ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN FOR HUSSIEN SCRAP METAL INVESTMENT MAKOLOH VILLAGE SONGO MASIAKA HIGH WAY.

Submitted by.

Green Vital Environmental Consultancy Company Sierra Leone Limited

ADDRESS No. 7b HALL STREET, BROOKFIELDS FREETOWN, SIERRA LEONE,

TEL:+23278411227/+23278943209

EMAIL: info@greenvitalsl.com

greenvitalconsultancy@gmail.com

Website: Greenvital-sl.com

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EXECUTIVE SUMMARY

This Environmental Management Plan report is in compliance with the Environment Protection Agency (EPA-SL) Act of 2022. The EPA-SL sets out the guidelines of the Environmental Impact Assessment for Sierra Leone. The purpose of the guidelines is to integrate environmental concerns in national development and are applicable to all types of projects in the public and private sectors for which EIA studies may be required, as identified in the lists of prescribed projects in the first schedule, section 24 in which the list identifies projects for which an ESMP is mandatory, that is the description of the operations in its geographic, ecological, and social context. Mitigation measures are needed to control, avoid, prevent, reduce and repair impacts to acceptable levels are presented, as well as an analysis of the cumulative impacts and feasible alternatives which is involved in scrap metal industry.

The Hussien Scrap Metal Investment located at Makoloh Village Songo Masiaka Highway is one of the leading players in the field of scrap trading with vast experience and specialized traders of scrap iron and coopers. They also do business with other small scale scrap metal companies all over the country. The aim of the business is to purchase scrap iron and copper for exporting. The Company seeks to undertake a comprehensive Environmental and Social Management Plan for the affected community. Operation and installation of technology under the Project, seeks to make the Project compliant to applicable environmental, social safeguards and principles of the World Bank and the Government of Sierra Leone. The approach and methodology adopted for the study included field visits, surveys, and literature review and stakeholders consultation.

The company plans to operate its business in a simple way, they buy scrap metals and coppers and then transfer to site for sorting and packing into containers for shipment. With this type of business there may be some impact within the project site like noise, dust and wastes.
Noise- the Company will try not to use too many machines as this will help to minimize the noise within the project.
Dust- to minimize the dust the company will try to be watering the surroundings within the site in order to minimize the dust, and there will be a specific speed limit that drivers should follow.
Waste Management- waste will be sorted and be disposed of properly in an environmental friendly way.

This ESMP includes several components plans defining specific action programs for Emergency Response, Closure and Reclamation, Community Development, and Public Consultation.

It defines the specific actions that will be required to effectively implement those responses in a timely manner and describes the methods by which management will demonstrate that those requirements have been met in accordance with environmental standards.

1.0 INTRODUCTION

This Environmental Social Management Plan report complies with the Environment Protection Agency Sierra Leone (EPA-SL) Act of 2022. As mentioned earlier the proponent has established a small business called Hussien Scrap Metal Investment located at Makoloh Village, Songo Masiaka Highway is involved in buying of scrap iron and coppers. The basic idea of the project is to buy unwanted scrap iron and coppers form industries and mining sites for export.

They also cater for other small-scale businesses in scrap metal all over the country. The company uses their vehicles to collect the scrap iron and cooper that has been purchased from industries across the country. While other customers transport their scrap iron and coopers to the scrap yard for sale, the company will then sort them and put the scraps in containers for shipment.

Hussein Scrap Metal Investment use to buy these scrap iron and copper from mining companies, but these companies requested for Hussein EIA License before they would sell any scrap to them. So that is why they are going through the process of acquiring there EIA License.

1.1 Purpose of the ESMP Report

The main objective of the environmental Social Management Plan is to recognize potential environmental, Mitigation Measures and social issues that require investigation and assessment by a variety of specialists in the ESMP Study,

The specific objectives of the scoping phase are to:

- Provide opportunity for all key Project stakeholders i.e., the relevant authorities, stakeholder groups and community members in the Project sphere of Influence to exchange information with the Project team and express their views and concerns regarding the Project.
- Identify key issues and concerns that require further assessment during the ESMP Study.
- Determine the specialist studies to be undertaken.
- Determining the extent of, and approach to, the ESMP.

The Environmental Social Management Plan (ESMP) provides a description of the proposed Project, information on the existing biophysical and social environment, identifies potential environmental and social issues that require investigation and assessment in the ESMP studies.

1.2 The Study Team

Hussien Scrap Metal Company has appointed a team of local environmental and social specialists to conduct the ESMP process and oversee the various specialist inputs.

Green Vital Environmental Consultancy Company is a multidisciplinary Engineering Consultancy Company based in Sierra Leone. It operates as an independent consultant with expertise and solid management support making it one of the best-organized consulting firms in the country.

Our history is rooted in the water, geotechnical, and environment sectors, with considerable experience from successful participation in the planning, design, implementation, operation, monitoring, and evaluation of numerous clients' projects and Programmes. We also have expertise in social surveys, community entry and sensitization, and policy and institutional analysis. Green Vital Environmental Consultancy can therefore boast almost ten years of consultancy experience and will coordinate the compilation of the various environmental and social studies of the EIA process.

TABLE 1 KEY PROJECT TEAM FOR THE ESMP

NO	NAME	POSITION	QUALIFICATION
1	**Clifford Davies**	Principle consultant, team leader, environmental policy Specialist	MSc (Environmental policy Applied Science) Green Business Center, UK Master's degree in Philosophy Varonesh State University Russia
2	**Mohamed Gadrie Jalloh**	Civil/ Environmental Engineer Specialist	BENG Hons Civil Engineering (University of Sierra Leone, Fourah Bay College) MSc Environmental Engineering University of Strathclyde University UK
3	**Joseph S.A Kpakiwa**	Community Development Specialist	Bsc Physics (University of Sierra Leone) Masters in Development Studies specialized in project design and program management (Njala University) Project Management Fellow monitoring and Evaluation (Institue of Pure and Applied Accounting) Community Development Program (Institute of Public and Administration and Management).
4	**Michael Mason**	Environmental Health and safety Consultant	Certificate in State-Enrolled Community Health Nurse (Defense School of Nursing) Diploma in Health and safety Management (Alison University) BSc Hons Environmental Management. (Alison University).
5	**David Munu**	Environmental Quality Consultant.	Diploma Health and Safety Management (Alison University) Diploma Community Development Studies (Licssal Business College)

			BSc Hons Environment and Development (Njala University)
5	**Augusta Doris Bangura**	Sociologist	Diploma in Cultural Studies (University of Sierra Leone, Fourah Bay College) BA Honours in Sociology (University of Sierra Leone, Fourah Bay College)

1.3 Description of activities

The planning documentation has been prepared in accordance with the requirements of the current Sierra Leonean and international legislation for this type of industry. It will also include site leasing; mobilization of personnel to site and temporary camp facilities for accommodation of few personnel as well as storage of equipment's and scraps.

1.4 Construction Phase

The target start date for the construction of the first stage of works has begun. The work is executed by a number of specialist and experienced contractors, managed as a project by a dedicated Construction Management team led by a site-based Construction Manager.

As part of the construction process, a detailed Project Execution Plan, including a Construction Management Plan and an Environmental Management Plan was made. These guided the overall process.

1.4.1 Program of Works

The Project was undertaken in three stages.

Stage 1 – Site works, construction of retention basin and hardstand areas. Within this stage the construction of the retention basin and drainage swale was undertaken first in order to ensure that the appropriate erosion and sediment control measures can be implemented for later stages.

Stage 2 – Construction of facilities, offices, toilet associated utilities and stage 2 will commence upon approval or slightly thereafter and will estimate to take up to 2 months, dependent on equipment availability.

Stage 3 –Construction of storage warehouse. This is located south-west of the site. Stage 3 will commence concurrently with stage 2 during the 2ndMonth.

1.4.2 Construction Workforce

Construction workers were mostly employed from the local community.

1.4.3 Construction Hours

It was proposed that construction activities would occur during:

Monday to Friday 8am to – 4pm;

Saturday 8am – 5pm; and

No works on Sundays and Public Holidays.

1.4.4 Construction/Operation Water Source

Water for construction purposes was sourced from onsite boreholes. This reduces environmental impact on the nearby stream, as well as time and resources that will be spent on obtaining water from the river. Onsite borehole was drilled which will subsequently be upgraded and used for the operation phase.

1.4.5 Construction/Operation power Source

The major power source for both construction and operation activities shall be 100kva diesel generator will be used to provide power for construction equipment, office lighting and service other loads associated with HSMI facility operation.

1.5. Operational phase

1.5.1 Process Description

A detailed description of the processes involved in the scrap activities is presented below.

1.5.2 Process description of the proposed project

The operation of the facility can generally be divided into the following key areas:

- Buying of scrap metals
- Transportation of scrap metal to the site;
- Sorting of scrap iron and coppers
- Storage – in the facility
- Loading into containers
- Transportation of containers to the Quay for shipment and
- Dispatch –to customers by containers.

1.6 Decommissioning

The project has a life span of 20 years activities which will be implemented in compliance with applicable regulations. Decisions regarding specific post closure land uses will need to be addressed in future with various internal and external stakeholders including local government, the municipality, the local communities and other stakeholders as identified.

A conservative approach has been adopted for decommissioning and closure. This is based on the assumption that most stringent measures likely to be imposed on the development would be that the Project site would have to be returned to normal. The activities that would be involved during the decommissioning include the following:

- Equipment with potential resale or scrap value will be removed.

- Remaining equipment will be drained of all lubricants, hydraulic oils, fuels and other process reagents and disposed of as hazardous waste.

- All power and water services shall be disconnected and certified as safe prior to commencement of any demolition works;

- All fittings, fixtures and equipment within concession will be dismantled and removed to designated temporary disposal yards;

  All water tanks not required for closure activity will be sold to licensed recyclers. Once water is no longer required on site, the remaining tanks will be sold.
  Septic tanks will be emptied and the sludge used as soil ameliorants where needed on reclaimed land.

1.7 Project Component

Hussein Scrap Metal Investment starts with an investment capital of **$15.000** (Fifteen Thousand United States Dollars).

It occupies a land space of 1acre land and the facility land is been leased for twenty (20) years and the company has 5 staff for now.

Presently the investment has a

- Warehouse
- Welding machine
- Scale
- Afrigas
- Crain machine
- Fork lift

2.0 BACKGROUND

This ESMP has been prepared to provide the supporting information for a permit under the EPA-SL Act of 2022.

Hussien Scrap Metal is a small business owned by a Bangladesh, the objective of the business is purchasing of scrap iron and coppers for export, which will then be refined.

The aim of the investment is to help reduce the way unwanted scrap iron and coppers are scattered around the country.

The availability of such facility is to help reduce critical environmental issue and an essential economic factor for a country that aspires to grow through industrial base.

The scrap industry does have severe effects on the environment, the industry is known to moderate the negative impact on the environment and bring positive economic benefits.

Our investigation examined the project's potential impacts on the immediate surroundings regarding all the phases from installation through operation and decommissioning. It encompasses all aspects of the physical, socio-cultural, health, and safety conditions at the location and surroundings during and after the project's installation.

3.0 OBJECTIVE AND CONTENT OF THE ESMP PROCESS

3.1 Policy Implementation

Environmental management of the project will be an inclusive process involving all stakeholders. Management will focus on developing the capabilities and support mechanisms necessary to administer environmental management policies. Awareness about the importance of the policies developed and their implementation program will be communicated to all sectors of the supply chain and if necessary in-house training will be conducted. Health and safety trainings will be conducted regularly and all new staffs will undergo safety induction before commencement of duty.

3. 2 Roles and Responsibilities for ESMP Implementation

The organizational structure and responsibilities for the implementation of the ESMP.

Table 2: Organizational Structure and Personnel Responsibilities

ORGANIZATION/PERSONNEL	RESPONSIBILITY
Ministry of Trade/ Environmental Protection Agency Sierra Leone	Overall responsibility for Environmental Performance of Hussien Scrap Metal Investment Decision-Making on proponents' compliance to national trading regulations Overall responsibility for ESMP monitoring during the operation phase
Hussien Scrap Metal Investment Management	Appoint an Environmental Manager. Capable of Implementing the ESMP Responsibilities Management, Implementation, Monitoring and compliance of the ESMP. Ensuring effective community liaison and fulfilling commitments to facilitate public consultation throughout the project cycle
Independent Environmental Monitoring Consultant	Conduct periodic environmental assessments on project compliance With Environmental Social Commitments in the ESMP and other Application standards.

3.3 Purpose

The purpose of this ESMP is to:

- Ensure adequate identification of potential adverse environmental impacts
- To propose workable mitigation measures
- To formulate an environmental management plan (EMP) articulating envisaged impacts.

The key objective of this study is to ensure that all environmental impact concerns are integrated at all levels of the supply chain with minimal impact on the surrounding. Additional objects include:

- To identify possible environmental impacts, both positive and negative to assess the nature of the impacts
- To propose preventive mitigation and compensative measures for the significant negative impacts of the project on the environment.
- Generate baseline data for monitoring and evaluating how well the mitigation measures are being implemented during the project cycle.
- To present information on the impact of alternatives
- To present the results of the ESMP that can guide informed decision making

3.4. Scope

The Environmental and Social Management Plan was conducted at the facility location at Makoloh Village and the surrounding area. The assessment involved onsite interviews with beneficiaries, neighboring communities, relevant stakeholders, and government agencies.

To generate Environmental and Social Management Plan for submission, it involved a systematic examination of all proposed activities.

The project assessment investigations and analysis are anticipated environmental impacts of the proposed development in line with the Environmental (Impact Assessment and Audit) compliance with the Environment Protection Agency (EPA-SL) Act of 2022.

Consequently, the report will generate the following:

- Nature of the project, describing the project and associated works together with the requirements
- The location of the project, including the physical area that may be affected by the project activities
- The activities that shall be undertaken during the project phases
- The potential environmental impact of the projects and mitigation measures to be undertaken during and after the project cycle
- An action plan for the prevention and management of possible accidents during the project cycle
- A plan to ensure that the health and safety of the workers and the neighboring communities

3.5 Social Mobilization

Results from community engagement have identified all the interest groups to promote community involvement through employment and volunteerism. Also, an inventory of current social and cultural values has been conducted and documented. In the ESMP, pursuance of interest for the common good while at the same time contributing to national development serves as a guiding principle. The study was guided by relevant national policies, legislation, regulations, and guidelines; Environmental Impact Assessment Procedures Document (EIAPD, 2004), ISO Standards, and General Best Quality Management Practice (BQMP) guidance.

4.0 LEGAL FRAMEWORK OF THE PROJECT

The relevant Sierra Leonean agencies as well as environmental and other statutory laws and regulations to guide Hussien Scrap Metal Investment from project implementation and monitoring, as well as decommissioning, include the following:

4.1 Local legislation

Local legislation applicable to environmental issues is found as Acts and regulations of the various Government Line Ministries, Departments, and Agencies (MDAs). Local legislation reviewed in this study included:

Environmental Protection Agency Act 2022

National Lands Policy: 2015

Ministry of Health and Sanitation (National Health Policy 2002)

The Local Government Act, 2004

Labour Acts 1970

Ministry of Trade and Industry (Trade policy 2010)

The Constitution of Sierra Leone, 1991

Registration of business Act 2007

Sierra Leone Local Content Agency Act, 2016 (No. 3 of 2016)

4.1.1 Environmental Protection Agency Act 2022

The Environmental Protection Agency Act 2022, is an Act to establish by the Environmental Protection Agency Sierra Leone (EPA-SL), to provide for the effective protection of the environment and for other related matters. This Act mandates the EPA to amongst others;
Make recommendation for the protection of the environment.

Issue environmental permits and pollution abatement notices for controlling the volume, types, constituents and effects of waste discharges, emissions, deposits or other source of pollutants of substances which are hazardous or potentially dangerous to the quality of the environment or any segment of the environment.

Prescribe standards and guidelines relating to ambient air, water and soil quality the pollution of air, Water land and other forms of environmental pollution including the discharge of waste and the control of toxic substances.

Ensure compliance with any laid down environmental impact assessment procedures in the planning

And execution of development projects, including compliance in respect of existing projects.

Impose and collect environmental protection levies in accordance with this Act or regulations made under this Act.

Sections 24 of the Act list project activities requiring an Environmental Impact Assessment license which includes infrastructural projects such as construction and Industries, so Hussien Scrap Metal Investment falls within this said section and that is why this ESMP report is been compiled so that they can acquire a license. Further site-specific information is given in the ESMP report prepared for this project.

Sections 25 and 26 of the Act describe factors for determining whether a project requires as environmental impact assessment and the contents of environmental impact assessment respectively the Act describes the procedures to be followed to obtain permits for both existing and proposed undertakings through the conduct of environmental impact assessments.

Hussien is still going through gradually all the processes of getting an EIA license.

4.1.2 National Lands Policy: 2015

The Lands Policy of Sierra Leone aims at the judicious use of the nation's land and all its natural resources by all sections of the Sierra Leone society in support of various socio-economic activities undertaken in accordance with sustainable resource management principles and in maintaining viable ecosystems.

In specific terms, the objectives of this policy are to:-

- Ensure that every socio-economic activity is consistent with sound land-use practices through sustainable land use planning in the long-term national interest;

- Facilitate equitable access to and security of tenure based on available registered land;

Ensure the payment, within a reasonable time of fair and adequate compensation for land acquired by government;

Provide laws that will protect citizen's right to land against the Government; and

Instil order and discipline into the land market to curb the incidence of land encroachment, unauthorized development schemes, multiple or illegal land sales, falsification and multiple registration of land documents, land speculation and other forms of land racketeering.

As provided in the Constitution of Sierra Leone, the National Land Policy, 2015 makes provision for the compulsory acquisition of land in the public interest. The principles of this policy include:

- The principle of land as a common national or communal property resource held in trust for the people and which must be used in the long-term interest of the people of Sierra Leone.

- Compensation to be paid for lands acquired through compulsory government acquisition will be fair and adequate and will be determined, among other things, through negotiations that take into consideration government investment in the area.

- Local Authorities (City and District Councils) may negotiate for land for project development purposes, but all such grants should be properly documented and processed.

- No interest in or right over any land belonging to an individual or family can be disposed of without consultation with the owner or occupier of the land.
- No interest in or right over any land belonging to an individual or family can be compulsorily acquired without payment, in reasonable time, of fair and adequate compensation.

Hussien has abide by all regulations covering the acquisition of land in Sierra Leone

4.1.3 Ministry of Health and Sanitation (National Health Policy 2002)

The ESMP study for this project was conducted within the framework of the National Health Policies and Programs. The Ministry of Health and Sanitation launched the National Health Policy in October 2002 (Ministry of Health and Sanitation, 2002). This document sets out the policy of the Government of Sierra Leone, motivating and guiding the health sector and institutions

The Ministry of Health & Sanitation (MoHS) believes that **access to sound health is a human right**, its vision is to ensure a functional national health system delivering efficient, high quality health care services that are accessible, equitable and affordable for everybody in Sierra Leone and the overall goal is to maintain and improve the health of its citizens.

It is required that a worker must have a sound environment to work and that the worker must be safe at all times.

Hussien will ensure that the environment that work will be done will be safe for its staffs.

The current national health problem includes:

- Malaria/typhoid control.
- Prevention and control Sexual transmitted infections (STIs) including HIV/AIDS. Control/eradication of Tuberculosis (TB).
- Unsatisfactory reproductive health including maternal and neo-natal mortality. Acute respiratory infections.
- Childhood immunizable diseases.
- Eradication of Nutrition-related disease.
- Prevention and Control of water, food, and sanitation-borne diseases. Prevention and Control of Mental illnesses.

Technical policies exist for many of these health priorities; they set specific objectives, targets. Furthermore, technical policies will be created in each of the remaining priority areas and the existing ones will be updated as necessary.

4.1.4 The Local Government Act, 2004

The Act establishes the local council as the highest political authority in the locality and who shall have legislative and executive powers to be exercised in accordance with his Act. This Act in its First Schedule under section 2 establishes the localities namely: Districts, towns and cities. The part of this schedule also establishes the number of Paramount Chiefs in each local council. The Third Schedule establishes the functions devolved to the local councils. The Fourth and Fifth Schedules establish departments under each local council and Evaluation list and Rate books respectively. Every project that will want to operate must pay all dues to the Local government, before operation.

Hussien will abide to the all authorities local government by paying City rates and Taxes to council.

4.1.5 Labour Acts 1970

This Act regulates relations between employers and employees, and safeguards rights and heath of the employed. The act Sets forth provisions relating to the formation and interpretation of contracts of service, the recruitment of native labor for foreign services, restrictions on the engagement of industrial workers, employment of women, adolescents and children apprenticeship contracts. Also regulates the death, insolvency and change of residence of employer; breaches of contract and disputes between employer and employed, provisions as to agents; advances by employers.

The project will adhere to both the Sierra Leone Labour Legislation and the International Labour Organization [ILO] core principles contained in the ILOs declaration on Fundamental Principle and Rights to work adopted in 1998. This is highlighted in this EIA Report.

The requirements of other relevant ILO Conventions will also be adhered to.

The labour laws of Sierra Leone have provisions for weekly working hours. These are as follows: Normal duration of working hours is not more than **8 hours in a day** Normal duration of working hours in a week is not more than 40 hours if the official holiday is during the weekend the holiday is postponed on Monday.

Hussien will ensure to abide by the labour act, and not to go against these laws.

4.1.6 Ministry of Trade and Industry (Trade policy 2010)

Trade is critical to the development of the Sierra Leone economy. It plays a crucial role in reducing poverty as it directly affects the poor's levels of income and employment, and the prices they face as both consumers and producers.

The trade policy came into act in 2010 to provide a harmonized and coherent reference for trade development in Sierra Leone.

The Vision for the Trade Policy is a competitive Sierra Leone economy that is integrated regionally and globally

The overall policy is to promote a robust and competitive private sector and support growing production and service sectors to trade, at national and international levels, and contribute ultimately to wealth and employment generation. Therefore, the core objectives of the policy are to:

- Build capacity for participation in regional and global trade negotiations
- Develop a transparent mechanism for trade
- Provide infrastructure for trade
- Ensure a trade-supporting labor market
- Promote competition
- Protect consumers
- Generate resources for Government
- Encourage the inflow of aid, private investment capital, and migrant remittances

It is of importance that Hussien trading must follow these policies.

4.1.7 The Constitution of Sierra Leone, 1991

The Constitution includes some provisions to protect the right of individuals to private property and also sets principles under which citizens may be deprived of their property in the public interest as described in Section 21of the Constitution. It also makes provision for the prompt payment of adequate compensation and access to the court or other impartial and independent authority for the determination of the land owner's interest or right, and the amount of any compensation to which he is entitled and for the purpose of obtaining prompt payment that compensation, and it is also the responsibility of the company to protect the environment.

4.1.8 Registration of business Act 2007

By the registration of business act 2007, It is required that the proprietor of every **business** required to be **registered** under this act shall make an application for that purpose in the prescribed form to the **Registrar**. After all due process the proprietor will be given

Certificate of registration Certificate of incorporation City council certificate

N.R.A Tin Number.

Hussien have done all the necessary procedures and is a legit company

4.1.9 Sierra Leone Local Content Agency Act, 2016 (No. 3 of 2016)

Being an Act to establish the Sierra Leone Local Content Agency to provide for the development of Sierra Leone Local content in a range of sectors of the economy such as industrial, manufacturing, mining, petroleum, marine resources, agriculture, transportation, maritime, aviation, hotel and tourism, procurement of goods and services; public works, construction and energy sectors; to promote the ownership and control of productive sectors in the economy by citizens of Sierra Leone; and to provide for other related matters.

This Act provides with respect to the promotion of Sierra Leone workers and services and for the establishment of the Sierra Leone Local Content Agency and the Local Content Developmental purposes.

The overall goal of the Local Content act is to promote growth and development of the domestic private sector by creating linkages with domestic and foreign firms through the utilization of local resources and workers, promote the integration of the Sierra Leoneans in all

economic activities.

The objective of the act is to develop the human and institutional capacity of Sierra Leoneans through training and transfer of knowledge and technology from foreign firms to Sierra Leoneans; it also seeks to promote employment of Sierra Leonean citizens through participation in the private sector.

Hussien Scrap Metal Investment will strictly work by the local content policy.

4.2 International Organization

- International Finance Corporation Performance Standards.
- IFC Sector Specific Guidelines
- International Labor Organization
- Land settlement (OD 4.31)
- International Conventions to which Sierra Leone is Signatory
- The Basel Convention on the Control of Tran boundary Movements of Hazardous Waste and their Disposal (Basel, 22 March 1989)
- Convention on Biological Diversity (Rio de Janeiro, 1992)
- Convention on the International Trade of Endangered Species-(CITES)
- World Bank Requirements: Appropriate IFC/World Bank policies and guidelines documents to be referred to include:
    - Biological diversity and conservation (OD 4.00 or PS 6) – promotes conservation of endangered plants, animals, habitats and protected areas;
    - Cultural properties (OD 4.25 or PS 8) – protection of archaeological sites, historic monuments and historic settlements;
    - Indigenous peoples (OD 4.20 or PS 7) - addresses the traditional rights of people including land and water rights and ensures that indigenous people benefit from development projects;
    - Land acquisition and Involuntary resettlement (OP 4.12 or PS 5) – describes how to proceed when involuntary resettlement is unavoidable.

Hussien will ensure to work by all the lay down international laws.

5.0 PROJECT DESCRIPTION

5.1 Scrap industry project

Hussien Scrap Metal Investment project is to buy unwanted scrap iron and coppers form industries and mining sites, for export

Hussien Trading Company with an investment capital of $15.000 (Fifteen Thousand United States Dollars).

5.2 Site Location

The proposed site (Land) is located at Makoloh Village, Songo Masiaka Highway It occupies 1 acre of flat land.

Figure 1: Site Map Of Hussien Scrap Metals

5.3 Proposed site development.

Presently the investment has a warehouse, welding machine, scale, Afrigas and steel lifting machine.

5.4 Waste disposal

The waste that will be generated will be general wastes, and will be collected and catered away by a certified waste collector company.

5.5 Water supply

There is no pipe-born water source within the vicinity of the proposed site however the company will construct borehole for both domestic and sanitary uses.

5.6 Proponent details and responsibilities Contact of the proponent

Table 3 details of proponent

Name	Hussien Trading Company
Address	Makoloh village Songo, Masiaka highway
Duration of project existence	20yrs
Contact person (s)`	Saddam Abunur Madbor
Number of Employee	Five (5)
Contact number(s)	075103913

FIGURE 2: PICTURES OF THE CURRENT SITE

6.0 PROJECT ALTERNATIVES

6.1. Introduction

In accordance with current environmental best practice, it is appropriate for alternatives to be considered during planning of the project, and to explain why the proposed project has been selected, including any environmental considerations. The aim is to establish whether there are reasonable alternatives, which could be pursued to meet the project's objectives with less impact on the environment, and if there are, to explain what other factors determined the choice of proposal.

6.2. Project Site

The Makoloh Village Songo Masiaka Highway was choosen because they taught such investment should not be created where populated because of to avoid injuries from people. If built in a populated area there is a tendency that the injuries may occur from people nearby. Makoloh Village is been chosen because the area is not vastly populated, and it is near to where the scrap metals are been bought from.

6.3. No Project Option

The project stands to contribute to national and local economic development, especially in an impoverished nation with a new vision 'the New Direction Agenda'. At the national level, payment of taxes and royalties. At the local level, job creation and a potential improvement in the welfare of neighboring communities and their associated multiplier effect

6.4. Identifying Alternative Sites

A feasibility study was conducted by the Team of Experts. They carefully studied several other locations around Freetown and other areas which involved technical assessment of scrap metal yards potentially along with consideration of access and transport. Based on these criteria, and the availability and condition of the various sites, the identified project area emerged as the most feasible location for the project.

6.5 Meeting Demand by Purchasing from Other Suppliers

This is the principal rationale for the project since the present sellers are unable to meet the demand for scrap metals buyers. Apart from high prices, irregular and sporadic supply has in the past affected the completion of projects undertaken by other scrap yards

It is likely that the scraps may reach the scrap yard safe quick and safe.

7.0 DESCRIPTION OF THE EXISTING ENVIRONMENT

Information pertaining to baseline conditions at the project location at Makoloh community was obtained through field visit, interviews and literature review. Several site visits were performed during the current survey. A site visit was conducted by team members in order to initiate the project field assessment.

The main purposes of this site visit were to perform a walkover for familiarization and to collect Hussien Scrap Metal Investment site-specific data, and identify the exact locations for air and noise measurement points as well drainage channels.

A preliminary survey for the environmental baseline conditions across the site and within the area of potential influence was performed including a visit to the neighborhood activities conducted during the second site visit included a drainage survey, familiarization with the proposed environmental impacts within the site.

Activities during this site visit included public consultative meetings. One-on-one interviews using structured questionnaire were held in Makoloh community to demonstrate Hussien Scrap Metal Investment commitment to the environment and to allow a forum for public comments and feedback.

7.1 Physical Environment

7.1.1 Brief Profile of the Host Community

Makoloh Village is an agricultural and trade center which lies on the main road to Waterloo-Masiaka Highway, Makoloh Village is the principal home of many people but vast majority are Temne and they are very welcoming and accommodating. The Makoloh Community rely primarily on rain fed agriculture crops such as: cassava, pepper, sweet potato, groundnut, maize, yam, Palm trees, mango and vegetables to an extent some farmers who divide their labor power between their own farms, and also small amounts of livestock (Goats, sheep and chickens).

7.1.2 Land use

The HSMI project site is situated less than 0.5 km off Waterloo Masiaka Highway. It is a built up environment. Community settlers reside around the project concession area. The Company operation site is about 0.500 km from the community people.

7.1.3 Terrestrial Ecology

The status of the terrestrial flora and fauna of the study area were determined by a review of literature relevant to the area and discussions with local persons and field investigations undertaken.

The terrestrial vegetative communities were observed to have been very disturbed and the ecological setting has been greatly disturbed by anthropogenic activities because it's a build-up environment of residential people with different activities such as subsistent farming and petty trading.

There are few birds, lizards and numerous invertebrates. The invertebrate fauna includes insects such as butterflies, ants and flies.

The HSMI project site does not contain any culturally sensitive sites like cemeteries and shrines and no environmentally sensitive sites such as forest reserves, wildlife protected areas, wetland. The major occupation of the local communities is agriculture and trading.

7.1.4 Topography

The topography within the study area is predominantly flat land and potentially fertile to do agriculture. Comparatively, the topography of Waterloo to Masiaka highway enhances condensation especially in the flat lands where it is relatively cooler and this would often form cloud thereby enhancing precipitation.

7.1.5 The Climate

The climate is tropical and humid and controlled largely by the Tropical air mass affecting the entire Sub-Region as a whole. This main type air mass can be further sub divided into Tropical Continental and Tropical Maritime. The movement of the Inter Tropical Convergence Zone (ITCZ) largely controls the seasonal variation in West Africa. As Sierra Leone is close to the maximum pole ward position of the ITCZ, only one rainy season is observed (May-October) and as the ITCZ moves away from this position brings in another season that is the dry season (November-April)

7.1.6 Temperature

The mean monthly maximum temperature in the dry season is 33.5^{o}C, while 32.4^{o}C has been recorded for the wet season. The mean monthly minimum temperature is 19.6^{o}C in the dry season and 21.8^{o}C in the wet season.

7.1.6.1 Relative Humidity

Relative humidity level at 09.00hrs is between 76.1 and 91.5% and at 1500hrs is between 41.5 - 73.5%, with low values occurring in January and high values in August and July.

7.1.6.2 Wind speed

Recorded wind speed with the aid of a portable anemometer vane probe within the project area range from 0.1 to 0.6 m/s, with a mean value of 0.3 m/s and mode of 0.1 m/s. The recorded wind speed could be

classified as low to moderate, with the exception of the exposed surface on the foot slopes on which the company lies. The value recorded in the thicket at the base of the project site was 0.1 m/s, possibly due to the effect of the surrounding houses.

7.1.7 Hydrological and Hydro-geological Status:

Surface water bodies of any sort do not exist within the area or around from the hydro-geological point of view, the community doesn't boast of a pipe burn water but instead they depend on well water. Water used in the facility will be from a borehole that will be dug within the company and used waters in the facility are going to be totally collected in a sealed septic underground store (cesspool) and emptied periodically away, then seepage of any sort to percolate to the underground strata is completely excluded.

7.1.8 Air Quality and Noise Monitoring

The air and noise qualities were surveyed within the area that the project operates. There is a garage that exists within the project area. Dust levels may be elevated in the area during Harmattan periods.

The monitoring locations have been identified depending on site characteristic in accordance with standard operating procedures. The locations are shown in the Table below.

Table 4: Sampling point location and description

Site ID No.	GPS Reading		Description of Sampling Point
	Latitude	Longitude	
HSMI−A	8. 39308 N 8^0 23'35.094	-12.94282 W 12^0 56'34.152	It is located inside the compound where the warehouse is located (upper east wing)
HSMI−B	8.39324 N 8^0 23'35. 67	- 12.94248 W 12^0 56'32.946"	Down East wing towards the trees within the compound
HSMI−C	8.39234 N 8^0 23'32. 406	-12.94263 W $12^0$56'33.474	Upper west wing within the compound
HSMI−D	8.39276 N 8^0 23'33. 93"	-12.94211 W $12^0$56'31.59"	Down West wing within the compound

7.1.8.1 Monitoring Parameters and Equipment

Sampling and analysis of all parameters was conducted according to standard operating procedure. Portable monitoring equipment was used to collect and analysed the data on site. These equipment records real time data and directly logged the ambient air quality measurements as well as metrological and noise.

Table 5: Description of monitoring equipment

No.	Equipment Name	Parameter Measured	Description
Air Quality			
1.	MULTIFUNCTIONAL AIR DETECTOR	PM_{10}, $PM_{2.5}$	➢ It can test particle diameter of PM2.5 or <2.5 micrometre particle concentration (PM10 via calculation from PM2.5) and sample time is 3seconds ➢ It Sensor type is Laser Detection Sensor and has a detection range of 0-999 mcg/m3
2.	MultiRAE pro Multi gas detector	NO_2, SO_2, CO	➢ It has over 25 intelligent intractable field replaceable sensors including gamma, ppb, ppm, electrical sensors for toxic gases, etc. and oxygen combustible LED and NDIR sensors and CO NDIR sensor. ➢ Real-time reading of gas concentration and corrective factor
Metrological Data			
1	BTMETER BT 100 (Pro Anemometer)	Wind Speed	➢ It has high precision range of 0.3~30m/s(+/- 5% of readings) and accuracy of Wind Speed: +/- 5% of readings ➢ With a resolution of 0.1m/s; 0.2℃ and 2 sensitive sensors and 8-leaves sensitive fan. Cam measure wind speed with 5 different unit
2	SNDWAY SW−524	Noise Level	➢ Distance measurement precision of ±(3mm+d 10-4 *) within work range of 0.05 to 100 meter ➢ Tolerance: ±3mm, when reflectivity 100% (white surface)

3	Delmhorst RDM−3	Relative Humidity & Temperature	➢ Measures RH over the range of 0-100% with an accuracy of +/- 2% over 10%-90%. ➢ Measures temperature over the range of -40°F-255°F with accuracy of +/- 1.8°F over -4°F to 158F (range of -40°C - 124°C with accuracy of +/- 1°C, over -20° to 70°C) ➢ Conforms to ASTM-F-2170 for in-situ testing

The parameters that was agreed upon to be collected in the survey are listed in the table below.

Table 6 Monitoring parameters and time

Parameter	Unit	Method and duration
Air Quality		
Particulate Matter ≤10 (PM_{10})	$\mu g/m^3$	In−situ reading for 12 hours
Particulate Matter ≤2.5 ($PM_{2.5}$)	$\mu g/m^3$	
Sulfur dioxide (NO_2)	$\mu g/m^3$	
Nitrogen dioxide (NO_2)	$\mu g/m^3$	
Carbon monoxide (CO)	mg/m^3	
Metrological Data		
Relative Humidity (R.H.)	%	In−situ reading for 12 hours
Temperature (Temp.)	^oC	
Wind Speed (W.S.)	Kph	
Noise	dB	

Results

Ambient air condition will change over the course of the day, and the below readings represent a snapshot of the indoor and outdoor condition at the time the readings were recorded. However, it is of practical interest to compare the measured value to international standard as there are no known national standards. The main Street is a busy road, with moderate traffic, at the time the outdoor values were measured. This was a sunny day with light winds. Measurement was taken outside the compound.

Air Quality Parameter

Table 7: Result of ambient air quality parameters

Sample Point	HSMI A				
Parameter	PM_{10}	$PM_{2.5}$	NO_2	SO_2	CO
Measured Value	16	19	17	22	0.89
Standard	50	25	25	25	4
Unit	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	mg/m^3
Sample Point	HSMI B				
Parameter	PM_{10}	$PM_{2.5}$	NO_2	SO_2	CO
Measured Value	19	17	18	12	0.74
Standard	50	25	25	25	4
Unit	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	mg/m^3
Sample Point	HSMI C				
Parameter	PM_{10}	$PM_{2.5}$	NO_2	SO_2	CO
Measured Value	21	15	16	21	0.82
Standard	50	25	25	25	4
Unit	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	mg/m^3
Sample Point	HSMI D				
Parameter	PM_{10}	$PM_{2.5}$	NO_2	SO_2	CO
Measured Value	20	17	13	13	0.57
Standard	50	25	25	25	4
Unit	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	mg/m^3
Sample Point	HSMI E (OUTSIDE THE COMPANY)				
Parameter	PM_{10}	$PM_{2.5}$	NO_2	SO_2	CO
Measured Value	24	17	20	18	1.94
Standard	50	25	25	25	4
Unit	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	$\mu g/m^3$	mg/m^3

Standard: WHO air quality guidelines 2005.

Discussion

All the parameters in table sampling point measured during the in−Situ analysis indicate that all readings in the area are below or well below IFC guidelines. However, the trend recorded at sampling point HSMI E **(outside the compound)** indicates that all the parameters are also within the IFC standards as at the time of the reading

Metrological Parameters

Table 8: Result of metrological parameter of both air and noise readings

Sample Point	HSMI A			
Parameter	Temperature	Relative Humidity	Wind Speed	Noise
Measured Value	32	40	1.6	55
Standard	37	–	–	85
Unit	^oC	%	Km/hr	dB
Sample Point	HSMI B			
Parameter	Temperature	Relative Humidity	Wind Speed	Noise
Measured Value	33.5	40	4.0	61.2
Standard	37	–	–	85

Unit	^{o}C	%	Km/hr	dB
Sample Point	HSMI C			
Parameter	Temperature	Relative Humidity	Wind Speed	Noise
Measured Value	31.5	45	3.2	60
Standard	37	–	–	85
Unit	^{o}C	%	Km/hr	dB
Sample Point	HSMI D			
Parameter	Temperature	Relative Humidity	Wind Speed	Noise
Measured Value	34.4	41	2.2	57.6
Standard	37	–	–	85
Unit	^{o}C	%	Km/hr	dB
Sample Point	HSMI E (OUTSIDE THE COMPOUND)			
Parameter	Temperature	Relative Humidity	Wind Speed	Noise
Measured Value	29	43	5.3	48.0
Standard	37	–	–	55
Unit	^{o}C	%	Km/hr	dB

Note: IFC standard for noise in residential, institutional and educational area during the Day is used

Discussion

The result of the noise level showed that the noise level at HSMI E sampling points were generally well below the standard as stipulated in the IFC guidelines, and it thus appeared that the existing facilities at the site are operated in an environmentally friendly manner in relation to noise creation.

The result of the wind speed was compared to the **"Beufort Wind Scale"** which is annexed below. It shows that all the sampling points are within the safe category (i.e. <1−18km/hr.) and are considered to be between calm and gentle breeze.

The result shows that the relative humidity and temperature of all the sampling points are very normal.

Conclusion and Recommendation

Based on the outcome of the in−situ analysis of all parameters result which was carried out in 5 sampling points, it can be said that there were no negative impact within the project facilities except for one sampling point outside the company facility. This was done deliberately to determine the effect of other activities in close proximity to the community.

Finally it can be concluded that the project sites has no detrimental impact on the environment in terms of ambient air, ambient noise and metrological parameters

Figure 3: Air and Noise Monitoring Reading

7.2 Socio-Economic Environment

7.2.1. Overview

This section presents analyses the socio-economic profile of the households in surrounding communities mainly from the rapid informal interviews and comments from key stakeholders. It provides a brief overview of the key socio-economic features of the community. The section is not expected to be exhaustive, but to provide a context within which the proposed project impacts can be viewed and assessed. The first and the last settlements are on the highway. These communities are the reference point for the socio-economic survey the Team assumed that it is representative of all areas to be affected by the project activities.

7.2.2. Sex Distribution

In Sierra Leone it is always available to acquire detailed and inclusive population data especially for urban area of the project area. This however, constitute an impediment to the study. The Team was able to piece together information on the socio-economic outlook of the project area through a rapid informal interview conducted during the snap-shot visit to the project area. The analysis from this rapid informal interview indicates that fifty five percent (65%) of respondents were male and forty five percent (35%) female. This large number of male respondents tends to mirror the fact that male are mostly the bread winners in the family and normally tends to be heads of their households.

However, there can be little doubt that females play an important role in the community and their views and opinions are as important as their male counterparts.

7.2.3 Ethnicity Composition of the Area

A significant proportion of respondents were 65% Temne, with the next significant ethnic group being 20% Mendes, 10% Limba others 5%. The dominance of a single ethnic group in the population is typical of most rural areas in the country even in the face of high influx of immigrants to such areas.

The population of the area is typically rural, with an average household size of 6 persons. A greater percentage of the residents in the area are indigenous, although there are a higher number of in-migrants to the project area.

8.0 IDENTIFICATION OF POTENTIAL IMPACTS

8.1Introduction

This chapter discusses the environmental and socio-economic impacts that may result from the Project. Within the context of this ESMP report, an impact is any change to a resource or receptor brought about by the presence of the Project or by the execution of the Project's related activities. Identifying the main impacts brings together the previous steps to ensure that all potentially significant environmental and socio-economic impacts (negative/adverse and positive /beneficial) are identified and taken into account in the ESMP process.

8.1.1Potential Environment Impacts

8.1.1.1 Constructional phase

- Dust emission in air as a result of construction and vehicular movement
- Noise
- Workers health issues
- Public health

8.1.1.2Operational Phase

- Exhaust emissions from the combustion of the stand by fossil fuel generators.
- Particulate matter and odors emissions from the transportation of Scrap metal and coppers to the site.
- Emissions of dust in the air as a result of vehicular movement
- Waste Management issues
- Noise nuisance
- Public health and safety issues
- Emergency situations

8.1.1.3Decommissioning phase

- Excavation and other preparatory works related to the decommissioning of the site and rehabilitation of the associated facilities, including offices, workshops, and warehouse.

8.1.2Potential Socio-Economic impacts

8.1.2.1Positive Beneficial Impacts

- Job opportunities/employment of local residents;
- Social welfare and infrastructure;
- Economic development in the area of operation
- Improvements in local skills;

8.1.2 2Negative (Adverse) Impacts

- Population movements;
- Potential conflict from issues related to labor;

- Potential conflicts from unrealistic expectations held by the communities' concerning benefits created by the project
- Vehicular traffic and safety risk

9.0 PREDICTION, ASSESSMENT AND MITIGATION OF IMPACTS

9.1 Introduction

The purpose of this chapter is to identify and evaluate the significance of potential impacts and identify receptors and resources according to defined assessment criteria.

The ESMP Project team undertook the prediction of impacts to identify the magnitude and other dimensions of identified change in the environment with the Project by comparison with the situation without the project. The project team used the Leopold matrix, which is the best Know matrix methodology available for predicting the impact of the project on the environment. The project team assessed the magnitude and the importance of each impact using various Parameters (e.g. spatial and temporal scales, reversibility, likelihood, etc.) to characterize the Project impacts. Once an assessment is made of the magnitude and importance, the relative significance (i.e. the importance for decision-making) of the predicted project impacts is evaluated, assessed and expressed (through a matrix process) as a function of impact magnitude and the significance of the identified resources or receptors according to defined assessment criteria. This allowed the ESMP study to focus on the main positive (beneficial) and negative (adverse) impacts of the project.

9.2 Methodology

The ESMP project Team used the matrix to recognize interactions, which constitute impact, between stakes, the thrust, and phases, to quantify and/ or qualify the magnitude and importance of such impacts.

The project team used a more straightforward matrix-a double-entry table that lists project activities at different stages and components of the biophysical, human and socioeconomic environment, on the ground, and measures impact based on logical methods to give an esteemed value on the other hand. It is used to elevate the most essential Interactions in the Leopold matrix based on the following indicators: the sensitivity of the environmental component, the magnitude, intensity, and duration of impact.

9.3Predicting, Characterizing and Importance of Impacts

Characteristic of the environmental effects vary, and the main parameters used to characterize and evaluate the impacts in this ESMP study are described in terms of:

Nature (Direction)-The most impacts are directly related to the project and can be directly attributed in space and time to the simple action. Indirect or secondary impacts generally cause less obvious changes occurring later and far from the source of impact. In general, cumulative effects are caused by the amplification of an impact when combined with the impacts of other projects completed recently or underway. On an individual basis, these impacts may be insignificant, but together, they become essential as the effect becomes compounded. The resultant effect may be obtained by cumulating the different impacts such that the overall products are greater than the sum of individual results

- **GEOGRAPHIC:** Extent/spatial scale the geographic extent is the distance over which the effect is propagated due to the activities and the resultant impact on surrounding community and ecological system. Depending on the type of influence, it is possible to predict the extent of the geographical area

which will be significantly impacted by the above environmental conditions.

Thus, an impact may be:

- **Local:** impact that occurs in the vicinity of the project and affects a locally vital environment resource.
- **National:** Impacts that affect nationally important environment resources or affect an area that is nationally important or protected.
- **International:** Impacts that affect internationally important environmental resources such as areas protected by international conventions.
- **Trans-boundary:** Impact that is experienced in one country as a result of activities in another (greenhouse gas, river pollution).

- **Duration/Temporal Scale- Duration refers to the period over which an effect occurs**:

Short-term: impact predicted to last only for a limited period (such as during construction phase etc.) which will end on completion of the activity, or as a result of mitigation measures and natural recovery. An impact may last for a short term;

In this case, less than a year temporary impact may span several days, weeks, or months. However, it must be reversible. For species, impact occurs for less than one generation.

- **Medium-term**: impact that will continue over a period (i.e. one to ten years) continuous, intermittent, or repeated. For species, impacts occur for more than one generation

- **Long-term**: impact that will continue over a period (i.e. one to ten years) continuous, intermittent, or repeated. For species, impacts occur for more than one generation. When it lasts for the long term and is irreversible, it is referred to as a permanent impact.
- **Permanent**: when an impact lasts for a very long term and is irreversible, it is referred to as a permanent impact.

Closely related to the duration of the effect is its frequency. The frequency of effects and the potential of the environment to recover from these effects are considered important.

- **Once: occurs only once**
- **Continuous: occurs on a regular basis and regular intervals**
- **Sporadic: rarely occurs and at irregular intervals.**

Long-term environmental effects may be significant, and considerations given to negative impacts of the environment to recover from these effects are considered important.

- **Reversibility or irreversibility-** Reversibility refers to the environmental recovery once an impact has occurred. Irreversible environment impacts are considered more significant than those that are reversible.
- **Reversible**. Environmental component recovers to the pre-project level. The rate of recovery is important.

- **Irreversible:** The impact that causes a permanent change in the affected receptor or resource (e.g., the felling of old-growth forest due to the occupation of the site, landscape changes caused by project).
- **Likelihood**- Likelihood is defined as the probability of an impact occurring, taking into account two criteria:

Probability of occurrence- If there is a high, medium or low probability. Significant environmental impact will occur.

The certainty of significance-there will always be some uncertainty (confidence limit) associated with ESMP

- Likely: high probability **(50%)** that impact will occur or high certainty that impact will be significant.
- Unlikely," low probability **(50%)** hat impact will occur or high uncertainty in significance prediction.
- Magnitude-magnitude measures the severity of environmental effects, including perception. In general, magnitude is expressed in severity (major, moderate, minor or neglible). As opposed to the significance, magnitude also considers other aspects of the extent of impact, including its reversibility or irreversibility.

9.4Prediction, Assessment, and Mitigation of Environmental Impacts

9.4.1 Construction Phase

9.4.1.1 Noise Pollution

The construction phase will utilize few machineries.

Noise Pollution-Construction Phase

Medium/Affected Receptor	**Assessment and evaluation of significance of the impact**					
	Extent	**Duration**	**Likelihood**	**Magnitude**	**Important**	**Significance**
Significance workers	**Local**	**Short term**	**Likely**	**Medium**	**Minor**	**Low**
Mitigation Measures						
The facility will have some vehicles that will be supplying granite sand and cements The management will advise drivers on speed limit. All personnel especially those engaged in welding area will be provided with glasses protection gear to protect their eyes as they carry their duties in the project operation.						

9.4.1.2Air pollution

Dust particles may occur during the construction phase, like dusts and cements.

Air pollution –Operational phase

Medium/Affected Receptor	Assessment and evaluation of significance of the impact					
	Extent	Duration	Likelihood	Magnitude	Important	Significance
Workers	Local	Short term	Likely	Medium	Low	Low
Mitigation Measures						
The premises will be watered daily during construction, although some dust may occur during mixing of concrete workers will be trained on how to protect themselves from inhaling dust, fumes that may be present in the atmosphere						

9.5 Operational Phase

9.5.1Noise Pollution

The operations of some machinery and vehicles will contribute to noise pollution during working hours.

Noise Pollution-Operational Phase

Medium/Affected Receptor	Assessment and evaluation of significance of the impact					
	Extent	Duration	Likelihood	Magnitude	Important	Significance
Significance workers	Local	Short term	Likely	Medium	Minor	Low
Mitigation Measures						
The facility will therefore to reduce the noise by installing adequate silencers to the various machines and equipment's that will be used All personnel especially those engaged in cutting area and operating machines will be provided with ear protection gear to muffle the noise as they carry their duties in the project operation.						

9.5.2Air Pollution –Operational Phase

The main air pollutant from the Hussien Scrap Metal Investment operation consists of particulate matter (PM) PM arises from scrap metal handling. Operational activities will generate dust that reduces the air quality of the project area and areas beyond the project area through diffusion when strong winds are evident. There will also be the generation of fumes from vehicular movements, generators, and other engine operated equipment, which would increase the particulates in the atmosphere.

Air pollution –Operational phase

Medium/Affected Receptor	Assessment and evaluation of significance of the impact					
	Extent	Duration	Likelihood	Magnitude	Important	Significance
Workers and residents	Local	Short term	Likely	Medium	Low	Low
Mitigation Measures						
The premises will be watered daily, in order to reduce dust. Workers will be trained on how to offload and load scraps. Protective respiratory equipment will be provided for and used by employees so that they would always be protected from inhaling dust, fumes that may be present in the atmosphere.						

9.5.3Solid Waste- Operation Phase

The solid waste from the project will be general waste like plastics, cans, cups, bottles rubbers papers etc.

Solid waste -operational phase

Medium/Affected Receptor	Assessment and evaluation of significance of the impact					
	Extent	Duration	Likelihood	Magnitude	Important	Significance
Workers and residents	Local	Long	Likely	Medium	Major	High
Mitigation Measures						
A reputable solid waste handler will be contracted to regularly collect unwanted solid waste for appropriate disposal following the local Authority Guidelines There will be adequate provision of strategically placed waste bins all over the building compound to ensure that there is proper disposal of litter						

9.5.4 Liquid Waste- Operation Phase

The liquid waste from the project will be liquid like sewage and waste water etc.

Liquid waste -operational phase

Medium/Affected Receptor	Assessment and evaluation of significance of the impact					
	Extent	Duration	Likelihood	Magnitude	Important	Significance
Workers and residents	Local	Long	Likely	Medium	Major	High
Mitigation Measures						
Liquid waste water will be safely catered away from the premises, and the sewage waste tank will be installed when filled a reputable liquid waste handler will be contracted to regularly collect and empty the liquid waste for appropriate disposal following the local Authority Guidelines						

9.6 Decommissioning Phase

9.6.1 Solid and Liquid Wastes – Decommissioning Phase

A huge quality of solid and liquid waste will be generated at the closure of the facility operation. These wastes will generally include particulate matter, solid and other hazardous wastes. Waste will also be generated during the dismantling of structures such as the machines and other structures.

Solid waste –Decommissioning phase

Medium/Affected Receptor	Assessment and evaluation of significance of the impact					
	Extent	Duration	Likelihood	Magnitude	Important	Significance
Land water and residents	Local	Long term	Likely	Medium	Major	High
Mitigation Measures						
A reputable solid waste handler will be contracted to regularly collect unwanted solid waste for appropriate disposal following the Local Authority Guidelines The materials will be properly separated to encourage recycling of some them.						

Liquid waste –Decommissioning phase

Medium/Affected Receptor	Assessment and evaluation of significance of the impact					
	Extent	Duration	Likelihood	Magnitude	Important	Significance
Land water and residents	Local	Long term	Likely	Medium	Major	High
Mitigation Measures						
liquid waste will be disposed of accordingly, and sewage tank will be emptied and returned back for the use of the community.						

9.7 Negative Impacts

9.7.1Population Movements

There is the possibility of migration into the project area by potential job seekers due to the existence of Hussien scrap Metal and a possible increase in population will lead to constraints on the existing infrastructure, especially the community's project basic amenities. An influx of job seekers and family members to the project area would increase the community's population.

Population Movement

Medium/Affected Receptor	Assessment and evaluation of significance of the impact					
	Extent	Duration	Likelihood	Magnitude	Important	Significance
Land water and residents	Local	Long term	Likely	Medium	Major	High
Mitigation Measures						
It is recommended that the Hussien Scrap Metal: Provide assistance to the communities for the development of some communal facilities such as the provision of potable water (by constructing hand pump well) or pipe born water tap. This assistance could be part of the Community Development Programmers in agreement with the communities.						

9.7.2Vehicular Traffic and Safety Risk

An increase in vehicular traffic to the facility or delivery activities could lead to accidents. There may also be project infrastructure and project activities which carry safety risk.

Vehicular Traffic and Safety Risk

Medium/Affected Receptor	Assessment and evaluation of significance of the impact					
	Extent	Duration	Likelihood	Magnitude	Important	Significance
Land water and communities	Region	Long term	Likely	Medium	Moderate	Moderate
Mitigation Measures						
Hussien Scrap Metal Investment will ensure a free flow of traffic and safety signs will be in place to guide drivers and the entire public.						

10.0WASTE MANAGEMENT PLAN

10.1 Introduction

The Waste Management Plan (WMP) is an essential component of the Environmental Impact Assessment for the Hussien Scrap Metal Investment.

The WMP describes Hussien Scrap Metal Investment commitment in taking all necessary steps in ensuring that the generation, collection, storage and disposal of all wastes generated during all phases of the project operations will be conducted in a safe, efficient, and environmentally responsible manner.

10.2 Objectives of the Waste Management Plan

The objectives of the WMP are to:

- Ensure that the least possible amount of waste is generated through reduction, reuse and recycling practices, and review/approve all orders for scraps and supplies to limit the environmental impact;
- Promote occupational and environmental health and safety;
- Prevent pollution of the natural environment including air, storm water and the ground;
- Ensure due diligence is followed by all project personnel;
- Track waste generation, handling and disposal to assess whether waste management is being carried out efficiently;
- Avoid costly clean-up through prevention;

10.3Waste Management and Disposal Facilities

10.3.1Waste Identification

Waste streams likely to be generated during operations include the following:

Domestic wastes;

Management of this waste stream is discussed in subsequent chapter.

10.3.1.1. Domestic Wastes

This category includes wastes generated from the day to day running of the Hussien office and may comprise the following items:

i. Foil containers, drums etc.;

ii. Plastic, cardboard, papers, tissues rubber etc;

iii. Sanitary waste/sewage.

Wastes of this nature are stored in plastic waste bins trash purposely designed for waste collection use, and distributed throughout the facility. The bins are labelled for easy identification. With a total workforce of 5, the amount of domestic waste generated on a daily basis is minimal.

The bin handling domestic wastes will be for putrescible and non-degradable items. Staff will be sensitized as to the types of materials which they should deposit in each of the bins. Training will also be given on how to limit the amount of waste that goes into the bins, highlighting the importance of re-use and re-cycling of materials.

A designated member of staff will be assigned to monitoring the waste traffic, and will also be in charge of sorting and organizing the transfer of the wastes to the garbage collector.

Sanitary and liquid waste is channeled into underground septic tanks within the facility.

10.4 Management Responsibilities

The safety adviser will be responsible for implementing and updating the WMP, and carrying out regular compliance monitoring. He will maintain records and report on any significant environmental matters, including monitoring data, accidents and incidents related to waste management. The records and report will be reviewed by the managerial staff to improve the effectiveness of the Waste Management Plan.

10.4.1Management Training Responsibilities

Properly trained employees are necessary for the safe and effective operation of any facility. Training will be complemented with safety precautions which will also include protective clothing pertinent to the work activity, area, and schedule. Clothing may include such items as hard hats, hard-toe boots, chemical resistant impervious gloves, safety glasses, etc. General safety rules will be posted in strategic locations in the project area to describe general safety requirements for waste disposal facilities and equipment.

New employee training programs and annual refresher courses on proper waste management and disposal will be conducted.

10.5 Employee Training Courses

Employees will be trained in the following safety topics before employment commences and will also be reminded in annual refresher courses to limit the potential for accidents. These courses will be developed and implemented by the Environmental Safety Adviser:

- Accident prevention;
- Differences between wastes streams and an overview of incompatible wastes;
- Proper control and maintenance of equipment and waste facilities.

10.6 Requirements of Personal Protective Equipment (PPE) for waste disposal Waste management personnel collecting and disposing waste must wear appropriate PPEs. The minimum required PPEs are:

- Neoprene chemical resistant gloves or better-quality gloves;
- Safety boots;
- Coveralls;
- Respirators
- Hard hats;
- Safety glasses,

10.7 Individual Protection Measures/ Hygiene Measures after Handling Wastes

Wash hands, forearms and face thoroughly after handling waste products, particularly hazardous wastes. Safety eyewear complying with an approved standard should be used when handling wastes to avoid liquid splashes, gases or dust.

11.0ENVIRONMENTAL MONITORING

Environmental monitoring is an essential component of a project review phase following the Environmental Social Management Plan (ESMP). To thoroughly assess the benefits and impacts of the project by Hussien Scrap Metal Investment, an effective monitoring program must be established to quantify relevant elements of the physical, biological and socio-cultural environments. The monitoring of various environmental parameters will help confirm any expected effect and address the effectiveness of implementing the mitigation measures.

The monitoring program will help gather data that will be used to determine the project's environmental performance. The major environmental and social issues on which monitoring will be focused on the operational stages of the project are:

Environmental Ambient Air Quality Ambient Noise levels
Solid and Liquid Waste Management

Social and Health Public safety issues
Occupational Health and Safety Traffic Impact
Community Development Action plan implementation.

Table: 9 Environmental Monitoring.

NO	Environmental Parameters	Locations Monitoring Responsibility Frequency	Application Standard/Guidelines
	Operation Period		
1	Particulate dust (PM10) Carbon monoxide Nitrous oxide Sulphur dioxide	Bi-Annual and Annual within facility areas and compound. Engage services of an independent firm	In Consultation with EPA-SL and Copied Results Accordingly
2	Noise	Bi-Annual and Annual within Facility areas; and neighbouring communities. Engage services of an independent firm	In Consultation with EPA-SL and Copied Results Accordingly
4	Grievances reports	Hussien Scrap Metal Environmental Coordinator	In Consultation with EPA-SL and Copied Results Accordingly
5	Number and Severity	Continuous within and outside the concession of Hussien Scarp Metal	In Consultation with EPA-SL and Copied Results Accordingly

12.0. PROVISIONAL ENVIRONMENTAL MANAGEMENT PLAN

A Provisional Environmental Management Plan (PEMP) for Hussien Scrap Metal investment project is included in this ESMP Report. The Plan aims to act as a guiding manual for the mitigation and monitoring of the impacts as well as to confirm the baseline parameters stipulated for the project of the operation and maintenance of the facilities. An estimated environmental budget for the PEMP is also included in this report.

12.1. Objectives of the PEMP

The implementation of the PEMP will meet the following objectives:

- Provide the platform to accommodate changes and uncertainties on the project
- Manage actual impacts on the project implementation phase
- Ensure proper implementation of project permitting conditions
- Ensure satisfactory environmental performance
- Serve as a source of background information for future projects

12.2. Programs to Meet Requirements

Measures to be instituted to meet the above objectives include:

- Workers information and training programs
- Public and community participation
- Audits and Reviews
- Environmental Management budgeting

12.3. Management Structuring

The Management of Hussien Scrap Metal Investment in collaboration with other stakeholders will form an environmental, occupational health and safety committees comprising management and field supervisory staff to address impacts from any further activities whiles the company is at its operations.

An experienced environmental specialist will be contracted to serve as a mediator

12.4. Responsibility of the Environmental Committee

The functions of the committee will include:

- Ensuring the implementation of the prescribed environmental and safety actions given in the ESMP with regards to the project.

- Liaise with the local communities and affected parties on all such matters of environmental concern affecting all stakeholders.

- Work closely with the various managers and supervisors and other members of staff to coordinate all activities bordering on the environment, occupational health and safety.

- Process and manage environmental data that will be generated during the period to be presented in a friendly way to ensure easy consumption and appreciation by the management, other stakeholders, and the general public.

- Consult with management to decide the role of Consultants/Experts and other third parties required to assist in the implementation of the environmental management and monitoring programs.
- Environmental Co-coordinators will be responsible for the implementation of the action plans.

12.5. Information/Awareness Creation Programs

The objective of the environmental Social Management Plan will best be achieved if every staff is adequately informed on the effects of the various operational activities on the local environment in particular and on workers/public health and safety.

Hussien Scrap Metal management is aware that a well-informed and trained staff will contribute immensely towards environmental management through the judicious use of resources, appropriate disposal of wastes, and the prevention of accidents that might damage equipment, personnel and the general environment.

12.6. The Contractors and their Workers

Contractors will discuss environmental, health, and safety obligations within this contract with all workers. These obligations will be made available or accessible to all employees, including casual or sub-contract workers. The various field supervisors will be tasked to ensure that all workers adhere to the environmental and safety provisions.

Regular morning meetings may form the main means of communicating all health and safety issues to workers. Periodic practical training programs will be organized for workers who use equipment and machines to prevent or minimize accidents on the job.

12.7. Hussien Scrap Metal Investment Management and Staff

Management will develop and make available all operational manuals, including policy documents on the environment, health and safety to relevant staff, and organize short courses for staff where necessary to ensure the proper use of all equipment.

Environmental, occupational health and safety issues will form part of all plans for management meetings, seminars, and workshops for all workers. Management will produce hand-outs on environmental and safety issues for all supervisory level staff relating to their respective work areas.

12.8. Public Participation

Management and Contractors will welcome any complaints, suggestions, and advice on environmental and safety issues of concern.

Aggrieved individuals, neighbors, or the community will make or submit all complaints or concerns to the Management for redress.

12.9. Closure Plan (CP)

The Closure Plan documents plans required to restore the site to a pre project activities state, ensuring that the land can be used in beneficial post-operation land use.

13.0. ANNUAL ENVIRONMENTAL AUDITS

Hussien Scrap Metal management will undertake periodic environmental/safety audits on its activities. This will be useful for finding the areas of the operation that impact the most on the environment. It is also a useful risk management tool for checking how effectively their process acts per environmental regulations. Critical highlights as follows:

- The audit will assess the nature and extent of harm to the environmentcaused by the activities and its waste
- Assess how Hussien Scrap Metal can manage or improve thecondition of the environment
- Priorities what actions can be taken to reduce the impact on theenvironment
- Demonstrate accountability to third parties such as government andother local and international partners

Hussien Scrap Metal will ensure that the environmental audits are independent, objective, credible, and transparent to be successful. The audits will alsobe regular and ongoing and conducted against a benchmark or initial assessment, generally detailed in the environmental management plan.

The monitoring program will also provide relevant information for effective environmental auditing and reviews. These will underpin the periodic update of the environmental management plan.

13.1. Environmental Management Budget

The environmental management and monitoring programs earmarked for implementation require detailed cost analysis to determine the actual budget needed. Certain cost elements such as equipment maintenance and management costs will form part of the operational cost and therefore have not been included.

Table: 10 Environmental Management Budget

Programmer	Description	Costs (US$)/year
Water qualityAir quality Noise	Locations at site Bi Annual and Annual	**500**
Occupation Health and safety	Provide PPE's for staffs	**1000**
Total		**1,500**

14.0. ENVIRONMENT, HEALTH AND SAFETY (EHS) POLICY

14.1. Environmental Policy

The Hussien Scrap Metal Investment Environmental Policy ensured high environmental standards in all its operations to minimize pollution and environmental damage to the barest minimum. The objectives of the Policy are as follows:

Adopt the principles of the ***(buying, cutting, sorting packing and shipping.)*** to ensure resource use efficiency. Adopt acceptable management practices that reduce pollution and contamination of the environment, and Ensure compliance with all environmental laws and procedures.

14.2. Health and Safety Policy

The Health and Safety Policy of Hussien Scrap Metal Investment ensures maintaining high standards in occupational health and safety in all its operations to provide a safe and conducive working environment for its workers.

The Policy objectives are:

- Adopt and implement a significant health and safety system
- Provide and enforce the appropriate use of personal protective equipment for all operations
- Minimize accidents and incidents to the barest minimum
- Compliance with all health and safety regulations
- Identifying and preventing or minimizing real potential hazards associated with the plan to operation, particularly injuries from accidents, exposure to high noise level, and excessive cold
- Encouraging the prompt reporting of fall accidents and injuries
- Creation of employee's awareness on-the-job-safety practices through periodic safety training programs
- Ensuring the provision and use of employee's personal protective clothing and gears
- Adopting an emergency response plan to handle all unforeseen emergencies like fire outbreaks, accident during loading and off-loading

14.3. Occupational Health and Safety Monitoring

The following will be essential monitoring of occupation health and safety of both workers and visitors Hussien Scrap Metal will assist in the monitoring of work-related injuries, ill health and incidences at the vicinity and the various Pre-employment medical check-up

- Periodic medical check-up
- First Aid training
- Fire audits

- Safety audits
- Staff welfare –portable drinking water provision, storage facility, washroom and sanitary facilities
- First Aid kit (box) should be available at the site. Records of First Aid training of employees should be kept.
- There should be fire extinguishers and marked fire exit points. Any fire outbreak should be recorded.

15.0 EMERGENCY PREPAREDNESS AND RESPONSE PLANS

The Emergency Action Plan (EAP) is in place to ensure employee safety from fire and other emergencies. At the time of an emergency, all employees should know what type of evacuation is necessary and their role in carrying out the plan. In some emergencies, total and immediate evacuation will be required. In other emergencies, only partial evacuation may be necessary.

When a fire is detected it is necessary that the fire alarm pull station be activated as soon as possible. The fire alarm will notify the emergency response team who will perform assigned duties, while the rest will rush to the designated emergency meeting point. The national fire force will be alerted immediately.

16.0. STAKEHOLDER PARTICIPATION AND CONSULTATION

Stakeholder's participation and consultation for the project have a critical role in integrating economic, social and environmental objectives and thus move towards more sustainable development by acting as a device to strengthen and increase public awareness of the delicate balance between economic and environmental tradeoffs. Besides, stakeholder engagement is the basis for building robust, constructive and responsive relationships essential for the successful management of the project's environmental and social impacts.

This is an on-going process that may involve, in varying degrees, stakeholder analysis and planning, consultations, disclosure and dissemination of information, public participation, and reporting to affected communities. The nature, frequency and level of effort involved in this process commensurate with the project's risks and adverse impacts as well as the project's phases of development as required by the Environmental protection Regulations, and WB"s Policy on Disclosure (BP 17.50).

16.1. Criteria for Stakeholder Identification

A professional blend of literature reviews, expert judgment, and discussions with officials from key governmental institutions was the basis for identifying the various stakeholders. The primary considerations in the selection of stakeholder groups are presented below.

Table: 11 Stakeholder Identification

Criteria	Stakeholder(s) Identification
Those involved in the actual project implementation.	Hussien Scrap Metal Investment and EPA-SL
Those who activities coincide or overlap with those proposed by the project.	EPA-SL, MHS, ML, MTA
Those who may be affected directly or indirectly by the proposed project.	Makoloh Village off waterloo, Masiaka Highway Western Rural District.
Those who interests and influence can affect implementation of the proposed project.	EPA-SL, MHS, MLCP, ML, MTA
Others that have a stake in the project.	Media Public and New Papers.

17.0. COMMUNITY DEVELOPMENT ACTION PLAN

The purpose of the Community Development Action Plan (CDAP) is to propose a plan that would provide remedies and community action plans for welfare improvement at the project communities. The idea is to make the CDAP activities lead to sustainable livelihood development (SLD), for the Hussien Scrap Metal Investment in the project communities.

17.1. Budget

The total budget for implementing the recommended projects in this CDAP is estimated at **Le 20,000** (Twenty Thousand Leones) per year over a five-year period. This budget covers the indicated developmental projects for the communities within the project area.

Table 12 CDAP BUDGET FOR HUSSIEN SCRAP METAL INVESTMENT.

BUDGET FOR HUSSIEN SCRAP METAL INVESTMENT					
YEAR 1 Support to digging of borehole	**YEAR 2 Support to digging of borehole**	**YEAR 3 Support to Education (scholarships and Materials)**	**YEAR 4 Support to Education (scholarships and Materials)**	**YEAR 5 Support to renovation of borehole**	**TOTAL BUDGET FOR 5YEARS**
Le 20,000	**Le 20,000**	**Le 20,000**	**Le 20,000**	**Le 20,000**	**Le 100,000**

17.2. Monitoring and Evaluation

There is a need to appoint an independent agency to undertake ongoing monitoring and evaluation and review of the CDAP. Monitoring will be undertaken every three months during the operational period and will subsequently be conducted on a six- monthly basis till the end of the project. The monitoring Programs will address both the short term and long-term impacts of the Hussien Scrap Metal Investment.

Monitoring activities will include:

Ensuring the satisfactory implementation of the CDAP

Responsibility for environmental management and infrastructure maintenance is transferred to local leadership, and that unsuitable dependencies are not created

Environmental degradation is limited so that the economic and resource base on which the community depends is not destroyed.

18.0 GRIEVANCE REDRESS

Grievance mechanisms provide a formal avenue for affected groups or stakeholders to engage with the project implementers or owners on issues of concern or unaddressed impacts. Grievances are any complaints or suggestions about the way a project is being implemented. They may take the form of specific complaints about damages/injury, concerns about routine project activities, or perceived incidents or impacts, or in this case, issues about implementing the CDAP. Identifying and responding to grievances supports positive relationships between the project and affected groups/communities and other stakeholders.

The EPA-SL demands that the concerns should be addressed promptly using an understandable and transparent process that is culturally appropriate and readily acceptable to all segments of affected communities, at no cost and without retribution. Mechanisms should be applicable to the scale of impacts and risks presented by a project.

Grievances can indicate growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Therefore, the management of grievances is a vital component of stakeholder management and an essential aspect of risk management for a project.

While this Project may have only limited potential adverse impacts to people and the environment in general, identifying grievances and ensuring timely resolution is still very necessary.

Table 13: The grievance management guide

Steps	Process	Description	Time frame	Other information
1	Identification of Grievance	Face to face, phone, letter, email recorded during public/ community Interaction and others	1 day	Email address, hotline and land line
2	Grievance assessed and logged	Significance assessed and grievance recorded or logged (i.e. in a log book)	4-7 Days	Significance criteria level one(1) off event level two(2) complaint is widespread or repeated, level three(3) any complaint (one off or repeated) that indicates breach of law or policy.
3	Grievance is acknowledge	Acknowledgement of grievance through appropriate medium	7-14 Days	
4	Development of response	Grievance assigned to appropriate party for resolution response development with input from management/ relevant stakeholders.	4-7Days 10-14 Days	
5	Response signed off	Redress action approved at appropriate levels	4-7 Days	Senior management staff of Hussien Scrap Metal should sign off.
6	Implementation and communication of response	Redress action implemented and update of progress on resolution communicated to complainant	10-14 Days	
7	Complaints Response	Redress action recorded in a grievance log book confirm with complaint that	4-7 Days	

		grievance can be closed or determine what follow up is necessary.		
8		Record final sign off of grievance if grievance cannot be closed Return to step 2 or refer to Hussien's third party arbitration or resort to court of law	4-7 Days	Final sign off by Director of Hussien Scrap Metal Company

19.0 CONCLUSION

This ESMP report has been documented following both discussion and review of currently available data. Secondly by visits and pre-assessment talk with the community management members.

Hussien Scrap Metal Investment acknowledges that its activities and operations impact the environment, workers, and customers and is very mindful of its obligations towards the protection of the environment and ensure the health and safety of the workers, customers, and the community.

The company will continue to invest in ensuring a safe environment that will assure sustainable operations and continue to undertake its activities and operations in accordance with Environment Protection Agency laws and international best practices governing activities of this nature.

20.0 REFERENCE

- Environmental Protection Agency Sierra Leone (EPA-SL) 2008 amended 2022
- care of the environment –Linus reffuse 2011
- National Commission for Basic Education Act 1994
- Local Government Act 2004
- Education Act 2004
- Sierra Leone Legislation, 2013 & 2014
- United States Environmental Protection Agency, office of solid waste and emergency response (5104). EPA 550-F-97-002d, December 1997, www.

- GoSL.2010a. Millennium Development Goals Progress Report 2010.
- Government of Sierra Leone: Freetown booklet

21.0 ANNEX:

Community Engagement Programme (CEP)

Community engagement is necessary for minimizing or avoiding public controversy, confrontation, and delay; and can make a positive contribution towards the successful implementation of the proposed project. The CEP's overarching objective was to establish consensus and acceptance by soliciting the views and concerns from communities in the project area, the media, and the public.

Objectives of the program were to:

- Disseminate and inform this category of stakeholders about the project with particular reference to its essential components and location.
- Gather comments, suggestions, and concerns of interested and affected parties as well as their proposed solutions and mitigation measures.
- Establish a communication channel between this group of stakeholders on the one hand and the Hussien Scrap Metal Investment on the other hand.

Activities such as interviews, community meetings, and print media were undertaken as part of the CEP to meet the objectives mentioned above.

IMPLEMENTATION PLAN

Given that ESMP has been conducted, including socio-economic surveys, the people's expectations will be raised. It is recommended that the implementation of the CDAP commence simultaneously with the Hussien Scrap Metal Investment project to prevent any unwanted problems.

Community Development Committee

An existing community development committee could co-opt any of the following membership if they are not yet members.

Proposed Membership:

- Member of Parliament for the Constituency.
- The councilor of the entire project area
- Headman
- Women's leader
- Youth leader

- The chiefs/tribal head
- Religious leaders
- The Hussien Scrap Metal Investment Community Relations Officer;

COMMUNITY CONSULTATION FOR HUSSIEN SCRAP METAL INVESTMENT AT MAKOLOH VILLAGE SONGO

In a Consultative Meeting held at Makoloh Village for **Hussien Scrap Metal Investment at Makoloh Village Songo** the Lead Consultant from Green Vital Environmental Consultancy Company **Mr. Clifford Davies** briefed the Stakeholders about the job of the Consultancy Team, and to provide an environmental guide for the project in order to minimize impacts such projects will have on the environment and the people of Makoloh Village. The objective of the business is the purchase scrap metal and copper from mining companies and industries for export.

Alimatu H. Kamara (Councilor) - Thanked God Almighty for such investment happening in their community and she is very happy and grateful for the project. She introduced herself as the **Councilor of Constituency** where the facility will be operating**.** She pleaded with the company to please remember her community people in terms of employment.

Saidu E. Bangura (Head Man)-Thank God for the company, and said he is really happy; men and women will benefit from the company. One good thing he pointed out is that the company decides to operate within their community and that some of their youth will gain employment whilst some will gain skills that will benefit them in the future.

Hassan Mansaray (Head Teacher) - Appeal to the company to please help them in the renovation of their school, clinic and community center.

Henry Sesay (Youth)- The community members have already helped in the educational systems in the community and all they want is the company to help them with Water facility.

Michael Mason- Advised with the community stakeholders/villagers to form a Community Development Committee (CDC) which comprises of the, Councilor, Chief, Head man, Mammy queen and Youth Leader and religious leaders etc.

In that case they can identify their needs and put them forward to the company as it will be stated in the main Community Development Action Plan (CDAP) documents for the betterment of the community.

COMMUNITY CONSULTATION PICS