

GOVERNMENT OF SIERRA LEONE –
MINISTRY OF FINANCE

**ESIA AND ASSOCIATED ESMP
WITH RP FOR THE PROPOSED
UPGRADE OF MAKENI & KENEMA
CENTRAL MARKETS**

**RESETTLEMENT
PLAN (RP) REPORT
FOR MAKENI
CENTRAL MARKET
UPGRADE**

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TABLE OF CONTENTS

Table of Contents	ii
List of Tables	v
List of Figures	vii
List of Acronyms and abbreviations	viii
Glossary	x
Executive summary	1
1. Introduction and description of the project	5
1.1 Background and Project Description	5
1.1.1 Existing Market Location	7
1.1.2 Temporary Relocation Site	10
1.1.3 Description of the Upgraded Market	13
1.2 Project options and alternatives	18
2. Potential Impacts	20
2.1 Defining the Area of Influence	22
2.2 Summary of Project impacts that are expected to occur	23
3. Objectives and processes	32
3.1 Efforts Made to Avoid or Minimise Resettlement	32
3.2 RP objectives and principles	32
3.3 RP preparation process	34
3.4 Completion of a vulnerability analysis	36
4. Census survey and baseline socioeconomic studies	38
4.1 Socio-economic status of Traders	38
4.2 Socio-economic status of Traders' Businesses	44
4.3 Socio-economic status of Workers	47
4.4 Summary of vulnerable people	51
4.5 Socio-economic Status of Customers	52
4.6 Socio-economic status of fixed assets owners	53
5. Regulatory and policy framework	56
5.1 Introduction	56
5.2 National Policy Framework	56
5.2.1 The Resilient Urban Sierra Leone Project Resettlement Policy Framework 2021 ...	56
5.2.2 Sierra Leone's Medium-Term National Development Plan 2024 – 2030	57
5.2.3 National Social Protection Strategy. for Sierra Leone 2022-2026	57
5.2.4 National Land Policy 2005	58

5.2.5	National Land Policy (2005, amended in 2015)	58
5.2.6	National Referral Protocol on Sexual and Gender-Based Violence (SGBV) 2022	59
5.3	Constitutional, Legislative and Regulatory Provisions	60
5.3.1	The Constitution of Sierra Leone	60
5.3.2	Land Tenure and Ownership	61
5.3.3	National Development Induced Resettlement Act 2023	61
5.3.4	Environment Protection Act 2022	62
5.3.5	Sierra Leone Small and Medium Enterprises Development Agency Act, 2016	63
5.3.6	Independent Commission for Peace and National Cohesion Act, 2021	63
5.3.7	Right to Access Information Act 2023	64
5.3.8	National Revenue Authority Act 2022	64
5.3.9	National Land Commission Act 2022	64
5.3.10	Customary Land Right Act 2022	65
5.3.11	The Town and Country Planning Act 1948	65
5.3.12	The Public Health Act 2022	66
5.3.13	The Sexual Offences Act, 2012	66
5.3.14	The Local Government Act, 2022	66
5.3.15	Appropriation Act 2024	67
5.3.16	The Borrowers and Lenders Act, 2014	67
5.3.17	The Traffic Act 2016	68
5.3.18	The Child Rights Act, 2007	68
5.4	International Framework	69
5.4.1	Policy Objectives	69
5.4.2	Similarities Between the Government of Sierra Leone Regulatory Framework, and World Bank's ESS5	70
5.4.3	Differences Between the Government of Sierra Leone Regulatory Framework and World Bank's ESS5	77
6.	Institutional framework	82
6.1	RP Institutional and Implementation Arrangements	82
7.	Eligibility	86
8.	Valuation of and compensation for losses	88
9.	Community participation	90
10.	Site selection, site preparation, and relocation	104
10.1	Site selection	104
10.2	Improvement measures at the relocation site	104
10.3	The process used to relocate Traders and their businesses	107

10.4	The Compensation Agreement	109
11.	Livelihood restoration and transitional support	110
11.1	Livelihood restoration measures	110
11.2	The provision of transitional support	110
11.3	The provision of additional support to vulnerable PAPs	112
12.	Implementation schedule and change management	114
12.1	Schedule	114
12.2	Change management procedure	117
12.3	The management of risks during RP implementation	118
13.	Costs and budget	122
14.	Grievance redress mechanism	124
15.	Monitoring and Evaluation	127
15.1	Objectives	127
15.2	Internal monitoring and indicators to be used	127
15.3	External Monitoring and Evaluation	129
15.4	Data analysis and reporting	130
	Appendices	131
	Appendix A- RP TOR	132
	Appendix B-Collected RP Survey Data	133
	Appendix C- RP Work Plan	134
	Appendix D- RP Survey Questionnaire	135
	Appendix E- Stakeholder Engagement Activities	136
	Appendix F- RP Budget	137
	Appendix G- TOR for the RP Implementation Agency	138
	Appendix H- List of Traders who cannot be accommodated at the Makeni relocation site and who will have to self-relocate to other markets, with their signatures/ fingerprints	139

LIST OF TABLES

Table 2-1 The number of people who are expected to be directly impacted	24
Table 3-1 Vulnerability criteria and justifications	36
Table 4-1 Trader's' gender	39
Table 4-2 Traders' Marital Status	39
Table 4-3 Traders' Educational Status	40
Table 4-4 Trader's' distance to the market, registration, use of childcare arrangements and languages spoken	40
Table 4-5 Traders' household size distribution	40
Table 4-6 Outcome of a vulnerability analysis using the pre-defined criteria	43
Table 4-7 Location of the businesses in the market and outside	44
Table 4-8 Type of Utilities requested by the traders for the upgraded market	44
Table 4-9 Type of structures/objects used by the market traders	45
Table 4-10 Age Range of the Market Workers	48
Table 4-11 Employment Status of the market Workers	49
Table 4-12 Household size distribution of the market Workers	50
Table 4-13 Summary of vulnerable people	51
Table 4-14 Socio-economic status of fixed assets owners	53
Table 4-15 Socio-economic status of fixed assets owners	53
Table 4-16 Status of ownership of fixed assets	55
Table 4-17 Type of utilities connected to the structures	55
Table 5-1 Comparative Analysis of the World Bank ESS5 and the Regulatory Framework of Sierra Leone	71
Table 6-1 Stakeholder roles and responsibilities in RP implementation	82
Table 7-1 Eligibility and entitlement matrix	86
Table 8-1 Valuation methodology	88
Table 9-1 Summary of stakeholder engagement activities	90
Table 10-1 Proposed Relocation site design details	105
Table 11-1 Calculation of Transitional Support for Microbusiness traders to relocate and return to the market site	111
Table 11-2 Calculation of Transitional Support for Small sized Business traders to relocate and return to the market site	111
Table 11-3 Workers Compensation calculation to relocate and return to the market site	112
Table 11-4 Additional support to vulnerable people	112

Table 12- 1 RP implementation Schedule	115
Table 12- 1 Potential key risks and mitigation measures	119
Table 13- 1 RP Budget Summary	122
Table 15- 1 Internal monitoring and evaluation indicators	128

LIST OF FIGURES

Figure 1-1 Photos taken from Makeni market reflecting its poor condition	6
Figure 1-2 Makeni Central Market Location Map	8
Figure 1-3 Photos from the Existing Makeni Central Market	9
Figure 1-4 Campbell Street Market Relocation Site	10
Figure 1-7 Photos from the Campbell Street	13
Figure 1-9 Proposed footprint of the Makeni Market Upgrade (Ground floor)	14
Figure 1-10 Architectural 3D Design of Makeni central market	16
Figure 2-1 Location of temporary construction boundaries (Hoarding area) in light blue surrounding the existing market	21
Figure 2-2 The project's Area of Influence	23
Figure 2-3 The category of the top 10 businesses impacted by product category	27
Figure 2-4 Photo of the Mixed use residential/commercial structure	28
Figure 2-5 Photo of fixed shelves and table	29
Figure 2-6 Photo of Toilet	29
Figure 2-7 Photo of fixed wooden doors privately owned	30
Figure 2-8 Photo of cement wall with steel door privately owned	30
Figure 3-1 Photo of the cut-off sign installed at the market	35
Figure 4-1 Age breakdown of the traders	39
Figure 4-2 Daily income range of traders	42
Figure 4-3 Household Monthly Income range of traders	42
Figure 4-4 Traders' Household debt level	43
Figure 4-5 Space used by the business (m ²)	46
Figure 4-6 Photos taken of the different types of businesses at Makeni Market	47
Figure 4-7 Marital Status of the market workers	48
Figure 4-8 Educational Status of the market Workers	49
Figure 4-9 Languages spoken by the market Workers	50
Figure 4-10 Market Workers' daily salary range	50
Figure 10-1 Trader preferences associated with the relocation site	104
Figure 10-2 Proposed layout for Campbell street relocation site	106

LIST OF ACRONYMS AND ABBREVIATIONS

AOI	Area of Influence
CBO	Community-Based Organization
ELARD	Earth Link and Advanced Resources Development
EPA	Environmental Protection Agency
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESSs	Environmental and Social Standards
FDD	Fiscal Decentralization Division
FGD	Focus Group Discussion
FS	Feasibility Study
FSU	Family Support Unit
GBV	Gender-based Violence
GUP	Grievance Uptake Points
GRC	Grievance Redress Committee
CPIT	City Project Implementation Team
GRM	Grievance Redress Mechanism
GPS	Global Positioning System
MCC	Makeni City Council
M&E	Monitoring and Evaluation
MDA	Ministries, Agencies and Departments
MLHCP	Ministry of Land, Housing and Country Planning
MTNDP	Medium-Term National Development Plan
MoF	Ministry of Finance
MoPED	Ministry of Planning and Economic Development
MWPA	Ministry of Works and Public Assets
NDIR	National Development-Induced Resettlement
NDMA	National Disaster Management Agency
NDP	National Development Plan
NLE	New Leones
NSPS	National Social Protection Strategy
PAPs	Project - Affected Persons

PRSP	Poverty Reduction Strategy Paper
PMU	Project Management Unit
PSC	Project Steering Committee
SGBV	Sexual and Gender-Based Violence
TOR	Terms of Reference
USD	United States Dollars
RP	Resettlement Plan
RUSLP	Resilient Urban Sierra Leone Project
RPF	Resettlement Policy Framework
SDGs	Sustainable Development Goals
WB	World Bank
WBG	World Bank Group

GLOSSARY

The purpose of this Section is to provide a description of the key terms used in the RP. The descriptions are taken from the policy and reference framework applied to the RP described in Section 5.

Term	Definitions and Comments
Adequate housing	Defined by the following criteria: security of tenure; availability of services, materials, and infrastructure; affordability; accessibility; habitability; location; and cultural adequacy.
Area of influence	The area likely to be affected by the project activities and facilities.
Compensation	Payment in cash or in-kind for loss of an immovable asset or loss of access to resources and livelihoods, that is acquired or affected by the project.
Project affected persons (PAPs)	A person experiencing either physical or economic displacement.
Economic displacement	Economic displacement refers to the loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood.
Gender-based violence	Any form of violence, including physical and verbal abuse, related to social and cultural expectations of gender roles and relationships, often for the purpose of sustaining power.
Helper (to a Market trader)	A person who is a relative (child, brother, sister, nephew, etc.) or ward (a child or young person under the care and control of a guardian appointed by their parent) that is not paid by the trader, or an employee of the trader, but is employed by the trader to conduct domestic and other general duties, and does not rely directly on the business for their source of income.
Household	One person or a group of persons who share a dwelling unit, and for a group, share at least one meal a day.
Land acquisition	Land acquisition refers to all methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as easements or rights of way. Land acquisition may also include: (a) acquisition of unoccupied or unutilized land whether or not the landholder relies upon such land for income or livelihood purposes; (b) repossession of public land that is used or occupied by individuals or households; and (c) project impacts that result in land being submerged or otherwise rendered unusable or inaccessible. "Land" includes anything growing on or permanently affixed to land, such as crops, buildings and other improvements, and appurtenant water bodies.
Large-sized business	A business which is operated by more than 10 people.
Livelihood	Livelihood refers to the full range of means that individuals, Households and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, trading and bartering.
Market trader	A person who is the owner of a businesses at the market, selling products.

Term	Definitions and Comments
Market worker	A person who is employed by the owner of a business present at the market, supporting the market trader in the business.
Medium-sized business	A business which is operated by 5-9 people.
Microbusiness	A business which is owned and operated by a single person.
Physical displacement	Physical displacement refers to relocation of PAPs, loss of residential land or loss of shelter.
Replacement cost	Replacement cost is defined as a method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. Where functioning markets exist, replacement cost is the market value as established through independent and competent real estate valuation, plus transaction costs. Where functioning markets do not exist, replacement cost may be determined through alternative means, such as calculation of output value for land or productive assets, or the undepreciated value of replacement material and labour for construction of structures or other fixed assets, plus transaction costs. In all instances where physical displacement results in loss of shelter, replacement cost must at least be sufficient to enable purchase or construction of housing that meets acceptable minimum community standards of quality and safety. The valuation method for determining replacement cost should be documented and included in relevant resettlement planning documents. Transaction costs include administrative charges, registration or title fees, reasonable moving expenses, and any similar costs imposed on affected persons. To ensure compensation at replacement cost, planned compensation rates may require updating in project areas where inflation is high or the period of time between calculation of compensation rates and delivery of compensation is extensive.
Restrictions on land use	Restrictions on land use refers to limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the project. These may include restrictions on access to legally designated parks and protected areas, restrictions on access to other common property resources, and restrictions on land use within utility easements or safety zones.
Security of tenure	Security of tenure means that resettled individuals or communities are resettled to a site that they can legally occupy, where they are protected from the risk of eviction and where the tenure rights provided to them are socially and culturally appropriate. In no event will resettled persons be provided tenure rights that are in effect weaker than the rights they had to the land or assets from which they have been displaced.
Small-sized business	A business which is operated by 2-4 people.
Vulnerable groups	People who may be more likely to be adversely affected by project impacts and/or more limited than others in their ability to take advantage of a project's benefits as a result of their race, colour, sex, language, religion, political or other opinions, national or social origin, property, or birth.
Helper (of a trader)	A person who is supporting the trader to operate the business, usually a relative or a friend
Worker (of a trader)	A person who is (formally [written contract] or informally [verbal contract]) employed by the trader for the sole purpose of supporting the trader operate the business, and who relies on the business for their source of income. Workers were divided into a Worker who: (a) works exclusively for the trader and they are paid a fixed wage

Term	Definitions and Comments
	monthly/daily; or (b) works for multiple traders and, in return, gets paid by each of them varied rates per day or week/month.

EXECUTIVE SUMMARY

As part of the Resilient Urban Sierra Leone Project (RUSLP), subcomponent 2c will upgrade the central market in Makeni, to improve working conditions for traders, stimulate local economies and provide the city council with increased revenues through increased collection of market dues to finance council operations.

Makeni Central Market occupies an area of about 3,240m² and is owned by the Makeni City Council. It caters for 2,745 traders as per the socio-economic census conducted in September 2023, among which 85.5% are females and the remaining 14.5% are males. These traders are located inside the market and the area surrounding it.

A Resettlement Plan (RP) was prepared in accordance with the Sierra Leone legal framework and WB Environmental and Social Standard (ESS)5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement. Key differences between national legislation and ESS5 were identified and these include the provision of resettlement assistance including transitional support and livelihood restoration measures, the need for specific engagements to be undertaken with women and vulnerable people, the availability of a grievance redress mechanism, and monitoring and evaluation indicators to track progress of the RP, and steps were taken during preparation of the RP to address these differences, where necessary to do so.

The RP includes details of the eligibility and entitlements of traders and workers. Traders who privately own assets such as fixed tables and shelves will be entitled to compensation of these structures at full replacement cost (this is where the physical depreciation of the asset is not taken into consideration during evaluation of the asset), the affected traders will be provided with transportation and transitional support to the relocation site and after reinstatement in the completed facility. Workers will be entitled to transitional support in the form of a cash payment whilst the business relocates. Vulnerable people will be provided with additional support during RP implementation to support the PAP, which reflects their specific source of vulnerability. A total of 630 traders and 12 workers possess at least a single source of vulnerability (642 in total).

The RP describes the process to be used to relocate traders from their existing position in the market which is already divided up into discrete zones by the MCC, and then back again to the upgraded market after the works are completed, which are expected to last up to 2 years. The relocation process has been extensively discussed with MCC, representatives of the traders, and a selection of traders to ensure that it is fair, equitable, transparent, and acceptable to MCC and traders. Initially, three sites were identified and selected to be used as temporary relocation sites for the affected traders; these are: (1) a 3km section of Campbell Street which is a short walk (3-4 minutes) from the existing market; (2) Sesay Market which is around 15 minutes' walk and 1.2 km distance, and (3) Teko Market situated 3 km southeast from the Makeni market (30 to 40 min walk). However, at the final stage of the relocation site design, it was decided to retain Campbell and Savage Street relocation site only for the relocation of traders, but the outcome of the RP survey reveal that the traders are unwilling to go to Sesay Street and Teko Markets. Therefore, Campbell Street is the only relocation option. Savage Square is a road which connects the existing market and Campbell Street; hence, it is considered as part of Campbell Street site; details about the site and the works required to prepare it for the arrival of the traders, are described and budgeted in the RP. The temporary relocation site was selected by MCC and the traders' preferences associated with the alternative sites were gathered during a socio-economic

survey conducted in May-June 2024. The relocation site will host around 1,300 traders; the remaining traders will find spaces in other markets across the city. These 366 traders sell goods — such as cosmetics, salon products, electronics, etc. — that are difficult to accommodate at the relocation site due to their nature and the site's arrangement. However, these traders will be provided with additional support (or an "additional compensation package") in addition to the transitional support, to enable them to self-relocate to other markets in the city.

The outcome of the initial socio-economic surveys for the RP undertaken in September 2023 revealed that a total of 1,580 traders are located inside the market building, and the design of the Market upgrade will therefore need to account for them. The May-June 2024 census indicated that a total of 1,654 traders (a slightly larger number which takes into consideration the presence of traders outside the building in the immediate area where construction works will take place), along with 44 workers (essentially staff employed formally or informally by traders to run their businesses), which equates to 1,698 Project Affected Persons (PAPs). The total number of persons in the households of traders and workers, whose standard of living could be potentially indirectly impacted by relocation, is 9,286.

Traders' businesses have been categorised according to the number of people involved and there are 1,619 micro-businesses (where there is just a single person selling) and 35 small sized businesses (2-4 people involved). There were no medium or large-sized businesses identified during the RP census. In addition to traders and workers, helpers are also present who support the operation of the business, although these do not have their incomes directly linked to the businesses they help. On this basis, only traders and workers are entitled to economic support during the relocation time (initially to the relocation site and then back to the upgraded market after the upgrade is completed).

In addition to the loss of income as traders relocate, impacts will occur from the loss (demolition) of several fixed assets that are owned privately and not by MCC. These comprise a single residential house connected structurally to the market which will need to be demolished, cement walls and shelves, tables, and other assets. All these assets have been surveyed and valued in accordance with the ESS5 principle of full replacement cost.

The cut-off date was defined as 10 June 2024 when the asset inventory survey was completed, and posters were displayed inside the market, requesting all traders to register (if not already registered) with MCC before the cut-off date, and to be informed and participate. The purpose of the cut-off date was also verbally presented to traders to ensure that persons with low levels of literacy also understood the content of the posters.

The RP survey aimed to determine the pre-displacement socio-economic status of the traders and their households, and to also identify sources of vulnerability using pre-defined vulnerability criteria. The survey was also used as an opportunity to gather traders' perceptions of the suitability of the relocation site they would choose (it was made clear to them that this was not a promise, just a data gathering exercise), their comments on the design of the upgraded market, and the type of livelihood restoration measures that would be useful to enhance the way in which their business operates. The feedback on the design was extremely positive with stakeholders consistently urging MCC to start the RUSLP upgrade works as soon as possible. Stakeholders also agreed with the process to be used to relocate

traders as stated above, to a pre-defined position at the relocation site and the upgraded site, to avoid traders competing for positions which could be a trigger for conflict.

Traders and their workers will be entitled to receive (in accordance with the eligibility and entitlements matrix) income support during the period when their businesses are relocated, to ensure that they are able to maintain their standard of living. The duration of time when they are to be provided with this support has been discussed with the traders' representatives and a selection of traders and the amount was calculated using the reported average daily income of the traders and the daily wage of the Worker, ensuring at all times that this is above the minimum daily wage required as per national minimum wage legislation.

The outcome of the RP survey, which included focus group discussions with traders, also covered the type of livelihood restoration measures that would be useful. Specific measures identified include the provision of financial literacy training, marketing and business planning, and others. All of these measures will support traders to enhance their business activities in the future and will also assist in the collection of monitoring and evaluation data as traders become more skilled in financial literacy and will be able to record their business revenue, costs, and profit, with much greater accuracy.

The PMU is responsible for managing a Grievance Redress Mechanism that was always available during the surveys and engagements undertaken during RP preparation. The same mechanism will be available during RP implementation. To date (as of end October 2024), no grievances have been received.

The RP further stipulates roles and responsibilities of each party responsible for implementation of this RP giving the RP implementation Committee, which will be established by the PMU before the start of RP implementation, a leading role in the implementation process. . It will be composed of representatives from the main ministries involved in the project. It will centrally coordinate and undertake the external monitoring and evaluation activities during the resettlement process.

In coordination with the RP implementation Committee, the RP implementation Agency will have the following functions:

- Monitor (internally) RP implementation and progress and engage directly with the PAPs;
- Supervise the compensation payment process, the provision of transitional support, and implementation of livelihood restoration measures as applicable;
- Provide training and capacity building for all entities involved in the RP implementation;
- Take the lead in raising awareness, recording, investigating and resolving grievances concerning RP activities; and
- Coordinate with concerned government agencies and other stakeholders.

In accordance with ESS5, a monitoring and evaluation framework, including internal and external monitoring, has been established using key performance indicators to track future implementation of the RP.

The RP budget has been calculated at **26,322,166 NLE (1,164,697 USD)**, which includes a contingency of 15%. Implementation of the RP is the responsibility of the PMU and it is expected to take 6 months to relocate traders to their designated relocation site, and then a further 6 months to relocate the traders a second, and final time after market upgrade works are complete.

1. INTRODUCTION AND DESCRIPTION OF THE PROJECT

1.1 BACKGROUND AND PROJECT DESCRIPTION

According to the WBG Sierra Leone Poverty Assessment issued in December 2022¹, Sierra Leone has experienced a rapid urbanization rate of growth during the last five decades, with the proportion of the population living in urban areas doubling between 1967 (21%) and 2022 (43%). The report notes that though the number of private sector jobs increased in urban areas, many of them are non-wage low-productivity jobs in retail trade and to a lesser extent in transport, construction, and food services. Population growth is exacerbating pressures on the urban economy, as the number of youths entering the labour force is growing rapidly. Low investment in urban infrastructure may be constraining economic growth in cities and towns and, consequently, improvements in welfare.

Within this context, the Government has requested the World Bank's support to improve urban management and disaster resilience in Sierra Leone. The Resilient Urban Sierra Leone Project (RUSLP) is designed to address comprehensively, the multidimensional urban development challenges and disaster risks of the country, with the aim of achieving liveable, safe, financially sustainable, and productive urban centres in the Western Area (Freetown peninsula) and 6 secondary cities of Sierra Leone.

To improve local public service delivery and access to resilient infrastructure, the project (subcomponent 2c of the RUSLP) will upgrade the Makeni central market, to improve working conditions for traders, stimulate local economies, and provide city councils with increased revenues through increased collection of market dues to finance council operations.

The Makeni market was selected to be upgraded based on a feasibility study (29/03/2024 Revision 3- MK_XX_RG01_23_5188_OK_AG.DOCX) for the central market and the application of the following criteria:

- The upgraded market's future contribution to local economic development;
- Cost-effectiveness;
- State of existing services and connections; and
- Site suitability for the upgrade works to be implemented.

The existing central market at Makeni lacks water, electricity, proper toilets, ablution and storage facilities, pavements, and adequate roofing. During periods of heavy rain, it often becomes flooded and is not accessible by people with physical disabilities or additional mobility needs. The upgrade of the market will include several measures to reduce the risk of flooding and provide a high-quality market setting for traders and their workers/helpers. Traders based inside the market are currently divided up into 8 different zones, and these zones will be used to maintain the social cohesion amongst traders as they relocate in the future.

Examples of photos that reflect the poor condition of the market are provided Figure 1-1.

¹ World Bank Group. Sierra Leone Poverty Assessment: Poverty Trends, Development, and Drivers. 15 December 2022. Available at: <https://www.worldbank.org/en/country/sierraleone/publication/sierra-leone-poverty-assessment-poverty-trends-development-and-drivers>

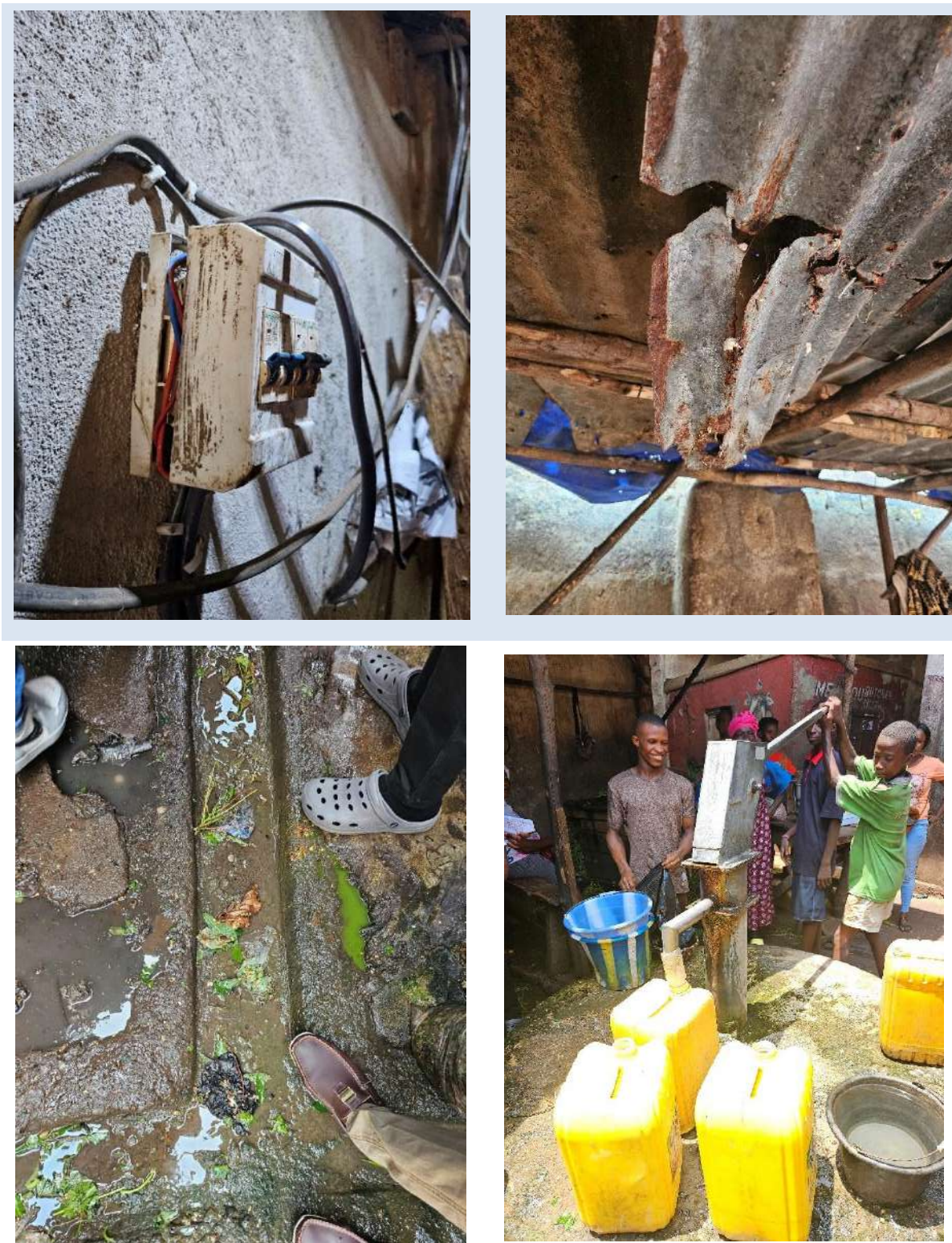


Figure 1-1 Photos taken from Makeni market reflecting its poor condition

The current RP report was prepared in accordance with the approved RP ToR which is presented in Appendix A.

The scope of the RP comprises the activities which are summarised below (a more detailed description is provided in Section 10):

- The preparation of a temporary market at a relocation site to provide space and suitable facilities for traders and their workers to relocate to another temporary location and continue operating their business, whilst the existing market is upgraded;
- The gradual relocation of traders, their business products and mobile equipment (such as tables and umbrellas, etc.) to a pre-allocated location at the designated relocation site, whilst at the same time, installing fencing at the existing market area so that new traders do not attempt to occupy the space left. This will continue until the entire project site is fenced;
- The completion of civil works at the existing market site whilst traders continue to operate their businesses at their designated relocation site; and
- The gradual relocation of traders, their business products and equipment back to a pre-allocated position in the upgraded market, so that they can continue their business in an improved setting for themselves, and their customers. When the final group of traders has relocated from the temporary market areas, upgrade works will be undertaken at the temporary relocation site to enable the land use to return to its pre-existing condition, or other type of status required by MCC. The MCC has informed ELARD and the PMU that the relocation site will not be used as a market area after the traders have returned to the market, which means the structures at the relocation site will be demolished after relocating the traders to the upgraded facilities.

The actual process to be used to group traders together and relocate them gradually into the temporary market is complex and has been the subject of several stakeholder consultation meetings during preparation of the RP. Additional information is provided in Section 9 that reflects how this process has been agreed to be undertaken and verified using an engagement-led approach.

1.1.1 Existing Market Location

Makeni Central Market holds the distinction of being the largest market in the northern region, drawing customers from across the entire region. Situated in the Northern Province of Sierra Leone, Bombali District, Makeni Town, the Makeni Central Market is approximately 100m from the Makeni Clock Tower and less than 1km away from MCC's offices. The market area is enclosed by Church Street, Campbell Street, and Station Road, lying in a geographical centre location of Latitude 08° 53' 17'', and Longitude 12° 02' 34'' (source: Feasibility Study report). The market is a central hub for the city's economic activities and plays a vital role in the Northern Province.

The market occupies an area of 3,240m² and is characterised by traders who are situated both inside the physical boundary of the market, and areas adjacent and outside of the market structure, some of whom will be impacted by the construction works. Based on the census conducted in September 2023, the total number of traders in Makeni Central Market who are to be provided with a selling space in the upgraded market is 1,580 traders, which reflects the recorded number of traders currently located inside the market. Those traders

who are currently outside the market but will have been relocated due to the construction works, will be able to relocate to the same (or similar) position once the works are completed.

All the current market land is owned by MCC who have constructed several structures including a roof area and stalls. Traders are registered with MCC. Due to the limited available space, some traders make use of nearby private land and pay the owners of such land for the area they use for selling, and this arrangement extends to the outer boundary of the market beyond its official limit.

The market is operated throughout six days a week (although Sunday serves as a holiday/day of rest for some traders) and there is no specific operational timeframe, as traders manage their businesses at their own time. The existing market faces challenges, lacks essential facilities such as sanitation, storage, adequate space, electricity, a paved floor, and disability-friendly infrastructure, causing inconveniences for both traders and customers. The roads surrounding the market (Koroma Street and Masuba road) are in relatively good condition and easily accessible by cars and motorbikes.

A Google Earth image of the Makeni Central Market is illustrated in Figure 1-2. The red line boundary reflects the outer boundary of the physical structure of the market and many people can be observed in the general vicinity of the structure who comprise traders, workers, and customers passing through.

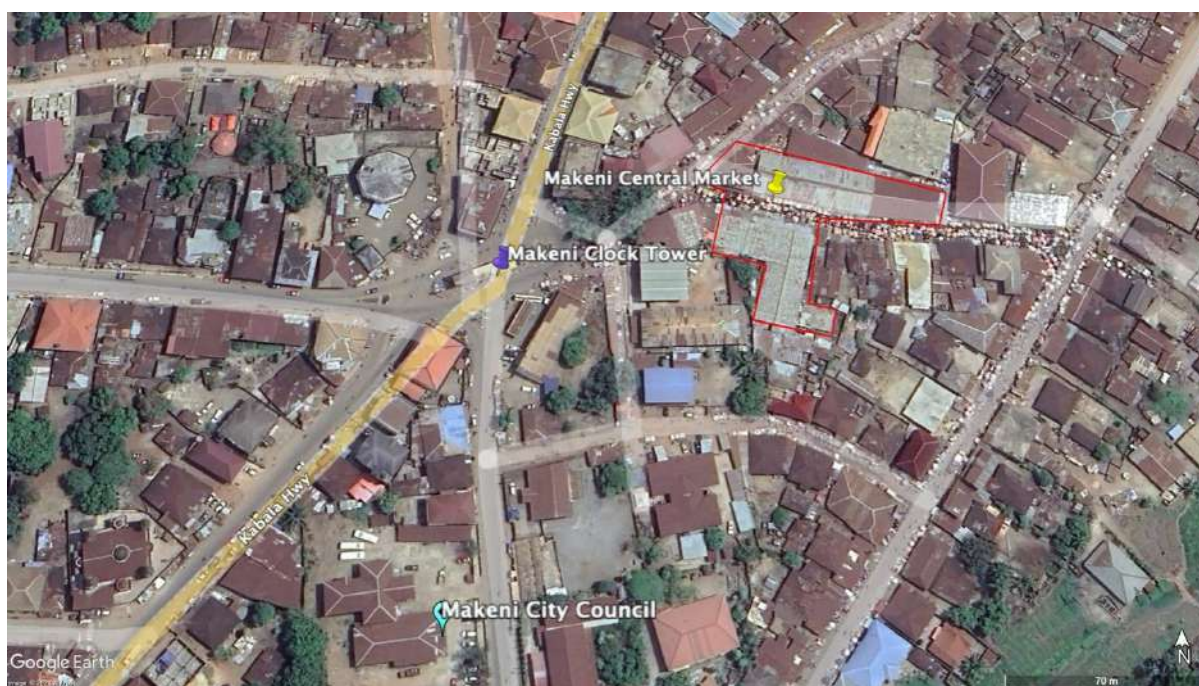


Figure 1-2 Makeni Central Market Location Map

Source: Google Earth, 24 July 2024

Figure 1-3 presents photos taken during the field survey conducted at the Makeni City Market.



Figure 1-3 Photos from the Existing Makeni Central Market

1.1.2 Temporary Relocation Site

Initially, three sites were identified and selected to be used as temporary relocation sites for the affected traders; these are: (1) a 3km section of Campbell Street which is a short walk (3-4 minutes) from the existing market; (2) Sesay Market which is around 15 minutes' walk and 1.2 km distance, and (3) Teko Market situated 3 km southeast from the Makeni market (30 to 40 min walk). However, at the final stage of the relocation site design, it was decided to retain Campbell and Savage Street relocation site only for the relocation of traders, but the outcome of the RP survey reveal that the traders are unwilling to go to Sesay Street and Teko Markets. Therefore, Campbell Street is the only relocation option. Savage Square is a road which connects the existing market and Campbell Street; hence, it is considered as part of Campbell Street site.



Figure 1-4 Campbell Street Market Relocation Site

Source: JV Politecnica & ISC, 2024

Campbell and Savage streets are predominantly occupied by a mix of residential and commercial buildings. The total length of the two streets is approximately 1.5 km, with an average width of 9.0 meters. Campbell Street is paved with asphalt, while Savage Street remains unpaved. Both streets are conveniently situated near the Central Market of Makeni, where street trading is common. Campbell Street, in particular, is heavily utilized by traders, leading to traffic congestion during the day.

The temporary relocation site was chosen through consideration of the following:

- The scarcity of available suitable sites that could host the PAPs within the city boundaries;
- The need for sufficient available space, infrastructure, and utility connections to be available for the existing traders, workers, and their customers so that traders can continue operating their business whilst the civil works at the central market are undertaken;

- The need for the relocation site to be situated as close as possible to the existing market to avoid a loss of customers, total disruption in business activities due to challenges of attracting customers, which will lead to income loss to the traders; and
- The need to ensure a safe space for traders, workers and their customers. Consequently, although road vehicles are currently able to access Campbell Street, this will be prohibited upon initiation of the relocation process to provide a safe space for the temporary market.

The land to be used at the relocation site is public land, and the road sections under the governance of the Sierra Leone Roads Authority Right of Way. The MCC Chief Administrator and the Mayor of the MCC confirmed that there are no claims of land ownership within the physical footprint of the relocation site.

Figure 1-5 presents photos taken during the field survey conducted at Campbell Street relocation site.







Figure 1-5 Photos from the Campbell Street

The relocation site requires preparatory works to ensure that it is suitable for the entry of the relocated traders, and these are described in Section 10. The costs of undertaking the preparatory works are reflected in both the RP implementation schedule (Section 12) and the RP budget (Section 13).

It must be noted that the relocation site will only host 1,300 traders; the remaining traders will find spaces in other markets across the city. Based on surveys and engagement with traders, there are 366 traders who sell goods — such as cosmetics, salon products, electronics, etc. — that are difficult to accommodate at the relocation site due to their nature and the site's arrangement. Till date, 308 (out of 366) affected traders have been engaged by the MCC and the Traders' Union Executive, and they expressed their will to find spaces in other markets across the city. However, these traders requested additional support in addition to the transitional support that will be provided to them in particular.

1.1.3 Description of the Upgraded Market

The purpose of this section is to provide a summary of the upgraded market using the preliminary design documents. It is estimated that the time period between the start of upgrade works, and the start of the process to relocate traders back to the upgraded market, is approximately 2 years.

The upgraded market, covering an area of 3,240 m², will consist of two separate buildings (blocks), designed to host around 1,580 traders in total, featuring G+1 type buildings. The trader capacity is estimated at 362 traders on the ground floor and 500 traders on the first floor in both blocks, assuming one trader per stall. However, the total capacity could reach 1,724 traders if each stall is occupied by two traders.

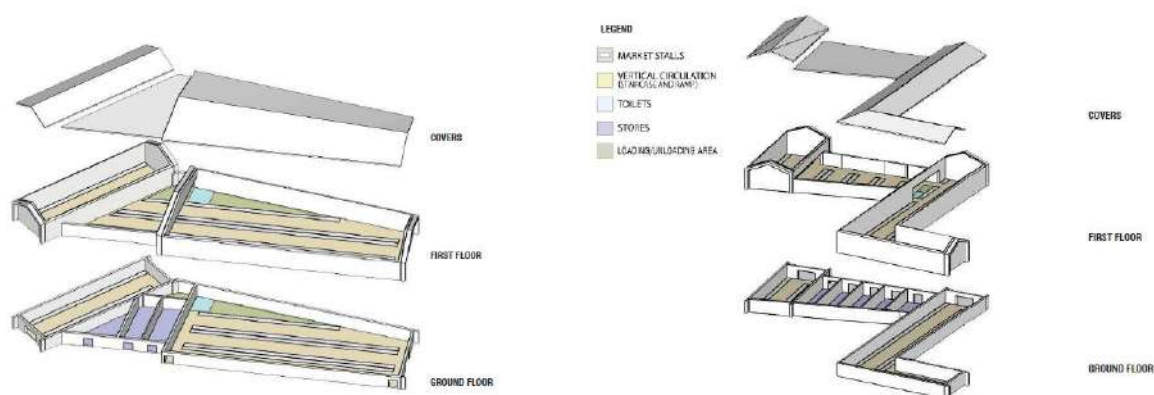
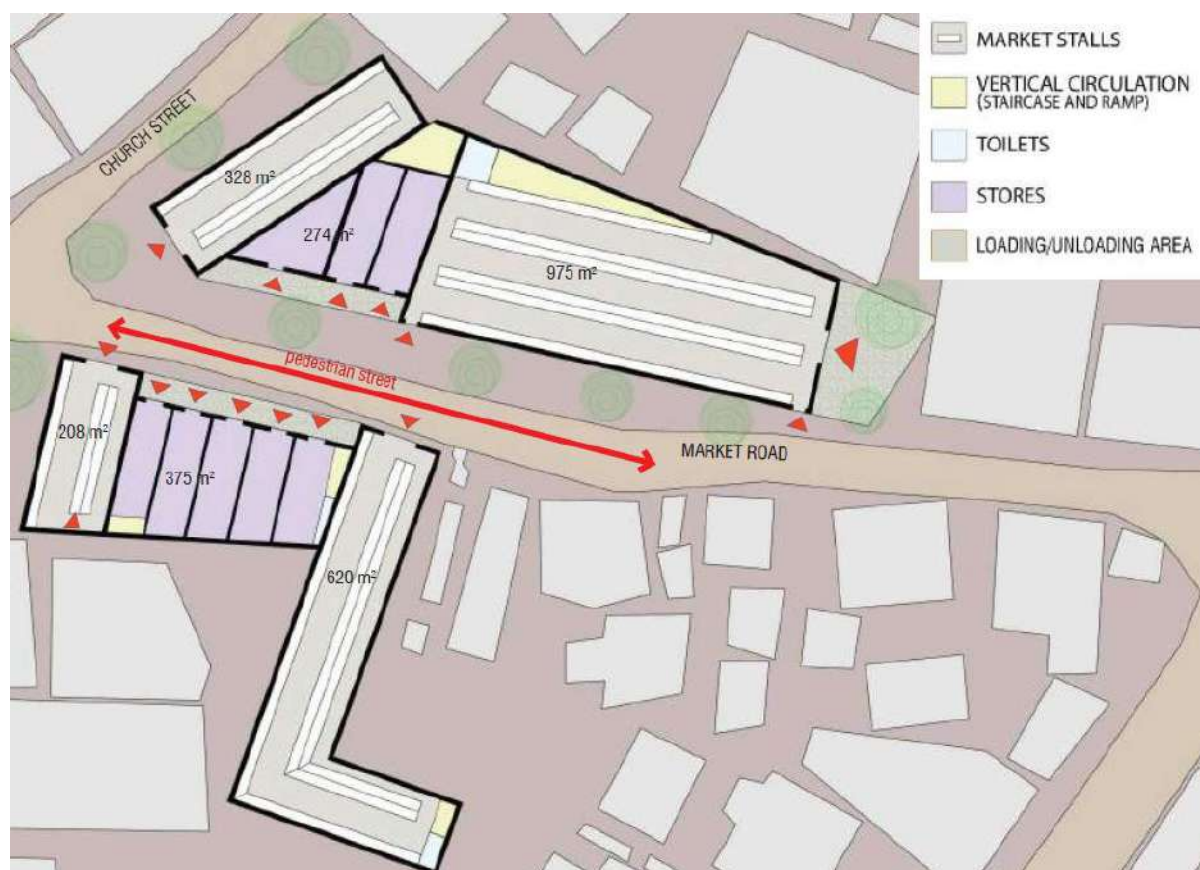


Figure 1-6 Proposed footprint of the Makeni Market Upgrade (Ground floor)

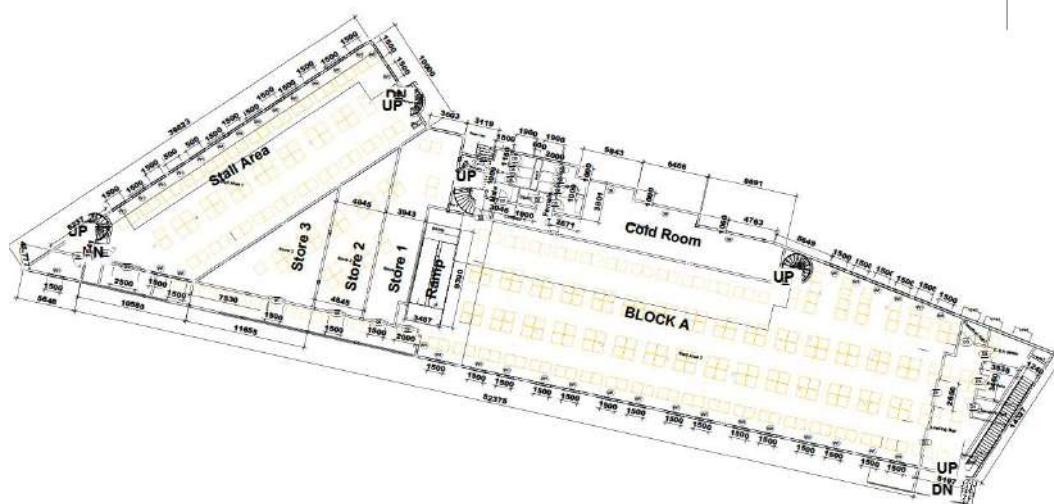
Source: JV Politecnica & ISC, 2024

Referring to the Preliminary design document, the upgraded Makeni central market consisting of two Block A and B, each comprising two floors (Ground + 1), will have the following components:

- **Market Stalls (1572):** A basic model of 5 m² is proposed which can be used by 2 traders. Each unit measures 5x2 meters with an area of 10m². Each 10m² stall is divided into two 5m² segments, which will be shared by two traders. The circulation path between stalls differs, with some stalls structured in arrays and others positioned

individually. The corridors range from minor paths at 1.5 meters wide to major passageways that are 3 meters wide.

- Stores: 8 stores, 65 m² for each store, at the ground floor level, 3 in Block A and 5 in Block B.
- The design incorporates essential services and common areas. These include but are not limited to:
 - ✓ Washrooms
 - ✓ Loading and unloading bays
 - ✓ Residual space
 - ✓ Cold Rooms
 - ✓ Plant Room
 - ✓ Security Post
 - ✓ Janitors Room
 - ✓ Healthcare center.
- Architectural considerations: The Makeni central market upgrade design incorporates key features such as amenities, storage provisions, trader capacity, and site-specific considerations. The design includes stepped and ramped entry/exit points, enclosed staircases that follow egress and fire safety requirements, and street-facing retail units with roll-up doors for efficient loading and unloading operations. The daycare space has been converted into stall space. This decision was made following the traders' agreement to remove the daycare facility, as they anticipated that future demands would make it difficult to afford the service. The market design includes ramp and stairs, a medical room, sanitary facilities with disabled accessible WC facilities, a hot and cold-water plant room, a dedicated cold room, a security post, a janitor's room and overhead storage spaces. Figure 1-7 illustrates the architectural 3D design of Makeni central market.



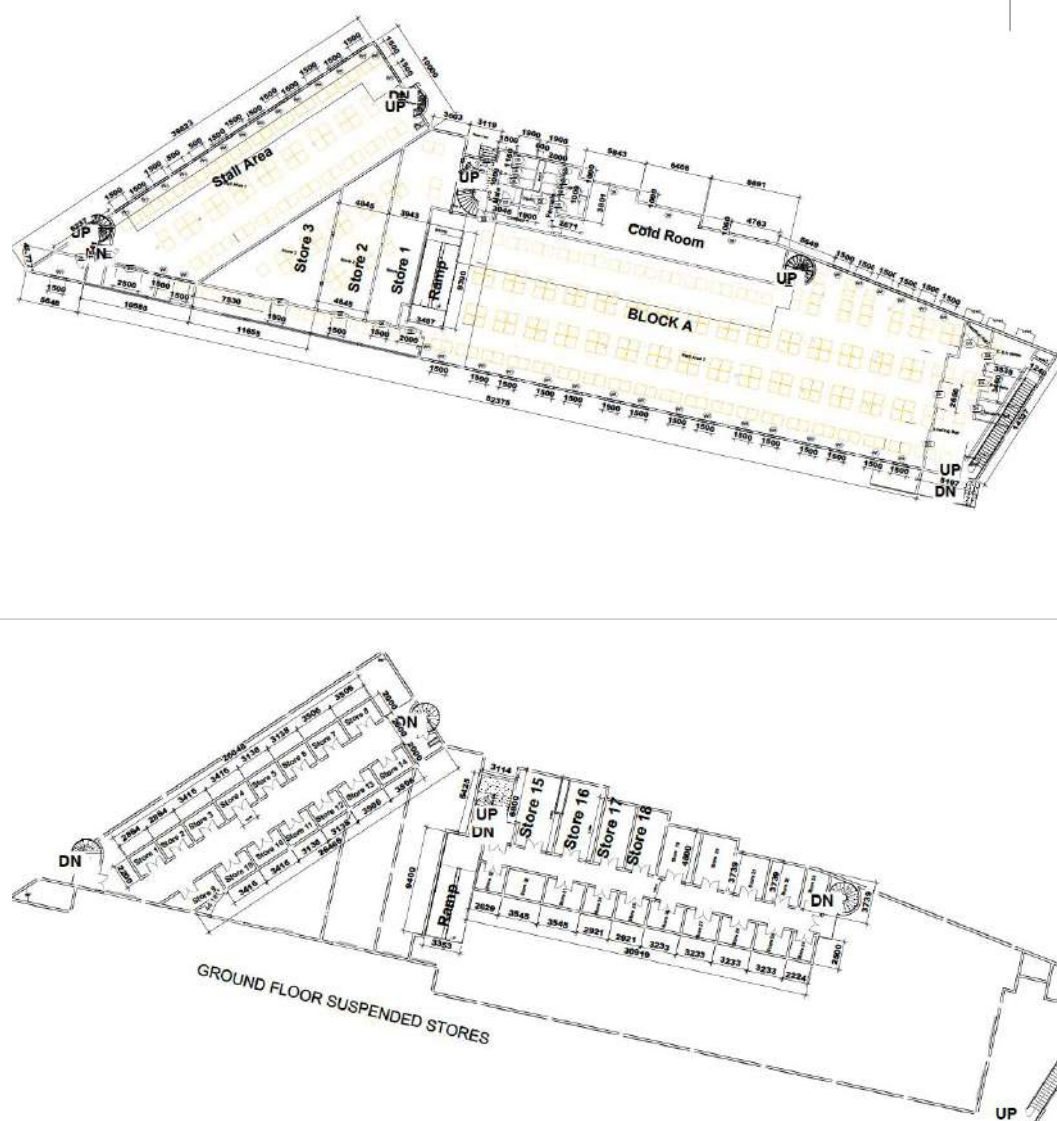


Figure 1-7 Architectural 3D Design of Makeni central market

1.1.4. Relocation Site Components

The Makeni relocation process involves the development of Campbell Street/Savage Square. The relocation plan considered 2 design options, presented in 1, featuring open-plan, single-floor sheds made from composite materials like timber, concrete, and zinc. The major difference between the options lies in the proposed design materials and Option 2 was selected since it offers a more secure and safe design.

Table 1-1 The Two design options planned for the Makeni Relocation Site

Option 1	Option 2
----------	----------

Option 1	Option 2
This option uses timber frame structure with zinc covering the entire surface, including the sides and roof	This option uses a composite design of timber, zinc, and concrete to provide more durable, safe, and secure sheds for the relocation market.
This design is the most Cost-effective, but it raises significant safety concerns. The use of zinc to cover the sides of the sheds poses safety risks for the market stall area	This option has the same layout, capacity, and amenities as Option 1 but offers a more secure and safe design. The dwarf walls for Site 1 along Campbell Street and Savage Street are designed using timber materials, while the dwarf walls at Sites 2 and 3 are designed using brick walls for the enhanced safety of traders and workers, and increased security (against vandalism and theft). The columns are designed using timber and concrete materials to enhance the structural integrity of the temporary sheds.
All stalls are constructed using timber materials.	All stalls are constructed using timber materials.
This option utilizes timber and zinc for the store sheds.	This option features timber and zinc for the store sheds.
This option does not provide washrooms and water facilities at any of the three sites in Makeni City due to space constraints.	This option does not provide washrooms and water facilities at any of the three sites in Makeni City due to space constraints

Source: JV Politecnica & ISC,2024

Architectural 3D Design of Makeni central market

Source: JV Politecnica & ISC, 2024

The proposed facilities at the relocation site will be as follows:

Market stalls: A basic model of 5 m² is proposed which will be used by 2 traders. The circulation paths between stalls vary, with some arranged in rows and others positioned individually. The corridors range from narrow paths, 1 meter wide, to wider passageways, 2 meters wide. All stalls are designed using timber materials.

Stores: Due to space constraints and the characteristics of the relocation site, no store facilities are provided at Campbell & Savage Street.

Services and common areas: For the proper functioning of the market relocation site, various aspects essential to supporting the relocated communities were assessed, including available infrastructure, facilities, services and land use. Essential services necessary to support traders' activities and ensure smooth operations and a conducive environment for commerce at the relocation site were found to be absent and needed to be ensured before relocating the traders. The required services are shown in Table 1-2.

Table 1-2 Services required at the relocation site

Service	Campbell Street
Electricity Supply	x
Cold Room	x
Security post	x
Toilet Facilities	x
Clean Water Supply	x
Selling Space	x
Stores	x
Cover for sunlight and rain	x
Drainage facility	

Source: JV Politecnica & ISC, 2024

The selected option has been planned to include 26 market sheds accommodating approximately 1,300 traders; 20 sets of mobile toilets with tanks to aid the supply of water to the toilet facilities; 36 movable dust bins; and 1 solar-powered borehole that will serve as the primary source of water (I). The toilets will be installed in accessible areas along the Campbell Street and Savage Street; these will be located a few meters away from the market sheds along the street. Due to space constraints, there will be no specially designed toilets for the disabled persons.

It is worth noting that 366 traders sell goods — such as cosmetics, salon products, electronics, etc. that are difficult to accommodate at the relocation site due to the nature of their goods and the site's arrangement. These traders will be provided with additional support (or an “additional compensation package”) in addition to the disturbance allowance, to enable them to self-relocate to other markets in the city.

1.2 PROJECT OPTIONS AND ALTERNATIVES

The following project options and design alternatives were considered to minimize resettlement impacts:

Option 1 – No development. This option was not selected as the existing condition of the market is poor due to the reasons stated above such as leaking roofs, poor sanitation, and the need to improve waste management and the quality of the experience by customers.

Option 2 – Redevelopment. This option was selected due to the factors explained above although it was not possible to divide the upgrade works into different phases, as the entire structure needs to be demolished and rebuilt. However, within Option 2, there were a variety of alternative designs which were explored. The alternative designs include the following factors:

- The number of floors of the market which would increase the total area available for traders, but would also increase construction costs with number of floors added.
- The layout of the market and allocation of space for 1,580 traders.

Alternative relocation site

The provision of relocation sites was the responsibility of the MCC in due consultation with all relevant stakeholders, including traders; the Council initially allocated a site which is about 200 m North from the current market, which was rejected by the PMU and WB because it is a wetland that also lies on a flood plain. The Trader's Union also offered a parcel of land equidistant SE of the market, which also had the same characteristics/issues as the aforementioned land. Additionally, a site at Turn Table market was proposed; however, it was discounted as the market is already fully occupied by existing traders and will not be able to accommodate additional traders from Makeni Central Market. As a result, three sites were retained: Campbell Street, Sesay Street, and Teko Street. However, the final decision was to retain the Campbell Street – Savage Street as the only final relocation site for space and overcrowding constraints, and since the other two sites require considerable work in order to be ready to host the traders, besides being relatively distant from the existing market.

2. POTENTIAL IMPACTS

The potential impacts from the project are described in this section and reflect the temporary imposition of construction fences that are to be installed to provide a safe and empty area for the civil works to be conducted. The potential impacts also reflect those associated with the access route to be used by the civil works contractor at the existing market, so that they can move in/out of the existing market without being hindered.

Note that prior to the start of traders relocating, a pre-entry assessment will be undertaken at the relocation site to check that the temporary position of tables, fixed roof structures, etc. will not impact any existing users and, where this may occur, undertake necessary steps to avoid/minimise the impacts on existing traders to the extent possible. The key aim of the pre-entry assessment is to prevent additional traders from being economically displaced.

The location of the construction fence boundaries around the Makeni existing market is illustrated in Figure 2-1 which includes the designated access road that connects to the main highway.

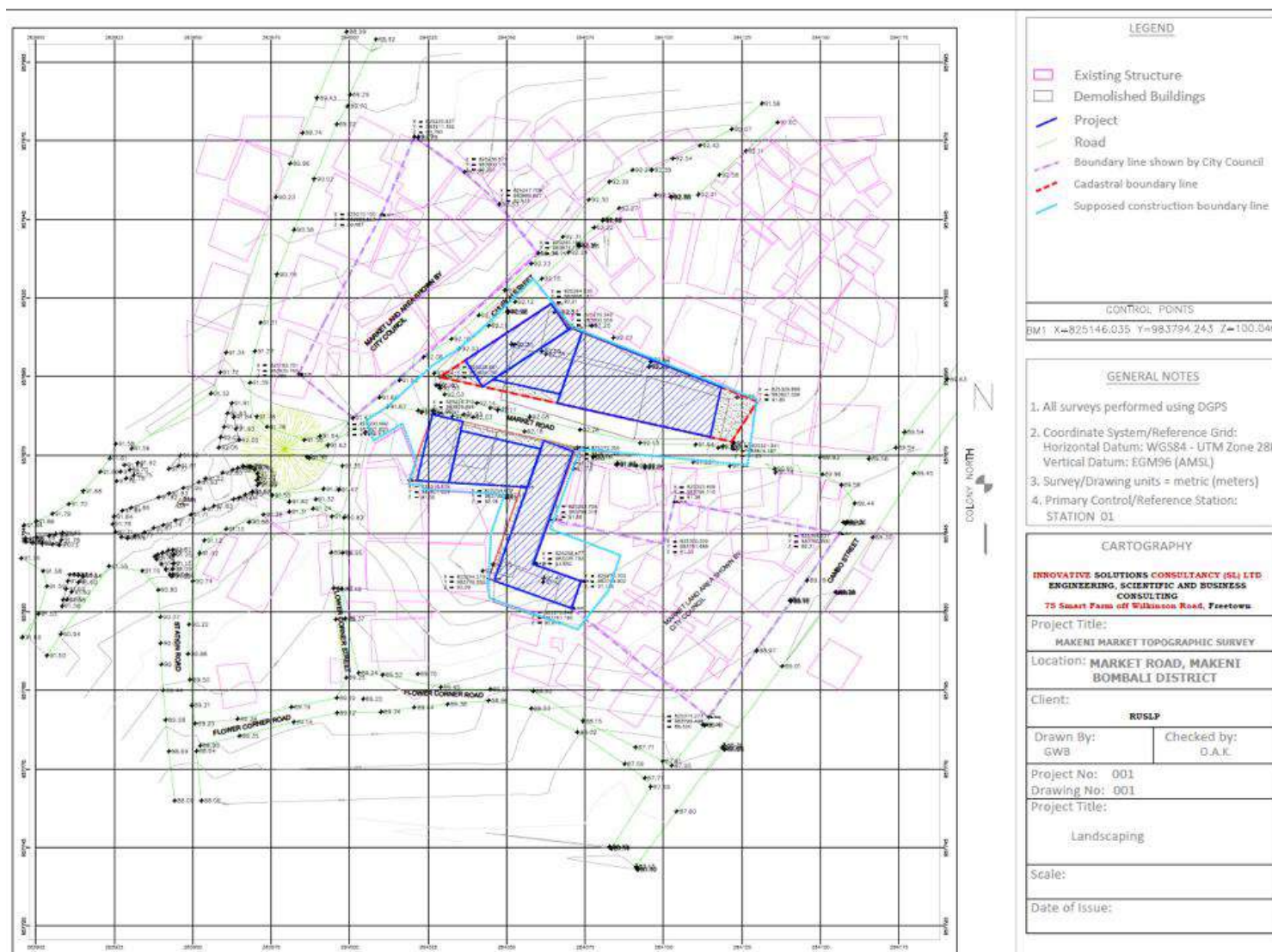


Figure 2-1 Location of temporary construction boundaries (Hoarding area) in light blue surrounding the existing market

2.1 DEFINING THE AREA OF INFLUENCE

The area of influence (Aol) of the project was defined based upon the following:

- The location of the temporary construction fences within which traders and customers will not be able to gain access to whilst the civil works are ongoing;
- The location of traders who are immediately adjacent to the construction fences and who will be exposed to the generation of noise and air emissions, thus requiring their temporary relocation.
- The location of the relocation site (Campbell Street and Savage Street);
- The surrounding sections of road to Campbell Street and Savage Street which are to be closed for vehicular traffic, potentially leading to increased road congestion at the surrounding sections of road;
- The other markets in the city to which the 366 traders who cannot be relocated to Campbell/ Savage Streets might choose to relocate (these traders are likely to be distributed among several markets throughout the process);

Considering the above, the Aol was subsequently defined as: (1) the physical footprint of the market and the immediate outer area where construction fences are to be installed; (2) the relocation site; and (3) the other markets in the city to which the 366 traders who cannot be relocated to Campbell/ Savage Streets might choose to relocate.

The Aol is illustrated in Figure 2-2 which includes the hoarding area at the central market and the Campbell Street and Savage Street relocation site. But it excludes the other markets to which the 366 traders who cannot be relocated to Campbell/ Savage Streets might choose to relocate, since these are not known at this stage.



Figure 2-2 The project's Area of Influence

2.2 SUMMARY OF PROJECT IMPACTS THAT ARE EXPECTED TO OCCUR

This section presents details of the project impacts that are expected to occur. The information is derived from a combination of a census conducted on traders, workers, helpers, and a selection of customers that was undertaken in May and June 2024 (Section 3.2). The collected data files are attached to this report as Appendix B.

This information uses a categorisation of businesses based upon the following:

- Microbusinesses - A business which is owned and operated by a single person.
- Small sized businesses - A business which is operated by 2-4 people.
- Medium sized businesses - A business which is operated by 5-9 people.
- Large sized business - A business which is operated by more than 10 people.

In Makeni's Central Market to be upgraded, no medium or large-sized businesses were identified during the RP census.

Businesses have also been classified according to the type of product which includes both material items as well as services that they are selling. Where a trader is involved in more than a single product category, the survey team undertaking the survey defined the product category based upon the main source of income from the trader's business. The product categories used were:

- Food - Fresh meat and/ or chicken;
- Food – fresh fish;

- Food – prepared food (smoked fish and meat);
- Food – vegetables and fruit;
- Food – dry food (tins, pulses, etc.);
- Household goods;
- Clothes;
- Shoes
- Cosmetics;
- Tool machinists;
- Vegetable oil (local palm oils);
- Vegetable oil (Imported vegetable oil);
- Food- unprepared raw food (rice, Maize and cereals);
- Food-prepared food (rice, Maize and cereals);
- Vegetable leaves;
- Gari;
- Foo-foo;
- Tea items;
- Kolanuts;
- Groundnut, pepper and raw cooking items;
- Salon hair dressing (Timber shelves and timber wall and roof);
- Saloon barber shop;
- Electrical items; and
- Top-up mobile data selling.

The total number of people that are expected to be directly impacted by the Project, from the relocation of the businesses to a relocation site so that they can continue their activities, and then relocated back once more to the upgraded market, is provided in Table 2-1. Figure 2-3 presents the top 10 business categories used at the market. The survey results showed that several traders sell multiple types of products.

Table 2-1 The number of people who are expected to be directly impacted

Description	Number
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RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

POTENTIAL IMPACTS

Description	Number
Total number of traders:	1,654
Female traders:	1,408 (85.1%)
Male traders:	246 (14.9%)
Total number of workers:	44
Male workers	44 (100%)
Female workers	0 (0%)
Total number of helpers ² :	1,218
Male helpers:	472 (38.8%)
Female helpers:	746 (61.2%)
Total number of persons in households of traders and workers ³ :	9,286
Total number of persons in households of workers:	99
Total number of Project Affected Persons (PAPs defined as traders and workers):	1,698
Total number of businesses impacted by category:	1,654
Microbusinesses:	1,619 (97.9%)
Small-sized businesses:	35 (2.1%)
Medium-sized businesses:	0 (0%)
Large-sized businesses:	0 (0%)
Total number of impacted businesses by product category:	
Ground nut, pepper and raw cooking items	502
Food - Unprepared Raw food (Rice, Maize and Cereals)	229
Food – Prepared Food (smoked fish and meat)	208
Clothes	117
Food – Fresh Fish	104
Cosmetics	100
Food – Vegetables and Fruit	95
Food – Fresh meat and/ or chicken	92
Vegetable oil (Imported Oil)	89
Vegetable Leaves	75

² Helpers to the business are not entitled to any compensation on the basis that they are employed as domestic helpers for the household, and do not receive a daily wage which is linked specifically to the business.

³ This number is calculated as the people in the household of traders and workers who may be impacted by a potential loss of income as the business relocates to/from the relocation site.

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

POTENTIAL IMPACTS

Description	Number
Food – Dry Food (tins, pulses, etc.)	69
Tool Machinists	66
Household Goods	66
Shoes	61
Vegetable Oil (Local Palm oil)	50
Food- Prepared food (Rice, Maize and Cereals)	31
Saloon - Hair dressing (Timber shelves and timber wall and roof)	24
Tea Items	22
Electrical items	17
Foo-Foo	10
Miscellaneous items (top-up mobile data selling, sticks, boards, etc.)	27
Total number of immovable assets impacted by type (Total PAPs= 45 (F-23; M- 22):	
Fixed shelves	34 (F:21; M:13)
Fixed tables	37 (F:22; M:16)
Wooden doors	2 (F:1)
Steel doors	32 (F:19; M:13)
Wooden window	1 (F:1)
Cement walls	1 (F:1)
Concrete slab	1 (F:1)
Toilet	1 (M:1)

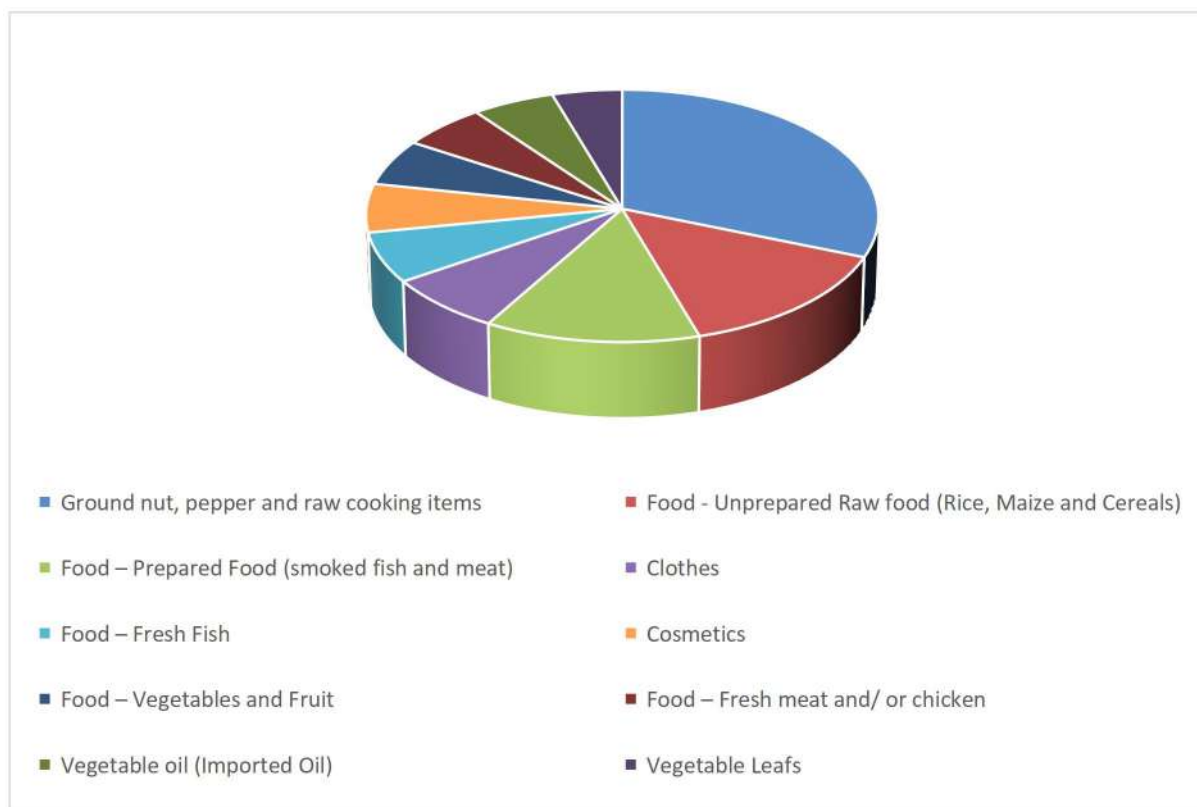


Figure 2-3 The category of the top 10 businesses impacted by product category

The outcome of the census, asset and inventory survey (RP survey) indicated that there are various types of fixed assets under private ownership (not owned by MCC, owned by the traders instead) that will be impacted by the demolition works. These assets are used by the traders and are fixed since they cannot be moved as the traders shift to their relocation site.

No private land will be affected, all the affected properties are makeshift structures situated within the existing markets boundaries

The types of fixed assets under private ownership are (example photos are also provided for some):

- A single structure used as a residential dwelling-land owned by the MCC (Figure 2-4);
- Fixed shelves and tables (Figure 2-5);
- Toilet (Figure 2-6);
- Wooden doors (Figure 2-7); and
- Cement walls with steel doors (Figure 2-8)
- 3 plots of land privately owned (MST 008, MST 0040 and MST 0041) located outside the market area but inside the area of influence. These are makeshift structures that are situated out of the market boundaries but will be affected by the works (they are too close to the hoarding and hence cannot be accessed by its occupants). The traders using these facilities will be relocated and given and provided with transitional

support. The owners will be compensated for the loss asset and loss of income (rent) throughout the construction period. The owners will use these funds to rebuild their structures after the market construction period. The land will remain the property of the current owners.

•



Figure 2-4 Photo of the Mixed use residential/commercial structure



Figure 2-5 Photo of fixed shelves and table



Figure 2-6 Photo of Toilet



Figure 2-7 Photo of fixed wooden doors privately owned



Figure 2-8 Photo of cement wall with steel door privately owned

The proposed project will result in resettlement impacts, primarily affecting those who earn their livelihood or reside within the Aol. These impacts will be short-term during the relocation process from the existing market to their relocation site, and during the process of relocating once again back to the upgraded market and will comprise loss of business income as businesses will not be able to function during this time period.

Given that the entire market will be relocated, traders are expected to experience minimal economic losses during the transitions to and from temporary sites. The relocation period is estimated to be 2 weeks for microbusinesses (to move to the relocation site/ back to the upgraded market) and 3 weeks for small businesses (to move in the same way described above)⁴. During this time, traders will face temporary income loss, which will be compensated under the transitional support. Relocation costs such as transportation of assets and products will also be covered under the practical support. Workers will also entail loss of income during the relocation period and will be compensated for it under the transitional support. Helpers to the business are not entitled to any compensation on the basis that they are employed as domestic Helpers for the household, and do not receive a daily wage which is linked specifically to the business.

Regarding the 366 traders who sell goods — such as cosmetics, salon products, electronics, etc. — that are difficult to accommodate at the relocation site due to their nature and the site's arrangement, these traders will find spaces at other markets across the city throughout the construction period. These traders will be provided with additional support (or an "additional compensation package") in addition to the transitional support, to enable them to self-relocate to other markets in the city.

As mentioned above, there is one mixed-use commercial and residential structure within the project area. The trader and their family occupying this structure will temporarily lose their residence during the construction phase. To mitigate this, rental fees will be provided for a period of two years for accommodation near the relocation site.

Three structures are fully owned by traders MST 008, MST 0040 and MST 0041 together with the lands which are located outside the market area but within the area of influence; these three owners will be compensated for their losses for all immovable assets as required by ESS5, except the land (since the Project will avoid land expropriation and compensation, and these plots fall outside the market building), as outlined in the RP budget and since their properties will be acquired by MCC for the market upgrade.

Additionally, traders who own fixed assets, as described above, will lose these assets as a result of the relocation. Compensation for these losses will be provided as outlined in the Resettlement Plan (RP) budget (section 13).

On the other hand, no physical impact, such as accidents and nuisance caused by construction works, is expected to occur to the customers since they are not likely to visit the market whilst the upgrade works are ongoing.

Section 7 and 8 provide details on who is eligible for compensation and the valuation and compensation for losses methodology.

⁴ In Makeni central market upgrade site, no medium or large-sized businesses were identified during the RP census.

3. OBJECTIVES AND PROCESSES

3.1 EFFORTS MADE TO AVOID OR MINIMISE RESETTLEMENT

The following efforts have been made to avoid or minimise resettlement:

- The physical area which is to be used during the upgrade works by the construction contractor will be minimised to the extent possible, whilst reflecting on the levels of noise and air emissions that are to be generated by the works, and the need to position construction fencing around the perimeter of the works to maintain community health and safety.
- The need to minimise the period of time required for the upgrade works, when traders will be forced to use the relocation site, where it is possible that the presence of customers will be different (reduced) compared to current levels.

3.2 RP OBJECTIVES AND PRINCIPLES

The objectives of the RP as per ESS5 are:

- To identify and assess unavoidable adverse social and economic impacts.
- To mitigate unavoidable adverse social and economic impacts from restrictions on land use and physical and economic displacement by: (a) providing timely compensation for loss of assets at replacement cost and (b) assisting PAPs in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher;
- To improve living conditions of vulnerable persons who are physically displaced, through provision of adequate selling space at the relocation site/ housing, access to services and facilities, and security of tenure;
- To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable PAPs to benefit directly from the project, as the nature of the project may warrant;
- To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected; and

The resettlement principles that apply to the RP are the following:

- No forced eviction shall take place under any circumstances;
- All land-related activities shall be undertaken in accordance with national legislation and ESS5. Where there are differences in standards between national legislation and ESS5 in terms of compensation, the 'higher' standard will be adopted;

- A cut-off date will be established and displaced persons will be made aware that any land-related improvements made after the cut-off date shall not be eligible for compensation. The market traders and community will also be made aware through the City Council and traders' Unions that anyone entering the market as a trader or worker after the cut-off date will not be eligible for compensation;
- Vulnerable people have been identified using a set of predefined criteria (section 4.4);
- All PAPs have been engaged with during preparation of the RP through the surveys conducted and consultation meetings (Section 9) and this consultation will continue during implementation of the RP;
- A Grievance Redress Mechanism (GRM) was established to receive and address, in a timely fashion, resettlement-related grievances raised by PAPs and other stakeholders (Section 14). The GRM will be available, also, for use during implementation of the RP until all resettlement-related activities are completed;
- Traders will only be required to vacate their selling space after a Compensation Agreement has been signed and a transitional support has been paid. A similar agreement will be used for the workers;
- The 366 affected traders who cannot be accommodated at the relocation site will be provided with additional support to self-relocate to spaces in other markets across the city;
- Traders will be entitled to state their preference for a relocation site and best efforts will be made to accommodate their choices.
- The private owners of fixed assets (such as fixed tables for example), will be entitled to salvage the materials, even if they are provided with compensation;
- All livelihood restoration and standard of living improvement measures will be provided equally to men and women, with a range of measures specifically targeting the restoration of women's livelihoods;
- Specific assistance measures will be provided to vulnerable PAPs during the resettlement implementation process, with the aim of ensuring that they are not disproportionately impacted by resettlement;
- The implementation of the RP will be led by an independent RP implementation consultant recruited for the purpose, and shall be carefully monitored through internal monitoring and monthly reports, and a quarterly review during implementation. At all monitoring/evaluation stages, corrective actions will be recorded, addressed, and tracked until the corrective action is resolved, with the aim of improving the way in which the RP is implemented over time;
- In cases where there is more than one owner of a fixed asset that is to be impacted (i.e., a couple in a legal union or other form of union that is legally recognised), cash

compensation will be divided equally and paid to the bank accounts they specify, or into a single joint account they both have access to, or in a different way that is agreed by all parties;

- No individual names of traders will be included in the RP to maintain the confidentiality of the people involved. The personal data will be removed from the survey teams devices after the RP has been accepted, leaving the only copy on ELARD's main IT servers which are very secure .

3.3 RP PREPARATION PROCESS

The purpose of this section is to describe the process used to compile data for the RP.

A census and socio-economic survey of traders was undertaken during September 2023 to gather basic information on the traders, although it was necessary to conduct an additional survey in May/June 2024 as there were several critical items of information missing which were later addressed through the RP surveys.

The detailed RP work plan is presented in Appendix C and the detailed questionnaires used in the RP surveys conducted during the period of May/June 2024 are presented in Appendix D.

During the September 2023 survey, details of the cut-off date were verbally discussed with each Trader, although there is no documentation or photos available to reflect this. Consequently, during the RP survey undertaken between May 3 and June 12, 2024, details of the cut-off date were verbally disclosed to the traders, stakeholders were informed of the cut-off date during consultation meetings (refer to Section 9, and signs were posted by the RUSLP PMU throughout the market to publicly disclose the cut-off date (June 10th, 2024). A photo of the sign (in poster form) posted inside the market is presented in Figure 3-1.



Figure 3-1 Photo of the cut-off sign installed at the market

A detailed QA/QC check was undertaken on the database, to identify errors and entries which required checking with the survey team for accuracy. This process was led by the ELARD Project Manager and involved repeated discussions with the manager of the survey team and checks of the original data records on Kobo Collect Tool.

The RP survey was followed by a total of 5 focus group discussions that were undertaken on July 1st and 2nd, 2024 with a total of 101 traders attending (across all of the 5 meetings), to provide an opportunity for direct engagement with the traders who are required to relocate and to gather feedback on the proposed process for relocation, the suitability of the relocation site, and the time to be provided to traders to relocate their businesses.

3.4 COMPLETION OF A VULNERABILITY ANALYSIS

A vulnerability analysis was undertaken using the central database which identified vulnerability characteristics at a household level, amongst the traders and workers. The two socio-economic surveys were specifically designed in a way that allowed the identification of vulnerable people which may include any of the following people or groups that meet the following criteria:

- Head of the household is illiterate;
- Orphans (males and females under the age of 24) or children (under the age of 18) who have lost both parents;
- Households where a disabled child is present, or a disabled parent is present, or where a household member is chronically ill or in need of care;
- Households with more than five children;
- Youth-headed household;
- Single-parent household;
- Households consisting only of elderly people (people aged 65 years or older)
- People who are discriminated against in society due to their albinism, HIV, history of contracting Ebola, or other reason; and
- Adult with poor health (Practical support to address their physical disability where this is practical to do so, such as the provision of tri-walkers, rollators, and other equipment.);
- Persons with mental and/physical disabilities.

This vulnerability criteria, with justifications, are provided in Table 3-1 for each category of vulnerable persons listed above.

Table 3-1 Vulnerability criteria and justifications

Vulnerability source	Justification
Head of the household is illiterate	If the head of the household is illiterate then they will require support to understand all written materials provided to them concerning the RP implementation process, including the content of the Written Agreement.
Households of youths (under the age of 24) or children (under the age of 18) who have lost both parents (they are orphans)	Such persons are likely to be particularly susceptible to any changes in their socio-economic status in the absence of parents who would otherwise be economically active. They may also be looked after by elderly relatives.
Households where a disabled child is present, or a disabled parent is present, or where a household member is (or has	Households with a disabled/ill adult or child are likely to be particularly susceptible to any changes in their socio-economic status, due to the need to provide

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

OBJECTIVES AND PROCESSES

Vulnerability source	Justification
recently been) ill or is in need of care	care for the affected person, leading to their inability to work full-time, or be economically active at all.
Households with more than five children	Households who have a high number of children will have a high dependency ratio, whereby any change to the head of household's income could have a significant, adverse impact on the socio-economic status of the household.
Youth-headed households	A youth heading a household is likely to be particularly susceptible to any changes in their socio-economic status, due to the need to provide care for their household without parents or an experienced adult to support them economically and emotionally.
Single-parent household	Single parent households are likely to be particularly susceptible to any changes in their socio-economic status, due to the need to provide care for children without a partner who is economically active.
Households consisting only of elderly people (people aged 65 years or older)	People who are elderly may have a range of specific needs due to their age and may be less able to adapt to change, compared to their younger counterparts.
People who are discriminated against in society due to their albinism, HIV, history of contracting Ebola, or other reason	<p>People who experience discrimination are typically unable to be influential within the community, assist in decision making processes, and 'be heard'.</p> <p>People who experience discrimination can find it difficult to access employment opportunities which reduces their potential to generate income and be economically active.</p>
Adult with poor health	A person who experiences a diminished ability to perform daily activities, generate income, and/or maintain their general well-being. Such a person may need additional support to relocate and understand the process of relocation. (Practical support to address their physical disability where this is practical to do so, such as the provision of tri-walkers, rollators, and other equipment.)
Adult with mental disability	A person who has a mental/physical disability may not be able to attend consultation meetings, and may need additional support to relocate and understand the process of relocation.
Adult with physical disability	

4. CENSUS SURVEY AND BASELINE SOCIOECONOMIC STUDIES

The purpose of this section is to provide details from the RP surveys conducted in May/June 2024 regarding the traders and workers who will be impacted by the project. The outcome of the survey complemented the previously collected data from the traders, their business, and the number and general profile of the traders and workers.

A total of 8 people were involved in the survey (5 men and 3 women). The survey questionnaire was loaded onto their tablets using Kobo Collect tool whilst the survey was completed. Before the start of the survey, the team attended a 2-day training session at Makeni, led by the international resettlement specialist from ELARD, to witness example surveys in action, practice using the forms prepared, and discuss how to engage with traders and workers as the survey progresses.

During the RP surveys, each trader was asked if they already registered with the MCC and, where Traders were found not to have been registered, this process was completed so that all Traders captured by the census were registered.

The location (zone) of Trader was recorded so that the same groups of people, some of whom rely on each other for childcare arrangements and to manage their stalls if they need to leave for a short period of time during the day, can be kept in close proximity together both at the relocation site and also at the upgraded market.

4.1 SOCIO-ECONOMIC STATUS OF TRADERS

This section provides an analysis of the socioeconomic characteristics of traders. It focuses on key demographics such as age, gender, marital status, educational level, and vulnerability status, all of which are critical in assessing the traders' adaptability and needs during the resettlement process. Understanding these factors helps identify potential risks and challenges, ensuring that the plan addresses the specific needs of different trader groups, promotes equitable support, and fosters sustainable livelihood restoration for those affected by the resettlement.

A breakdown of the ages of the traders is provided in Figure 4-1 that shows that traders' age ranging between 26 to 35 is the most common.

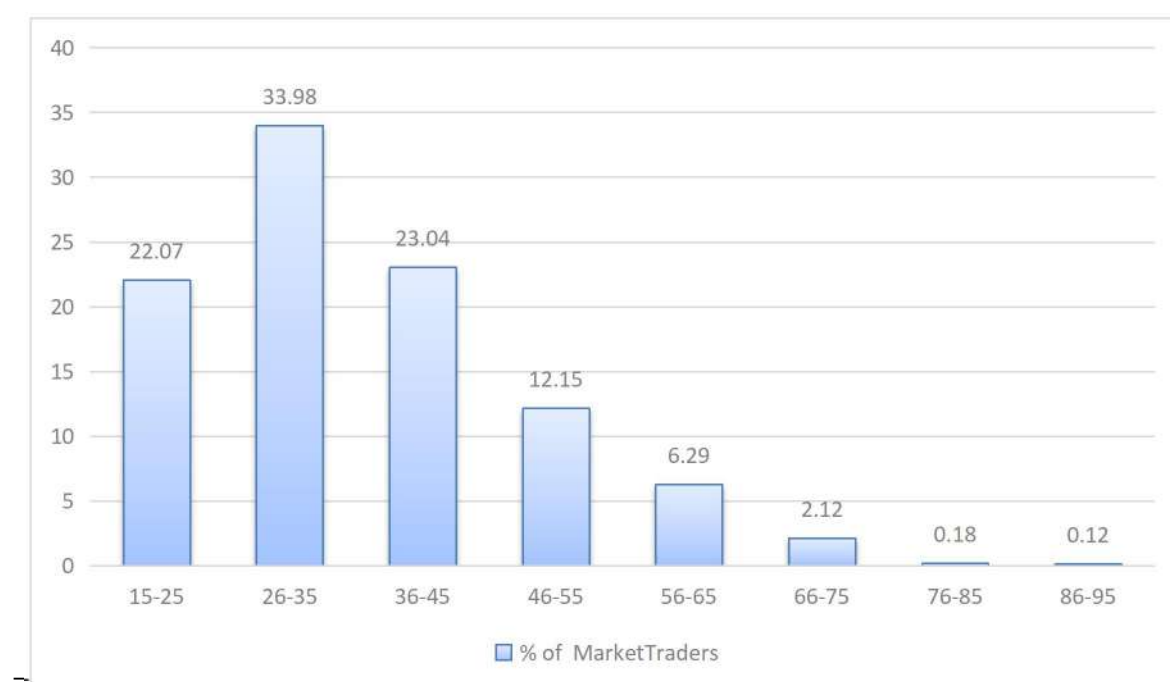


Figure 4-1 Age breakdown of the traders

The Trader's gender, marital status, educational status is provided in Table 4-1, Table 4-2 and Table 4-3.

Table 4-1 Trader's' gender

Topic	Number	Percentage
Traders (female)	1,408	85.1
Traders (male)	246	14.9
Total	1,654	100%

Table 4-2 Traders' Marital Status

Marital Status	Number	Percentage
Single/never married	346	20.9
Married	984	59.5
Divorced	71	4.3
Widow	241	14.6
Widower	4	0.2
Cohabiting	8	0.5
Total	1,654	100

Table 4-3 Traders' Educational Status

Educational Status	Number	Percentage	National Percentage
None	736	44.5	44.2
Primary school	128	7.7	29.3
Junior Secondary school	160	9.7	10.3
Senior Secondary school	486	29.4	7.9
College	62	3.7	NA
University	62	3.7	NA
Arabic Education	14	0.8	NA
Vocational	6	0.4	NA
Total	1,654	100	NA

A summary of the Trader's distance of residence to the market, their registration with the MCC, use of childcare arrangements and languages spoken is provided in Table 4-4 while the household size distribution is presented in Table 4-5.

Table 4-4 Trader's' distance to the market, registration, use of childcare arrangements and languages spoken

Topic	Description
Traders' proximity from their residence to the existing market	Minimum distance: 1m Maximum distance: 55 km Average distance: 1.84 km
Traders' registration with MCC	Total number registered at the time of the May/June 2024 survey: 344 Percentage of total who were registered at the time of the survey: 20.8% Percentage of traders registered as of 10 July 2024: 100%
Traders' use of childcare arrangements whilst at the market	Total number using childcare arrangements: 781 Percentage: 47.2%
Traders' languages spoken:	Temne = 92.2% Krio = 91.4% English = 7.3% Limba = 5.5% Fullah = 3% Mandingo = 2.4% Other = 5.3%

Table 4-5 Traders' household size distribution

Household composition	Number of traders	Percentage
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Household composition	Number of traders	Percentage
1 person per household	3	0.2
2 person per household	142	8.6
3 person per household	143	8.6
4 person per household	244	14.8
5 person per household	362	21.9
6 person per household	263	15.9
7 person per household	217	13.1
8 person per household	128	7.7
9 person per household	57	3.4
10 person per household	49	3.0
11 person per household	23	1.4
12 person per household	10	0.6
13 person per household	5	0.3
14 person per household	1	0.1
15 person per household	4	0.2
16 person per household	1	0.1
17 person per household	1	0.1
20 person per household	1	0.1
Total	1,654	100%

The daily income of the business was recorded during the survey and the corresponding information is provided in Figure 4-2. The most frequent daily income ranges from NLE 21-50 and NLE 51-100 based on the results shown in the graph below.

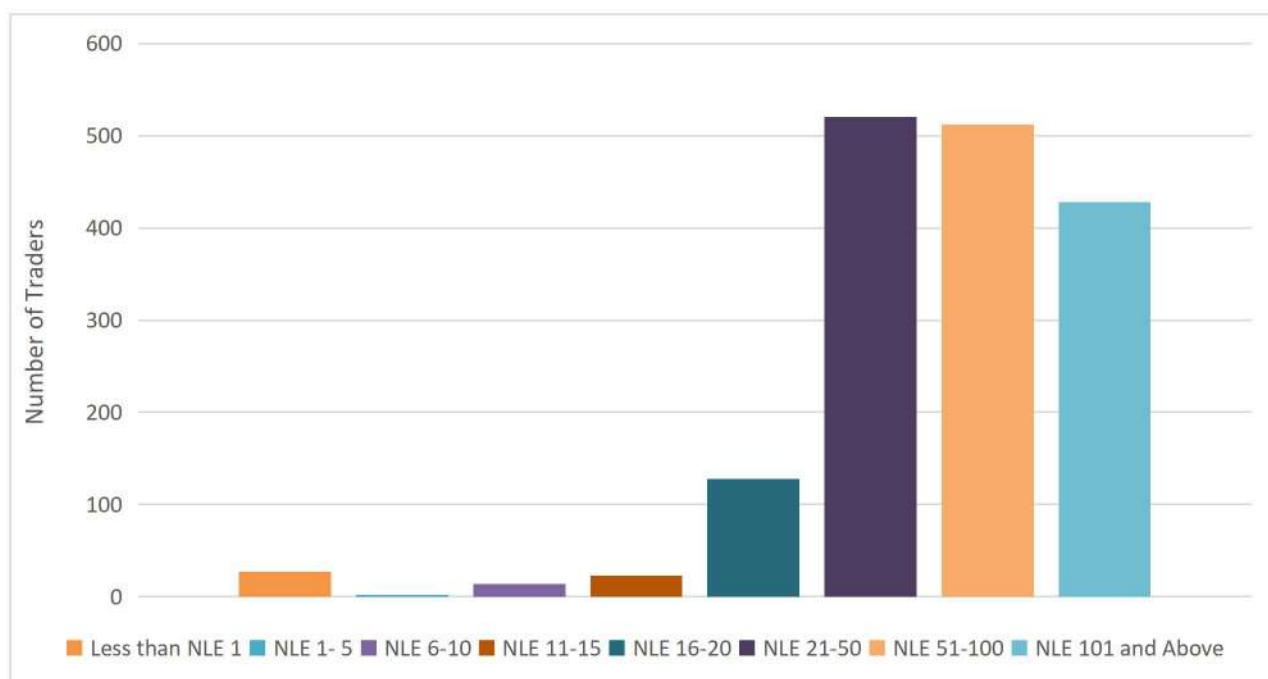


Figure 4-2 Daily income range of traders

The traders household monthly income (by income range) and debt details are provided in Figure 4-3 and Figure 4-4. Most traders (almost 900 of those interviewed) have a monthly income of NLE 1,000 to 5,000. Almost 71% of the traders stated that their household is in debt.

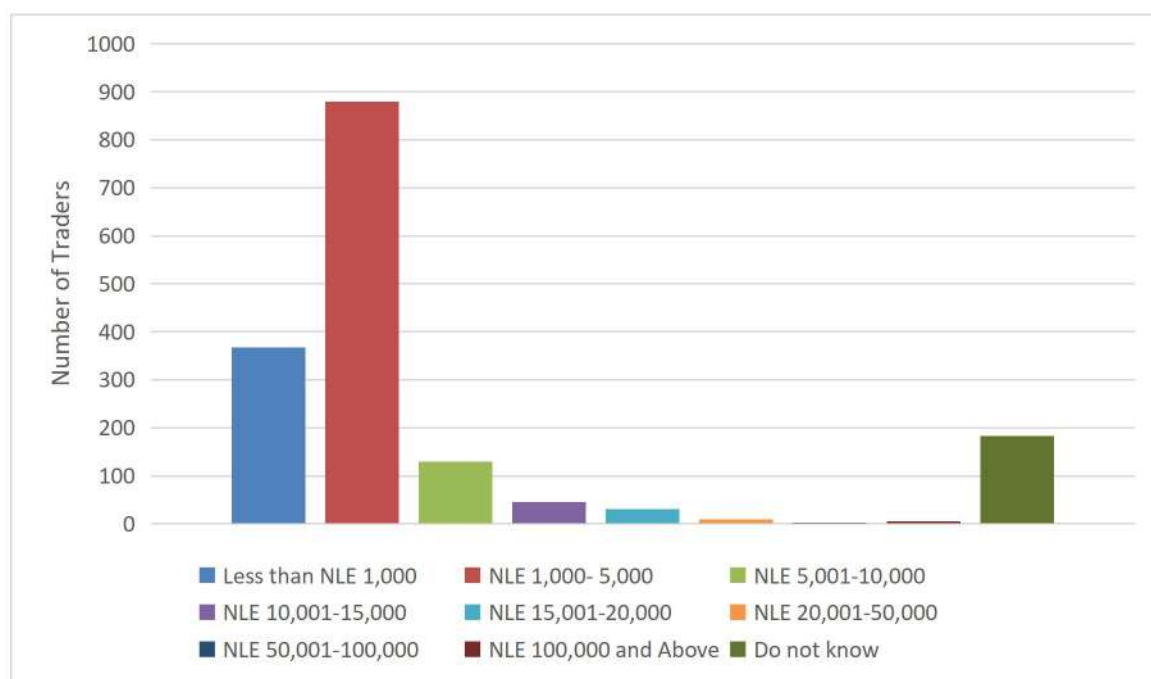


Figure 4-3 Household Monthly Income range of traders

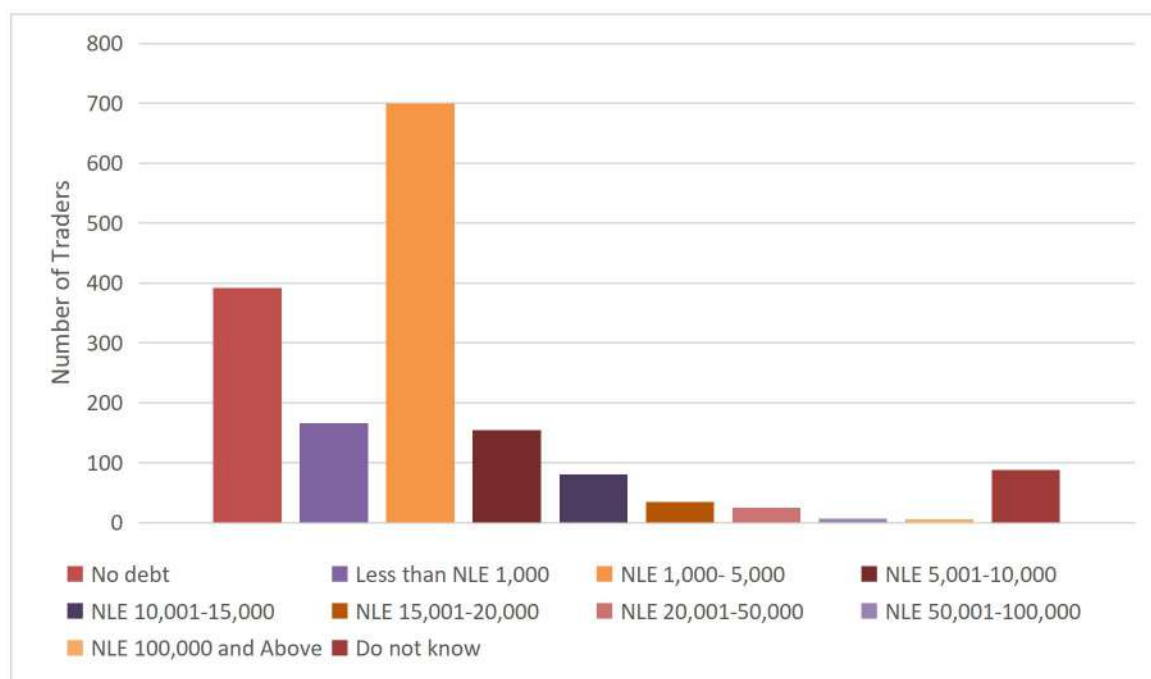


Figure 4-4 Traders' Household debt level

Details of the traders' vulnerability and the outcome of the vulnerability analysis using the pre-defined criteria in Section 3.4 are presented in Table 4-6.

Table 4-6 Outcome of a vulnerability analysis using the pre-defined criteria

Source of vulnerability	Number of the traders with this vulnerability	Percentage
None	831	50.2
Head of the household is illiterate	340	20.6
Households of youths (under the age of 24) or children (under the age of 18) who have lost both parents (they are orphans)	104	6.3
Households where a disabled child is present, or a disabled parent is present, or where a household member is (or has recently been) ill or is in need of care	82	4.9
Households with more than five children	253	15.3
Youth headed household	49	3
Mothers or fathers who are bringing up the children in a single-parent household	275	16.6
Households consisting only of elderly people (people aged 65 years or older)	149	9
People who are discriminated against in society due to their albinism, HIV, history of contracting Ebola, or other reason	1	0.1
Adult with poor health	55	3.3
Adult with mental disability	16	1
Adult with physical disability	118	5.4
Other (not specified)	352	21.3

4.2 SOCIO-ECONOMIC STATUS OF TRADERS' BUSINESSES

The purpose of this section is to present the information concerning the traders' Businesses within and outside the market.

A summary of the location of the businesses by the eight zones, is provided in Table 4-7.

Table 4-7 Location of the businesses in the market and outside

Business Zone	Number of traders	Percentage
Zone 1- Main market	256	15.5
Zone 2 - Dry Fish inside main market	176	10.6
Zone 3 - Sylvanus market	259	15.7
Zone 4 - Market Road	453	27.4
Zone 5 - Outside the main market	170	10.3
Zone 6 - Cotton tree Outside the area of influence	153	9.2
Zone 7 - Cotton tree area and Church Street in the area of influence	127	7.7
Zone 8 - Outside the main market	60	3.6
Total	1,654	100

The utility connections to which the businesses currently have access were not captured in the surveys, and instead information on the utility connections requested by the traders was collected. This information is presented in Table 4-8.

Table 4-8 Type of Utilities requested by the traders for the upgraded market

Utility Type	Number of traders who required for this utility	Percentage of traders who required for this utility
Electrical power	1,491	90.1
Public toilet	1,449	87.6
Close access to water	1,423	86
Close health facility	1,387	83.9
Mosque	1,076	65.1
Piped water	844	51
Daycare for children	558	33.7
Solid waste sanitation facilities	554	33.5

Utility Type	Number of traders who required for this utility	Percentage of traders who required for this utility
Wastewater sanitation facilities	515	31.1
Cold room storage	473	28.6
Access to locked storage areas that are owned by the Trader	470	28.4
Access to locked storage areas that are owned by the MCC	443	26.8
Church	462	27.9

The structures/objects used for selling, and the space used by the business were recorded using tape measures during the socio-economic survey, and the data are presented in Table 4-9 and Figure 4-5. More than half (69%) of the traders use less than 2 m² selling space.

Table 4-9 Type of structures/objects used by the market traders

Structure type	Number of traders	Percentage
Moveable wooden table/stool	931	56.3
Umbrellas	548	33.1
None (selling on the floor)	272	16.4
Fixed wall(s) and roof around the space occupied by the trader	255	15.4
Fixed double concrete table owned by the MCC	189	11.4
Fixed roof	157	9.5
Fixed wooden table	141	8.5
Fixed single concrete table owned by MCC	86	5.2
Car tyre (used as a table)	56	3.4
Fixed triple concrete table owned by MCC	37	2.2

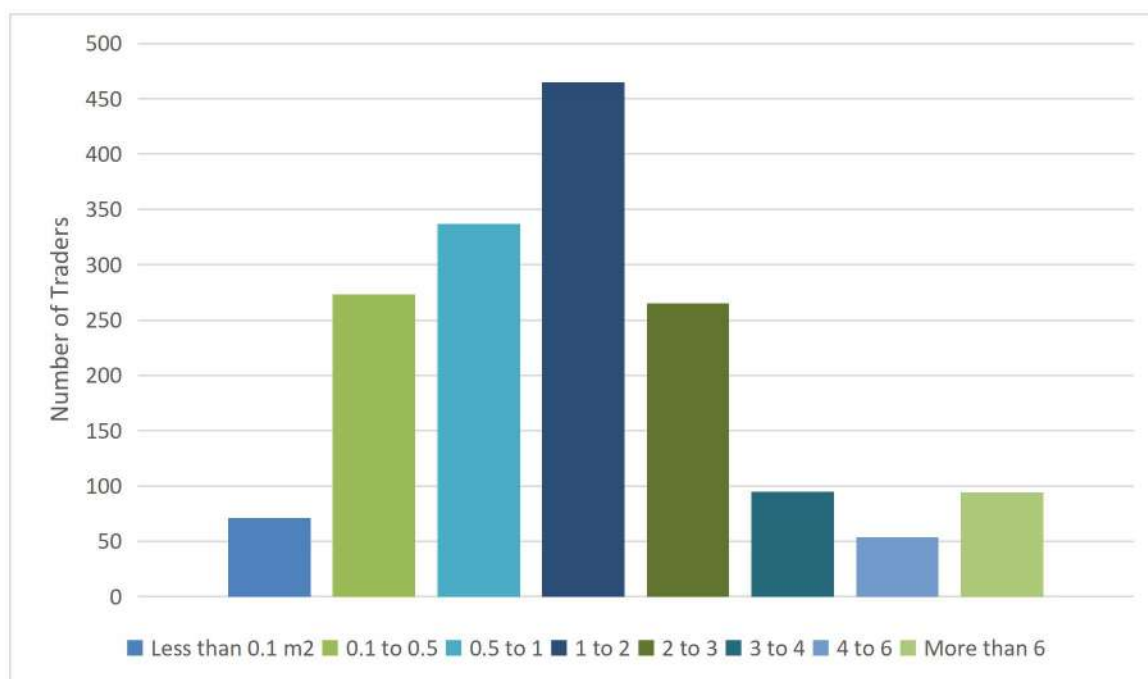


Figure 4-5 Space used by the business (m²)

A series of photos that reflect the types of businesses is provided in Figure 4-6.



Tool Machinist



Clothes



Food- Raw fish



Food- Cooked fish



Foo-foo



Groundnut+ pepper and raw cooking items

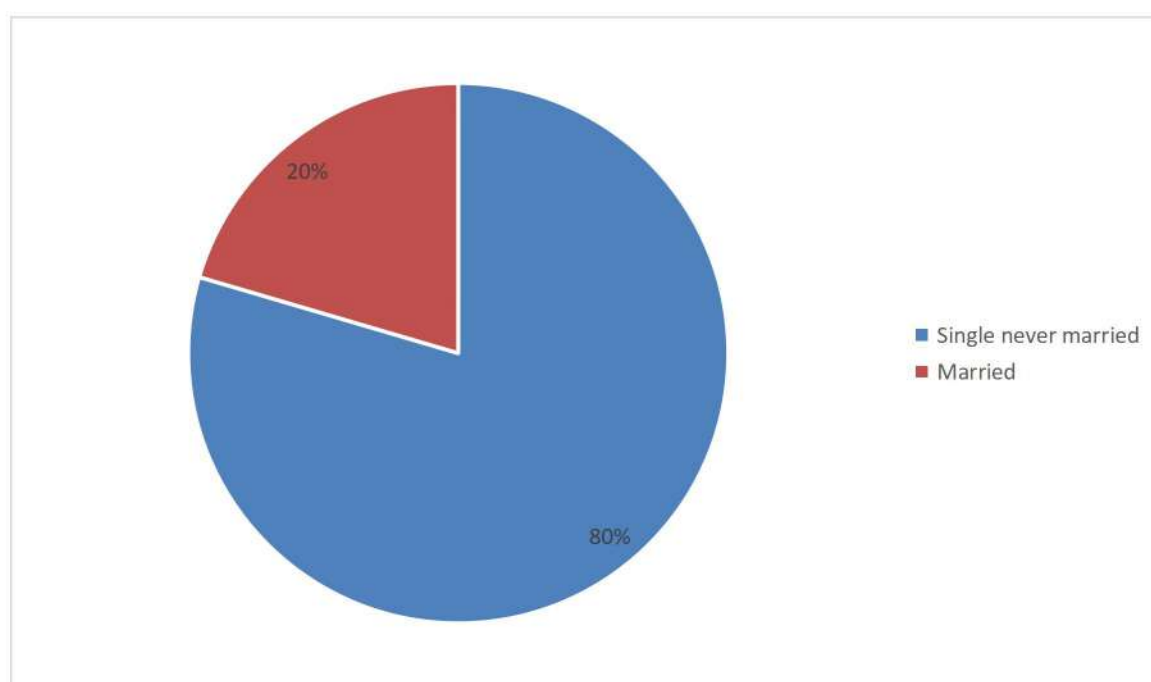
Figure 4-6 Photos taken of the different types of businesses at Makeni Market**4.3 SOCIO-ECONOMIC STATUS OF WORKERS**

All 44 workers are males. The majority of the workers' age range is between 15 to 25 as shown in Table 4-10 .

Table 4-10 Age Range of the Market Workers

Age range	Number of Workers	Percentage of Workers
15 to 25	35	79.5
26 to 35	5	11.4
36 to 45	3	6.8
46 to 55	1	2.3
Total	44	100

Around 80% of the market workers are single/never married, while the rest are married as shown in Figure 4-7.

**Figure 4-7 Marital Status of the market workers**

The majority of the workers (84%) are junior and senior secondary school attendees, as shown in Figure 4-8.

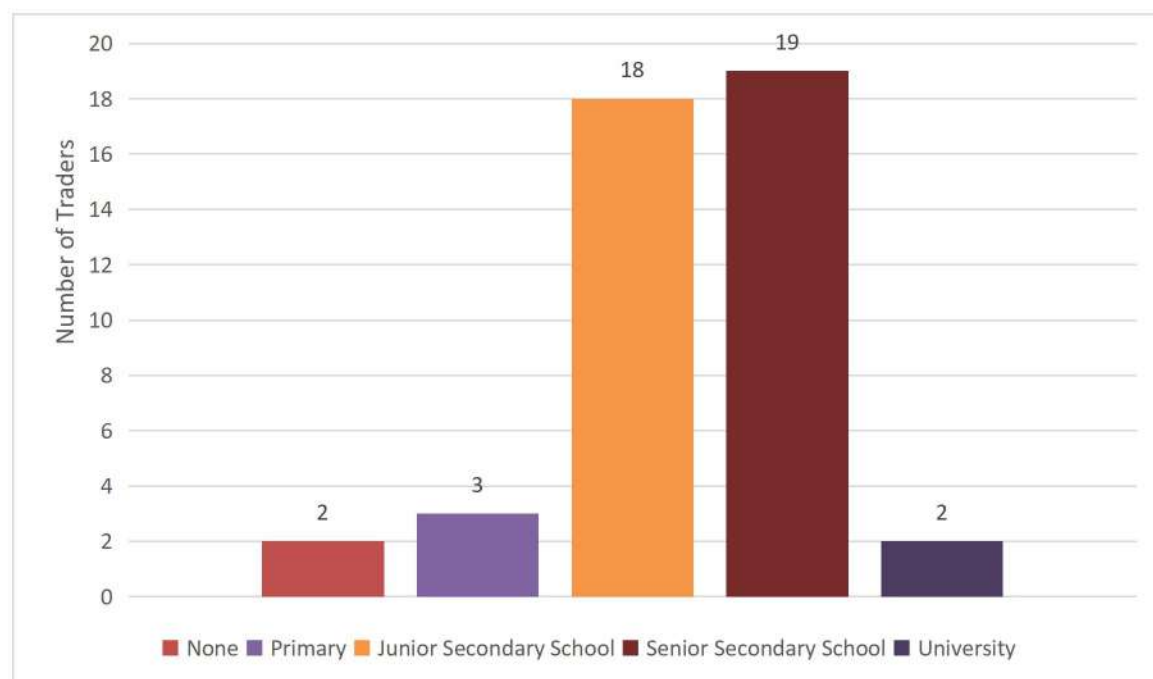


Figure 4-8 Educational Status of the market Workers

Almost half of the market workers are permanent, while the other half is temporary (Table 4-11).

Table 4-11 Employment Status of the market Workers

Employment Worker	Status of	Number of traders	Percentage
Permanent		21	52
Temporary		23	48

The most spoken languages by the Market workers are Temne and Krio as shown in Figure 4-9.

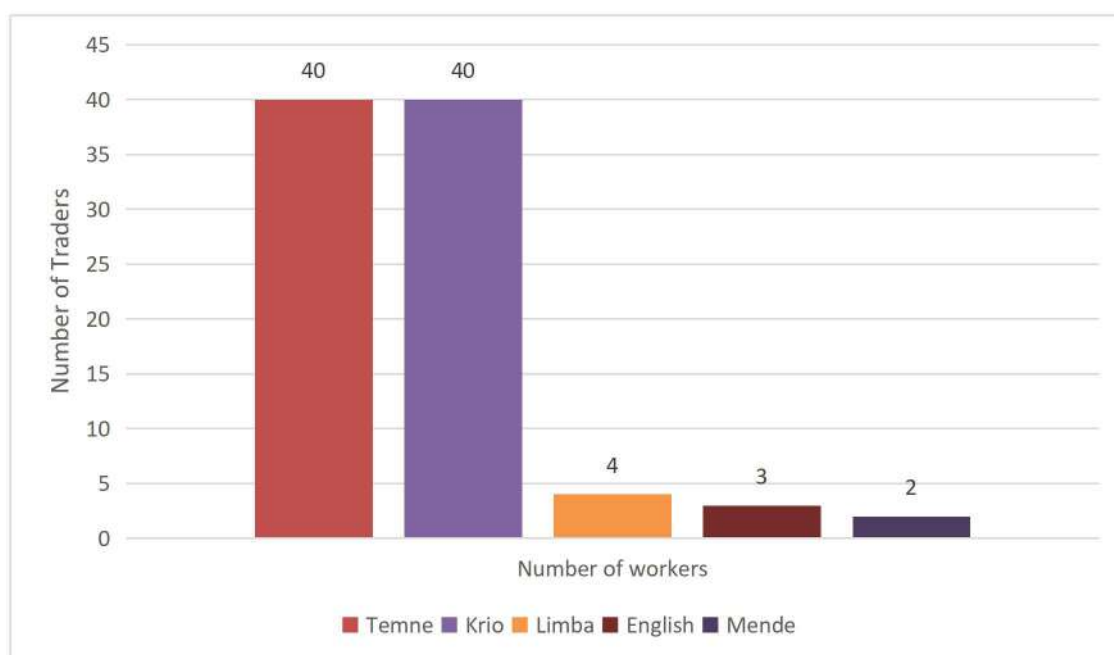


Figure 4-9 Languages spoken by the market Workers

The most frequent range of market workers' daily salary is NLE 46 to 50 NLE (Figure 4-10).

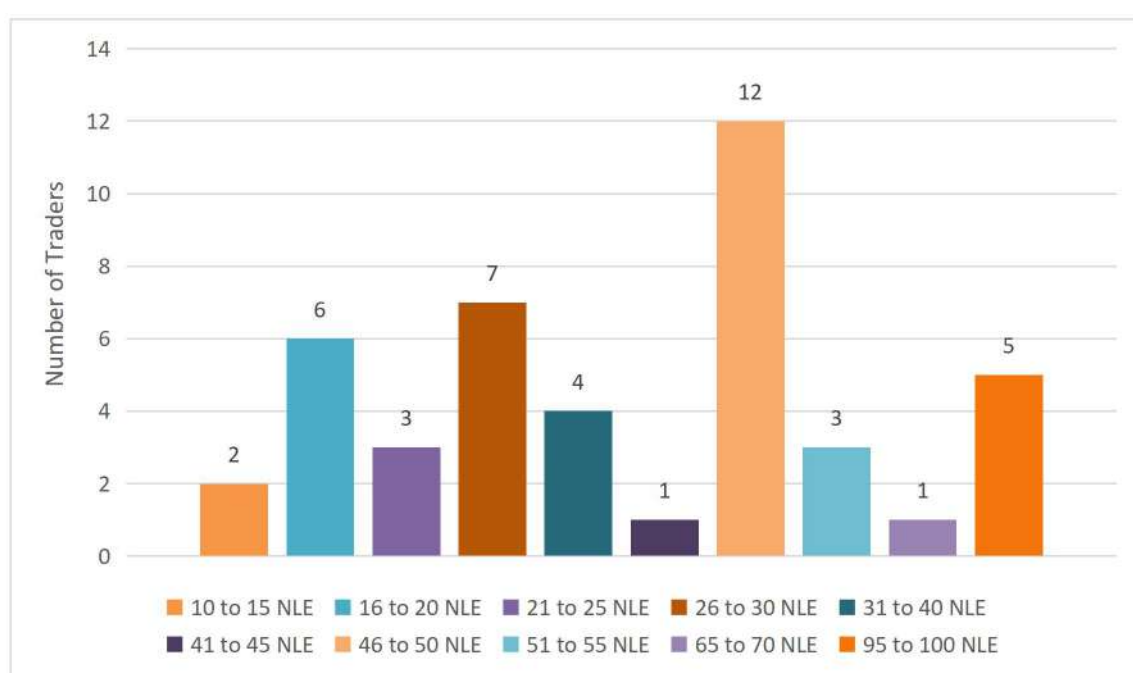


Figure 4-10 Market Workers' daily salary range

Based on the analysis of the available workers' data, around 64% of the workers' households consist of one person only (Table 4-12).

Table 4-12 Household size distribution of the market Workers

Number of People in the Household	Number of Workers	Percentage

Number of People in the Household	Number of Workers	Percentage
1	28	63.6
2	2	4.5
3	2	4.5
4	5	11.4
5	3	6.8
6	2	4.5
7	2	4.5

4.4 SUMMARY OF VULNERABLE PEOPLE

Based upon the outcome of the RP surveys, a summary of the PAPs' responses to the questions concerning their vulnerability is provided in Table 4-13. It should be noted that some traders and workers have more than a single source of vulnerability, which is why the total number of responses is higher than the total number of individual traders and workers. Based upon a detailed analysis of the PAP database, a total of 760 traders and 12 workers possess at least a single source of vulnerability (772 in total).

Table 4-13 Summary of vulnerable people

Source of vulnerability	Vulnerability amongst traders	Vulnerability amongst Workers	Total number of responses
None	831	32	863
Head of the household is illiterate ⁵	340	NA	340
Households of youths (under the age of 24) or children (under the age of 18) who have lost both parents (they are orphans)	94	NA	94
Households where a disabled child is present, or a disabled parent is present, or where a household member is (or has recently been) ill or is in need of care	82	NA	82
Households with more than five children	253	0	253
Child-headed household under the age of 24	49	NA	49
Mothers or fathers who are bringing up the children in a single-parent household	275	7	282
Elderly people (people aged 65 years or older)	149	NA	149
People who are discriminated against in society due to their albinism, HIV, history of contracting Ebola, or other reason	1	0	1

⁵ This number represents the head of household who happen to be illiterate and does not represent all that traders who are illiterate.

Source of vulnerability	Vulnerability amongst traders	Vulnerability amongst Workers	Total number of responses
Adult with poor health	55	1	56
Adult with mental disability	16	0	16
Adult with physical disability	118	1	119
Other (not specified)	352	3	355

The key findings of the socio-economic survey are summarised below:

- The majority of the traders are young people (26-35) and are female, married, and have only a primary school education;
- The average distance from the trader's residence to the market is 1.8 km, reflecting that they live within the Makeni city and immediate surrounding area;
- Just under half of the traders use childcare arrangements;
- Almost all of the traders speak Temne and Krio;
- The majority of the traders live in a household with 4-6 persons;
- The majority of the traders' monthly income ranges from NLE 1,000 to NLE 5,000 and the majority are in financial debt. The most frequent amount of debt they are in is NLE 1,000 to NLE 5,000 which is the same range as their monthly income;
- Sources of the most frequent type of vulnerability comprise a female or child-headed household/ single parent household;
- The majority of the traders use a moveable wooden table or stool for their business;
- All of the workers are male and aged between 15 to 25, with the majority single and completed senior school, reflecting that they have a slightly higher (on average) educational status than the traders; and
- The worker's daily salaries vary across the range specified in the survey, but are lower, on average than traders' salaries, and they have relatively fewer sources of vulnerability per 10 people, compared to the traders.

4.5 SOCIO-ECONOMIC STATUS OF CUSTOMERS

Key informant interviews were conducted with 877 Makeni Market customers and the results were as follows:

- The majority of customers visit the market either every day (61.8%) or every week (22%);
- Most of the customers (94%) visit the market to purchase cooking items;
- A total of 67% of the customers live 1-2 km from the market, which is a similar distance to the traders;
- The majority of the customers reach the market by motorbike (77%);

- Out of the total customers surveyed, 67% indicated that they were aware of the Project; and
- Importantly, 94% of the customers indicated that they would continue to buy from the traders, even if they relocated to another location whilst the upgrade works were ongoing.

The detailed results of the key informant interviews can be found in Appendix B.

4.6 SOCIO-ECONOMIC STATUS OF FIXED ASSETS OWNERS

A survey was conducted among 45 owners of private, fixed assets which will require demolition, and the results are presented in the tables below. The data on fixed assets is linked in the database to the identity of the Trader and the business, so that the owners of all fixed assets are known.

Table 4-14 Socio-economic status of fixed assets owners

Topic	Number of owners	Percentage
Gender	Female: 23	51.1%
	Male: 22	48.9%
Marital status	Married: 30	66.7%
	Widow: 9	20%
	Single/never married: 4	8.9%
	Cohabiting: 2	4.4%
Employment status	Permanent: 43	95.6%
	Temporary: 2	4.4%

Table 4-15 Socio-economic status of fixed assets owners

Topic	Number of fixed assets	Percentage
Building permit issued (where required) by MCC	No: 42	93.3%
	Yes: 3	6.7%
Location of the structure	Outside market but inside Aol: 43	95.6%
	Inside market: 2	4.4%
Current usage of structure	Commercial: 45	97.8%
	Mixed use-residential and commercial: 1	2.2%
Connected to the physical structure of the market (i.e. an adjoining wall)	Yes: 39	86.7%
	No: 6	13.3%
General physical condition of structures outside market but inside AOI	New or very good: 23	51.1%
	Fair: 20	44.4%

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

CENSUS SURVEY

Topic	Number of fixed assets	Percentage
	Poor: 2	4.4%
General physical condition of structures inside market	New or very good: 22	48.9%
	Fair: 21	46.7%
	Poor: 2	4.4%
Type of material the structure is made of	Cement blocks: 43	95.6%
	Panbody (small, temporary structure made from corrugated metal sheets, typically zinc): 1	2.2%
	Dirty block with cement mortar (Mud bricks structure held together with cement mortar which is a mixture of cement, sand, and water used as a binding material in masonry construction): 1	2.2%
Type of walls	Cement plaster with paint: 33	73.3%
	Cement plaster without paint: 11	24.4%
	Panbody wall without paint: 1	2.2%
Type of doors	All over steel doors: 37	82.2%
	No doors: 3	6.7%
	All over wooden doors: 2	4.4%
	Mixed steel and wooden doors: 2	4.4%
	All over panbody doors: 1	2.2%
Type of windows	No windows: 42	93.3%
	All over wooden windows 2	4.4%
	All over steel windows 1	2.2%
Floors inside the structures	Paved floor: 37	82.2%
	Unpaved floor: 4	8.9%
	Tiled floor: 4	8.9%
Number of floors	One floor: 42	93.3%
	1 storey building (G+1): 3	6.7%

NOTE: There is a single mixed use residential-commercial structure which is to be impacted from the upgrade works situated on a privately owned land parcel adjacent to the market. This structure is physically reliant on the physical integrity of the market structure owned by MCC and when the existing market is upgraded, the integrity of the private residence will be impacted. Additionally, it will not be possible for the occupants to continue living at their residence whilst the works are ongoing, due to the generation of noise, air emissions, and due to their close proximity to the works and the need to maintain their safety.

The status of ownership of fixed assets is presented in Table 4-16. 84.4% own the structure on MCC leased land, while 6.7% fully own the structure and land.

Table 4-16 Status of ownership of fixed assets

Status of ownership	Number of owners	Percentage
Owned the structure on MCC leased land	38	84.4
Fully owned the structure and the land	3	6.7
Owned the structure on a private leased land	2	4.4
Formal lease of private property	1	2.2
Shared ownership	1	2.2
Total	45	100

82.2% of the structures are connected to the public power grid, while only 22.2% are connected to the public water network.

Table 4-17 Type of utilities connected to the structures

Utility connected to the structure	Number of structures	Percentage
Connection to public power grid	37	82.2
Connection to public water network	10	22.2
Running water in house	1	2.2
No utility connected	1	2.2

The key findings of the survey of fixed assets impacted by the Project are summarized as follows:

- The fixed assets are owned equally by men and women;
- Most fixed assets comprise cement plastered walls, steel doors, windows, and paved floors.
- The majority (93%) were installed without the necessary building permit that must be issued by MCC; and
- The majority (96%) of fixed assets are located outside of the market but inside the AoI and will still be impacted by the Project. This is because they are (in 87% of cases) physically connected to the structure of the market building (such as a wall) which will require demolition and therefore affect the physical integrity of the privately owned asset.

5. REGULATORY AND POLICY FRAMEWORK

5.1 INTRODUCTION

This section summarizes the legal requirements and institutional processes that underpin land acquisition and resettlement of PAPs in Sierra Leone and the requirements of the World Bank, with respect to outlining requirements for infrastructural projects in the country's National Policy Framework.

The relevant laws and policies applicable in the country and relevant to this RP are presented in the next sub-sections.

5.2 NATIONAL POLICY FRAMEWORK

5.2.1 *The Resilient Urban Sierra Leone Project Resettlement Policy Framework 2021*

The objective of this document is to provide guiding principles for the implementation of the Resilient Urban Sierra Leone Project (RUSLP) to ensure timely, adequate and efficient roll out of activities in ways that will avoid, minimize, and compensate for all adverse impacts before project implementation. It provides the mandatory basis for developing site-specific resettlement instruments (Resettlement Plans), which will be developed as appropriate for subprojects (project components) that lead to resettlement. The RPF is prepared in accordance with the legal system, laws and procedures of Sierra Leone, in conformity with World Bank's Environment and Social Framework (ESF), especially Environment and Social Standard Five (ESS 5), which provides the requirements for project Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement.

Property Valuation and Compensation

All affected properties shall be evaluated to determine the overall Compensation payable as part of the assessment of resettlement related issues under the RUSLP. The scope of the valuation covers land, structures and crops/economic trees on the project sites to be affected. Loss of income or disruptions to livelihoods are considered as far as it may be appropriate for payment of compensation for the period of disruption of land, structures, livelihood, and businesses. The basis of the valuation will be the Full Replacement Cost for immovable assets in accordance with the World Bank's new Environment and Social Framework (ESF), especially ESS 5; the National Lands policy 2015; and the Constitution of Sierra Leone. The Department of Housing under the Ministry of Land, Housing and Country Planning (MLHCP), together with the Survey Department under the Ministry of Works and Public Assets (MWPA), will be requested to value affected assets/properties based on the full replacement cost principle (which includes transaction cost such as any fees or transfer taxes, cost of registration of titles, and transport costs, etc.). The types of compensation for use in the implementation of the RPF include cash payment and in-kind compensation.

Relevance to the project:

The RUSLP Resettlement Framework establishes the processes and procedures for all resettlement related issues across the project. Since the market upgrade has components of resettlement, then the framework is applicable to this investment.

5.2.2 *Sierra Leone's Medium-Term National Development Plan 2024 – 2030*

A Transformative Acceleration Agenda for Food Security, Human Capital Development and Job Creation.

Sierra Leone has implemented four comprehensive national development plans (NDPs) following the official end of the country's civil war in 2002. These plans are the Poverty Reduction Strategy Paper, PRSP 2005-2007; the Agenda for Change, PRSP 2008-2012; the Agenda for Prosperity, PRSP 2013-2018; and the Medium-Term National Development Plan, (MTNDP) 2019-2023 which is still being applied and has not yet been superseded by a new planning document. Over the past two decades, albeit amid stiff challenges and multiple setbacks, each of these development agendas have been able to gradually propel the country in the direction towards reducing poverty and setting the stage to achieve sustainable development through investment in the country's workforce, building of strong democratic and revenue generation institutions, diversifying the economy, and the maintaining of peace, among other interventions. One of the key lessons learnt in the implementation of the previous plans is that the plans were designed mainly to align with the country's political term limits without serious long-term implications. This has significantly undermined the achievement of some critical development milestones over the past two decades.

This current national development blueprint, which is Sierra Leone's fifth NDP, is scheduled to be implemented over the period spanning 2024 to 2030. This approach will not only ensure that this NDP has a long-term focus, but will also ensure it is strategically aligned with other global development agendas, especially the United Nations 2030 Agenda and the Sustainable Development Goals (SDGs). The plan is also aligned with key human development, economic and environmental sustainability targets scheduled to be achieved by 2030 in the AU Agenda 2063 as well as the targets of ECOWAS Vision 2050. The overall objective of this approach is to generally ensure sustained and coherent development focus and engagement for effective socioeconomic transformation of the country.

Relevance to the project:

The upgraded markets will increase revenue and the construction activity itself will enhance job creation (albeit temporary), which is part of the plan. Every development activity between 2024 and 2028 should be aligned with the provisions of the MTNDP, hence the plan is very relevant to the project.

5.2.3 *National Social Protection Strategy. for Sierra Leone 2022-2026*

The National Social Protection Strategy for Sierra Leone 2022-2026 (NSPS) is designed to strengthen the strategic vision and direction of the social protection sector; an integrated National Social Protection Strategy is critical for Sierra Leone. This Strategy, the result of a national consultation process facilitated by international social protection experts, outlines the strategic priority areas for the next five years (2022-2026) to meet the policy objectives laid out in the NSPS.

First, it outlines the programmes needed to reach policy objectives and strategic targets, reaching priority groups of the population within the MTNDP. the Government declared its commitment to developing a solid national social protection system and delivering quality social protection services to the population to enhance human capital, age-appropriate social protection services incorporating considerations of disability, gender- and child-sensitive social protection, including coverage targets which would enable achievement of the policy objectives.

Second, it considers how to operationalize those programmes to meet the policy objectives through setting systems strengthening targets to ensure coherent, coordinated, and effective implementation of social protection programmes in Sierra Leone.

This includes tools such as a single social registry, a GRM, shock-responsive capacity, linkages with and referrals to social services, capacity strengthening, a monitoring and evaluation framework and coordination mechanisms.

Finally, it outlines the costs of the Strategy as a whole, including systems strengthening and programmes, and based on scenarios modelled with selected levels of coverage of priority groups, benefit levels and comprehensiveness of programming to inform progressive realization of the NSPS vision of universal coverage by 2040.

Relevance to the project:

The strategy is based on the provision of social protection and basic social services for every resident in Sierra Leone. The market upgrade will provide improved water and sanitation, waste management and cold room facilities which are basic social services; in addition, it will be situated within a secured boundary wall and the buildings fitted with fire alarms and cameras, which will enhance the protection of its constituency (women and children). Hence, the facilities will be provided in line with the requirements of the social protection strategy.

5.2.4 National Land Policy 2005

The Land National Policy of 2005 makes provision for the fair and adequate compensation of land taken for project or national development. The Policy provides for compulsory acquisition of private land in the public interest. It states that compensation for land should be fair and adequate and will be paid in a reasonable time. A draft Resettlement Policy, a legal and administrative framework for the preparation of Resettlement Plans (RPs) is still undergoing the ratification process in the Parliament.

5.2.5 National Land Policy (2005, amended in 2015)

The new National Land Policy presents the mechanisms for the administration of, management, control, planning and execution of land matters in Sierra Leone. The Policy aims at the judicious use of the nation's land and its entire natural resources by all sections of Sierra Leone society in support of various socio-economic activities undertaken in accordance with sustainable resource management principles. The principles of the land policy include among others: 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. This principle only holds where it does not violate existing rights of private ownership; 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; and 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.

Relevance to the project:

Since the market is on parcels of land located in the provinces, they are governed by the customary law land tenure system which is different from the Western Area. This system establishes that the original land owners of all land in the provinces is either the community (public land) or families (private land); therefore, the market land must be originally owned by either the community or a family prior to its transfer to the Local Council. The Land Policy requires the registration of all lands and documenting the transaction and transfer of ownership from either the community or a land owning family to the Local Council.

5.2.6 National Referral Protocol on Sexual and Gender-Based Violence (SGBV) 2022

In response to high rates of SGBV in Sierra Leone and recognizing the complexity of delivering survivor-centered responses, the Government of Sierra Leone produced the 2012 Gender-Based Violence National Referral Protocol (GBV NRP, 2012). The GBV NRP 2012 was a technical guidance document developed to ensure that survivors of SGBV, including children, receive free, prompt and coordinated responses from service providers including free medical care, legal advocacy and advice, and psychosocial support from the point at which the report is made to beyond the time when the legal case is completed. Significant changes in the legal, political, policy and cultural environment in Sierra Leone have taken place since 2012, most notably the launch of the National Strategy for Response to Sexual and Gender Based Violence (SGBV) (Annex 1) in December 2021. This reinforces the importance of delivering SGBV response in a way that prioritizes the dignity, needs, and wishes of the survivor. There is now a need to revise the NRP to ensure it is more survivor-centered and that services are effective, coordinated, child-friendly, gender-sensitive, and disability-inclusive.

The 2022 NRP incorporates the National Guidelines linking four key hotlines: a) 116 SGBV VAC Hotline, b) 112 police and ambulance services, and c) 117 health (Annex 2). The 2022 NRP also reflects changes within the Ministry Departments and Agencies (MDAs), such as the recently created ministries and institutions which have a stake in GBV prevention, reporting, response and service provision in Sierra Leone.

The 2022 NRP is updated to reflect developments in child protection and education policy frameworks that strengthen SGBV prevention and response at all levels. The updated NRP also ensures disability mainstreaming, which is essential to adhere to best practices and to enable the collection and management of disability-related data by age, gender and type

of disability, in accordance with the questions set out by the Washington Group on Disability Statistics and supported by the evaluation of the Child and Adult Functioning Models.

Relevance to the project:

The market upgrade construction works will attract influx of labour and interaction between men and women, which incurs a high potential risk of sexual exploitation and harassment of women and girls in the market and its vicinity. This policy gives a framework on how these issues can be handled whenever and wherever they occur, hence its relevance to the project.

5.3 CONSTITUTIONAL, LEGISLATIVE AND REGULATORY PROVISIONS

Several instruments in the form of Acts, policies and regulations, including the 1991 constitution govern land acquisition and resettlement relation to developmental projects in Sierra Leone.

5.3.1 The Constitution of Sierra Leone

The 1991 constitution makes provision for the government to pursue social protection and prosperity for its people through the harnessing and management of all natural resources, and protects individuals from deprivation of interest or right over property of any kind. It secures and guarantees private ownership and enjoyment of property. However, section 21 of the constitution makes provision for compulsory acquisition of private properties under the condition that it promotes the public welfare of the citizens of Sierra Leone. Any acquisition of property in line with section 21 must be accompanied by prompt payment of adequate compensation, as well as providing the individual(s) access to the court or other impartial and independent authority for the determination of the entitled by person interest or right, and the amount of any compensation to which s/he is entitled and for the purpose of obtaining prompt payment of that compensation. However, the constitution does not make provision for the development of a Resettlement Plan (RP).

CHAPTER III – Section 15. Whereas every person in Sierra Leone is entitled to the fundamental human rights and freedoms of the individual, that is to say, has the right, whatever his race, tribe, place of origin, political opinion, colour, creed or sex, but subject to respect for the rights and freedoms of others and for the public interest, to each and all of the following— a) life, liberty, security of person, the enjoyment of property, and the protection of law; b) freedom of conscience, of expression and of assembly and association; c) respect for private and family life, and d) protection from deprivation of property without compensation;

Except with his own consent, no person shall be hindered in the enjoyment of his freedom of expression, and for the purpose of this section the said freedom includes the freedom to hold opinions and to receive and impart ideas and information without interference, freedom from interference with his correspondence, freedom to own, establish and operate any medium for the dissemination of information, ideas and opinions, and academic freedom in institutions of learning.

Protection of freedom of assembly and association. Protection from discrimination:

Except with his own consent, no person shall be hindered in the enjoyment of his freedom of assembly and association his right to assemble freely and associate with other persons and to

form or belong to any political party, trade unions or other economic, social or professional associations, national or international, for the protection of his interests.

Relevance to the project:

The Constitution is the document that regulates the actions and inactions of all residents in Sierra Leone; therefore, every activity undertaken in Sierra Leone is regulated by the Constitution, including the right to have an ideal and comfortable selling space, the protection of traders, etc.

5.3.2 Land Tenure and Ownership

Land administration in Sierra Leone is governed by a dual system of law, dispersed in about twenty statutes and regulations. In the Western Area of Sierra Leone, land tenure is governed by Property Statutes. Land is either State (publicly) owned or privately owned. The right of the state to public land is inalienable and indefeasible. Rights of occupation over public land may be granted under the warrant. The state has the power, conferred by the Unoccupied Lands Act, cap 117, to take possession of unoccupied land. In the provinces, customary law co-exists with statute. The recognition of the force of customary law in the provinces is established by section 76 (1) of the Courts Act 1965. Through customary law, ownership of land is vested in the chiefdoms and communities: it can never be owned freehold. Land always belongs to the communities under the different forms of tenure under customary law. This principle is established by the Chiefdom Councils Act as well as by Section 28 (d) of the Local Government Act 2004.

Relevance to the project:

The land tenure determines and distinguishes between the dual systems of land ownership in the Western Area and the provinces. Since the current market is being constructed on parcels of land that are situated in the provinces, it establishes that those lands are still owned by the communities even though they have been ceded to the municipalities for the construction of the markets. Establishing land ownership is very relevant to the project.

5.3.3 National Development Induced Resettlement Act 2023

This is an act to introduce uniform principles to guide the planning, implementation and monitoring of Development Induced Resettlement Activities and to provide for other related matters.

Part I defines an Affected Person.

Part IV – Section 12 (a) states that Resettlement shall be avoided at all cost and where it is unavoidable, it should be undertaken in a manner that will cause minimal disruption of the affected persons.

Part IV Section 12 (f) of the Act requires resettlement shall to be carried out only after affected persons have been provided with full and fair compensation for incurred tangible and intangible losses.

Part IV – Section 13, Sub-Section XIV addresses resettlement impacts on vulnerable groups.

Part V – Licenses Resettlement Impact Assessment and Management Plan:

Section 12 (K) requires that resettlement will only be carried out after the development and approval of a risk appropriate resettlement management plan.

Section 14) requires that any person should not undertake a project that will lead to resettlement unless he/she holds a license issued under the Development Induced-Resettlement Act.

Part VI Section 13 Subsection (XXVIII) requires that a comprehensive framework for redressing grievances and resolving disputes that may arise in respect of the planning, implementation and monitoring of resettlement activities is established before the implementation of resettlement activities.

Part VI- Section 30 requires the proponent of a development project to bear all the responsibilities relating to the planning, implementation and monitoring of resettlement and upgrade activities approved under the resettlement management plan. An authorized officer shall monitor and inspect all licensed project to assess their impacts on affected persons and to ascertain compliance with the Act.

Part VII (Compensation Framework), Section 34 Subsection 1 stipulates that any person affected by a development project shall have the right to payment of full compensation.

Part IV, Section 12 (e) stipulates disclosure of information, regular consultation and informed participation as part of resettlement planning and implementation.

Relevance to the Project:

This is the overarching regulation that deals with the procedures of executing resettlement due to development projects. The Act requires the conduct of proper assessment of potential effects of resettlement on affected persons and determines the ideal compensation framework. The Act clearly requires compensation to be paid prior to the commencement of the development. The market upgrade will induce resettlement of traders which should be done in compliance with the Act, hence the relevance of the Act to the project.

5.3.4 Environment Protection Act 2022

EPA Act 2022 - Part VI Section 28 sub-sections: (1) The Agency shall, on receiving an environmental impact assessment from an applicant under section 27, publish the approved report on the Agency's website or newspaper, for inspection and comments of the public, including relevant Government Ministries, professional bodies or associations and non-governmental organizations. (2) Public comments on an environmental impact assessment under subsection (1) shall be submitted to the Executive Chairman within 14 days of the last publication on the website and newspaper.

Relevance to the project:

This Act requires the conduct of environmental impact assessment to determine the potential risks to the environment and people due to the activities of an investment/undertaking. The market upgrade has both negative and positive impacts and these should be identified, assessed and mitigated in line with the requirements of the Act. This Act is relevant to the project since after screening it, the preparation of an ESIA and ESMP was found to be required.

5.3.5 *Sierra Leone Small and Medium Enterprises Development Agency Act, 2016*

Being an Act to provide for the establishment of the Small and Medium Enterprises Development Agency, to create a conducive environment within which Small and Medium Enterprises can thrive and operate, to provide for Sierra Leone's fiscal, monetary and banking policy, trade and industry, technology, marketing, infrastructural and institutional development, and for other related matters.

Part III Section 12. (1) The object for which the Agency is established is to promote a conducive business environment including an efficient and effective service delivery network to empower and develop Small and Medium Enterprises for growth, productivity and competitiveness. Sub section (2) states: Notwithstanding the generality of subsection (1) the agency shall (a) design and implement development support programmes and schemes for Small and Medium Enterprises; (b) facilitate, assist and provide market access and business linkage opportunities to Small and Medium Enterprises to enable them to compete successfully in national and international markets.

Relevance to the project:

Most of the traders in Makeni market fall under the category of small and medium enterprises, and the Act regulates and supports the activities of this bracket. The upgraded markets will avail favorable conditions to traders in the market and will attract the attention of the Agency to help in creating conducive environments (support and policies) for the traders. Hence the relevance of this Act to the project.

5.3.6 *Independent Commission for Peace and National Cohesion Act, 2021*

Being an Act to provide for the establishment of the Independent Commission for Peace and National Cohesion; to confer on the Commission the power to take measures to prevent, manage and resolve conflicts; to build, promote and maintain sustainable peace in Sierra Leone; and to provide for other related matters. Part III – Functions and powers of the Commission Section 12. Functions and powers of the Commission sub section (1) The function of the Commission is to undertake measures to prevent, manage and resolve conflicts, to build, promote and maintain sustainable peace in Sierra Leone and to advise the Government of Sierra Leone on all aspects of conflict resolution and peace. Subsection (2) Without prejudice to the generality of subsection (1) the Commission shall have responsibility to— (a) promote peace, reconciliation and unity in Sierra Leone; (b) build peace cultures, enhance tolerance and support peaceful resolution of conflicts throughout Sierra Leone; (c) monitor and evaluate the implementation of the Truth and Reconciliation Commission recommendations and adopt measures to promote and facilitate full implementation of the recommendations; (d) advise Government on the formulation and implementation of policies relating to peacebuilding, conflict prevention and conflict resolution; (e) develop programmes and provide services that promote awareness activities in local communities, schools, and local administration to promote conflict prevention and conflict resolution;

Relevance to the project:

There is tendency for riotous conduct and the threat of peaceful cohesion in this market. The Act establishes the Peace Commission which has the responsibility to promote peace across the country; the Act gives the Commission the responsibility to persuade citizens to co-exist peacefully, including in the market settings.

5.3.7 *Right to Access Information Act 2023*

Part II Section 11 subsection 1(c) of the Act stipulates the following: Before initiating any project or formulating any policy, scheme, program or law, publish or communicate to the public in general or to the persons likely to be affected by it in particular, the facts available to it or to which it has reasonable access which in its opinion should be known to them in the best interests of natural justice and promotion of democratic principles; 1 (d) - unless there are good reasons to the contrary, allow members of the public to attend its meetings at which decisions affecting them are made, and give adequate notice of the meetings.

Relevance to the project:

The Act requires consultation with all relevant stakeholders prior, during and after any investment or activity that will affect them. For the market upgrade, the affected traders and their union representatives must be engaged in every step of the process including the relocation activities. This Act is thus very relevant to the project.

5.3.8 *National Revenue Authority Act 2022*

An Act provided for the existence of the National Revenue Authority as a central body responsible for the assessment and collection of taxes and specified revenues; to provide for the administration and enforcement of specified revenue laws and to provide for other related matters

Part III Section 15 (1): the Authority will administer and enforce revenue laws promulgated for the assessment and enforcement of collection of revenue on behalf of the government.

Section 2 (c): the authority will formulate and implement plans for developing an effective and fair and efficient revenues collection system and (e) advise the government on matters of policy relating to revenues whether arising from any law set out in the schedule.

Relevance to the project:

The Act gives the National Revenue Authority to establish and enforce tax revenue laws which are applicable to traders; these laws will impact the performance of traders, if there are unfavorable tax hikes, it will affect commodity prices and hence will impact the traders' revenues and businesses in the market.

5.3.9 *National Land Commission Act 2022*

Being an Act to provide for the establishment of the National Land Commission, the District Land Commission and other land administrative bodies to secure effective and holistic land administration and to provide for other related matters. Section 59 subsection 2 requires the establishment of an inventory of state, private and community land across the country.

Part XI, Section 77:

Subsection (1): The Commission shall establish a Grievance Redress Mechanism whereby a person can challenge decisions of the Commission in respect of land for which he/she has a right or claim;

Subsection (2): any grievance redress mechanism established by the Commission shall be effective, accessible and affordable to all, and provide prompt resolution of an enforcement of outcomes of disputes over tenure rights.

Subsection (3): Where a person is deprived of a land tenure right by the Government for a public purpose, compensation shall be provided to that person irrespective of the resolution provided by any grievance redress mechanism established by the Commission.

Section 78, Subsection (1): The Commission shall set up within each chiefdom Land Committee, a subcommittee to be known as the Land Adjudication Tribunal.

Relevance to the project:

The Land Commission Act requires that all pieces of land in every corner of Sierra Leone should be registered under the Land Commission that was established by the Act; the Commission will establish a national land register which may include all the relevant information of any parcel of land at local and national level. This is applicable to the current market plots and the relocation site in Makeni.

5.3.10 Customary Land Right Act 2022

Being an Act to provide for the establishment and protection of customary land rights, the elimination of discrimination under customary law, and the management and administration of land subject to customary law and to provide for other related matters. Part III Section 5 (1) and (2) of the act guarantee equal right to own, hold, use, inherit, succeed or deal with land under customary law and nullifies any law that excludes, inhibits women from owning, holding, using or transferring and inheriting land.

Relevance to the project:

The current market and relocation site initially belong to landowning households prior to handing them to the local councils; there exist adjacent lands in these locations which may be possibly acquired for the extension of the market or to allow for the installation of hoardings during the construction period. The rights of owners of such properties are guaranteed under the Customary Land Act.

5.3.11 The Town and Country Planning Act 1948

This Act defines the rules for the definition of Planning Areas and Schemes. Cap 81, Part IV, n°25 gives rights to any person whose property is seriously affected by a scheme or by the execution of any work under a scheme to be compensated by the amount by which his property is decreased in value under the condition that he makes a claim within a certain limited time (to be clarified based on engagement with Government for the RP). If the person is dissatisfied with the compensation received, he is allowed to appeal to the Supreme Court. Final judgment is subject to appeals applicable to the Supreme Court.

Relevance to the project:

The Act regulates planning, which is relevant to the project, because it ensures that construction of various infrastructures should be done within planned areas. Therefore, the requirements of the Act are applicable to the selection of the location of the markets and relocation site.

5.3.12 *The Public Health Act 2022*

It is an Act to provide for the promotion, protection and improvement of public health and wellbeing in Sierra Leone and to provide for the protection of individuals and communities from public health risks, to provide for the prevention and control of the spread of infectious diseases, to provide for local government and community participation in protecting public health, to provide for early detection of and prompt response to diseases and public health threats, and to provide for other related matter.

Section 3 subsections 1 2 and 3 requires the local council to promote community involvement in health issues and providing information, education and communication to promote healthy lifestyles within a locality, provide environmental health care within its locality including preventing the occurrence of health nuisance, unhygienic offensive or insanitary or other conditions which could be harmful or dangerous to human health, such as preventing the pollution of water intended for human and animal consumption.

Part IX Section 88 requires a health authority to appoint public places within its jurisdiction to be used as public markets.

Relevance to the project:

The Act gives the Health Authority the power to determine the location of public markets, it also gives an indication of ideal places to sell food stuff (such as butchery and fish products), most sections of the Act are applicable to the market upgrade and its relocation site. It also aims to prevent the occurrence of health nuisance, unhygienic offensive or insanitary or other conditions which could be harmful or dangerous to human health in the market.

5.3.13 *The Sexual Offences Act, 2012*

Being an Act to consolidate with amendments of the law relating to sexual offences.

PART II Section 6. A person who intentionally commits an act of sexual penetration with another person without the consent of that other person commits the offence of rape and is liable on conviction to a term of imprisonment not less than five years and not exceeding fifteen years. Section 7. A person who intentionally, without the person's consent (a) touches that person in a sexual manner, or (b) compels that person to touch the accused person in a sexual manner, commits the offence of indecent assault and is liable on conviction to fine not exceeding Le5 million or a term of imprisonment not exceeding five years.

Relevance to the project:

The market upgrade construction works will attract influx of labour, which incurs a high potential risk of sexual exploitation and harassment of women and girls in the market and its vicinity. The Sexual Offence Act has indicated punitive measures and sanctions for such actions, hence its relevance to the project.

5.3.14 *The Local Government Act, 2022*

Being an Act to consolidate with amendments, the law on local government, and to provide for the decentralization and devolution of functions, powers and services to local councils and for other matters connected therewith.

PART V – Section 20. (1) A local council shall be the highest political authority in the locality and shall have legislative and executive powers to be exercised in accordance with this Act or any other enactment, and shall be responsible, generally for promoting the development of the locality and the welfare of the people in the locality with the resources at its disposal and with such resources and capacity as it can mobilize from the central government and its agencies, national and international organizations, and the private sector.

(2) Without prejudice to the generality of subsection (1), it shall be the function of a local council to (a) mobilize the human and material resources necessary for the overall development and welfare of the people of the locality; (b) promote and support productive activity and social development in the locality; (c) initiate and maintain programmes for the development of basic infrastructure and provide works and services in the locality.

PART XII Section 90. (1) A local council may make byelaws not inconsistent with the Constitution or this Act or any other enactment for the purpose of any function conferred on it by or under this Act or any other enactment.

Relevance to the project:

The Act gives the authority to the Local Councils to plan and undertake development projects in their jurisdiction. The markets upgrade subprojects were part of the development plans of both municipalities. In addition, the upgraded markets will increase revenue for the municipalities.

5.3.15 Appropriation Act 2024

Being an Act to authorize expenditure from the consolidated fund for the services of Sierra Leone in the year 2024 and for other related matters. The act makes it necessary to make provision for issue from the consolidated fund of sums of money necessary to meet the expenditure to carry on the services of the Government. Note 3 of the act allocated 0.04% contingency fund for expenses that are not catered for in the Act. Should the government fund be required to pay for resettlement in this project, these funds are applicable for such investments.

Relevance to the project:

The Act regulates government yearly spending which includes allocation to the municipalities. The municipal administration can use funds from their yearly allocation to maintain the upgraded markets; this will only be possible when funds are appropriated to the municipalities under the Appropriation Act.

5.3.16 The Borrowers and Lenders Act, 2014

Being an Act to provide the legal framework for credit agreements, to improve standards of disclosure of information in credit agreements, to prohibit certain practices, and promote consistency in the enforcement of credit agreements and to provide for other related matters.

Section 2. (1) This Act shall apply to (a) security interests (i) in movable property created by a credit agreement, regardless of the form of the transaction, the type of movable property or

the nature of the secured obligation; Part II Section 4. (1) For the purposes of this Act, the Bank shall:

(a) promote the development of a fair, transparent, competitive and accessible credit market throughout Sierra Leone; (b) monitor the credit market throughout Sierra Leone in order to detect and prevent any conduct prohibited by this Act; (c) receive complaints in writing about alleged contraventions of this Act.

Relevance to the project:

The Act regulates the relationship between lenders and borrowers. Most of the traders rely on loans and other forms of micro-credit from lending organizations. The upgraded markets will eventually lead the traders to add on their wares and hence will attract more lenders. The Act is meant to regulate this relationship.

5.3.17 *The Traffic Act 2016*

The act designated a "footway" as a way comprised in a road which also comprises a carriageway, being a way over which the public have a right of way on foot only and established that a footpath is not part of the road, it is only reserved for pedestrians.

Section 121 (2) stipulates that a motorist is liable to a fine for causing danger to road users.

Section 131 prohibits a motorist from a person from driving a motor vehicle (a) on to or upon land which is not a road; or (b) on any road which is a footpath or a pedestrian walkway.

PART XI – Section 117. (1) A person who parks a motor vehicle wholly or partly (a) on the verge or shoulder of a road; (b) on any land situated between two carriageways and which is not a footway; (c) on a footway; (d) on a pedestrian crossing; or (e) on a place reserved for the physically challenged.

Relevance to the project:

The relocation site in Makeni is mostly on existing roads, which has the potential to attract traffic around its periphery. In addition, most of the traders and buyers do walk to the market. The protection of the traders and buyers from potential accidents due to the existence of the market and relocation site is paramount; the Act regulates the relationship between the motorist and pedestrians, hence its relevance to the project.

5.3.18 *The Child Rights Act, 2007*

Being an Act to provide for the promotion of the rights of the child compatible with the Convention on the Rights of the Child, adopted by the General Assembly of the United Nations on 20 November 1989, and its Optional Protocols of 8 September, 2000; and the African Charter on the Rights and Welfare of the Child, and for other related matters.

Section 26. (1) No parent shall deprive a child of his welfare whether (a) the parents of the child are married or not at the time of the child's birth; or (b) whether the parents of the child continue to live together or not. (2) Every child has the right to life, dignity, respect, leisure, liberty, health, including immunization against diseases, education and shelter from his parents.

Relevance to the project:

The market setting involves a high number of women and their kids; traders often instruct children to help them with the trading activities, which is a violation of the right of the child. This is forbidden under the Act; therefore, the Act is very relevant to the market upgrade subject in preventing the employment and abuse of children.

5.4 INTERNATIONAL FRAMEWORK

The World Bank's Environmental and Social Standard on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS 5) applies to permanent or temporary physical and economic displacement resulting from land acquisition or restrictions on land use undertaken or imposed in connection with the project's implementation.

The World Bank's Land Acquisition, Restrictions on Land Use and Involuntary Resettlement requirements as embedded in ESS5 outline the conditions under which the World Bank will fund a project if it displaces people or affects their social and economic wellbeing.

5.4.1 Policy Objectives

The objective of the Bank's Resettlement Policy is to ensure that the population displaced by a project receives benefits from it. The policy has the following key objectives:

- To avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives;
- To avoid forced eviction;
- To mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement cost; and (b) assisting PAPs in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher;
- To improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure;
- To conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable PAPs to benefit directly from the project, as the nature of the project may warrant; and
- To ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected.

According to World Bank's ESS 5, the resettlement plan should include measures to ensure that PAPs are:

- Informed about their options and rights pertaining to resettlement;
- Consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives;
- Provided prompt and effective compensation at full replacement cost for losses;
- Aided (such as moving allowances) during relocation; and

- Provided with residential housing, or housing sites, (in the context of this case, market sites) for which a combination of productive potential, location advantages and other factors is at least equivalent to the advantages of old sites.

Where it is necessary to achieve the objectives of the resettlement plan, it should also ensure that PAPs are:

- Offered support after displacement, for a transition period, based on a reasonable estimate of the time likely to be needed to restore their livelihood and standard of living; and
- Provided with development assistance in addition to compensation measures, such as relocation market site preparation, training, or job opportunities.

5.4.2 *Similarities Between the Government of Sierra Leone Regulatory Framework, and World Bank's ESS5*

The Government of Sierra Leone and World Bank requirements are found to converge on the following points:

- Avoidance of involuntary resettlement wherever feasible, and minimization of resettlement where population displacement is unavoidable by exploring all viable project options;
- Compensation at replacement cost (replacement cost of an affected asset is equivalent to the amount required to replace the asset in its existing condition);
- Assistance to the PAPs for relocation;
- Assistance to the PAPs to improve their living standards, capacity for income generation, and production levels, or at least to restore them to their former levels;
- Participation of all stakeholders;
- Consultations with PAPs at every stage; and
- Grievance redress mechanisms for PAPs.

The table below provides a summative comparative analysis of the World Bank ESS5 and the Regulatory Framework of Sierra Leone.

Table 5-1 Comparative Analysis of the World Bank ESS5 and the Regulatory Framework of Sierra Leone

World Bank ESF	National Regulation	Comparison	Gap filling measures
<p>Eligibility classification</p> <p>10. Affected persons may be classified as persons:</p> <p>(a) Who have formal legal rights to land or assets.</p> <p>(b) Who do not have formal legal rights to land or assets, but have a claim to land or assets that is recognized or recognizable under national law; or</p> <p>(c) Who have no recognizable legal right or claim to the land or assets they occupy or use.</p>	<p>The National Development-Induced Resettlement Act 2023 (NDIR), Part 1 defines Affected Person as a person who as a result of a qualifying project or activity loses or is likely to lose either in full or in part, permanently or temporarily, the right to own, use or otherwise benefit from all or part of physical or non-physical assets, including home, community, land resources, important cultural resources, important cultural sites, commercial properties, tenancy, income earning opportunities, and social or cultural networks and activities</p> <p>Part IV – Section 13 Subsection (XIV): resettlement accounts for and gives particular attention to the specific impacts of resettlement on vulnerable groups.</p>	<p>The Act fully addresses the eligibility criteria</p>	<p>Can use both the ESS 5 and the National Act</p>
<p>Involuntary resettlement should be avoided wherever possible, or minimized, exploring all alternatives</p>	<p>Part IV, Section 12 (a) of the NDIR states that Resettlement shall be avoided at all cost and where it is unavoidable, it should be undertaken in a manner that will cause minimal disruption of the affected persons</p>	<p>The Act fully addresses the ESS requirement</p>	<p>Can use both the national regulation and the ESS</p>
<p>Project design</p> <p>11. The Borrower will demonstrate that involuntary land acquisition or restrictions on land use are limited to direct project requirements for clearly specified project purposes within a clearly specified period of time. The Borrower will consider feasible alternative project designs to avoid or</p>	<p>The NDIR 2023 Part V – Licenses Resettlement Impact Assessment and Management Plan</p> <p>14). A person should not undertake a project that will lead to resettlement unless he holds a license issued under the Development Induced-Resettlement Act</p>	<p>The Act fully addresses the ESS requirement</p>	<p>Can use both the national regulation and the ESS</p>

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

LEGAL FRAMEWORK

World Bank ESF	National Regulation	Comparison	Gap filling measures
minimize land acquisition or restrictions on land use, especially where this would result in physical or economic displacement, while balancing environmental, social, and financial costs and benefits, and paying particular attention to gender impacts and impacts on the poor and vulnerable.	<p>16). (2) In deciding to grant a RP License, the Minister should take into consideration:</p> <p>a) the principles guiding development-induced resettlement and how they should be applied</p> <p>b) the potential nature and magnitude of the development-induced displacement, including:</p> <p>i) the total number of affected persons and vulnerable persons</p> <p>ii) the extent of physical and economic displacement</p> <p>iii) the extent of involuntary displacement</p> <p>iv) the location and scale of the project area</p> <p>v) the potential impact on host communities.</p> <p>Part IV Section 13 (a) (ii) states that; where is not possible to avoid resettlement, the negative impacts are minimized by establishing appropriate mitigation measures or alternatives in the design and implementation of the project.</p>		
<p>Compensation and benefits for affected persons</p> <p>12. When land acquisition or restrictions on land use (whether permanent or temporary) cannot be avoided, the Borrower will offer affected persons compensation at replacement cost, and other</p>	<p>Part VII Compensation Framework</p> <p>Section 34 subsections.</p> <p>1). Any person affected by a qualifying project shall</p>	The Act fully addresses the ESS requirement	Can use both the national regulation and the ESS

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

LEGAL FRAMEWORK

World Bank ESF	National Regulation	Comparison	Gap filling measures
assistance as may be necessary to help them improve or at least restore their standards of living or livelihoods, subject to the provisions of paragraphs 26 through 36 of this Environmental and Social Standard.	<p>have the right to payment of full compensation.</p> <p>2). Compensation due under the Act shall:</p> <p>a) seek to restore or improve the economic condition and social wellbeing of affected persons including their standard of living, income earning capacities and their socio-cultural circumstances;</p> <p>b) not be limited to monetary compensation and may include in-kind compensation support or resettlement as is fair and adequate;</p> <p>c). be paid prior to the commencement of the project if the compensation is monetary</p>		
15. The Borrower will take possession of acquired land and related assets only after compensation in accordance with this ESS has been made available and, where applicable, PAPS have been resettled and moving allowances have been provided to the PAPs in addition to compensation. In addition, livelihood restoration and improvement programs will commence in a timely fashion to ensure that affected persons are sufficiently prepared to take advantage of alternative livelihood opportunities as the need to do so arises.	<p>Part IV Section 12 (h) of the NDIR Act states that resettlement shall only take place after the establishment of a framework for the independent monitoring, evaluation and reporting on the planning and implementation of the resettlement activities.</p> <p>Subsection k states that resettlement shall only be carried out after the development and approval of a risk appropriate resettlement management plan.</p> <p>Subsection (f) of the NDIR Act 2023 requires resettlement to be carried out only after affected persons have been provided with full and fair compensation for incurred tangible and intangible losses</p>	The Act fully addresses the ESS requirement	Can use both the Act and the ESS

World Bank ESF	National Regulation	Comparison	Gap filling measures
<p>Community engagement.</p> <p>The Borrower will engage with affected communities, including host communities, through the process of stakeholder engagement described in ESS10. Decision-making processes related to resettlement and livelihood restoration will include options and alternatives from which affected persons may choose. Disclosure of relevant information and meaningful participation of affected communities and persons will take place during the consideration of alternative project designs referred to in paragraph 11, and thereafter throughout the planning, implementation, monitoring, and evaluation of the compensation process, livelihood restoration activities, and relocation process. Additional provisions apply to consultations with displaced Indigenous Peoples, in accordance with ESS7.</p>	<p>According to the NDIR Act 2023, Part VII Section 12 (e) requires that Resettlement planning and implementation shall be carried out with the appropriate disclosure of information, regular consultation and informed participation.</p> <p>Part V section 20 b and 21 (1) requires that public hearing be conducted at every stage of the resettlement planning in order to accommodate public comments on the proposed resettlement activity within the project area.</p> <p>Resettlement shall account for and pay particular attention to the specific impacts on vulnerable groups. In addition, section (I) of the second schedule requires the proponent to discuss the potential resettlement impacts with the affected people and provide project alternatives.</p> <p>Part IV, Section 13 states that the project proponent should ensure that consultations are held in a manner which ensures vulnerable groups are given meaningful avenues for participation in the planning and design, decision making processes, and implementation of resettlement activities.</p>	<p>The Act fully addresses the ESS requirement</p>	<p>Can use both the Act and the ESS</p>
<p>Grievance mechanism</p> <p>19. The Borrower will ensure that a grievance mechanism for the project is in place, in</p>	<p>The NDIR Act, Part VI Section 13 Subsection (XXVIII): A comprehensive framework for redressing grievances and resolving disputes that may arise in respect of the planning, implementation and monitoring of</p>	<p>The Act fully addresses the ESS requirement</p>	<p>Can use both the Act and the ESS</p>

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

LEGAL FRAMEWORK

World Bank ESF	National Regulation	Comparison	Gap filling measures
accordance with ESS10 as early as possible in project development to address specific concerns about compensation, relocation or livelihood restoration measures raised by PAPs (or others) in a timely fashion. Where possible, such grievance mechanisms will utilize existing formal or informal grievance mechanisms suitable for project purposes, supplemented as needed with project-specific arrangements designed to resolve disputes in an impartial manner.	<p>resettlement activities is established before the implementation of resettlement activities.</p> <p>The National Land Commission Act 2022, Part XI, Section 77:</p> <p>Subsection (1): The Commission shall establish a Grievance Redress Mechanism whereby a person can challenge decisions of the Commission in respect of land for which he/she has a right or claim;</p> <p>Subsection (2): any grievance redress mechanism established by the Commission shall be effective, accessible and affordable to all, and provide prompt resolution of an enforcement of outcomes of disputes over tenure rights.</p> <p>Subsection (3): Where a person is deprived of a land tenure right by the Government for a public purpose, compensation shall be provided to that person irrespective of the resolution provided by any grievance redress mechanism established by the Commission.</p> <p>Section 78, Subsection (1): The Commission shall set up within each chiefdom Land Committee, a subcommittee to be known as the Land Adjudication Tribunal.</p>		
<p>Planning and implementation</p> <p>21. To address the issues identified in the environmental and social assessment, the Borrower</p>	Section 12 (K) of the NDIR Act 2023 requires that resettlement will only be carried out after the development and approval of a risk appropriate	The Act fully addresses the ESS requirement	Can use both the Act and the ESS

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

LEGAL FRAMEWORK

World Bank ESF	National Regulation	Comparison	Gap measures	filling
will prepare a plan proportionate to the risks and impacts associated with the project: (a) For projects with minor land acquisition or restrictions on land use, as a result of which there will be no significant impact on incomes or livelihoods, the plan will establish eligibility criteria for affected persons, set out procedures and standards for compensation, and incorporate arrangements for consultations, monitoring and addressing grievances; (b) For projects causing physical displacement, the plan will set out the additional measures relevant to relocation of affected persons; (c) For projects involving economic displacement with significant impacts on livelihoods or income generation, the plan will set out the additional measures relating to livelihood improvement or restoration.	<p>resettlement management plan.</p> <p>Part VI Implementation of Resettlement Activities:</p> <p>30. The proponent shall bear all the responsibilities relating to the planning, implementation and monitoring of resettlement and upgrade activities approved under the resettlement management plan.</p> <p>31. 2) An authorized officer shall monitor and inspect all licensed project to assess their impacts on affected persons and to ascertain compliance with the Act.</p>			

5.4.3 *Differences Between the Government of Sierra Leone Regulatory Framework and World Bank's ESS5*

The law, regulations and requirements for resettlement in Sierra Leone are not fully compatible and there are some differences with that of World Bank ESS 5. In the case of any gaps between the national law and ESS 5, gap filling measures have been identified in the Table below and the provisions that provide the highest protection of the PAPs will be adopted. In such cases of differences, the most stringent provision will apply for the RP.

Comparison of the Sierra Leone legal framework with the World Bank's ESS5 shows the following key differences (see Table 5-2 for analysis and gap filling measures):

- The compensation method used to determine the amount of compensation, which under ESS5 must adhere to the principle of full replacement cost and not market price, where the physical depreciation of assets is taken into consideration;
- National legislation does not recognise informal land use whereas ESS5 does consider payment of compensation for affected/lost assets due to project activities, as long as they were present at the time of the census and before the cut-off date;
- The provision of resettlement assistance (transitional support and livelihood restoration measures) to PAPs is not required under national legislation, although is a requirement under ESS5;
- National legislation does not require additional support to be provided to vulnerable people, or engagement specifically with women, which ESS5 does;
- National legislation does not require the establishment of a project-specific grievance mechanism, although there are formal and informal ways a PAP (or other stakeholder) is able to raise a grievance. For this project, a GRM has been established and is available;
- National legislation does not require specific engagements to be undertaken with women and vulnerable people and
- National legislation does not require a project-specific monitoring and evaluation framework to be established, whereas ESS5 does.

Table 5-2: Differences and Gap Filling Measures between Sierra Leonean Law with World Bank's ESS5

Issue	National Law	ESS5	Gaps	Gap Filling Measures
Calculation of Compensation	Fair and adequate	Full replacement cost	Reference to 'fair and adequate' compensation without appropriate qualification under Sierra Leonean Law makes it subject to manipulation by elites; ESS5 is more precise.	The Full Replacement Cost Approach (RCA) will be adopted for the calculation of compensation.
Informal settlers/ Encroachers/ squatters	No legal provisions are made for entitlements for people without titles to land, i.e., squatters/ encroachers.	People without title may be entitled for transitional allowance to assist them relocate from land that they occupy. People who encroach on the area after the cut-off date are not entitled to compensation or any form of resettlement assistance.	ESS5 provides for compensation to lost assets due to project impact for squatters but Sierra Leonean law does not.	Squatters will be entitled to compensation for investments and assets made on land except for the land itself regardless of legal tenure provided these investments were done before cutoff regardless of legal tenure.
Livelihood restoration and resettlement assistance	No provision. National Law does not specify assistance.	Provide additional targeted assistance (e.g., credit facilities, training or job opportunities) and opportunities to improve or at least restore their income earning capacity, production levels and standards of living to economically displaced persons whose livelihoods or income levels are adversely affected. For a transitional period.	Sierra Leonean law is silent on livelihood restoration as an integral part for resettlement and no planning or resources are allocated to this activity.	Resettlement assistance in terms of moving allowances, loss of earnings etc. will form part of compensation framework, in addition to longer term livelihood development program.

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

LEGAL FRAMEWORK

Issue	National Law	ESS5	Gaps	Gap Filling Measures
Support to vulnerable groups	No legal provision; compensation for expropriated property can be determined.	According to World Bank policy special attention must be given to vulnerable groups. They are entitled to additional compensation, legal assistance during resettlement and help during physical relocation.	No special attention, provisions or treatment are prescribed for vulnerable persons under Sierra Leonean Law.	Particular attention will be made to identify vulnerable, or potentially vulnerable households at time of baseline surveys, for special consideration based on scale of impact.
Public consultation and information disclosure	The owner/tenants on the land must be formally notified at least a week in advance of the intent to enter and be given at least 24-hour notice before actual entry.	Displaced persons and their communities are provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementation and monitoring of resettlement.	ESS 5 provides for continuous consultation while it is prescriptive timeframe in the Sierra Leone law.	Displaced persons and their communities will be provided timely and relevant information, consulted on resettlement options, and offered opportunities to participate in planning, implementation and monitoring of resettlement.
Timing of Compensation Payment	Prompt	Prior to displacement and relocation any physical work planned for the project.	Sierra Leonean law is ambiguous in terms of the exact timing of compensation payment; ESS5 is more precise.	Compensation payments will be done prior to displacement and before any physical work planned for the project.
Payment of Compensation (in cash Vs in kind)	Cash Compensation is based on market value	Entitled to in-kind or cash compensation at full replacement cost including labour and relocation expenses, prior to displacement. Preference should be given to land-based resettlement (land to land) to PAPs whose livelihood is land-based.	Market value is applicable under Sierra Leonean law – inclusive of depreciation and not considering labour, other transactional costs, in-kind compensation or reinstatement.	Compensation payments will be in-kind or cash as agreed with the PAP at full replacement cost including labour and relocation expenses, prior to displacement.
Treatment of residential and business renters (tenants)	Fixed improvements introduced by renters on the land or structures automatically belongs to the landowner, unless there is a specific provision that the owner will compensate the renter for any fixed improvements introduced by	Compensation at full replacement cost for (i) loss of structures/assets other than land; (ii) resettlement assistance; and (iii) other assistance, as may be necessary to restore to pre – project levels at least.	ESS5 provides for compensation for all land tenants but Sierra Leone law subjects any compensation to prevailing laws	Renter will be provided compensation for transfer costs and disturbance, compensation for temporary closure of the business establishment while transfer is ongoing.

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

LEGAL FRAMEWORK

Issue	National Law	ESS5	Gaps	Gap Filling Measures
	the latter. The practice is to ask the landowner to sign a waiver, allowing the renter to be paid compensation for any fixed improvements.			
Grievances Management	The law prescribes the possibility of appealing throughout expropriation phases with statutory limits.	World Bank ESS5 requires that a GRM is established to provide appropriate and accessible avenue for PAPs complaints to be received to facilitate the resolution of any grievance.	ESS5 provides for resolving resettlement through project structures first before the law court	Appropriate and accessible grievance mechanisms to be established before project implementation. Detailed grievance mechanism (GM) in place and articulated through the SEP, with recourse to court of law if need be. The GM will be accessible at no cost, reliable and transparent and will be publicly disclosed.
Monitoring and Evaluation	No provision	Requires monitoring and reporting on effectiveness of RAP implementation and post RAP to ascertain if livelihoods have been restored.	No M&E provision under the Sierra Leone Law.	Detailed monitoring, and evaluation program built into the overall project E&S instruments.

6. INSTITUTIONAL FRAMEWORK

6.1 RP INSTITUTIONAL AND IMPLEMENTATION ARRANGEMENTS

The PMU under the Fiscal Decentralization Division (FDD) of the Ministry of Finance will provide overall oversight for the development and implementation of the RP. It will supervise the establishment of a RP Implementation Committee whose composition shall be determined taking into consideration the nature and type of project.

Table 6-1 outlines the agencies and institutions involved in resettlement activities for the project.

Table 6-1 Stakeholder roles and responsibilities in RP implementation

Entity	Roles and Responsibilities
World Bank	<ul style="list-style-type: none"> - Provides the project's source of financing including funds to pay compensation and the full cost for preparation of the relocation site and the construction of the markets. - Provides project appraisal ensuring that E&S safeguards are complied with during project implementation. - Provides Technical backstopping
Ministry of Finance (MoF)	<ul style="list-style-type: none"> - This Ministry has the broad responsibility for financial management, procurement, and monitoring and evaluation functions of the project. - The PMU under the Fiscal Decentralization Division (FDD) of the MoF will provide overall oversight for the development and implementation of E&S Safeguards, including the RP. - The PMU (having E&S and Gender Specialists) is also responsible for the leading the overall implementation and M&E of the RP; disbursement of funds for compensation and transitional support. The PMU will also facilitate the transition of the affected traders from the current market to the relocation site and back to the completed facilities - Representative of the PMU will be RP Implementation Committee working and leading the E&S activities of the project. -
Makeni City Council (MCC)	<ul style="list-style-type: none"> - Provision of preferred relocation site - Support the implementation of the RP - Serve as a channel to coordinate between project proponents and project affected parties. - Coordinate with the relevant institutions in ensuring the provision of the relevant services for the affected persons
Sierra Leone Roads Authority (SLRA) and Sierra Leone Police (SLP) (Traffic Division)	<ul style="list-style-type: none"> - Management of the public road network, including the installation of temporary road closures to provide a safe area at the relocation site. - Maintaining the safety of traders, workers, and customers attending the market.
RP Implementation Committee	<ul style="list-style-type: none"> - Centrally coordinates the implementation of the RP with the active involvement of other stakeholders. - The resolution of grievances. - The collection of M&E data.
RP Implementation	In coordination with the RP implementation Committee, the implementation

Entity	Roles and Responsibilities
Agency	<p>Agency will have the following functions:</p> <ul style="list-style-type: none"> - Monitor (internally) RP implementation and progress and engage directly with the PAPs; - Supervise the compensation payment process, the provision of transitional support, and implementation of livelihood restoration measures as applicable; - Provide training and capacity building for all entities involved in the RP implementation - Take the lead in raising awareness, recording, investigating and resolving grievances in redressing grievances concerning RP activities; and - Coordinate with concerned government agencies and other stakeholders.
Grievance Redress Committee (GRC)	<ul style="list-style-type: none"> - Established at the PMU and community/ site levels - Established to ensure timely and appropriate resolution of grievances arising as a result of project activities. - The coordination responsibility rests with the Social Safeguards Specialist, and Gender Specialist in coordination with focal persons in the affected communities, local councils, contractor and supervising team and service provider (for SEA/SH).
Environment protection Agency (EPA)	The EPA has the overall responsibility of approving and monitoring the project's compliance with the Approval Conditions as well as other standards relating to the social environment, including this RP.
Sierra Leone Water Company and Electricity Distribution Authority	These institutions have the mandate to provide water and electricity supply to both relocation and upgraded market facilities
The Ministry of Planning and Economic Development (MoPED)	<p>Under the newly enacted National Development Induced Resettlement Act of 2023, MoPED is tasked with overseeing all resettlement project activities that may have resettlement implications and approving the Resettlement Plan. Additionally, the Ministry has established a Resettlement Directorate, which will be involved in overseeing the implementation of the Market Upgrade Resettlement Plan.</p> <p>MoPED requires that any RP related activities, especially physical displacement of PAPs, be included and clearly captured. It requires development of a RP management Plan in addition to the RP Report.</p>
Ministry of Works and Infrastructure	Responsible for the issuance of works guidelines for the construction of the relocation site and the upgrade of the main market.
Ministry of Lands Housing and Country Planning	Responsible for the issuance of building permits for both the upgrade of the main market and the construction of relocation site.
Ministry of Health	Has the responsibility to approve the relocation and market upgrade sites in accordance with the Public Health Act 2022.
Sierra Leone Traders Union	Serves as the focal point for the affected traders; will be responsible for supporting the relocation activities (movement of traders to relocation site). The Union will also serve in the relocation committee.
Contractor	To ensure that a safeguard specialist is employed to monitor and ensure

Entity	Roles and Responsibilities
	compliance with relevant terms stated in the contract and the RP.

A RP implementation Committee will be established before the start of RP implementation, to centrally coordinate and undertake monitoring and evaluation activities during the process. The RP implementation Committee shall comprise representatives from the following:

- MoF;
- Ministry of Lands Housing and Country Planning;
- Ministry of Planning and Economic Development;
- Ministry of Local Government and Rural Development;
- MCC;
- Sierra Leone traders Union;
- A representative of the traders who is tasked with focusing on the needs of vulnerable people.
- A representative of the RP Implementation Agency.

The RP implementation Committee shall be required to sign a Code of Conduct that requires them to always adhere to professional and ethical standards. The RP implementation Committee shall be provided with capacity building support from the RP implementation Agency in the form of a training workshop to be held in Makeni that covers the following topics:

- An overview of the project and the final adopted design;
- The objectives and requirements from ESS5;
- Applicable national legislation;
- Key differences between ESS5 and national legislation and how these were addressed in the RP;
- The ongoing operation of the grievance mechanism;
- The collection of monitoring and evaluation indicators using KPIs; and
- The schedule for RP implementation and immediate next steps.

Thereafter the RP implementation Committee shall meet every 4 weeks at the MCC main building to oversee the ongoing activities, and address challenges as they arise.

As for the independent RP Implementation Agency, it will provide support to the MCC and traders Union in the implementation of the RP. The following are the RP implementation Agency's responsibilities as per the respective TOR (Appendix G):

- To ensure timely, appropriate, and comprehensive implementation of the RP in compliance with applicable national legislation, the World Bank's ESF (ESS5), and the project's Resettlement Policy Framework (RPF).
- To work closely with the MCC, the PMU, supervising consultants, and respective local authorities responsible for land acquisition, resettlement, and compensation in Makeni.
- To ensure proper Compensation disbursement.
- Overall data management, development and maintenance of the RP database.

- Community engagement and liaison, coordination and community engagement/ liaison work on site.
- Implementation of the Livelihood restoration program.
- Collection of M&E indicators defined in Section 15.

7. ELIGIBILITY

An eligibility and entitlement matrix is provided in Table 7-1.

Table 7-1 Eligibility and entitlement matrix

Affected Assets	Type of impact	Entitled units	Eligibility Criteria	Entitlement
Structures	The destruction of immoveable structures	Owner	Owens the affected structure	<ul style="list-style-type: none"> • Compensation at full replacement cost. • Compensation for the cost of moving (e.g. persons/ goods in the structure under or belonging to owner) to a relocation site and then back to the upgraded market after project construction completion, or the provision of a truck and labourers free of charge. (twice – once to the relocation site and then back to the upgraded Makeni central market again). • The right to salvage materials even if they are to be compensated.
		Occupant	Lives in or uses the affected structure for the purpose of living ⁶	<ul style="list-style-type: none"> • The market cost of renting similar structure or at a rate determined by the MLHCP for the period of time that the land the building is on will not be suitable for living due to the market works (estimated at 2 years). • Compensation for the cost of moving (e.g. persons/ goods in the structure under or belonging to user) to a relocation site, or the provision of a truck and labourers free of charge. • Transitional support of 10% of the market cost of renting similar structure or at a rate determined by the MLHCP. [NB: if the owner is same as the occupant, he/she will not be entitled to this transitional support as this would be essentially 'overlap' in relation to the provision of transitional support].
	The destruction of moveable assets	Owner	Owens the affected structure for selling	<ul style="list-style-type: none"> • The provision of a truck and labourers free of charge (for the relocation to and back from the relocation site). • Transitional support 10% of cost of moving the structure or at a rate determined by the MLHCP (twice).
		Occupant	Uses the affected structure for selling	<ul style="list-style-type: none"> • The provision of a truck and labourers free of charge (for the relocation to and back from the relocation site).

Affected Assets	Type of impact	Entitled units	Eligibility Criteria	Entitlement
Livelihoods	Loss of business income	Business owner (may be different from the owner of the structure where the business takes place)	Operator of the business that is registered with MCC and identified during the census survey	<ul style="list-style-type: none"> Transitional support to reflect the loss of income for the period of time when the business is not able to fully function prior to displacement (this has been calculated for each category of business). Livelihood restoration measures (non-monetary) such as the provision of improved equipment and training (an estimated cost for these has been calculated). Additional support ("additional compensation package") to the 366 affected traders who will not be relocated to the Campbell Street relocation site to enable them to self-relocate to other markets in the city.
		A vulnerable person	A person who has at least a single source of vulnerability	<ul style="list-style-type: none"> Additional support during RP implementation to support the PAP, which reflects their specific source of vulnerability.
		Business Worker	A Worker employed formally or informally who receives a daily wage by the business owner and was present at the census survey	<ul style="list-style-type: none"> Cash compensation to reflect the temporary loss of income incurred as a result of relocating the business, calculated as a transitional support based upon the expected period of time required to relocate (both ways).

NOTE: Helpers to the business are not entitled to any compensation on the basis that they are employed as domestic Helpers for the household, and do not receive a daily wage which is linked specifically to the business. Through the payment of transitional support to the business owner, there are not expected to be any adverse impacts on the Helpers. If a Helper has a concern that their income has been affected by the relocation process, they will be requested to raise a complaint using the GRM.

8. VALUATION OF AND COMPENSATION FOR LOSSES

This section describes the method used to conduct a valuation of fixed assets impacted using the principle of full replacement cost, and the compensation calculations for all losses.

The methodology to be used in valuing losses to determine their replacement cost is provided in Table 8-1. Local representatives of the MLHCP who were contacted were not aware of ESS5 and provided significantly reduced compensation figures under the assumption that the Project would benefit the PAPs. Thus, a certified valuer who is familiar with the principles of ESS5 and was able to provide a valuation that reflects the full replacement cost was assigned for the valuation of fixed private assets at Makeni Market. In terms of the asset's valuation, the consultant engaged certified valuers and quantity surveyors of the Ministry of Housing who utilized international standards for material cost and workmanship to determine the market value of each affected asset.

For this RP, the team used the daily income of each trader and multiplied by the potential disturbance period it will take each trader to settle in the relocation site (3 weeks) prior to normal business activities in the relocation site. The same is repeated (3 weeks allowance) as support back to the completed facility.

Table 8-1 Valuation methodology

Asset type	Factors considered in the valuation method
The mixed use residential and commercial structure	<ul style="list-style-type: none"> The market price of purchasing and transporting to the market location, the building materials in new condition. The cost of constructing the building, includes both the time taken and any additional materials required to fix the items together so that they are structurally safe. Transitional support of 10% of cash compensation for full replacement, or at a rate determined by the MLHCP. (See Section 11 below on how transitional support is determined).
Fixed shelves and tables	<ul style="list-style-type: none"> The market price of purchasing and transporting to the market location, the wooden shelves and tables in new condition, so that they are without rot/rust, and are in decent condition. The cost of fixing the shelves and tables which includes both the time taken and any additional materials required to fix the items together so that they are structurally safe. Transitional support of 10% of cash compensation for full replacement, or at a rate determined by the MLHCP.
Wooden doors	<ul style="list-style-type: none"> The market price of purchasing and transporting to the market location, the wooden doors in new condition, so that they are without rot/rust, and are in decent condition. The cost of fixing the wooden doors which includes both the time taken and any additional materials required to fix the items together so that they are structurally safe. Transitional support of 10% of cash compensation for full replacement, or at a rate determined by the MLHCP.
Cement walls with steel door	<ul style="list-style-type: none"> The market price of purchasing and transporting to the market location, the steel doors in new condition, so that they are without rot/rust, and are in decent condition.

Asset type	Factors considered in the valuation method
	<ul style="list-style-type: none"> • The cost of constructing the cement walls; includes both the time taken and the materials required. • Transitional support of 10% of cash compensation for full replacement, or at a rate determined by the MLHCP.

Using the outcome of the RP surveys, the approach for calculating compensation for the loss of fixed assets is presented in Appendix F. The total sum for the compensation⁷ of fixed assets is NLE 3,351,909 (USD 148,314.5).

The 366 traders who will self-relocate to other markets in the city – because they cannot be accommodated at the Campbell Street relocation site – requested additional support in addition to the transitional support that will be provided to them, to enable them to self-relocate to other markets. Thus, a lumpsum value of NLE 1,715 (USD 75) will be paid to each of them in addition to the transitional support they will receive.

⁷ It must be noted that the 3 privately owned plots MST 008, MST0040 and KST 0041 will be excluded from the project affected area to avoid land expropriation and since they are located outside the main market building; and therefore they were not valued..

9. COMMUNITY PARTICIPATION

This section of the RP describes the way in which the PAPs, their representatives, and other stakeholders, have been involved in its preparation. A summary of all stakeholder engagement activities conducted to date is provided in Table 9- 1 and detailed notes are provided in Appendix E.

Table 9- 1 Summary of stakeholder engagement activities

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
Local government	MCC Mayor, Chief Administrator, and key staff	September 18,2023	39 (27M/12 F)	Face to face/ Creole	<ul style="list-style-type: none"> The inclusion of petty traders without tables in data collection Waste handling procedures. Employment process and quota and potential involvement of youth in the project Market size and capacity to handle more than five hundred cars 	<ul style="list-style-type: none"> The survey team has ensured that all traders are identified and registered in the Census. The Project design includes a dedicated waste handling area. The project prioritizes employing Sierra Leoneans, particularly individuals from neighboring communities with the required skills. The provision of car parking spaces was taken into consideration in the development of the Project design.
Makeni Market Stakeholders, representatives	<ul style="list-style-type: none"> Market executives Market and Relocation site 	September 19, 2023	40 (29M/11F)	Face to face/ Creole	<ul style="list-style-type: none"> The relocation land and the project budget Seeking clarification on 	<ul style="list-style-type: none"> Constraints of the project were highlighted, citing limitations in both budget and land size. The

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COMMUNITY PARTICIPATION

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
	stakeholders – Elder men – Elder women – Buyers' representative – Market youth – Market Elderly People				whether the market planned for Kenema is the same as the one in Makeni <ul style="list-style-type: none"> The importance of including youths in employment opportunities, both in skilled and unskilled labor, as they contribute to the city's development Traders fear losing their space in the market space after construction to wealthier individuals, citing past experiences such as the lorry park issue Employment process and quota during project implementation. 	relocation site might not meet the anticipated size for the market structure and purchasing nearby houses was not feasible for physical expansion of the market <ul style="list-style-type: none"> Clarification on the concept of "upgrade" that involves demolishing the old structure and constructing a new, modern facility to improve the market facility, provide better trading space, and improve income and livelihoods. In general, a similar market design would be implemented in both markets. Local employment has been identified as a priority and as having a positive impact in the ESIA. The project will not solely rely on local workers; however, the PMU will ensure the contractor prioritize the recruitment of

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COMMUNITY PARTICIPATION

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
						<p>local unskilled and where the expertise exist, to hire skilled labor and will also utilize existing local supply chain to promote the local content policy</p> <ul style="list-style-type: none"> • A fair and transparent process will be used to allocate traders a space at the relocation site, and back at the upgraded market. A number has been assigned to each Trader in the existing market to be used for this purpose. • An employment quota (ideally 60%) has been proposed to actively involve youth and enhance the project inclusivity. Preference for employing Sierra Leoneans has been clearly stated, particularly individuals from neighboring communities with the necessary skills. Community members have already been hired for project development.

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COMMUNITY PARTICIPATION

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
Agencies and Departments representatives	<ul style="list-style-type: none"> – The Environment Protection Agency (EPA) – Sierra Leone Water Company (SALWACO) – EDSA – SLRA – SLRTC – Pharmacy Board – Traditional Healers – Religious Leaders representative – Youth Commission – Disaster Management Agency 	September 20, 2023	37 (26M/11F)	Face to face/ Creole	<ul style="list-style-type: none"> • The security status at the relocation site • Measures in place to ensure that traders will retain their selling spaces after the market upgrade • Current health and sanitation challenges in the market and the urgent need to incorporate a proper sanitation design through the technical team • The market space and its capacity to include all mentioned facilities in the proposed upgrade • Nature and extent of employment opportunities 	<ul style="list-style-type: none"> • The ELARD team leader and the Chief Administrator's representative explained the arrangements for the relocation site and how the collected data aims to address challenges related to relocation and reinstatement of traders in the new market. The project will respect the local content policy and ensure employment opportunities for local communities and youth.
Ministries Representatives	<ul style="list-style-type: none"> – Ministry of Trade and Industry – Ministry of Planning and Economic Development 	September 20, 2023	37 (24M/13 F)	Face to face/ Creole	<ul style="list-style-type: none"> • Inquiries were made about whether the relocation site is secured and can accommodate the present market population • Inquiries on measures to 	<ul style="list-style-type: none"> • Considering women and children in market operations was made, but could not be included into the Project design. • Traders will not lose selling

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COMMUNITY PARTICIPATION

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
	<ul style="list-style-type: none"> – Ministry of Local Government and Rural Development – Ministry of Agriculture and Food Security; – Ministry of Social Welfare, Gender and Children's Affairs; – Ministry of Water Resources; – Ministry of Tourism and Culture; – Ministry of Health and Sanitation – Ministry of Youths – Ministry of Labour and Social Security 				<p>prevent traders from losing their selling spaces post-construction</p> <ul style="list-style-type: none"> • Inquiries were made about the relocation timing and temporary structures • The importance of community engagement before relocation was highlighted • Inquiries were made about health and sanitation challenges in the current market. 	<p>space as they will be allocated a space at the relocation site, and at the upgraded market. Details of the schedule will be provided in the future.</p> <ul style="list-style-type: none"> • Clarification that arrangements for the relocation site are taking place with the assistance of Makeni City Council and stakeholders. • Clarification that the engineers would design the market plan based on the fixed available space, accommodating all mentioned facilities to the extent possible. • The Project design includes a dedicated waste management handling area as well as numerous improvements to wastewater management. • Focus Group Discussions will be made with the traders prior to

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COMMUNITY PARTICIPATION

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
						relocation to present the preliminary design and discuss the relocation issues.
Security Forces representatives	<ul style="list-style-type: none"> Police in Makeni City, Military in Makeni City, Fire force Office of National Security (ONS) Disaster Management Agency Family Support Unit (FSU) Prisons department Local Council Police Traditional Rulers 	September 21, 2023	37 (26M/11F)	Face to face/ Creole	<ul style="list-style-type: none"> The importance of adhering to safety guidelines to avoid issues faced by other structures in the past. Safety should be prioritized The need to involve the fire force in safety assessments for public buildings The importance of sensitizing the public about the project to facilitate its implementation and to make sure that everyone is aware about the relocation details in order to reduce conflicts and challenges 	<ul style="list-style-type: none"> The fire force will be contacted to ensure that building standards are met and making the maintenance process easier for the council. The Project design will comply with all applicable standards. The relocation site will be secured by the City Council at the new market to safeguard traders' goods to ensure their security. A fair and transparent process has been developed which can be used to relocate traders from their current position, to a selected relocation site, to avoid conflict occurring in the future.
Local government and property	Affected property owners and the MCC Mayor, Chief	September 22, 2023	36 (23M/13F)	Face to face/	<ul style="list-style-type: none"> Inquiries about the project start date and the timeline 	Provision of clear information about the expected start date

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COMMUNITY PARTICIPATION

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
owners	administrator and key staff			Creole	<p>for compensation</p> <ul style="list-style-type: none"> Inquiries about the alternative business location Inquiries on land space emphasizing that the provided space should anticipate future market expansion Inquiries about the potential space loss after construction and clarification on whether the new market would remain as free as the current market 	<p>of the upgrade works and the relocation site that are available.</p> <p>Stating that the market cannot be physically expanded beyond its current size, but the efficiency of land use can be significantly improved.</p>
Drivers and Riders Representatives	<ul style="list-style-type: none"> Motor drivers' union Bike rider's Kekeh Riders Omolankay Pushers 	September 22, 2023	32 (24M/8F)	Face to face/ Creole	<ul style="list-style-type: none"> Concerns about whether the relocation site could accommodate all traders Challenges faced due to market congestion Concerns on indicators and signs on the working site 	<ul style="list-style-type: none"> The relocation site is designed to accommodate all of the traders who have been registered. Satisfaction with the market upgrade project was expressed by the participants after the longstanding need for improved facilities in the

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COMMUNITY PARTICIPATION

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
						central market. <ul style="list-style-type: none"> Signboards and posts would be prominently displayed at the construction site.
Local government	– MCC	March 19, 2024	16 (12M 4F)	Face to face/ English	<p>The Makeni Chief Administrative Officer of MCC stated the following after a brief introduction:</p> <ul style="list-style-type: none"> It is very important that the project proceeds quickly and without delays. MCC is here to offer support. People are willing to transfer to the relocation site, but we must inform the customers that they are moved, provide the traders with a transitional support as they start to relocate so that they can continue feeding their households. Potential impacts to private land plots must be 	<p>All of these responses from the MCC are incorporated into the RP, where appropriate to do so. This includes, for example, the process used to move people to the relocation site, and then back again to the upgraded market.</p> <p>Steps were also taken to ensure that all of the traders have been successfully included in the census.</p>

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COMMUNITY PARTICIPATION

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
					<p>considered carefully.</p> <ul style="list-style-type: none"> • We are already half-way through the project and so the time to start with the construction works is now. Delays must not take place. • The selling space of the traders needs to be recorded, so we can compare before and after conditions. • The cut-off date is understood but the fact is that people change every now and then, and so new people may be present since the initial survey in September 2023. Some people have approached MCC indicating that they are not registered and so we have registered all of those that came with the help of the PMU. 	

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COMMUNITY PARTICIPATION

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
Traders	– Traders	28-29 June 2024	127 (14 M-113 F)	Focus group discussion/ Creole	<ul style="list-style-type: none"> • More individual shops should be added in the Project design to reflect the fact that some traders have existing shops (this is to be taken into consideration). • There is a need to provide toilets, water, storage facilities, and stalls at the temporary relocation areas (this is to be taken into consideration). • The need to raise awareness of the grievance mechanism (the PMU are responsible for the grievance mechanism and discussions were held as to how awareness could be improved). • All of the traders (100%) stated that they need practical support (trucks 	<ul style="list-style-type: none"> • The traders during this meeting agreed on the need to upgrade the market and also the proposed process to be used to relocate the businesses. • There was agreement that trucks and labourers will be required to assist the traders to relocate the business. • There was agreement associated with the classification of the businesses, which has been used to determine the amount of time to be made available to the traders to relocate. • Ongoing engagement with traders during the relocation process will reassure them that they will be allocated a space in the upgraded market. • Details of the grievance mechanism were provided based upon the realisation

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COMMUNITY PARTICIPATION

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
					<p>and labourers) to relocate their stalls and supplies. Some of the traders will need access to a storage area, tables, etc. so that they can continue their business activities.</p> <ul style="list-style-type: none"> • There was 100% agreement on the time period required for traders to relocate, based upon the classification of businesses which is copied below: <ul style="list-style-type: none"> ○ Microbusiness (1 person involved) = 2 weeks ○ Small business (2-4 people involved) = 3 weeks ○ Medium-sized business (over 5 people involved) = 1 month ○ Large-sized business (More than 10 people 	<p>that the majority of people present were not aware of how to raise a concern.</p> <ul style="list-style-type: none"> • It was made clear that all road sections used will be completely closed off to vehicle traffic and steps will be taken to prevent people trying to access with motorcycles. • The relocation site will be provided with security personnel to provide a safe and secure place for the businesses to operate.

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COMMUNITY PARTICIPATION

Stakeholder category	Stakeholder Designation	Date	Number and gender of Participants	Format & Language	Key issues/ concerns raised	Responses/ suggestions to the concerns raised
					<p>involved) = 2 months</p> <ul style="list-style-type: none"> Questions were raised about the safety of the relocation site that comprise sections of public road. . 	

An analysis of the feedback from the stakeholder engagement activities indicates the following, all of which are taken into consideration during preparation of the RP (refer to the text in brackets):

- The need to proceed as quickly as possible to avoid delays as the construction works need to commence as soon as possible (general comment);
- The need to provide a transitional support and transitional support to the PAPs to enable them to maintain their standard of living in their household (this is described in Section 11);
- The importance of identifying and assigning at the relocation site, a specific position for the traders to avoid competition for space and conflicts between them. The boundary between traders at the relocation site should also be marked on the ground, so that these are clearly marked (this is reflected in the process to be used to relocate traders in Section 10);
- The need for the relocation site to be ready to receive the traders, so that they can quickly re-start their business activities. It is essential that where traders have access to fixed roofs in the existing marketplace, they will be provided with a fixed roof at the relocation site, and later at the upgraded market. The same principle must be applied to those traders who rely on access to water, wastewater sanitation infrastructure, and electrical connections (a summary of the preparatory works required at the relocation site is presented in Section 10);
- Financial support should be provided for traders to maintain their standard of living whilst they relocate; and this financial support will be provided through the provision of transitional support to reflect the period of time when the businesses will not be fully functioning.
- In relation to livelihood restoration measures, these should include a micro-finance programme, and umbrellas for those traders who do not have a fixed roof cover.

Furthermore, given that the design of the relocation site in Campbell Street and Savage Street could accommodate 1,300 traders (i.e. less than the total number of traders currently active in the central market), the Traders' Union Executive and the Local Council Administration engaged with 308 out of the remaining 366 traders who cannot be accommodated at the relocation site due to the nature/ type of the goods they sell and the site arrangement. This engagement took place in January 2025 to explore potential relocation spots for them. These traders expressed their willingness to find spaces in other markets across the city throughout the construction period, and requested that the project should provide them with additional support apart from their transitional support. The list of these traders with their signatures/ fingerprints can be found in Appendix H.

During RP implementation (refer to Section 12), additional stakeholder engagements will be undertaken with the PAPs to provide them with the following information, in accordance with the Stakeholder Engagement Plan (SEP):

- Disclosure of the PAP's individual entitlements to compensation and additional support during the relocation process;
- Their allocated relocation site;
- The schedule for relocation;
- The persons within MCC/ PMU/ RP Implementation Agency who are responsible for managing the relocation process on a day-to-day basis;
- A reminder of the grievance redress mechanism so that they can raise a concern, should they wish to do so; and
- The need for ongoing M&E activities during RP implementation to track progress over time.

10. SITE SELECTION, SITE PREPARATION, AND RELOCATION

10.1 SITE SELECTION

The selection of the relocation site has been described briefly in Section 1.1.2. Limited space is available in Makeni, which is a typical urban setting where there are no substantial areas of land in the nearby vicinity of the market that can easily be converted into a temporary market for traders. There are several improvements that will be undertaken at the relocation site to ensure that it is suitable for the traders to continue their business activities, whilst the existing market is upgraded. It is possible that the upgrade works may take between 18-24 months, and so the relocation site must be adequate for use during this period.

During the RP surveys conducted in May-June 2024, details of the preferences expressed by traders associated with their favoured relocation site were collected and are illustrated in Figure 10-1. The majority of the traders (75.4%) prefer Campbell Street as the market relocation site and this will be the selected relocation site.

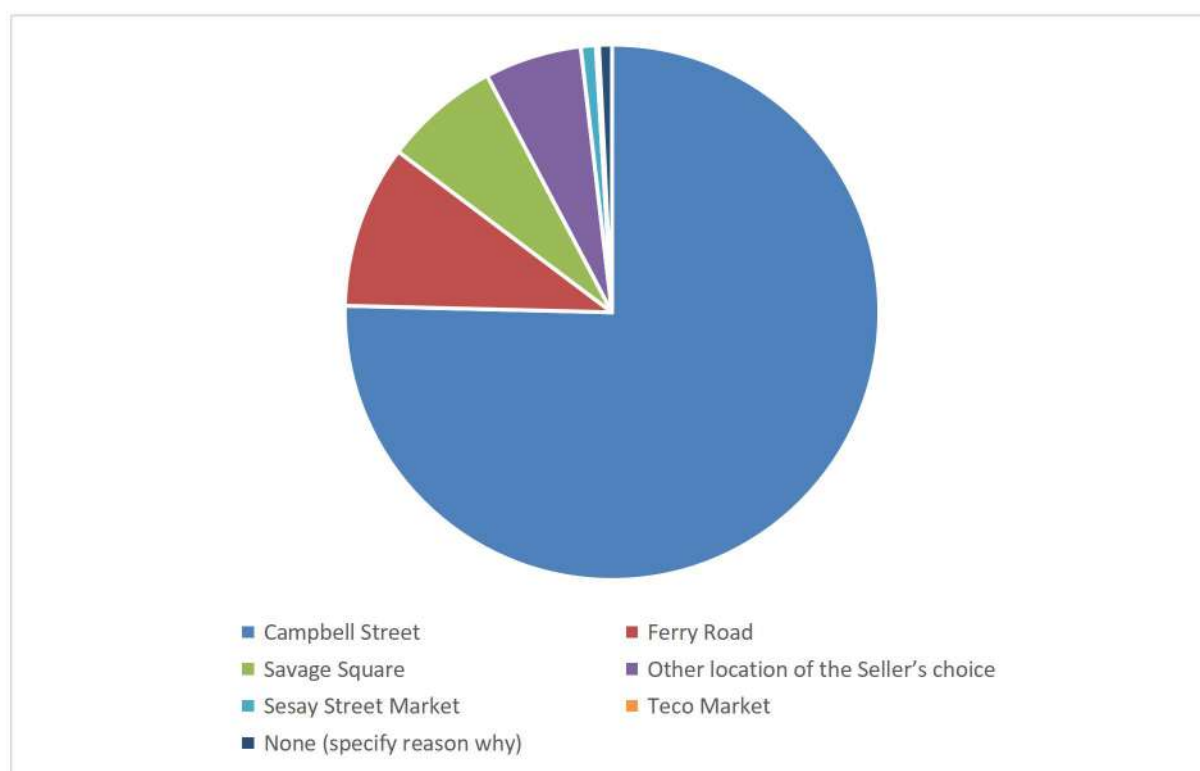


Figure 10-1 Trader preferences associated with the relocation site

10.2 IMPROVEMENT MEASURES AT THE RELOCATION SITE

In addition to the site's preparation and cleaning activities, other improvement measures are taken into consideration in the proposed design for the relocation site as described below (Relocation site design technical report).

The relocation site design includes twenty-six (26) market sheds, twenty (20) sets of mobile toilets, thirty-six (36) movable dust bins, and one solar-powered borehole. The layout is designed to maximize space utilization and create functional areas for both traders and buyers. The sheds will accommodate approximately 1,300 traders, with stalls arranged to allow for easy movement within each shed, ensuring a vibrant and efficient market environment that can handle a large flow of people. There are 366 traders who sell goods — such as cosmetics, salon products, electronics, etc. — that are difficult to accommodate at the relocation site due to their nature and the site's arrangement. Thus, these traders will find spaces at other markets across the city throughout the construction period. These traders will be provided with additional support (or an “additional compensation package”) in addition to the transitional support, to enable them to self-relocate to other markets in the city.

The facilities that will be included in the design are as follows:

- Market stalls

The stall layouts are similar to the specifications outlined in the main market feasibility document, with each unit measuring a maximum of 5x2 meters, providing an area of 10 square meters. Each 10-square-meter stall is divided into two 5-square-meter segments, shared by two traders. The circulation paths between stalls vary, with some stalls arranged in arrays and others positioned individually. The corridors range from minor paths at 1.0 meter wide to major passageways that are 2 meters wide. All stalls are designed using timber materials. There will be no stores at the relocation site due to space constraints.

- Toilet facility

The design incorporated mobile toilet facilities; and close to each mobile toilet facility, there will be a 200-liter capacity tank that will be mounted on a 1.5m high steel tower to aid the supply of water to the toilet facility. A total of twenty (20) mobile (portable) toilets will be installed in accessible areas along the Campbell Street and Savage Street; these will be located a few meters away from the market sheds along the street. Due to space constraints, there will be no specially designed toilets for the disabled persons.

- Water facility

To ensure a reliable water supply within the relocation site, a borehole with solar powered water pump has been strategically designed and positioned on-site. This borehole serves as the primary source of water, meeting the needs of both traders and visitors in the market.

- Waste management area

The design includes a dedicated area specifically allocated for the temporary storage and management of waste before it is collected and transported to the final disposal site. This designated waste management area is strategically located to minimize disruptions to the functioning of the market while ensuring efficient waste handling. A total of thirty-six (36) moveable trash bins have been proposed in this design to aid managing solid waste. The moveable trash bins will be placed between the available spaces provided between the sheds.

Table 10- 1 below shows the proposed design details of the relocation site.

Table 10-1 Proposed Relocation site design details

Site Name	Shed Quantity	Proposed construction material	Area (m2)	Approximate capacity for traders
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Site Name	Shed Quantity	Proposed construction material	Area (m2)	Approximate capacity for traders
Sheds for market stalls	26	Timber & Zinc	5,000	1,300
Mobile toilet facility with 200-litre water tanks and steel towers	20			
Moveable trash bins	36			
Borehole	1			

The relocation site preliminary design layout is shown in the figure below as provided by the FS and design consultant in their report (Drawing Makeni site Layout dated 30/09/2024, reference number RSK_XX_X002_41_5188.DOCX).

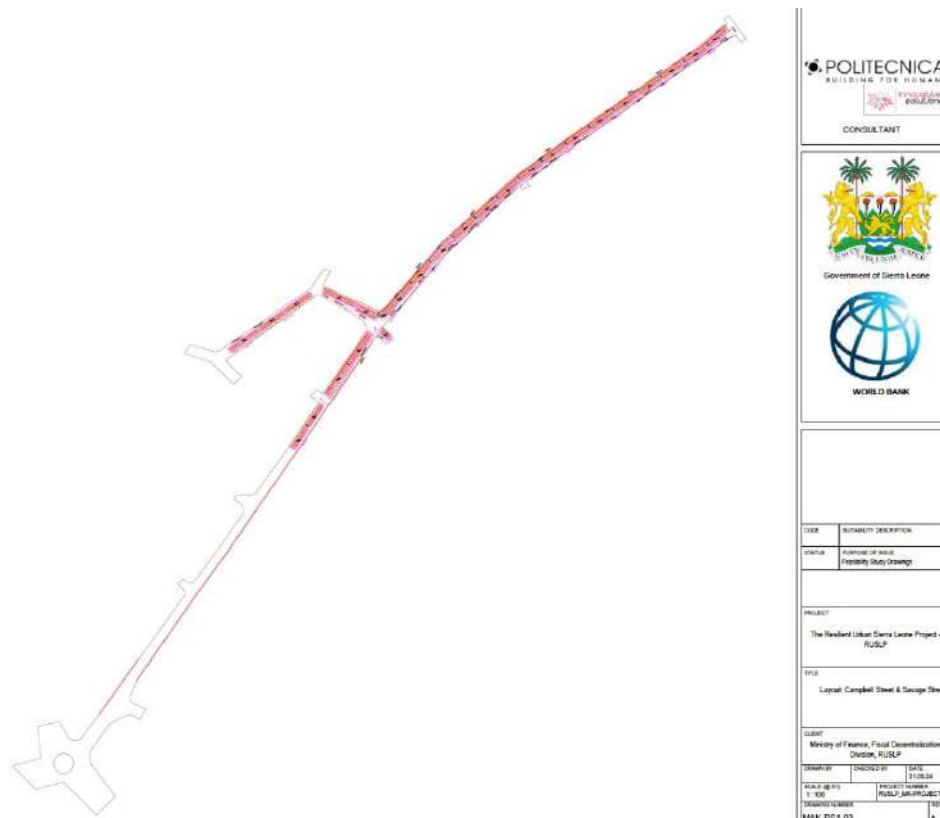


Figure 10-2 Proposed layout for Campbell street relocation site

Source: JV Politecnica & ISC, 2024

10.3 THE PROCESS USED TO RELOCATE TRADERS AND THEIR BUSINESSES

The process used to relocate traders has been extensively discussed with representatives from MCC, led by the MCC chief administrative officer, and with traders and their unions (Section 9). The process is described in this section using several steps and includes reference to a Compensation Agreement that reflects each Trader's and Worker's individual entitlements, as well as their required notice to vacate.

Step 1. The preparation of the relocation site and installation of facilities to provide adequate space for traders and their workers to relocate and continue their business activity whilst the existing market is upgraded.

Step 2. Engagement with the traders to disclose their individual entitlements and compensation and provide a Compensation Agreement. MCC with support from the RP committee and the RP implementation consultants will be responsible for allocating spaces and Traders' preferences will be applied. The team will ensure that traders who trade in identical/identical goods will be located within identified zones to the extent that it is possible to do so.

Step 3. The relocation of traders, their materials for sale and moveable equipment (such as wooden tables and umbrellas, etc.) to be moved to a pre-allocated position at their designated relocation site, whilst at the same time, metal fencing and posts are installed at the vacated area to prevent new traders occupying the space created. It is essential that the construction contractor at the existing market site is provided with a vacated site which is clear (unencumbered) as this could lead to delays in the start of civil works and claims for financial compensation. Note the following:

- All traders involved in the relocation process have been already registered with MCC;
- The position of the traders' current location has already been recorded during the RP survey using the existing market zones and GPS coordinates;
- Traders are to be relocated from their existing zones as a group at the relocation site, where they choose to do so, to help retain social networks. This is because some of the traders have strong friendship and other connections to each other at their current position, and also share childcare arrangements in some cases;
- Each trader and worker will be provided with a Compensation Agreement before their relocation, so that they can understand their entitlements for support, and agree to vacate at a specific date. Where the Trader or Worker is not literate, this will be read out to them by a representative from MCC. The Compensation Agreement will be signed⁸ by both the Trader/Worker and a representative from MCC. The traders/workers will be reminded of the grievance mechanism during this process, as this is when typically grievances are raised during a resettlement implementation process;
- The trader's position at the relocation site will be marked-up on the ground using wooden pegs and spray paint (or other type of marker that will remain visible) using a unique reference number, so that traders and their workers can be directed to their exact location by MCC representatives. This aims to avoid a 'free for all' situation where traders compete for the best sites and compete for selling space, as this could result in conflict;

⁸ A thumbprint may be used instead of a signature by non-literate traders.

- The selling space (recorded in square metres) will be used to ensure that they are provided with the same selling space at the relocation site, as a minimum.
 - As for the 366 traders who cannot be relocated to the designated relocation site due to space constraint (the relocation site can only accommodate 1,300 traders) and the nature of goods they trade, they will be assisted to find a site at another market in the city during the market rehabilitation period, and they will be provided with additional support or compensation on top of the transitional support to enable them to self-relocate.
 - Traders will be offered practical support to relocate their businesses in the form of a truck and labourers, free of charge. This may include help to move wooden tables, umbrellas, products for sale, equipment, and other materials;
 - The category of the Trader's business (microbusiness: 1 person involved; small business: 2-4 people involved; medium sized business: 5-9 people involved; large sized business: over 10 people involved) will be used to calculate:
 - i. The vacation date and time needed for the Trader to relocate; and
 - ii. The payment of a transitional support which aims to provide income whilst the business is relocating; and
 - Traders are to be provided with livelihood restoration measures which aim to assist them in restoring/improving their business activities, which will be provided as they relocate to their designated position at the relocation site. This may include, for example, the provision of new umbrellas (where they are currently using them), new wooden tables, training on bookkeeping and financial literacy, debt management, and other non-monetary types of support (refer to section 11 for details).
- Step 4. As the construction fencing is installed at the existing market, signs will be installed to warn people not to attempt to enter the cleared area. Security personnel will be present to prevent people moving into the space. The signs will include details of the grievance mechanism that can be used to raise a concern about the clearing process, or behaviour of the security guards.
- Step 5. The relocation site will allow the traders and workers to continue their business activities whilst the civil works at the existing market are completed. Ongoing monitoring of the relocation process will be undertaken using a range of pre-defined key performance indicators (KPIs).
- Step 6. Once the civil works at the existing market are completed and the market is ready to receive the traders, the traders/workers will gradually be relocated back to a pre-allocated position using the applicable actions described in Steps 2-3). Note that it may not be possible to relocate the traders to their original position, if the design of the market substantially changes. A verification survey of traders and workers will be undertaken prior to the start of the relocation process, to check if their condition has changed since the RP survey was completed. The verification survey will check their identification and socio-economic conditions of their business.

The period of time in the vacation notice has been defined by considering the size of the business and was discussed with the MCC. The vacation notices are as follows:

- Microbusinesses = 2 weeks
- Small sized businesses = 3 weeks
- Medium sized businesses = 4 weeks
- Large-sized businesses = 8 weeks

It is worth noting that in the Makeni central market upgrade site, no medium or large-sized businesses were identified during the RP census.

10.4 THE COMPENSATION AGREEMENT

A Compensation Agreement will be drafted individually for each Trader and Worker that contains a summary of their entitlements, at the early point of RP implementation and before they are requested to relocate. Given the challenges associated with literacy, the document will contain the minimum information needed. The Compensation Agreement will include the following:

- The name of the Trader/Worker;
- The market zone of the business;
- The category of the business (microbusiness, small sized business, medium sized business, large sized business);
- Category(ies) of product sold by the Trader (butcher, clothes/shoes, etc.);
- Details of fixed assets under private ownership that are eligible for compensation and the compensation amount and payment method;
- The ability to salvage fixed assets under the ownership of the business owner even if these are to be compensated;
- Details of the access to infrastructure that the business currently has (fixed roof, water, wastewater sanitation, electricity);
- Details of the allocated relocation site, position and access to infrastructure that the business currently has (fixed roof, water, wastewater sanitation, electricity);
- Vacation date and details of practical support to relocate the business (truck and labourers, provided free of charge);
- The calculation method to calculate compensation and the transitional support (including the additional support for the 366 traders who will have to self-relocate, that was fixed at NLE 1,715 per trader) and the method of payment (mobile banking to the extent possible and not cash in hand);
- A summary of the following which concerns relocating the business once again, this time back to the upgraded market site:
 - A commitment to provide 'like-for-like' access to infrastructure that the business currently has (fixed roof, water, wastewater sanitation, electricity);
 - Details of any rent and any other charges at the upgraded market site;
 - The payment of a transitional support and practical support during the process to relocate back to the upgrade market; and
 - A minimum period of time the business is required to relocate after the date has been set for the relocation process by MCC.

11. LIVELIHOOD RESTORATION AND TRANSITIONAL SUPPORT

11.1 LIVELIHOOD RESTORATION MEASURES

Preferences associated with livelihood restoration measures were discussed provisionally (no promises were made) with traders during focus group discussions following the RP survey. As stated above, it was made clear that their preferences were part of the survey scope to help design the measures, and not a clear commitment to provide such measures to them in the future. The timeline required to organise the LR measures will be 1 month. The time required to implement them ranges from 1 to 3 months. M&E indicators will be used during (and after) implementation to check their effectiveness.

The outcome of these focus group discussions is presented below:

- Many of the traders requested support to develop their business in the future, such as through the provision of a micro-finance programme, where traders can access financial capital to expand their activities;
- The traders sought assistance with bookkeeping and financial literacy skills which was often lacking and is linked to their relatively low (55.5%) literacy status; and
- Traders requested specific items of equipment such as umbrellas that are in good condition (many of the Trader's umbrellas were old), and basic items such as improved seats to assist them in their selling activities.

11.2 THE PROVISION OF TRANSITIONAL SUPPORT

Transitional support is to be provided through: (1) the payment to a Trader, which was calculated using the average daily wage for each category of business (microbusinesses and small-sized businesses⁹), and then multiplying this by the amount of time they are to be provided with support to relocate; and (2) the provision of practical support (labourers and a truck) free of charge to help the business physically relocate. Item (1) reflects the fact that whilst physical relocation of the business could take place quickly, it will still take some time for the business to become established at its new location, attract the same level of customers, and continue their business activity at a level which reflects their pre-displacement status.

The transitional support for the traders was calculated in a way that reflects their current level of income, whilst ensuring that even traders on relatively low levels of daily income, still receive a reasonable amount of allowance that meets at least minimum wage legislation. The Minimum Wage Act 1997 requires a minimum wage effective from April 2023 (2023, Finance Act) of 800 NLE/month (\cong 35 USD) for the formal sector, which is 40 NLE/ day (\cong 1.75 USD/day). On this basis, all traders who stated that their daily income range was below this level, will receive the minimum wage. The traders who stated their income ranged between NLE 51-100 will receive the mid-point figure which is NLE 75. The transitional support for the traders in 'NLE 101 and above' was calculated based on their weekly income to be able to come up with a fair amount that reflects this category of traders and based upon the dataset, four different values were used to calculate their daily income: NLE 120, 180, 250 and 320. If any Trader believes that the level of transitional support is too low, then they will be able to request a re-assessment of the figure through the grievance mechanism and produce any supporting documentation, such as financial business records, etc. This value

⁹ In Makeni central market upgrade site, no medium or large-sized businesses were identified during the RP census.

also reflects the fact that whilst the businesses will not be fully operational during the relocation process, they are not also likely to experience the same level of business cost from purchasing supplies, and therefore the above is considered to be a reasonable approach.

The transitional support calculations for each of the two business sizes present at Makeni are presented in Table 11-1 and Table 11-2. The average time needed to relocate from the market to the relocation site is estimated to be 14 days (microbusinesses) and 21 days (small-sized businesses)¹⁰ and this was subsequently verified through engagement with traders and their representatives during the focus group discussions. For the purpose of calculating the transitional support figures for the entire project, the figures need to be doubled since the PAPs will have to relocate on two separate occasions.

Table 11-1 Calculation of Transitional Support for Microbusiness traders to relocate and return to the market site

Daily income	Time required ¹¹	Transitional Support NLE/trader	Transitional Support USD/trader	Number of traders	Total Transitional Support (NLE)	Total Transitional Support (USD)
40	28	1,120	49.8	706	790,720	35,158.8
75	28	2,100	93.3	504	1,058,400	47,023.2
120	28	3,360	149.3	285	957,600	42,550.5
180	28	5,040	224.0	66	332,640	14,784.0
250	28	7,000	311.1	27	189,000	8,399.7
320	28	8,960	398.2	31	277,760	12,344.2
Total					3,606,120	160,260.4

Table 11-2 Calculation of Transitional Support for Small sized Business traders to relocate and return to the market site

Daily income	Time required ¹²	Transitional Support (NLE)/trader	Transitional Support USD/trader	Number of traders	Total Transitional Support (NLE)	Total Transitional Support (USD)
40	42	1,680	74.7	8	13,440	597.6
75	42	3,150	140.0	8	25,200	1,120.0
120	42	5,040	224.0	13	65,520	2,912.0
180	42	7,560	336.0	3	22,680	1,008.0

¹⁰ As mentioned above, in Makeni central market upgrade site, no medium or large-sized businesses were identified during the RP census

¹¹ These businesses are highly mobile, have no fixed assets under private ownership, and will be able to relocate quickly to their designated relocation site. 28 days is the time needed to move to the relocation site and then back to the market (14x2)

¹² These businesses have limited fixed assets (most have none) and will be able to relocate quickly with practical support (truck and labourers). 42 days is the time needed to move to the relocation site and then back to the market (21x2)

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

LIVELIHOOD RESTORATION AND TRANSITIONAL SUPPORT

250	42	10,500	466.7	2	21,000	933.4
320	42	13,440	597.3	1	13,440	597.3
Total					161,280	7,168.3

The amount to be provided to the workers as transitional support, is the minimum wage (NLE 40) which is also the same as the calculated average daily wage which is 40 NLE.

Table 11-3 Workers Compensation calculation to relocate and return to the market site

Daily income	Time required ¹³	Transitional Support (NLE)/ Worker	Transitional Support USD/ Worker	Number of Workers	Total Transitional Support (NLE)	Total Transitional Support (USD)
40	28	1,120	49.8	42	47,040	2,091.6
40	42	1,680	74.6	2	3,360	149.2
Total					50,400	2,240.8

The 366 traders who will self-relocate to other markets in the city – because they cannot be accommodated at the Campbell Street relocation site – requested additional support in addition to the transitional support that will be provided to them, to enable them to self-relocate to other markets. Thus, a lumpsum value of NLE 1,715 (USD 75) will be paid to each of them in addition to the transitional support they will receive.

11.3 THE PROVISION OF ADDITIONAL SUPPORT TO VULNERABLE PAPs

Using the outcome of the socio-economic surveys, a summary of the type of additional support that is to be provided to the PAPs based upon their source of vulnerability is provided in Table 11-4.

Table 11-4 Additional support to vulnerable people

Source of vulnerability	Vulnerability amongst traders	Vulnerability amongst Workers	Total	Type of support to be provided
Head of the household is illiterate	340	NA	340	Details of the Compensation Agreement and GRM to be verbally read out by a MCC representative
Households of youths (under the age of 24) or children (under the age of 18) who have lost both parents (they are orphans)	104	NA	104	In-person support to guide them through the RP implementation process to reduce anxiety and
Households where a disabled child is present, or a disabled parent is present,	82	NA	82	

¹³ Workers will be able to relocate quickly as they have no fixed assets to move, however they need to wait for the business trader to set up his/her business.

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

LIVELIHOOD RESTORATION AND TRANSITIONAL SUPPORT

Source of vulnerability	Vulnerability amongst traders	Vulnerability amongst Workers	Total	Type of support to be provided
or where a household member is (or has recently been) ill or is in need of care				ensure they receive their compensation on time, as PAPs with these sources of vulnerability are particularly susceptible to a sudden drop in their income.
Households with more than five children	760	0	760	
Child-headed household under the age of 24	49	NA	49	
Single-parent household	275	7	279	
Elderly people (people aged 65 years or older)	149	NA	149	
People who are discriminated against in society due to their albinism, HIV, history of contracting Ebola, or other reason	1	0	1	Additional monitoring to check their general status and level of wellbeing, so that additional support can be provided to them, where this is necessary to do so. The CLOs will be tasked with monitoring the wellbeing of vulnerable people.
Adult with poor health (this may be a person who is unable to work due to limited physical mobility, mental health condition, or other reason, or a person who is need to care where there is additional expense in the household)	55	1	56	
Adult with mental disability	16	0	16	
Adult with physical disability	118	1	120	Practical support to address their physical disability where this is practical to do so, such as the provision of tri-walkers, rollators, and other equipment.

Practical support includes measures that are designed to reflect the specific vulnerabilities of the traders, and will be designed on a case-by-case basis. Any costs associated with such support measures is not expected to be major and shall be covered by the contingency applied to the RP budget (Section 13).

12. IMPLEMENTATION SCHEDULE AND CHANGE MANAGEMENT

12.1 SCHEDULE

A Resettlement Committee with representatives from all relevant stakeholders will assist with RP implementation in addition to the RP implementation agency that will be recruited for the purpose. Within the committee, sub-committees may be formed to focus on various aspects of resettlement such as relocation site and space allocation, capacity building, income restoration and grievance redress. Proper implementation hinges on a detailed RP budget that carefully estimates all costs associated with the RP exercise. The PMU will be supervising and overseeing the development and implementation of the RP.

The RP schedule will be coordinated with the construction schedule. Before any civil works activity commencement, PAPs will have to be compensated in accordance with national laws and World Bank resettlement laws, regulations and guidelines. In other words, no Trader should be displaced due to civil works activity before compensation is paid and relocation site with adequate facilities are prepared and provided.

The schedule is expected to ensure that all PAPs, prior to their physical relocation will:

- have been adequately consulted about the project, its impacts and compensation entitlements;
- have received compensation entitlements in a timely manner;
- have been provided with means to establishing livelihoods.

Table 12-1 lists components of the implementation schedule. It is assumed that project preparation including completion of design and procuring the services of a contractor will be completed within the next six months. It is projected construction will last around 2 years.

Table 12-1 RP implementation Schedule

Activity	Months														
	M1	M2	M3	M4	M5	M6	M7	M8	M9	M10	M11	M12	M13	M14	M15
Disclosure of the Draft RP and preparation of a Final RP															
Establishment of the RP Implementation Committee, capacity building, and first meeting															
A pre-entry assessment at each location site to check that the temporary position of the market will not result in secondary economic displacement															
Preparation of the relocation site and installation of facilities															
GRM awareness sessions															
GRM Operational															
Engagement with the traders to disclose individual entitlements and compensation, and to sign a Compensation Agreement															

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

IMPLEMENTATION SCHEDULE AND CHANGE MANAGEMENT

Activity	Months														
	M1	M2	M3	M4	M5	M6	M7	M8	M9	M10	M11	M12	M13	M14	M15
Compensation payment to the PAPs															
The relocation of traders, their materials for sale and moveable equipment															
Provision of livelihood restoration measures and additional support to vulnerable PAPs															
Monitoring and evaluation activities															

NOTE: Once the civil works at the existing market are completed and the market is ready to receive the traders, the traders/workers will gradually be relocated back to a pre-allocated position using a similar schedule to that above. An updated schedule that reflects the actual progress on the ground shall be prepared. It is expected that the time required to rehabilitate the market is no more than 24 months.

12.2 CHANGE MANAGEMENT PROCEDURE

A Change Management Plan shall be part of the construction contractor's Environmental and Social Management System (ESMS). The ESMS will include a formal procedure that aims to screen changes in the Project so that any resettlement-related risks and impacts that are linked to this change are identified, assessed, and responded to. This may include, for example, the preparation of an addendum to the RP or other actions, as necessary. The Change Management Plan will be managed by the RP implementation Agency.

Irrespective of the magnitude of change, all resettlement-related activities associated with the Project will be undertaken in accordance with the principles and other commitments included in the RP so that there is consistency in the approach taken to the PAPs and other stakeholders.

The process used to evaluate change in the Change Management Plan will comprise the following:

Step 1 – Review the need and implications of the potential change

- Assess the need for the change to ensure that it is fully justified, and that opportunities to avoid/minimise adverse impacts to PAPs have already been taken to the extent possible;
- Identify any legal or other requirements linked to the potential change, using the legal framework (section 5) of the RP;
- Conduct an analysis of the potential implications of the change which could include, for example, the identification of additional PAPs and need for further compensation payments, an increase in the time to be provided for PAPs to relocate, or changes in the design of the Project during construction that could impact the ability of the (relocated) traders to move back into the upgraded market site;
- Determine what stakeholder engagement activities are required to discuss and communicate the change and its potential implications; and
- Prepare a summary report, or a RP Addendum (if required), to provide a summary of the change and include details of any budgetary and time implications.

Step 2 – Disclose the findings of Step 1 and communicate the change to stakeholders

- Using the summary report or RP Addendum, communicate the change to stakeholders whilst ensuring that all engagements are recorded in writing, so that evidence is available to reflect how the change was discussed;
- Take into consideration the views and opinions of stakeholders so that the process used to implement the change is optimised; and
- Update the summary report or RP Addendum as needed, including details of how the potential change has been communicated, and how stakeholder feedback has been used to improve the implementation of the change.

Step 3 – Implement the change and monitor environmental and social outcomes

- Implement the change in accordance with the summary report or RP Addendum using the (existing or additional) monitoring and evaluation(M&E) indicators so that the outcome of the change is recorded over time, and improvement measures are taken to improve the process applied, where necessary; and
- Depending upon the outcome of M&E actions, it may be necessary to adjust the way in which the change is implemented, and take corrective actions to ensure that all changes are implemented in accordance with the principles and process already described in the RP.

12.3 THE MANAGEMENT OF RISKS DURING RP IMPLEMENTATION

The purpose of this section is to describe the potential key risks and mitigation measures that are going to be applied, during RP implementation (Table 12- 1).

Table 1-1 Potential key risks and mitigation measures

Description of the risk	Description of the consequence to the project	Mitigation
<p>The level of transitional support is not accepted by the traders as it is perceived to be too low.</p>	<ul style="list-style-type: none"> • Grievances which take time to resolve, leading to delays to the implementation schedule. • Legal claims for higher compensation. • Reputational damage. • Protests and refusal to relocate. 	<ul style="list-style-type: none"> • Detailed explanation to the traders as to how their transitional support has been calculated, and what their entitlements are based upon the eligibility and entitlement matrix. • Ensuring that the displaced persons understand the additional support measures which are to be provided, including livelihood restoration measures. • Raising awareness of the grievance mechanism so that concerns can be raised at an early stage.
<p>Not all the displaced persons understand the resettlement process due to language differences, literacy, and other reasons.</p>	<ul style="list-style-type: none"> • A deterioration in displaced person's physical and mental health. • Reputational damage. • Protests and refusal to relocate. 	<ul style="list-style-type: none"> • Ensuring that the RP Implementation Agency have adequate liaison officers who are able to spend time with traders and

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

IMPLEMENTATION SCHEDULE AND CHANGE MANAGEMENT

Description of the risk	Description of the consequence to the project	Mitigation
		<p>discuss the process of relocating with them, whilst listening to their concerns.</p> <ul style="list-style-type: none"> Using trusted individuals to read out verbally the content of the Compensation Agreement.
Government representatives responsible for RP implementation have a poor understanding of ESS5 requirements, and instead focus on implementing the process in accordance with national legislation (only).	<ul style="list-style-type: none"> Reputational damage. 	<ul style="list-style-type: none"> Provision of initial training at the start of the RP implementation process. Ongoing 'on the job' capacity building activities to those involved.
The entry of new traders after the cut-off date has been established.	<ul style="list-style-type: none"> Claims for compensation. Protests and refusal to relocate. 	<ul style="list-style-type: none"> Providing newly arrived traders with a clear description of the purpose of the cut-off date, directing them towards the signs, and indicating that the registration period for inclusion into the RP database has closed as RP implementation will start shortly.
Conflicts between traders who are seeking the 'best' spots at	<ul style="list-style-type: none"> A risk of violence. 	<ul style="list-style-type: none"> The pre-allocation of

Description of the risk	Description of the consequence to the project	Mitigation
the relocation site.	<ul style="list-style-type: none"> • A deterioration in displaced person's physical and mental health. • Reputational damage. • Protests and refusal to relocate. 	all traders using a transparent process so that all parties involved are aware of the process being used to allocate traders at the relocation site, and the upgraded market when complete.

13. COSTS AND BUDGET

The purpose of this section is to present the costs and budget associated with RP Implementation. As the transitional support to traders and workers is to be paid twice as they relocate to/from the temporary relocation site and the market, it is essential that the RP reflects the provision of two payments. It is important that the payment of the transitional support after the market is upgraded, is not eroded by ongoing price inflation, which is why a suitable contingency of 15% has been added into the budget.

According to Reliefweb¹⁴, the national headline inflation reduced from previous levels to 42% in March 2024 from 43% in February 2024, and food inflation reduced to 42% in March 2024. Due to this high level of inflation, the costs stated in this section must be linked to the future inflation level, so that erosion of purchasing power from the national currency does not take place. The estimated RP budget is **23,073,416 NLE (1,015,635 USD)** as shown in Table 13-1. The detailed RP budget can be found in Appendix F.

Table 13-1 RP Budget Summary

Item Description	Total Price (NLE) ¹⁵	Total Price (USD)
Compensation for the loss of immovable assets ¹⁶ and practical support to relocate	3,351,909	148,315
The provision of practical support (trucks and labourers) to relocate privately owned assets that are moveable.	135,588	6,000
Rental fees at a rate determined by the MLHCP for the mixed use residential and commercial structure owner for the period of time that the building is not suitable for living due to the market works (estimated at 2 years).	16,000	709
Transitional support for Micro-Businesses (while relocating to relocation site and then back to the upgraded market, 28 days, that is 14 days each way)	3,606,120	160,260
Transitional support for Small Scale-Businesses (while relocating to relocation site and then back to the upgraded market, 42 days, that is 21 days each way)	161,280	7,169
Additional support to the 366 traders who will not be relocated to the relocation site in Campbell Street in order to self-relocate to other markets in the city	627,690	27,450

¹⁴ ReliefWeb. World Food Programme Sierra Leone Market Prices Bulletin. Q1 2024. Available at: <https://reliefweb.int/report/sierra-leone/wfp-ram-sierra-leone-market-prices-bulletin-quarter-1-2024#:~:text=The%20national%20headline%20inflation%20came,42.10%20percent%20in%20M arch%202024.>

¹⁵ All monetary values stated in NLE (New Leones) in the RP have been converted into USD using a conversion value from www.xe.com dated 05 August 2024.

¹⁶ Excluding the price of land as per PMU's instructions, since the Project will not cover the price of land.

RP REPORT FOR MAKENI CENTRAL MARKET UPGRADE

COSTS AND BUDGET

Item Description	Total Price (NLE) ¹⁵	Total Price (USD)
Transitional support for workers (while relocating to relocation site and then back to the upgraded market)	50,400	2,241
Livelihood Restoration programmes	655,342	29,000
Preparation and construction of the relocation site	12,768,060	560,017
RP implementation agency costs (Committee establishment, agency fees)	1,175,096	52,000
Support to vulnerable people	341,355	15,000
Total	22,888,840	1,012,781
Contingency (15%)	3,433,326	151,917
Grand Total	26,322,166	1,164,697

14. GRIEVANCE REDRESS MECHANISM

A Grievance Redress Mechanism (GRM) has been available during preparation of the RP, and this will continue to be available and publicly disclosed during RP implementation. The GRM is described in detail within the RUSLP SEP-Grievance Redress Mechanism documented (April 2021) which describes the process to be used to receive and resolve a grievance across the following 8 steps:

- Step 1: Submission of grievances
- Step 2: Recording of grievance and providing the initial response
- Step 3: Investigating the grievance
- Step 4: Communication of the Response
- Step 5: Complainant response
- Step 6: Grievance closure
- Step 7: Appeals process
- Step 8: Analysis of trends in complaints/grievances.

14.1.1 Steps in project-specific grievance handling processes and required timeframe

GRM stages and description	Timeline
Assign Focal Persons (FP) The Social Safeguards Specialist together with the Gender Specialist at the PMU level will liaise with stakeholders establish grievance committees at the district and community levels.	Prior to project implementation
Training on the design and operation of the GRM (Committee members)	Before Project Implementation
Receive, acknowledge receipt and transfer and register complaints. The GRM will have several tiers from the community level, District level, PMU levels. Public disclosure to create awareness of the GRM.	1 working day after receiving complaint
Complaints and grievance register	1 working day after receiving complaint
Screen and refer Complaints. Once complaints are received, the Social safeguards specialist and the Gender Specialist will undertake preliminary assessment of the eligibility of complaints, categorize the grievance. Assign priority (high, medium, and low severity and acknowledge receipts of complaints to complainant. The complaint will also be referred for investigation. It will be tracked the resolution process to ensure timely feedback.	2 working days after receiving complaints
Assessment/ investigation of the complaint. GRC will undertake further assessment	Ongoing: 2 weeks
Formulate an initial response. Once the assessment/ investigation is completed, the social safeguards Specialist will receive the report and formulate a response and communicate to the complainant. The communication should state whether the grievance has been accepted or rejected, providing reasons for the decision, and indicate next steps.	2 working days
Select a resolution approach. GRM Committee will investigate and resolve complaints and where applicable to a specialized body.	Ongoing; 3 working days after receiving complaints
Settle the issues (or further escalate the issues)	Ongoing; 5 working days after registering complaint
Monitor and evaluate grievance redress process	Ongoing
Feedback to complainant and other interested parties	Ongoing
Public disclosure to raise awareness of the GRM on where to submit	On going

complaints and the resolution process.	
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As of the end of July 2024, no grievances associated with the project had been received. Awareness of the GRM was raised at each stakeholder engagement meeting, and also during the RP survey.

A grievance can be registered directly at the project activity site, MCC, or the RUSLP PMU c/o the Fiscal Decentralization Division of the Ministry of Finance through the Grievance Uptake Points (GUP) incorporated into the GRM System which were varied in number and type so that everyone, literate or illiterate, rich or poor, young or old will have access to the System in any of the following modes and, if necessary, anonymously or through third parties by:.

1. Telephone (toll free line) which is: 876 (with associated Whatsapp numbers 090 711836/090711837)
2. Mobile phone (WhatsApp, text or voice or picture for additional evidence):
 - o +232 90 711 836 (Male)
 - o +232 90 711 837 (Female)
3. Online GRM Platform accessible @ ruslp.org
4. Letter to the PMU and the respective GRCs where the address is: ruslpgrms@gmail.com
5. Form available at the council where the GRC Focal person or designate is a desk officer to record complaints
6. Complaint form to be lodged at the location of the market.

The above channels allow anonymous grievances to be received.

Once a grievance has been received it shall be processed according to the Grievances Resolution Procedure outlined in Section 6.0 of the GRM April 2021 document. The PMU has established a database that will be used to track grievances. Additionally, the RUSLP PMU, through the Gender and GBV Specialist, will implement additional measures to handle sensitive and confidential complaints, including those related to sexual exploitation and abuse/sexual harassment. The RP Implementation Committee and local authority structures will assist in coordinating and facilitating grievances received.

1. Two Grievance Redress Committees (GRCs) have already been established: PMU-level GRC - where the grievance is lodged directly to the PMU, the Social Safeguards Specialist will establish, train, and monitor a project-specific GRCs. Representatives of key stakeholders of the project will form the GRC at the project level. The Social Safeguards Specialist and the Gender and Gender-Based Violence Specialist located in the PMU are responsible for receiving, processing, and referring complaints, and following up on their resolution.
2. Community or site-level GRC - when the grievance or complaint is lodged at the community/site level, membership of the community/site-level GRCs will be constituted by selected traditional local authorities, religious leaders, members/employees of the local government structures, service providers, Sierra Leone Police/Family Support Units (FSU), CBOs, NGOs, and others, as required.

GRM awareness raising sessions as part of RP implementation plan will be conducted.

The PMU has already recruited a specialized NGO to handle GBV/SH issues. As part of the responsibilities of the NGO, it has developed a GBV Action Plan for the project and had designed a GM for GBV/SH which has been merged with the project electronic GM platform.

GBV/SH grievances are lodged, analyzed and the relevant support and feedback provided through this section which can only be accessed by officials of the NGO.

World Bank Group (WBG) Grievance Redress Service

Communities and individuals who believe they are adversely affected by a WB-supported project may submit complaints to existing project-level grievance mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints are promptly reviewed to address project-related concerns. Project-affected communities and individuals may submit their complaints to the WB's independent Inspection Panel, which determines whether harm occurred or could occur due to WB's non-compliance with its policies and procedures. Complaints may be submitted anytime after concerns have been brought directly to the World Bank's attention and Bank Management has been allowed to respond. For information on submitting complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

15. MONITORING AND EVALUATION

15.1 OBJECTIVES

The PMU will undertake M&E activities with the objective of overseeing implementation of the RP so that any corrective actions needed can be identified and acted on in the shortest time possible. The independent RP implementation agency will monitor the RP and design corrective actions, preparing quarterly reports for submission to the PMU and other stakeholders using pre-defined Key Performance Indicators (KPIs) (refer to Table 15-1).

15.2 INTERNAL MONITORING AND INDICATORS TO BE USED

The independent RP implementation agency will undertake a monthly evaluation of the RP implementation process and gather information from KPIs for internal discussion and review. This shall take the form of a monthly workshop led by the independent RP implementation agency. The agenda of the monthly internal workshop will include the following:

- Introduction and objectives of the workshop;
- Review of RP KPIs;
- Review of the grievance register;
- Review of recent stakeholder engagements records;
- Review of the RP Corrective Action Register which shall be used to track progress of the corrective actions identified;
- Review and discussion of the current RP implementation process and assessment of where/when additional resources are required.

The independent RP implementation agency will submit quarterly reports (or as agreed) to the PMU. The report will at least cover status of compensation disbursement and RP implementation, nature of complaints, redress actions and follow-up actions.

An annual monitoring report will be developed internally and include:

- A general assessment of the compliance of the implementation of resettlement activities with objectives and methods as set out in this RP;
- An assessment of the compliance of the implementation of resettlement activities with laws, regulations and safeguard policies as stated above;
- An assessment of resettlement and compensation procedures as they have been implemented;
- An evaluation of the impact of the resettlement and compensation programs on incomes and standard of living, with focus on the “no worse-off if not better-off” requirement;
- The identification of actions to take as part of the on-going monitoring to improve the positive impacts of the program and mitigate its possible negative impacts, if any.

Table 15-1 Internal monitoring and evaluation indicators

Indicator	Information Source	Frequency
<i>Monitoring the status of the relocation site</i>		
The completion of readiness visits by the PMU at a relocation site to check progress being made to ensure that they are in a suitable condition to receive traders.	PMU inspection records	Monthly
<i>Monitoring the total number of PAPs and their businesses</i>		
<ul style="list-style-type: none"> Number of impacted traders Number of impacted workers Number of owners of private residential structures Number of impacted owners of non-residential structures that are immovable (such as fixed tables, etc.) Number of businesses impacted by category: <ul style="list-style-type: none"> Microbusinesses Small sized businesses Medium sized businesses Large sized businesses 	RP records held by the PMU	Monthly
<i>Monitoring the financial spend and resources dedicated to RP implementation</i>		
<ul style="list-style-type: none"> Overall spending by each RP budget category 	Financial records held by the PMU	Monthly
<ul style="list-style-type: none"> Number of privately owned structures that have been demolished. 	RP records	Monthly
Distribution of spending by: <ul style="list-style-type: none"> Cash compensation payments for transitional support and transitional support (including the additional support for the 366 traders who have to self-relocate) Construction of like-for-like structures Livelihood restoration measures (training, provision of new selling equipment, etc.) Specific assistance measures to vulnerable persons General implementation activities and administration 	Financial records held by the PMU	Monthly
<ul style="list-style-type: none"> Number of staff dedicated to implementation of the RP 	Financial records held by the PMU	Monthly
<i>Monitoring stakeholder engagement activities</i>		
Number of stakeholder engagements undertaken with: <ul style="list-style-type: none"> PAPs (owners/users) of residential structures traders Workers Women-only groups of traders PAPs who have been identified as vulnerable 	Stakeholder engagement records	Monthly
<i>Monitoring the process of traders relocating to their designated relocation site, and as they relocate back to the upgraded market</i>		
Number of traders who have signed the Compensation Agreement and have agreed to vacate at the appointed date	RP records	Monthly
Number of traders who have vacated their original position in the market	RP records	Monthly
Number of traders who have relocated to their appointed site and those who have self-relocated	RP records	Monthly
Number of traders who have been provided with access to electricity, who are eligible for this utility.	RP records	Monthly
Number of traders who have been provided with access to water, who are eligible for this utility.	RP records	Monthly
Number of traders who have been provided with access to wastewater and sanitation infrastructure, who are eligible for this utility.	RP records	Monthly
Number of traders who have been provided with a fixed roof cover, who are eligible for this type of cover.	RP records	Monthly
<i>Monitoring the provision of the transitional support, compensation, and livelihood restoration measures</i>		

Indicator	Information Source	Frequency
Number of traders who have been paid their transitional support	RP records	Monthly
Number of traders who have been paid their additional support on top of the transitional support in order to self-relocate, out of 366	RP records	Monthly
Number of in-kind replacement residential structures provided, as a percentage of the planned total	RP records	Monthly
Number of in-kind replacement business structures provided, as a percentage of the planned total	RP records	Monthly
Number of PAPs being provided with livelihood restoration measures, as a percentage of the planned total	RP records	Monthly
Number of vulnerable persons being provided with specific assistance measures, broken down by gender	RP records	Monthly
Number of traders being provided with transitional support measures as a percentage of the total	RP records	Monthly
<i>Monitoring the effectiveness of the GRM</i>		
Number of grievances that have been received (in total)	Grievance record	Monthly
Number of grievances that have been registered	Grievance record	Monthly
Number of grievances that have been rejected	Grievance record	Monthly
Number of grievances that have been raised anonymously	Grievance record	Monthly
Number of grievances that have been acknowledged within the target time frame.	Grievance record	Monthly
Number of grievances that have been investigated and a proposed resolution submitted to the complainant within the target time frame	Grievance record	Monthly
Number of grievances closed-out	Grievance record	Monthly
Number of grievances still open		Monthly
Number of grievances that are being processed through mediation	Grievance record	Monthly
Number of grievances that are being processed in a court of law or administrative procedure.	Grievance record	Monthly
Number of PAPs who have experienced restoration and/or improvement in their economic activities and standard of living	Socio-economic survey	Every 6 months

15.3 EXTERNAL MONITORING AND EVALUATION

The supervision of safeguards implementation for the Project will be done by the FDD of the MoF as part of the overall project implementation in conjunction with the Social and Environmental Safeguards Specialists at the PMU, and relevant experts involved in environmental and social mitigation. World Bank supervision teams will also include environmental and social safeguards experts.

The RP committee will be carrying out the external monitoring and evaluation and the following will be evaluated:

- If compensation payments have been completed in a satisfactory manner (as per the RP);
- If there are improvements in livelihoods and well-being of PAPs; and
- If grievances or conflicts emanating from the RUSLP have been successfully resolved.

Several indicators will be used to measure these impacts. These include, among others,

1. A comparison of income levels of PAPs before-and-after the RP was implemented;
2. A comparison of income levels of PAPs benefitting from the RUSLP;

3. The scope of livelihoods and employment assistance offered under the RUSLP and other accessible alternative incomes;
4. Changes in standards of living/housing conditions of PAPs after Makeni market upgrade;
5. The number of grievances and their status, time and quality of resolution;
6. The number of vulnerable people/groups identified and assisted, and impact of resettlement assistance provided to them;
7. The number of demolitions of structures, after giving notice to the owner/user; and
8. The number of PAPs compensated in a given period in comparison with what was planned.

15.4 DATA ANALYSIS AND REPORTING

Monitoring and evaluation data will be analysed by the PMU as they oversee implementation of the RP using MS Excel or other tools, so that trends in the indicators used can be tracked over time. The following reports will be issued by the RP implementation agency during RP implementation:

- Quarterly RP progress reports;
- Socio-economic survey report;
- Stakeholders' consultation meetings reports; and
- An annual monitoring and evaluation report.

APPENDICES

APPENDIX A- RP TOR

APPENDIX B-COLLECTED RP SURVEY DATA

This appendix is attached to the report as it consists of csv files

APPENDIX C- RP WORK PLAN

APPENDIX D- RP SURVEY QUESTIONNAIRE

APPENDIX E- STAKEHOLDER ENGAGEMENT ACTIVITIES

APPENDIX F- RP BUDGET

This appendix is attached to the report as it consists of an Excel file.

APPENDIX G- TOR FOR THE RP IMPLEMENTATION AGENCY

APPENDIX H- LIST OF TRADERS WHO CANNOT BE ACCOMMODATED AT THE MAKENI RELOCATION SITE AND WHO WILL HAVE TO SELF-RELOCATE TO OTHER MARKETS, WITH THEIR SIGNATURES/ FINGERPRINTS