preparedness and Response • Security Risk and Awareness • Forestry and Biodiversity Management • Chance finds procedures • Incident investigation and reporting • E&S monitoring and reporting • Grievance mechanism • Stakeholder engagement and project communications • Deep dive training on resettlement and ESF. • SEA/SH Sensitization, monitoring and reporting • Contractor environmental and social	FDA/PIU, FDA Regional entities	FDA/PIU supported by consultants as necessary for one year	20,000
	FDA/PIU, FDA Regional entities/Contractors/sub-contractors	Refresher year 2	10,000
		Refresher year 3	10,000
		Refresher year 4	10,000
		Refresher year 5	10,000
	155		



Training Required	Who to train	Responsible Party	Budget (US\$)
management			
Environmental, Social, resettlement and OHS audit (midterm of the project and end of the project)	FDA/PIU, FDA Regional entities	FDA/PIU	10,000
Climate risks and disaster preparedness	FDA/PIU, FDA Regional entities	FDA/PIU supported by consultants as necessary	10,000
Total			115,000

N.B. Project resources should be available to train E&S staff. Budget will not include salaries of staff.

7.9 Estimated Budget

It is estimated that a total amount of Two million seven hundred seventy-seven thousand two hundred fifty United States Dollars (**US\$ 2,777,250**) will be required to implement activities identified in the ESMF. The project will allocate budget for the preparation of instruments, such as ESIA, ESMP, RP and other site-specific instruments as required. Table 17 lists estimated cost items for the implementation for the ESMF, which have been included in the overall project budget.

Table 17: ESMF Implementation Budget

No	Activity	Unit	Quantity	Indicative Cost (US\$)
1	ESMF&LMP/RF/PF/SMP including ESCP Disclosure and dissemination	Document	5	10,000
2	Capacity Building and Training Program (presented in table 14)	Year	5	115,000
3	Engagement of a consultant to prepare a Strategic Environmental and Social Assessment (SESA) and disclosure	Per SESA	1	50,000
4	Environmental and social screening of all sub-projects/Third-Party Due Diligence	Per sub-project	30	70,000
5	Preparation of subproject site-specific ESIA/ESMPs other site-specific plans and disclosure of instruments.	Per ESIA/ESMP	10	1,000,000
6	Preparation of Biodiversity Management Plans (BMPs) specifically for activities within or adjacent to GFNP (Grand Cape Mount, Gbarpolu) and LPMR (Grand Cape Mount)	Per BMP	2	80,000
7	Preparation of site-specific Resettlement Plans (RPs), other site-specific plans and disclosure	Per RP 156	5	650,000

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8	RP implementation consultancy	Per RP	5	100,000
9	Implementation of the GBV/SEA/SH Action Plan and accountability framework	Lump sum	1	50,000
10	Licenses and permits	Per year	5	50,000
11	Environmental and social monitoring and reporting- all 6 counties, all active sub-project sites	Per year	5	150,000
12	Preparation of Grievance mechanism (GM) Manual	Lump sum	1	30,000
13	GM operational costs and quarterly reporting	Per year	5	80,000
14	GBV service provider engagement - community-level GBV prevention training, survivor referral and response, quarterly reporting to PIU	Per year	5	50,000
15	Consultation of stakeholders (National and all 6 counties)	Per year	5	80,000
16	Independent Environmental and Social Audit (Mid-term and Disclosure)	Mid-term	1	40,000
17	Independent Environmental and Social Audit by Project Completion	Completion	1	40,000
	Contingency (5%)			132,250
	TOTAL			2,777,250



8. Stakeholder Engagement, Disclosure, and Consultations

A separate Stakeholder Engagement Plan (SEP) has been prepared for the Project, based on the World Bank's Environmental and Social Standard 10 (ESS 10) on Stakeholder Engagement. The SEP once disclosed (prior to appraisal) will be available on the FDA website and WB external website.

This ESMF, with annexes on LMP has been disclosed in draft form on the stated websites. Key feedback, if any, on the disclosed ESMF is listed here.

8.1. Stakeholder Consultation Undertaken During Project Preparation and E&S Instruments

Stakeholder consultations were undertaken for the LiFE-P. The subsections below capture summarized findings from these stakeholder engagement activities. It had the following objectives: (i) Consult key people, the FDA/PIU, as well as other key partners and stakeholders to inform about the preparation of the proposed program; (ii) Discuss the preliminary content of the LiFE-P, solicit stakeholder inputs and fill requisite gaps; (iii) Present the program preparation timeline.

8.1.1 Preparatory Missions

As part of the project preparation, a World Bank (WB) preparation mission took place in Monrovia from September 29 to October 9, 2025, and from February 9-13, 2026. The meeting involved the FDA/PIU and officials of FDA. It had the following objectives: to ensure key aspects of the project design are covered including discussions on the Environmental and Social aspects of the project and to go over the key documents, including project component description, the ESCP, and schedule for stakeholder consultations for the ESF instruments in Liberia. Questionnaires for the ESMF and LMP were shared with the FDA/PIU, including the E&S focal points, to gather responses on the E&S aspects of the project at the national and sub-national levels.

8.1.2 Key feedback from Stakeholder Consultation during E&S Instruments Preparation

Stakeholder engagements during the E&S instruments preparation were held virtually with Government and regulatory agencies on March 24, 2026, and with NGOs and the private sector on March 25, 2026. Field visits and consultations were held at the sub-national level between March 31- April 15, 2026, co- led by the FDA/PIU. The consultations had the following objectives: (i) consult key relevant institutions, the FDA, as well as other stakeholders to inform about the preparation of the proposed project; (ii) discuss the preliminary content of the LiFE-P, solicit stakeholder inputs and fill requisite gaps. (Table 18. Feedback from Stakeholder Consultations at the National and Sub-national level). The project has considered the stakeholder feedback received during consultations conducted as part of project preparation. The inputs, concerns, and recommendations raised by communities, civil society organizations, government agencies, and other stakeholders have informed the design of key project components. Stakeholder engagement is a continuous and iterative process that will be sustained throughout the entire project cycle, from preparation through implementation and closure.



Table 18: Feedback from Stakeholder Consultation

No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
1	March 24, 2026	Government and Regulatory Institutions ²⁸ Total number of participants: 26 Sex disaggregated: Male: 24 Female: 2	The Forestry Development Authority (FDA), with World Bank support, convened a stakeholder consultation with Government of Liberia Ministries, Agencies, and Commissions (MACs) as part of the preparation of the Liberia Forest Economy Project (LiFE). The consultation aimed to present the project design and Environmental and Social Framework (ESF) requirements, introduce the three livelihood intervention components, clarify institutional roles, and collect feedback to strengthen project design and safeguard instruments. The consultation generated strong institutional support for LiFE's objectives and produced a set of concrete recommendations on coordination, ESF compliance, land governance, SEA/SH/GBV risk mitigation, enforcement, and inclusive participation. The project team presented LiFE's structure and objectives, covering its three pillars of forest governance strengthening, sustainable forest management, and livelihood enhancement. The ESF presentation introduced all ten Environmental and Social Standards (ESS1–ESS10), with particular emphasis on assessment and risk management (ESS1), labor and working conditions (ESS2), community health and safety (ESS4), land acquisition and involuntary resettlement (ESS5), biodiversity conservation (ESS6), and stakeholder engagement (ESS10). Participants highlighted four cross-cutting ESF implementation concerns: the need to strengthen	The consultation aimed to present the project design, outline Environmental and Social Framework (ESF) requirements, and introduce the three livelihood components: Commercial Forest Activities, Community Forest Management Activities, and Conservation Activities. Commercial Forest Activities The project will support sustainable timber production, value chain development, private sector investment, and the promotion of legal and traceable forest products through strengthened concession governance. MACs emphasized the need to strengthen monitoring systems to prevent illegal logging and timber production and called for enhanced revenue transparency mechanisms to ensure that fiscal flows from commercial forestry are publicly disclosed and accurately tracked. Community-Based Activities The project will support the establishment of Community Forest Management Areas (CFMAs), development of local enterprises and cooperatives, agroforestry and climate-smart agriculture, and skills development	The consultation demonstrated strong inter-agency commitment to the Liberia Forest Economy Project. Stakeholders endorsed the project's integrated approach combining commercial forestry, community development, and conservation. Key recommendations focused on strengthening coordination, ensuring ESF compliance, addressing land and security risks, and promoting inclusive participation. Governance and coordination: Establish a formal inter-agency coordination platform with clear TORs, defined roles, and regular reporting to manage ESF compliance across institutions. ESF compliance capacity: Incorporate dedicated capacity-building programs for FDA and MAC counterparts on ESF instruments, monitoring, and reporting obligations. Integrate forest fire prevention

²⁸ Liberia National Police (LNP), Liberia Immigration Service (LIS), Ministry of Justice (MoJ), National Bureau of Concessions (NBC), Liberia Revenue Authority (LRA), Liberia Institute of Statistics and Geo-Information Services LISGIS), Ministry of Gender, Children and Social Protection (MGCSP), Ministry of Local Government (Formerly Ministry of Internal Affairs-MIA), Ministry of Labor (MoL), Cooperative Development Agency (CDA), Liberia National Fire Service (LNFS), National Investment Commission (NIC), Ministry of Commerce and Industry (MoCI), Liberia Extractive Industries Transparency Initiative (LEITI)

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No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			institutional capacity across MACs for meaningful ESF compliance; the importance of integrating SEA/SH and GBV risk mitigation into project design from the outset; the requirement for functional and accessible Grievance mechanisms (GM) at both community and institutional levels; and the need to align project instruments with national environmental regulations administered by the Environmental Protection Agency (EPA) Act 2018, and robust GM systems were identified as the primary response mechanisms. Security risks: Illegal mining and logging activities in target landscapes pose security risks for project workers and communities. Participants called for strengthened inter-agency collaboration between FDA, LNP, and the Ministry of Justice to address these risks through coordinated joint enforcement mechanisms. Gender and social inclusion: The Ministry of Gender, Children and Social Protection emphasized the need for a dedicated GBV Action Plan covering awareness, confidential reporting, and survivor-centered support. Ensuring gender-sensitive targeting and meaningful participation of women and vulnerable groups across all three livelihood components was identified as a priority.	for women and youth. MACs stressed the importance of ensuring inclusive and meaningful participation of women and vulnerable groups, and recommended strengthening local governance structures in coordination with the Ministry of Local Government to underpin community forest management arrangements. Conservation Activities The project will support protection and restoration of forest ecosystems, biodiversity conservation and protected area management, and alternative income streams linked to conservation, including ecotourism and NTFP development. MACs recommended strengthening enforcement through joint operations with the Liberia National Police (LNP) and Ministry of Justice, and called for integration of spatial data and monitoring systems through the Liberia Institute of Statistics and Geo-Information Services (LISGIS) to support evidence-based conservation management. The PIU confirmed that the LMP will cover all categories of workers direct FDA staff, contracted workers, community workers, and primary supply chain workers and will enforce labor standards and OHS measures across all project activities. A standalone GBV/SEA/SH Action Plan will be developed and integrated into the LMP and GM. Anonymous reporting mechanisms will be incorporated into the FGM design as a	and response systems into ESMF activity-specific provisions Livelihood development: Expand and operationalize all three livelihood pathways: commercial, community, and conservation with adequate targeting mechanisms for women, youth, and vulnerable groups. Gender and social inclusion: Develop and implement a standalone GBV/SEA/SH Action Plan with confidential, survivor-centered reporting mechanisms integrated into the GM. Data and monitoring: Develop an integrated data platform linking FDA, LISGIS, EPA, and other MACs to support planning, compliance monitoring, and adaptive management. Strengthen joint enforcement mechanisms against illegal logging and mining through structured collaboration with LNP and Ministry of Justice, FDA, LNP, Ministry of Justice.

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No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			Labor Standards and GBV/SEA/SH): The Ministry of Labor confirmed that LMP will be required to govern all labor and working conditions under LiFE-P, covering both direct and contracted workers. The Ministry emphasized the need to enforce labor standards and occupational safety measures including child labor prohibitions with clear penalties across commercial forestry operations, community-based activities, and infrastructure construction. The Ministry of Gender, Children and Social Protection called for a dedicated GBV/SEA/SH Action Plan covering awareness, confidential reporting, and survivor-centered support mechanisms, noting that gender-based risks in forest sector operations particularly involving male-dominated workforces in remote areas require proactive and structured management. The Ministry emphasized that GBV/SEA/SH provisions must be integrated into the LMP and linked to the GM.. Multiple MACs emphasized the need for inclusive and meaningful participation of women and vulnerable groups across all three livelihood components, including in paid labor opportunities.	standard feature. The PIU noted that LMP provisions will explicitly address child labor prohibitions, penalties, and institutional escalation pathways consistent with Liberia labor law. Joint enforcement collaboration with LNP and the Ministry of Justice will be incorporated into the LMP's community health and safety provisions to address security risks for workers in project areas	Develop and implement a standalone GBV/SEA/SH Action Plan with confidential, survivor-centered reporting mechanisms integrated into the GM — FDA, Ministry of Gender, Children and Social Protection; Enforce labor standards and OHS measures across all project activities in coordination with the Ministry of Labor - FDA, Ministry of Labor; Incorporate anonymous reporting options and suggestion boxes into FGM design Establish clear institutional processes and escalation pathways for child labor violations consistent with Liberia labor law; Ensure gender-sensitive targeting and meaningful participation of women and vulnerable groups in paid labor opportunities across all three livelihood components FDA, Ministry of Gender; Strengthen joint enforcement mechanisms against illegal logging and mining to protect worker safety -FDA, LNP, Ministry of Justice; Establish M&E indicators for vulnerable groups including

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No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
					women, youth, and persons with disabilities linked to LMP labor compliance monitoring
	March 25, 2026	Non-Governmental Organization/Civil Society Organization (NGO/CSO) and Private Sector Total number of participants: 25 Sex disaggregated: Male: 19 Female: 6	Participants were briefed on the legal and institutional prerequisites for project effectiveness. All required environmental and social documents must be prepared prior to project appraisal, with ongoing consultation with the World Bank's consultants. Compliance with Liberian labor law including child labor prohibitions and associated penalties was emphasized. Institutional coordination arrangements were discussed, including the roles of the District Council, local chiefs, women's groups, relevant line ministries (including the Ministry of Gender), and the PIU in project governance and oversight. The consultation discussed the project's approach to community engagement and the design of Feedback and Grievance mechanisms (FGMs). Counties in the project area are clustered into two regions for phased initial engagement, with sessions involving district commissioners, council members, chiefs, women's groups, and vulnerable populations. Separate, confidential sessions are being planned for sensitive topics including sexual exploitation and abuse. FGMs are being established at community level, with Grievance Redress Committees (GRCs) trained to receive, manage, and escalate complaints. The Project Implementation Unit (PIU) staffed independently of FDA operational departments will maintain overall oversight of grievance management. A key concern raised by participants was the reluctance of community members to report grievances due to fear of identification. In response, the team committed to incorporating anonymous reporting options, including suggestion boxes, into the FGM design. Escalation pathways for serious violations, including direct communication channels to the World Bank, were confirmed.	Maxwell Borbor presented the World Bank's Environmental and Social Standards (ESS) framework and the project-specific instruments being developed. Key points included: LiFE is by the relevant ESSs of the ESF covering assessment, labor, pollution prevention, community health and safety, land acquisition, biodiversity, indigenous peoples, and cultural heritage. A Stakeholder Engagement Plan (SEP) is being developed to identify all affected and interested parties and ensure inclusive, barrier-free participation, including for vulnerable populations. Resettlement and Process Frameworks have been drafted to guide any land acquisition, access restriction, and community participation processes. An Institutional Assessment is underway to evaluate FDA's capacity to manage E&S risks and identify targeted capacity-building measures. Specific action plans are being developed to address SEA/SH risks, including confidential reporting channels and survivor-centered support mechanisms.	Arrange visits by 2–3 FDA staff to countries implementing CFMA clustering to gather lessons learned Incorporate anonymous reporting option (including suggestion boxes) into FGM design Establish M&E framework with specific indicators for vulnerable group livelihood support Advocate for increased budget allocation for ecotourism development, and infrastructure

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No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			Participants discussed strategies for ensuring long-term project sustainability. Revenue generation pathways identified include park entry fees, ecotourism PPP investment, and sales of locally produced forest goods under ecotourism models at Gola Forest National Park and Lake Piso Multiple Use Reserve. Community protection funds deposited directly to communities were highlighted as a mechanism to incentivize local stewardship and reduce dependence on external enforcement. Direct and indirect job creation was noted as an expected outcome across tourism, supply chains, and agroforestry. GM, Worker Grievances, and Enforcement): The PIU presented the FGM design, noting that counties are clustered into two regions for initial engagement, with separate consultation sessions for sensitive topics such as SEA/SH. A key challenge identified was the reluctance of workers and community members to report grievances due to lack of anonymity. The PIU recommended incorporating anonymous reporting options and physical suggestion boxes to encourage participation. The PIU was identified as the primary body responsible for managing grievances, with GRCs established and trained at community level. The importance of non-project staff involvement in GRCs was emphasized to ensure independence and effectiveness. Legal compliance obligations including penalties for child labor violations were outlined, with the need for clear institutional processes and escalation pathways confirmed. Illegal logging and mining activities in project areas were noted as posing security risks for project workers, requiring coordinated enforcement responses linked to the LMP's community health and safety provisions.		
	April 2, 2026	FDA Technical Managers Commercial	Stakeholders raised issues relevant to ESMF design across multiple thematic areas: (a) Community Forest Clustering: The strategy of merging smaller,	The PIU confirmed that the ESMF will incorporate provisions for cluster mapping, buffer zone management,	Share current cluster map with for review and integration into ESMF spatial planning

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No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
		Community and Conservation Units Total number of participants: 11 Sex disaggregated: Male: 8 Female: 3	commercially non-viable community forests (ranging from 10,000–20,000 ha) into larger investor-attractive clusters was discussed. Stakeholders debated whether to use existing clusters such as Zuza and Basa which have established boundaries but are small and of limited commercial viability or establish new ones. It was agreed that spatial planning, including cluster maps and buffer zone demarcation, is critical and must underpin ESMF subproject screening. Management of clustered forests was described as involving three compartments each managed for five years, with harvesting decisions dictated by concessionaires under authority supervision. (b) Protected Areas and Buffer Zones: Stakeholders clarified that protected areas are legally defined, with a three-kilometer buffer zone between commercial and protected forests. Communities within five kilometers of a project are considered affected and must be engaged in planning. A 30–60 day objection period applies to demarcation processes. Encroachment, illegal hunting, mining, and human-wildlife conflicts particularly elephant crop damage were identified as recurring management challenges requiring attention (c) Land Use and Grievances: Participatory land use plans must be completed before any commercial activity. The current regulatory framework: including community forest bylaws and regulations, was described as largely descriptive rather than prescriptive, and stakeholders called for more detailed guidelines on managing operational issues between communities and concessionaires. Grievances are collected by community forest management bodies (CFMBs) and escalated to FDA, but the grievance register is not publicly disclosed. (d) Economic Activities and Infrastructure: The planned development of port handling facilities at Greenville and Grand Bassa, a wood processing facility, and a wood laboratory at the University of Liberia were discussed. These investments are expected to create up to 1,500 jobs	participatory land use planning as a prerequisite for commercial activities, and community engagement for all communities within five kilometers of project activities. Port handling facilities, processing facilities, and the wood laboratory will be subject to ESMF risk screening and will likely require site-specific ESMPs or ESIAs. The team acknowledged the need to strengthen prescriptive guidance on community-concessionaire operational issues and grievance escalation within the ESMF, including development of more detailed GM guidelines. The PIU confirmed that the LMP will cover all categories of workers engaged under LiFE-P including community workers in CFMA and conservation operations, FDA regional staff as direct workers, concessionaire-engaged workers, and community alternative livelihood participants. The PIU noted that existing FDA ranger terms of reference will be reviewed for consistency with LMP requirements. LMP provisions will explicitly address OHS and grievance access for community workers in alternative livelihood activities under conservation management plans.	provisions Review and analyze ESMF questionnaire and instrument to identify gaps and recommendations Share community engagement handbook and SOP documents for ESMF baseline reference Document community labor arrangements in clustered forest management to inform LMP provisions on community and contracted worker engagement terms; Ensure LMP provisions explicitly cover alternative livelihood IGA participants

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No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			and shift Liberia from raw log exports to processed timber products but will generate site-specific E&S risks requiring ESMF-governed assessment. Transportation challenges, poor roads and high haulage costs, were raised as factors reinforcing the need for local processing. (e) Boundary Disputes: A case study of two neighboring communities where a boundary dispute arose from incomplete notification and demarcation illustrated the need for robust pre-works screening, documentation requirements, and dispute resolution procedures within the ESMF. Other key feedback from stakeholders includes: Gola Forest National Park at Grand Cape Mount County, cuts across Sierra Leone and Liberia, Illicit mining (gold and diamonds) hampers the effective management of forest resources. Hunting of bush meat at Gola: e.g elephant, pangolin. No interagency SOPs for effective conservation. Each ranger operating at the national parks and reserve has a TOR. PAs have management plans e.g Gola management plan and monthly reports are developed. LMP related issues- (a) Community Worker Arrangements in Clustered Forests: Management of clustered community forests involves dividing areas into three five-year compartments, with harvesting and processing decisions dictated by concessionaires under authority supervision. This raises questions about terms and conditions applicable to community workers engaged in these operations and the extent of concessionaire accountability for labor standards. (b) Ranger Capacity and Working Conditions: Rangers operate under terms of reference from the FDA but face severe resource constraints with limited personnel, vehicles, and equipment affecting their ability to conduct effective enforcement. This raise OHS and labor rights concerns for rangers as direct workers under the project, including access to		

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No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			appropriate equipment, safety provisions, and grievance mechanisms. (c) Alternative Livelihood Workers: Management plans for conservation areas include community engagement in beekeeping, honey production, agriculture, and agroforestry. These activities engage community members as workers and require minimum labor standards, OHS provisions, and access to grievance mechanisms consistent with LMP requirements. (d) Informal Labor and Illegal Activities: The absence of formal labor arrangements in and around protected areas was noted as a factor driving community members towards illegal logging, hunting, and mining which carry significant OHS risks without any formal labor protections or grievance access.		
Regional/County level²⁹					
	April 6, 2026	Grand Cape Mount County-Sembehun Community, Piso Lake Multiple use Reserve (LPMR) Total number of participants: 30 Sex disaggregated: Male: 12 Female: 18	The youth leader sought to understand what type of project was envisaged for the Lake Piso area and how the community would be positively impacted. The County Chief, women's leader, and community members expressed their commitment and support for the project outcomes. The County Chief explained that the existing livelihoods in the community include cassava production, local fishing at the creeks, and charcoal production. Community members noted that the FDA has been raising awareness within the Lake Piso Multiple Use Reserve. Three communities surrounding the forested mountain areas of the Piso Reserve include Robertsport, Torsor, and Sembehun. A community member asked how their livelihoods would be sustained if they were no longer able to access the forest. The Town Chief noted that the community will support	The Park Warden of the FDA introduced the PIU and the team to the community. The PIU then presented the scope of the proposed project. The PIU noted that the proposed interventions would target women and youth, with particular emphasis on support for women-led activities. The PIU further noted that the project would explore the development of sustainable livelihood options for impacted forest communities, with targeted support for women, to reduce communities' dependence on forest resources.	

²⁹ County level Stakeholders: Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council, Youth Leaders, Women Leaders, Community members, Women/Girls, Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers, Loggers/Timber processors & sawmill operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB

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No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			the FDA in preserving the forest and indicated that they understand and are aware of the forest demarcation. He further noted that the community has been committed to refraining from using forest resources for the past three to four years.		
	April 7, 2026	Grand Cape Mount County-Park Warden, Piso Lake Multiple use Reserve (LPMR) Total number of participants: 5 Sex disaggregated: Male: 5 Female: 0	There are nine forest rangers stationed at Lake Piso under the FDA, a number they consider inadequate to manage 1,844 hectares of primary forest. There are no conservation assistants or eco-guards to support conservation efforts. Approximately 120 settlements surround the reserve, encompassing the forest areas, the lake, and the mangrove area. Equipment required for forest monitoring, including speed boats, motorcycles, vehicles, and 5KVA generators, is either absent or non-functional. Regarding forest encroachment activities such as tree cutting, fish smoking, pit sawing, and hunting, these are first reported to the Town Chiefs for resolution between the FDA and the county administration.	Although the ranger reports were not available at the time of the consultations, the FDA noted that they would provide them.	The protected area management plan
	April 6, 2026	Grand Cape Mount County-Superintendent, County Admin Officer, Fiscal Affairs Total number of participants: 10 Sex disaggregated: Male: 9 Female: 1	The Superintendent noted that the county was established in 1856 and has been exploited for many years; however, it is considered a land of endless opportunities. He emphasized that there is a significant issue with the FDA's management and enforcement mechanisms, given the high degree of illegal logging activities. He further highlighted the importance of the FDA working closely with communities and educating them on the benefits of forest preservation, including through the proposed project. The Superintendent expressed concern about the conduct of an FDA staff member (Park Administrator) in the community, who was reportedly involved in an incident related to the Wakolo water utility. Letters were written to the Managing Director of the FDA to report the matter, and the Superintendent indicated that he does not want the individual present in their	The PIU noted that the proposed project would prioritize women in the envisaged programs, given their dependence on forest resources for their livelihoods. The PIU also noted that they would follow up on the matter involving their staff member, the Park Administrator.	FDA to follow up on the issue the superintendent raised concerning the park administrator.

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No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			communities. Stakeholders noted that the ecosystem is degrading and emphasized that women should be encouraged to participate in the project, as their livelihoods are heavily dependent on forest resources. Fire outbreaks are a recurring issue in and around the communities. An example was cited by a nursery supported by the donors, which lost approximately 10,500 trees across 50 hectares of degraded land.		
	April 8, 2026	Regional Forester-FDA Regional Office in Bomi County Total number of participants: 4 Sex disaggregated: Male: 3 Female: 1	Logistics and mobility: There is insufficient logistical support to manage more than 8,000 hectares of the Gola Forest. Only one motorbike is available, a situation similar to that at Lake Piso. Understaffing: There are fewer than 25 active staff at the Gola Forest National Park, which is inadequate for effective management of the area. Commercial logging management: It has been challenging to manage the only active logging company operating in the area. Miscellaneous funding and law enforcement: On January 4, 2026, in Gbarpolu County, seven community members attacked an elephant. Although they denied involvement in the elephant's demise, they were charged in court for possession of protected animal parts, including tusks, were fined and detained for 3 weeks. The police were involved prior to prosecution. Access to auditable miscellaneous funding is critical for following up on forest-related violations, particularly as the regional office in Bomi is located in a remote area. Ranger rations and staffing: There is an ongoing issue regarding rations for rangers. Approximately 82 staff are deployed across commercial conservation, carbon, law enforcement, and checkpoint functions. Over the past two years, two cases of bushmeat hunting have been recorded. Human-wildlife conflict remains a significant issue within Protected Areas (PAs), with elephants having destroyed approximately 35 hectares of cassava farmland, causing tension between	The PIU will maintain ongoing stakeholder engagement with county leadership on environmental and social matters related to LiFE-P implementation throughout the project lifecycle.	The ESMF will facilitate the identification of these risks and the development of appropriate management measures. The Court ruling and fact-finding report on the elephant cases Monitoring report (Jan-April)

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No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			regulators and community members. Additionally, the Gbarpolu Superintendent expressed concern regarding an incident in which an elephant killed a community member. The FDA's response was reportedly delayed, and a compensation offer of \$1,000 was made but rejected by the community.		
	April 8, 2026	Gbarpolu County Gola Forest National Park Total number of participants: Sex disaggregated: Male: 5 Female: 3	A key challenge is the lack of equipment to monitor forest activities. Available equipment is limited to two GPS devices, one compass, and one motorbike to manage 88,000 hectares of the Gola Forest significantly insufficient for the scale of operations required. Staffing is also a critical issue. There are currently only 19 active rangers, while approximately 88 additional rangers are needed to adequately manage the area. Several communities are situated within and have encroached upon the Gola Protected Area and its 3-kilometer buffer zone, which includes the river bordering Liberia and Sierra Leone. Managing the Protected Area has been particularly challenging due to ongoing mining activities by these communities. The Society for the Conservation of Nature of Liberia (SCNL), a local NGO, has been supporting Gola Forest rangers by providing 40 eco-guards for field operations.	The PIU will maintain ongoing stakeholder engagement with county leadership on environmental and social matters related to LiFE-P implementation throughout the project lifecycle.	
	April 8, 2026	Gbarpolu County- Tema Town County administrators and community members Total number of participants: 40 Sex disaggregated: Male: 18 Female: 22	The community members welcomed the FDA team and expressed positive responses regarding the outcomes of the proposed project. Community members emphasized the need to strengthen the efforts of forest rangers and improve their engagement with the community. The General Town Chief acknowledged the benefits of preserving forest resources; however, he expressed concern over the lack of proper demarcation and boundary markings, which makes it difficult for community members to identify forest boundaries. He called on the FDA to address this issue. He further noted that the FDA should conduct routine checks on forest rangers to ensure the forest remains protected.	The PIU clarified the details of the eco-guard disengagement package and noted that ongoing stakeholder engagement with county leadership on environmental and social matters related to LiFE-P implementation will be continuous.	

ESMF – LMP LiFE-P (P508345)



No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			Due to a lack of manpower and the discontinuation of eco-guard support following the expiration of the SCNL engagement in December 2025, rangers are unable to adequately patrol the large Protected Area extending to Grand Cape Mount County. The Youth Leader raised concerns about rangers restricting community members from accessing their farmlands situated within the forest buffer zone, noting that this creates tension between community members and rangers, particularly given the prevailing economic hardships. The Women's Leader expressed concern over the lack of schools and health facilities in the area, despite FDA project interventions in the Gola Forest. She also highlighted the absence of alternative livelihood support from the FDA, which restricts community members from accessing the forest zone. Community members acknowledged that some of their members had previously been engaged as eco-guards to support FDA rangers. However, following the expiration of their contracts, these individuals have remained unemployed and without support. The community appealed to the FDA to reinstate their involvement in patrol activities, noting that without support, former eco-guards may resort to utilizing forest resources. A female community member noted that due to the absence of healthcare facilities, community members rely on the forest for medicinal purposes. She further noted that while they have been encouraged to engage in lowland farming, they lack the capacity to do so. She emphasized that without alternative support, communities will continue to depend on forest resources, particularly for medicinal use.		
	April 9, 2026	Gbarpolu County-Superintendent, County Administrator,	The County Superintendent stated that communities that preserve the forest do not receive any benefits in return. He further noted that if the FDA restricts communities from farming in the forest, alternative	The PIU will maintain ongoing stakeholder engagement with county leadership on environmental and social matters related to LiFE-P implementation	

ESMF – LMP LiFE-P (P508345)



No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
		NUCFMB, National Head Total number of participants: 8 Sex disaggregated: Male: 7 Female: 1	livelihoods must be provided. Stakeholders raised concerns about the FDA's past performance, noting the absence of a structured system to protect both wildlife and humans. The Superintendent also reiterated his grievance regarding the elephant incident described in Bomi County by the Regional Forester, which remains unresolved. The following key issues were highlighted by stakeholders: The lack of alternative livelihood options remains a critical issue for forest-dependent communities. There is a need for a clearly defined system to delineate the mandates and responsibilities of each institution involved in forest management and protection. Significant conflict exists among government institutions regarding the protection and management of forest resources. Elephants have destroyed more than 30 hectares of cassava farmland, exacerbating tensions between communities and regulators More than 30 excavations have been recorded in forest areas, driven by mining activities that are causing significant degradation of forest resources.	throughout the project lifecycle.	
	April 10, 2026	Lofa County (Voinjama City)- Superintendent Regional officer Total number of participants: 4 Sex disaggregated: Male: 4 Female: 0	The Superintendent emphasized that the most critical issue is the coordination among the various government institutions involved in forest governance, alongside the need for proper documentation of monitoring activities. He further noted that some community members are being arrested for entering the forest, highlighting the need for clearer communication regarding community rights and responsibilities in relation to forest use. Communities must have a clear understanding of the enforcement aspects of the FDA, including what activities are permitted and prohibited within forest areas. Regarding forest demarcation and boundaries, the FDA should clearly communicate forest boundaries, buffer	The PIU will maintain ongoing stakeholder engagement with county leadership on environmental and social matters related to LiFE-P implementation throughout the project lifecycle.	

ESMF – LMP LiFE-P (P508345)



No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			zones, and permissible activities to community members. This should include the demarcation of private farms and forest zones. Demarcation should be conducted properly, with full community participation including the involvement of women and youth and supported by adequate documentation. There are four CFMAs in Lofa County with ongoing encroachment issues. It was noted that every government land acquired should be surveyed by the appropriate government institutions and formally deeded. The plantation within the county is government-owned but lacks proper documentation, with community members also laying claim to the plantation land. This situation underscores the urgent need for formal land surveys, titling, and documentation to resolve competing claims and prevent further conflict.		
	April 10, 2026	Lofa County (Voinjama City)- Regional Forester Total number of participants: 4 Sex disaggregated: Male: 4 Female: 0	The regional office has five staff members, with three proposed Protected Areas (PAs) Wonesgizi, Wolosgizi, and Foya PPAs each with a designated Park Warden. The Foya office has four staff members, comprising a Silviculture Officer, a Nursery Officer, and two rangers. Demarcation issues persist on both the FDA and community sides, contributing to ongoing tensions over land boundaries and forest use. The absence of alternative livelihood options for forest-dependent communities remains a critical challenge, as communities resort to cutting down trees for charcoal production in the absence of other income sources. Regarding the existing plantation and land, the government had previously negotiated with community approval and formal documentation. However, following the war, most of these documents including MoUs and land deeds were lost or destroyed. As a result, the FDA was required to renegotiate the plantation and the land on which the FDA regional office is situated, working through the	There is a need for fire control measures Community engagement and awareness Proper documentation by the FDA Reinforcing co-management of the plantation in Foya is important with adequate community engagement.	

ESMF – LMP LiFE-P (P508345)



No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			Land Authority (CLA) to re-demarcate the land and secure all land titles for the office land and plantation.		
	April 10, 2026	Lofa County (Foya) Silviculturist Total number of participants: 7 Sex disaggregated: Male: 7 Female: 0	Degraded lands suitable for restoration and commercial tree crops have been identified in Foya, including community woodlots, old tree plantations, and degraded forests. Forest fire is the primary threat to the forest, largely driven by farming practices particularly the slash-and-burn method used by farmers. A fire control system has been introduced, including field patrols and community awareness campaigns to reduce fire incidents. Fire control is community-based and is not conducted in coordination with the Liberia Fire Service. A recommendation has been made to communities to farm around swamps and low-lying areas rather than upland areas to reduce fire risk. Approximately 16 communities surround the Foya plantation areas. However, three of these communities Ndenu, Banpulo, and Lapalloe were laying claim to the oil palm plantation due to the absence of formal documentation on both the government and community sides. Approximately 50 hectares of plantation were lost in 2020 as a result of a fire outbreak.	The PIU will maintain ongoing stakeholder engagement with county leadership on environmental and social matters related to LiFE-P implementation throughout the project lifecycle.	
	April 10, 2026	Lofa County CFMB st Selayea district Total number of participants: 5 Sex disaggregated: Male: 3 Female: 2	The Chief Officer described the structure of the Community Forest Management Body (CFMB) and Community Assemblies, noting that Selayea is an authorized community forest comprising six towns and 17 villages. The six towns include Selayea, Yarpuah, Telemu (where mining activities are ongoing), Gorlu, Ganglota, and Beyan. The following challenges were identified: There is a lack of effective coordination between the FDA and the Ministry of Mines and Energy regarding forest and mining governance. The community forest has followed the required process to engage in conservation activities across 8,270 hectares within the six towns.		

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No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
			Local authorities have been interfering with community decisions within the CFMB in CFMAs, particularly in Telemu. Regarding support mechanisms: NGOs provide support to communities in prosecuting forest-related cases. FDA forest guards conduct weekly and monthly patrols, with reporting carried out accordingly. A joint enforcement team operates at the county level, comprising representatives from Immigration, the Police, the National Security Agency, the Fire Service, the Drug Enforcement Agency (DEA), the County Attorney's office, and the Ministry of Justice.		
	April 11, 2026	Nimba County-Superintendent Total number of participants: 3 Sex disaggregated: Male: 2 Female: 1	The issue of revenue sharing was discussed, with the Superintendent noting that the FDA does not operate in the interest of communities or the county. Nimba County does not benefit from forest tourism, as the revenue sharing mechanism remains unclear. Under the Forest Management Contract (FMC) arrangements, revenue is distributed as follows: 40% to the Republic of Liberia, 30% to affected communities, and 30% to the counties. The Superintendent further noted that community engagement by the FDA is insufficient, and that the FDA should operate within the existing county administrative structure. She cited the EPA as an example of an agency that has been effective and supportive in environmental protection. There is a clear need for interagency coordination among all government institutions on landscape management, particularly within the local government structure at the county level.	The PIU will maintain ongoing stakeholder engagement with county leadership on environmental and social matters related to LiFE-P implementation throughout the project lifecycle.	
	April 11, 2026	Nimba County-NUCFMBs Total number of participants: 6 Sex disaggregated:	The National Union of Community Forest Management Bodies (NUCFMBs) was established in 2009. The NUCFMB oversees 57 CFMAs and their associated CFMBs across all counties in Liberia, with each CFMB comprising five members. In terms of reporting, assembly meetings are held once a year in December, with quarterly reports shared with the national union. The following concerns and challenges were raised:	The PIU will maintain ongoing stakeholder engagement with county leadership on environmental and social matters related to LiFE-P implementation throughout the project lifecycle.	

ESMF – LMP LIFE-P (P508345)



No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
		Male: 5 Female: 1	There is a lack of coordination between the FDA and the Ministry of Mines and Energy. Stakeholders noted that mining licenses and concessions are being granted by the Ministry of Mines and Energy within designated CFMA conservation areas. Although the FDA is notified of these issues in writing, feedback is rarely received. During task force meetings convened to address these challenges, key decision-makers are frequently absent, making it difficult to take concrete steps and agree on a way forward. NUCFMB participants advocated for the development of a National Land Use Plan through a national survey, or the creation of a dedicated body to strengthen coordination among all ten regulatory institutions. There is a need to provide education and awareness to community members, along with a coordination mechanism for the management of Liberia's natural resources. There is a need for lawyers well-versed in FDA regulations, conservation, and environmental law to assist with judicial matters at the county level. Community participation in CFMA processes: During CFMA demarcation and inventory exercises, some community members are not adequately informed. While county-level administrators, including women leaders, typically attend, there is insufficient dissemination of information and decisions reached to forest community users and farmers. FPIC process: The Free, Prior, and Informed Consent (FPIC) process is followed for boundary harmonization, with consultations conducted at the local, county, and national levels, including newspaper advertisements. There is a concern regarding elite capture, whereby county administrators concession community lands while excluding NUCFMBs from the process.		
	April 13, 2026	Grand Cape Mount County-Torsor	Livelihood activities in the community include farming (rice, vegetables, and cassava) and fishing. The County Town Chief expressed support for the	The PIU will maintain ongoing stakeholder engagement with county leadership on environmental and social	

ESMF – LMP LiFE-P (P508345)



No	Date	Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team	Follow-up Action/Next Steps
		Community, Piso Lake Multiple use Reserve (LPMR) Total number of participants: 10 Sex disaggregated: Male: 6 Female: 4	proposed project and noted that the community maintains a good working relationship with the FDA. He stated that the land on which the FDA office is situated was voluntarily provided by the community. Community members noted that monkeys in the Lake Piso Multiple Use Reserve (LPMR) forest zone, managed by the Wakolo Jungle Lodge and Reserve, are destroying their crops. The community indicated that they are aware of the forest boundaries, which are marked along the tree lines.	matters related to LiFE-P implementation throughout the project lifecycle.	



8.2 Disclosure

The World Bank ESF / ESS require continuous engagements with stakeholders during the preparatory and implementation stages of all projects. After incorporating stakeholders' views in all environmental reports for projects, they are made available to project affected groups, local NGOs, and the public at large. Public disclosure of ESIA documents or environmental reports is also a requirement of the Liberia EIA procedures.

The ESMF including LMP as an annex was prepared in conjunction with the FDA/PIU, Government & Regulatory Institutions, Sub- National level/Potential target District and County Level officials, CBOs/NGOs, Community Representation and Organizations, the private sector and other relevant stakeholders. Stakeholder consultations have been undertaken in the preparation of this project as well as the ESMF.

Upon approval by the proponent and World Bank, and to fulfil the Pelosi Amendment requirement, final, cleared versions of the ESMF including the LMP as an annex are disclosed both in the implementing agency and county offices, and via EPA/public notice) and the World Bank's external website.

Prior to appraisal, the project will develop and disclose the Environmental and Social Commitment Plan (ESCP), a Stakeholder Engagement Plan, Resettlement Framework, and Process Framework. In addition, the project will conduct an Institutional Assessment (IA) to identify key institutional gaps and ensure effective ESF implementation and compliance with the World Bank Interim Guidance Note on Protected Areas; the IA will be disclosed 3 months after project effective date. The project will also develop a Security Management Plan (SMP) prior to appraisal to address risks associated with the use of security personnel in and around protected areas, consistent with ESS4 and applicable Good Practice Note. The project will conduct a Strategic Environmental and Social Assessment (SESA) of the legal, regulatory, and institutional reforms supported under Component 1, and disclose the SESA within 12 months after the Project's Effective Date.

Site-specific E&S instruments (e.g., ESIA/ESMPs/RPs) must be disclosed and implemented prior to works in the relevant area. The FDA PIU coordinates disclosure of the draft and final ESMF including the LMP as an annex through the implementing ministry/agency's website and offices, county administration offices in project areas, and community notice points; ensures materials are available in appropriate languages and formats; and notifies EPA and the public through media/notice procedures, while simultaneously submitting to the World Bank for its external disclosure prior to appraisal.



Annex 1

LABOR MANAGEMENT PROCEDURES (LMP)



ANNEX 1: LABOUR MANAGEMENT PROCEDURES (LMP)

ACRONYMS

CBA	Collective Bargaining Agreement
DWA	Decent Work Act, 2015
EHS	Environmental, Health and Safety Guidelines
ESF	Environmental and Social Framework
ESRM	Environmental and Social Risk Management
ESS	Environmental and Social Standard
HR	Human Resources
GM	Grievance and Redress Mechanism
LMP	Labor Management Procedures
MGCSP	Ministry of Gender, Children, and Social Protection
MOL	Ministry of Labour
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
PDO	Project Development Objective
PMU	Project Management Unit
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment



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EXECUTIVE SUMMARY

Scope:

This Labor Management Procedure (LMP) is developed for the following project:

Liberia Forest Economy Project (LiFE-P) [P508345]

The Project Development Objective (PDO) of the Series of Projects (SOP) is to “improve forest governance, expand sustainable forest management, and increase value chain output and jobs in selected forest areas in Liberia”. The SOP will retain the same PDO across all ensuing projects and will follow a consistent approach in terms of project design, ensuring maximum synergy and cross-learning through the different phases. The PDO of SOP1 is to improve forest governance, expand sustainable forest management, and increase value chain output and jobs in selected forest areas in the Northwest and Central North regions of Liberia.

Project Components

Component 1 will strengthen the enabling environment for sustainable, accountable and transparent forest management that benefits communities and broad-based economic development. Component 2 will support sustainable forest management to conserve and enhance forest resources while increasing their economic value and community benefits. Component 3 focuses on commercializing Liberia’s timber and non-timber forestry products by promoting sustainable production, transparent management, and competitiveness to unlock the sector’s potential to create more and better jobs. Together, these interventions will enhance governance, productivity, and climate resilience, while reducing the drivers of deforestation and degradation.

The FDA will serve as the lead implementing agency.

This LMP aims to anticipate and mitigate labor-related risks for the *[LiFE-P]* in compliance with the World Bank Environmental and Social Framework Standard 2 (ESS2). The LMP is a living document and will be updated throughout project implementation to address emerging issues. The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers.

Overview of labor use on the project

During the lifespan of the project, it is anticipated that the project will engage the following types of workers.

- Direct workers: These are workers with a direct contractual relationship with *[LiFE-P]* Project Implementation Unit (PIU).
- Contracted workers: These are workers with a direct contractual relationship with a supplier.
- Community workers: People employed or engaged in providing community labor.
- Primary Supply Workers: Workers employed or engaged by the project's primary suppliers, those who on an ongoing basis provide goods or materials directly essential to core project functions (such as construction materials, equipment).

It is estimated that the project will engage in total *[20]* direct workers, *[150]* contracted workers and *[850]* community workers and Primary Supply Workers (150). This workforce will be engaged as follows during the lifespan of the project:



It is estimated that the project will need a workforce in the following locations *Monrovia at the National Level; Gbarpolu, Grand Cape Mount, and Grand Cape Mount in the Northwest cluster, and Rivercess, Grand Bassa, Grand Gedeh, and Sinoe in the Central North and Southwest clusters* Project workforce is estimated to involve 10 direct workers, 10 contracted workers and 50 community workers.

It is expected that the project *will not* employ migrant workers during *project implementation*. Young workers above minimum age for work but below 18 years *may not* be involved in the workforce during *[project implementation]*.

Assessment of key potential labor risks:

It is anticipated that the project will have likely risks associated with *Child Labor, Forced and Compulsory Labor, Occupational Health and Safety (OHS), Labor Influx, Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) Discrimination and Unequal Treatment in Employment, Inadequate or pay below the national minimum wages, Supply Chain Labor Risks, Primary Supply Worker Risks, Worker Grievance* during different project phases and project activities. These anticipated risks will be appropriately mitigated as described in this Labor Management Procedure.

Overview of labor legislation: Terms and Conditions

All work undertaken under *LiFE-P* shall comply with The World Bank's ESF and the ESS2 on Employment and Working Conditions, international standards to which Liberia adheres, as well as the Liberia's legislation and regulations regulating labor and working conditions.

Responsible staff:

For implementation and reporting on this LMP, the *LiFE-P* will engage an *Environmental Specialist, a Social Specialist, Gender Specialist* and a GM Officer to manage the project.

Policies and procedures

The project, any contractor and third parties (subcontractors, brokers, agents and intermediaries) when accepting a contract to work on the project shall sign a Code of Conduct and will thereby commit to following policies and accompanying procedures related to non-discrimination and equal opportunity; Occupational Health and Safety (OHS); freedom of association; prevention of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH); prevention of child labor; prevention of forced labor and transparent and fair hiring of workers and worker documentation.

Age of employment

In accordance with ESS2, domestic and international laws, individuals under the age of 18 years are authorized to work in connection with the project on the condition that the work is not hazardous and that minimum age requirements, and special labor conditions are respected for these workers. The minimum age for authorized light work is 14 years, authorized full-time employment is at least 15 years or after finishing compulsory education, and 18 years is the minimum age for hazardous work. Conditions of young workers will be monitored with extra care to prevent exploitative and hazardous child labor.

**Terms and conditions**

Workers shall be engaged with a written contract that specifies terms and conditions of the work, hours of work, compensation, leave, and that take into account the special conditions that apply for vulnerable workers, such as pregnant women or women with small children, and young workers. These terms and conditions apply to all direct workers and contracted workers. Third parties are required to sign written employment contracts for all workers upon hiring and inform them of all employment related obligations. Contractors and workers will sign a Code of Conduct that ensures that they are aware of their rights and duties to the project.

Grievance mechanism

Workers on the project will have access to a grievance mechanism where they can report any workplace issue of concern. The grievance mechanism for workers shall be separate from the main project grievance mechanism and shall operate based on the principles of accessibility; confidentiality and cultural sensitivity; fairness, impartiality and protection from retaliation; accountability; adaptation based on severity of the complaint; right to appeal and escalate cases and continuous improvement.

The grievance mechanism for workers will be a multi-tier system with a lower tier workplace grievance entry point / office and a higher tier for more complex or sensitive cases. The Worker GM (WGM) shall give special considerations and have referral procedures for severe cases related to legal & ethical violations such as sexual harassment, exploitation, or abuse, workplace discrimination, forced labor, human trafficking, or exploitative working conditions, child labor involvement or violations, serious safety risks that have led to injuries or fatalities, retaliation against whistleblowers. For such cases, the project will establish collaboration protocols with relevant statutory and professional services for such cases to get tailored support and remediation

Contractor management

LiFE-P is overall responsible to ensure that contractors and third parties who mobilize and engage workers as labor force on the project are legally constituted and reliable entities and they are aware of and adhere to the policies, procedures and code of conduct established by this Labor management Procedures. The performance of contractors and third parties will be monitored through announced or unannounced inspections.

Community workers

Community workers do not need to be engaged in the project in writing, through an employment contract, but it will be ascertained that they offer their services voluntarily, are appropriately trained, are offered relevant tools and safety equipment, and are given clear communication of the terms and conditions prior to starting the work. Community workers will have access to a grievance mechanism, and the project responsible staff will conduct regular monitoring of community work to verify that community work fulfills requirements as per ESS2.

Primary supply workers

Primary supply workers, employed by contractors to the project, respond and report to the contractors with whom they have a contract. The project will hire contractors with a good reputation and will monitor that they uphold the law and requirements of ESS2. Project responsible staff will conduct regular monitoring of community work to verify that community work fulfills requirements as per ESS2. Primary supply workers will have access to the grievance mechanism.





1. BACKGROUND

This Labor Management Procedure (LMP) is developed for the following project *Liberia Forest Economy Project (LiFE-P) [P508345]* implemented by the Government of Liberia through FDA which will serve as the lead implementing agency], coordinated by the PIU.

The Project Development Objective (PDO) of the Series of Projects (SOP) is to “improve forest governance, expand sustainable forest management, and increase value chain output and jobs in selected forest areas in Liberia”. The SOP will retain the same PDO across all ensuing projects and will follow a consistent approach in terms of project design, ensuring maximum synergy and cross-learning through the different phases. The PDO of SOP1 is to improve forest governance, expand sustainable forest management, and increase value chain output and jobs in selected forest areas in the Northwest and Central North regions of Liberia.

Project Components: Component 1 will strengthen the enabling environment for sustainable, accountable and transparent forest management that benefits communities and broad-based economic development. Component 2 will support sustainable forest management to conserve and enhance forest resources while increasing their economic value and community benefits Component 3 focuses on commercializing Liberia’s timber and non-timber forestry products by promoting sustainable production, transparent management, and competitiveness to unlock the sector’s potential to create more and better jobs. Together, these interventions will enhance governance, productivity, and climate resilience, while reducing the drivers of deforestation and degradation.

The FDA will serve as the lead implementing agency.

The development and implementation of an LMP is requirements of Environmental and Social Standard 2 (ESS 2) "Employment and Working Conditions" of the World Bank's Environmental and Social Framework (ESF). It aims to

- Promote occupational health and safety.
- Encourage fair treatment, non-discrimination, and equal opportunity for project workers.
- Protect project workers, particularly vulnerable workers such as women, people with disabilities, children (of working age, as defined in this ESS), and migrant workers, as well as contract workers, community workers, and employees of major suppliers, where applicable.
- Prevent the use of all forms of forced labor and prohibited child labor.
- Support the principles of freedom of association and collective bargaining for project workers in accordance with national law.
- Provide project workers with the means to raise workplace issues. The following box presents the main characteristics of project management plans:

This LMP aims to anticipate and mitigate labor-related risks for the *LiFE-P*. It is compliant with ESS2 and the Liberia Decent Work Act by promoting safe working conditions, fair treatment, non-discrimination, prohibition of forced and child labor, and access to justice. It ensures alignment with Ministry of Labour’s (MoL) inspection mandates and Liberia’s national systems. The LMP is developed in the early stages of project preparation and will be updated throughout project implementation.

This LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers, including civil servants re-assigned to PIU/PMU duties (per Civil Service Standing Orders-CSSO), contracted firms, casual laborers, and community workers participating voluntarily.

2. OVERVIEW OF LABOR USE ON THE PROJECT



2.1. Project workforce need by project phase

During the lifespan of the project, it is anticipated that the project will engage the following types of workers

- Direct workers: These are workers with a direct contractual relationship with LiFE-P Project Implementation Unit (PIU)
- Contracted workers: These are workers with a direct contractual relationship with a supplier.
- Community workers: People employed or engaged in providing community labor³⁰.

It is estimated that the project will engage in total 20 direct workers, 150 contracted workers and 850 community workers. This workforce will be engaged as follows during the lifespan of the project:

Table 19 – Worker categories by project phases

Project phase	Type of worker	Estimated no. of workers
Phase 1- Mobilization/Preparation	Direct workers	15
	Contracted workers	30
	Community workers	150
Phase 2- Implementation	Direct workers	20
	Contracted workers	130
	Community workers	605
Phase 3- Completion	Direct workers	30
	Contracted workers	30
	Community workers	99

2.2. Workforce need by location

It is estimated that the project will need 1,109 workforce for the following types of jobs and with the following skills by project location:

Table 20 – Timing of labor requirements by location, types of jobs and skills needed

Project location	Number and type of worker	Type of job	Skills required	Timing of labor need
Location 1: Gbarpolu, and Grand Cape Mount in the Northwest cluster	5 Direct workers	Regional FDA foresters; EPD officers; CFMA coordination officers	Forest governance; community liaison; field monitoring; knowledge of CRL/NFRL	Year 1
	5 Direct workers	Regional FDA foresters; EPD monitoring officers; GIS/forest monitoring	Forest monitoring; RIL supervision; GIS data collection; law enforcement;	Year 2-4

³⁰ Projects may include the use of community workers in a number of different circumstances, including where labor is provided by the community as a contribution to the project, or where projects are designed and conducted for the purpose of fostering community-driven development, providing a social safety net or providing targeted assistance in fragile and conflict-affected situations.



		<i>field staff; FLED enforcement officers; CFMA compliance officers</i>	<i>community liaison; PA management (Gola NP)</i>	
	<i>10 Direct workers</i>	<i>FDA regional foresters; EPD compliance officers; Gola Forest NP and Piso Lake MUR management staff; community monitoring supervisors</i>	<i>Forest monitoring; PA management; CFMA compliance; community liaison; handover documentation</i>	<i>Year 5</i>
	<i>10 Contracted workers</i>	<i>Community facilitation (CRL nine-step devolution); participatory mapping and boundary demarcation of CFMAs; GIS and land-use mapping consultants; environmental and social baseline studies</i>	<i>Community engagement; participatory rural appraisal; GIS/remote sensing; legal knowledge of CRL; social assessment</i>	<i>Year 1</i>
	<i>30 Contracted workers</i>	<i>RIL technical advisors and logging supervisors; ecotourism PPP investment crews (Gola Forest NP); forest restoration and woodlot establishment crews; PA management infrastructure workers (ranger stations, patrol tracks); forest extension service providers for CFMAs; community monitoring trainers</i>	<i>RIL techniques; timber felling and extraction; construction (masonry, carpentry, plumbing, electrical); forest restoration; nursery management; PA management; community training and extension</i>	<i>Year 2-4</i>
	<i>10 Contracted workers</i>	<i>Plantation and woodlot maintenance supervisors;</i>		<i>Year 5</i>



		ecotourism PPP investment operational support (transition to PPP operator); CFMA close-out documentation consultants; community monitoring data verification specialists		
	50 Community workers	CFMA boundary demarcation crews; community assembly organization; participatory land-use planning teams; CFMB establishment committees	Land knowledge; basic literacy; leadership and governance; participatory planning; boundary marker installation	Year 1
	200 Community workers	Plantation rehabilitation laborers (9,741 ha); degraded forest restoration crews (5,000 ha — Gola buffer zones); community woodlot establishment workers (3,375 ha); RIL logging crews in clustered CFMAs; nursery workers; CFMB governance and management staff; IGA subproject workers (agroforestry, beekeeping, NTFP); PA buffer zone livelihood workers; community forest monitors	Land clearing and site preparation; planting and nursery management; RIL operations (chainsaw, skidder); agroforestry; NTFP harvesting; CFMB governance; data collection and monitoring; beekeeping	Year 2-4
	33 Community workers	CFMB governance and operational staff; plantation and woodlot maintenance	CFMB governance; silvicultural maintenance; IGA operations; data	Year 5



		<i>laborers; IGA and enterprise workers transitioning to self-sufficiency; community forest monitors</i>	<i>collection; NTFP processing</i>	
Location 2: Rivercess, Grand Bassa in Central North cluster	5 Direct workers	<i>Regional FDA foresters; CFMA coordination officers</i>	<i>Forest governance; community liaison; field monitoring; CRL knowledge</i>	Year 1
	5 Direct workers	<i>Regional FDA foresters; CFMA compliance and monitoring officers; EPD field inspectors</i>	<i>Forest monitoring; CFMA compliance; community liaison; field inspection</i>	Year 2-4
	10 Direct workers	<i>FDA regional foresters; CFMA compliance officers; EPD field inspectors</i>	<i>Forest monitoring; CFMA compliance; closeout documentation</i>	Year 5
	10 Contracted workers	<i>Community facilitation; boundary demarcation; social and environmental baseline assessments</i>	<i>Community engagement; participatory rural appraisal; social assessment; GIS mapping</i>	Year 1
	30 Contracted workers	<i>Forest extension service providers; CFMB office construction crews; woodlot establishment supervisors; IGA technical support providers; enterprise-level TA support</i>	<i>Construction (CFMB offices); community extension; agroforestry; NTFP value chains; enterprise development; matching grant administration</i>	Year 2-4
	10 Contracted workers	<i>CFMA closeout documentation consultants; enterprise TA residual support; plantation maintenance supervisors</i>	<i>Documentation; enterprise support; silvicultural management</i>	Year 5
	50 Community workers	<i>CFMA boundary teams; community assembly and CFMB</i>	<i>Land knowledge; basic literacy; community</i>	Year 1



		<i>establishment committees; participatory planning participants</i>	<i>leadership; participatory planning</i>	
	<i>200 Community workers</i>	<i>Woodlot establishment laborers; CFMB governance staff; IGA subproject workers; community forest monitors; plantation maintenance crews</i>	<i>Site preparation; planting; NTFP harvesting; CFMB governance; data collection; snail farming</i>	<i>Year 2-4</i>
	<i>33 Community workers</i>	<i>CFMB operational staff; woodlot maintenance workers; IGA workers in self-sustaining operations</i>	<i>CFMB governance; silvicultural maintenance; IGA operations</i>	<i>Year 5</i>
<i>Location 3: Grand Gedeh, Sinoe in the Southwest cluster</i>	<i>5 Direct workers</i>	<i>Regional FDA foresters; CFMA coordination officers</i>	<i>Forest governance; community liaison; field monitoring; CRL knowledge</i>	<i>Year 1</i>
	<i>5 Direct workers</i>	<i>Regional FDA foresters; CFMA compliance officers; EPD field inspectors</i>	<i>Forest monitoring; CFMA compliance; community liaison; field inspection</i>	<i>Year 2-4</i>
	<i>10 Direct workers</i>	<i>FDA regional foresters; CFMA compliance officers; EPD field inspectors</i>	<i>Forest monitoring; CFMA compliance; closeout documentation</i>	<i>Year 5</i>
	<i>10 Contracted workers</i>	<i>Community facilitation; boundary demarcation; baseline studies</i>	<i>Community engagement; GIS mapping; social and environmental assessment</i>	<i>Year 1</i>
	<i>30 Contracted workers</i>	<i>Forest extension service providers; CFMB office construction crews; enterprise TA support</i>	<i>Construction; community extension; NTFP and timber value chains; enterprise development; agroforestry</i>	<i>Year 2-4</i>
	<i>10 Contracted workers</i>	<i>CFMA closeout consultants; enterprise TA residual support; plantation</i>	<i>Documentation; enterprise support; silvicultural management</i>	<i>Year 5</i>



		<i>maintenance supervisors</i>		
	50 Community workers	<i>CFMA boundary teams; CFMB establishment committees; participatory planning participants</i>	<i>Land knowledge; basic literacy; community leadership; participatory planning</i>	<i>Year 1</i>
	200 Community workers	<i>CFMB governance staff; woodlot establishment laborers; IGA workers (agroforestry, NTFP, snail farming); community forest monitors; plantation maintenance</i>	<i>Site preparation; planting; NTFP harvesting; CFMB governance; snail farming ; data collection</i>	<i>Year 2-4</i>
	33 Community workers	<i>CFMB operational staff; woodlot maintenance workers; IGA workers</i>	<i>CFMB governance; silvicultural maintenance; IGA operations</i>	<i>Year 5</i>
Location Monrovia-FDA Headquarters	4: 5 Direct workers	<i>PIU Coordinator; FM Specialist; Procurement Specialist; E&S Specialist; Social Specialist; Gender Specialist; M&E Specialist and GM Officer</i>	<i>Project management; financial management; procurement; environmental and social safeguards; M&E; reporting</i>	<i>Year 1-5</i>
	40 Contracted workers	<i>Legal and regulatory reform consultants (NFRL/CRL/LRA harmonization); IT/LiberTrace specialists; HR/governance reform consultants; private sector skills demand assessment firm</i>	<i>Legal drafting; regulatory reform; software development; IT systems management; HR management; institutional reform; Construction and equipment installation (SEC/FTI); IT systems; curriculum development; enterprise program</i>	<i>Year 1-5</i>



			management; investment facilitation;	
	5 Community workers	FDA stakeholder consultation participants; Task Force for Forest Economy secretariat support; awareness-raising campaign participants	Stakeholder engagement; communications; basic administrative support; Forestry processing skills (sawmilling, kiln drying, grading, veneer); business management; enterprise operations; stakeholder engagement	Year 1-5

2.3. Worker profiles

Project workforce is estimated to involve the following types of worker profiles

Table 3 – Worker profiles

Type of worker	Male	Female	National or international migrants	Young workers or apprentices above the minimum allowed age for work but below 18 years.	Young workers between 18 and 25 years.
Direct workers	35	30	65	0	65
Contracted workers	110	80	190	0	190
Community workers	354	500	854	0	854

Migrant workers to be working in the workforce are estimated to come from *other countries under employment or consultancy contracts (Professionals and specialists entering Liberia) to provide technical expertise not available in the national labor market* and will cater to labor needs during *implementation phase*.

2.4. Contracting structure

Project workforce is estimated to be contracted through the following arrangement:

Table 21 – Contracting structure

Type of worker	Will be engaged directly by contractor / sub-contractor	Will be engaged through brokers, intermediaries or agents
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Contracted workers	100	0
Workers engaged by sub-contractors	35	0



3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The following potential risks are anticipated during different project phases and project activities and will need to be mitigated through proper measures.

Table 5 – Anticipated risks by project phase and project activity

Project phase	Activity	Key labor risk ³¹	Proposed strategy to mitigate risk
Phase 1- Mobilization	PIU and FDA staff recruitment	Discriminatory hiring practices excluding women and persons with disabilities; recruitment based on nepotism rather than competency	Transparent, competency-based recruitment procedures; non-discrimination clauses in all HR policies; gender targets for PIU staffing
	Engagement of legal, IT, and governance reform consultants	Absence of written contracts; unclear terms of engagement; inadequate grievance access for short-term consultants	Written consultancy contracts for all engagements; orientation on worker grievance mechanism before commencement
	Community facilitation through NGO/firm	Workers sourced through informal brokers without written contracts; recruitment fees charged to workers; child labor in community mobilization teams	Broker vetting; prohibition on recruitment fees in all contracts; age verification for all community-level recruits
	CFMA boundary demarcation and participatory planning	Exclusion of women from community planning teams; unpaid or underpaid community participants; community members below 18 engaged in boundary demarcation	Document community engagement terms; minimum remuneration standards; active monitoring for workers below 18

³¹ The key labor risks that ESS2 is concerned with include: hazardous work, such as working at heights or in confined spaces, use of heavy machinery, or use of hazardous materials; likely incidents of child labor or forced labor, with reference to the sector or locality; likely presence of migrants or seasonal workers; risks of labor influx or gender based violence (GBV); risk for accidents or emergencies, with reference to the sector or locality; general understanding and implementation of occupational health and safety requirements. In addition, weather related risks, such as heat stroke, dehydration and severe weather conditions should be considered.

ESMF – LMP LiFE-P (P508345)



	<i>Deployment of staff to remote field locations</i>	<i>Inadequate accommodation and sanitation for field-deployed consultants and FDA staff; lack of gender-segregated facilities</i>	<i>Minimum accommodation standards in field deployment guidelines; gender-segregated sanitation facilities at all field sites</i>
<i>Phase 2-Implementation</i>		<i>OHS risks — falls from heights, electrocution, structural collapse, construction dust and noise; absence of PPE and site safety protocols; labor influx and associated GBV/SEA risks in Monrovia peri-urban area</i>	<i>Site-specific OHS plans; mandatory PPE provision; OHS training before works commence; Code of Conduct for all construction workers; GBV/SEA action plan</i>
	<i>FTI/SEC facility rehabilitation civil works</i>		
	<i>Ecotourism PPP investment — Gola Forest NP and Lake Piso MUR</i>	<i>Significant labor influx of male migrant workers into remote forest communities; GBV/SEA risks; pressure on community water, food, and sanitation resources; community-worker conflict; inadequate living conditions in labor camps</i>	<i>Labor influx management plan; Code of Conduct; community-worker engagement protocols; adequate camp facilities with gender-segregated sanitation; GBV referral pathways</i>
	<i>CFMB office construction across 20 CFMAs</i>	<i>Engagement of unskilled local labor through informal brokers without written agreements; child labor risk in remote communities; inadequate OHS measures for small-scale construction</i>	<i>Written engagement agreements for all workers; age verification; basic OHS orientation; site inspections by PIU Environmental Specialist</i>
	<i>Reduced-impact logging in clustered CFMAs</i>	<i>High OHS risk chainsaw injuries, falling trees, log extraction accidents, machinery hazards; absence of formal safety management in community forestry operations; inadequate PPE; risk of fatal accidents</i>	<i>RIL-specific OHS plans; mandatory chainsaw and felling safety training; PPE provision (helmets, gloves, boots, eye protection); incident reporting system; no solo working in harvesting operations</i>
	<i>Plantation rehabilitation — 9,741 ha</i>	<i>Seasonal migrant workers engaged</i>	<i>Written seasonal contracts; direct</i>



		<i>through informal labor recruiters without contracts; unpaid or irregular wages; workers below 18 engaged in heavy manual labor (land clearing, soil preparation); heat stress and physical exhaustion during dry season works</i>	<i>wage payment; age verification; rest breaks and hydration provisions; OHS orientation for seasonal laborers</i>
	<i>Degraded forest restoration — 5,000 ha (Gola buffer zones)</i>	<i>Child labor in restoration planting activities in remote Grand Cape Mount communities; forced community participation in restoration works under pressure from community leaders; inadequate remuneration for community restoration laborers</i>	<i>Active child labor monitoring; community awareness on prohibition of forced labor; documented voluntary engagement terms; minimum wage compliance for restoration workers</i>
	<i>Community woodlot establishment — 3,375 ha</i>	<i>Women's exclusion from paid woodlot labor opportunities; informal engagement of community workers without documented wage agreements; OHS risks from land clearing and planting tools</i>	<i>Gender-equitable recruitment targets for woodlot labor; documented engagement terms; basic tool safety training</i>
	<i>Matching grant scheme — community livelihood subprojects (IGAs)</i>	<i>Child labor in agroforestry, snail farming activities; exploitation of community workers by IGA subproject managers; unequal distribution of grant benefits excluding women and vulnerable groups; OHS risks from snail farming management</i>	<i>Subproject-level child labor screening; IGA worker engagement standards in PIM; gender-equitable benefit distribution criteria; basic OHS guidance for IGA activities</i>
	<i>Results-based financing — MSME enterprise investments (C3.1)</i>	<i>Workers in financed enterprises lacking written contracts; wages below minimum threshold; OHS</i>	<i>Enterprise labor compliance assessments as part of results-based financing due diligence; OHS</i>



		<i>risks from processing equipment (chainsaws, sawmills, kilns); child labor in enterprise supply chains; discrimination against women workers in enterprise hiring</i>	<i>plans for processing enterprises; supply chain labor monitoring; non-discrimination clauses in enterprise performance agreements</i>
	<i>SEC/FTI training programs (C3.2)</i>	<i>Exploitation of trainees as unpaid or underpaid labor by host enterprises during internships; gender discrimination in trainee selection and placement; OHS risks for trainees operating industry-standard processing equipment without adequate supervision</i>	<i>Internship agreement standards (minimum stipends, co-financing by private sector); gender targets for trainee cohorts; supervised equipment training before independent operation; OHS orientation for all trainees</i>
	<i>PA management infrastructure — Gola Forest NP and Lake Piso MUR</i>	<i>OHS risks for workers constructing ranger stations and patrol tracks in remote and ecologically sensitive areas; risk of wildlife encounters during construction and patrol activities; inadequate living conditions for ranger staff in remote PA locations</i>	<i>Site-specific OHS plans for PA infrastructure works; wildlife encounter protocols; adequate ranger accommodation and welfare standards</i>
	<i>PPP transaction advisory and feasibility studies (C3.3)</i>	<i>Informal engagement of local field survey assistants without contracts or OHS coverage; exclusion of women from technical advisory and survey teams</i>	<i>Written engagement terms for all field survey staff; gender inclusion in local survey team composition; basic OHS orientation for field activities</i>
	<i>Community forest monitoring — all CFMAs</i>	<i>Community monitors below 18 engaged in remote forest data collection; inadequate remuneration for monitoring activities; safety risks in remote forest environments (wildlife encounters, falls, navigation)</i>	<i>Age verification for community monitors; documented remuneration agreements; field safety protocols; communication systems for remote monitoring teams</i>



	Enterprise supply chains — timber and NTFP value chains	Child and forced labor in primary supply chains (NTFP harvesting, chainsaw milling, rubber tapping) beyond direct project oversight; unsafe working conditions for informal primary producers supplying project-financed enterprises	Supply chain labor risk assessments for all supported enterprises; supplier code of conduct; periodic supply chain monitoring by Social Specialist
Phase 3-Completion	Plantation and woodlot maintenance	Reduced seasonal workforce with weakened contract oversight as project winds down; risk of wage non-payment or delayed payment during closeout; child labor resuming in maintenance activities without active project monitoring	Maintain active labor monitoring through closeout; ensure final wage settlements before project closure; closeout child labor monitoring protocol
	Independent project evaluation and audit	Evaluators conducting community interviews without adequate GBV/SEA sensitivity; inadvertent re-traumatization of GBV survivors during social impact assessments	GBV-sensitive evaluation protocols; trained female evaluators for gender-related assessments; survivor-centered interview guidelines
	SEC graduate tracer system	Privacy risks for graduates tracked post-training; potential discrimination against graduates in employment based on project affiliation or gender	Data privacy protocols for graduate tracking; non-discrimination assurances for participating employers
	LiberTrace and GIS system handover to FDA	FDA technical staff assuming full system management without adequate transition support; risk of staff overload and burnout during handover period	Phased handover plan with overlapping support period; adequate staffing levels for transitioned systems; workload monitoring for handover staff

A detailed overview of the potential health and safety risks that may arise during project implementation, together with corresponding mitigation measures, is provided in Annex 10: Health and Safety Hazards and Mitigation Measures. The annex outlines a broad range of potential physical, chemical, biological,



ergonomic, psychosocial, fire, traffic, structural, radiation, and emergency-related hazards, and presents clear, practical controls—including engineering and administrative measures, required PPE, training, inspections, and emergency preparedness procedures. Readers are encouraged to refer to Annex 10 for the full matrix of potential hazards, their descriptions, and the appropriate mitigation strategies needed to ensure safe and compliant project execution.



4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

All work undertaken under *LiFE-P* shall comply with The World Bank's ESF and the ESS2 on Employment and Working Conditions, WB ESIRT procedures, international standards to which Liberia adheres, as well as the Liberia's legislation and regulations on labor and working conditions, in particular:

- The 1986 Constitution of the Republic of Liberia
Liberia's ratification of ILO conventions, including Convention No. 87, No. 98, and No. 100, C029 - Forced Labour Convention, 1930 (No. 29)
- Decent Work Act, 2015
- Civil Service Standing Orders (CSSO)
- Children's Act, 2011
- Hazardous & Light Work Lists (2022)
- The Environmental Protection and Management Law (EPML), 2002
- The National Public Health Law, 2010
- the National Water, Sanitation & Hygiene Commission Act, 2012
- National Forestry Reform Law, 2006
- Domestic Violence Act, 2019
- The Education Reform Act 2011
- Liberia National Youth Policy, 2019
- Ratification of the Convention on the Rights of Persons with Disabilities, 2012
- National strategy on the implementation of the UN Convention on the Rights of Persons with Disabilities, 2013

Constitutional and Legislative Foundations. The Constitution of Liberia establishes essential labor rights, including freedom of association, the right to employment, and collective bargaining. These principles are operationalized through the Decent Work Act (2015), which prohibits forced labor, restricts child labor, and incorporates safeguards consistent with ESS2, particularly for vulnerable workers. The Act also mandates occupational health and safety (OHS) standards and provides mechanisms for worker grievances, promoting representation, fairness, and non-discrimination in alignment with ESS2.

Institutional Roles in Enforcement. The Ministry of Labour (MoL) and the Environmental Protection Agency (EPA) serve as the primary institutions responsible for enforcing labor and workplace standards. The MoL oversees compliance with the Decent Work Act, including enforcement of OHS regulations, while the EPA supports safe labor environments through enforcement of environmental laws that intersect with worker health and safety.

International Commitments. Liberia's ratification of key ILO Conventions-including Convention 87 (Freedom of Association), Convention 98 (Collective Bargaining), and Convention 100 (Equal Remuneration)-reinforces the country's alignment with ESS2 principles. These commitments strengthen national obligations related to freedom of association, collective bargaining, non-discrimination, and the prohibition of forced and child labor, as well as reinforcing standards related to SEA/SH and GBV.

Occupational Health and Safety Oversight. The MoL's Department of Occupational Health and Safety reviews OHS policies for all establishments engaged in medium- or high-risk activities, ensuring compliance with standards aimed at preventing workplace injuries and fatalities. The Department conducts inspections, monitors safety practices, and issues compliance notices where regulatory requirements are not met. Daily field operations are carried out by safety officers reporting to the Department's Director.

Labor Law Enforcement and Monitoring. The MoL enforces national labor laws through a cadre of labor inspectors, while the EPA monitors workplace safety conditions in accordance with the Environmental Protection



and Management Law (EPML, 2002). Together, these institutions contribute to meeting ESS2 requirements for effective oversight and enforcement of labor and working conditions.

Strengthening Capacity and Stakeholder Engagement. Liberia continues to strengthen institutional capacity through ongoing training programs for government officials and labor inspectors, enhancing compliance and enforcement of ESS2-aligned standards. Partnerships with the World Bank, ILO, and other development partners provide critical technical support. Stakeholder engagement-especially the involvement of workers in decision-making and grievance processes-further reflects ESS2's emphasis on inclusiveness, transparency, and accountability.

A detailed description of key requirements of ESS2, national legislation and regulations, and strengths and gaps is available in Annex 1.

Legal framework related to child labor and child trafficking

Liberia has ratified most relevant international conventions that define and guide responses to child labor and child protection violations, including the two fundamental ILO conventions related to child labor, and fundamental UN conventions on child rights and child protection rights, including the:

- C138 - Minimum Age Convention, 1973 (No. 138), ratified by Liberia in 2022.
- C182 - Worst Forms of Child Labour Convention, 1999 (No. 182), ratified by Liberia in 2003.
- C029 - Forced Labour Convention, 1930 (No. 29), ratified by Liberia in 1931.
- Convention on the Rights of the Child, ratified by Liberia in 1990.
- Optional Protocol to the Convention on the Rights of the Child on the Sale of Children, Child Prostitution and Child Pornography, ratified by Liberia in 2004
- Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention Against Transnational Organized Crime (Palermo Protocol), ratified by Liberia in 2004.
- African Charter on the Rights and Welfare of Children, 1990 was ratified by Liberia in 2007.

Liberia has *not* adopted some non-fundamental ILO conventions that, although not specific on child labor, are nevertheless important for the protection of workers, including children. This includes for example **C155** - Occupational Safety and Health Convention, 1981 (No. 155), **C129** - Labour Inspection (Agriculture) Convention, 1969 (No. 129), the **C077** - Medical Examination of Young Persons (Industry) Convention, 1946 (No. 77), **C078** - Medical Examination of Young Persons (Non-Industrial Occupations) Convention, 1946 (No. 78) **C124** - Medical Examination of Young Persons (Underground Work) Convention, 1965 (No. 124) and the **C188** - Work in Fishing Convention, 2007 (No. 188). Liberia is cooperating with the West African Network of Child Protection and the Economic Community of West African States (ECOWAS) Anti-Human Trafficking Unit to coordinate efforts and fight against the trafficking of children.

Liberian Law is mostly aligned with international conventions to protect children from child labor. As per this legislation the minimum age for full-time employment is 15, however, it prohibits the employment of children younger than age 16 during school hours. This is aligned with the compulsory school age which is between 6 and 16 years. The legal provisions defining child labor and providing protection of children from child labor are included in the Children's Law (2011), as well as the Decent Work Act (2015).

Liberian Law includes definition of "light work" which is allowed from 13 years and has issued a Hazardous and Light Work List in 2022 that complements the legal definition of light work, in an important manner. While the Hazardous work list has been adopted by relevant authority, it is yet to be gazetted.



Liberian Law furthermore prohibits the worst forms of child labor, including hazardous work, and Hazardous work for children is further detailed in Hazardous and Light Work List of 2022.

There is sufficient legal provisions against trafficking and Liberia has passed and enacted the Revised Act to Ban Trafficking in Persons Within the Republic of Liberia, in September 2021, which amended the 2005 Act to Ban Trafficking in Persons and brought Liberia’s trafficking laws in line with international law. The Revised Act criminalized all forms of sex and labor trafficking and prescribed minimum sentences of 20 years’ imprisonment, which were sufficiently stringent and, with respect to sex trafficking, commensurate with those prescribed for other serious crimes, such as kidnapping. Article 1-104(f) defined “exploitation” broadly to include child pornography, which was inconsistent with international law³². There is also an Act to Amend the Penal Law Regarding Extortion, Environmental Crimes and Illicit Trafficking in Human Beings and Migrant Smuggling of 2012.

5. RESPONSIBLE STAFF

For implementation and reporting on this LMP, the [LiFE-P] will engage the following staff with the following responsibilities: These staff [will be/are] organized as follows:

Table 6 – Responsible staff

Job title	Professional responsibilities
<i>Environmental Specialist</i>	<i>The Environmental Specialist's responsibilities under the Labour Management Procedures (LMP) focus primarily on occupational health and safety, hazardous materials management, and ensuring that labor risks associated with physical and environmental works are identified, mitigated, and monitored.</i>
<i>Social Specialist</i>	<i>The Social Specialist's responsibilities under the LMP cover labor rights, employment conditions, grievance management, contractor compliance, community-worker relations, and the protection of vulnerable worker groups across all project components.</i>
<i>Gender Specialist</i>	<i>The Gender Specialist's responsibilities under the LMP focus on eliminating gender-based discrimination in employment, preventing GBV and SEA in the workplace and project communities, ensuring equitable access to project labor opportunities for women and vulnerable groups, and mainstreaming gender considerations across all labor management activities.</i>
<i>Grievance Mechanism Officer</i>	<i>The Grievance Mechanism (GM) Officer under LMP is responsible for overseeing and monitoring the worker grievance mechanisms established and operated by contractors across all active project sites ensuring that each contractor's GM meets the minimum standards required under ESS2, the LMP, and the project's contractual obligations, and that all project workers have access to a fair, confidential, and effective channel for raising concerns about their working conditions, wages, safety, or treatment without fear of retaliation.</i>

³² U.S. State Department (2023). Trafficking in Persons Report: Liberia. Online. Available at: <https://www.state.gov/reports/2023-trafficking-in-persons-report/liberia/> [Accessed 28 June 2024].

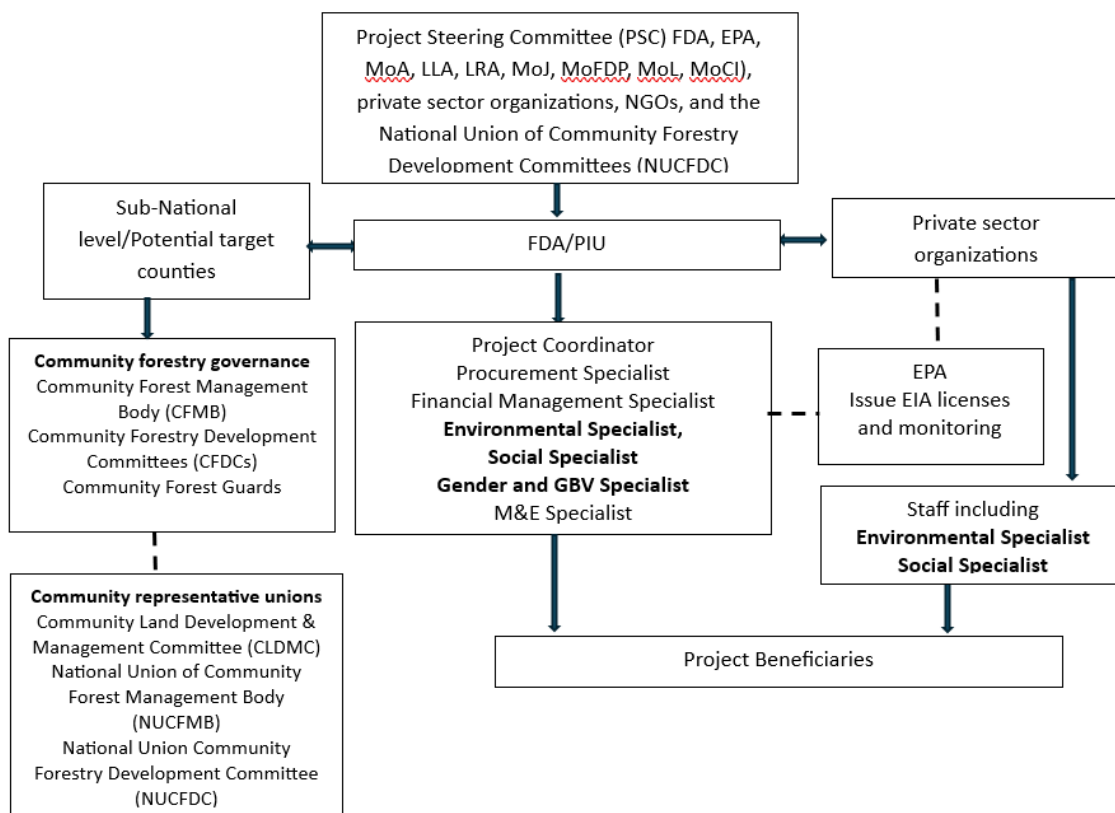


Figure 31: Organogram



6. POLICIES AND PROCEDURES

The project, any contractor and third parties (subcontractors, brokers, agents and intermediaries) through accepting a contract to work on the project shall commit to the following policies and procedures and shall sign a Code of Conduct (Annex 2) upon agreeing to supply work and workers to the project:

Table 7 – Workplace policies and procedures

Policy	Commitment	Procedure
Non-discrimination and equal opportunity	The project and all workplaces offered by the project shall demonstrate a commitment to diversity and equal opportunities for all employees offer inclusive work environments where all individuals are treated with dignity and respect. Discrimination based on race, gender, age, religion, disability, or any other protected characteristic is strictly prohibited. The project and all workplaces offered by the project shall actively ensure the protection of vulnerable workers by ensuring fair treatment, safe working conditions, and access to support. Every employee has the right to work with dignity and respect, and to work in a supportive environment.	To ensure non-discrimination and equal opportunity the borrower will ensure and require contractors and third parties to: ▪ Ensure recruitment procedures and work contracts that enable and oblige equal opportunity and fair treatment for women, youth over 15 years, people with disability, people living with HIV/AIDS and any other category of people, in contractual documents. ▪ Monitor compliance of contractors and third parties with equal opportunity and non-discrimination principles in recruitment and hiring, compensation, working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. ▪ Provide training on the safeguarding of vulnerable workers, non-discrimination and equal opportunities principles. ▪ Ensure access to a Grievance and Redress Mechanism (GM) with special provisions for sensitive cases.
Occupational Health and Safety (OHS)	The project and all workplaces offered by the project shall demonstrate and prioritize occupational health and safety of workers, ensuring a risk-free environment for all employees. Compliance with safety regulations, proactive hazard prevention, and employee well-being are fundamental.	To ensure OHS, the borrower will ensure and require contractors and third parties to: • Identify potential hazards to project workers prior to initiating work. • Based on potential hazards, define preventive and protective measures and train project workers on OHS-measures. • Define OHS standards and implementation guidelines for workplaces. • Assign a person responsible for OHS and define tools, procedures and



	Training, protective measures, and reporting mechanisms shall be put in place to provide a safe, secure, and healthy workplace for everyone.	routines for OHS workplace monitoring (when where and by whom) • Undertake documentation and reporting of occupational accidents, diseases and incidents. • Have emergency prevention and preparedness and response arrangements in place to respond to emergency situations • Have remediation protocols pre-defined for eventual adverse impacts such as occupational injuries, deaths, disability and disease. • Ensure appropriate budget for implementation of these procedures.
Freedom of association	Workers on this project have the right to form and to join workers' organizations of their choosing, to bargain collectively without interference, and employers shall respect the role of legally established workers' organizations and workers' representatives.	To ensure freedom of association the borrower will ensure and require contractors and third parties to: • Not restricting project workers from expressing their grievances and protecting their rights and to not seek to influence, control mechanisms for grievances, not discriminate or retaliate against project workers who participate, or seek to participate, in such workers' organizations and collective bargaining. • Monitor compliance of contractors and third parties with those rights.
Prevention of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)	The project and all workplaces offered by the project shall apply a zero-tolerance approach to sexual exploitation, abuse, and harassment. Misconduct will be met with strict disciplinary action. Reporting is encouraged and whistleblowers shall be offered protection. It is everyone's duty to uphold dignity, integrity, and equality in the workplace.	To prevent SEA/SH the borrower will ensure and require contractors and third parties to: • Follow training on sexual exploitation, abuse, and harassment. • Ensure workers have access to and are informed about special procedures of a grievance mechanism for sensitive cases, that whistleblowers are given full protection, and that disciplinary action are enforced in case of misconduct.
Prevention of child labor	The project promotes the participation of children in work that takes into account their age, abilities, and developmental and educational needs. Access to work for children who have reached the minimum working age that is appropriate to their age and development is a key strategy to	The prevention of child labor shall be done through the implementation of the following procedures: • Age and identity should be verified for all workers through different methods: birth registration or official ID card and in the absence of that through a method that triangulates at least two different sources, e.g., school records, collecting testimonies from someone who knows the person.



	prevent child labor. When young persons below 18 years and above the minimum age for work are engaged in connection with the project, this should be done with commitment to ethical practices and through provision of a safe environment for all young individuals and under strict compliance with labor laws and guidelines to ensure the safety, rights, and well-being of minors.	• Request all contracted employers to keep a register of workers with names, dates of birth or their apparent ages. • Request all contracted employers to establish a policy and code of good conduct for the protection of children at work. • Request all contracted employers to establish a workplace list that defines the tasks prohibited for children under 18 that is informed from the Hazardous & Light Work Lists (2022), and Decent Work Act 2015 • Request all contracted employers to appoint a person responsible for monitoring working conditions of children under 18. • Request all contracted employers to establish an occupational health and safety policy and plan that defines the procedures for replacing a sick or injured worker that ensures that children do not replace adults for dangerous tasks. • Request all contracted employers to record and report all suspected cases of suspected child labor in connection with or as unintended impact of project activities. • Request all contractors to draw up an awareness and training schedule given the various work risks, including child labor. This training must cover the working conditions of young workers. Engagement of a young person under 18 years and above the minimum age for work can be done: • Only after receiving informed written parental or caregiver consent (Annex 3 and Annex 4) • After an appropriate risk assessment has been done at the workplace prior to engaging work. • Under condition that a medical practitioner has certified that the young person is in good health and is medically fit for work.
Prevention of forced labor	The project will implement strict policies to ensure ethical labor practices throughout operations and supply chains, including conducting due diligence, enforcing supplier	Request all contracted employers to • Communicate the terms of employment in writing • Comply with applicable laws and regulations with regards to terms



	compliance, and providing grievance mechanisms to protect workers from exploitation.	of conditions of employment. • Inform its employees, contractors and third parties about the applicable zero-tolerance for slavery, human trafficking, forced labor • Inform employers, contractors and third parties about an obligation to report violations. • Conduct assessments to ascertain compliance of third parties. Contracted employers shall not, and will assess that their sub-contractors do not: • Deny employees access to his/her immigration documents such as passports, driving license, etc., • Use misleading recruitment practices, • Use recruiters that do not comply with Labour Laws of Liberia or the law of the country/place where the recruitment takes place, • Fail to provide a flight ticket to destination or country of permanent residence at the end of contract/employment, • In the event of violation, we shall take action against the violating employee or contractor to include termination of contract and remediation of victim.
Transparent and fair hiring of workers	The project is committed to transparent and fair hiring which ensures that all candidates are evaluated based on merit, with clear job descriptions, unbiased selection criteria, and open communication throughout the recruitment process. This includes eliminating discrimination, providing equal opportunities, and maintaining integrity in hiring decisions to build trust and attract top talent.	Hiring Procedures Direct and contracted workers will be hired through open competition using the following procedures: 1. Job opportunities will be advertised on the employer's / company's website, and national newspapers with at least two weeks to application deadline. 2. Advertisements for work opportunities, other than describing the minimum profile of applicants and the job description, shall explicitly state that the employer applies a non-discrimination and equal opportunity principle in recruitment, that it encourages women, people with disabilities and other



		vulnerable groups to apply, that the employer / company commits to making adaptations for inclusion of such vulnerable group in accordance with requirements of the Decent Work Act (DWA) 2015 3. Compensation for work is based on a principle of equal pay between employees for the same work or work of equal value 4. The opportunity to be retained for work of pregnant women, or women with small babies should be equal to that of other persons with appropriate adjustments for their needs in employment in accordance with the Labour Act. 5. Information submitted to an employer / company during the recruitment process shall be treated with confidentiality. Establishment of contracts Written contracts shall be drawn up for all direct and contracted workers hired. Contracts shall include the following minimum information: • The date and place of establishment of the contract. • The employer's name, first name, profession and address. • The worker's name, first names, gender, date and place of birth, parentage, domicile and nationality, trade or profession. • Job title, job description and reporting lines in the company's hierarchy. • Workplace and possible travel. • Nature of contract, duration of contract, starting date, eventual trial period, notice period for termination of employment, and any eventual compensation package for early termination of contract (as applicable). • Working hours, rest periods and times, annual holidays and leave. • Salary, rules for defining salaries, wages and other benefits, including rules regarding the frequency of payments and deductions.
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		• Overtime rules and remuneration for overtime. • Information on accommodation, compensation for food and other required payments, as applicable. • Social protection coverage, such as pension plans, medical insurance, maternity benefits. • Reference to regulatory texts or collective agreements which govern all relations between employers and workers. • A reference to the GM and the Code of Conduct. • Other specific clauses agreed between the parties.
Transparent documentation	worker	The project is committed to ensuring and doing due diligence to ensure that contractors have employment records, contracts, and policies that are clearly communicated, easily accessible, and accurately maintained. This includes providing workers with full visibility into their rights, responsibilities, and benefits, fostering trust and compliance with labor regulations. Documentation and register of employees and workers • Employers shall keep up to date, at the place of operation, a register of workers called "employer register" with workers name, date of birth, job title, job description and reporting lines in the company's hierarchy for each employee. • Companies employing workers to provide labor for the project shall be able to submit documentation on all workers hired, upon request of the <i>LiFE-P</i> and the World Bank if and as required.



7. AGE OF EMPLOYMENT

In accordance with ESS2, International Conventions (ILO Convention 138 and 182 and the Convention on the Rights of the Child and the African Charter on the Rights and Welfare of the Child), national legislation and regulations (Decent Work Act 2015, Children's Act, 2011), individuals under the age of 18 years are authorized to work in connection with the project on condition that the work is not hazardous and that minimum age requirements, and special labor conditions are respected for these workers. The following conditions for engaging children for work apply on the project:

Table 8 – Conditions for engaging children in a World Bank financed project in Liberia

Type of work engagement	Conditions that allow for a child to be engaged for work
Light work from age 14 (as per ESS2)	Decent Work Act (2015) • Work for a maximum of two hours a day and fourteen hours a week. • Light work definition: work or any other activity that is not likely to be harmful to a child's health or safety, moral or material welfare or development, e.g., to prejudice the child's attendance at school or their capacity to benefit from instruction. • Activities defined in the Hazardous and Light Work List, 2022
Apprenticeship from age 15	Children's Law (2011) • Any contract for apprenticeship or employment shall be with the consent of the child's parent or guardian. • The record of such employment of a child as an apprentice must be sent to the Ministry of Labor (format and conditions for such reporting as prescribed by MoL) • The duties of an employer towards a child employee or an apprentice - train and instruct the child in a trade to the best of the ability, skill and knowledge of the employer; - provide reasonable pay or allowances for the services of the child; - take responsibility for any harm caused to the child as a result of the child's employment or apprenticeship; - provide a safe and healthy environment for the child; - abide by all other employment laws and regulations
Employment from age 15	Children's Law (2011) • Under condition that the employer fulfills the following conditions towards a child employee or an apprentice - train and instruct the child in a trade to the best of the ability, skill and knowledge of the employer; - provide reasonable pay or allowances for the services of the child; - take responsibility for any harm caused to the child as a result of the child's employment or apprenticeship; - provide a safe and healthy environment for the child; - abide by all other employment laws and regulations applicable to other Decent Work Act (2015)



	• Under condition that the employer keeps a register of all employed children, which shall clearly show their names, and their ages and their dates of birth, duly certified wherever possible (Article 21.5) • Under condition that a notice is posted at the workplace setting out the special conditions of work applicable to children set out in section and any other special conditions that are prescribed (e.g. the Hazardous and Light Work list, 2022) • A child who has reached the age of 15 but has not yet attained the age of 16 years may not be employed for more than 7 hours in any day, or for more than 42 hours in any working week and may not work during school hours. • For children above 15, daily hours of work for children shall include one or more rest periods totaling at least one hour, with rest periods so arranged that a child does not work for more than four consecutive hours • Annual leave + additional annual leave equivalent to the number of working days in one (1) week
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8. TERMS AND CONDITIONS

The following terms and conditions apply to workers on the *LiFE-P*.

Table 8 – Terms and conditions

Condition	Applicable standard
Contract	- Workers are engaged with a written contract that specifies terms and conditions of the work. - Contracts must comply with Decent Work Act, 2015.
Hours of work	- Full-time work consists of a maximum of 8 hours a day or forty hours a week. - A workday is normally from 8 AM to 5 PM with an hour break five days a week
Compensation	- Compensation shall be above minimum wage and in accordance with relevant collective bargaining agreements and shall be in line with the provisions of the constitution and other labor laws. - Wages are negotiated every three years as stipulated in the labor laws. - Overtime work shall be compensated for as per relevant sector collective bargaining agreements.
Leave	All workers are made to enjoy regular leaves, maternity leave and other such leaves and the accompanying benefits consistent with the national labor laws
Vulnerable workers	- Special conditions apply to vulnerable workers (for children see previous section). - Pregnant women shall not be assigned to do night work or overtime unless it is with her consent. - Pregnant workers or mothers of a child of less than eight months old shall not be engaged for overtime against her consent. Pregnant women shall not be assigned to a post outside her place of residence after the completion of the fourth month of pregnancy, if the assignment, in the opinion of a medical practitioner or midwife, is detrimental to her health.
Notice	Workers are made aware of the period of notice for resignation, and other duty excuses in line with national laws and best international practices.

These terms and conditions apply to all direct workers and contracted workers. Third parties are required to:

Sub Project Contractors and Sub-Contractors	- Are provided and sign written employment contracts for all workers upon hiring. - Shall inform hired workers of all employment related information and ensure that the workers understand the rights and obligations of both parties under the contract. - Shall ensure that their workers know the standards of conduct expected
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	of them. A written policy manual (Code of Conduct) specifying the rules and procedures will be issued and made readily available to all workers as part of the labor contract. The Code of Conduct will be explained to workers in a language they understand.
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9. GRIEVANCE MECHANISM

Workers on the project will have access to a grievance mechanism where they can report any workplace issue of concern. In addition to the worker grievance mechanism, there is an overall mechanism for the project where broader concerns and issues in relation to the project can be reported. The World Bank also has a global grievance and redress service. Each grievance mechanism has its specific entry points, functions and procedures, as per Table 9 below:

Table 9 – Grievance mechanisms for World Bank financed projects

	Grievance Mechanism for Workers	Project Grievance Mechanism	World Bank Grievance and Redress Service (GRS)
Entry Point	Through entry points set up by and advertised/managed by the employer/contractor.	Through entry points set up by and advertised/managed by the project PIU/PMU	World Bank website through online form ³³ , email (grievances@worldbank.org) or World Bank Headquarters or Country Office, using a form available on the World Bank Global website ³⁴ .
Functions	Receive and address workplace and contractual concerns	A mechanism where anybody can submit any concern related to the project's impact, functioning, a contractor, sub-contractor, third party.	A platform for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has or is likely to have adverse effects on them, their community, or their environment.
Procedures	As per description in this LMP	As per description of the Stakeholder Engagement Plan (SEP)	As per description on the WB global GRS website ³⁵ Procurement related complaints are submitted using specific procedures in accordance with guidelines on

³³ Online form for global grievance and redress services: <https://wbgrsgrs.powerappsportals.com/en-US/new-complaint/>

³⁴ Form to accompany written complaints sent by regular mail for submission to the World Bank Global Grievance and Redress Service: <https://thedocs.worldbank.org/en/doc/743201426857500569-0290022021/original/GrievanceRedressServiceGRScomplaintform.docx>

³⁵ GRS procedures and information: <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>



			the Grievance and Redress Services website ³⁶ . Allegations of WB Staff misconduct are submitted to the Ethics and Business Conduct Department ³⁷ .
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Objective

The grievance mechanism for workers has the objective to ensure early identification of concerns and malfunctions that could lead to individual dissatisfaction or harm, such as injuries and accidents of workers, disputes between employers and employees that could hamper the effectiveness of the project, or reputational risk that could jeopardize the successful conclusion of the project.

Purpose

The purpose of the grievance mechanism for workers is to:

1. Serve as a platform where workers can report and receive advice on their concerns and grievances and from which those concerns and grievances are channelled to management.
2. Identify remedies to concerns that can be implemented through internal procedures in the form of corrective action, mediation, settlement, or dispute resolution.
3. Channel complainants or refer cases to appropriate external mechanisms, including non-state and state-based mechanisms, such as Ministry of Labour, courts, gender-based violence (GBV) service providers, The Women and Children Protection Center (WACPS) of the Liberia National Police (LNP)³⁸, Ministry of Gender, Children and Social Protection, one-stop centres in the case of GBV/SEA/SH or child protection / child labor complaints³⁹. Such Complaints would only be referred to external mechanisms for support with the informed consent of the affected party.

General principles

The grievance mechanism for workers shall operate based on the following principles:

- **Accessibility:** All workplaces, contractors, sub-contractors, and third parties hiring and managing workers that constitute a workforce for the project, shall have clearly advertised where and how worker grievances can be submitted. Employees should be informed about the grievance mechanism through awareness raising and training.

³⁶ Guidance for procurement related complaints:

<https://thedocs.worldbank.org/en/doc/6b32629dd1e7e1f60ae23a3daeec2b6a-0290012025/original/Procurement-complaints-filing.pdf>

³⁷ Procedures for allegations of WB staff misconduct: https://www.worldbank.org/en/about/unit/ethics_and_business_conduct

³⁸ The WACPS of the Liberia National Police (LNP) is the primary investigative unit for GBV cases

³⁹ The Decent Work Act authorizes MOL and its labor inspectorate to handle social risk management related to labor issues, including child and forced labor, by receiving and addressing complaints (pertinent for World Bank ESS2 and ESS4). The Children's Law (2011) empowers the Ministry of Gender, Children and Social Protection to manage child protection cases



- **Confidentiality and cultural sensitivity:** All cases submitted to the worker GM shall be treated with cultural sensitivity and with confidentiality within the limits of what is possible for the resolution of the case.
- **Fairness, impartiality and protection from retaliation:** Complainants have the right to have their cases be treated objectively and without bias, and shall be able to report misconduct, discrimination, harassment, unsafe working conditions, or violations of company policies without fear of retaliation.
- **Accountability:** Employee(s) who file grievances shall be notified of the contractor's or employer's findings regarding the complaint, as well as the corrective action to be taken.
- **Adaptation based on severity of the complaint:** The procedures of the worker GM shall be adapted to the severity of the cases, based on a pre-established case typology.
- **Right to appeal and escalate cases:** If a complainant is **unsatisfied** with the outcome of a case, they should have the right to request an appeal or further review, including by a higher-level authority, or to escalate the complaint to any of the other grievance mechanisms / services as described in Table 9.
- **Continuous improvement:** The worker grievance mechanism should be regularly reviewed and improved based on worker feedback and lessons learned from past cases should inform updates and better practices.

Structure of the Grievance Mechanism

The grievance mechanism for workers will be a multi-tier system, as follows:

- **Lower tier:** Workplace grievance *committee* will be available at *[community/county level / contractor level /FDA-PIU]* in the form of *community grievance committees*. Unless workers prefer to report grievances to a higher tier directly due to sensitivities or other reasons, this will be the entry point for most grievance cases. It is anticipated that most cases will be handled and closed from this level and if this is not possible, cases can be referred to the higher tier for inputs, mediation and resolution.
- **Higher tier:** For more complex or sensitive cases, and/or if cases cannot be resolved by the lower tier, cases can be referred to higher tier of the grievance mechanism. This tier has two pathways, either through the project *PIU*, or through the statutory system, the Ministry of Labour or the court system for settlement.

If concerns are not related to individual cases, but of a collective nature or linked to a perceived systemic labor risk in relation to the project, these cases should be addressed to the project grievance mechanism, or if the nature of the complaint is sensitive, could be addressed to the World Bank Global Grievance and Redress Services.

Grievance procedure

The grievance procedure is as follows:

Step 1: Submission of a grievance case by a worker

Grievances from workers on the project can be submitted to any of the following entry points

Telephone (hotline and SMS)	+231 886 511 134 +231 777 282 838
WhatsApp / Message service	+231 886 511 134 +231 777 282 838
For direct workers	Forestry Development Authority FDA Central Office Whein Town Mount



	<i>Barclay Liberia</i>
For contracted workers	<i>FDA PIU, FDA Central Office Whein Town Mount Barclay Liberia</i>
For community workers	+231 886 511 134 +231 777 282 838

The grievance entry points, as well as the grievance form (available in Annex 6) to be used for submission of a complaint, should be well publicised and easily accessible in all workplaces of the project.

Step 2: Receipt, registration of grievance case in a grievance record and notification of receipt to the aggrieved party

This step shall be completed within 24-48 hours of the case being received by the GM depending on the level of severity of the case.

Upon receipt, all cases shall be classified by severity - light, moderate and severe cases - and the grievance form (Annex 6) be registered in a central grievance record that can be accessed through: <https://www.fdaportal.online/index.html>; +231 886 511 134/+231 777 282 838 or FDA Central Office Whein Town Mount Barclay Liberia

The central grievance record is managed by the PIU/PMU that makes sure that all grievance cases are allocated a unique number, allowing to track a registered case in the system until it has been closed.

The below case-typology (Table 10) is used to ensure resolution approach that is adapted to the level of severity of the case:

Table 10 – Typology of cases

Category	Definition	Examples of cases	Resolution approach	Deadlines
Light Cases: Minor Workplace Issues	Day-to-day concerns and/or workplace misunderstandings that do not significantly impact the worker's rights, safety, or well-being. They can often be resolved through direct dialogue or minor procedural adjustments	- Misunderstandings, disagreements or conflicts between colleagues. - Scheduling issues such as changes in shifts or confusion over work hours. - Resource access complaints: Lack of office supplies, tools, or workspace concerns. - Minor procedural concerns such as issues with	- Direct resolution between the involved parties. - Supervisor mediation or internal intervention by Human Resource (HR). - Quick administrative fixes or policy clarifications	Notification of receipt to complainant: Within 2 business days of receipt of a complaint Preliminary assessment: within 5 business days of receipt of a complaint Notification of action: within 10 business days of receipt of a complaint



		administrative processes, payroll delays (without financial harm).		Formulation of response: within 20 business days of receipt of a complaint
Moderate Cases: Labor Rights & Workplace Safety Concerns	These cases affect an employee's working conditions, dignity, or fair treatment, requiring formal investigation and corrective action.	• Unfair treatment: Bias in promotions, wage disparities, or favoritism. • Harassment (non-sexual): Bullying, verbal abuse, intimidation. • Workplace health & safety concerns: Hazardous conditions, lack of proper equipment. • Failure to comply with contracts: Disputes over benefits, overtime pay or agreed job responsibilities.	• Formal complaint to HR or grievance committee. • Investigation and corrective action with clear documentation. • Mediation or negotiation between affected parties. • Possible escalation if unresolved.	Notification of receipt to complainant: Within 2 business days of receipt of a complaint Preliminary assessment: within 5 business days of receipt of a complaint Notification of action: within 10 business days of receipt of a complaint Formulation of response: within 20 business days of receipt of a complaint
Severe Cases: Legal & Ethical Violations	Serious misconduct, violations of labor laws, or human rights abuses that demand immediate intervention, legal action, or external involvement	• Sexual harassment & abuse: Any form of sexual misconduct, exploitation, or assault. • Workplace discrimination: Based on race, gender, disability, or any protected characteristic. • Forced labor or human trafficking: Any case where	• Investigation by higher authority and legal reporting if required (government agencies, labor unions). • Immediate implementation of protection of affected workers (e.g., whistleblower safety measures). • Investigation	Notification of receipt to complainant: Within 24 hours of receipt of a complaint. Preliminary assessment: within 3 business days of receipt of a complaint Notification of action: within 5



		workers are coerced, trapped, or working under exploitative conditions. • Child labor involvement: Employment of children below the minimum age for work, or involvement of a minor in hazardous work or any child labor violations. • Serious safety risks: Severe negligence leading to workplace injuries or fatalities. • Retaliation against whistleblowers: Attempts to silence or punish employees for reporting issues.	followed by disciplinary action or contract termination. • External monitoring of situation post-case-resolution.	business days of receipt of a complaint Formulation of response: within 7 business days of receipt of a complaint
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Step 3: Preliminary assessment

A preliminary assessment of the case should be completed within 3 to 5 business days after receipt of the case, depending on the severity of the case as per Table 10.

During the preliminary assessment phase contact will be established with the aggrieved party to gather additional information on the case and the desired method for resolution. Preparatory contacts and arrangements can be made to inform a plan for putting in place an appropriate action. For light cases, the preliminary assessment period may serve as a resolution phase, if simpler remedial actions can be arranged. If immediate remediation is not possible, the preliminary assessment will document the options for remediation and seek any additional information, approvals that are required prior to start the implement of remedial action.

Step 4: Notification of action

A notification of action, in response to the grievance case shall be communicated to the aggrieved party within 5 to 10 business days after receipt of a complaint. The notification of action will include information from the grievance mechanism on the proposed resolution of the case.

After receiving a notification of action from the grievance mechanism, the aggrieved party has the choice of accepting the proposed action or to engage in dialogue with the grievance mechanism representative for adaptation of the action to the satisfaction of the aggrieved party.

Step 5: Formulation and implementation of a response

Within 7 to 20 business days upon receipt of a complaint, timeframe depending on severity of the case, a final resolution should have been formulated and be communicated by the grievance mechanism to the aggrieved party, allowing measures for corrective action to be implemented.

At this point, the grievance mechanism representative shall submit the plan for the corrective action into the central grievance record, using a form (available in Annex 7) to be submitted to <https://www.fdaportal.online/index.html>; +231 886 511 134/+231 777 282 838 or FDA Central Office Whein Town Mount Barclay Liberia

Step 6: Implementation of corrective action, monitoring and case closure

Corrective action or activities to remediate a case can take different amounts of time, depending on the severity of the case and does not have an official deadline. When cases are closed it will be compulsory for the level managing the grievance case to submit a case closure form (available in Annex 8) to <https://www.fdaportal.online/index.html>; +231 886 511 134/+231 777 282 838 or FDA Central Office Whein Town Mount Barclay Liberia. This will allow to track open and closed cases in the grievance and redress system.

The aggrieved party will at this point be given a feedback form (available in Annex 9) where he/she can submit feedback on his/her satisfaction with the overall grievance process. Worker grievance satisfaction forms shall be submitted to <https://www.fdaportal.online/index.html>; +231 886 511 134/+231 777 282 838 or FDA Central Office Whein Town Mount Barclay Liberia



Special considerations and referral procedures for severe cases

Sensitive high-risk cases related to Legal & Ethical Violations (such as sexual harassment, exploitation, or abuse, workplace discrimination, forced labor, human trafficking, or exploitative working conditions, child labor involvement or violations, serious safety risks that have led to injuries or fatalities, retaliation against whistleblowers etc.) require special considerations and may require referrals for remediation and support measures, such as medical or psychosocial support by specialized service providers. For high-risk cases involving children (child labor, sexual exploitation or abuse, violence) there are statutory requirements to involve professionals from Ministry of Gender Children and Social Protection and/or Police, as defined in the Children Act 2011.

The project will establish collaboration protocols with relevant statutory and professional services for such cases to get tailored support and remediation, outside of the project worker grievance mechanism, should such support be needed. Professional or statutory structures will work to implement remediation plans for the victim/survivor and will maintain confidentiality on the work undertaken. The project will ensure sufficient resources for remediation, as defined in case management plans defined by statutory agencies, or as defined by courts, until the case has been fully remediated and can be closed.

10. CONTRACTOR MANAGEMENT

LiFE-P is overall responsible to ensure that, contractors and third parties who mobilize and engage workers as labor force on the project:

- Are legally constituted and reliable entities
- Are aware of and contractually obliged to uphold the policies established under section six (6).
- Sign the Project Code Conduct available in Annex 2.
- Develop labor management procedures that are appropriate to the project and in compliance with the provisions of ESS2.
- Keep a register of workers called "employer register" that should include location of the work, workers' names, dates of birth, job title, job description and reporting lines in the company's hierarchy for each employee.
- Manage and monitor their sub-contractors in accordance with ESS2 and Liberia's legislations and regulations, including uphold the policies established in section six (6), sign the code of conduct and keep a register of workers that includes location of the work, workers' names, dates of birth, job title, job description and reporting lines in the company's hierarchy for each employee.
- Timely reporting of incidents and accidents and provide information as requested for the WB ESIRT procedure
- Register with the Ministry of Labor
- Comply with EPA and MOL inspections

LiFE-P will monitor the performance of contractors and third parties and can, at any time inspect their subcontractors through announced or un-announced site visits, review of documents, employer register and any other documentation of relevance to the project implementation.



11. COMMUNITY WORKERS

Community workers do not need to be engaged in the project in writing, through an employment contract. A community worker shall:

- Offer their services voluntarily.
- Be appropriately trained for the work to be performed in accordance with general and industry-specific Environmental, Health and Safety Guidelines (EHSG).
- Be offered relevant tools, safety equipment and safety briefings to perform the work by the project and free of charge to the worker.
- Be given tasks that must be non-hazardous.
- Upon engagement of community workers, the project will clearly identify the terms and conditions on which community labor will be engaged, including amount and method of payment and times of work *payment amounts are not known at this stage, typical payment methods include Mobile money transfer/ Cash payment (Community workers in remote areas without mobile network coverage or access to mobile banking) and 7:00 AM — 4:00 PM with a 1-hour midday rest break (8 working hours per day).*

The project FDA PIU will conduct regular monitoring of community work to verify that these requirements are fulfilled.

Community workers have access to the grievance mechanism through the following entry point: add information on how a community worker can submit a grievance case to the worker grievance mechanism, e.g., a central telephone number).

12. PRIMARY SUPPLY WORKERS

Primary supply workers, employed by contractors to the project, respond and report to the contractors with whom they have a contract. The project will ensure to hire contractors with good reputation and will monitor that they uphold Decent Work Act 2015, and ESS2 requirements, including that primary supply workers receive written contracts by their employer that outlines wages, benefits and working conditions, and otherwise uphold the requirements of the Decent Work Act 2015. Suppliers must be screened and sign Codes of Conduct.

The project FDA PIU will conduct random checks and regular audits to verify that these requirements are fulfilled, and that all the policies and procedures as outlined in this LMP are implemented as planned. Primary supply workers have access to the grievance mechanism through the entry point of its employer, or directly through the FDA PIU as per the contact details provided under the Grievance and Redress section.



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ANNEXES FOR ESMF



APPENDICES

Appendix 1. Environmental and Social Screening Checklist

PART A: SUBPROJECT IDENTIFICATION

Field	Details
Subproject / Activity Title	
Component and Sub-component	
Subproject Reference Number	
Subproject Proponent / Implementing Entity	
County and District	
CFMA Name (if applicable)	
GPS Coordinates of Activity Area	
Estimated Total Area of Physical Footprint (ha)	
Estimated Contract / Subproject Value (USD)	
Anticipated Start Date	
Anticipated Duration	
Screening Completed By (Name and Title)	
Date of Screening	
Date of Site Visit (if conducted)	
Community Consultation Conducted (Yes / No)	
Date(s) of Community Consultation	

PART B: DESCRIPTION OF PROPOSED ACTIVITY

Field	Details
Brief Description of the Proposed Activity	
Type of Activity (select all that apply) Civil works / Land clearance / Plantation / Restoration / Logging / Community IGA / Training / Advisory / Other	
Physical Works Involved (Yes / No)	
Land Disturbance Involved (Yes / No)	
Estimated Workforce Size and Composition	
Source of Labor (local / migrant / mixed)	
Materials and Equipment to be Used	
Waste Types Expected to be Generated	

PART C: EXCLUSION LIST CHECK (See Chapter of the ESMF)

PART D: ENVIRONMENTAL SCREENING

D1: Location and Land Use

#	Screening Question	Yes	No	Unknown	N/A	Notes / Details
D1.1	Is the proposed activity located within or immediately adjacent to (within 1 km of) a legally gazetted Protected Area (Sapo NP, Gola Forest NP, Grebo-Krahn NP, East Nimba SNR,					



	Piso Lake MUR)?					
D1.2	Is the proposed activity located within or adjacent to a Proposed Protected Area (Foya, Kpo Mountains, Krahn-Bassa)?					
D1.3	Is the proposed activity located within or adjacent to a formally established CFMA?					
D1.4	Is the proposed activity located in an area with high biodiversity value, critical habitat, or areas known to support endangered, vulnerable, or near-threatened species (IUCN Red List)?					
D1.5	Is the proposed activity located within or adjacent to (within 100 meters of) a river, stream, lake, wetland, mangrove, or other surface water body?					
D1.6	Is the proposed activity located in an area identified as a key watershed or water recharge zone?					
D1.7	Is the proposed activity located on steep slopes (>15% gradient) that are susceptible to erosion and landslide risk?					
D1.8	Is the proposed activity located in an area of primary or high-density natural forest (canopy cover >60%)?					
D1.9	Is the proposed activity located in an area currently used for shifting cultivation, subsistence agriculture, or other community food production?					
D1.10	Is the proposed activity located in a flood-prone area or area susceptible to seasonal inundation?					

D2: Physical Works and Land Disturbance

#	Screening Question	Yes	No	Unknown	N/A	Notes / Details
D2.1	Does the activity involve clearing of natural vegetation over an area greater than 1 hectare?					
D2.2	Does the activity involve significant earthworks, excavation, or grading?					
D2.3	Does the activity involve construction or rehabilitation of buildings, structures, or facilities?					
D2.4	Does the activity involve construction or rehabilitation of roads, tracks, or access paths?					
D2.5	Does the activity involve construction of any water crossing, culvert, or drainage infrastructure?					
D2.6	Does the activity involve the use of heavy machinery (bulldozers, excavators, skidders, trucks)?					



D2.7	Does the activity involve the storage, use, or disposal of fuel, lubricants, or chemicals on site?					
D2.8	Does the activity involve the generation of construction, demolition, or processing waste?					
D2.9	Does the activity involve the generation of liquid effluent, wastewater, or process water requiring management or disposal?					
D2.10	Does the activity involve the use or procurement of pesticides, herbicides, or other agro-chemicals?					

D3: Forestry and Ecological Impacts

#	Screening Question	Yes	No	Unknown	N/A	Notes / Details
D3.1	Does the activity involve commercial timber harvesting or reduced-impact logging (RIL) operations?					
D3.2	Does the activity involve the establishment of tree plantations covering an area greater than 50 hectares?					
D3.3	Does the activity involve the rehabilitation of existing plantations covering an area greater than 100 hectares?					
D3.4	Does the activity involve the restoration of degraded forest or land covering an area greater than 50 hectares?					
D3.5	Does the activity involve the harvesting, processing, or commercial use of Non-Timber Forest Products (NTFPs)?					
D3.6	Does the activity risk disturbance to known wildlife corridors connecting protected areas or forest blocks?					
D3.7	Does the activity involve the introduction of non-native tree or crop species into the project area?					
D3.8	Does the activity involve the use of fire for land preparation (prescribed burning)?					
D3.9	Could the activity increase the risk of uncontrolled wildfire in surrounding forest or community land?					
D3.10	Could the activity generate significant noise or vibration that may disturb wildlife in adjacent sensitive habitat?					

D4: Water, Soil, and Air Quality

#	Screening Question	Yes	No	Unknown	N/A	Notes / Details
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D4.1	Could the activity result in sedimentation or increased turbidity of nearby water bodies from soil disturbance or construction runoff?					
D4.2	Could the activity result in contamination of surface water or groundwater from fuel, chemical, or waste spills?					
D4.3	Could the activity result in significant soil erosion or land degradation, particularly on slopes or near watercourses?					
D4.4	Could the activity generate significant dust, particulate matter, or air emissions affecting nearby communities or sensitive ecosystems?					
D4.5	Could the activity affect the quality or availability of community drinking water sources?					
D4.6	Could the activity generate significant noise levels affecting nearby community settlements, schools, or health facilities?					
D4.7	Does the activity involve the generation of e-waste or other electronic equipment requiring specialized disposal?					
D4.8	Could the activity generate hazardous waste (used oils, chemicals, medical waste, batteries) requiring specialized management?					

PART E: SOCIAL SCREENING

E1: Land, Tenure, and Resettlement

#	Screening Question	Yes	No	Unknown	N/A	Notes / Details
E1.1	Is the land on which the activity will be implemented legally owned by the project proponent or formally allocated to the project?					



E1.2	Is the land subject to any formal or customary tenure dispute or competing claim?					
E1.3	Are there any occupants, users, or rights-holders on the land who are not the formal owners?					
E1.4	Will the activity require the physical displacement of any households, structures, or enterprises?					
E1.5	Will the activity result in the economic displacement of individuals (loss of crops, trees, livelihoods, or access to resources) without full compensation?					
E1.6	Will the activity restrict or limit community or individual access to forests, farmland, water, or other natural resources currently used for subsistence or income?					
E1.7	Does the activity area overlap with community land that has not yet been formally surveyed, demarcated, or titled under the Land Rights Law (2018)?					
E1.8	Has FPIC been obtained from all affected communities for activities on or affecting community land or resources?					
E1.9	Are there any unresolved boundary disputes between the proposed activity area and adjacent community or private land?					

E2: Community Impacts and Vulnerable Groups

#	Screening Question					
E2.1	Are there communities or households in the immediate vicinity of the proposed activity area that may be directly affected by it?					
E2.2	Estimated number of potentially affected people:					
E2.3	Are there indigenous peoples, traditional forest-dependent communities, or ethnic minority groups in or near the activity area whose rights or livelihoods may be affected?					
E2.4	Are there particularly vulnerable groups in the area — including female-headed households, persons with disabilities, elderly persons, or landless					



	households — who may be disproportionately affected?					
E2.5	Are there groups whose livelihoods are highly dependent on the specific natural resources that the activity will affect?					
E2.6	Does the activity involve benefit-sharing or revenue distribution mechanisms (e.g., matching grants, IGA revenues, ecotourism PPP investment proceeds) that may generate intra-community conflict if not managed equitably?					
E2.7	Could the activity generate community tension or conflict with neighboring communities over resource use, boundaries, or benefits?					
E2.8	Could the activity affect access to or use of community infrastructure — including roads, water points, schools, health facilities, or markets?					
E2.9	Does the activity require temporary or permanent closure of any community access routes or public pathways?					

E3: Gender and Inclusion

#	Screening Question	Yes	No	Unknown	N/A	Notes / Details
E3.1	Does the activity specifically target women's participation and leadership in governance, labor, and benefit-sharing?					
E3.2	Are there specific barriers that may prevent women from participating equitably in the activity (cultural norms, mobility constraints, time burdens, limited collateral)?					
E3.3	Are there specific mechanisms in place to ensure that women receive at least 30% representation in relevant governance bodies (e.g., CFMBs)?					
E3.4	Are the needs, priorities, and constraints of women explicitly reflected in the subproject planning and investment choices?					
E3.5	Does the activity include specific targeting of youth (18–25 years) in employment, training, or					



	livelihood opportunities?					
E3.6	Does the activity include specific provisions for the inclusion of persons with disabilities?					

E4: Cultural Heritage

#	Screening Question	Yes	No	Unknown	N/A	Notes / Details
E4.1	Are there known sacred forests, groves, or sites of spiritual or religious significance within or adjacent to the proposed activity area?					
E4.2	Are there known Poro or Sande society forests or ritual areas within or adjacent to the proposed activity area?					
E4.3	Are there known burial grounds, cemeteries, or ancestral sites within or adjacent to the proposed activity area?					
E4.4	Are there known archaeological sites, historical structures, or artifacts within or adjacent to the proposed activity area?					
E4.5	Are there trees of individual cultural, medicinal, or sacred significance within the proposed activity footprint?					
E4.6	Does the activity involve the commercial use of traditional knowledge or intangible cultural heritage (e.g., NTFP preparation, traditional harvesting practices, medicinal plant knowledge)?					
E4.7	Is the proposed activity area located within 500 meters of a site listed on national cultural heritage registers or identified in MICAT documentation?					
E4.8	Have community elders and traditional leaders been consulted on the cultural heritage sensitivity of the proposed activity area?					

E5: Labor and Occupational Health and Safety

#	Screening Question	Yes	No	Unknown	N/A	Notes / Details
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E5.1	Estimated total number of workers to be engaged (all categories):					
E5.2	Will the activity engage contracted workers through civil works or service providers?					
E5.3	Will the activity engage community workers through informal or community labor arrangements?					
E5.4	Will the activity engage workers sourced through labor brokers, intermediaries, or agents?					
E5.5	Will the activity attract significant in-migration of workers from outside the host community (labor influx)?					
E5.6	Does the activity involve work in or near forest environments with significant OHS risks (chainsaw operations, tree felling, log extraction, wildlife encounters)?					
E5.7	Does the activity involve construction or civil works with significant OHS risks (working at height, excavation, heavy machinery, electrical works)?					
E5.8	Does the activity involve operation of industrial processing equipment (sawmilling, kiln drying, veneer processing, grading) with significant OHS risks?					
E5.9	Does the activity involve the use or handling of hazardous chemicals, pesticides, or other substances requiring OHS protection?					
E5.10	Are there risks of child labor in community-based activities (plantation works, IGA subprojects, restoration activities)?					
E5.11	Are there risks of forced or compulsory labor through community governance structures or CFMB leadership?					
E5.12	Are there specific risks of GBV or SEA associated with the activity — particularly in contexts of labor influx or remote work locations?					
E5.13	Does the proponent have documented HR policies, employment contracts, and a grievance mechanism for workers?					



E6: Stakeholder Engagement and Grievance

#	Screening Question	Yes	No	Unknown	N/A	Notes / Details
E6.1	Have all potentially affected communities been identified and engaged in consultations on the proposed activity?					
E6.2	Have women and vulnerable groups been specifically included in consultations on the proposed activity?					
E6.3	Have any concerns or objections been raised by affected communities regarding the proposed activity?					
E6.4	If concerns have been raised, have they been documented and addressed to the satisfaction of the affected parties?					
E6.5	Is a community-level grievance mechanism in place and accessible to all affected parties — including women and persons with disabilities?					
E6.6	Are affected communities aware of the project-level GM and how to access it?					

PART F: REGULATORY AND PERMIT STATUS

#	Screening Question	Yes	No	Unknown	N/A	Notes / Details
F1	Does the proposed activity fall within the categories listed in EPML Annex I requiring an EPA EIA License or Certificate of Approval?					
F2	Has an EPA EIA License application been initiated or submitted?					
F3	Has an EPA EIA License, Certificate of Approval, or FONSI been obtained?					
F4	Does the activity require a Forest Use Permit, Forest Management Contract approval, or other FDA regulatory authorization?					



F5	Does the activity require a Water Use Permit for abstraction of water from surface or groundwater sources?					
F6	Does the activity require any county or district government permits or approvals (e.g., road closure, construction permit)?					
F7	Are there any outstanding compliance issues or enforcement actions associated with the proponent or the proposed activity site?					

PART G: RISK CATEGORIZATION AND REQUIRED E&S INSTRUMENTS

G1: Risk Scoring Guide

Review all responses in Parts D, E, and F. Use the criteria below to assign the overall risk category for the proposed subproject. Where responses indicate risks across multiple categories, the highest applicable risk category shall apply.

Risk Category	Trigger Conditions
LOW	No YES responses in Parts D or E with significant impact potential; no EPA permit required (F1 = No); no physical works of significance; no sensitive environmental or social receptors identified
MODERATE	One or more YES responses in Parts D or E indicating limited, site-specific, reversible impacts; minor to moderate civil works; no critical habitat, PA, or significant cultural heritage; EPA Certificate of Approval or FONSI may be required
SUBSTANTIAL	Multiple YES responses in Parts D or E indicating significant but manageable impacts; moderate to large civil works; proximity to sensitive areas or communities; significant labor influx; resource access restriction; EPA EIA License required
HIGH	YES responses indicating potentially irreversible impacts; large-scale physical works; within or adjacent to critical habitat or PA; resettlement; significant cultural heritage; FPIC required; World Bank Prior Review mandatory

G2 — Risk Categorization Decision

Field	Response
Assigned Risk Category	LOW / MODERATE / SUBSTANTIAL / HIGH
Primary Basis for Risk Category Assignment	
Key Environmental Risks Identified	
Key Social Risks Identified	
Key Labor and OHS Risks Identified	
Key Cultural Heritage Risks Identified	

G3: Required E&S Instruments

Based on the assigned risk category, the following E&S instruments are required. Check all that apply.

E&S Instrument	Required	Not Required	Notes



Environmental Codes of Practice (ECOPs)			
Site-specific Environmental and Social Management Plan (ESMP)			
Scoped Environmental and Social Impact Assessment (ESIA)			
Full Environmental and Social Impact Assessment (ESIA)			
Contractor ESMP (C-ESMP)			
Occupational Health and Safety (OHS) Plan			
Waste Management Plan			
Stakeholder Engagement Plan (SEP)			
Labour Management Procedures (LMP) provisions			
Labor Influx Management Plan			
Resettlement Plan (RP)			
Biodiversity Management Plan			
Cultural Heritage Walkover Survey Report			
Cultural Heritage Management Plan			
Chance Find Procedure			
Process Framework (resource access restriction)			
Wildfire / Fire Management Plan			
GBV / SEA Action Plan			
Pest Management Plan			
EPA EIA License / Certificate of Approval / FONSI			
Other (specify):			

PART I: SIGN-OFF AND APPROVAL

Role	Name	Signature	Date
Completed by (PIU E&S Specialist)			
Reviewed by (PIU Environmental Specialist)			
Reviewed by (PIU Social Specialist)			
Approved by (PIU Coordinator)			
World Bank Task Team Notified (if Substantial or High risk)			

PART J: SUPPORTING DOCUMENTS ATTACHED

#	Document	Attached (Yes / No)
J1	Site map or sketch with GPS coordinates	
J2	Photographs of the proposed activity site	
J3	Records of community consultations conducted during screening	
J4	Copies of existing EPA permits or correspondence	
J5	Land tenure documentation (deed, allocation letter, community resolution)	
J6	Relevant sections of Community Forest Management Plan (CFMP)	
J7	Preliminary cultural heritage information from community consultation	



J8	Draft Terms of Reference for required E&S instrument (if Substantial or High risk)	
J9	Other relevant documents (specify):	

Baseline Environmental and Social Sensitivities

Effective environmental and social risk management under LiFE-P requires the application of standard assessment procedures it requires that the characteristics of the receiving environment and affected communities shape how proposed subprojects are categorized, what instruments are required, and how mitigation is designed and sequenced.

Three categories of baseline sensitivity are of particular significance across LiFE-P's diverse geographic footprint: critical habitat classifications, land tenure arrangements, and community vulnerability. These sensitivities are assessed through the ESMF Screening Checklist and the project's socioeconomic and environmental baseline surveys, and their findings directly guide the level of assessment required, the instruments to be prepared, and the sequencing of mitigation measures before any subproject activity with adverse impact potential may commence.

- **Critical habitat classifications** function as a primary determinant of risk categorization. Subprojects located within or adjacent to Liberia's gazetted protected areas, proposed protected areas, or areas supporting IUCN Red List species are automatically escalated to Substantial or High risk requiring higher-tier assessment instruments including Biodiversity Management Plans and establishing avoidance as the first step in the mitigation hierarchy. Biodiversity baseline surveys must verify critical habitat status before any risk category is finalized.
- **Land tenure arrangements** are integrated into the screening process through dedicated checklist questions covering land ownership clarity, boundary demarcation, overlapping claims between CFMAs and FMC concessions, and the presence of informal or customary users. Where tenure is unclear, disputed, or unrecognized under the Land Rights Law (2018), the subproject's social risk category is escalated independently of its environmental profile, requiring instruments including Process Frameworks (prepared during project preparation) and documented FPIC and a land tenure mapping exercise to resolve gaps before instrument preparation proceeds.
- **Community vulnerability** has been incorporated through social sensitivity screening questions identifying traditional forest-dependent communities, female-headed households, persons with disabilities, and subsistence-dependent households in and around proposed subproject areas. Where such groups are present, vulnerability results would require social instruments and mitigation measures to site-specific vulnerability profiles .



Appendix 2: Flow chart (ESIA Process of the EPA (2022)/Screening and risk-based E&S instruments)

This Annex presents the ESIA process, core procedural tools that operationalize the Environmental and Social Management Framework (ESMF) for LiFE-P.

ESIA Process of the EPA (2022)

The Liberia EPA's ESIA Revised Procedural Guidelines (2022) are based in the EPA Act (2003) and the EPML (2003). The processes are as follows:

- **Step 1: Application for ESIA permit:** The proponent submits a formal application package addressed to the Executive Director of the EPA. This initiates the formal regulatory process and triggers EPA's response to the proponent on next steps.
- **Step 2: Submission of Project Brief:** Following EPA's response, the proponent develops and submits an Environmental Project Brief providing initial information about the proposed project including its nature, location, scale, and potential environmental and social impacts to enable the EPA to make a screening determination.
- **Step 3: Screening:** The EPA reviews Project Brief to determine the level of assessment required. If the project is unlikely to have significant environmental or social impacts, a permit may be issued or denied directly. If significant impacts are likely, the proponent is required to proceed to a full ESIA. For borderline cases, the EPA may request additional information before deciding on the appropriate pathway.
- **Step 4: Notice of Intent** – If the project, following screening, is subject to a full ESIA, a notification is made through the media describing the proponent's intention to engage in an undertaking.
- **Step 5: Scoping** Where a full ESIA is required, scoping is conducted to identify the specific environmental and social impacts likely to arise during construction and operation phases. Scoping involves consultations with relevant stakeholders and affected communities and forms the basis for the Terms of Reference (ToR) or methodology for the ESIA study. The EPA reviews and approves the scoping report and ToR before the ESIA study commences.
- **Step 6: E&S Assessment Process** The proponent engages qualified consultants to conduct the detailed ESIA study in accordance with the approved ToR. This includes baseline data collection, impact prediction and evaluation, design of mitigation measures, preparation of an Environmental and Social Management Plan (ESMP), and public consultation and participation with affected communities and relevant stakeholders. The ESIA report integrates all findings and mitigation commitments.
- **Step 7: Review:** Once the ESIA report is submitted to the EPA (along with required non-refundable permit fees), the EPA's ESIA Unit conducts a preliminary review to ensure all requirements are met. The report is then presented to the ESIA Technical Review Committee, a cross-sectoral body that assesses adequacy, identifies gaps, advises on risks, and makes recommendations to the Executive Director on whether the undertaking should be accepted (conditionally or unconditionally), returned for revision, or rejected.
- **Step 8: Public Hearing:** After the Technical Review Committee has reviewed the report and comments from relevant ministries and agencies have been received (or a 30-day notice period for public comments has elapsed), the EPA determines whether a public hearing is required. A public hearing is triggered where: (a) the public notice generates significant public reaction; (b) the project involves dislocation, relocation, or resettlement of communities; or (c) the EPA considers the project could have extensive and far-reaching environmental effects. The EPA



invites relevant stakeholders and the public to the hearing, and outcomes and concerns expressed are used to finalize the ESIA report.

- **Step 9: Decision Making** Based on the public hearing outcomes and all comments received, the EPA makes a final decision. The EPA may: (a) approve the project unconditionally; (b) approve it conditionally, requiring redesign or additional measures; (c) refer it back to the applicant for further study or additional information; or (d) reject the application where the project may cause significant or irreversible environmental damage. The EPA aims to issue a decision within 14 days for projects not requiring a full ESIA, and within three months of receiving the ESIA report for projects that do.
- **Step 10: Environmental Permit Issuance** Where the project is approved, an environmental permit is issued. The permit is a regulatory document specifying the conditions and restrictions the proponent must comply with to minimize environmental and social impacts. The permit is time-bound and subject to conditions, including compliance with the approved ESMP.
- **Step 11: Disclosure** Once the EPA (and, for World Bank-financed projects, the Bank) clears the ESIA, the proponent/implementing agency discloses the report in-country through appropriate media including newspapers, radio (in English and local languages), county offices, project sites, and the EPA's own channels and notifies the World Bank to enable disclosure on its external website
- **Step 12: Follow-up - Compliance Monitoring and Enforcement:** This is the implementation stage. The EPA's Department of Compliance and Enforcement conducts regular announced and unannounced compliance monitoring and inspections at project sites to verify that mitigation measures in the ESMP are being implemented effectively, track environmental impacts, and carry out environmental audits. Monitoring teams comprising environmental compliance officers and scientists are deployed nationwide, and proponents are required to provide EPA teams with unimpeded access to facilities and documentation. Non-compliance is documented and reported, and corrective actions are required

START: Subproject/activity proposed to PIU or Participating Intermediary			
↓			
STEP 1 – Exclusion list check: Apply LiFE-P E&S Exclusion List (ESMF Annex [Y]).			
Decision: Any exclusion criteria triggered?			
YES → STOP: Subproject rejected. Document decision in writing; record in E&S register; notify proponent.		NO → proceed	
↓			
STEP 2 – E&S screening checklist: Complete Screening Checklist (ESMF Annex [Z]) and submit to PIU Environmental Specialist.			
↓			
STEP 3 – Risk categorization: Assign LOW / MODERATE / SUBSTANTIAL / HIGH risk based on checklist.			
LOW → Step 4A Apply ECOPs; confirm	MODERATE → Step 4B Site-specific ESMP + basic	SUBSTANTIAL → Step 4C Scoped ESIA or detailed	HIGH → Step 4D Full ESIA package + plans;



national law compliance; PIU confirms low risk (3–5 days).	OHS; contractor C-ESMP; EPA CoA/FONSI in parallel; disclose ESMP (≥7 days).	ESMP + supporting plans; EPA EIA License in parallel; WB Task Team consultation; disclose draft (≥14 days).	EPA EIA License; submit to World Bank for Prior Review .
HIGH RISK (Step 4D) – Prior Review decision			
Instrument Review cleared? YES → disclose full ESIA package (≥30 days) and proceed to implementation authorization once all conditions are met.		Instrument Review cleared? NO → return instrument for revision; no works may commence .	
↓ STEP 5 – Implementation: Implement per cleared E&S instruments/ECOPs; monthly ESHS reports; PIU oversight; maintain E&S and GM registers.			
↓ STEP 6 – Monitoring & reporting: Quarterly E&S monitoring reports; semi-annual report to World Bank; serious incidents within 48 hours.			
↓ END – Project closure: Completion ESHS audit report; PIU confirms obligations fulfilled; closure confirmed.			

Consolidated Reference Table: Risk Category, E&S Instruments, Approval Authority, and Disclosure Requirements

Risk	Typical subprojects (examples)	Core E&S instruments	Approval / EPA / Disclosure
LOW	Capacity building; IT in existing offices; consultations; governance/analytical work	ECOPs; compliance with national law	PIU Environmental Specialist confirms risk/ECOPs. No EPA permit (confirm case-by-case if FONSI needed). Inform communities; no formal disclosure period.
MODERATE	Small-scale construction (e.g., CFMB offices); woodlots; IGAs; nurseries; minor plantation maintenance; enterprise capital investments	Site-specific ESMP; basic OHS Plan; C-ESMP (civil works); LMP provisions (as applicable)	PIU Environmental Specialist clears ESMP/C-ESMP (target 7 days); PIU Social Specialist confirms LMP. EPA Certificate of Approval or FONSI may apply. Share ESMP min. 7 days pre-works; post locally.
SUBSTANTIAL	RIL in clustered CFMAs; forest restoration; facility rehabilitation; protected area infrastructure; PPP feasibility; plantation rehabilitation	Scoped ESIA or detailed ESMP; SEP; OHS; waste; cultural heritage survey + chance finds; labor influx plan (if applicable); Process Framework (if access restrictions); C-ESMP	PIU reviews then consult World Bank (WB confirms adequacy). Full EPA EIA License required pre-works (target 30–45 days). Disclose drafts min. 14 days (FDA portal + communities) with documented consultations.
HIGH	Major PPP infrastructure in sensitive areas; (roads/ports/sawmill); large-scale plantation rehab in biodiversity/tenure-sensitive areas	Full ESIA + comprehensive ESMP; RAP/RPF (ESS5); Biodiversity plan (ESS6); SEP + FPIC documentation; OHS; wildfire; cultural heritage plan; GBV/SEA action plan; waste; C-ESMP	World Bank prior review mandatory (written clearance before financing/works). Full EPA EIA License mandatory (target 45–60 days). Disclose drafts min. 30 days (FDA portal + WB external site + communities); address substantive concerns.

Differentiation of Program-Level and Subproject-Level Environmental and Social Requirements



Instrument	Scope	Applicable LiFE-P Components	Prepared By	Disclosure Requirement
Preparatory Program/Policy Level E&S Instruments				
Environmental and Social Management Framework (ESMF)	Entire project — all components, subcomponents, and subproject types	All components C1, C2, C3	PIU E&S Specialists prepared at project preparation	Disclosed on FDA Public Portal and World Bank external website before project activities commence
Resettlement Framework (RF)- A standalone Instrument	All project activities with potential land acquisition, resettlement, or resource access restriction risks regardless of whether specific impacts are known at preparation	C2.1 (CFMA establishment, RIL); C2.2 (plantation rehabilitation, restoration); C2.3 (ecotourism PPP investment construction, PA management); C3.3 (PPP roads, ports, sawmills)	PIU Social Specialist, with legal and resettlement specialist support	Disclosed on FDA Public Portal and World Bank external website at project preparation
Stakeholder Engagement Plan (SEP)	All project activities across all components and geographic areas from preparation through closure	All components C1, C2, C3	PIU Social Specialist	Disclosed before any stakeholder engagement activities commence
Labour Management Procedures (LMP)	All categories of workers engaged under LiFE-P direct, contracted, community, and primary supply workers across all components and phases	All components C1, C2, C3	PIU Social Specialist	Disclosed before engagement of any workers; included in all contractor and PI agreements
Strategic Environmental and Social Assessment (SESA)	Legal and regulatory reform activities-harmonization of NFRL (2006), CRL (2009), LRA (2018), and related regulations; FDA institutional governance reform	C1.1 (regulatory harmonization); C1.2 (FDA institutional reform)	PIU, with analytical and multi-stakeholder consultation support integrated into reform package preparation	Publicly disclosed as part of reform consultation process; findings integrated into amendments and regulatory instruments
Sub project-Level E&S Instruments				
Environmental Codes of Practice (ECOPs)	Specific low-risk activity at a specific location	Capacity building; IT infrastructure at existing offices; knowledge exchange visits; community consultations	Subproject proponent — ECOPs sourced from ESMF annex	Standard community information sharing; no formal public disclosure period



		without physical footprint		
Site-Specific Environmental and Social Management Plan (ESMP)	Specific Moderate risk physical investment at a specific location	CFMB office construction; small woodlots; community IGA subprojects; minor plantation maintenance; enterprise capital investments (equipment, storage); nursery establishment	Subproject proponent — supported by PIU E&S Specialist or PI E&S Focal Point	Disclosed to affected communities in accessible format and local language minimum 7 days before works; posted at CFMB office
ESIA with Associated Instruments e.g Biodiversity Management Plan (BMP)	Specific High risk physical investment — comprehensive multidisciplinary assessment	ecotourism PPP investment at Gola Forest NP and Piso Lake MUR;	Qualified multidisciplinary ESIA team; TOR agreed with World Bank before engagement	Full draft ESIA package disclosed on FDA Public Portal, World Bank external website, and community locations minimum 30 days; documented meaningful consultation including women and vulnerable groups
Resettlement Plan (RP)	Specific affected households and assets at a specific location	ecotourism PPP investment affecting community land or structures; PPP road or port construction requiring land acquisition; plantation rehabilitation displacing existing users	PIU Social Specialist and qualified resettlement specialist	Disclosed to affected persons before implementation; shared with World Bank
Contractor ESMP (C-ESMP)	Specific civil works contract at a specific construction site	All civil works: ecotourism PPP investment; CFMB offices; FTI/SEC rehabilitation; PA infrastructure	PIU Environmental Specialist clears before works commence; no World Bank individual review unless part of High risk subproject	submitted to PIU; shared with community as part of community engagement





Appendix 3: ESIA Report Template

To be prepared during implementation as needed for other subprojects with potential environmental and social risks. These assessments will evaluate potential risks and impacts and prescribe mitigation measures.

Chapter Heading	Content Outline
Executive Summary	Concisely discusses project overview, key risks significant findings and recommended actions
Chapter One: Introduction/Background	• Project Overview • Justification for the Study • Study Objective • Scope of Work • The Proponent - FDA PIU • Report Structure
Chapter Two: Policy, Legal and Regulatory Framework	• National Policies • Legislation • Regional and International Conventions to which Liberia is Party • World Bank's Environmental and Social Framework (ESF) - The World Bank Group Environmental Health and Safety (EHS) Guidelines. • Comparative matrix between national laws and the WB ESF, identify gaps and propose measures to address them • Institutional Framework for E&S; any permitting and approval processes required for the project.
Chapter Three: Sub-Project Description	• Brief summary of the sub-project overview Project Description by community: • Geographical location with maps and coordinates • Project activities to be financed and scale and scope • Details of site layout, access etc
Chapter Four: Environmental and Social Baseline Data	Desk review findings Environmental Baseline Condition: • Environmental Baseline - Climate and Meteorology - Geology - Topography - Soil - land use - Air quality - Water resources and Hydrological conditions - Biodiversity - Existing infrastructure; utilities (power, water supply, waste management etc) - Noise - Cultural and historical sites



Social Baseline

- Demographics
- Health
- Education
- Livelihoods
- Accessibility and access to services
- Social issues
- GBV issues
- Land ownership etc

Methodology shall be presented in the Appendix)

In case there are areas of high environmental sensitivity, include an and Vulnerability Analysis

Chapter Five: Stakeholder Engagement

- Stakeholder Identification
- Stakeholder Engagement Plan
 - Scoping Phase – Sensitization Stakeholder Engagement
 - Stakeholder Engagement during Baseline Data Gathering Documentation of Consultation Outcomes; feedback, concerns raised etc and any recommendations from the consultations which can be included in ESMP

Chapter Six: Analysis of Alternatives

- Project Alternatives
- Comparison of Alternatives (location, design, technology, costs etc)
- Evaluation matrix and preferred option

Chapter Seven: Potential Environmental and Social Risks and Impact

- Impact Evaluation Methodology
- Potential Impacts associated with project funded activities - positive or negative; direct or indirect, cumulative; associated; short-term; long term; residual; reversible/mitigatable or irreversible on
 - Env: Air, Water and Soil quality; Noise impacts; Land Use; impacts on biodiversity; green cover; materials management; waste management; any tangible cultural heritage; occupational health and safety;
 - Social: limitations of access; disruption of utilities; life and fire safety; community health and safety; social issues; GBV; conflict; gender and vulnerable groups; impact on intangible cultural heritage; resettlement or land acquisition (make reference to RP)
- Impacts shall be divided by pre-Construction; Construction; Post-Construction phases and Decommissioning Phase (only if applicable)
- Impact severity matrix
- Environmental and Social Risks and Impact and Mitigation Matrix (existing Plans such as LMP, GM and GBV Action Plan are referred to in this matrix)

Chapter Eight: Environmental and Social Management Plan

- Institutional Arrangements
 - Project Management Responsibilities
 - Project Implementation Unit
 - Construction Supervision Consultant
 - Contractor Responsibilities



- Impact Mitigation and Management Measures
 - Mitigation Matrix which includes mitigation measures; timelines; roles and responsibilities and detailed estimated costs
- Monitoring and Reporting Protocols (this will include any environmental monitoring testing requirements)
- Training and Capacity Building
- Budget for implementation of the ESMP (this will build on estimated cost of contractor ESMP; licenses, clearances, sample testing monitoring etc)
- Gender Action Plan
- Grievance mechanism

The ESIA will include templates for the following plans (these templates will provide guidance for the Contractors to develop Contractor ESMPs) – See appendix 19

- Solid and Hazardous Waste Management Plan
- Stakeholder Engagement Plan
- Labour Management Plan
- Camp Management Plan
- Traffic Management Plan
- Occupational Health and Safety
- Emergency Response Plan
- Incident reporting guidelines

Appendices

Include supporting documents such as data tables, maps, and technical reports, methodology for sampling etc, Sample Management Plan

Annex 1: ESIA Terms of Reference

Annex 2: ESIA Report Outline

Annex 3: Stakeholder Identification and Analysis

Annex 4: Stakeholder Engagement Attendance Record

Annex 5: General Environmental and Social Management Conditions for Construction Contracts

Annex 6: Project Occupational Health and Safety (OHS) Plan

Annex 7: Company Code Of Conduct Preventing Gender Based Violence And Violence Against Children

Annex 8: Manager's Code of Conduct on Preventing Gender Based Violence and Violence Against Children

Annex 9: Individual Code of Conduct Preventing Gender Based Violence and Violence Against Children

Annex 10: Waste Management Plan

Annex 12: Grievance Uptake Channels Information Sheet

Annex 13: Laboratory Data Statement of Result

Annex 14: Air Quality and Noise Monitoring

Annex 15: Environmental and Social Technical Clauses (ESTCs)



Appendix 4. Environmental and Social Code of Practices (ESCOP)

1. Objectives

This Environmental and Social Codes of Practice (ESCOP) is prepared to manage small environmental impacts during construction. The ESCOPs will apply to manage small-scale infrastructure investments which develop and support the project. ESCOP will be a mandatory part of the construction contract or bidding documents so that the contractor complies with environmental covenants. The FDA/PIU and construction supervisors will be responsible for monitoring compliance with ESCOP and preparing the required reports.

2. Responsibilities

The FDA/PIU and Contractors are the key entities responsible for implementation of this ESCOP. Key responsibilities of the PIU and the contractors are as follows:

(a) The FDA/PIU

- The FDA/PIU are responsible for ensuring that the ESCOP is effectively implemented. The FDA/PIU will assign a qualified staff to be responsible for checking implementation compliance of Contractors, include the following: (a) monitoring the contractors' compliance with the environmental plan, (b) taking remedial actions in the event of non-compliance and/or adverse impacts occur, (c) investigating complaints, evaluating and identifying corrective measures; (d) advising the Contractor on environment improvement, awareness, proactive pollution prevention measures; and (e) monitoring the activities of Contractors on replying to complaints.

(b) Contractor

- The contractor is responsible for carrying out civil works and informs FDA/PIU local authority and community about construction plans and risks associated with civil works. As such, the contractor is responsible for implementing agreed measures to mitigate environmental risks associated with its civil work.
- Contractors are required to obey other national relevant legal regulations and laws.

Part 1 – Contractor's Responsibilities

This is an example and is not necessarily a full treatment of all requirements for a specific project. For example, there might be reasons to have contractors deal with STDs, medical and hazardous waste (e.g. oil from vehicle or furnace repair and similar, oily rags).

Issue	Environmental and Social Prevention and Mitigation Measures
Contractor Awareness of E&S Risk Management	All contractors will be responsible for conducting their work activities in consideration of these ESCOPs. Failure to do so could result in penalties or dismissal.
Pre-Construction	



Initial Checklist	• That these ESCOPs have been reviewed by management and all workers. • Ensure all workers have appropriate PPE and are trained on potential health and safety risks related to their work. • Workers have signed the worker code of conduct. • Workers fully understand all prohibitions (e.g. illegal dumping of demolition material, use of alcohol by workers, etc.). • Consultation has been completed with the nearby community in regard to construction works and duration (working hours) or providing public information and site access. • All emergency procedures are developed, and workers are well informed.
Site Clearing	• All vegetation must be stripped from the area of construction. This has to be done very carefully. The valuable or reusable materials from the demolished construction should be kept as property of the health facility (health center or referral hospital) and should be stored in the storage area provided. • The Contractor shall dispose of all construction materials/rubbish from the demolition/construction away from the hospital property.
Set out of Works	• The Contractor shall set out the location of the works and clearly mark the location of corners with timber pegs. Offset pegs shall also be located at one-meter offsets so that all corner points can be located again after excavation of soil for the correct construction of footings.
Construction	
Construction Activities	• When conducting construction activities, including any destruction, the Contractor shall consider the following measures: • Prepare a management plan as to how to avoid or minimize environmental and social impact during construction activities. • Maintain an adequate unoccupied buffer zone around the work areas to allow for construction traffic. • Ensure proper signage is in place alerting residents and the public to any construction related risk. • Post warning signs on barricades, construction zones, and other areas limiting access to authorized personnel only. • Implement adequate measures during demolition of existing infrastructure to protect workers and the public from falling debris and flying objects. • Isolate work areas from occupied areas using physical barriers, negative pressurization of the construction or renovation area relative to occupied areas, and use HEPA or other filtration, where possible, to remove particulates. • Bag all construction debris and set aside designated and restricted waste drop or discharge zones for safe movement of wastes. • Conduct sawing, cutting, grinding, sanding, chipping or chiseling with proper guards and anchoring as applicable. • Use of temporary fall protection measures in scaffolds and on edges of elevated work surfaces, such as handrails and toe boards to prevent materials from being dislodged. • Provide all workers with safety glasses with side shields, face shields, hard hats, and safety shoes. • Hearing protection should be provided where excessive noise levels are present.



Supervision during construction	• The Project Engineer will supervise compliance with these ESCOP specifications. • Major non-compliance of these ESCOPs by the Contractor will be cause for suspension of works and other penalties until the non-compliance has been resolved to the satisfaction of the Project Engineer. Contractors are also required to comply with national and municipal regulations governing the environment, public health, and safety.
Dust Generation / Air Quality	• Use work practices and materials that result in little or no generations of airborne contaminants during construction or renovation activities, such as wet methods to suppress dust generation as well as paint and carpeting with low volatile organic compound emissions. • For indoor dust control, the Contractor may use air filters, purifiers, or vacuums. • Avoid burning or incineration of construction waste materials outside of the building. • Keep outdoor stockpile of aggregate/sand materials covered to avoid suspension or dispersal of fine soil particles during windy days or disturbance from stray animals. • Reduce the operation hours of generators /machines /equipment /vehicles as much as possible. • Undertake regular maintenance of generators, machinery and equipment and vehicles. • Control vehicle speed when driving through community are as so that dust dispersion from vehicle transport is minimized.
Water Quality and Availability	• Activities should not affect the availability of water for drinking and hygienic purposes. • No soiling materials, solid waste, toxic or hazardous materials should be poured or thrown into water bodies for dilution or disposal. • Provide toilets with a temporary septic tank at the construction site. The flow of natural waters should not be obstructed or diverted to another direction, which may lead to drying up of riverbeds or flooding of settlements.
Noise	• Keep concrete mixing separate from any drainages leading to waterways. • Plan activities in consultation with people living in the immediate vicinity so that noisiest activities are undertaken during periods that will result in least disturbance. • Use noise-control methods such as fences, barriers, etc. • Maintain a buffer zone (such as open spaces, rows of trees or vegetated areas) between the project site and residential areas to lessen the impact of noise to the living quarters.
Soil Erosion	• Avoid doing construction work at night-time. • Disturb as little ground area as possible, stabilize that area as quickly as possible, control drainage through the area, and trap sediment onsite. • Erect erosion control barriers around perimeter of cuts, disposal pits, and roadways. • Schedule construction activities during dry season as much as possible.
Construction Waste	• Segregate construction waste as recyclable, hazardous and non-hazardous waste. • Collect, store and transport construction waste to appropriately



Hazardous Waste	designated/ controlled dump sites. • Enforce daily site clean-up and housekeeping procedures, including maintenance of adequate disposal facilities for construction debris. • On-site storage of waste prior to final disposal should be at least 50 meters from rivers, streams, lakes and wetlands. • After each construction site is decommissioned, all debris and waste shall be cleared and recycled or disposed of in an approved location. • Prior to initiation of renovation activities, a hazardous waste management plan/ asbestos management plan should be conducted to assess the presence of asbestos, mold, lead, mercury, and other potential contaminants that will need to be removed or isolated. • Collect and properly dispose of small amount of maintenance materials such as oily rags, oil filters, used oil, etc. • Never dispose of spent oils on the ground and in water courses as it can contaminate soil and groundwater (including drinking water aquifer).
Storage of Fuels and Chemicals	• Store fuels, oils and chemicals safely in areas on an impermeable surface with berms to contain 110% of the maximum volume of the storage tank. • Train workers on correct transfer and handling of fuels and other substances and require the use of gloves, boots, aprons, eyewear, hearing protection, and other protective equipment for protection in handling highly hazardous materials. • Have adequate spill kits readily available and clearly labelled on the work site and train workers in their use, application and spill clean-up procedures.
Occupational Health and Safety	• Contractors shall conduct site specific OHS risk assessments based on OHS management plans in line with the local legal requirements and WBG EHS guidelines. • Set up the construction site with sufficient supplies of clean drinking water, power, and sanitation facilities. • Mandate the use of personal protective equipment for workers as necessary (gloves, dust masks, hard hats, boots, goggles, eye, and hearing protection). • Follow the below measures for construction involving work at height (e.g. 2 meters above ground). • Do as much work as possible from the ground. • Only allow people with sufficient skills, knowledge, and experience to perform the construction activity. • Ensure that proper training and equipment for working at heights is provided. • Checking that the place where work at height is to be undertaken is safe. • Where possible provide fall-protection measures e.g., safety harness, simple scaffolding/guard rail for works over 4 meters from ground. • Take precautions when working near fragile surfaces. • Clean up oil, grease, paint, and dirt immediately to prevent slipping and possible injury. • Keep the site clean and free of debris daily. • Provide an on-site first aid kit with bandages, alcohol or non-alcohol antiseptic wipes, dressings, etc. at the construction site. • Keep corrosive fluids and other toxic materials in properly sealed



containers for collection and disposal in properly secured areas.

- Ensure structural openings are covered/protected adequately. Secure loose or light material that is stored on roofs or open floors. During heavy rains or emergencies of any kind, suspend all work.
- Apply good electricity practices such as the use of safe extension cords, voltage regulators and circuit breakers, labels on electrical wiring for safety measures, awareness on identifying burning smell from wires, etc. at construction sites and provision of voltage detectors, multi-meters and receptacle testers as necessary.
- Ensure adequate toilet facilities for workers, at least one toilet compartment for every 25 workers, with separate facilities for males and females.
- Make sure workers are aware of GM and can access it.
- As needed, necessary PPE equipment to prevent COVID transmission, hand sanitizer, physical distancing, etc. as per current government directives.

Incident Reporting

The borrower is responsible for incident investigation

- Investigation should start as soon as possible as information, evidence and data are fresh
- The borrower/ FDA/PIU should quickly agree who is best placed to investigate, as well as the scope of the investigation (lead investigator should be competent)
- The Task Team should provide advice, but Borrower/ FDA/PIU is ultimately responsible for conducting the investigation
- Local regulatory framework may require a regulatory authority to conduct an incident (e.g. police investigation, OSHA/Labor department)
- Regulatory investigation focuses on legal compliance (i.e. who is at fault) and may not include root causes (adequacy or lack of safeguards) in projects
- Borrower/ FDA/PIU needs to conduct internal investigation/review of their safeguards and risk management
- Corrective actions with clearly defined timelines and people responsible for implementation.
- Recommendations for further improvement.
- Rope off construction area and secure materials stockpiles/ storage areas from the public and display warning signs including at unsafe locations.

Community Health and Safety

- Do not allow children to play in and around construction areas.
- If school children are in the vicinity, include traffic safety personnel to direct traffic during school hours, if needed.
- Control the driving speed of vehicles particularly when passing through community or nearby school, health center or other sensitive areas.
- Fill in all earth borrow-pits once construction is completed to avoid standing water, water-borne diseases and possible drowning.
- Avoid occurring labor influx around construction sites.
- Avoid working at night.
- Recommend hiring construction workers from nearby communities.
- Inform communities on the sexual exploitation and abuse (SEA), sexual harassment (SH), gender-based violence (GBV), and violence against children (VAC) policies.
- Make sure that the community is aware of GM and can access it.



Labor and hiring

- Implementation of COVID-19 prevention measures following government directives.
- Wherever possible hire workers from the local community and encourage hiring of women, the poor, people with disabilities, and/or other vulnerable persons.
- Ensure equal pay for the same job for both men and women.
- Ensure the minimum working age of 18 years.
- No child (under 18 years) or forced labor to be hired for the project.
- Train local workers within a reasonable time frame to meet project requirements. Costs for training will be borne by contractors.
- Avoid and when avoidance is not possible, minimize and manage labor influx.
- Prepare the Code of Conduct (CoC), inform and train workers in the CoC and ensure it is signed by all workers (See Appendix 19 Sample CoC for Contractor staff).
- Implement sexual exploitation and abuse (SEA), sexual harassment (SH), gender-based violence (GBV), and violence against children (VAC) training.

Workforce and Camps

- Provide adequate lavatory facilities for men and women at the worksite (toilets and washing areas) for the expected number of workers. Toilet facilities should also be provided with adequate supplies of hot and cold running water, soap, and hand drying devices.
- Where needed, install, and maintain a temporary septic tank system for the collection of sanitary waste without causing pollution of nearby watercourses.
- Establish a method and system for storing and disposing of all solid waste generated at the work site.
- Do not allow the use of wood fuel for cooking or heating in any cooking or kitchen facilities and provide alternate fuels.
- Ensure that site offices, depots, asphalt plants and workshops are located in appropriate areas as approved by the Project Engineer and not within 500 meters of existing residential settlements.
- Ensure that site offices, depots and particularly storage areas for diesel fuel and bitumen and asphalt plants are not located within 500 meters of watercourses, and are operated so that no pollutants enter watercourses, either overland or through groundwater seepage, especially during periods of rain. Require lubricants to be recycled and a ditch to be constructed around the refueling area with an approved settling pond/oil trap at the outlet.
- As needed, necessary PPE equipment to prevent COVID transmission, hand sanitizer, physical distancing, etc. as per current government directives.

Cultural Heritage

- Responsible local authorities and the National Culture Administration will oversee protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologists Ministry of Tourism and Cultural Affairs (MTCA), Monuments and Relics Commission. The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values.



- Decisions on how to handle the findings shall be taken by the responsible authorities and Ministry of Tourism and Cultural Affairs (MTCA), Monuments and Relics Commission. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration and salvage.
 - Implementation for the authority decision concerning the management of the finding shall be communicated in writing by relevant local authorities; and
 - Construction work could resume only after permission is given from the local authorities responsible or Ministry of Tourism and Cultural Affairs (MTCA), Monuments and Relics Commission concerning safeguarding of the heritage.
- Prohibitions**
- The following activities are prohibited on the construction site:
 - Cutting of trees for any reason outside the approved construction area.
 - Hunting, fishing, wildlife capture, or plant collection.
 - Use of unapproved toxic materials, including lead-based paints, asbestos, etc.
 - Disturbance to anything with architectural or historical value.
 - Building of fires.
 - Use of firearms (except authorized security guards, if any).
 - Use of alcohol or drugs by workers.
- Post-Construction**
- Site Decommissioning**
- The contractor will clean the site carefully and remove all construction waste materials and dump it at a designated dumping site.
 - Open burning of waste should not be encouraged.

Part 2 – Contractor’s Workers Environmental Code of Conducts

Do:	Do Not
• Use The Toilet Facilities Provided – Report Dirty or Full Facilities • Clear Your Work Areas of Litter and Building Rubbish at The End Of • Each Day – Use the Waste Bins Provided and Ensure That Litter Will Not Blow Away. • Report All Fuel or Oil Spills Immediately & Stop the Spill from Continuing. • Smoke In Designated Areas Only and Dispose of Cigarettes And • Matches Carefully. (Littering Is an Offence.) • Confine Work and Storage of Equipment to Within the Immediate Work Area. • Use All Safety Equipment and Comply with All Safety Procedures. • Prevent Contamination or Pollution of Streams and Water Channels. • Ensure A Working Fire Extinguisher • Is Immediately at Hand If Any “Hot • Work” Is Undertaken E.G. Welding, Grinding,	• Remove Or Damage Vegetation Without Direct Instruction. • Make Any Fires. • Poach, Injure, Trap, Feed or Harm Any Animals – This • Includes Birds, Frogs, Snakes, Etc. • Enter Any Fenced Off or Marked Area. • Drive Recklessly or Above Speed Limit • Allow Waste, Litter, Oils or Foreign Materials into The Stream • Litter Or Leave Food Lying Around. • Cut Trees for Any Reason Outside the Approved Construction Area • Buy Any Wild Animals for Food. • Use Unapproved Toxic Materials, Including Lead-Based Paints, Asbestos, Etc. • Disturb Anything with Architectural or Historical Value • Use Of Firearms (Except Authorized Security Guards)



- Gas Cutting Etc.
- Report Any Injury of Workers or Animals.
 - Drive On Designated Routes Only.
 - Prevent Excessive Dust and Noise
 - Use Of Alcohol by Workers During Work Hours
 - Wash Cars or Machinery in Streams or Creek
 - Do Any Maintenance (Change of Oils and Filters) Of Cars and Equipment Outside Authorized Areas
 - Dispose of Trash in Unauthorized Places
 - Have Caged Wild Animals (Especially Birds) In Camps
 - Work Without Safety Equipment (Including Boots and Helmets)
 - Creating Nuisances and Disturbances in Or Near Communities
 - Use Rivers and Streams for Washing Clothes
 - Dispose Indiscriminately of Rubbish or Construction Wastes or Rubble
 - Spill Potential Pollutants, Such as Petroleum Products
 - Collect Firewood
 - Explosive And Chemical Fishing
 - Use Latrines Outside the Designated Facilities; And
 - Burn Wastes And/Or Cleared Vegetation.



Appendix 5. Environmental and Social Management Plan (ESMP) Template

To be prepared during implementation as needed; define detailed mitigation, monitoring, and management measures for identifying impacts from specific subprojects.

Environmental and social risks and impacts are strongly linked to subproject location and scope of activities. This ESMP should be customized for each specific subproject location and activities.

1. Subproject Information

Subproject Title:	
Estimated Cost:	
Start/Completion Date:	

2. Site/Location Description

This section concisely describes the proposed location and its geographic, ecological, social and temporal context including any offsite investments that may be required (e.g., access roads, water supply, etc.). Please attach a map of the location to the ESMP.

3. Subproject Description and Activities

This section lists all the activities that will take place under the subproject, including any associated activities (such as building of access roads or transmission lines, or communication campaigns that accompany service provision).

4. ESMP Matrix: Risk and Impacts, Mitigation, Monitoring

This section should identify anticipated site-specific adverse environmental and social risks and impacts; describe mitigation measures to address these risks and impact; and list the monitoring measures necessary to ensure effective implementation of the mitigation measures. It may draw from the ESMF's pre-identification of potential risks/impacts and mitigation measures, as applicable, and drill down further to ensure relevance and comprehensiveness at the site-specific level. For subprojects involving construction, two sets of tables may be needed, for the construction phase and the operation phase.

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Impact Mitigation		Impact/Mitigation Monitoring		
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location and Frequency	Responsibility

5. Capacity Development and Training

Based on the implementation arrangements and responsible parties proposed above, this section outlines any capacity building, training or new staffing that may be necessary for effective implementation.

6. Implementation Schedule and Cost Estimates

This section states the implementation timeline for the mitigation measures and capacity development measures described above, as well as a cost estimate for the implementation. The cost estimate can focus on the line items that will be covered by the project implementing agency, with costs of mitigation measures to be implemented by the contractor left to the contractor to calculate.



7. Attachments

ESCOPs, site specific SEP etc.

IV. Review and Approval

Prepared By:(Signature)

Position: **Date**

Reviewed By:(Signature)

Position:**Date**

Approved By:(Signature)

Position: **Date**



Appendix 6: ESF Implementation Reporting Template

I. Executive Summary

- **Key Highlights:** Summary of the key environmental and social achievements.
- **Current civil works:**

II. Brief description of site in bullet form:

Example: Provide brief description of proposed project

- Located at this site over XYZ ha
- Works started in XYZ, expected to be completed by XYZ
- Supervision consultant
- Number of supervision field visits done by Project Implementation Unit
- FDA/PIU monitoring of contractors
- etc

III. Contractor Information:

Name:

Activity	Status	Comments
ESMP submitted before start of civil works		
ESMP reviewed and cleared		
LMP and OHS plan		
Traffic Management Plan if needed		
Monthly reports submitted by contractor		
Training conducted by contractor		

Name:

Activity	Status	Comments
ESMP submitted before start of civil works		
ESMP reviewed and cleared		
LMP and OHS plan		
Traffic Management Plan if needed		
Monthly reports submitted by contractor		
Training conducted by contractor		



IV. Status of E&S standards:

The following table should be filled out based on observations from supervision consultant report and field visit findings and observations:

	Status	Comments; follow-up
Waste Management		
Materials sourcing	Quality; type; registered etc	
Labor conditions		
Occupational Health and Safety	PPE usage; Training etc	
Incidents		
Community health and safety	Barricades; lighting; etc	
Biodiversity	Not relevant	
Land acquisition	Not relevant	
Stakeholder engagement		
GBV		
Grievances	Yes/no; log; feedback etc	
Communications on ESF		

V. Synopsis of key Observations of the Supervision Consultant

Report dated		Comments
Month, 2025	1. 2. 3.	
Month, 2025		

VI. Observations of FDA/PIU E&S Specialists:

Good practices undertaken	Challenges faced	Comments; suggestions
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ANNEX I:

Add photographs; before, during and after

ANNEX II:

Any other attachments; documents etc



Appendix 7: Environmental and Social Monitoring Framework

Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
PRE-CONSTRUCTION	E&S Screening and Permitting	Proportion of subprojects screened using the standardized E&S Screening Checklist before financing approval or works commencement	Percentage	PIU E&S document register	Quarterly	Review of completed screening checklists in PIU E&S register	PIU Environmental Specialist	Included in PIU operating budget
		Number of subprojects rejected on the basis of the E&S Exclusion List	Number	PIU E&S rejection register	Quarterly	Review of PIU E&S register and documented rejection decisions	PIU Environmental Specialist	Included in PIU operating budget
		Proportion of subprojects requiring EPA EIA License or Certificate of Approval with application submitted before works commencement	Percentage	PIU EPA permit tracking register	Quarterly	Review of EPA permit applications and correspondence	PIU Environmental Specialist; FDA EPA liaison	Included in PIU operating budget
	Baseline Studies	Socioeconomic baseline survey completed for project-affected communities — disaggregated by gender, ethnicity, and vulnerability status	Yes / No; number of households surveyed	PIU Social Specialist records	Once — at project start; repeated at mid-term and closure	Structured household survey administered in local languages	PIU Social Specialist; M&E Specialist	USD 25,000–40,000
		Biodiversity baseline assessment	Yes / No	PIU Environmental Specialist records	Once — before works commencement	Field survey by qualified biodiversity	PIU Environmental Specialist;	USD 15,000–25,000

ESMF – LMP LIFE-P (P508345)



Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		completed for High risk subproject areas — including critical habitat determination				specialist; desk review of IUCN Red List and protected area databases	qualified biodiversity specialist	per High risk area
	Cultural Heritage	Cultural heritage screening (desk review, community consultation, and walkover survey) completed for all subprojects with physical footprint before works commencement	Percentage of applicable subprojects with completed screening	PIU cultural heritage register	Before each subproject's works commencement	Review of Cultural Heritage Walkover Survey Reports; community consultation records	PIU Environmental Specialist; PIU Social Specialist	USD 3,000–8,000 per walkover survey
		Cultural Heritage Register established and populated with all identified resources across project area	Yes / No; number of resources recorded	PIU cultural heritage register	Once- at project start; updated quarterly	Document review of register entries; verification against community consultation records	PIU Environmental Specialist	Included in PIU operating budget
	Land and Tenure	Proportion of subproject areas with clear and documented land tenure status before works commencement	Percentage	PIU land tenure documentation register	Before each subproject's works commencement	Review of land deeds, allocation letters, community resolutions, and Land Authority records	PIU Social Specialist	Included in PIU operating budget
		Proportion of applicable subprojects with documented FPIC from affected communities before works	Percentage	PIU FPIC documentation register	Before each subproject's works commencement	Review of FPIC meeting records, signed consent documentation, and community resolutions	PIU Social Specialist	USD 2,000–5,000 per FPIC process

ESMF – LMP LiFE-P (P508345)



Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		commencement						
	Stakeholder Engagement	Number of stakeholder consultations conducted during project preparation and instrument preparation disaggregated by gender	Number; percentage female participants	PIU SEP records; consultation attendance registers	Quarterly during preparation	Review of consultation records including attendance lists, minutes, and response tracking	PIU Social Specialist; PIU Gender Specialist	USD 1,000–3,000 per consultation event
		GM operational at national and county levels including community grievance focal points in place before project activities commence in each CFMA	Yes / No; number of focal points trained	PIU GM register	Before activities commence in each CFMA	Verification of focal point training records; GM disclosure confirmation	PIU Social Specialist	USD 500–1,000 per focal point training session
	Labor	Proportion of contractors with LMP provisions — including Code of Conduct — included in contracts before signing	Percentage	PIU procurement records; contract files	At contract signing	Review of signed contracts; verification of LMP clauses and Code of Conduct annexes	PIU Social Specialist; PIU Procurement Specialist	Included in PIU operating budget
CONSTRUCTION	Environmental Compliance	Number of active subprojects with required EPA EIA License or Certificate of Approval in place	Number	PIU EPA permit register	Quarterly	Document review; verification of permit conditions compliance during field visits	PIU Environmental Specialist	Included in PIU operating budget
		Proportion of civil	Percentage	PIU contractor	Quarterly	Review of C-	PIU	Included

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Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		works sites with cleared and actively implemented C-ESMP		monitoring register		ESMP implementation during field monitoring visits; site inspection checklist	Environmental Specialist	in field monitoring budget
		Proportion of civil works sites with adequate erosion and sediment control measures in place	Percentage	PIU field monitoring checklists	Monthly (High risk sites); Quarterly (Moderate/Substantial)	Site inspection during field monitoring visits; photographic documentation	PIU Environmental Specialist; FDA Regional Foresters	USD 500–1,000 per field visit
		Number of environmental contamination incidents (fuel spills, chemical releases, water pollution) reported	Number by type	PIU incident register; contractor ESHS reports	Monthly	Review of contractor monthly ESHS reports; site inspections; water quality spot tests where indicated	PIU Environmental Specialist	USD 2,000–5,000 per water quality test event
		Proportion of construction waste streams properly segregated, stored, and disposed of in accordance with the Waste Management Plan	Percentage	PIU field monitoring checklists; contractor waste records	Quarterly	Site inspection of waste storage areas; review of waste disposal records and contractor manifests	PIU Environmental Specialist	Included in field monitoring budget
	Biodiversity and Habitat	Proportion of construction sites adjacent to PAs and CFMAs with active buffer zone and exclusion zone demarcation in place	Percentage	PIU field monitoring checklists	Quarterly	Field inspection and GPS verification of demarcated exclusion zones; photographic documentation	PIU Environmental Specialist; FDA Regional Foresters	Included in field monitoring budget
		Area (ha) of vegetation cleared	Hectares	PIU GIS monitoring; field	Quarterly	Comparison of approved	PIU Environmental	USD 2,000–

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Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		beyond approved construction footprint (encroachment incidents)		monitoring checklists		construction footprint maps with satellite imagery and GPS field measurements	Specialist; FDA GIS Unit	4,000 per GIS analysis cycle
	Cultural Heritage	Number of chance finds identified, reported to PIU within 24 hours, and managed in accordance with the Chance Find Procedure	Number; proportion reported within 24 hours	PIU chance find register	Ongoing; monthly reporting	Review of contractor ESHS incident reports; PIU chance find register; MICAT notification records	PIU Environmental Specialist	Included in PIU operating budget
		Proportion of identified cultural heritage sites with demarcated exclusion zones maintained throughout construction works	Percentage	PIU field monitoring checklists; cultural heritage register	Quarterly	Field verification of exclusion zone demarcation; GPS mapping; photographic documentation	PIU Environmental Specialist; PIU Social Specialist	Included in field monitoring budget
	Forestry Operations	Number of wildfire incidents within or adjacent to project plantation, woodlot, and restoration areas during establishment phase	Number	PIU incident register; FDA monitoring reports; community monitor reports	Quarterly	Review of FDA fire incident reports; field monitoring visits; satellite imagery analysis	PIU Environmental Specialist; FDA Regional Offices	Included in PIU and FDA operating budgets
		Proportion of land cleared for woodlot and plantation establishment limited to approved footprint no unplanned	Percentage	PIU GIS monitoring; field monitoring	Quarterly	GPS measurement of cleared area vs. approved footprint; satellite imagery comparison	PIU Environmental Specialist; FDA GIS Unit	USD 2,000–4,000 per GIS analysis cycle

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Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		clearing						
	Occupational Health and Safety	Number of OHS incidents fatalities, lost-time injuries (LTIs), medical treatment cases, and near-misses across all project sites	Number by category	PIU incident register; contractor ESHS monthly reports	Monthly	Review of contractor ESHS reports; PIU field monitoring checklists; site inspection	PIU Environmental Specialist; FDA Regional Foresters	Included in PIU operating budget
		Proportion of workers with appropriate PPE provided and in use at civil works, forestry, and processing sites	Percentage	PIU field monitoring checklists	Monthly (High risk sites); Quarterly (Moderate)	Unannounced site inspections; photographic documentation of PPE use	PIU Environmental Specialist; FDA Regional Foresters	Included in field monitoring budget
		Proportion of civil works sites with functioning first aid facilities, emergency response plans, and trained first aid personnel	Percentage	PIU field monitoring checklists; contractor ESHS records	Quarterly	Site inspection; review of first aid kit inventories; verification of first aid training records	PIU Environmental Specialist	Included in field monitoring budget
		Proportion of active civil works sites with OHS signage, site fencing, and restricted access demarcation in place	Percentage	PIU field monitoring checklists	Quarterly	Site inspection; photographic documentation	PIU Environmental Specialist; FDA Regional Foresters	Included in field monitoring budget
	Social Community	Number of community complaints or objections to construction activities received through the	Number	PIU GM database	Monthly	Review of GM database; community focal point grievance register summaries	PIU Social Specialist	Included in PIU operating budget

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Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		project GM (disaggregated by type, gender, location)						
		Proportion of construction-related grievances resolved within defined timeframes	Percentage	PIU GM database	Quarterly	Analysis of GM database resolution records; review of closure documentation	PIU Social Specialist	Included in PIU operating budget
	Social - Labor	Number of confirmed child labor incidents (workers below minimum working age of 16 years) identified across all project sites	Number	PIU labor compliance audit reports; field monitoring observations; community reports	Monthly	Unannounced site visits; age verification document checks; worker interviews	PIU Social Specialist	Included in labor audit budget
		Number of confirmed forced or compulsory labor incidents identified across project sites	Number	PIU labor compliance audit reports; GM reports; worker interviews	Monthly	Unannounced site visits; confidential worker interviews; review of contractor practices	PIU Social Specialist	Included in labor audit budget
		Number of labor-related grievances submitted through the worker grievance mechanism (disaggregated by type and gender)	Number	PIU worker GM register	Monthly	Review of worker GM register; contractor monthly ESHS reports	PIU Social Specialist	Included in PIU operating budget
	Gender and GBV/SEA	Proportion of civil works sites with active and enforced Code of Conduct —	Percentage	PIU field monitoring checklists; contractor ESHS records	Quarterly	Site inspection; review of signed Code of Conduct records; worker	PIU Gender Specialist	Included in field monitoring budget

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Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		including signed acknowledgements from all workers				interviews		
		Number of workers who received GBV/SEA awareness training before commencing work	Number; percentage of total workforce	Contractor ESHS training records; PIU training register	Quarterly	Review of training attendance registers; verification of training content and delivery language	PIU Gender Specialist	USD 1,000–2,000 per training cycle
		Number of GBV/SEA incidents reported through project channels (anonymized and disaggregated by type)	Number	PIU Gender Specialist confidential register	Monthly	Review of confidential GBV/SEA reporting register; coordination with referral service providers	PIU Gender Specialist	Included in PIU operating budget
		Proportion of GBV/SEA incidents referred to survivor support services within 24 hours of report receipt	Percentage	PIU Gender Specialist confidential register	Monthly	Review of referral documentation in confidential register	PIU Gender Specialist	Included in PIU operating budget
	Labor Influx	Proportion of civil works sites with significant labor influx with an operational Labor Influx Management Plan	Percentage	PIU contractor monitoring register	Quarterly	Document review; field visit verification of plan implementation ; community interviews on worker conduct	PIU Social Specialist	Included in field monitoring budget
	Labor Influx	Number of community-worker conflict incidents reported through	Number	PIU GM database; FDA Regional Office reports	Monthly	GM database review; community feedback during	PIU Social Specialist	Included in PIU operating budget

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Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		the GM or community channels				field visits; FDA Regional Forester reports		
OPERATION AND MAINTENANCE	Environmental -Forests and Land	Proportion of plantation, woodlot, and restoration areas using locally appropriate native species in accordance with approved species lists	Percentage	Field monitoring records; nursery procurement records	Semi-annual	Field species identification surveys; review of nursery procurement and planting records	PIU Environmental Specialist; FDA Extension Officers	Included in field monitoring budget
		Number of wildfire incidents within project plantation, woodlot, and restoration areas during operation phase	Number	PIU incident register; FDA monitoring reports; community monitor reports	Quarterly	FDA fire incident reporting; satellite imagery; community monitor reports	PIU Environmental Specialist; FDA Regional Offices; Community Monitors	Included in PIU and FDA operating budgets
	Environmental- Protected Areas	Number of encroachment incidents into Gola Forest NP and Lake Piso MUR reported and addressed	Number	FDA ranger reports; PIU incident register	Quarterly	Review of FDA ranger patrol reports; satellite imagery analysis; community reports	PIU Environmental Specialist; FDA Conservation Dept.	Included in FDA operating budget
		Proportion of ecotourism PPP investment operations (Gola NP and Lake Piso MUR) complying with site-specific ESMPs and OHS Plans	Percentage	PIU field monitoring checklists; ecotourism PPP investment operator ESHS reports	Quarterly	Field inspection of ecotourism PPP investment operations; review of operator ESHS reports; wastewater and waste management verification	PIU Environmental Specialist	USD 2,000–3,000 per field inspection visit
	Environmental	Quality of surface	Parameter	Water quality	Semi-annual	Water quality	PIU	USD

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Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
	-Water and Soil	water at monitoring points downstream of plantation, restoration, and processing sites — turbidity, pH, dissolved oxygen, and coliform indicators	values vs. baseline	monitoring reports		sampling and laboratory analysis at designated monitoring points	Environmental Specialist; accredited laboratory	5,000–8,000 per sampling and analysis round
	Environmental-Waste	Number of e-waste disposal incidents or uncontrolled disposal of IT equipment arising from FDA office IT infrastructure	Number	PIU incident register; IT asset management records	Annual	Review of IT asset disposal records; field inspection of FDA offices	PIU Environmental Specialist; FDA IT	Included in PIU operating budget
	Social - CFMAs and Communities	Number of intra-community conflicts or disputes related to benefit-sharing, resource access, or CFMB governance reported and resolved	Number	PIU GM database; FDA Regional Office reports	Quarterly	GM database review; FDA Regional Forester reports; field visits	PIU Social Specialist; FDA Regional Foresters	Included in PIU operating budget
	Social- GM	Number of grievances received through the project GM across all three tiers (disaggregated by type, gender, location, and tier)	Number	PIU GM database	Monthly	GM database review; consolidation of community, county, and national tier registers	PIU Social Specialist	Included in PIU operating budget
	Social - GM	Proportion of grievances resolved within	Percentage	PIU GM database	Quarterly	Analysis of GM database resolution dates	PIU Social Specialist	Included in PIU operating

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Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		defined timeframes				vs. receipt dates; review of closure documentation		budget
		Proportion of complainants reporting satisfaction with the grievance resolution process (disaggregated by gender)	Percentage	PIU GM satisfaction survey	Annual	Short satisfaction survey administered to all resolved complainants; gender-disaggregated analysis	PIU Social Specialist; PIU Gender Specialist	USD 2,000–3,000 per survey round
	Labor - Ongoing Operations	Number of child labor incidents identified in community-based forestry, plantation, and IGA operations during operation phase	Number	PIU labor compliance audits; community reports; GM register	Quarterly	Unannounced field visits; community interviews; review of community engagement records	PIU Social Specialist	Included in labor audit budget
	Gender	Proportion of CFMB Executive Committee positions held by women across all project-supported CFMAs	Percentage	CFMB governance records; FDA Regional Forester reports	Semi-annual	Review of CFMB election and appointment records; field verification	PIU Gender Specialist; FDA Regional Foresters	Included in PIU operating budget
		Number of GBV/SEA incidents reported through project channels during operation phase (anonymized)	Number	PIU Gender Specialist confidential register	Monthly	Confidential register review; coordination with referral service providers	PIU Gender Specialist	Included in PIU operating budget
	Institutional	Proportion of quarterly E&S Monitoring	Percentage	PIU reporting records; World Bank	Quarterly	Review of submission dates vs. due	PIU Coordinator	Included in PIU operating

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Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		Reports submitted to the World Bank on time		acknowledgements		dates (30 days after quarter end)		budget
	Institutional	Proportion of independent bi-annual E&S audit reports publicly disclosed on FDA Public Portal within 30 days of finalization	Percentage	PIU disclosure records; FDA Public Portal	Semi-annual	Verification of online posting date vs. audit finalization date	PIU Coordinator	USD 20,000–30,000 per audit (2 per year)
DECOMMISSIONING	Site Rehabilitation	Proportion of temporarily disturbed land (construction sites, labor camps, access tracks, temporary works areas) fully rehabilitated to pre-works conditions upon project closure	Percentage	PIU completion ESHS audit reports; field inspection	Once — at project closure	Field inspection and GPS measurement of rehabilitated areas; comparison with pre-works baseline documentation	PIU Environmental Specialist; independent third-party auditor	USD 10,000–20,000 per completion audit
	Site Rehabilitation	All construction and demolition waste removed from project sites and disposed of in accordance with Waste Management Plans before project closure	Yes / No	PIU completion ESHS audit; contractor close-out records	Once — at project closure	Field inspection of all construction sites; review of waste disposal manifests and contractor close-out records	PIU Environmental Specialist	Included in completion audit budget
	Site Rehabilitation	All hazardous materials — including fuels, lubricants, chemicals, and e-waste — removed	Yes / No	PIU completion ESHS audit; contractor close-out records	Once — at project closure	Field inspection; review of hazardous waste disposal certificates and contractor	PIU Environmental Specialist	Included in completion audit budget

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Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		from project sites and disposed of through approved channels before project closure				records		
	Cultural Heritage	All identified cultural heritage sites within project areas confirmed to be intact and undisturbed at project closure	Yes / No; number of sites verified	PIU cultural heritage register; closure field inspection	Once — at project closure	Field inspection of all recorded cultural heritage sites; community elder confirmation	PIU Environmental Specialist; PIU Social Specialist	Included in completion audit budget
	Labor	All outstanding labor grievances resolved and closed before project closure	Yes / No; number of open grievances	PIU worker GM register	Once — at project closure	Review of GM register; verification of closure documentation for all outstanding cases	PIU Social Specialist	Included in PIU operating budget
	GM	All outstanding project GM complaints resolved and closed — or formally transferred to government systems — before project closure	Yes / No; number of open cases	PIU GM database	Once — at project closure	GM database review; verification of closure or transfer documentation	PIU Social Specialist	Included in PIU operating budget
	Institutional	Final independent E&S completion audit conducted and report publicly disclosed	Yes / No	PIU records; FDA Public Portal	Once — at project closure	Review of audit report; confirmation of public disclosure on FDA Public Portal	PIU Coordinator; independent auditor	USD 25,000–35,000
	Institutional	Final E&S Monitoring Report	Yes / No	PIU reporting records; World	Once — at project closure	Review of submission and	PIU Coordinator	Included in PIU

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Phase	E&S Theme	Indicator	Unit	Data Source	Frequency	Method of Measurement	Responsible Party	Indicative Budget (USD)
		— covering full project lifecycle E&S performance — submitted to World Bank and publicly disclosed		Bank acknowledgement		acknowledgement records; confirmation of public disclosure		operating budget



Appendix 8: Indicative Outline of a Biodiversity Management Plan (BMP)

A Biodiversity Management Plan is required for any LiFE-P subproject or activity that may cause significant impacts on natural habitats, wildlife, or ecosystem services, consistent with ESS6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources). Where environmental and social screening identifies biodiversity risk, a BMP must be prepared before the activity commences.

Project Description and Location

- Name, location, and description of the subproject activity (e.g., CFMA demarcation, forest restoration, ecotourism PPP investment, ranger post establishment)
- Geographic coordinates; proximity to protected areas, Key Biodiversity Areas (KBAs), critical habitats, water bodies, and wildlife corridors
- Area of land affected; vegetation types to be cleared, disturbed, or managed
- Map showing subproject footprint relative to protected area boundaries (Gola Forest NP, Grebo-Krahn NP, East Nimba Nature Reserve)

Biodiversity Baseline Summary

- Habitat types present (lowland tropical rainforest, riparian, secondary forest, farmland mosaic)
- Flora and fauna species known or likely to occur, including IUCN Red List threatened species (e.g., western chimpanzee, pygmy hippopotamus, Diana monkey, Zebra duiker, Liberian Greenbul)
- Ecosystem services that project-area communities rely on (NTFPs, freshwater, fuelwood, medicinal plants, wild foods, pollination)
- Identification of critical habitat (Annex I of ESS6): habitat of Critically Endangered/Endangered species; endemic/restricted-range species; migratory/congregatory species; globally significant ecosystem types
- Data sources: field surveys, FDA biodiversity records, IUCN species assessments, existing LFSP environmental studies, stakeholder and community knowledge

Identification of Biodiversity Risks and Impacts

- Habitat loss or fragmentation from land clearing, boundary demarcation, infrastructure siting
- Disturbance to wildlife from increased human activity, noise, and machinery
- Introduction of invasive plant or animal species through restoration planting or material imports
- Disruption of wildlife movement corridors, particularly for great apes and large mammals
- Increased hunting pressure associated with labor influx or improved access
- Altered hydrology from drainage works, stream crossings,
- Chemical pollution from agrochemical use in agroforestry or NTFP value addition activities
- Impacts on community-dependent ecosystem services

Species-Specific Measures

- Great ape (chimpanzee) protocol: no clearing within confirmed nesting sites; nest surveys prior to vegetation clearing; reporting protocol for any great ape encounter
- Pygmy hippopotamus: no disturbance to riparian corridors or stream crossings used by hippos
- Invasive species management: prohibition on planting non-native species in restoration activities; protocol for identification and removal of invasives



- Bushmeat prohibition: explicit prohibition on hunting, trapping, or possession of bushmeat by project workers; included in Code of Conduct

Monitoring and Indicators

- Area of primary forest cleared (target: zero)
- Area of degraded habitat restored with native species
- Number of IUCN-listed species detected in monitoring surveys (camera trap, transect surveys)
- Number of illegal hunting/bushmeat incidents recorded and reported
- Invasive species occurrence and control actions
- Compliance rate with no-go zone restrictions

Institutional Responsibilities and Budget

- FDA Biodiversity Officer: lead implementation and reporting
- Community Wildlife Monitors: trained community members conducting regular patrol and reporting
- Independent biodiversity consultant: annual biodiversity audit
- Budget line items: survey equipment, community monitor stipends, restoration seedlings, camera traps, audit fees

Stakeholder Engagement and Disclosure

- Identification of stakeholders (local communities, conservation groups, authorities)
- Consultation process and feedback integration
- Information disclosure and grievance mechanism

Budget and Resources

- Indicative budget for BMP implementation (surveys, monitoring, restoration, training)
- Allocation of resources and funding sources

Reporting

- Quarterly biodiversity monitoring reports to PIU
- Annual BMP review submitted to World Bank



Appendix 9: Waste Management Plan

1.0 INTRODUCTION

The following Waste Management Plan (WMP) presents a framework outlining the general requirements essential for effective management of waste generated onsite during the construction works. The WMP outlines measures required to manage and mitigate the impact of waste generation and resource consumption during the construction works of the project. The plan includes details on the following:

- The types waste generated during construction activities;
- Procedures to collect and dispose of waste;
- Measures that will be implemented to minimize waste generation associated with the development; and program for monitoring the effectiveness of these measures.

This Plan also considers other aspects to waste management such as waste reduction, segregation of waste, disposal of waste.

2.0 ROLES AND RESPONSIBILITIES

The relevant roles and responsibilities to this plan are as outlined:

Project Manager

- Coordinate the implementation of this Construction Waste Management Plan.
- Coordinate site team to ensure site inspections and audits are conducted.
- Ensure environmental inspections are undertaken and records are kept.
- Coordinate the implementation of corrective and preventative action and incident response.
- Activate resources to ensure technical advice regarding environmental obligations, measures and protection is available.

Site Manager

- Ensure adequate waste management infrastructure, equipment (bins and trucks) and services are provided as required.
- Ensure that any incidents or observations that may occur during waste storage and/or handling events are properly managed.
- Implement approved waste management and minimization strategies as highlighted in this plan.
- Ensure that this plan is implemented and conduct Monthly Audit in coordination with the HSE Officer.
- Shall maintain the record of audits and training conducted.

HSE Officer

- Ensure that appointed waste transport vendor completes waste certificates prior to transporting.
- Ensure all waste bins are correctly labelled and stored in the appropriate designated area.
- Verify that all personnel, including contractors, have received the appropriate training in waste management practices and keep records of training as per Section 5 of this plan.



- Ensure Waste Inspections are being carried out on a weekly basis and Waste Inventories are being maintained.

All Personnel

- Implement the requirements of this Waste Management Plan in all aspects of the construction works.
- Ensure that the site is kept tidy, free from litter and that waste is put in the correct bins.
- Ensure that all incidents and observations relevant to waste are reported to Project Manager.

3.0 AWARENESS AND TRAINING

The Project will implement an awareness and training program that will be delivered to all construction workers. This training will include, but not be limited to:

- The application of the waste management hierarchy;
- Common waste streams produced in the construction site. ;
- Dangerous materials segregation and hazard classification codes.
- Efficient waste segregation.
- Spill Response; and
- Community impacts of poor waste management.

4.0 WASTE MANAGEMENT REQUIREMENTS

4.1 Waste Elimination and Minimization

The Project shall meet or exceed the requirements of this plan by implementing and maintaining a waste minimization strategy, as a minimum standard. The waste minimization strategy shall eliminate, minimize and manage waste during the construction activities through the following:

- Identification of waste streams and quantities;
- Implementation of management strategies for each waste stream;
- Defined roles and responsibilities;
- Training and awareness;
- Monitoring of waste streams and management activities;
- Encouraging sustainable waste management practices in the supply chain;
- Minimizing wastes from excess materials including but not limited to using surplus materials prior to re-ordering and reducing packaging waste;

4.2 Types of Waste, Classification and Handling Method

Construction site waste can be categorized as general (non-hazardous) or regulated (hazardous) waste. Regulated wastes are hazardous waste such as waste containing asbestos, oil or chemicals substances. All other waste streams are considered general waste, unless contaminated with a regulated waste.

In the event that an unknown material is discovered (e.g. liquid in a drum), it will be the responsibility of the site HSE Officer to identify the waste in coordination with the Site Manager and Store Supervisor. The person accountable in the event that the waste is not identified correctly and disposed of in the appropriate manner is the Site Manager.



Table 1 presents the waste types, classification and proposed handling methods to be implemented during the construction works.

Types of Wastes, Classification and Handling Method

Waste Type	Classification	Handling Method
Aluminum cans	General	Recycling
Batteries (cadmium and nickel/cadmium (NiCad), lead acid, lithium and other)	Regulated	Recycling
Paper	General	Recycling
Cardboard	General	Recycling
Printer cartridges	Regulated	Recycling
Plastics – bottles, drums and other containers	General (drums, depends on contaminant)	Recycle
General municipal waste	General	Treatment/Landfill
Organic waste	General	Recycle
Concrete	General	Recycle
Spent chemicals, Solvent, Paint	Regulated	Recycle
Oily waste	Regulated	Recycle
Scrap Metal (steel, aluminum, brass, copper, lead, other nonferrous metal, stainless steel and zinc)	General	Recycle
Used Filters – Oily filters	Regulated	Recycle
Septic/Effluent	Regulated	Regulated Site
Contaminated Soil	Not a waste	Treated*
High density polyethylene (HDPE) waste	General	Recycle
Rubber	Regulated	Recycle
Tires	Regulated	Recycle
Textiles and rags	General (unless contaminated with a regulated waste)	Reuse/ Recycle
Other solid regulated waste	Regulated	Regulated Landfill
Concrete –solid form left over	General	Recycled
Spent spill Clean Up	Regulated	Regulated Landfill

Note: General – Non-Hazardous Wasted, Regulated – Hazardous Waste

5.0 WASTE STORAGE REQUIREMENTS

5.1 General Waste

The following must be considered as minimum requirement for general waste storage areas:

- General waste bins and containers (e.g. food scrap bins, recyclable bins, recyclable paper bins) are to be placed in easily accessible locations around the worksite. Recyclable waste shall be stored separately from general waste; ensuring maximized segregation potential has been met to minimize waste sent to landfill.
- Liquid and solid wastes shall be segregated to allow for maximized recycling, bins will be color coded for the waste stream, where practicable.
- Where a waste material or product does not have a specific bin, the bin used must be compatible with the waste and must then be labelled.



4. Spare bins shall be made available to accommodate for unforeseeable events.
5. Waste bins shall be maintained in good condition to prevent leaks or spills. Defective containers shall not be used for waste storage or transport.
6. Containers used for waste storage (such as waste oil drums) shall not be opened, handled, transported or stored in a manner that may rupture the container, cause it to leak or subject it to overpressure.
7. The waste storage area shall be of an adequate capacity to handle the volume of waste stored there without a risk to the environment.
8. The waste storage area shall be located in an easily accessible area to provide vehicle access to materials and waste storage areas for the collection and transport of wastes.
9. Waste storage areas shall have adequate firefighting equipment suitable for the type of waste stored at site.
10. The location of the waste storage area shall also consider the proximity to neighbors and environmentally sensitive areas to minimize impacts on people and the surrounding environment (e.g. impacts due to dust, windblown rubbish, pests, odour, visual amenity, noise and light).
11. Suitably sized spill kits and spill containment systems relevant to the activities within the site shall be available in the vicinity of the waste storage areas. Maintenance of spill kits shall be kept up to date, ensuring that no equipment is missing from the kit. Spills shall not be cleaned by hosing or activities resulting in the further spread of the contaminant to land or water.
12. All waste storage bins shall have secure lids and if required, clasps.
13. All waste containers shall be appropriately identified and clearly labelled.
14. All lids and if applicable clasps shall be maintained on waste storage bins to ensure that the waste does not cause an odor nuisance.
15. Lids on general waste bins containing food scraps shall be suitable to prevent access by birds.
16. Maximum retention times for wastes that may produce odors shall not exceed 7 days.
17. Waste shall not be burned.

5.2 Regulated (Hazardous) Waste

Regulated wastes shall be stored in the designated waste storage area. The area shall be clearly marked and records of the waste streams stored at site shall be held by the Site Manager. An assessment of the regulated waste storage area shall be undertaken by the HSE Officer on a regular basis to ensure that incompatible wastes are segregated.

To assist in the collection and transfer of regulated wastes, designated regulated waste bins, drums and skips shall be used where applicable. The following measures shall be implemented:

1. There will be dedicated regulated waste storage areas, to prevent the mixing of regulated wastes with other stored material.



2. An inventory will be kept and maintained of all regulated waste stored.
3. Loading and unloading procedures shall be undertaken in a manner that ensures wastes will not spill or containers break.
4. Containers storing regulated wastes shall be securely closed where practical.
5. Waste storage areas shall be clearly signed designating what wastes are to be deposited at storage location and any specific directions/hazards.
6. All containers shall be labelled at all times for clear interpretation of the contents.
7. There will be adequate containment measures to prevent off-site migration of spills.
8. Sufficient and appropriate clean equipment (spill kit) shall be provided together with appropriate instructions and training.
9. Spills shall not be cleaned by hosing or activities resulting in the further spread of the contaminant to land or water through the drainage channel.
10. No liquid wastes, wash down waters or storm water waste contaminated with hazardous waste will be disposed of via the storm water drainage system.
11. As soon as practicable, all regulated waste shall be removed to an approved waste disposal facility or recycling facility.
12. Waste shall not be burned or allowed to burn.

6.0 WASTE LABELLING

All wastes shall be labelled in accordance with examples provided in line with the following guidelines:

- Ensure that there are no other labels on the waste container except a label that refers to the current contents of the specific storage vessel or container.
- Containers shall be labelled as soon as the waste is added.
- Labels shall not be placed on a waste storage vessel or container prior to the addition of the waste as any spills may destroy such labels.
- Labels shall be of a reasonable size and clarity so that the waste material is easily identified.
- Labels shall be placed on the side of the containers; however, in the event a label cannot be placed on the side it shall be placed on the top of the container.
- Label shall be positioned such that it can be easily read.
- Do not cover the manufacturer 's product label (should the original drum be used) with waste labels.

7.0 WASTE DISPOSAL

All waste generated on site shall be disposed of in accordance with the S.I.15 National Environmental Protection (Management of Solid and Hazardous Wastes) Regulations 1999. Waste management options shall be done in accordance with the waste hierarchy. All other disposal options shall be considered first before sending waste to landfill and all opportunities to reduce waste volumes generated shall be explored.

7.1 Surplus Materials Identification, Classification and Declaration

- **Identification**



The Site Manager in coordination with Store Supervisor, shall identify materials that are surplus on an ongoing basis during the construction works to avoid unnecessary purchase that may lead to waste generation.

- **Classification**

Surplus Materials shall be classified by the Project as:

- Obsolete:** Where a design change has rendered materials no longer required for incorporation into the construction works.
- Damaged:** Where rectification of the damaged Material is not cost effective.
- Scrap and waste materials:** Scrap are waste Materials that have no intended Project use which include but are not limited to:
 - Off cuts of pipe;
 - Off cuts of cable;
 - General recyclable waste (copper, steel, aluminium, timber, concrete);
 - Consumables; and
 - Excess tools and consumable Materials used in the construction phase.

8.0 WASTE TRANSPORT AND DISPOSAL

Waste shall be segregated accordingly until collection and off-site processing or disposal occurs. All waste volumes shall be transported by a licensed contractor and must be recorded on the Site Waste Report Register.

The following procedure shall be followed when waste collection occurs:

- The waste collector must complete a Waste Consignment note by ensuring that:
 - The register has been filled out correctly.
 - The type of waste is identified in detail.
 - The area where the waste is to be collected is identified.
 - The amount of waste to be transported is identified.
 - Site contact for the collection of the waste is noted.
 - Handling requirements of waste have been identified from the MSDS where applicable or another relevant reference.
 - A contact for the waste destination has been identified and notified, where required.
- During the loading of waste, spill kits and firefighting equipment must be made available as applicable.
- If at any time during the load out and transporting event, it is considered unsafe to proceed or there is an increased potential that a waste material may be released to the environment, the activity shall cease, the Site Manager must be informed of the event, and an assessment of the situation must be undertaken.
- All reasonable and practical measures shall be taken to ensure that wastes are adequately secured prior to the waste being transported.
- The appointed waste vendor shall ensure that vehicles and equipment used for the transfer and transportation of wastes are not overloaded or loaded in a manner which could lead to a loss of containment during transportation. This shall be stated as a contract requirement.
- The handling and management of wastes during transport shall be closely monitored to ensure there is no risk of a release to the environment.



9.0 INSPECTION CHECKLIST AND INVENTORY MANAGEMENT

Weekly visual inspections shall be performed. Evidence of inspection shall be retained and provided as may be required. The inspection checklist and inventory to be applied shall include but not be limited to:

- Labeling
- Bin condition
- House keeping
- Waste Segregation
- Availability of Spill kits
- Materials and Waste Inventory

7.BUDGET

The budget for implementing the ESMP covers activities to be taken to implement this plan.

Waste Characterization

Non-hazardous solid waste: General office waste; food waste from worker camps; packaging materials; construction debris (timber offcuts, concrete, metal, plastics); green waste from nursery operations and restoration activities.

Hazardous waste: Chemcia containers from used motor oil and lubricants from equipment maintenance; batteries; medical waste from first aid stations; treated timber off-cuts from processing facilities; paint and solvent containers from construction.

Liquid waste/wastewater: Sewage and greywater from worker camps, ranger posts, and ecotourism PPP investment facilities; runoff from nursery chemical applications; effluent from wood processing and snail farming operations.

E-waste: Used electronic equipment from project offices and monitoring systems.

Waste Management Hierarchy All waste management under LiFE-P shall follow the hierarchy: (1) Reduce-minimize waste generation at source; (2) Reuse - repurpose materials where possible; (3) Recycle-separate recyclable materials for collection; (4) Recover - recover energy from organic waste where feasible; (5) Dispose-dispose of residual waste in an environmentally sound manner.

Solid Waste Management Procedures

- Separate waste at source into organic, recyclable, and non-recyclable streams at all project sites
- Organic waste from nurseries and kitchens to be composted on-site where feasible
- Recyclable materials (plastics, metals, glass) to be stored in labeled containers for collection by licensed recycler or transport to nearest urban waste facility
- Non-recyclable general waste to be disposed at licensed municipal landfill; no open burning of waste at project sites
- Construction debris to be segregated; reusable materials (timber, metal) recovered; inert debris disposed at designated construction waste disposal area

Hazardous Waste Management Procedures

- All hazardous waste to be stored in clearly labeled, leak-proof, secondary-contained containers in a designated hazardous waste storage area (see Annex ## Chemical Storage Plan)



- Used oil and lubricants: collected in sealed drums; transported to licensed oil recycling facility
- Medical waste from first aid stations: segregated in puncture-proof sharps containers and sealed bags; transported to nearest health facility with medical waste incineration capacity
- E-waste: collected and transported to licensed e-waste recycler; no dumping

Wastewater Management

- Ranger outposts, worker camps, and ecotourism PPP investment facilities to be equipped with septic tanks or constructed wetland systems adequate for the number of users; no direct discharge of untreated sewage to surface water
- Nursery chemical runoff to be managed through bunded application areas with collection sumps; no direct runoff to streams
- Wood processing effluent (sawdust, wood chips, process water) to be collected and managed; sawdust to be composted or used as biomass fuel

Monitoring and Reporting

- Monthly waste generation records maintained by site supervisor (waste type, volume, disposal route)
- Quarterly waste audit conducted by PIU Environmental Officer
- Annual waste management performance report submitted to FDA PIU and included in project progress reports



Appendix 10: Community Health and Safety Plan (CHSP)

COMMUNITY HEALTH AND SAFETY RISK ASSESSMENT

Communicable Diseases and Public Health Risks

The six LiFE-P target counties, Gbarpolu, Grand Cape Mount, Rivercess, Grand Bassa, Grand Gedeh, and Sinoe are among Liberia's most medically underserved counties. All six counties are endemic to malaria. Other significant communicable disease risks in the project area include:

- Malaria: Hyperendemic in all seven counties; highest transmission in forested and wetland environments, including GFNP and LPMR landscapes.
- Schistosomiasis (Bilharzia): Present in freshwater bodies across the project area; elevated risk for communities and workers operating in and around LPMR's lacustrine and wetland environment.
- Lassa Fever: Endemic in the Western Cluster counties, particularly Lofa, which has historically recorded the highest incidence of Lassa fever in Liberia.
- HIV/AIDS and Sexually Transmitted Infections (STIs): Labour influx associated with construction works carries a documented risk of increased HIV/STI transmission in host communities.
- Tuberculosis (TB): Prevalent in rural Liberian communities; risk increased by labour camp crowding conditions.
- Cholera and Waterborne Diseases: Risk in communities without access to safe drinking water, particularly during construction when water sources may be disrupted.
- COVID-19 and Epidemic-Prone Diseases: Liberia remains at risk of epidemic outbreaks including Ebola; project labour camps and community gatherings represent potential transmission nodes.

Specific risks at LPMR: Schistosomiasis transmission is a particular concern for workers and communities in and around Lake Piso, given the presence of freshwater snail hosts in the shallow wetland margins. Water contact during patrol track rehabilitation, boundary works, and ecotourism development activities must be managed to reduce exposure.

Labour Influx and Associated Community Safety Risks

Construction-phase activities including patrol track and road rehabilitation, staff office and housing construction at GFNP and LPMR, SEC facility rehabilitation at FTI, and woodlot/plantation establishment may involve the recruitment of external workers into communities that currently host very small resident populations. Labour influx is consistently associated with:

- Increased incidence of GBV and sexual exploitation and abuse (SEA) in host communities, particularly affecting women and girls
- Increased HIV/STI transmission rates
- Social tensions and conflict over access to local resources (water, food, land)
- Increased demand on health, education, and water and sanitation services
- Increased child labour and out-of-school rates driven by economic pressure

In Gbarpolu, Grand Cape Mount, and Lofa counties where FGM prevalence reaches 78, 71, and 40 percent respectively, and where deeply embedded patriarchal social norms prevail, the arrival of external male workers without adequate supervision and Code of Conduct enforcement represents a heightened GBV risk.

Road Safety and Traffic Risks



Rehabilitation and maintenance of roads and patrol tracks under Sub-components 2.3 and 3.3 will increase vehicular traffic including heavy construction vehicles and timber extraction trucks on rural roads that are currently used predominantly by pedestrians and motorcycles. Pedestrian safety risks are elevated in communities where roads pass through or adjacent to residential areas, schools, markets, and health clinics. Children and elderly persons face the greatest vulnerability to road traffic injuries.

Fire Risks

Community woodlot establishment and plantation rehabilitation under Sub-component 2.2 involve firebreak construction and controlled burning. Escaped fires during the dry season (November–April) in the savanna-forest transition zones of Grand Gedeh and Grand Bassa represent a risk to community structures, crops, and forest cover. In communities adjacent to GFNP, escaped fires could penetrate the park boundary and cause irreversible habitat damage.

Security and Use-of-Force Risks

FDA ranger patrols at GFNP and LPMR under Sub-component 2.3 carry risks of ranger-community confrontation, disproportionate use of force against encroachers or illegal miners, intimidation of community members, and GBV by uniformed personnel.

Water, Sanitation, and Hygiene (WASH) Risks

Construction activities including worker camps, ranger camps, and CFMB offices will generate wastewater and solid waste that, if not managed, will contaminate local water sources. Communities in all six project counties already face significant WASH challenges:

COMMUNITY HEALTH AND SAFETY MITIGATION MEASURES

Communicable Disease Prevention and Management

Malaria Prevention

- All project workers deployed to field sites in the six target counties will be issued insecticide-treated bed nets (ITNs) and will receive malaria prophylaxis where medically appropriate.
- Contractor camps will be sited away from stagnant water bodies; standing water will be drained or treated regularly to eliminate mosquito breeding sites.
- Rapid diagnostic tests (RDTs) and artemisinin-based combination therapy (ACT) will be maintained at all project field offices and worker camps.
- Community sensitization on malaria prevention using community health workers, community radio, and FDA extension staff will be conducted at project launch in each of the six counties.

Schistosomiasis Prevention (specific to LPMR)

- Workers involved in patrol track rehabilitation, boundary works, and any water-adjacent activities at LPMR will be provided with rubber boots and gloves to minimize freshwater contact.
- Pre-deployment and annual medical screening for schistosomiasis will be mandatory for all workers deployed to LPMR.
- Community awareness sessions on schistosomiasis prevention will be coordinated with the Ministry of Health county health teams in Grand Cape Mount County.

Lassa Fever



- Pre-deployment health briefings for all project staff and workers deployed to Lofa will include specific guidance on Lassa fever prevention, including rat-proofing of food storage and avoidance of contact with rodents.
- The PIU will establish a Lassa fever emergency referral protocol linking project field and to the nearest Lassa fever treatment unit.

HIV/AIDS and STI Prevention

- A comprehensive HIV/AIDS and STI awareness and prevention program will be implemented at all construction sites and labour camps, including: distribution of condoms; peer education sessions; voluntary confidential counselling and testing (VCCT); and referral to treatment services.
- The program will extend to host communities, not only workers, and will be delivered in partnership with county-level HIV/AIDS coordinators and NGOs with existing programs in the six counties.

General Infectious Disease Preparedness

- The PIU will prepare a Communicable Disease Management Plan (CDMP) as a sub-plan of this CHSP before construction activities commence, setting out protocols for disease surveillance, outbreak response, and coordination with the Ministry of Health.
- The CDMP will include an epidemic-readiness protocol specifically addressing Ebola and COVID-19 resurgence risks, consistent with Liberia's national emergency preparedness frameworks.

Labour Influx Management

- A Labour Influx Management Plan will be prepared by the contractor(s) before any construction contracts are awarded. The LIMP will establish: worker camp siting criteria (minimum 500m from residential areas and schools); restrictions on worker movement outside designated areas; community liaison protocols; and local hiring quotas requiring contractors to fill at least 60 percent of unskilled positions from the immediate host community.
- All workers including security personnel and rangers will sign a Code of Conduct before commencing work, covering: prohibition of SEA and GBV; prohibition of child labour; prohibition of unauthorized entry into protected areas; prohibition of bushmeat consumption or purchase; alcohol and drug policy; and community interaction norms.
- The project will engage a dedicated GBV service provider with presence in each of the six target counties to: deliver GBV prevention training to workers and communities; operate a safe, confidential GBV reporting channel accessible to both workers and community members; and provide survivor-centred response services including referral to medical care, psychosocial support, and legal aid.
- The PIU GBV Specialist will conduct quarterly monitoring visits to all active construction sites to assess Code of Conduct compliance and community satisfaction with contractor conduct.

Road Safety

- A Traffic Management Plan will be prepared for all road and patrol track rehabilitation works under Sub-components 2.3 and 3.3, including: speed limits for all project vehicles (maximum 30 km/h in communities; 50 km/h on open roads); flagman systems at active construction zones; installation of speed bumps, warning signs, and pedestrian crossing markings near schools, health clinics, and markets; and prohibition of transporting workers in truck beds.
- All construction vehicles and heavy equipment will undergo pre-deployment roadworthiness inspections and will display clearly visible project identification markings.



- Community road safety awareness sessions will be conducted by FDA community liaison officers in all communities affected by road rehabilitation works before construction begins.
- A road traffic incident reporting system will be established, with all incidents including near-misses reported to the PIU within 24 hours and investigated within 72 hours.

Fire Management

- A Fire Management Plan (FMP) will be prepared for all forest restoration, woodlot establishment, and plantation rehabilitation activities under Sub-component 2.2, addressing: prescribed burning protocols; firebreak dimensions and maintenance schedules; prohibition of open burning during high-risk periods (November–February); community fire-reporting mechanisms; and emergency response procedures.
- The FMP will be coordinated with FDA field stations, county fire authorities, and community forest monitoring teams trained under Sub-component 2.2(d).
- Firebreak construction in GFNP buffer zone communities (Grand Cape Mount, Gbarpolu) will be reviewed by the GFNP Park Warden before implementation to ensure alignment with park fire management protocols.

Security Management and Ranger Conduct

- A Security Management Plan (SMP)- a standalone instrument, has been prepared prior to project appraisal for all armed ranger patrol operations at GFNP and LPMR, consistent with World Bank ESS4 requirements and the UN Basic Principles on the Use of Force and Firearms.
- The SMP will include: a use-of-force protocol establishing the minimum force necessary principle; de-escalation training for all rangers before deployment; a ranger Code of Conduct prohibiting GBV, harassment, intimidation, and unauthorized extortion of community members; and a community complaint mechanism specifically for ranger-related concerns.
- Rangers will be equipped with non-lethal deterrent options in addition to firearms, and will undergo mandatory GBV prevention training delivered by the project GBV service provider.
- A Security Incident Register will be maintained at each PA, with quarterly reports submitted to the PIU and disclosed to the World Bank.
- Community satisfaction surveys will be conducted semi-annually in communities adjacent to GFNP and LPMR to monitor ranger-community relations and identify emerging grievances.

Water, Sanitation, and Hygiene (WASH)

- All project worker camps and site offices will be equipped with adequate safe drinking water, sanitation facilities (gender-separated latrines for men and 1:10 for women), and handwashing stations with soap.
- Wastewater from worker camps will be disposed of through constructed soakaway systems or portable sanitation units; discharge of untreated wastewater to natural water bodies is strictly prohibited.
- Solid waste from construction sites and worker camps will be managed through a site waste management plan including waste segregation, composting of organic waste, and controlled disposal of non-organic waste at designated county dump sites.
- Any project activity that disrupts an existing community water source including road and patrol track rehabilitation works that cross watercourses will be required to provide an alternative temporary water supply to affected communities throughout the disruption period.

SPECIAL PROVISIONS FOR GFNP AND LPMR COMMUNITIES



Gola Forest National Park (GFNP) Buffer Zone Communities

Communities in the buffer zones of GFNP in Grand Cape Mount and Gbarpolu Counties face specific health and safety risks associated with: ranger enforcement activities (use-of-force risk); boundary demarcation (restricted access to customary resources); RIL operations in surrounding CFMAs (chainsaw and logging traffic risks); and forest restoration works (fire and chemical risks). The following additional measures apply specifically to GFNP buffer zone communities:

- Dedicated community health and safety orientation sessions will be conducted in all communities within 10 km of the GFNP boundary before any physical works commence, delivered in local languages through community radio and community meetings.
- A PA-Community Interface Protocol will be established in consultation with GFNP buffer zone communities, defining: agreed access arrangements for community members collecting NTFPs or conducting traditional activities near the park boundary; procedures for reporting ranger misconduct; and a schedule of regular FDA–community dialogue meetings (minimum quarterly).
- A first-aid response post will be established at the GFNP HQ, accessible to community members, stocked with basic medical supplies and equipped with a vehicle-accessible radio communication system.

Lake Piso Multiple Use Reserve (LPMR) Communities

Communities adjacent to LPMR face heightened health risks associated with the wetland environment, including schistosomiasis, waterborne diseases, and drowning risk. Additionally, the Multiple Use character of LPMR where sustainable resource extraction is permitted creates potential for community-ranger conflict if enforcement actions are perceived to be inconsistent with the reserve's co-management mandate. Additional measures specific to LPMR communities include:

- A schistosomiasis awareness and prevention campaign will be conducted in all Lake Piso-adjacent communities in Grand Cape Mount County at project launch, in partnership with the county health authority.
- Life-saving equipment including life rings and throw lines will be installed at any waterfront construction or patrol activity site within LPMR.
- A Community Co-Management Committee will be established for LPMR before any enforcement activities are strengthened, ensuring that fishing community representatives, women's groups, and traditional leaders are formally included in reserve governance and that the community health and safety provisions of this CHSP are reviewed and endorsed by the Committee.

GRIEVANCE MECHANISM (GM)

A project-level Grievance Mechanism (GM) will be established before the commencement of any project activities, accessible to all community members in the six target counties and specifically designed to address community health and safety concerns. Key features:

- Multi-channel access: Communities may submit grievances in writing (community complaint boxes at FDA field offices and CFMB offices), by phone (dedicated toll-free GM hotline), verbally (to community liaison officers), or through a trusted community intermediary (CBO, traditional leader, women's group leader).
- Language accessibility: GM channels will be available in English and all relevant local languages across the six counties
- GBV-specific channel: A separate, confidential GBV complaint channel will be maintained, managed exclusively by the project GBV Specialist, with direct referral to GBV service providers and survivor-centred response protocols. Community health and safety grievances



will be acknowledged within 5 working days, investigated within 15 working days, and resolved within 30 working days.

- GM monitoring: GM case data disaggregated by gender, age group, county, sub-component, and type of grievance will be reported quarterly in project progress reports and disclosed publicly.



Appendix 11: Outline on Cultural Heritage Assessment and Management

Purpose and Scope

This Annex provides operational guidance on the identification, assessment, protection, and management of cultural heritage under LiFE-P, in accordance with World Bank Environmental and Social Standard 8 (ESS8) on Cultural Heritage and applicable Liberian national law. It applies to all project activities with a physical footprint including civil works, land-based restoration and plantation activities, reduced-impact logging operations, ecotourism PPP investment, and community infrastructure development across all four geographic clusters of the project in Gbarpolu, Grand Cape Mount, Rivercess, Grand Bassa, Grand Gedeh, and Sinoe Counties.

ESS8 recognizes that cultural heritage provides continuity in tangible and intangible forms between the past, present, and future. It requires that the project protect cultural heritage from adverse impacts throughout the project lifecycle, address cultural heritage as an integral dimension of sustainable development, promote meaningful consultation with relevant stakeholders, and ensure that communities receive equitable benefits from the use of their cultural heritage. Critically, ESS8 applies to cultural heritage regardless of whether it has been legally protected or previously identified or disturbed a provision of particular significance in Liberia, where systematic documentation of cultural heritage across rural forest communities remains very limited.

National Legal and Institutional Framework for Cultural Heritage in Liberia

Liberia's legal framework for cultural heritage protection is distributed across several instruments rather than codified in a single comprehensive law, reflecting a recognized policy gap that the Government has committed to addressing. Understanding this framework is essential for LiFE-P's PIU and implementing partners to ensure compliance with both national requirements and World Bank ESS8. The Environmental Protection and Management Law (EPML, 2003) and the EPA Act (2003) together constitute the primary environmental legal framework within which cultural heritage considerations are embedded. The EPML requires Environmental Impact Assessments for development projects including those financed under LiFE-P address cultural heritage resources within and adjacent to project areas. The EPA, as the lead national environmental authority, has oversight responsibility for ensuring that EIA processes adequately screen for and address cultural heritage risks. This requirement applies to all LiFE-P subprojects requiring an EPA EIA permit or Certificate of Approval, and the PIU shall ensure that cultural heritage assessment is integrated into all EIA submissions to the EPA. The Land Rights Law (2018) is of direct and significant relevance to LiFE-P. It explicitly mandates that cultural shrines and heritage sites receive the same legal protection as formally designated protected areas, and further requires that any land-based investment obtain the Free, Prior, and Informed Consent (FPIC) of affected communities. Given that many of LiFE-P's land-based activities including CFMA establishment, plantation rehabilitation, forest restoration, and woodlot creation operate on community land or in areas with long histories of community use, the Land Rights Law establishes a strong legal basis for ensuring that cultural heritage considerations are central to the project's community engagement and land access processes. The 1957 Supplementary Act for the Conservation of the Forests is a long-standing provision of direct operational relevance to LiFE-P's forestry activities. It explicitly prohibits the felling of trees deemed sacred or medicinal by local populations, or those within one hundred yards of a village or market, without the consent of the tribal authority and a Forest Officer. This provision must be incorporated into the operational guidelines for all LiFE-P land-clearing, chainsaw milling, and silvicultural activities, and all contractors and community workers engaged in forestry operations must be trained on its requirements. The National Forestry Reform Law (NFRL, 2006) and the Community Rights Law (CRL, 2009) further reinforce community rights over forest resources and require community consent for commercial timber operations on community forest land. These provisions interact directly with cultural heritage



protection by establishing community authority over the forests and forest resources including culturally significant trees, sacred groves, and traditional use areas within CFMA boundaries.

The Ministry of Information, Cultural Affairs and Tourism (MICAT) is the lead government ministry with responsibility for cultural heritage policy in Liberia. The Liberia National Museum, operating under MICAT, is the principal state institution responsible for the preservation of archaeological and historical heritage, and is the competent authority to which chance finds must be reported under Liberian law. Liberia accepted the UNESCO World Heritage Convention in 2002 and has three sites on the tentative World Heritage List, including Providence Island a historically significant site where early Americo-Liberian settlers arrived. At the subnational level, County Superintendents and District Commissioners have roles in managing local cultural affairs and resolving disputes over heritage sites, and should be engaged in cultural heritage consultations for subprojects with significant cultural heritage risks.

Cultural Heritage Screening and Assessment Procedures

Given the prevalence and sensitivity of cultural heritage resources in LiFE-P's project areas and the limited existing documentation of these resources a proactive, participatory, and culturally appropriate screening and assessment process is required before any physical works or significant land disturbance activities commence. The following sequential procedures shall apply to all project activities with a physical footprint, and shall be integrated into the subproject appraisal process for all activities under the matching grant scheme (Sub-component 2.1), the plantation and restoration program (Sub-component 2.2), the protected area management investments (Sub-component 2.3), and the civil works under Sub-components 3.2 and 3.3.

The first procedural step is a desk-based cultural heritage review, conducted by the PIU Environmental Specialist and Social Specialist before any site visits are undertaken. The desk review shall systematically compile all available information on known cultural heritage resources within and adjacent to the proposed activity area, drawing on records and documentation from the Liberia National Museum, MICAT, the Land Authority, the FDA's existing CFMA documentation and forest management records, previous ESIA reports for other projects in the relevant counties, satellite imagery interpreted for landscape features of potential heritage significance, and published academic and grey literature on the cultural history and ethnic geography of the project counties. The desk review shall produce a preliminary cultural heritage sensitivity map for the proposed activity area, identifying areas of known or probable high sensitivity that require particular attention during subsequent field assessment.

The second procedural step is a community-based cultural heritage identification process, which is the most important and informative element of the pre-works assessment for LiFE-P's context. This process shall be conducted by the PIU Social Specialist and Gender Specialist, working closely with community facilitation partners who have established trust relationships in the relevant communities. For each proposed activity site, dedicated consultations shall be held with a range of community representatives including community elders and clan chiefs, traditional healers, women's group leaders, CFMB members, Poro and Sande society leaders where culturally appropriate and feasible, and other community members with knowledge of local heritage. These consultations shall be conducted in the relevant local language Lorma, Kpelle, Loma, Gbandi, Belle, Bassa, Kru, Grebo, Krahn, or Mano as appropriate using trained facilitators familiar with local cultural protocols. Participatory mapping exercises, community walks, and storytelling sessions shall be used to elicit information on sacred forests, burial grounds, culturally significant trees, historical sites, and other heritage resources within and near the proposed activity area in a culturally safe and respectful manner.



The PIU Gender Specialist shall ensure that women's cultural heritage knowledge is explicitly captured through gender-separated consultation sessions where culturally appropriate, given that certain categories of cultural heritage particularly those associated with the Sande society are the domain of women and will not be disclosed in mixed-gender consultation settings. Similarly, information about Poro society forests and rituals may only be forthcoming through appropriate gender-separated engagement with male society leaders. Community members shall be informed at the outset of these consultations that information they wish to keep confidential particularly regarding secret society areas will be treated as such and will not be recorded in public project documents. Instead, such information will be used solely to inform the exclusion zone demarcation and site planning process, ensuring that sensitive areas are avoided without their locations being publicly disclosed.

The third procedural step is a cultural heritage survey conducted by a qualified cultural heritage specialist before the commencement of civil works and major land disturbance activities. The walkover survey shall involve a systematic on-foot inspection of the proposed activity area and its immediate surroundings, covering the full extent of the planned disturbance footprint plus a buffer zone of at least fifty meters. The survey shall document surface indications of cultural heritage resources including artifacts, structural remains, disturbed soils suggesting former habitation, unusual vegetation patterns associated with former land use or sacred groves, cemetery markers, and community-placed indicators of sacred or restricted areas. The walkover survey shall be conducted in the presence of a knowledgeable community representative who can provide contextual information on features encountered. The results of the walkover survey shall be documented in a Cultural Heritage Walkover Survey Report submitted to the PIU, and for activities requiring an EPA EIA permit incorporated into the ESIA or ESMP submitted to the EPA.

Where the desk review, community consultation, or walkover survey identifies significant cultural heritage resources within or adjacent to a proposed activity area, the PIU shall apply a mitigation hierarchy in determining the appropriate response. The first and strongly preferred option is avoidance redesigning the activity layout, shifting the activity footprint, or selecting an alternative site to avoid any physical contact with the heritage resource, and establishing a clearly demarcated exclusion zone of appropriate dimensions around the resource. Where avoidance is not technically or economically feasible without fundamentally undermining the project objective, the PIU shall engage a qualified cultural heritage specialist to prepare a Cultural Heritage Management Plan in consultation with the affected community, MICAT, and the Liberia National Museum. The Cultural Heritage Management Plan shall set out the specific protection, documentation, and management measures to be implemented, including community monitoring arrangements, and shall be reviewed and cleared by the World Bank before the relevant activity proceeds. No project activity that will directly disturb, damage, or destroy a significant cultural heritage resource shall proceed without the prior written agreement of the affected community, the concurrence of MICAT and the National Museum, and the clearance of the World Bank.

For NTFP valorization and commercialization activities under Sub-components 2.1 and 3.1 that involve the use of traditional knowledge or intangible cultural heritage, the PIU Social Specialist shall ensure that a community-level FPIC process is completed with the knowledge-holding communities before commercial activities commence. The FPIC process shall document the community's understanding of how their traditional knowledge will be used, their consent to that use, and the benefit-sharing arrangements agreed including the proportion of commercial revenues or other benefits to be shared with the community. These arrangements shall be documented in the relevant subproject agreement and monitored by the PIU throughout implementation.

Chance Find Procedure (See Appendix 9)



Training and Awareness

Effective protection of cultural heritage under LiFE-P depends fundamentally on the awareness and understanding of all workers engaged in physical activities across the project area. All workers including direct workers, contracted workers, subcontractor workers, and community workers engaged in land-based activities shall receive dedicated cultural heritage awareness training as a mandatory component of their ESHS induction before commencing work on any activity with a physical footprint.

The cultural heritage induction training shall be designed by the PIU Social Specialist and ESHS Manager in consultation with community cultural knowledge holders, and shall be delivered in the local language of the work area by a trained facilitator. The training shall cover the meaning and importance of cultural heritage both tangible and intangible in the specific community and landscape context of the work site; the specific types of cultural heritage resources likely to be encountered in the project area, including sacred forests, burial grounds, archaeologically significant deposits, and culturally important trees; the community-specific sensitivities relevant to the work site, communicated by local elders or traditional leaders where culturally acceptable; the absolute prohibition on disturbing, collecting, selling, photographing for personal use, or removing any item that may constitute cultural heritage; the specific behaviors required in the vicinity of known sacred areas, burial grounds, and restricted zones; the Chance Find Procedure and the precise steps a worker must follow upon discovering a potential heritage resource during works; and the disciplinary consequences of non-compliance with cultural heritage protection requirements, including dismissal and potential legal liability under Liberian law.

Following the initial induction, cultural heritage awareness shall be reinforced through regular toolbox talks throughout the works period particularly before the commencement of new ground disturbance, excavation, or land clearance activities in previously undisturbed areas, and at the start of works in new geographic locations. Records of all cultural heritage induction training and toolbox talks including the date, content, facilitator's name, language of delivery, and attendance list signed by participants shall be maintained by the contractor ESHS Manager and submitted to the PIU as part of regular ESHS reporting.

Institutional Responsibilities

The PIU Environmental Specialist holds primary responsibility for coordinating and overseeing the implementation of this cultural heritage guidance across all project activities. Specific responsibilities include commissioning or conducting pre-works cultural heritage desk reviews and walkover surveys; reviewing Cultural Heritage Walkover Survey Reports submitted by qualified specialists and contractors; managing the Chance Find Procedure notification process with the National Museum, MICAT, and the World Bank; maintaining the project Cultural Heritage Register; and reporting on cultural heritage management in the project's quarterly E&S Monitoring Reports.

The PIU Social Specialist is responsible for designing and conducting community-based cultural heritage identification processes during stakeholder engagement, participatory land-use planning, and CFMB establishment activities; ensuring that FPIC processes explicitly address cultural heritage dimensions; and monitoring risks to intangible cultural heritage through NTFP commercialization activities. The PIU Gender Specialist shall ensure that women's cultural heritage knowledge and Sande society interests are explicitly incorporated into community consultations through gender-separated engagement sessions where culturally required.

Contractors and subcontractors are responsible for implementing the Chance Find Procedure on their work sites, training all workers on cultural heritage protection as part of ESHS induction, maintaining site records of all chance finds, and reporting to the PIU in accordance with the timelines specified in this guidance. Community facilitation partners are responsible for building the trust



relationships with community cultural knowledge holders that are prerequisite to effective community-based heritage identification.

MICAT and the Liberia National Museum are the competent national authorities for the assessment and disposition of cultural heritage finds, and shall be engaged by the PIU at the earliest opportunity both at the project preparation stage to establish working relationships and communication protocols, and on a case-by-case basis whenever significant cultural heritage is identified or encountered during project activities.

Documentation, Monitoring, and Reporting

The PIU shall establish and maintain a Cultural Heritage Register from the commencement of project activities through to project closure. The register shall record all cultural heritage resources identified across the project area through desk review, community consultation, walkover surveys, and chance finds, documenting for each resource its type, location recorded with sufficient precision for site management while respecting confidentiality requirements cultural significance as described by the community, the management measures applied, and the outcome of those measures. The register shall be updated progressively as new resources are identified throughout project implementation.

Progress on cultural heritage management including the number and outcomes of pre-works assessments conducted, chance finds identified and managed, community consultations undertaken, and FPIC processes completed for intangible heritage use shall be reported in the project's quarterly Environmental and Social Monitoring Reports submitted to the World Bank. Where cultural heritage issues of significant sensitivity, complexity, or potential adverse impact arise during implementation, the PIU shall promptly notify the World Bank Task Team and agree on appropriate management actions before proceeding with the affected activity.



Appendix 12: Chance Find Procedures

1. INTRODUCTION

Both national regulations and World Bank Environment and Social Standards especially, ESS8: Cultural Heritage, recognize the importance of cultural heritage for current and future generations. Though project sites are not yet known, the project design suggests that there will be no impacts on cultural resources. No works is expected to be carried out in cultural heritage areas. Nevertheless, this ESS is conservatively deemed relevant.

Therefore, the purpose of this chance find procedures is to provide The Ministry of Information, Cultural Affairs and Tourism (MICAT) and other parties to the project with the appropriate response guidelines to be applied if previously unknown cultural heritage is encountered. This Chance Find Procedure considers international best practices such as WB ESS8, 1972 UNESCO Convention on the Protection of World Cultural and Natural Heritage (World Heritage Convention) and Liberian policies and laws for cultural resources protection. Thus, Chance Find Procedures (CFPs) are part of the E&S instruments that may have relevance during Project implementation. The Procedure applies to potential cultural heritage objects features or sites identified because of construction activities in the project area and its surroundings.

2. DEFINITIONS

A chance find procedure is a project-specific procedure that outlines actions to be taken if previously unknown cultural heritage is encountered. It is also defined as potential cultural heritage (or paleontological) whether movable or immovable objects, sites, structures, group of structures and natural features and landscapes that have archaeological, historical, religious, and other cultural significance. Cultural heritage recourses may include:

- Artefacts, whole or partial, such as ceramic sherds, stone items, glass fragments, bone, shell, metal, textiles, and plant and animal remains.
- Feature associated with human occupation such as trash dumps, middens, hearths, structural remains.
- Prehistoric or human remains found in formal graves, cemeteries, or as an isolated occurrence.

Non- Cultural Heritage Chance Finds many include modern objects, features, and burials and the decision about whether a Chance Find is a cultural heritage resource requiring additional treatment will be made by the FDA/PIU in consultation with the MICAT where necessary.

3. PROCEDURES

If any person discovers a physical cultural resource, such as (but not limited to) archaeological sites, historical sites, remains and objects or a cemetery and/or individual graves during excavation or construction, the following procedures shall be applied:

1. If the Contractor discovers archaeological sites, historical sites, remains and objects, including graveyard and /or individual graves during excavation or construction, the Contractor shall:
 - Stop the construction activities in area of the chance find.
 - Delineate the discovered site or area.
 - Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be arranged until the responsible local authorities or National Museum takes over.



- Notify the Environmental and Social Safeguard Specialist (ESSS) who in turn will notify responsible local or national authorities in charge of the Cultural Property i.e. MICAT (within 24 hours or less).
 - Relevant local or national authorities would oversee protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed. The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage, those include the aesthetic, historic, scientific or research, social and economic values.
 - Decision on how to handle the finding shall be taken by the responsible authorities. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration, and salvage.
 - If the cultural sites and /or relics are of high value and site preservation is recommended by the professionals and required design changes to accommodate the request and preserve the site.
 - Decisions concerning the management of the finding shall be communicated in writing to relevant authorities.
2. Construction works could resume only after permission is granted from the responsible local authorities concerning safeguarding of the heritage.

3. DOCUMENTATION

The ESSS will ensure that contractors and sub-contractors staff maintain records of monitoring, Chance Finds, and it will include:

- Daily monitoring records indicating areas and activities monitored, report Chance finds and the results of any evaluations.
- Weekly reports summarising reporting period activities including Chance Finds, assessment and evaluations, internal and external communications and instructions and supporting photographic documentation (or other reference material as appropriate). An additional report aimed at fulfilling any specific Ministry requirements is also anticipated.
- Monthly reports summarising monitoring and evaluation results, status of any site treatment measure requiring instructions to contractor(s) sub-contractor(s), and other internal and external communication. Additional monthly reporting may be required by the respective MDA.

5.CULTURAL HERITAGE TRAINING

All proposed project personnel are required to receive and comply with the Code of Conduct and receive training and demonstrate competency in (1) the identification of Chance Finds cultural heritage sites, objects, or features and (2) Chance Finds Management Procedure, that is those actions that are required in the case of suspected Chance Find. This training will be incorporated into the overall induction process for firms, contractor (s), and sub-contractor (s) personnel and will include a quick reference hand-out. All employees must be aware of the Liberian Policies and Laws on cultural heritage and WB ESS 8 that forbids disturbance or removal of cultural heritage objects offsite for personal gain. Disciplinary action should be taken against any personnel who violate this requirement.

6.REPORTING AND COMMUNICATION



Monitoring, review and reporting will be along with the conduct of ESIA/ESMP/ESMF and RP for the proposed project. Contractor (s); Sub-contractor (s) shall report all records on observational monitoring, protection measures, complaints, and damages to the ESSS on monthly and quarterly basis. The ESSS shall report their monitoring records and the Contractor's records to FDA/PIU which will in turn inform relevant authorities e.g., MICAT on case-to-case basis and on a quarterly basis.

7. IMPLEMENTATION ARRANGEMENTS

The implementation arrangement and responsibilities of the Chance Find Procedures shall be as follows:

No.	STAKEHOLDER	RESPONSIBILITY	RESPONSIBLE PERSON
1	FDA/PIU	-Overall coordination - Lead consultation with relevant authorities and local communities -Implement the procedure and provide required funds. - Monitoring the implementation of chance finds procedures and - Prepared required reports.	ESSS
2	Contractors and Sub-Contractors	-Stop the construction activities in the chance find -Install temporary site protection measures; and -Inform the client and document chance finds.	Site engineer/Site foreman
3	MICAT	-Verification of chance finds -Approval of the treatment measures; in consultation with stakeholders. -provide the authorisation to resume works in the chance find area	In charge of tourism, culture, relics and monuments
4	Local Communities	-To attend consultation meetings. -To provide required information. -Participate in treatment measures	Local Population

8. BUDGET

The budget will depend on the chance finds and the proposed treatment measures. However, a provisional sum has been provided in the main ESMF implementation budget.

9. CONCLUSION

The present Chance Find Procedures serve as international best practice policy for the accidental discovery of heritage resources and provide the framework to handle them. Based on the definitions provided within this document and the proposed procedures of communication and handling chance finds, MICAT will be able to deal properly with the accidental discovery of heritage resources throughout the various phase of the project implementation especially during the construction phase.



Appendix 13: Sample Incident Form

Part C: To be completed by Borrower (following investigation)

C1: Investigation Findings

For example:

- I. *Where and when the incident took place:*
- II. *Who was involved, and how many people/households were affected:*
- III. *What happened and what conditions and actions influenced the incident:*
- IV. *what were the expected working procedures and were they followed:*
- V. *Did the organization or arrangement of the work influence the incident:*
- VI. *Were there adequate training/competent persons for the job, and was necessary and suitable equipment available:*
- VII. *What were the underlying causes; where there any absent risk control measures or any system failures:*

C2: Corrective Actions from the investigation to be implemented (To be fully described in Corrective Action Plan)

Action	Responsible Party	Expected Date

Part C cont.: To be completed by Borrower (following investigation)

C3a: Fatality/Lost time Injury information

Immediate cause of fatality/injury for worker or member of the public (please check all that apply)²:

1. Caught in or between objects ☐ 2. Struck by falling objects ☐ 3. Stepping on, striking against, or struck by objects ☐
 4. Drowning ☐ 5. Chemical, biochemical, material exposure ☐ 6. Falls, trips, slips ☐ 7. Fire & explosion ☐
 8. Electrocutation ☐ 9. Homicide ☐ 10. Medical Issue ☐ 11. Suicide ☐ 12. Others ☐

Vehicle Traffic: 13. Project Vehicle Work Travel ☐ 14. Non-project Vehicle Work Travel ☐

15. Project Vehicle Commuting ☐ 16. Non-project Vehicle Commuting ☐ 17. Vehicle Traffic Accident (Members of Public Only) ☐

Name	Age/DOB	Date of Death/Injury	Gender	Nationality	Cause of Fatality/Injury	Worker (Employer)/Public



²See Annex 2 for definitions

C3b: Financial Support/Compensation Types (To be fully described in Corrective Action Plan template)			
1. Contractor Direct ☐ 2. Contractor Insurance ☐ 3. Workman's Compensation/National Insurance ☐ 4. Court Determined Judicial Process ☐ 5. Other ☐ 6. No Compensation Required ☐			
Name	Compensation Type	Amount (US\$)	Responsible Party

C4: Supplementary Narrative



Appendix 14: Occupational Health and Safety (OHS) Procedures

The objective of the procedure is to achieve and maintain a healthy and safe work environment for all project workers (contracted workers and community workers) and the host community.

Legal and Policy: Decent Work Act 2015 (Part VI, Chapter 25); WBG EHS Guidelines (General and Forestry Operations); ESS2 (paragraphs 24-30); LiFE-P Labor Management Procedures.

OHS Risk Register

Activity	Key Hazard	Risk Level	Primary Control Measure
Chainsaw milling / timber felling	Laceration, amputation, falling trees	High	Mandatory PPE (chainsaw chaps, helmet, gloves, boots); felling zone exclusion; daily equipment check
Forest boundary demarcation	Snake bite, falls, heat stress, remote location	High	Snake-bite protocol; buddy system; GPS and communication equipment; hydration schedule
Protected area ranger patrol	Wildlife encounter (hippo, buffalo), security threat, remote injury	High	Ranger patrol protocol; two-person minimum; first aid kit; radio communication
Forest restoration (clearing, planting)	Cuts and lacerations, musculoskeletal strain	Moderate	Gloves, boots, eye protection; PPE for chemical handling; manual handling training
Ecotourism PPP investment	Falls from height, electrical hazards, machinery	Moderate–High	Scaffolding and fall arrest systems; electrical safety inspection; machinery guard
Nursery operations	Chemical exposure (fertilizers), repetitive strain	Moderate	Chemical handling PPE; MSDS available on-site; rotation of tasks
Wood processing facility	Machinery (saws, planers), dust, noise	High	Machine guards; dust extraction; ear protection; respiratory PPE
Office/administrative work	Ergonomic, road safety	Low	Ergonomic workstations; road safety policy

PPE Requirements All project workers exposed to hazardous conditions shall be provided with appropriate PPE at no cost. Minimum PPE by activity:

- Forest field operations: Safety boots, long-sleeved clothing, gloves, first aid kit, communication device
- Chainsaw operations: Chainsaw-protective trousers (chaps), helmet with face visor and ear defenders, cut-resistant gloves, safety boots
- Chemical handling: Chemical-resistant gloves, goggles, apron, respiratory protection
- Construction: Hard hat, safety boots, hi-visibility vest, gloves, fall harness (at height)



- Wood processing: Eye protection, ear defenders, dust mask (FFP2 minimum), machine-specific guards

Emergency Preparedness and Response

- Each project site shall maintain a written Emergency Response Plan (ERP) addressing: fire; medical emergency; snake bite; drowning; chemical spill; security incident
- First aid kits shall be available at all field sites, stocked and inspected monthly; designated first-aider per site (minimum one per 25 workers)
- Emergency evacuation routes posted at all facilities
- Nearest hospital/clinic, emergency contact numbers, and FDA PIU OHS Officer contact posted at all sites
- Snake bite protocol: immobilize limb, do not apply tourniquet, evacuate immediately to medical facility; anti-venom location identified for each target county
- Workers in remote locations shall maintain radio or mobile contact with PIU at minimum twice daily

Incident Reporting

- All work-related injuries, illnesses, near-misses, and dangerous occurrences to be reported to the site supervisor and PIU OHS Officer within 24 hours
- Serious injuries, fatalities, and dangerous occurrences to be reported to the World Bank within 48 hours
- Monthly OHS incident summary submitted to PIU; included in quarterly progress reports
- Root cause analysis conducted for all lost-time injuries

OHS Training All project workers shall receive OHS induction training before commencing work covering: site-specific hazards; PPE use and maintenance; emergency procedures; incident reporting; Code of Conduct (including SEA/SH prohibition). Training shall be conducted in local languages where workers are not literate in English. Records of training (attendance, content, trainer) shall be maintained.



Appendix 15: World Bank general EHS guidelines⁴⁰

Air Emissions and Ambient Air Quality

Water Quality and Availability

WHO Ambient Air Quality Guidelines		
	Averaging Period	Value in $\mu\text{g}/\text{m}^3$
SO ₂	24-hour	125 (Interim target-1)
		50 (Interim target-2)
	10 min	20 (guideline)
		500 (guideline)
NO ₂	1 year	40 (guideline)
	1 hour	200 (guideline)
PM ₁₀	1 year	70 (Interim target-1)
		50 (Interim target-2)
		30 (Interim target-3)
		20 (guideline)
	24-hour	150 (Interim target-1)
		100 (Interim target-2)
		75 (Interim target-3)
		50 (guideline)
PM _{2.5}	1 year	35 (Interim target-1)
		25 (Interim target-2)
		15 (Interim target-3)
		10 (guideline)
	24-hour	75 (Interim target-1)
		50 (Interim target-2)
		37.5 (Interim target-3)
		25 (guideline)
Ozone	8-hour maximum	160 (Interim target-1)
		100 (guideline)

WHO Guideline values for some chemicals that are of health significance in drinking water⁴¹

Chemical	mg/l
Arsenic	0.01
Benzene	0.01
Cadmium	0.003
Carbon tetrachloride	0.004
Chlorine	5
Copper	2
Fluoride	1.5
Lead	0.01
Mercury	0.0006
Nickel	0.07
Nitrate	50
Nitrite	3
Trichloro acetate	0.2

Ambient Noise Quality

Applicable Noise Guidelines		
Receptor	One Hour L _{Aeq} (dBA)	
	Daytime 07:00 - 22:00	Nighttime 22:00 - 07:00
Residential; institutional; educational ⁴²	55	45
Industrial; commercial	70	70

⁴⁰ https://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf?_gl=1*1o0flug*_gcl_au*MjUzMzQ3OTI3LjE3MTkzMjI0MDA.

⁴¹ https://cdn.who.int/media/docs/default-source/wash-documents/water-safety-and-quality/dwq-guidelines-4/gdwq4-with-add1-annex3.pdf?sfvrsn=f5f6be22_3

⁴² For acceptable indoor noise levels for residential, institutional, and educational settings refer to WHO (1999).



Appendix 16: Consultation Timetable and Attendance log

Monrovia Consultation Itinerary

Date	Time	Activities	Group	Expected # of Participants	Venue	Remark
March 24, 2026	10:00 am - 10:05am	Welcome remark	EPA, MoA, LLA, MME, UL, NDMA, LNP, NSA, LIS, MoD, MoJ, LNFS, MFDP, NIC, NBC, LRA, MoCI, LEITI, LISGIS, CDA, MoL, MIA, MGCSP, CBL	64	Royal Grand Hotel, Monrovia	Presentations on the Overview of LiFE Project Components, and E&S
	10:05am – 10:20am	Overview of LiFE-P				
	10:25am – 11:00am	Presentation on Component One Q&A				
	11:05am – 11:40pm	Presentation on Component Two Q&A				
	11:45am – 12:20am	Presentation on Component Three				
	LUNCH					
	1:00pm – 1:45pm	Presentation on ESF Q&A				
March 25, 2026	10:00am – 2:00pm	Welcome remark	SCNL, TNC, WCF, PADEV, CI, FF, PARLEY, CRS, PLAN, CHI, SDI, IDL, UNDP, FAO, IFAD, EU, IFC, VOSIEDA, LICSATDUN, UOF, LBA, LTA, NUCFMB, NUCFDC,	70	Royal Grand Hotel, Monrovia	Presentations on the Overview of LiFE Project Components, and E&S
	10:05am – 10:20am	Overview of LiFE-P				
	10:25am – 11:00am	Presentation on Component One Q&A				
	11:05am – 11:40pm	Presentation on Component Two Q&A				
	11:45am – 12:20am	Presentation on Component Three				
	LUNCH					
	1:00pm – 1:45pm	Presentation on ESF Q&A				



Forestry Development Authority (FDA)

Liberia Forest Economy Project (LIFE-P)

Republic of Liberia

Stakeholder Engagement Consultation Meeting for GoL MACs

Date:

March 24, 2020

Attendance Sheet

No.	Name	Sex	Institution	Position	Email	Contact #	Signature
1	Zebian N. Kieh	M	FDA/LVA	Manager	F.Kieh@yahoo.com	077742789	[Signature]
2	Maxwell B. Barber	M	FDA	Adm. Asst.	maxbarber30@gmail.com	0886920218	[Signature]
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Stakeholder Engagement Consultation Meeting for GoL MACs

Date: March 24, 2026

[illegible]



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Forestry Development Authority (FDA)

Liberia Forest Economy Project (LIFE-P)

Republic of Liberia

Stakeholder Engagement Consultation Meeting for NGOs/CSO/Private Sector

Date: March 25, 2016

Attendance Sheet

No.	Name	Sex	Institution	Position	Email	Contact #	Signature
1.	Joseph G. Anselah	M	FDA/SPN	Manager	jdanselah@gmail.com	086664890	
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18.	Peace A. Quiminde	F	CI	Program Mgr.	peacequiminde@conservation.org	0770480413	



Republic of Liberia

Date: March 25, 2020

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Forestry Development Authority (FDA)

LIBERIA FOREST ECONOMY PROJECT-LIFE-P

Stakeholder Engagement

Date: April 2, 2026

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Forestry Development Authority (FDA)

Liberia Forest Economy Project (LiFE-P)

Republic of Liberia

Draft Stakeholder Engagement Regional Consultation Schedule

Date	Venue	Consultation Meeting	Participants	Key Issues to Discuss
April 3-4, 2026 (Including travel day from Monrovia)	Gbarpolu County	Consultation with designated stakeholders, outlining the E&S instruments (in local languages) required for stakeholders inputs in the development of the project Environmental and Social Framework (ESF).	GoL representatives/ Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council Youth Leaders Women Leaders Women/Girls Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers Loggers/Timber processors & sawmill operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB Lofa University FDA-E&S/WB team	• Overview of the project objectives • Presentation on requirements for the ESF in keeping with the World Bank Environmental and Social Standards (ESS1-ESS10). • Presentation on Sexual Exploitation and Abuse/Sexual Harassment/Gender-Based Violence Action Plan (SEA/SH/GBV) • Question and Answer • Discussion • Feedbacks from participants

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April 5-6, 2026 (Including travel day to Monrovia)	Grand Cape Mount County	Consultation with designated stakeholders, outlining the E&S instruments (in local languages) required for stakeholders inputs in the development of the project Environmental and Social Framework (ESF).	GoL representatives/ Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council Youth Leaders Women Leaders Women/Girls Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers Loggers/Timber processors & sawmill operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB Lofa University FDA-E&S/WB team	• Overview of the project objectives • Presentation on requirements for the ESF in keeping with the World Bank Environmental and Social Standards (ESS1-ESS10). • Presentation on Sexual Exploitation and Abuse/Sexual Harassment/Gender-Based Violence Action Plan (SEA/SH/GBV) • Question and Answer • Discussion • Feedbacks from participants
April 7-8, 2026 (Including travel day from Monrovia)	Lofa	Consultation with designated stakeholders, outlining the E&S instruments (in local languages) required for stakeholders inputs in the development of the project Environmental and Social Framework (ESF).	GoL representatives/ Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council Youth Leaders Women Leaders Women/Girls Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers Loggers/Timber processors & sawmill operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB Lofa University FDA-E&S/WB team	• Overview of the project objectives • Presentation on requirements for the ESF in keeping with the World Bank Environmental and Social Standards (ESS1-ESS10). • Presentation on Sexual Exploitation and Abuse/Sexual Harassment/Gender-Based Violence Action Plan (SEA/SH/GBV) • Question and Answer • Discussion • Feedbacks from participants
April 9-10, 2026 (Including travel day)	Nimba	Consultation with designated stakeholders, outlining the E&S instruments (in local languages) required for stakeholders inputs in the development of the project Environmental and Social Framework (ESF).	GoL representatives/ Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council Youth Leaders Women Leaders Women/Girls Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers	• Overview of the project objectives • Presentation on requirements for the ESF in keeping with the World Bank Environmental and Social Standards (ESS1-ESS10). • Presentation on Sexual Exploitation and Abuse/Sexual Harassment/Gender-Based Violence Action Plan (SEA/SH/GBV)

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			Loggers/Timber processors & sawmill operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB Nimba University FDA-E&S/WB team	• Question and Answer • Discussion • Feedbacks from participants
April 11-12, 2026 (Including travel day)	Grand Gedeh County	Consultation with designated stakeholders, outlining the E&S instruments (in local languages) required for stakeholders inputs in the development of the project Environmental and Social Framework (ESF).	GoL representatives/ Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council Youth Leaders Women Leaders Women/Girls Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers Loggers/Timber processors & sawmill operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB FDA-E&S/WB team	• Overview of the project objectives • Presentation on requirements for the ESF in keeping with the World Bank Environmental and Social Standards (ESS1-ESS10). • Presentation on Sexual Exploitation and Abuse/Sexual Harassment/Gender-Based Violence Action Plan (SEA/SH/GBV) • Question and Answer • Discussion • Feedbacks from participants
April 13-14, 2026 (Including travel day)	River Gee County	Consultation with designated stakeholders, outlining the E&S instruments (in local languages) required for stakeholders inputs in the development of the project Environmental and Social Framework (ESF).	GoL representatives/ Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council Youth Leaders Women Leaders Women/Girls Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers Loggers/Timber processors & sawmill operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB FDA-E&S/WB team	• Overview of the project objectives • Presentation on requirements for the ESF in keeping with the World Bank Environmental and Social Standards (ESS1-ESS10). • Presentation on Sexual Exploitation and Abuse/Sexual Harassment/Gender-Based Violence Action Plan (SEA/SH/GBV) • Question and Answer • Discussion • Feedbacks from participants

ESMF – LMP LiFE-P (P508345)



April 15-16, 2026 (Including travel day)	Maryland County	Consultation with designated stakeholders, outlining the E&S instruments (in local languages) required for stakeholders inputs in the development of the project Environmental and Social Framework (ESF).	GoL representatives/ Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council Youth Leaders Women Leaders Women/Girls Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers Loggers/Timber processors & sawmill operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB/ Tubman University FDA-E&S/WB team	• Overview of the project objectives • Presentation on requirements for the ESF in keeping with the World Bank Environmental and Social Standards (ESS1-ESS10). • Presentation on Sexual Exploitation and Abuse/Sexual Harassment/Gender-Based Violence Action Plan (SEA/SH/GBV) • Question and Answer • Discussion • Feedbacks from participants
April 16-17, 2026 (Including travel day)	Grand Kru County	Consultation with designated stakeholders, outlining the E&S instruments (in local languages) required for stakeholders inputs in the development of the project Environmental and Social Framework (ESF).	GoL representatives/ Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council Youth Leaders Women Leaders Women/Girls Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers Loggers/Timber processors & sawmill operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB FDA-E&S/WB team	• Overview of the project objectives • Presentation on requirements for the ESF in keeping with the World Bank Environmental and Social Standards (ESS1-ESS10). • Presentation on Sexual Exploitation and Abuse/Sexual Harassment/Gender-Based Violence Action Plan (SEA/SH/GBV) • Question and Answer • Discussion • Feedbacks from participants
April 18-19, 2026 (Including travel day)	Sinoe County	Consultation with designated stakeholders, outlining the E&S instruments (in local languages) required for stakeholders inputs in the development of the project Environmental and Social Framework (ESF).	GoL representatives/ Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council Youth Leaders Women Leaders Women/Girls Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers Loggers/Timber processors & sawmill	• Overview of the project objectives • Presentation on requirements for the ESF in keeping with the World Bank Environmental and Social Standards (ESS1-ESS10). • Presentation on Sexual Exploitation and Abuse/Sexual Harassment/Gender-Based Violence Action Plan (SEA/SH/GBV) • Question and Answer



			operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB FDA-E&S/WB team	• Discussion • Feedbacks from participants
April 20-21, 2026 (Including travel day)	Rivercess County	Consultation with designated stakeholders, outlining the E&S instruments (in local languages) required for stakeholders inputs in the development of the project Environmental and Social Framework (ESF).	GoL representatives/ Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council Youth Leaders Women Leaders Women/Girls Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers Loggers/Timber processors & sawmill operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB FDA-E&S/WB team	• Overview of the project objectives • Presentation on requirements for the ESF in keeping with the World Bank Environmental and Social Standards (ESS1-ESS10). • Presentation on Sexual Exploitation and Abuse/Sexual Harassment/Gender-Based Violence Action Plan (SEA/SH/GBV) • Question and Answer • Discussion • Feedbacks from participants
April 22-23, 2026 (Including travel back to Monrovia)	Grand Bassa County	Consultation with designated stakeholders, outlining the E&S instruments (in local languages) required for stakeholders inputs in the development of the project Environmental and Social Framework (ESF).	GoL representatives/ Paramount Chiefs/Clan Chiefs/Town Chiefs/Rep. of Traditional Council Youth Leaders Women Leaders Women/Girls Forest Rangers/Community Forest Guards/ Agriculture Coordinators/Small scale farmers/NTFP producers Loggers/Timber processors & sawmill operators/Timber and NTFP MSMEs/CFMB/CFDC/CLDMC/NUCFMB Grand Bassa University FDA-E&S/WB team	• Overview of the project objectives • Presentation on requirements for the ESF in keeping with the World Bank Environmental and Social Standards (ESS1-ESS10). • Presentation on Sexual Exploitation and Abuse/Sexual Harassment/Gender-Based Violence Action Plan (SEA/SH/GBV) • Question and Answer • Discussion • Feedbacks from participants

Appendix 17: Photo Log







Appendix 18: Sample Code of Conduct for Contractors' GBV/SEA/SH Prevention and Response

To build a system for SEA/SH risk prevention and mitigation, projects must:

- Have all employees of contractors (including sub-contractors), supervising Engineers and other consultants with a footprint on the ground in the project area sign CoCs.
- Have an effective SEA/SH Prevention and Response Action Plan so that workers understand behavior expectations and policies, as well as an effective GM. This Action Plan should include training and communication. It should also include plans to make the project-affected community aware of the CoC the project staff have just signed; and
- As part of the SEA/SH Prevention and Response Action Plan, define accountability and response protocols, which set out the procedures followed for holding individuals accountable and penalizing staff that have violated SEA/SH policies.

Note to the Employer:

The following minimum requirements shall not be modified. The Employer may add additional requirements to address identified issues, informed by relevant environmental and social assessment.

The types of issues identified could include risks associated with: labor influx, spread of communicable diseases, Sexual Exploitation and Sexual Abuse (SEA) etc.

Sample Code of Conduct for Contractor's Personnel

We are the Contractor, **[enter name of Contractor]**. We have signed a contract with **[enter name of Employer]** for **[enter description of the Works]**. These Works will be carried out at **[enter the Site and other locations where the Works will be carried out]**. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation and abuse and gender-based violence.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, laborers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as **"Contractor's Personnel"** and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor's Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

Contractor's Personnel shall:

1. carry out his/her duties competently and diligently
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person
3. maintain a safe working environment including by:



- a. ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health
 - b. wearing required personal protective equipment
 - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d. following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;
 5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
 6. not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
 7. not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank-financed projects/operations, sexual exploitation occurs when access to or benefit from Bank-financed Goods, Works, Consulting or Non-consulting services is used to extract sexual gain;
 8. not engage in Rape, which means physically forced or otherwise coerced penetration—even if slight—of the vagina, anus or mouth with a penis or other body part. It also includes penetration of the vagina or anus with an object. Rape includes marital rape and anal rape/sodomy. The attempt to do so is known as attempted rape. Rape of a person by two or more perpetrators is known as gang rape;
 9. not engage in Sexual Assault, which means any form of non-consensual sexual contact that does not result in or include penetration. Examples include: attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
 10. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation, and Sexual Abuse (SEA);
 11. report violations of this Code of Conduct; and
 12. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the [Project Grievance [Redress] Mechanism].

RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact ***[enter name of the Contractor's Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters]*** in writing at this address [] or by telephone at [] or in person at []; or



2. Call [] to reach the Contractor's hotline (if any) and leave a message.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities. FOR CONTRACTOR'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact **[enter name of Contractor's contact person with relevant experience in handling gender-based violence]** requesting an explanation.

Name of Contractor's Personnel: [insert name]

Signature:

Date: (day month year): _

Counter signature of authorized representative of the Contractor:

Signature: _____ Date: (day month year): _



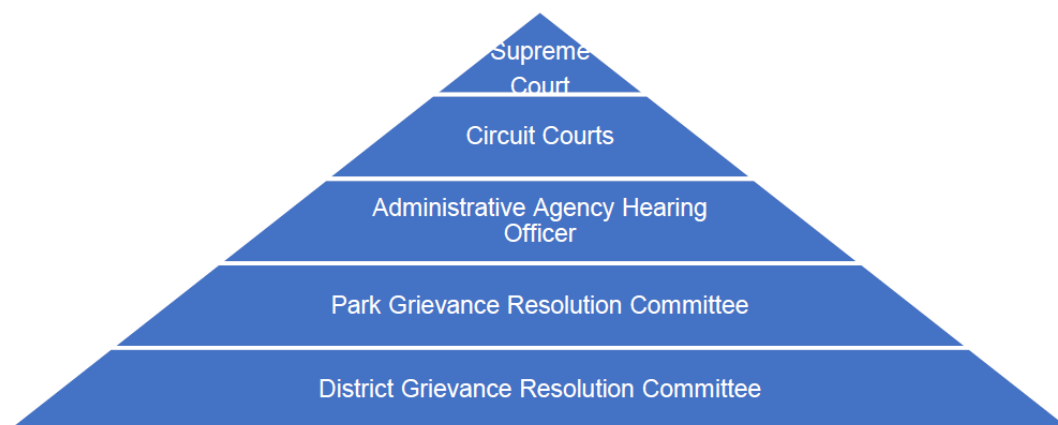
Appendix 19: Sample Process for Feedback Grievance Mechanism (FGM)

Objective of the FGM

The objective of these FGM is to provide a set of clear and traceable procedures by which any grievance arising from or in connection with management of the SNP (action by Park rangers and other FDA staff as well as other public officers/servants) can be reported by an affected person, and then heard and resolved mainly through an informal, traditional dispute resolution process that is consistent with best practice and the requirements of donors and partners, including the World Bank Group.

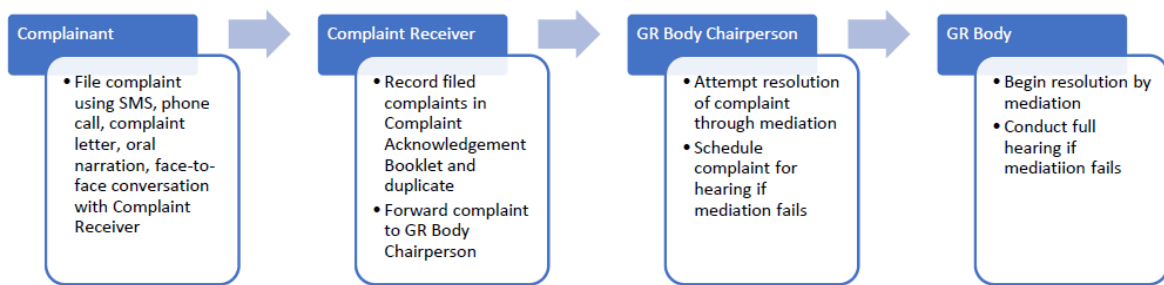
In particular, the objective of the FGM includes the following:

- To establish clear and simple-to-use procedures for making, hearing and resolving complaints against acts taken by employees of FDA, community and/or other government agencies in enforcing the protective status of the PAs, which adversely affect either one or more members or residents of a community or a community itself;
- To provide mechanism for mediation, arbitration and other non-judicial settlement of all grievances arising from management of PAs in a way that engenders cooperation among PA stakeholders and ultimately promotes cooperation in the management of the Park
- To specify how, where and when a complaint may be made, heard and resolved; including the range of remedies recoverable and sanctions that may be imposed or for violations of the protective status of PAs;
- To document existing or establish FGM community structures, recognize, train and empower community bodies and mechanism in the resolution of grievances in the Park and/or among park stakeholders;
- To provide an interface between (i) community disputes resolution mechanisms and (ii) national administrative and judicial dispute resolution bodies and processes;
- To ensure compliance with the social safeguards frameworks of the World Bank, which is supporting management of PAs;
- To provide for dialogue and engagement among PA stakeholders for managing and monitoring agreed procedures for resolving disputes, including these FGM

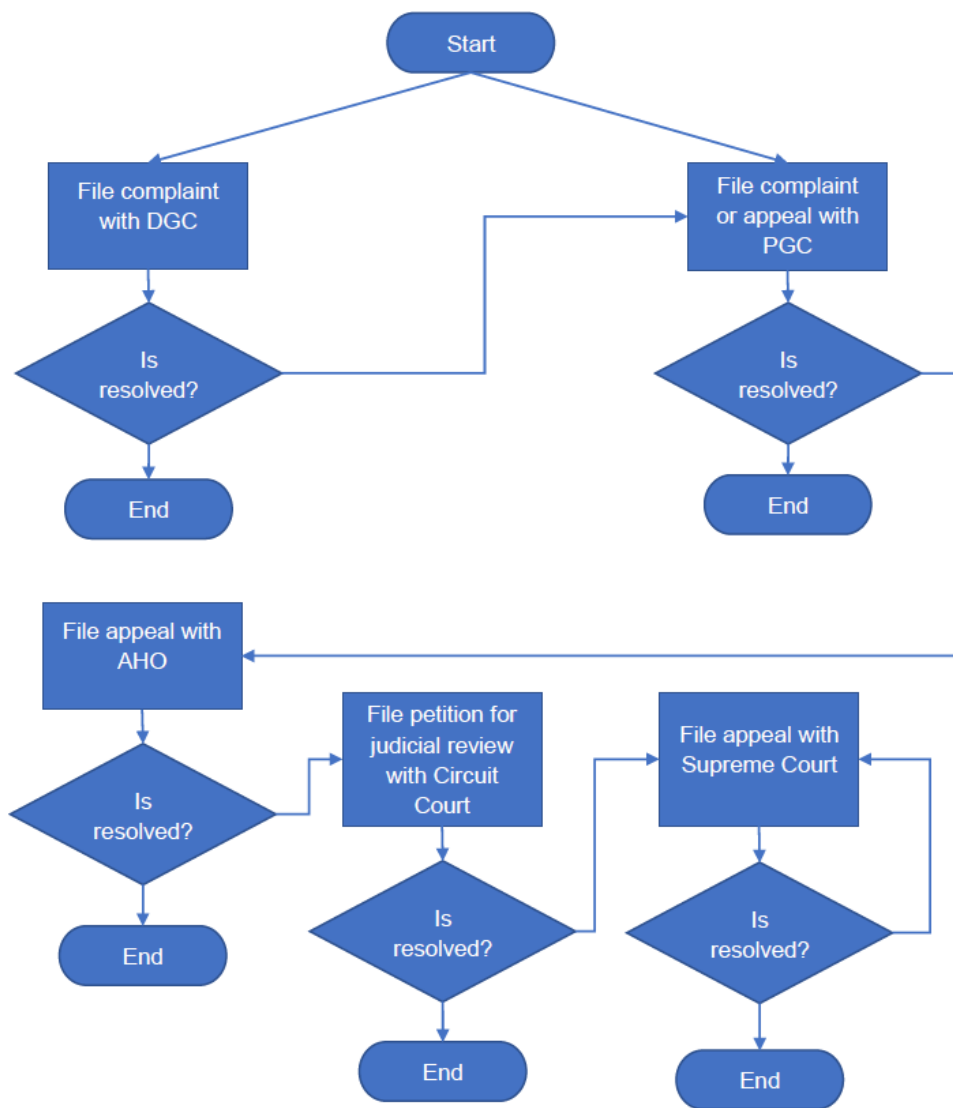




Pyramid showing the various GR bodies and their intended share of the GM



Process chart above depicts filing and handling of complaints under the GM



Flow Chart dispute showing the process of filing complaints and the taking, hearing and resolution of appeals



Appendix 20: Sample GM Forms

1. Grievance Information Form

Date/Time received:	Date: (dd-mm-yyyy) ☐ Time: am ☐ pm	Grievance ID #:
Name of Complainant:		☐ You can use my name, but do not use it in public. ☐ You can use my name when talking about this concern in public. ☐ You cannot use my name at all.
Company (if applicable)		☐ You can use my company name, but do not use it in public. ☐ You can use my company name when talking about this concern in public. ☐ You cannot use my company name at all
Contact Information:	Phone: Email address: Address: Location: (Kindly indicate the preferred language and method of communication)	
Status of Occurrence	☐ One-time incident/complaint ☐ Happened more than once (indicate how many times): ☐ Ongoing (a currently existing problem)	

Grievant/Complainant Signature (if applicable)

Date (dd-mm-yyyy)

Project personnel Signature (to confirm receipt only)

Date (dd-mm-yyyy)

For PCU use only:

Grievance No: _____ Grievance Category:

☐ Problems during material transport

☐ Smell

☐ Blocked road access

☐ Problem with project staff

☐ Dust

☐ Other (specify): _____

☐ Noise

Grievance Owner/ Department: _____

Grievant/Complainant Signature (if applicable)

2: Grievance Acknowledgement Form (GAF)

The project acknowledges receipt of your complaint and will contact you within 10 working days.

Grievance ID #:	
Date of grievance/complaint: (dd/mm/yyyy)	
Name of Grievant/Complainant:	
Complainant's Address and Contact	
Information:	
Summary of Grievance/Complaint: (Who, what, when, where)	



Name of Project Staff Acknowledging Grievance:	
Signature:	
Date: (dd/mm/yyyy)	

3: Disclosure/Release Form

Grievance ID #:	
Name of Grievant/Complainant:	
Date of Complaint:	
Summary of Complaint:	
Summary of Resolution:	
Resolved at:	
Date of grievance resolution (dd/mm/yyyy)	☐ First Level ☐ Second Level ☐ Third Level

Grievant/Complainant Signature (if applicable)
 Project personnel Signature (to confirm receipt only)

Date (dd-mm-yyyy)
 Date (dd-mm-yyyy)

4: Grievance Redressal Registration Monitoring Sheet

No	Grievance ID #	Name of Grievant / complainant	Date Received	Grievance Description	Name of Grievant Owner	Action(s) to be taken	Responsible Unit	Due Date	Result(s) of Intervention	Closing Date of Complain



Appendix 21 Sample Outline of Contractor ESMP (C-ESMP)

PART A: INTRODUCTION

This Sample Contractor Environmental and Social Management Plan (C-ESMP) provides a standardized framework that all contractors and subcontractors engaged under LiFE-P are required to adapt, complete, and submit for review and clearance by the PIU Environmental Specialist before commencing any physical works or significant field activities financed under the project. The C-ESMP is a site-specific and activity-specific document. The C-ESMP is a living document. It shall be reviewed and updated by the contractor at least every six months during implementation, or whenever there is a significant change in the scope, location, or methodology of the contracted works, and resubmitted to the PIU for review. The PIU Environmental Specialist and Social Specialist shall review the C-ESMP and confirm clearance in writing before any works commence. No contractor shall begin physical works without a cleared C-ESMP in place.

Scope of Application

This C-ESMP framework applies to all contractors and subcontractors engaged for physical works and significant field activities under LiFE-P, including but not limited to: rehabilitation of the Forestry Training Institute and Service Excellence Center facilities; construction of CFMB offices across the 20 Community Forest Management Areas; installation of boundary markers and demarcation infrastructure; establishment of community woodlots, plantation rehabilitation, and degraded forest restoration works; construction of ranger stations and patrol infrastructure within and adjacent to protected areas; and any road works, earthworks, or civil infrastructure constructed under the PPP project preparation facility. Contractors engaged for purely advisory, technical assistance, or training activities without a significant physical footprint are not required to prepare a full C-ESMP but shall comply with applicable sections of the ESMF and the Labour Management Procedures.

PART B: PROJECT AND CONTRACT DESCRIPTION

Contract Information

In this section, the contractor shall provide complete identifying information for the contract, including the full name of the contracting entity and any subcontractors; the contract reference number and title; the name and contact details of the contractor's designated Environmental, Social, Health, and Safety (ESHS) Manager responsible for C-ESMP implementation; the contract value and anticipated duration; and the name and contact details of the PIU supervisor responsible for overseeing the contract.

Description of Contracted Works

The contractor shall provide a clear and detailed description of the physical works or field activities covered by the contract, including the type, nature, and sequence of construction or implementation activities; the total area of land affected or disturbed by the works; the estimated quantities of materials to be used, stored, and disposed of; the types and volumes of waste expected to be generated; the equipment and machinery to be used on site; and the estimated workforce size, composition, and accommodation arrangements. This description shall be sufficiently detailed to enable the PIU Environmental Specialist to assess the completeness and adequacy of the environmental and social mitigation measures proposed in subsequent sections of the C-ESMP.

Site Description and Location



The contractor shall describe the physical location of all work sites covered by the contract, including GPS coordinates, county, district, and CFMA or protected area name where applicable. The site description shall include a characterization of the surrounding land use and natural environment covering vegetation cover, proximity to watercourses, wetlands, or ecologically sensitive habitats; proximity to community settlements, agricultural lands, and cultural heritage sites; soil conditions and topography; and any known site-specific environmental or social sensitivities identified during the E&S screening and due diligence process. A site map or sketch showing the work area in relation to surrounding features shall be appended to the C-ESMP.

Regulatory and Permit Status

The contractor shall confirm the status of all required environmental permits and regulatory authorizations for the contracted works. This includes confirmation that the required Liberia EPA EIA license or Certificate of Approval has been obtained by the project proponent (FDA/PIU) and that the contractor is aware of and will comply with all conditions attached to that permit. Where works require additional permits or authorizations such as water abstraction permits, road closure approvals, or forest use permits under the NFRL the contractor shall list these, confirm their status, and provide copies as appendices to the C-ESMP.

PART C: ENVIRONMENTAL AND SOCIAL MANAGEMENT RESPONSIBILITIES

Contractor's ESHS Management Structure

The contractor shall describe its internal organizational structure for environmental, social, health, and safety management, clearly identifying the roles and responsibilities of all staff with ESHS functions. At a minimum, the contractor shall designate a qualified ESHS Manager with relevant experience in environmental and social management for construction or forestry works who is responsible for overall C-ESMP implementation, site inspections, incident reporting, staff training, and liaison with the PIU Environmental and Social Specialists. For large contracts involving significant civil works, a dedicated ESHS team may be required rather than a single ESHS Manager, and this shall be specified in the contract. The contractor shall also identify a senior management representative with overall accountability for ESHS performance and for ensuring that adequate resources human, financial, and logistical are allocated to C-ESMP implementation throughout the contract period.

Subcontractor ESHS Management

Where the contractor engages subcontractors to carry out portions of the contracted works, the contractor shall describe the mechanisms through which ESHS requirements will be extended to and enforced across all subcontractors. This includes: the incorporation of binding ESHS obligations in all subcontract agreements; the contractor's procedures for reviewing and approving subcontractor ESHS plans or equivalent measures before subcontractors commence work; and the contractor's approach to monitoring and auditing subcontractor ESHS performance throughout implementation. The contractor remains fully responsible for the ESHS performance of all subcontractors and cannot transfer this responsibility through subcontracting arrangements.

PART D: ENVIRONMENTAL MITIGATION MEASURES

Site Preparation and Land Clearance

The contractor shall describe the specific measures it will implement to minimize the environmental footprint of site preparation and land clearance activities. This shall include measures to restrict land clearing to the minimum area necessary for the contracted works; to protect vegetation outside the



designated work area from damage by equipment and workers; to retain topsoil from cleared areas for subsequent reinstatement and rehabilitation; to protect existing trees and root zones at the boundary of work areas; to prevent the spread of invasive plant species during clearance operations; and to ensure that no burning of cleared vegetation is conducted without prior PIU approval and in compliance with Liberia EPA standards.

Soil and Erosion Management

Given Liberia's high annual rainfall exceeding 4,000 millimeters in some project counties — soil erosion and sedimentation are significant risks at all civil works and land-based activity sites. The contractor shall describe the specific erosion and sediment control measures it will implement, including installation of silt fences, sediment traps, and check dams at appropriate locations; phasing of land disturbance activities to minimize the area of exposed soil at any one time; prompt revegetation or mulching of disturbed surfaces; stabilization of cut slopes, embankments, and road edges; and regular inspection and maintenance of erosion control structures, particularly before and after rainfall events. For works on steep slopes — particularly in Lofa County, Grand Cape Mount, and Gbarpolu the contractor shall prepare a specific slope stabilization and erosion control plan.

Water Resources and Watercourse Protection

The contractor shall describe the measures it will implement to protect surface water bodies rivers, streams, wetlands, and lake margins from contamination, sedimentation, and physical damage resulting from the contracted works. This shall include establishment and enforcement of buffer zones of at least 30 meters between all construction and land disturbance activities and the nearest watercourse or wetland boundary; measures to prevent the discharge of cement, concrete washings, fuels, lubricants, chemicals, or other pollutants into watercourses; containment of all fuel and chemical storage areas with secondary bunded containment; and management of site drainage to direct surface runoff through sediment settling systems before discharge. For works near Piso Lake whose fragile coastal lake ecosystem is particularly sensitive to construction-related disturbance the contractor shall prepare a detailed water quality protection plan as an annex to the C-ESMP.

Waste Management

The contractor shall describe its approach to managing all categories of waste generated by the contracted works, covering solid construction and demolition waste, organic waste from land clearance, domestic waste from worker accommodation, liquid waste and wastewater from site operations, and hazardous waste including used oils, lubricants, chemicals, fuel containers, and e-waste from demolished IT or electrical equipment. The waste management description shall specify the types and estimated volumes of each waste category; the on-site segregation, storage, and handling arrangements; the designated disposal sites and disposal methods for each waste category; the contracted waste disposal service providers and their regulatory compliance status; and the measures in place to ensure that no waste is burned, buried on site, or discharged into watercourses. For works involving asbestos removal possible in older buildings at the FTI campus the contractor shall prepare a specific asbestos management plan consistent with Liberia EPA requirements.

Air Quality Management

The contractor shall describe the measures it will implement to control dust and air emissions generated by earthworks, material transport, equipment operation, and construction activities. These shall include regular watering of unpaved access roads and construction areas during dry conditions; covering of trucks transporting sand, gravel, or other particulate materials; maintenance of equipment and vehicles



to minimize exhaust emissions; and restriction of dust-generating activities during high-wind conditions. For works within or immediately adjacent to protected areas and ecologically sensitive habitats, the contractor shall implement additional dust suppression measures to prevent deposition of particulates on sensitive vegetation.

Noise and Vibration Management

The contractor shall describe the measures it will implement to manage noise and vibration from construction equipment, machinery, and vehicles particularly in proximity to community settlements, schools, health facilities, and ecologically sensitive areas. These shall include restriction of noisy construction activities to daytime hours (7:00 AM to 6:00 PM on weekdays and Saturdays; no noisy works on Sundays or public holidays); maintenance of equipment to minimize noise emissions; use of vibration-dampening measures for pile driving or heavy compaction works near sensitive structures or habitats; and community notification in advance of any particularly noisy or vibration-intensive operations.

Biodiversity and Habitat Protection

For all works in or adjacent to protected areas, CFMA boundaries, proposed protected areas, or areas of high biodiversity value, the contractor shall describe the specific measures it will implement to avoid, minimize, and mitigate impacts on wildlife and habitats. These shall include measures to prevent workers from hunting, trapping, fishing, or collecting wildlife or plants within or near the work area; requirements for workers to report wildlife sightings particularly of large or sensitive species such as chimpanzees, pygmy hippopotamuses, and forest elephants to the ESHS Manager immediately; protocols for encountering dangerous wildlife during works; prohibition on keeping wildlife as pets or mascots; prevention of the introduction of invasive species through imported planting stock or construction materials; and strict enforcement of the prohibition on wildlife trade within the contractor's labor force. For works at Gola Forest National Park, the contractor shall coordinate with FDA conservation staff to establish site-specific wildlife protection protocols before works commence.

Cultural Heritage Protection

The contractor shall describe the measures it will implement to identify and protect physical cultural heritage including sacred forests, burial grounds, historic structures, archaeological deposits, and sites of spiritual significance within and adjacent to the work area. Prior to commencing works, the contractor shall conduct a preliminary cultural heritage walkover survey in consultation with community elders and CFMB representatives to identify known heritage sites, and shall establish exclusion zones around all identified sites. The contractor shall implement and enforce a Chance Find Procedure described in detail in the C-ESMP specifying the steps to be followed if previously unknown cultural heritage items or archaeological materials are encountered during excavation or land clearance, including immediate work stoppage, notification of the PIU and relevant government authorities, and waiting for professional assessment and clearance before resuming works.

PART E: SOCIAL MITIGATION MEASURES**Community Engagement and Information Disclosure**

The contractor shall describe its approach to engaging with communities in the vicinity of work sites before and during implementation. Prior to commencing works, the contractor's ESHS Manager shall hold an introductory community meeting at each work site to disclose the nature, duration, and anticipated impacts of the planned works; explain the C-ESMP and the measures in place to protect



community health, safety, and livelihoods; introduce the contractor's GM channel and the community focal point contact details; and invite community questions and concerns. Records of all community meetings — including attendance lists, issues raised, and responses provided shall be maintained by the ESHS Manager and made available to the PIU upon request. During implementation, the contractor shall provide advance notification to communities of any particularly disruptive activities such as road closures, or night-time works at least 48 hours before commencement.

Community Health and Safety

The contractor shall describe the specific measures it will implement to protect the health and safety of communities in the vicinity of work sites from construction-related hazards. These shall include physical demarcation and fencing of all active work areas to prevent unauthorized access; installation of clearly visible warning signs in English and relevant local languages at all site entry points and hazardous locations; management of construction vehicle movements to minimize traffic hazards on community roads, including designated vehicle routes, speed limits, and flagging of construction vehicles at community road crossings; dust and noise management measures as described above; and safe management of all site drainage and runoff to prevent flooding of community areas or contamination of community water sources.

Land Access and Temporary Disruption of Livelihoods

Where the contracted works require temporary access to or use of community land, agricultural plots, forest resources, or other assets, the contractor shall describe the procedures it will follow to negotiate and document access arrangements with the landowners or users concerned, ensure that temporary land access agreements are concluded before works commence and are documented in writing, compensate affected households for any temporary loss of income or productive assets at replacement cost rates agreed with the PIU and consistent with the project's Resettlement Framework, and restore all temporarily used land, crops, and structures to their pre-works condition upon completion of the contract.

Labor Influx Management

For contracts expected to generate significant immigration of workers from outside the host community, the contractor shall prepare and implement a Labor Influx Management Plan as an annex to the C-ESMP. The Labor Influx Management Plan shall cover the estimated number and origin of migrant workers; the accommodation arrangements and minimum standards for worker housing, water, sanitation, and food; protocols for worker conduct in the host community; measures to prevent demand for commercial sex and to minimize GBV and SEA risks; worker awareness and sensitization sessions on community relations, the Code of Conduct, and GBV prevention; and coordination mechanisms with the host community and local government authorities for managing any incidents involving project workers.

Code of Conduct

The contractor shall prepare a site-specific Code of Conduct applicable to all workers engaged on the contract including direct employees, subcontractor workers, and workers sourced through brokers or intermediaries. The Code of Conduct shall cover, at a minimum: prohibition of GBV, SEA, and sexual harassment; prohibition of discrimination on the basis of gender, ethnicity, disability, religion, or age; prohibition of child labor and forced labor; prohibition of hunting, fishing, trapping, or collecting wildlife and plants; prohibition of illegal logging, charcoal production, or unauthorized land clearance in the vicinity of the work site; prohibition of alcohol consumption during working hours; prohibition of damage to community property or natural resources; requirements for respectful conduct toward



community members; and the consequences of Code of Conduct violations, up to and including dismissal. All workers shall sign the Code of Conduct before commencing work, and signed copies shall be retained by the ESHS Manager and made available to the PIU upon request.

PART F: OCCUPATIONAL HEALTH AND SAFETY

OHS Management System

The contractor shall describe its overall approach to managing occupational health and safety on the work site, including the organizational arrangements, policies, procedures, and resources it will deploy to prevent workplace accidents, injuries, and occupational diseases. This shall include the contractor's OHS policy; the roles and responsibilities of the ESHS Manager and supervisors in implementing OHS measures; the procedures for identifying and assessing OHS hazards before and during works; the hierarchy of controls applied to identified hazards (elimination, substitution, engineering controls, administrative controls, and personal protective equipment); the arrangements for emergency response and first aid; and the system for OHS incident reporting, investigation, and corrective action.

Activity-Specific OHS Measures

The contractor shall describe the specific OHS measures applicable to each major category of work activity covered by the contract. For construction and civil works, this shall include measures for working at height, excavation and trenching safety, electrical safety, crane and lifting operations safety, and protection from falling objects. For forestry-related activities including plantation establishment, woodlot operations, and restoration works it shall include chainsaw safety protocols, tree felling and extraction procedures, wildlife encounter protocols, and measures to prevent heat stress and physical exhaustion during dry season field operations. For industrial processing operations at the FTI Service Excellence Center, it shall include measures for safe operation of sawmilling equipment, kiln drying units, and other heavy processing machinery, including machine guarding, noise protection, respiratory protection from sawdust, and lockout/tagout procedures for machinery maintenance.

Personal Protective Equipment

The contractor shall specify the personal protective equipment (PPE) required for each work activity covered by the contract and confirm that adequate quantities of appropriate PPE will be provided to all workers at no cost, that PPE will be maintained in good condition and replaced when damaged or worn, and that workers will be trained in the correct use and maintenance of all PPE before commencing works. PPE requirements shall be differentiated by work activity for example, helmets, safety boots, gloves, and eye protection for construction works; chainsaw chaps, helmets with face visor, hearing protection, and cut-resistant gloves for chainsaw operations; and respiratory protection, hearing protection, and machine-specific PPE for FTI processing equipment operations.

Worker Health and Welfare

The contractor shall describe the measures it will implement to protect the general health and welfare of its workforce, including: access to potable drinking water and adequate nutrition on site; provision of adequate sanitation facilities with gender-segregated toilets and handwashing stations — at all work sites and worker accommodation areas; access to first aid facilities and trained first aid personnel on each shift; arrangements for medical referral and evacuation of seriously injured or ill workers to the nearest health facility; and provisions for managing communicable disease risks including HIV/AIDS, malaria, and respiratory infections among the workforce, particularly in remote project areas with limited health infrastructure.



Emergency Preparedness and Response

The contractor shall prepare and maintain a site-specific Emergency Response Plan covering the procedures to be followed in the event of a serious workplace accident, fire, chemical spill, wildlife encounter, medical emergency, or other emergency situation at the work site. The Emergency Response Plan shall identify the emergency response roles and responsibilities of site staff; the location and content of emergency equipment (fire extinguishers, first aid kits, spill response materials); the emergency communication procedures and contact numbers for PIU, FDA, local health facilities, police, and fire services; evacuation routes and assembly points; and post-emergency reporting requirements.

PART G: LABOUR MANAGEMENT

Terms and Conditions of Employment

The contractor shall confirm that all workers engaged on the contract including direct employees, subcontractor workers, and workers sourced through intermediaries will receive written employment contracts or engagement letters in a language they understand before commencing work; be paid wages at or above the national minimum wage established under Liberia's Decent Work Act (2015); receive all statutory entitlements including rest periods, annual leave, and public holidays; and not be subject to unauthorized wage deductions, recruitment fees, or withholding of wages. The contractor shall maintain complete and accurate wage payment records for all workers and make these available to the PIU for audit upon request.

Child Labor and Forced Labor Prevention

The contractor shall confirm its zero-tolerance position on child labor and forced labor and describe the specific measures it will implement to prevent these practices across its workforce and supply chain. These shall include age verification for all workers appearing to be under 18 years of age before they are engaged; prohibition on engagement of workers below the minimum working age of 16 years under any circumstances; restriction of workers between 16 and 18 years from hazardous activities; and confirmation that no worker is subject to debt bondage, withholding of identity documents, forced overtime, or any other form of compulsion.

Worker Grievance Mechanism

The contractor shall establish and maintain a site-level worker grievance mechanism that enables all workers regardless of employment status, gender, or nationality to raise labor-related concerns in a safe and confidential manner without fear of retaliation. The contractor shall describe the channels available for workers to submit grievances (including a designated grievance focal point, a complaint box, and, where available, a telephone or mobile money-based reporting option); the timelines for acknowledging and resolving grievances; the anti-retaliation protections in place; and the linkage between the contractor's worker grievance mechanism and the project-level GM maintained by the PIU. All workers shall be informed of the worker grievance mechanism at the time of engagement and periodically during implementation through toolbox talks and site notice boards.

PART H: TRAINING AND CAPACITY BUILDING

ESHS Induction Training

The contractor shall confirm that all workers including subcontractor workers and workers sourced through intermediaries will receive ESHS induction training before commencing work on site. The induction training shall cover: the key environmental and social risks associated with the contracted



works and the mitigation measures in place; the site-specific OHS rules, emergency procedures, and PPE requirements; the Code of Conduct and the consequences of violations; the worker grievance mechanism and how to access it; and the prohibition on GBV, SEA, child labor, wildlife hunting, and illegal logging. The induction training shall be delivered in the workers' primary language by the ESHS Manager or a qualified trainer and shall be documented with attendance records and acknowledgement forms signed by each worker.

Ongoing ESHS Training

Beyond initial induction, the contractor shall deliver regular ESHS refresher training and toolbox talks throughout the contract period. Toolbox talks brief (15–30 minute) safety briefings conducted before the start of each working day or each new work activity shall cover the specific hazards and ESHS requirements relevant to that day's or week's activities. Records of all toolbox talks, including topics covered, date, trainer name, and worker attendance, shall be maintained by the ESHS Manager. Refresher training on the Code of Conduct, GBV/SEA prevention, and labor rights shall be conducted at least every six months.

PART I: MONITORING, REPORTING, AND CORRECTIVE ACTION

Internal ESHS Monitoring

The contractor's ESHS Manager shall conduct regular internal monitoring of C-ESMP implementation throughout the contract period. This shall include daily site inspections to verify compliance with OHS, environmental, and social mitigation measures; weekly ESHS compliance checklists covering all major C-ESMP requirements; monthly ESHS performance reviews conducted by the ESHS Manager and senior site management; and quarterly comprehensive internal ESHS audits covering all elements of the C-ESMP. The results of all internal monitoring activities shall be documented and maintained by the ESHS Manager in a site ESHS log, available to the PIU and World Bank supervision teams upon request.

PIU Oversight Monitoring

The PIU Environmental and Social Specialists shall conduct periodic oversight monitoring of contractor ESHS performance through a combination of scheduled and unannounced site visits. The frequency of PIU site visits shall be proportionate to the risk category and scale of the contract at least monthly for high-risk civil works sites and at least quarterly for moderate-risk sites. PIU monitoring visits shall result in written monitoring reports, shared with the contractor, that document compliance status, issues identified, and corrective actions required. The contractor shall respond to PIU monitoring reports in writing within five working days, confirming the corrective actions it has taken or will take to address identified issues.

Incident Reporting

The contractor shall establish a clear incident reporting procedure covering all categories of ESHS incidents on site, including OHS accidents and near-misses, environmental contamination events, community health and safety incidents, GBV and SEA incidents, child labor findings, and community complaints. All incidents shall be recorded in the site ESHS incident log immediately upon occurrence. Serious incidents defined as fatalities, serious injuries requiring hospitalization, significant environmental damage, GBV/SEA cases, and child labor findings shall be reported to the PIU verbally within 24 hours and in a written incident report within 48 hours of occurrence. The PIU shall report all serious incidents to the World Bank in accordance with the ESCP.

Monthly ESHS Reporting



The contractor shall submit a brief monthly ESHS progress report to the PIU covering: the number of workers on site by category and gender; OHS performance data including lost-time injuries, near-misses, and incident frequency rates; the status of EPA permit compliance; key environmental and social issues identified during internal monitoring and the corrective actions taken; the status of community engagement activities and grievances received and resolved through the contractor's GM channel; and the status of Code of Conduct training and compliance. Monthly ESHS reports shall be submitted within five working days of the end of each calendar month.

PART J: CONTRACT COMPLETION AND SITE RESTORATION

Demobilization and Site Clearance

The contractor shall describe its plan for demobilizing from the work site upon completion of the contract, including: removal of all construction equipment, temporary structures, and materials from the site; proper disposal of all waste generated during demobilization; removal of worker accommodation facilities and restoration of those areas; and decommissioning and safe disposal or removal of any fuel, chemical, or hazardous material storage systems.

Site Rehabilitation and Restoration

The contractor shall describe the measures it will implement to rehabilitate and restore all areas disturbed by the contracted works to a condition at least equivalent to their pre-works state or, where the works have resulted in permanent land use change consistent with the project design, to a safe, stable, and ecologically functional condition. This shall include revegetation of all disturbed areas not covered by permanent works using locally appropriate native species; restoration of topsoil and surface drainage patterns; reinstatement of any community access paths or boundaries disturbed during works; and remediation of any soil or water contamination caused by construction activities.

Completion ESHS Audit

Upon completion of the contracted works, the contractor shall commission and submit to the PIU a completion ESHS audit report prepared by an independent ESHS auditor acceptable to the PIU confirming that: all C-ESMP mitigation measures have been implemented as required; all identified incidents have been fully resolved and closed out; the site has been fully rehabilitated and restored to an acceptable condition; all community grievances have been resolved and closed; all workers have received final wage settlements and contract close-out documentation; and no outstanding ESHS obligations remain under the contract.

PART K: APPENDICES

The following appendices shall be attached to the completed C-ESMP submitted by the contractor for PIU clearance.

- site map or sketch showing the work area, surrounding land uses, sensitive receptors, watercourses, and ecologically sensitive features, with GPS coordinates for key site boundaries and sensitive locations.
- copies of all applicable Liberia EPA permits, Certificates of Approval, and any other regulatory authorizations obtained for the contracted works.
- contractor's signed Environmental and Social Policy and Code of Conduct, together with the standard worker Code of Conduct acknowledgement form to be signed by all workers before commencing work.



- contractor's Emergency Response Plan, including emergency contact numbers, evacuation routes, assembly points, and emergency equipment inventory.
- Labor Influx Management Plan, where required for contracts involving significant in-migration of workers.
- Chance Find Procedure for physical cultural heritage, specifying the steps to be followed upon discovery of previously unknown cultural heritage or archaeological materials.
- contractor's OHS risk assessment and activity-specific OHS measures, including PPE requirements by work activity and the site-specific OHS rules to be enforced.
- contractor's waste management plan, including waste categorization, on-site segregation and storage arrangements, designated disposal sites and methods, and contracted waste disposal service provider details.
- Where applicable, additional appendices shall include the water quality protection plan for works near Piso Lake or other sensitive water bodies; the asbestos management plan for works involving removal of asbestos-containing materials; and the slope stabilization and erosion control plan for works on steep terrain.



Appendix 22: Sample Traffic Management Plan

In general, a Traffic Management Plan is required for all projects that could have an impact on:

- **MOBILITY** - including interruptions to pedestrians, cyclists and vehicular traffic; and
- **COMMUNITY** - including interruptions to surrounding businesses and residents from construction activity and worker parking needs.

The objective of this TMP is to provide safe passage for pedestrians, cyclists and vehicular traffic along the proposed intervention sites

General Traffic Management Measures

Based on the proposed activities described in the ESMF, civil work activities may involve enabling infrastructure for wood processing (road improvements, facility construction); nature-based tourism including ecotourism PPP investment at both Gola Forest National Park and Piso Lake Multiple Use Reserve construction; material transport for nurseries and restoration etc. To do this safely, it will necessitate cordoning off of the ROW, around the construction zone and may disrupt traffic. In the following subsections, an overview of Traffic management requirements and plans are succinctly iterated.

Components of the Traffic Management Plan

The proposed TMP for the construction work should to a minimum address the following:

The Contractor should designate a TMP Supervisor who will oversee traffic management along major roads within the project corridors.

Traffic Management Plan for the project will address the following:

. Traffic Impact Assessment

- Estimated daily vehicle movements by type (light vehicles, heavy trucks, motorcycles)
- Existing road condition and capacity in project area
- Sensitive receptors along transport routes (schools, markets, health clinics, pedestrian crossings)

Traffic Control Measures

- Maximum vehicle speed: 30 km/hr in communities; 50 km/hr on project roads
- No heavy vehicle movement between 22:00 and 06:00 in community areas
- Warning signs and reflective markers at all active works zones
- Flagmen/traffic marshals at road sections where two-way flow is restricted by works
- Designated pedestrian crossings with signage at all community entry/exit points
- Physical barriers (cones, barriers) protecting active work zones from traffic

Vehicle and Driver Standards

- All project vehicles roadworthy; annual vehicle inspection certificate required
- All drivers hold valid Liberian license for vehicle category operated
- No driving under the influence; zero-tolerance policy enforced
- All vehicles equipped with: functional lights, horn, seatbelts, first aid kit, fire extinguisher



- Journey management plan for remote field operations: departure/arrival registration; check-in schedule

Material Transport

- Overloaded vehicles prohibited; loads secured and covered to prevent spillage
 - Hazardous material transport: segregated from passengers; MSDS carried; emergency response equipment on vehicle
 - Timber transport: chainsaw certification and FDA transport permits required for all timber movements
- a) **Safety Signage:** Safety signage will be put up along all major roads within the project corridors. This would inform motorists and other road users of the ongoing construction works within the area. Caution is most required by motorists and cyclists who transverse the project areas.
 - b) **Diversion Signage:** Diversion signage will be erected at sensitive places where diversions will exist from the project implementation.
 - c) **Communication:** The Contractor, with support from the FDA/PIU, will prepare a communication protocol which will be shared with the communities within the respective zones. The communication protocol will provide a stepwise approach to informing residents about traffic plan alterations 48hrs before they are implemented. Communication with communities will be directly facilitated by the Contractor's Community Liaison Officer and respective Community Associations. Additionally, communications should be made with the PCU, traffic agencies and Community associations a week prior to notifying the general populace.
 - d) **Liaisons with Government Traffic Agencies.** The TMP will ensure liaisons with the traffic agencies. In situations where heavy traffic impacts are envisaged, the Contractor will liaise with the traffic agencies to ensure traffic coordination and mitigate adverse traffic impacts.

Construction Traffic Management

A lot of heavy-duty vehicles and machinery will be used during construction. These will mostly bring materials to site and/or evacuate spent materials from the site. If not properly managed, these heavy vehicles and machinery could constitute obstruction to diverted traffic. Therefore, among others:

- Movement of tipper trucks to and from the project area shall be controlled as much as possible by the positioned flagmen in collaboration with relevant traffic management authority.
- As much as possible movements of project vehicles will be timed to coincide with off peak periods of traffic.
- Strict speed limits shall be enforced on all truck drivers working on this project and non-compliance shall be addressed by the contractor, supervision engineer and FDA/PIU. Measures will be taken to educate the drivers during weekly pep talks.

Vehicles Breakdown and Accidents

Measures to avoid accidents on work sites, generally and particularly on construction sites should be adhered to. However, vehicle breakdowns could occur within the worksites and this could cause bottlenecks and snarls. Therefore, in the event of such an occurrence, there should be provision to immediately assist with evacuating such vehicles from traffic routes while tow vehicles will be contacted from the nearest point.



Traffic Control

To effectively manage traffic during the day, an assessment has been done on all the sites. The major traffic peak periods in the sites (during the working periods) that have serious traffic issues should be determined. There should be proper management of traffic at the determined peak/off peak periods and especially when there are mobilization and demobilization of machinery and heavy equipment on the site the following will be undertaken:

- Adequate number of well-trained flagmen should be deployed to manage the traffic situation.
- Mobilization and demobilization of heavy equipment should take place during off-peak traffic periods.
- Officers of the relevant traffic control agency should be coopted to coordinate traffic movement during mobilization and demobilization.
- The contractor should ensure that all construction activities are performed in accordance with the approved Traffic Management Plan.

Incident Reporting

- All road traffic incidents involving project vehicles reported to PIU within 24 hours
- Serious accidents involving community members reported to World Bank within 48 hours

Community Awareness

- Pre-construction community notification of traffic changes and heavy vehicle routes
- Community feedback mechanism for traffic-related complaints integrated into project GM



Appendix 23: Sample Chemical Storage Plan (CSP)

Activities: Nursery operations (, fertilizers); agroforestry matching grants (agrochemicals); nature-based tourism including ecotourism PPP investment at both Gola Forest National Park and Piso Lake Multiple Use Reserve and facility construction (paints, solvents, fuels); equipment maintenance (lubricants, oils).

Chemical Inventory For each chemical stored at any LiFE-P site, maintain a register including:

- Chemical name and active ingredient; supplier; UN number and hazard class
- Quantity stored (maximum at any one time); physical form (liquid, granule, powder)
- Material Safety Data Sheet (MSDS) location (on-site, accessible to all workers)

Storage Facility Requirements

- Dedicated chemical storage facility, separate from food storage, accommodation, and water sources
- Bunded floor capable of containing 110% of the largest single container volume
- Ventilated to prevent vapor accumulation; no ignition sources within 5 meters
- Locked at all times when unattended; access restricted to trained personnel
- Labeled "CHEMICAL STORAGE — AUTHORIZED PERSONNEL ONLY" in English and local language
- Fire extinguisher (dry powder, minimum 9 kg) located immediately outside storage facility
- Emergency spill kit (absorbent material, disposal bags, gloves, goggles) stored adjacent to facility
- Nearest water source at least 30 meters away; no storage within 50 meters of any watercourse

Chemical Handling Procedures

- Chemical handlers must receive training in safe handling, PPE use, spill response, and MSDS interpretation before working with chemicals
- PPE (chemical-resistant gloves, goggles, apron, respiratory protection) mandatory during mixing and application
- Chemicals to be mixed in bunded area only; no mixing near water sources
- Application shall follow label instructions and recommended rates; no off-label use
- Application prohibited within 30 meters of any watercourse or during rainfall events
- Empty containers: triple-rinsed; punctured (to prevent reuse); disposed per Annex C hazardous waste procedures

Spill Response

- Spill kit immediately available at storage facility and at application sites
- Spill response procedure posted on storage facility door in English and local language:
- Alert all persons in area; evacuate if large spill
- Don PPE before approaching spill
- Contain spill using absorbent material; prevent entry to drains or water
- Collect contaminated material in labeled waste containers
- Report to PIU Environmental Officer within 1 hour; document in incident log
- Dispose of contaminated material as hazardous waste per Annex C

Prohibited Chemicals The following chemicals are prohibited under LiFE-P, consistent with the WBG Exclusion List and international conventions:



- Chemicals classified as WHO Class Ia (Extremely Hazardous) or Ib (Highly Hazardous)
- Chemicals listed under the Stockholm Convention on Persistent Organic Pollutants
- Chemicals listed under the Rotterdam Convention requiring Prior Informed Consent
- Formaldehyde; asbestos-containing materials; lead-based paints; DDT Monitoring
- Monthly chemical storage inspection by site supervisor (checklist)
- Quarterly audit by PIU Environmental Officer
- Any spill or incident to be recorded in site incident log and reported to PIU



Appendix 24: Sample Asbestos Management Plan

The Asbestos Management Plan (AMP) provides the framework for identifying, managing, and safely disposing of asbestos-containing materials (ACMs) that may be encountered during rehabilitation and civil works activities under the Liberia Forest Economy Project (LiFE-P). It applies to all civil works involving existing structures including but not limited to the Forestry Training Institute (FTI) and Service Excellence Center (SEC) rehabilitation under Sub-component 3.2, ranger camp rehabilitation under Sub-component 2.3, CFMB office construction or renovation under Sub-component 2.1, and FDA regional office infrastructure works under Sub-component 1.2.

This AMP is prepared in accordance with the World Bank Environmental and Social Standard 2 (ESS2 Labor and Working Conditions), ESS4 (Community Health and Safety), and relevant international good practice, including the IFC EHS General Guidelines on Occupational Health and Safety and WHO guidance on asbestos elimination. It shall be read in conjunction with the project LMP, ESMF, and site-specific C-ESMPs for all civil works contracts.

Asbestos Risk Assessment and Pre-Works Survey

Mandatory Pre-Works Asbestos Survey

An asbestos survey shall be conducted by a qualified person at all existing structures subject to rehabilitation before any intrusive or demolition work commences. No rehabilitation works shall commence on existing structures until the asbestos survey report has been reviewed and cleared by the PIU Environmental Specialist.

The survey shall follow a two-stage approach:

Survey Type	When Required	Purpose
Management Survey	Before any works commence on existing occupied structures	Identifies the location, type, and condition of ACMs present; assesses risk of fibre release under normal building use; informs the AMP
Refurbishment and Demolition Survey	Before any intrusive, refurbishment, or demolition works	Identifies all ACMs in areas to be disturbed; mandatory before any structural works begin

Survey Scope

The asbestos survey shall cover, at minimum, the following building elements and materials:

Building Element	Common ACM Types
Roof coverings	Corrugated asbestos cement sheets
Ceiling panels	Asbestos insulation board, textured coatings
Floor coverings	Vinyl floor tiles with asbestos backing
Wall cladding	Asbestos cement flat sheets
Pipe lagging and insulation	Asbestos rope, lagging, and insulation wrap



Boiler and plant rooms	Asbestos gaskets, insulation panels
Fire protection materials	Asbestos fire door linings, vermiculite insulation
Gutters and downpipes	Asbestos cement drainage products

Sampling and Laboratory Analysis

Where suspect materials are identified, bulk samples shall be collected by the qualified surveyor and submitted to an accredited laboratory for analysis by polarized light microscopy (PLM) or transmission electron microscopy (TEM). The laboratory shall provide a written report identifying the asbestos type chrysotile (white), amosite (brown), or crocidolite (blue) and the percentage content. All three types shall be managed as hazardous regardless of percentage content.

Asbestos Register

The PIU Environmental Specialist shall maintain an Asbestos Register for each civil works site documenting:

- Location and description of all identified or presumed ACMs
- Type and condition of ACMs (intact/friable)
- Risk assessment rating for each ACM location
- Actions taken (manage in place / remove)
- Dates of inspection and removal
- Disposal certificates

The Asbestos Register shall be updated after every inspection or works event involving ACMs and made available to all relevant contractors and supervisors before works commence.

ACM Classification and Risk Rating

ACM Condition	Fibre Release Risk	Required Action
Intact and undisturbed -good condition, no visible damage or deterioration	LOW	Manage in place; label and monitor; do not disturb; inspect every 6 months
Intact but potentially at risk -minor surface damage, located in area of planned works	MEDIUM	Assess for removal before works commence; encapsulation may be considered if removal is not immediately feasible
Friable or damaged crumbling, broken, or deteriorated material releasing or likely to release fibres	HIGH	Immediate removal by licensed asbestos removal contractor before any other works proceed
Disturbed during works (chance find)	HIGH — EMERGENCY	Stop all works immediately; implement emergency response procedure

Asbestos Management Options

Management in Place (Encapsulation)

Where ACMs are in good condition and will not be disturbed by planned rehabilitation works, management in place may be appropriate. Requirements include:



- Label all encapsulated ACM locations with standardized asbestos warning signs
- Apply encapsulant coating where surface degradation is beginning
- Record location in Asbestos Register
- Inspect every six months and after any works in the vicinity
- Inform all subsequent contractors and workers of ACM locations before works commence

Removal

Removal is required where ACMs are friable, damaged, or located in areas that will be disturbed by planned rehabilitation works. All asbestos removal shall be undertaken only by a licensed asbestos removal contractor. Key requirements are detailed below.

Asbestos Removal Procedures

Contractor Requirements

All asbestos removal works shall be undertaken by a licensed asbestos removal contractor with demonstrated experience in ACM removal in tropical construction contexts. The contractor shall provide, before works commence:

- Evidence of relevant licensing or certification for asbestos removal
- Asbestos Removal Work Plan specific to the site
- List of all workers engaged in removal with proof of asbestos awareness training
- PPE inventory confirming availability of all required protective equipment
- Waste disposal plan including identification of EPA-approved disposal facility

The PIU Environmental Specialist shall verify all contractor documentation before issuing written clearance for removal works to proceed.

Work Area Preparation and Isolation

Requirement	Standard
Exclusion zone	Establish clearly demarcated exclusion zone around removal area minimum 10 meters from removal point for outdoor works; full room isolation for indoor works
Physical barriers	Install physical barriers hoarding, sheeting, or tape with standardized warning signs at all access points
Negative pressure enclosure	Required for removal of friable ACMs or works in enclosed spaces maintain negative air pressure using HEPA-filtered air extraction units
Community notification	Notify all workers and community members within 50 meters of the exclusion zone 48 hours before removal commences; advise on health risks and restriction of access
Access control	Restrict access to the removal area to licensed removal workers only during works
Wetting	Wet all ACMs thoroughly with amended water (water with surfactant) before and during removal to suppress fibre release — do not dry-cut or dry-break ACMs under any circumstances



Personal Protective Equipment (PPE)

All workers engaged in asbestos removal shall be provided with the following PPE:

PPE Item	Specification
Respiratory protection	Minimum FFP3 disposable respirator or half-face respirator with P3 filter; full-face powered air-purifying respirator (PAPR) for high-fibre-release activities
Disposable coveralls	Type 5/6 disposable coveralls with hood to be disposed of as asbestos waste after each shift
Gloves	Disposable nitrile gloves worn under work gloves
Footwear	Disposable boot covers over work boots; or dedicated site boots cleaned before leaving the exclusion zone
Eye protection	Safety goggles where RPE does not provide full face coverage

Workers shall receive training on correct donning, doffing, and disposal of PPE before commencing any removal works.

Removal Techniques

ACM Type	Required Technique
Asbestos cement sheets (roofing, cladding)	Remove whole sheets intact where possible do not break, drill, or cut; wet thoroughly before removal; lower sheets to ground level using rope do not drop
Floor tiles	Carefully lift intact tiles using hand tools; avoid fracturing; wet before removal
Pipe lagging and insulation	Remove in sections using hand tools; wet thoroughly; double-bag immediately
Friable materials	Work under full negative pressure enclosure with PAPR; wet continuously; remove by hand in small sections; double-bag immediately

Decontamination

A decontamination unit (DCU) comprising a dirty area, shower, and clean area shall be established at the exclusion zone boundary for all asbestos removal works. All workers shall pass through the full decontamination procedure before leaving the exclusion zone:

- Remove disposable coveralls and outer gloves in dirty area bag immediately as asbestos waste
- Shower with soap and water including hair washing
- Don clean clothing in clean area
- Remove respirator last clean facepiece with damp cloth; do not dry-brush

Asbestos Waste Handling, Packaging, and Disposal



Packaging Requirements

Requirement	Standard
Double-bagging	All ACM waste shall be double-bagged in heavy-duty polythene bags (minimum 200 micron) -inner bag sealed within the exclusion zone; outer bag applied in the decontamination unit
Labelling	All bags shall be labelled with standardized asbestos warning label: "DANGER ASBESTOS WASTE - DO NOT OPEN"
Rigid containers	Friable ACM waste and contaminated PPE shall be placed in rigid, sealed containers with asbestos warning labelling
Contaminated materials	All materials contaminated with asbestos -PPE, plastic sheeting, wipes — shall be packaged and disposed of as asbestos waste

Transportation

- Asbestos waste shall be transported in a sealed, dedicated vehicle not mixed with general construction waste
- The transport vehicle shall display asbestos hazard placards during transport
- A waste transfer note shall accompany each transport movement documenting the quantity, type, and destination of asbestos waste
- All waste transfer notes shall be retained by the PIU Environmental Specialist

Disposal

- Asbestos waste shall be disposed of at an EPA-authorized hazardous waste disposal facility
- In the absence of an EPA-authorized facility within Liberia, the PIU Environmental Specialist shall engage EPA to identify the approved disposal method which may include designated secure landfill burial at depth with EPA oversight
- Asbestos waste shall never be disposed of in general construction waste skips, open dumps, or community landfills
- Disposal certificates from the receiving facility shall be obtained and filed in the Asbestos Register



Appendix 25: Relevant Licences

The table below provides a list of statutory requirements by the EPA and FDA

S/N	List of statutory approvals or licenses to be obtained	Description	Responsible Agency
Operator authorization			
Studies/surveys/reports on environmental and social studies and archaeology (e.g. environmental assessments, environmental impact assessments, resettlement action plan etc.)			
1	EIA license/permit	Section 6 of the EPML (2003) requires an ESIA license or permit for the commencement of projects that have the potential to impact the environment. An ESIA is required for some specific types of projects (defined in Annex I of the EPML), while the need for an ESIA for other projects may be determined on a case-by-case basis. Permit will be obtained prior to project commencement of civil works.	Environmental Protection Agency (EPA)
Forestry Development Authority (FDA) permits and approvals for forestry and forest-related activities in Liberia, pursuant to the National Forestry Reform Law (2006)			
2	Forest Management Contract (FMC)	Longer and larger contracts awarded for forest land areas 50,000-400,000 hectares that do not include private land and are generally for a period of 25 years	FDA
3	Timber Sale Contract (TSC)	Logging contracts issued for forest land areas smaller than or equal to 5000 hectares that do not include private land and are meant for a period of 3 years	FDA
4	Forest Use Permit (FUP)	small-scale licenses for logging, research, non-timber forest products (NTFPs) extraction and use or other uses with no details on duration, size or ownership type	FDA
5	Community Forest Management Agreement (CFMA)	licenses issued to communities for purposes of community-based forest management areas smaller than 50,000 hectares, and are regulated by the Community Rights Law with respect to forest lands (CRL) and its regulations	FDA
6	Private Use Permits (PUPs)	licenses issued to private landowners (individuals, groups, communities) to extract wood for which no specific regulation exists and where no information is available as to size, duration and guiding principles	FDA
7	Forest Management Plan (FMP) Approval	FDA's approval of a concessionaire's long-term plan for sustainable management of a forest concession area, required as a prerequisite for commercial harvesting under an FMC.	FDA
6	Annual Operations Plan (AOP) Approval	FDA's annual approval of a concessionaire's short-term harvesting and operational program, which is a mandatory precondition for obtaining an Annual Harvesting Certificate.	FDA
8	Timber Transport Permit/Waybill Authorization	FDA-issued document authorizing and tracking the movement of logs and timber from the forest concession to a processing facility, log yard, or point of export via the LiberTrace chain-of-custody system.	FDA
9	Log Tagging and Chain-of-Custody Registration	FDA's registration and physical tagging of harvested logs in the LiberTrace system to ensure full traceability from stump to export and prevent commingling with illegally	FDA



			sourced timber.	
10	Sawmill/Wood Processing Facility Registration/License		FDA's annual registration and licensing of mechanized processing facilities, classifying facilities by annual processing volume and authorizing their legal operation.	FDA
11	Export Permit/Log Authorization	Export	FDA-issued permit authorizing the export of timber or forest products, conditional on LiberTrace compliance, payment of all royalties and taxes, a valid Annual Harvesting Certificate, and Tax Clearance Certificate from the Liberia Revenue Authority.	FDA
12	Non-Timber Forest Product (NTFP) Permit	Product	FDA-issued license authorizing the commercial harvesting, transport, and export of non-timber forest products, with waybill requirements for all NTFP movements and specific conditions for export shipments.	FDA
13	Protected Species Authorization		FDA-issued authorization permitting activities including research, handling, or limited use, involving species protected under Liberia's wildlife and forestry legislation, issued on a case-by-case basis with conditions.	FDA



ANNEXES FOR LMP



Annex 1: ESS2 Key Requirements and Core Elements and Liberia's ESRM system strengths and gaps

ESS2 Key Requirements and Core Elements for Effective Implementation and Liberia ESRM System Gaps

ESS2 Requirement / Dimension	Liberia Legislation & System Strengths	Gaps / Misalignments with ESS2
1. Legal Framework Consistency with ESS2	The Constitution and Decent Work Act (DWA, 2015) provide a foundational legal basis for labor rights, including nondiscrimination, freedom of association (for private sector), prohibition of forced labor, and OHS obligations. Liberia has ratified key ILO conventions (C87, C98, C100).	Public-sector workers governed by the Civil Service Agency Act are excluded from DWA protections (union rights, collective bargaining). No national SEA/SH policy or Codes of Conduct. Child labor laws allow light work from age 13-misaligned with ESS2 minimum age 14. Weak definitions and enforcement of hazardous work prohibitions.
2. Institutional Mandates & Capacity	Ministry of Labor (MoL) and EPA have inspection mandates; OHS Department conducts compliance reviews in medium/high-risk establishments. Some donor-supported capacity building underway (WB, ILO).	Severe resource constraints—understaffing, underfunding, limited technical and SEA/SH expertise. Overlaps and unclear mandates between MoL, EPA, and local authorities. Rural and informal sectors largely unregulated.
3. Labor Management Procedures (LMPs)	General labor laws exist to guide worker rights and employer obligations.	No legal requirement for project-specific LMPs; national systems do not provide practical templates or enforcement mechanisms.
4. Information & Documentation of Employment Terms	Written contracts required for formal employees; legal provisions exist for setting employment terms.	Casual workers are typically not provided with written terms—they participate only in daily sign-in arrangements. No universal requirement for clear communication of rights and obligations.
5. Occupational Health and Safety (OHS)	OHS is legally mandated under DWA; MoL OHS Department has inspection authority.	Weak and irregular enforcement; lack of routine safety audits and medical checks. Limited capacity to enforce in informal and rural sectors.



ESS2 Requirement / Dimension	Liberia Legislation & System Strengths	Gaps / Misalignments with ESS2
6. Non-discrimination & Equal Opportunity	DWA prohibits discrimination and promotes equal opportunity in employment.	Enforcement is inconsistent, particularly in informal sectors. Public-sector workers lack union and bargaining rights. SEA/SH prevention and response not operationalized in law or regulations.
7. Protection of Vulnerable Workers	Some policy acknowledgement in development projects (IFI-dependent).	No explicit national legal provisions on special protections for vulnerable groups (women, persons with disabilities, migrants). National frameworks treat all workers uniformly, contrary to ESS2 requirements for tailored protection.
8. Child Labor Requirements	Children's Act (2011) prohibits hazardous work for persons under 18.	Light work allowed from 13 years; lack of clear hazardous work definitions; enforcement weak. No systematic risk assessments for workers under 18.
9. Forced Labor Prohibition	Forced labor is explicitly prohibited under DWA; aligned with ESS2.	Implementation challenges persist in informal sectors, though no major legal gaps.
10. Primary Supply Chain Labor Risks	General labor protections exist in law (DWA).	No requirement to assess labor risks (child labor, forced labor, OHS) in primary suppliers-gap with ESS2.
11. Worker Grievance Mechanisms	Workers have access to labor courts; some GMs exist in donor-funded projects.	Labor courts are centralized, costly, and inaccessible for many (especially rural workers). Project-specific GMs are inconsistent, often lack confidentiality, and rarely SEA/SH-capable. No whistleblower protections.
12. Operational Performance & Enforcement	Existing frameworks allow for regular inspections in formal settings; donor support is gradually strengthening institutional capacity.	Limited coordination between agencies; low coverage in high-risk or informal sectors; weak SEA/SH response systems; limited trained personnel in OHS, grievance handling, and E&S risk management.





Annex 2: Code of Conduct for Contracted Companies

This Code of Conduct for Contracted Companies on basic labour conditions and human rights (hereafter referred to as “Code”) represents the commitment of [Company name] to fundamental standards that make [Company name] the right place to work.

[Company name] prides its employees as its most vital asset. The individual and collective contributions of [Company name] people at all levels are essential to the success of the company.

In recognition of this, [Company name] has developed policies and practices designed to ensure that employees enjoy the protection afforded by the concepts set forth in this Code.

[Company name] is committed to the protection and advancement of human rights in its operations, and the concepts in this Code are generally derived from [Company name] policies and practices described in the Labour Management Procedure (LMP) prepared for the project. These reflect labour and human rights standards from the International Labour Organization, the Universal Declaration of Human Rights, Liberian Labor Laws and the World Bank Environmental and Social Standard 2 (ESS2) on Labour and Working Conditions.

Non-Discrimination and Equal Opportunity

It is the policy of [Company name] to attract and retain the best qualified people available without regard to race, color, religion, national origin, gender, sexual orientation, gender identity, age, veteran status, physical or mental disability etc. Our non-discrimination policy applies to applicants as well as employees, and covers all terms and conditions of employment, including recruiting, hiring, transfers, promotions, terminations and total compensation benefits. Discrimination or harassment based on any of the above factors is prohibited, as is retaliation against a person who has made a complaint or given information regarding possible violations of this policy.

Prevention of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

[Company name] upholds a zero-tolerance policy on behaviors that constitute sexual exploitation, abuse, and sexual harassment. [Company name] will ensure that all employees are informed about this policy, that reporting is enabled through a grievance mechanism, whistleblowers are given full protection, and that disciplinary action is enforced in case of misconduct.

Freedom of Association

[Company name] recognizes and respects the legal rights of the employee to join or to refrain from joining any lawful organization of their own choosing. [Company name] is committed to complying with laws pertaining to freedom of association, privacy and collective bargaining. The company's established belief is that the interests of [Company name] and its employees and the employees are best served through a favourable, collective work environment, with direct communication between employees and management.

Occupational, Health and Safety (OHS) and Environmental Protection



[Company name] is committed to as far as reasonably possible, providing services and products in a safe and responsible manner with due care to employees, customers, contractors, visitors and the general public. As a minimum requirement, the company shall meet their specific statutory legal, health, safety, security and environmental obligations. The goals across the organization are synonymous with:

- Pursuit of no harm to people.
- Pursuit of protection of health, safety and security is managed with the same high regard as all other critical business activities.
- Pursuit of protection and preservation of the environment is managed with the same high regard as all other critical business activities.

As such, a systematic approach to OHS, Environmental Protections adopted to ensure compliance. In addition to any minimum legislative requirements, measurements and appraisals are taken on company performance, the objective of which is to ensure continuous improvement throughout the company.

Providing employees with a safe and healthy working environment, protecting the environment wherever we conduct business and striving for excellence in safety, health and environmental stewardship.

Work Environment and Compensation

[Company name] is committed to promoting a work environment that fosters communication, productivity, creativity, teamwork, and employee engagement. As a company, we seek to provide employees with compensation and benefits that are fair and equitable for the type of work and geographic location (local market) where the work is being performed, and competitive with other world-class companies.

Hours of Work and Work Scheduling

[Company name] establishes work shifts and schedules work as appropriate to meet business needs and to comply with applicable laws and/or collective bargaining agreements/employees handbook and codes of practice.

Child Labour

By signing this Code of Conduct, [Company name] confirms that it has informed itself of:

- Risks related to child labour in the economic sector in which it is active.
- Legal standards for the work of children who have reached the minimum age for light work (14 years old) and who have reached the minimum age for employment (15 years old).
- Legal standards relating to the prohibition of hazardous work for children below 18 years
- Legal standards related to the prohibition of forced labour and trafficking.

To minimize the risk of child labour [Company name] will:

- Respect the minimum age for work in accordance with the projects Labor Management Procedure.
- Carry out a verification of the age of the workers.
- Keep a register of workers with names, dates of birth or their apparent ages.
- Establish a policy and code of good conduct for the protection of children at work.
- Establish a plan to monitor that no child is involved in work that can be defined as child labour because it is exploitative in nature or hazardous.
- Establish a list with identifying information, such as name and age for workers under 18 years.



- Informed from the Liberia Hazardous Child Labour Activity Framework, establish a workplace list that defines the tasks prohibited for children under 18 years.
- Appoint a person responsible for monitoring working conditions for children under 18 years.
- Establish an occupational health and safety policy and plan that defines the procedures for replacing a sick or injured worker that ensures that children do not replace adults for dangerous tasks.
- Develop an awareness and training schedule given the various work risks, including child labour. This training must cover the working conditions of young workers.
- Record and report all suspected cases of suspected child labour in connection to or as unintended impact of project activities.
- Seek informed and written consent from parents or primary care givers before engaging a child above the legal age for work, in work.
- Only let work of a child begin after an appropriate risk assessment has been done at the workplace prior .
- Only let the work of a child begin after a medical practitioner has certified that the young person is in good health and is medically fit for work.

Slavery, Human Trafficking, Forced Labor

Employment and work for *[Company name]* shall be voluntary, and the terms of employment must be communicated to workers in writing and comply with applicable laws and regulations. All work or service exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily is prohibited. Children can be considered coerced / forced to work, even if they have given their consent, depending on the circumstances under which the child was recruited.

[Company name] informs its employees, contractors and vendors about this Code. We encourage our contractors and vendors to adopt and enforce Codes with similar contents covered. Employees who believe there may have been a violation of this Code report it through confidentially established channels. *[Company name]* may conduct assessments, as needed, to measure compliance. *[Company name]* will periodically review this Code to determine whether revisions are appropriate.

The purpose of this Code is to maintain zero tolerance for exploitative and hazardous child labour, slavery, human trafficking, forced labour. The policy on human trafficking applies to all its employees as well as to any persons whose functions are related to *[Company name]*.

Employees of *[Company name]* and Contractors whose functions relate to *[Company name]* operations shall not:

- Use forced labour in the performance of any work,
- Engage in human trafficking,
- Engage in commercial sex acts,
- Deny employees access to his/her immigration documents such as passports, driving license, etc.,
- Use misleading recruitment practices,
- Use recruiters that do not comply with Labour Laws of Liberia or the law of the country/place where the recruitment takes place,
- Fail to provide a flight ticket to destination or country of permanent residence at the end of contract/employment,
- In the event of violation of this policy, *[Company name]* may take action against the violating employee or contractor to include termination of contract.

Expectations For Our Sub-contractors / Suppliers/ Workers



[Company name] is committed to the highest standards of ethical and business conduct as it relates to the procurement of goods and services and for doing work. Our relationships with our subcontractors and / or suppliers, including our consultants and contract labour, are defined by contracts, which are based on lawful, ethical, fair, and efficient practices.

As a company, we have outlined our expectations for basic code of conduct, together with our Statement of Corporate Social Responsibility, and it is a must for all our subcontractors/suppliers and workers to adhere to these expectations.

Having read, and discussed ineptly, the above *[Company name]* signs this Code of Conduct on the *[Date: DD/MM/YYYY]*,

I *[Name]*, as an employee or contractor of *[Company name]*, hereby certify that I have read, noted and adhere to abide by the Code of Conduct of *[Company name]*

Code of Conduct *[Date: DD/MM/YYYY]*



Annex 3: Code of Conduct for Employees

Introduction

At *[Company Name]* our employees are our most valuable asset. This Code of Conduct outlines your rights as an employee and the responsibilities you commit to when working with us. By signing this document, you acknowledge and uphold these principles to promote a respectful, fair, and safe workplace.

Your Rights as an Employee

Non-Discrimination & Equal Opportunity

You have the right to work in an environment free from discrimination or harassment. Employment decisions—including hiring, promotions, and compensation—are based on merit, regardless of race, gender, age, disability, or other personal characteristics. If you experience discrimination, you have the right to report it confidentially.

Freedom of Association

You have the legal right to join or refrain from joining any trade union or employee association of your choice. The company respects this right and ensures a workplace where your voice is heard.

Fair Compensation & Work Conditions

You are entitled to fair pay, reasonable working hours, and a safe, healthy work environment. Your wages and benefits as communicated in your contract, comply with national labor laws and industry standards. You have a right to ask questions about your compensation and work conditions and raise concerns without fear of retaliation against you.

Safe & Healthy Workplace

Your health and safety matter. The company is committed to preventing workplace hazards, providing proper training, and ensuring a clean working environment. If you notice unsafe conditions, you have the right to report them.

Protection Against Forced Labor & Child Labor

[Company Name] strictly prohibits forced labor, child labor, and human trafficking. If you suspect violations related to these, report them immediately through established company, project, national or World Bank channels.

Your Responsibilities as an Employee

As an employee of *[Company Name]* your professional and private behaviour reflects on the company image. As such employees are expected to act in a way so as to uphold the company's good reputation and standing in the community/society where it operates. As an employee, you are therefore expected to show:

Respect for Colleagues & Workplace Ethics

Treat colleagues, customers, and partners with respect and professionalism. Discrimination, harassment, and bullying are unacceptable. Be mindful of your language, actions, and attitudes toward others.

Commitment to Workplace Safety

Follow all the health and safety guidelines provided to you by the company. Use protective equipment when required and report any hazards or accidents promptly.



Zero Tolerance for Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

Sexual exploitation and abuse and sexual harassment are strictly prohibited in the workplace as outside of the workplace. Employees must avoid such inappropriate behavior at all times and should report suspected incidents through the confidential grievance mechanism of the company, the grievance mechanism of the project, the World Bank grievance services, or a national reporting mechanism (such as by the Ministry of Labor) whichever channel the employee is the most comfortable with.

Environmental Responsibility

Be mindful of workplace sustainability. Reduce waste, use company resources responsibly, and follow environmental safety protocols.

Workplace Integrity & Confidentiality

Maintain honesty and transparency in your work. Do not misuse company information or engage in dishonest practices. If handling sensitive data, ensure confidentiality and follow company policies.

Commitment to Ethical Employment Practices

Ensure that all work performed under company operations aligns with labor laws. Do not engage in fraudulent activities, forced labor, or unethical recruitment practices.

Reporting Concerns

If you witness violations of this Code, report them through company-designated confidential channels. The company ensures whistleblower protection, meaning reports are handled securely, and employees will not face retaliation. Should you have any concerns regarding workplace grievance mechanism, you are free to choose to report to any other mechanism, such as the grievance mechanism of the project, a national reporting mechanism or the World Bank grievance services⁴³, whichever channel you feel the most comfortable with.

Acknowledgment & Agreement

By signing below, I acknowledge that I have read and understood this Code of Conduct for Employees. I agree to uphold these principles in my role at [Company Name].

Employee signature:

Employee name:

Date: [DD/MM/YYYY]

⁴³ <https://wbgcmsprod.microsoftcrmportals.com/en-US/anonymous-users/int-fraud-management/create-new-complaint/>



Annex 4: Parental authorization for child work between 14 and 15 years for light work.

The work of a child under the age of 18 is done with parental authorization.

Submit this application, completed and signed, to the employer / the person who organizes the work of the child before the start of the work.

Legal information:

Children from the age of 14 can undertake light work and engage in economic activities such as for example in the family business, and under certain conditions, e.g., to earn a little pocket money outside of school hours or during school holidays but cannot be employed under a labor contract.

Light work should be undertaken under the supervision of an adult, for the purposes of education and social integration of the child.

Light work undertaken by a child aged at least 14 years should not jeopardize the health or physical, mental, moral or social development of the child.

The work should not compromise the school attendance and participation of the child such as the child's possibility to do homework, prepare for tests and benefit fully from education.

The work should not take place at night-time that is before 6 AM or after 8 PM or during regular school-hours.

Although national legislation does not prescribe specific maximum hours that children can perform economic activities that are light work, the daily working time of actual work should not exceed 2 hours for a school day and 4 hours for a non-school day.

For children aged at least 14 and below 15 years, the effective weekly working time should not exceed 12 hours for a school week and 14 hours for a non-school week.

None of the tasks undertaken should be hazardous tasks

I, undersigned, confirm that I have been informed of the legal conditions for engaging my child in light work (see above) and that I have understood that there is a grievance mechanism established to which I can refer, should I not be satisfied with the conditions of work or work situation of my child.

I authorize my child / the child under my parental responsibility to carry out light work:

Child's first and last name: [Name], Date of birth: [DD/MM/YYYY],

Address: [Address], [Location]

Name of company organizing the work: [Name], [Address], [Location].

Period during which child will be engaged in work: from [DD/MM/YYYY] to [DD/MM/YYYY]

Name and signature of person with parental responsibility: [Name], [Signature]



Annex 5 – Parental authorization for the employment of a child between 15 years and 18 years

The work of a child under the age of 18 is done with parental authorization.

Submit this application, completed and signed, to the employer / the person who organizes the work of the child before the start of the work.

Legal information:

Children can, from the age of 15, be employed to perform work, provided that

- The child is no longer in compulsory education
- The work is not hazardous or likely to compromise the child's health and wellbeing
- Under condition that a medical practitioner has certified that the young person is in good health and is medically fit for work.
- A child's work is logged with the employer with name and dates of birth
- The child's age has been verified
- The child is given weekly and yearly rest periods (holidays) to the same extent as any person over 18 years
- The work does not exceed 8 hours of work per day and 43 hours per week if the work is light and if the work takes place in heavy manual work occupations the work should not exceed 4 hours per day and 25 hours per week
- The work does not take place at night-time, that is before 6 AM and after 8 PM.

I, undersigned, confirm that I have been informed of the legal conditions for employment of my child and that I have understood that there is a grievance mechanism established to which I can refer, should I not be satisfied with the conditions of work or work situation of my child.

I authorize my child / the child under my parental responsibility to be employed

Child's first and last name: [Name], Date of birth: [DD/MM/YYYY],

Address: [Address], [Location]

Name of company organizing the work: [Name], [Address], [Location].

Period during which child will be engaged in work: from [DD/MM/YYYY] to [DD/MM/YYYY]

Name and signature of person with parental responsibility: [Name], [Signature]



Annex 6: Worker Grievance Submission Form

The complaint concerns (Add company name):

Section 1: Personal Details (Optional)

Complainants Name: _____ Full

Employee ID (if applicable): _____

Department /
Worksite: _____

Contact Information: _____

Preferred Method of Contact:

☐ Email ☐ Phone ☐ In-Person ☐ Anonymous Submission

Section 2: Affected person

I am submitting this complaint on behalf of

☐ Myself ☐ Somebody else

If somebody else, affected persons' full name: _____

Section 3: Type of Grievance

Category: Workplace Issue

- ☐ Workplace misunderstandings or conflicts
- ☐ Scheduling issues or shift concerns
- ☐ Lack of resources (tools, equipment, workspace)
- ☐ Minor administrative concerns (payroll delays without financial harm)
- ☐ Other, please describe _____

Category: Labor Rights & Workplace Safety Concerns

- ☐ Unfair treatment (bias in promotions, wage disparities, favoritism)
- ☐ Harassment (non-sexual), such as bullying, verbal abuse, intimidation
- ☐ Workplace health & safety concerns (hazardous conditions, lack of equipment)
- ☐ Failure to comply with contract terms (benefits, overtime pay disputes)



☐ Other,
describe _____

Category: Legal & Ethical Violations

- ☐ Sexual harassment, exploitation, or abuse
- ☐ Workplace discrimination (race, gender, disability, etc.)
- ☐ Forced labor, human trafficking, or exploitative working conditions
- ☐ Child labor involvement or violations
- ☐ Serious safety risks (negligence leading to injuries or fatalities)
- ☐ Retaliation against whistleblowers

☐ Other, please
describe _____

Section 4: Grievance Description

Please describe the complaint in detail, including dates, locations, individuals involved, and any evidence, if available

Section 5: Desired Resolution

How would you like the company to address this issue? Tick all that apply

- ☐ Direct resolution through mediation
- ☐ Formal investigation and disciplinary action
- ☐ Workplace improvement measures
- ☐ Policy change or management intervention

☐ Other (please specify): _____

Section 6: Confidentiality Preference

- ☐ I wish to remain anonymous
- ☐ I allow human resources or management to know my identity
- ☐ I require full protection from retaliation

Section 7: Supporting Documents (Optional)



☐ Witness statements

☐ Photos / screenshots

☐ Email / message records

☐

Other: _____

Section 8: Acknowledgment & Signature

By signing below, I confirm that the information provided is accurate and submitted in good faith.

Employee

Signature

(Optional): _____

Date: ____ / ____ / ____

This box is to be filled by the Grievance Mechanism.

Received By (Name of Grievance Officer): _____

Resolution Timeline (To be filled by HR/Management): ____ / ____ / ____

Classification of case based on Severity Category (Tick One)

☐ Light Case (Minor Workplace Issues)

☐ Moderate Case (Labor Rights & Workplace Safety Concerns)

☐ Severe Case (Legal & Ethical Violations)



Annex 7: Worker Grievance Corrective Action Plan Form

This form is designed for submission into a central grievance record after assessment and response formulation.

Case Number: _____

Date of Submission: ____ / ____ / ____

Grievance Officer Handling Case: _____

Section 1: Case Assessment Findings

Category of Grievance:

- ☐ Workplace Issue
- ☐ Labor Rights & Workplace Safety Concerns
- ☐ Legal & Ethical Violations

Summary of Grievance:

(Brief description of the reported issue, including comment on category and severity)

Findings from Assessment:

(Details of investigation, including evidence reviewed, witness statements, and conclusions)

Section 2: Proposed Resolution

Resolution Type: (Tick all that apply)

- ☐ Mediation between parties involved
- ☐ Formal disciplinary action
- ☐ Workplace improvement measures
- ☐ Policy revision or management intervention
- ☐ Compensation or corrective benefits
- ☐ Other (please specify): _____

Justification for Resolution:

(Explanation of why this resolution was chosen)



Section 3: Implementation Plan

Action Steps:

(Outline of corrective actions to be taken)

Responsible Parties:

(Names of individuals or departments responsible for implementation)

Timeframe for Completion:

- ☐ Immediate (within 7 days)
- ☐ Short-term (within 30 days)
- ☐ Medium-term (within 3 months)
- ☐ Long-term (beyond 3 months)

Section 4: Monitoring & Follow-Up

Follow-Up Actions Required:

- ☐ Periodic review of workplace conditions
- ☐ Employee feedback collection
- ☐ Additional training or awareness programs
- ☐ Other (please specify): _____

Review Date: ____ / ____ / ____

Final Approval by: _____



Annex 8: Grievance Case Closure Form

This form is designed for submission into a central grievance record when a grievance case is closed

Case Number: _____

Date of Closure: ____ / ____ / ____

Grievance Officer Handling Case _____

Section 1: Case Summary

Original Grievance Report Date: ____ / ____ / ____

Category of Grievance:

- ☐ Workplace Issue
- ☐ Labor Rights & Workplace Safety Concerns
- ☐ Legal & Ethical Violations

Summary of Complaint:

(Brief description of the reported issue)

Section 2: Resolution Details

Resolution Implemented:

- ☐ Mediation between parties involved
- ☐ Formal disciplinary action
- ☐ Workplace improvement measures
- ☐ Policy revision or management intervention
- ☐ Compensation or corrective benefits
- ☐ Other (please specify): _____

Date Resolution Was Implemented: ____ / ____ / ____

Outcome of Resolution:

(Describe the final outcome, including whether the grievance was fully resolved, partially resolved, or unresolved)

Section 3: Employee Feedback & Satisfaction

Was the complainant satisfied with the resolution?



- ☐ Yes
- ☐ No
- ☐ Partially

Section 4: Final Review & Approval

Follow-Up Actions Required:

- ☐ No further action needed
- ☐ Additional monitoring required
- ☐ Further intervention needed

Final Approval by HR/Management: _____

Signature: _____

Date: ____ / ____ / ____



Annex 9: Worker Satisfaction Feedback Form

Case Number: _____

Date of Case Closure: ____ / ____ / ____

Grievance Officer Handling Case: _____

Section 1: Worker Satisfaction Resolution

How satisfied are you with the resolution of your grievance case?

- ☐ Very Satisfied
- ☐ Satisfied
- ☐ Neutral
- ☐ Dissatisfied
- ☐ Very Dissatisfied

Did the resolution address your concerns effectively?

- ☐ Yes, completely
- ☐ Yes, but only partially
- ☐ No, my concerns were not addressed

What aspects of the resolution were most helpful?

- ☐ Fairness of the decision
- ☐ Timeliness of resolution
- ☐ Communication and transparency
- ☐ Support from management or HR
- ☐ Other (please specify): _____

Section 2: Process Evaluation

How would you rate the grievance handling process?

- ☐ Excellent
- ☐ Good
- ☐ Average



☐ Poor

☐ Very Poor

Were you treated respectfully throughout the process?

☐ Yes

☐ No

Did you feel safe and free from retaliation when submitting your grievance?

☐ Yes

☐ No

Section 3: Suggestions for Improvement

What could be improved in the grievance resolution process?

Section 4: Optional Comments

(Any additional feedback or concerns)

Section 5: Acknowledgment

☐ I confirm that I have provided honest feedback based on my experience.

Employee Signature (Optional): _____

Date: ____ / ____ / ____



Annex 10: Health and Safety Hazards and Mitigation Measures

Risks/Hazard	Description	Mitigation Measures
Physical Hazards		
Heavy Machinery Operation.	Risks of collisions, rollovers, or improper use of equipment like excavators, bulldozers, and cranes. Potential for workers being struck by moving machinery or falling objects.	PPE: Hard hats, safety boots, gloves, high-visibility vests; Training: Operator certification and regular refresher training; Engineering Controls: Guardrails and safety zones. Inspections of heavy equipment and train operators. Flag man for the engineering and control.
Working at Heights	Risks of falls from scaffolding, ladders, or elevated platforms during construction activities. Falling tools or materials posing dangers to workers below.	PPE: Harnesses, helmets; Engineering Controls: Guardrails, scaffolds and fall arrest systems; Training: Safe work practices. Scaffolds will be inspected after they are mounted before they used by workers
Slips, Trips, and Falls	Uneven or wet surfaces, debris, and poorly maintained walkways increase the risk of accidents.	Housekeeping: Maintain clean, clear walkways; PPE: Anti-slip boots; Engineering Controls: Anti-slip surfaces and adequate drainage. Warning signs will be used to
Noise Pollution	Prolonged exposure to high noise levels from machinery and equipment can lead to hearing loss.	PPE: Ear protection (earplugs, earmuffs); Engineering Controls: Noise barriers; Administrative Controls: Work rotation to limit exposure.
Vibration Hazards	Use of handheld power tools (e.g., jackhammers) can cause hand-arm vibration syndrome (HAVS).	PPE: Anti-vibration gloves; Engineering Controls: Vibration-reducing tools; Health Monitoring: Regular check-ups for early detection of HAVS.
Hits from Flying and moving objects	Flying objects, equipment and tools such as moving cranes and buckets of excavators may hit site workers in the vicinity of work zones	PPEs: Provision of PPEs and ensure usage. Controls: Work zones will be condoned-off with cautions and bollards/ Warning signs will be pasted to warn workers and unauthorised persons
Chemical and Environmental Hazards		
Exposure to Hazardous Materials	Handling and storage of fuels, oils, solvents, and other chemicals pose risks of spills, fires, or toxic exposure. Inhalation of dust, fumes, or gases (e.g., from asphalt, cement, or welding).	PPE: Protective clothing, gloves, goggles, respirators; Engineering Controls: Spill containment systems, ventilation; Training: Safe handling procedures.
Air Pollution	Dust and emissions from construction activities and vehicles can cause respiratory issues.	Engineering Controls: Dust suppression systems (water sprays, covers); Administrative Controls: Scheduling to minimise exposure, regular site cleaning.
Heat Stress	Working in high temperatures without adequate hydration or rest can lead to heat exhaustion or heatstroke.	Administrative Controls: Rest breaks, hydration stations; PPE: Lightweight clothing, cooling vests; Training: Recognizing signs of heat stress.



Poor Ventilation	Confined spaces or poorly ventilated areas increase the risk of exposure to harmful substances.	Engineering Controls: Ventilation systems, regular air quality checks; Administrative Controls: Limiting time spent in confined spaces.
Biological Hazards		
Waterborne and Vector-Borne Diseases	Stagnant water at construction sites can breed mosquitoes, increasing the risk of malaria or dengue. Poor sanitation facilities can lead to waterborne illnesses like cholera.	Housekeeping: Regular removal of standing water; Sanitation Facilities: Proper toilets, handwashing stations. Potable water and canteens will be provided for site workers; Health Monitoring: Vaccinations and regular health checks.
Communicable Diseases	Close working conditions increase the risk of spreading diseases such as COVID-19, tuberculosis, or influenza.	Administrative Controls: Social distancing, PPE (masks), and sanitisation; Training: Disease prevention awareness.
Ergonomic Hazards		
Manual Handling	Lifting, carrying, or moving heavy materials can cause musculoskeletal injuries, such as back pain or strains.	PPE: Back support belts; Engineering Controls: Mechanical aids for lifting; Training: Proper lifting techniques.
Repetitive Motions	Tasks requiring repetitive movements (e.g., hammering, digging) can lead to repetitive strain injuries (RSI).	PPE: Ergonomically designed tools; Administrative Controls: Work rotation to avoid repetitive tasks; Training: RSI prevention techniques.
Psychosocial Hazards		
Workplace Stress	High-pressure environments, long working hours, and unsafe conditions can lead to stress, anxiety, or burnout.	Administrative Controls: Work-life balance initiatives, stress management programs; Training: Coping with work pressure.
Sexual Exploitation, Abuse, and Harassment (SEA/SH)	Risks of SEA/SH in male-dominated worksites, particularly affecting women and vulnerable groups.	Administrative Controls: Clear anti-SEA/SH policies; Training: Awareness campaigns; Support Systems: Confidential reporting mechanisms, Provision of case management service for affected persons
Community Tensions	Interaction between workers and local communities may lead to conflicts or safety concerns.	Administrative Controls: Community engagement and conflict resolution strategies; Nomination of Community Focal Persons and establishment of GMs with GRCs at the community level. Training: Awareness of community rights and concerns.
Fire and Explosion Hazards		
Flammable Materials	Improper storage or handling of fuels, gases, or chemicals can lead to fires or explosions.	PPE: Flame-retardant clothing; Engineering Controls: Fire-resistant storage containers; Administrative Controls: Safe handling procedures.
Electrical Hazards	Faulty wiring, overloaded circuits, or improper use of electrical equipment can cause fires or electrocution.	Engineering Controls: Regular equipment checks, proper grounding, use standards and certified cables and fittings. PPE: Insulated tools, rubber gloves; Training: Electrical safety training. Preparation and implementation of Emergency



		Response Plans as part ESIAs and ESMPs for sub projects Putting appliances when not in use
Traffic and Transportation Hazards		
Vehicle Accidents	Movement of construction vehicles and equipment in and around worksites increases the risk of collisions with workers or pedestrians.	Engineering Controls: Dedicated vehicle routes, barriers; Administrative Controls: Traffic management plans, signage; PPE: High-visibility clothing.
Pedestrian Safety	Poorly marked construction zones or lack of barriers can endanger pedestrians and workers.	Engineering Controls: Barricades and pedestrian pathways; Administrative Controls: Signage and safety personnel; PPE: High-visibility vests.
Structural Hazards		
Collapse of Structures	Risks of scaffolding, trenches, or partially constructed structures collapsing due to poor design or overloading.	Engineering Controls: Structural integrity checks, use of scaffolding standards; Training: Proper use of scaffolding and equipment.
Excavation Hazards	Cave-ins or collapses during digging or trenching activities.	Engineering Controls: Trench supports, soil stabilisation; Training: Safe excavation practices.
Radiation Hazards		
Welding and Cutting Operations	Exposure to ultraviolet (UV) radiation from welding can cause eye damage or skin burns.	PPE: Welding shields, protective clothing, gloves; Training: UV radiation awareness and safe work practices.
Emergency and Disaster Hazards		
Natural Disasters	Floods, storms, or landslides can pose significant risks to workers and project sites.	Emergency Preparedness: Prepare and implement Emergency response plans, evacuation routes; Training: Emergency drills and evacuation procedures.
Medical Emergencies	Lack of immediate access to first aid or medical facilities can exacerbate injuries or illnesses.	Emergency Preparedness: On-site first aid kits, trained medical personnel; Health Monitoring: Emergency medical response drills.

