ENVIRONMENT AND SOCIAL MANAGEMENT FRAMEWORK

LESOTHO RENEWABLE ENERGY AND ENERGY ACCESS PROJECT

Drafted by Lesotho Electricity Company
October 2019
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<td>Bureau of Statistics</td>
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<td>BP</td>
<td>Bank Procedure (World Bank)</td>
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<td>CERC</td>
<td>Contingent Emergency Response Component</td>
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<td>CO2</td>
<td>Carbon Dioxide</td>
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<td>Department of Energy</td>
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<td>GoL</td>
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<tr>
<td>HIV/AIDS</td>
<td>Human Immunodeficiency Virus/Acquired Immunodeficiency Syndrome</td>
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<tr>
<td>HT</td>
<td>High Tension</td>
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<tr>
<td>IAP</td>
<td>Interested and Affected Party</td>
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<tr>
<td>kW</td>
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<td>Kilo Watt</td>
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<td>LDS</td>
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<tr>
<td>LEC</td>
<td>Lesotho Electricity Company (Pty) Ltd</td>
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<td>LEWA</td>
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<tr>
<td>LV</td>
<td>Low Voltage</td>
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<tr>
<td>M</td>
<td>Maloti</td>
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<tr>
<td>M &amp; E</td>
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<td>MV</td>
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<tr>
<td>MVA</td>
<td>Mega Volt Amp</td>
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<td>Project Implementation Unit</td>
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<td>RAP</td>
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<td>WASCO</td>
<td>Water and Sewage Company</td>
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EXECUTIVE SUMMARY

Description of the Lesotho Renewable Energy and Energy Access Project (LREEAP)

The Government of Lesotho is preparing a project, the Lesotho Renewable Energy and Energy Access Project (LREEAP) funded by the World bank, to scale up renewable energy-based off-grid electrification and increase access to electricity in rural and peri-urban areas of Lesotho. The Project Development Objective is to increase access to electricity in rural and peri-urban areas of Lesotho. The project will be implemented over seven years under the Ministry of Energy and Meteorology (MEM). The project will support a comprehensive suite of investments for the expansion of access to electricity in peri-urban and rural areas by (a) extending the main grid to industrial, commercial and residential customers in peri-urban areas, as well as (b) promoting the use of off-grid solutions in rural areas to maximize the number of households provided with electricity services while enabling basic public services, fostering local economic development, and supporting pragmatic business models to attract private investment. A substantial technical assistance (TA) component is proposed to support a widespread consumer education campaign to inform and engage with citizens, and to launch a multi-pronged capacity-building program to address sector needs.

The MEM's Department of Energy (DoE) will implement Components 2B, 3 and 4; LEC will implement Components 1 and 2A.

Overview of Project Components

Component 1: Grid extension to Peri-Urban Areas of Lesotho

This component, to be implemented by LEC, will finance the design, procurement of materials and construction works required to electrify select industrial and commercial loads in peri-urban areas of Lesotho, as well as provide connections to residential customers nearby. This component will create roughly 6 new connections economic development zones (with the potential of providing electricity to 252 companies) along with approximately 1400 residential customers nearby.

Component 2: Rural Electrification by Mini-grids
• Sub-component 2A: Rehabilitation and Upgrading of LEC Mini-Grid at Semonkong
• Sub-component 2B: Mini-grid Deployment Under PPP Models

This component will support the electrification of areas where electricity supply through mini-grids represents the least-cost option from a country perspective, as underpinned by the Electrification Master Plan and geospatial analysis.

Component 3: Technical Assistance

Given that the market is very nascent, the technical assistance component will play a critical role in upstream and downstream capacity building. More specifically the fund will be used to finance activities including but not limited to the following:

• Subcomponent 3A: Project implementation and coordination support
• Subcomponent 3B: Women’s Employment, Consumer Education and Citizen Engagement and Productive Uses of Energy

Component 4: Contingent Emergency Response Component (CERC)

A Contingency Emergency Response Component (CERC) with zero allocation may be used to partially cover emergency response via implementation of key activities by the appropriate agencies to respond to the emergency. The CERC could also be used to channel additional funds should they become available as a result of an eligible emergency. For the Lesotho Energy sector, emergency conditions may arise subsequent to droughts, flooding or energy import shortage.

Safeguards Assessment of the LREEAP

The following Safeguards Policies were identified as being triggered by the LREEAP:

Environmental Assessment OP/BP 4.01
Natural Habitats OP/BP 4.04
Physical Cultural Resources OP/BP 4.11
Physical Cultural Resources OP/BP4.11

Involuntary Resettlement OP/BP 4.12

Safety of Dams OP/BP 4.37

Projects on International Waterways OP/BP 7.50

**Summary of Key Safeguard Issues**

Overall, the Project will have many positive effects, which should be sustained over the long term. In general, it will help fight poverty and boost shared prosperity, as well as encourage investment in knowledge and skills in all sub-sectors of education. Promising investments will be made in regional infrastructure and economic integration, with a focus on initiatives to produce highly qualified human resources for priority growth sectors. More specifically, the project will promote awareness among all national stakeholders about the environmental and social issues of Project activities and respect for the environment and the essential principles of sustainable development. Overall, the negative or harmful environmental impacts that are likely to be generated by the Project will be limited in time and space.

No adverse indirect or long term environmental or social impacts are anticipated from project investments, while these are expected to provide positive effects on project beneficiaries and may reduce pollution from fuel-wood used for cooking and candles used for lighting.

Environmental impacts for grid extensions are related to works at substations and the erection of power lines, which for instance may require safe disposal of construction materials, old batteries and other waste. These substations are small, and impacts are expected to be limited. Off-grid investments could include systems based on solar, hybrid solar-diesel generators, and small-scale hydropower.

Involuntary Resettlement (OP 4.12) safeguard policy is triggered. Adverse impacts, however, are expected to be minor and outweighed by the Project’s positive impacts. The type of subprojects financed under the Project generally have small footprints, normally follow existing right-of-way and have some flexibility in terms
of specific location to avoid land acquisition. However, some land acquisition or loss of assets such as trees and arable land are anticipated.

The Framework Approach

The geographical scope of the Project is countrywide, and it is expected that project implementation will eventually include all the 10 districts covering the lowlands, foothills and highlands zones of Lesotho. Urban, peri-urban and rural areas will be included. As the specific infrastructure and location of the grid extension and off grid electrification subprojects as well as specific technical assistance are not identified at this stage, a framework approach has been adopted to assess the potential environmental and social impacts and risks of the LREEAP. Specific investments will be identified during project implementation and from a safeguards perspective the Project is operating within a framework approach. This framework approach includes an Environmental and Social Management Framework (ESMF) and a Resettlement Policy Framework (RPF). The ESMF provides guidelines for screening all subprojects and all project activities, determination of requirements for assessment, and preparation of further documentation in accordance with the World Bank safeguards policies including site-specific environmental and social safeguard instruments.
CHAPTER 1 PROJECT DESCRIPTION

1.1. PROJECT CONTEXT

Electricity demand continue to increase as the source of energy and facilitates technological advance and in turn stimulates the economy by providing gains in productivity. This is reflected by the steady increase in consumption of electricity in sectors that are perceived to be the economic drivers namely mining, construction and textile. It is therefore imperative for the Ministry of Energy and Meteorology (MEM) and Meteorology (MEM) to ensure reliable and efficient supply of electricity. Electricity reliability measures the consistency of services on demand as provided by the utility to the customer.

While electricity access is low in Lesotho, the country has potential to achieve universal access by 2030 using clean, renewable energy resources. Nationwide, about 38% of households have access to electricity, comprising 60% for urban and peri-urban households and 18% for rural households. Almost all those with access to electricity are grid connected. A larger part of the country is largely mountainous with low population densities making access to the grid very difficult. A number of these rural communities are involved in subsistence farming with no value addition due to lack of modern technologies which could be run by electricity. Basic social services like health and education are also disadvantaged due to lack of electricity.

Electricity demand in Lesotho totals 155MW; however, more than half of the demand is supplied from imports of electricity. Lesotho’s main source of power generation is the 72MW Muela hydropower plant managed by LHDA. This provides for 40 percent of the demand and the rest is supplied using imports from ESKOM (South Africa) and EDM (Mozambique) – based mostly on coal-based power generation. In 2016 to 2017, of the 862 GWh of electricity purchased, LEC imported 373 GWh of electricity from South Africa (Eskom) and Mozambique (EDM) at prices which range from M0.77 to M1.50 per kWh, substantially higher than purchases from Muela hydropower plant at M0.13 per kWh. As such, electricity imports amounted to 86 percent of LEC’s supply costs. According to LEC’s projections, peak power demand is expected to grow to 204 MW by 2020 and 432 MW by 2030.

Lesotho is fortunate to have an abundance of renewable energy (RE) resources such as solar, wind, and hydropower, which has the potential to surpass its relatively modest energy needs. Wind potential exceeds
1000W/m² in certain pockets of the country, and global horizontal irradiation exceeds 5.3kWh/m² in most parts of the country. The Scaling-Up Renewable Energy in Low Income Countries (SREP) Investment Plan for Lesotho, prepared with the support of the World Bank and other donors, presents the total technical capacity of renewable resources as 2300MW, with annual energy generation potential of 5900GWh. Lesotho’s Energy Policy 2015 – 2025 recognizes that these resources can be transformational energy sources, especially in remote, hard-to-reach areas of the country like the highlands located in the east and central parts of the country mainly in the districts of Thaba- Tseka, Mokhotlong, Qacha’s Nek and Quthing.

Realizing the potential of these RE resources is a focus of the Government’s Vision 2020 Strategy and the draft National Strategic Development Plan (NSDP) II 2019 to 2023, viewed it to be a potential catalyst for job creation and growth in private sector investment. The NSDP calls for increased clean energy production to attain self-sufficiency and export potential; expanded electricity access; and better, more efficient use of domestic energy resources. Investment in RE is viewed as a means for addressing many of the energy sector challenges faced by Lesotho, as it would contribute to reduce Lesotho’s dependence on electricity imports, alleviate fuel imports and the use of wood fuel, as well as provide decentralized electricity for rural development and leverage private sector investment. Therefore, the GoL has set a target to increase the use of RE resources by 200MW by 2020. Despite its low market penetration, demonstrated cost effectiveness of decentralized RE technologies powered by solar photovoltaic (PV), wind, or micro-hydro could bring access to modern energy services to the Basotho who currently rely on biomass and kerosene to meet their energy needs.

For improved coordination of electrification efforts, the GoL is preparing an electrification master plan (EMP) that articulates the role of grid electrification and off-grid electrification in meeting the national access targets. The Electrification master plan, financed by the European Commission (EC), under its capacity building program with the DoE will guide sector planning. While Lesotho has had the most successful experience with centralized grid extension, the masterplan defines the areas that should be connected to the grid and those that should require decentralized services. The final draft of the electrification master plan has been delivered to GoL in June 2018 and presented to the Lesotho Energy Sector Coordination Forum on July 11, 2018. The EMP provides a recommendation on how best to use GoL’s annual public budget dedicated to electrification, currently amounting M 150 million (approx. US$ 11.1 million), using an 80/20 allocation for grid expansion and off-grid electrification respectively.
The Grid component of the study identified areas for electrification within 5km and 7.5km radius (depending on the location) to the nearest grid and having a potential of 70 or more households. The EMP estimates an average of M 15,000 (approx. US$ 1,112) per grid connection which translates into 7,756 grid connections annually, hence 155,000 new grid connections until 2038. The Off-Grid component identified areas greater than 5km (highlands and river areas) and 7.5km (lowlands and foothills) from the existing grid and planned grid extensions. Solar PV was identified as the most suitable option for off-grid electrification, proposing 6 off-grid options based on the affordability levels ranging from solar lanterns, solar kits, solar home systems to mini-grids. Estimates for the Off-grid component show that 10,346 off-grid connections will be made annually and 207,280 new off-grid connections up to 2038.

1.2. PROJECT OBJECTIVES AND BENEFICIARIES

The Government of Lesotho is preparing a project, the Lesotho Renewable Energy and Energy Access Project (LREEAP), to scale up renewable energy-based off-grid electrification and increase access to electricity in rural and peri-urban areas of Lesotho. The Project Development Objective is to increase access to electricity in rural and peri-urban areas of Lesotho.

This project will support a comprehensive suite of investments for the expansion of access to electricity in peri-urban and rural areas by (a) extending the main grid to industrial, commercial and residential customers in peri-urban areas, as well as (b) promoting the use of off-grid solutions in rural areas to maximize the number of households provided with electricity services while enabling basic public services, fostering local economic development, and supporting pragmatic business models to attract private investment. A substantial technical assistance (TA) component is proposed to support a widespread consumer education campaign to inform and engage with citizens, and to launch a multi-pronged capacity-building program to address sector needs.

The proposed Project creates conditions for more effective delivery of public services in peri-urban and rural
areas and contributes to an enabling environment for private-sector participation in energy service delivery. There are approximately 665 schools, 64 health facilities, 14 agricultural resource centers, 6,450 small businesses, 940 churches and 188 other public buildings that lack electricity service. These community facilities can be anchor loads to enhance the commercial viability of rural electrification. A key feature of the Lesotho Energy Policy to scale up the deployment of off-grid solutions is to attract private sector participation to the off-grid market. To pilot this initiative, the Project will explore the possibility of private mini-grid developers and operators providing service to these anchor loads. There is an opportunity to create mechanisms to incentivize the private sector to deliver services in a sustainable manner, dovetail with anchor loads such as community facilities to reach remote households, and to ensure affordability for consumers and adequacy of revenue for service providers. It is estimated that 202 schools, 31 health facilities, 12 agricultural resource centers, 4165 households and 490 small businesses will be connected to mini-grids through the Project. The project will also provide on-grid electrification to about 252 industrial/agro based consumers and about 1400 potential residential customers that will be located within the vicinity of electrified economic zones.

1.3. PROJECT COMPONENTS

The Project will involve four components as follows:

1.3.1. Component 1: Grid extension to Peri-Urban Areas of Lesotho

This component, to be implemented by LEC, will finance the design, procurement of materials and construction works required to electrify select industrial and commercial loads in peri-urban areas of Lesotho, as well as provide connections to residential customers nearby (see figure 1 below). This component will create roughly 6 new connections economic development zones (with the potential of providing electricity to 252 companies) along with approximately 1400 residential customers nearby.

The component will contribute towards construction of MV and LV distribution lines (33kV/11kV) as well as the upgrading of existing or construction of new substations. Grid connections to the selected areas will cater to agriculture productive use such as in Butha-Buthe, industrial loads such as in Mokhotlong and Berea, and electrification in the highlands such as Qacha’s Nek, which all have high potential for economic development. Additionally, this component will support the preparation of technical studies and consultancies as well as
project management expenses such as the financing of external audit, oversight of implementation of the environmental and safeguards instruments for the investments, as well as the oversight of the health and safety aspects during construction.

The model envisioned is particularly viable for LEC, as the electrical corridors built under the project to connect large and viable new customers will be also utilized by the utility to develop its low voltage network to underserved residential customers, accelerating the achievement of LEC’s and GoL’s electricity access expansion targets. Site identification will be conducted in consultation with LNDC (and will be aligned with LNDC’s Strategic Plan 2018-2022), DoE and LEC based on the potential for job creation and maximizing socio-economic development in the peri-urban and industrial parts of Lesotho. The final selection of the sites will be confirmed and validated by the geospatial electrification analysis based on a least cost approach.

This component will fund the connection of residential customers living within 600m of existing and proposed distribution transformers in each zone, which according to LEC will range in cost from US$300 to US$1000 per connection. The number of connections realized will depend on the sites finally selected for development by DoE in collaboration with LEC and LNDC.

Figure 1: Target Areas for Grid Extension (highlighted in blue)
1.3.2. **Component 2: Electrification by Mini-Grids**

This component will support the electrification of areas where electricity supply through mini-grids represents the least-cost option from a country perspective, as underpinned by the Electricity Master Plan (EMP) and geospatial analysis.

**Sub-component 2A: Rehabilitation and Upgrading of LEC Mini-Grid at Semonkong**

This component will fund the rehabilitation and upgrading of Semonkong, a hydro-based mini-grid with diesel as an alternative electricity supply source. Semonkong, located 113km from the heart of Maseru, is operated by LEC. However, due to technical challenges and low hydrology, the hydro turbine is currently inoperable and installed capacity (180 kW of hydro and 500kW of diesel) at the site does not meet the demand\(^1\) of its service area. Therefore, rehabilitation of the turbine, expansion of generating capacity by adding 1.5 MW of solar PV and 500kWh of storage, and the upgrading of the operational mechanisms for the simultaneous production of electricity by multiple supply sources is required and will be funded by the project. In addition, the expansion of the distribution network and connections to approximately 100 additional customers, both residential and commercial, as well as appropriate metering solutions for new and existing customers will also be funded through the project.

Feasibility and engineering design studies as well as implementation support for LEC (for oversight of implementation of the environmental and safeguards instruments for the investments as well as the oversight of the health and safety aspects during construction) will be supported under this sub-component.

The proposed sub-project is located at Semonkong in Maseru district about 120km South East of Maseru city, 29°49′39.30″S 28°02′22.83″E, see **Figure 2 and 3** below.

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\(^1\) Current demand totals 500kW but doesn’t include suppressed demand and self-generation.
Figure 2: Map showing proposed Project area, Semonkong

Figure 3: Current location of Semonkong hydro station.
1.3.3 Sub-component 2B: Mini-grid Deployment under PPP Models

This subcomponent will support the electrification of areas where electricity supply through mini-grids represents the least-cost option from a country perspective, as underpinned by geospatial analysis. This component will fund the deployment of several mini-grids using private sector-led business models and help create state-of-the art projects using mini-grids that will i) test various PPP business models for service delivery, iii) improve availability of mini-grid market information thereby attracting private sector participants, iv) offer technical support for due diligence and project implementation, and v) create customer awareness about different tiers of service offered by mini-grids.

Up to 38 mini-grid sites will be selected in agreement with the Department of Energy based on the high priority areas proposed by GoL (who identified 30 potential mini-grid sites) and geospatial analysis (which has identified 55 potential sites for development). Care will be taken to select sites with significant potential for economic development and job growth in diverse areas of the country, including the highlands. The mini-grids will service all households and community (education, health, agricultural resource) facilities in the specified service area. Commercial customers and other anchor loads will be encouraged to connect as well. Based on preliminary analysis, it is expected that roughly 4800 customers will be connected to mini-grids developed within this sub-component.

The technical focus will be on solar hybrid systems, i.e., solar generation with battery storage, and diesel back-up; mini-hydro may also be considered on a case by case basis given Lesotho’s extensive hydro potential throughout the country. The mini grids will be built to standards specified by LEWA (LEWA’s rural service standards or to Lesotho’s grid code standard in order to allow for integration to main grid in the future).

The component will be implemented under a market-based approach whereby the private sector develops mini grids to deliver electricity services on a build-own-operate basis, with financial support offered through a single funding window: minimum subsidy tender. DoE will be responsible for providing payments to developers toward capital expenditures (CAPEX) through a clear and transparent process. For areas that private developers consider too risky, DoE is considering fully public financed approaches, with private sector participation in constructing and operating of the mini grid. This could be incorporated as a separate tender.
under this sub-component depending on uptake of the minimum subsidy tender and private sector interest to enter these areas. The assessment of this approach will be completed during the first year of the project.

Selected companies will obtain community and district-level agreement. DoE will manage land acquisition of sites before tender. LEWA will grant mini-grid operators licenses or license exemptions once construction is complete and technical standards verified. Selected companies will operate the mini-grids, providing O&M and retail services to its customers.

This component will be complemented by extensive TA to (a) confirm the sites through further feasibility studies and techno-economic analysis; (b) promote productive and efficient use of energy by users; (c) provide technical, legal, and procurement support to effectively design the bidding documents and supervise the construction of the mini-grid assets; and (d) increase capacity of local mini-grid developers.

1.3.3. Component 3: Technical Assistance

Given that the market is very nascent, the technical assistance component will play a critical role in upstream and downstream capacity building. More specifically the fund will be used to finance activities including but not limited to the following:

Subcomponent 3A: Project implementation and coordination support.

This support will include:

a. Selection and hiring of an Independent Verification Agent (IVA) tasked with ensuring companies meet their obligations to customers of both mini-grids and grid extension

b. Hiring of a dedicated M&E Officer, who will be responsible for monitoring and evaluation during project implementation

c. Managing certification program for all companies, excluding LEC, funded by project

d. Establishment and funding of PIU within REU

e. Support for the development and endorsement of a suitable regulatory framework for off-grid electrification (under preparation by other donors), including product standards and fiscal exemptions for clean energy products

f. Establishment of a geospatial planning platform for planning and tracking progress of national electrification programs

g. Hiring of a part-time gender expert to drive the actions under the project, especially on women's
employment, consumer education and productive uses of energy

h. Capacity building for the DoE and LEC (DoE and LEC) on mitigating and managing social risks related to the labor influx (sexual exploitation, gender-based violence (GBV), human trafficking, teenage pregnancies)

Subcomponent 3B: Women’s Employment, Consumer Education and Citizen Engagement and Productive Uses of Energy

The subcomponent will fund the following:

- Firstly, the sub-component will fund the technical assistance work focused on enhancing women’s employment in the energy sector;
- Secondly, the subcomponent will address gaps in entrepreneurship in the mini-grid sector through the completion of an assessment of the barriers and the preparation of an action plan to address these issues under Component 2B that will be led by DoE;
- Thirdly, the subcomponent will also fund the development and execution of a community awareness campaign, developed to inform people in target areas of the benefits and costs of electricity services, as well as the payment mechanisms, procedures and safety practices of the electrification process.

1.3.4. Component 4: Contingent Emergency Response Component (CERC)

A Contingency Emergency Response Component (CERC) with zero allocation may be used to partially cover emergency response via implementation of key activities by the appropriate agencies to respond to the emergency. The CERC could also be used to channel additional funds should they become available as a result of an eligible emergency. For the Lesotho Energy sector, emergency conditions may arise subsequent to droughts, flooding or energy import shortage.

1.4 Activities Excluded from LREEAP

The following lists the activities that cannot be supported under the LREEAP

1. Any activity within the protected area/UNESCO declared heritage site;
2. Any activity located within forested areas or plantations;
3. Any activity involving procurement of pesticides or fertilizers and/or with the potential to lead to increased use of pesticides or fertilizers.

4. Protected area or critical natural habitat is excluded; and

5. Transformers and capacitor banks based on PCBs

6. Sub-projects that trigger OP/BP 4.37 Safety of Dams will not be eligible for funding under this project.

7. Sub-projects trigger OP/BP 7.50 International Waterways and there is significant potential for economic development and job growth at the site, project re-structuring may ensue.

8. Any Environmental Assessment (EA) Category A sub projects
CHAPTER 2: PURPOSE AND SCOPE OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

The geographical scope of the Project is countrywide, and it is expected that project implementation will eventually include all the 10 districts covering the lowlands, foothills and highlands zones of Lesotho. Urban, peri-urban and rural areas will be included. As the specific infrastructure and location of the grid extension and off grid electrification subprojects as well as specific technical assistance are not identified at this stage, a framework approach has been adopted to assess the potential environmental and social impacts and risks of the LREEAP. Specific investments will be identified during project implementation and from a safeguards perspective the Project is operating within a framework approach. This framework approach includes an Environmental and Social Management Framework (ESMF) and a Resettlement Policy Framework (RPF). The ESMF provides guidelines for screening all subprojects and all project activities, determination of requirements for assessment, and preparation of further documentation in accordance with the World Bank safeguards policies including site-specific environmental and social safeguard instruments.

The project is classified as Category B on the expected impacts according to the World Bank B OP4.01. Given the specific sites and locations of project interventions have not yet been identified, the project is required to prepare an Environmental and Social Management Framework (ESMF) which would seek to mainstream all environmental and social concerns into the preparation, design and implementation of the project. The ESMF has been prepared in line with international good practice and the World Bank’s environmental operational policies (“safeguards policies”) and it takes into consideration Lesotho national environmental legislation, as far as applicable. The ESMF must be prepared, approved and disclosed publicly in Lesotho and at the World Bank external website prior to project appraisal.

Under the Project, the two implementing agencies – Lesotho Electricity Company (LEC) and the Department of Energy (DoE), through their respective Project Implementing Units (DoE and LEC) – are responsible for identification and screening of subprojects and their adequate environmental and social performance. More particularly, the DoE and LEC carry out environmental/social screening and will assess the requirements for subsequent environmental and social management instruments (e.g. RAPs, ESMPs).

This ESMF is developed to guide the implementing agencies, (LEC and DoE) in the environmental and social
screening and subsequent environmental and social assessment of subprojects during project implementation to be funded under the Project. The procedures outlined in the ESMF serve to ensure that potential adverse environmental and social impacts that may be generated as a result of each project component are identified early, and appropriate safeguard instruments are prepared prior to implementation to avoid, minimize, mitigate and, in cases where there are residual impacts, offset or minimize adverse environmental and social impacts.

The purpose of the ESMF is thus to assist LREEAP to administer necessary environmental and social management (including risk management of environmental and social impacts) procedures and measures of proposed sub-project(s) whose infrastructure design and location are unknown at this stage and may change during project implementation. Therefore, this ESMF serves as a framework which will guide in the development of appropriate environmental and social management safeguards instruments for all the project components which are to be formulated when detailed feasibility studies and technical design details become available.

The ESMF is a guidance and decision-support tool for LREEAP and stakeholders. As an overarching guideline document, the ESMF provides assurances that LEC and DoE:

- Assess the potential adverse environmental and social impacts associated with sub-projects activities;
- Establish clear procedures and methodologies for the environmental and social planning, review, approval and implementation of sub-projects;
- Consider socio-cultural and gender sensitivities and environmental values prevailing in areas where the proposed sub-project(s) would be implemented;
- During project formulation and design, monitoring plans are developed to track implementation of site-specific safeguards instruments to mitigate adverse environmental and social impacts which may arise during construction and operational phases;
- Develop Environmental and social management safeguard instruments such as sub-project specific Environmental and Social Management Plans (ESMPs), Abbreviated Resettlement Action Plans (ARAPs)/Resettlement Action Plan (RAPs) and Environmental Codes of Practices (ECoP) are suitably prepared and followed; and
- Ensure that safeguard instruments are compliant with WBG environmental assessment (EA) operational policies and procedures as well as GoL national laws and regulations.
Clarify the roles and responsibilities of the stakeholders and define the monitoring and surveillance framework for implementation of the ESMF;

- Determine budget implications for environmental and social project management

This ESMF is also intended to ensure that any positive project impacts can be further harnessed to ensuring long term sustainability of the project. LEC and DoE being the developers in this project, through their contractor(s), will have the overall responsibility in implementing the ESMF in order to ensure adequate compliance to the mitigation measures proposed in the ESMF for each of the project components.

This ESMF will also serve as a ready reference to the Project Implementation Units (DoE and LEC) and their key stakeholders namely contractors, sub-contractors, external consultants and other statutory agencies to ensure that the project adopts a strategic approach to mitigate or avoid the identified environmental risks.

It is expected that most of the mini-grid subproject investments to be funded by the off-grid component of the project will be implemented by private investors / operators. All project funded activities, including the subprojects that are implemented by private parties, will be required to comply with the World Bank Safeguard Policies and the project's ESMF. Diversion of safeguarding responsibilities to investors under OP 4.03 will not be considered. This means that the project implementation agencies are also fully responsible for the scoping and reviewing and monitoring of safeguard requirements.

For all types of subprojects, consultation will need to be initiated with stakeholders (e.g., residents, businesses, landowners, communities, Local Government Structures, NGOs, government agencies, etc.) early in subproject definition and carry on construction and into operation. LEC and DoE use a range of consultation methods (community meetings, local radio and newspaper media, pamphlets, posters, customer service counters, dedicated customer call center, etc.) with which to convey information and receive input from individuals and communities regarding their support, issues and concerns. LEC and DoE will follow the process of free, prior and informed consultation to obtain necessary input on its subprojects (see Chapter 8 – Public Participation and Involvement).

2.1 KEY ACTIVITIES OF THE PROJECT SUBJECT TO THE ESMF
This section is to be read in conjunction with Chapter 1 which details all the project components. As noted in Chapter 1, the project will involve four components as follows:

**Component 1: Grid extension to Peri-Urban Areas of Lesotho**

Construction works required to electrify select industrial and commercial loads in peri-urban areas of Lesotho as well as the provision of connections to residential customers in nearby areas will trigger the World Bank OP.4.01 on environmental assessment. Site identification will be conducted in consultation with LNDC (and will be aligned with LNDC’s Strategic Plan 2018-2022), DoE and LEC based on the potential for job creation and maximizing socio-economic development in the peri-urban and industrial parts of Lesotho. Since the details and the final selection of the sites will be confirmed and validated by the geospatial electrification analysis based on a least cost approach, an ESMF has been developed to ensure that studies carried out under the LREEAP to prepare the grid extension component, address and identify measures to avoid and minimize environmental and social impacts, as much as possible, and where they cannot be avoided, the impacts are adequately identified/assessed and necessary mitigation measures designed and implemented following relevant kingdom of Lesotho environmental and social legislation and the World Bank’s safeguards policies.

**Component 2: Electrification by Mini-Grids**

This component will support the electrification of areas where electricity supply through mini-grids represents the least-cost option from a country perspective, as underpinned by the EMP and geospatial analysis. Sub-component 2A will fund the rehabilitation and upgrading of Semonkong, a hydro-based mini-grid with diesel as an alternative electricity supply source. Sub-component 2B will support the electrification of areas where electricity supply through mini-grids represents the least-cost option from a country perspective, as underpinned by geospatial analysis and the requirements of the ESMF.

**Component 3: Technical Assistance**

Given that the market is very nascent, the technical assistance component will play a critical role in upstream and downstream capacity building. The scope of works for investments to be financed is yet to be defined. Therefore, the ESMF will ensure that once the scope of works has been defined, sub-project specific
safeguards instruments such as ESMPs and RAPs will be prepared for those identified sub-projects in parallel with the preparation of the detailed designs.

**Component 4: CERC**

The specific activities to be financed by the funds reallocated to CERC are event and demand driven. Annexure 3 of the ESMF describes additional information on the environment and social safeguard (ESS) requirements for the implementation of activities under Component 4 which can be identified and selected to provide short-term bridge financing exclusively for the immediate recovery needs related to an eligible emergency consistent with CERC’s purpose. The guidance and procedures included in this CERC ESMF should be considered in the Emergency Response Manual (ERM) that will be prepared during the project implementation, and will contain the environmental and social requirements, if the CERC is activated. The guidelines and procedures included in this ESMF CERC, Annex 5, considers the Bank’s safeguard requirement for the CERC.

**Application of World Bank Safeguards and ESMF to Other Financiers**

The World Bank Environmental and Social Safeguards and this Environmental and Social Management Framework apply to all components or sub-projects of the LREEAP and all its associated facilities, even if that component or sub-projects and or facilities are funded entirely by another Development Partner or private party.
CHAPTER 3: BASELINE DATA

The project will be implemented nationwide throughout the country. The following section presents a description of the existing environment, comprising the bio-physical and socio-economic conditions of Lesotho.

3.1. BIO-PHYSICAL ENVIRONMENT

3.1.1 Geophysical environment

The Kingdom of Lesotho is a mountainous country in Southern Africa, with a unique geography as it is landlocked by the Republic of South Africa (RSA). Roughly 80 percent of Lesotho’s land is more than 1,800 meters above sea level; the average elevation is 2,161 m. Lesotho covers a surface area of 30,648 km² between latitudes 28°41’ and 31°41’ south and between longitudes 27º00’ and 29º30’ east, just to the right of the centre of the Republic of South Africa (RSA).

Altitudes in Lesotho range from around 1,388 masl in the lowlands, at the confluence of Senqu and its tributary Makhaleng, to over 3,000 masl in the highlands with a peak of 3,482 masl, Thabana, Ntlenyana (the highest in Southern Africa), with 80% of the territory lying over 1,800 masl. The 200 km Drakensberg-Maloti mountain range separates Lesotho and the provinces of KwaZulu-Natal and Eastern Cape of RSA.
3.1.2 Climate

The climate in Lesotho is continental and temperate with four distinct seasons; it receives 85% of its annual rainfall in the October-April period, averaging 700 mm/yr. (below the world average of 800 mm/yr.).

3.1.3 Topography

Lesotho is divided into four topographical regions, namely the Highlands (>2,200 masl), Foothills (1,800-2,200 masl), Lowlands (1,400-1,800 masl) and the Senqu River Valley as shown in figure 4 above.

Agro-ecological zones

There are three major ecological zones in Lesotho: Highland Grassland, Afromontane Grassland and Alpine Grassland, although some authors also refer to a fourth zone, the Senqu Valley Zone. These are home to a variety of grasses, trees, shrubs, flowering plans and associated fauna. The grasslands zones distribution map includes twelve vegetation types.
3.1.4 Soil

Soils in Lesotho are described in terms of the Benchmark Soil Series (Cauley, 1986) in terms of soil fertility, soil profile, likely settings, extent and resistance to erosion and erosion hazard. The Benchmark Soils are confined to those areas of Lesotho that receive at least 625mm of rainfall per year and have elevations of less than 2400mamsl.

The soils derived from the Karoo sedimentary sequences as outlined in Figure 5 below and basalt overlay on the western Lowland are the country’s main cultivable areas and are typically inherently low in fertility, quite poorly-structured, have low water-holding capacities, and are easily eroded, even on slopes gentle enough for cultivation. Sepane, Thabana (Arcadia), Sephula (Estcourt) and Rensburg Soil Forms dominate the moist bottomlands while the Glenroase, Khabos (Bonheim), Avalon, Qalaheng (Clovelly) and Mayo forms dominate the outcrops and slightly elevated areas. Mispah and Glenrosa soil forms are dominant in the west-facing Foothills and on the slopes of mesas. The soil surface is strewn with sandstone rocks and boulders.

Figure 5: Soil types of Lesotho
3.1.5 Heritage features
Lesotho has rich cultural heritage resources. The archaeological record comprises of a number of Middle Stone Age (MSA), Late Stone Age (LSA) and Iron Age (IA) sites as well as rock art.

3.1.6 Floral biodiversity
Lesotho falls within the grassland biome, with small-scattered thickets and woodlands occurring in the valleys and along the foothills. As previously mentioned, Lesotho has been divided into four ecological zones, the Lowlands, Foothills, Senqu Valley and the Mountain.

3.1.7 Faunal Biodiversity
Detailed information on the animals of Lesotho is very scarce, and as such little is known about their abundance and distribution. Areas that have been surveyed in detail are Sehlabathebe National Park, Phase 1A and 1B of the Lesotho Highlands Water Project (Mahlelebe, 2018).

3.1.8 Terrestrial species Ecosystem

3.1.1.1 Mammals
Lesotho has the lowest species richness in the Southern African region mainly due to the harsh climatic conditions, as well as human activities such as hunting with dogs. Currently the mammal species are estimated at 52 with 14 possibly listed under South African Red data Book (Lynch, 1994). It is estimated that historically 70 species occurred in Lesotho. The Other information available on mammals is from the baseline biology survey of the phase 1A of the LHWP by Loxton, Venn and Associates and Biological Survey of Phase 1B by Afridev Consultants. No Red Data species are within the vicinity of the sites to be developed.

3.1.1.2 Reptiles
The limitations of the study are that several assumptions have been made about presence or absence of species of reptiles from the footprint area. No detailed work on reptiles was carried out at the site. There are no literature available which accounts for any distribution or abundance in Lesotho. It is likely that anthropogenic disturbances have changed the availability of specific habitats in the area which is detrimental to the species. It is also likely that some reduction has occurred due to habitat degradation arising from land use practices, the fires and the frequency of contact with human population. Reptiles in Lesotho generally
get killed by people on contact. Reptiles are seasonally active, spending the harsher winter months in seclusion, usually burrows, under rocks or in crevices emerging only under more suitable climatic conditions.

3.1.1.3. Avian Biodiversity
The desk top study revealed that the birds exhibit the greatest diversity amongst the vertebrates with 318 extant species and 22 extinct species. The identified bird species are based on the community information as well as site investigation. The cliffs and rock faces along the Maletsunyane River are breeding grounds for Red Data listed Southern Bald Ibis (*Geronticus calvus*) and Bearded Vulture. The Southern Bald Ibis was also seen all over grazing lands (picture 1) and near homesteads (picture 2) (SM Consulting, 2018).

**Picture 1:** Southern Bald Ibis in the rangelands of Semonkong

![Southern Bald Ibis in the rangelands of Semonkong](image1.jpg)

**Picture 2:** Southern Bald Ibis close to homestead at Mosoang

![Southern Bald Ibis close to homestead at Mosoang](image2.jpg)
3.2. DESCRIPTION OF THE SOCIAL ENVIRONMENT

3.2.1 Geographical context

The Kingdom of Lesotho is located in Southern Africa and completely enclaved by the Republic of South Africa. It covers an area of 30 355 km² and had a population of 2 007 201 according to the 2016 Census. It is the only independent state in the world that lies entirely above 1 000 metres in elevation, with over 80% of the country above 1 800 metres. The 2011 Lesotho Demographic Survey (LDS) estimated the total arable land on 3 248 km², which is just over 10% of the total area of the country.

The country is divided in four ecological zones based on climate and agro-climatology:

- Mountains (at altitudes of between approximately 2 000 – 3 384 metres above sea level (masl)) – about 59% of the country;
- Senqu River Valley (1 000 – 2 000 masl) – about 9% of the country;
- Foothills (1 800 – 2 000 masl) – about 15% of the country; and
- Lowlands (less than 1 800 masl) – about 17% of the country.
The proposed sub-projects are located in all the four (4) ecological zones of Lesotho.

3.2.2 Development context

Lesotho is classified as a low human development country based on its 2018 Human Development Index (HDI) score. With a Gini Coefficient of 54.2, the country has an unequal distribution of income. The Gender Development Index indicates that there is equality between men and women in terms of Lesotho’s HDI achievements. The Gender Inequality Index suggests inequality between men and women in terms of reproductive health, education, political presentation and the labour market. The 2018 Multidimensional Poverty Index indicates that approximately 57.1% of households live below the National Poverty Line in terms of income. Approximately 33.64% of the population can be defined as multi-dimensionally poor. The Living Standard dimension is the greatest contributor to overall poverty, with a contribution of 57.84%. Indicators that form part of the Living Standard dimension is water, sanitation, electricity, assets, cooking fuel and type of floor.

Lesotho Ranks 30th out of 51 African countries on the Sustainable Development Goals (SDG) Index. The country is maintaining its achievement on Climate Change and is on track to achieve the goals of Industry, innovation and infrastructure and Partnerships for the goals by 2030. Scores for Gender equality, Clean water and sanitation, Sustainable cities and communities, and Life on land is increasing at a rate above 50% of the growth rate, but below the rate needed to achieve the goals by 2030. Lesotho is stagnating or increasing at a rate below 50% of the growth rate needed to achieve the following goals by 2030: No poverty, Zero hunger, Good health and well-being, Quality education, Affordable and clean energy, and Justice and strong institutions.

3.2.2 Administrative context

Lesotho is a hereditary constitutional monarchy and the King is the head of state. It has a bicameral parliament, consisting of the National Assembly and the Senate. The National Assembly consists of 120 elected members. Eighty members are directly elected from the constituencies that the country is divided into, and the other forty are elected through proportional representation. The Senate is the upper chamber of the parliament and is made up of 22 hereditary Principle Chiefs and 11 Senators nominated by the King on advice of the Council of the State. The country is divided into ten districts, namely Botha-Bothe, Leribe, Berea,
Maseru, Mafeteng, Mohale’s Hoek, Quthing, Qacha’s Nek, Mokhotlong and Thaba-Tseka. The area for the proposed project is located in the Leribe and Berea Districts. The districts are further divided into constituencies (80 in total), which consist of 129 local community councils.

### 3.2.3 Demography

The total population of Lesotho is 2,007,201 with 982,133 being males and 1,025,068 as females and this suggests an increase of 130,568 persons from the Census of 2006 (Population and Housing Census (PHC) report, 2016) as illustrated by figure 6 below. In return, the increase indicates the annual growth rate from 2006 to 2016 of 0.68 which reflects a substantial increase from 0.08 which was experienced in 2006 census.
Figure 6: Trend in Population growth

![Graph showing population growth](image)

Source: PHC Report, 2016

Figure 6 and table 2 that follows, further indicate lack of growth for the three districts of Lesotho namely, Mafeteng, Mohale’s Hoek and Quthing which might be attributed to many factors of which insufficient supply of electricity might be one of the factors. It is therefore anticipated that the project might contribute towards the increase in population due to the resuscitation of industries in the Mafeteng district amongst others.

![Comparison of district population](image)
**Figure 7:** Comparison in growth in all the ten districts of Lesotho.


The figure 7 above and the table below further shows trend in the population growth in the different districts of Lesotho.

**Table 1:** Trend in population growth and distribution in the 10 districts of Lesotho

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Urban</td>
<td>293,323</td>
<td>421,655</td>
<td>685,938</td>
<td>43.8</td>
<td>62.7</td>
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<td>Rural</td>
<td>1,414,239</td>
<td>1,444,816</td>
<td>1,321,263</td>
<td>2.2</td>
<td>-8.6</td>
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<td>District</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>BotheBothe</td>
<td>109,905</td>
<td>110,320</td>
<td>118,242</td>
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<td>7.2</td>
</tr>
<tr>
<td>Leribe</td>
<td>302,664</td>
<td>293,369</td>
<td>337,521</td>
<td>-3.1</td>
<td>15.0</td>
</tr>
<tr>
<td>Berea</td>
<td>241,946</td>
<td>250,096</td>
<td>262,616</td>
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<td>Maseru</td>
<td>393,154</td>
<td>431,998</td>
<td>510,186</td>
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<td>20.2</td>
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<td>Mafeteng</td>
<td>213,455</td>
<td>192,621</td>
<td>178,222</td>
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<td>-7.5</td>
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<tr>
<td>Mohale's Hoek</td>
<td>185,459</td>
<td>176,928</td>
<td>165,590</td>
<td>-4.6</td>
<td>-6.4</td>
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<td>Quthing</td>
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<td>124,048</td>
<td>115,469</td>
<td>-2.8</td>
<td>-6.9</td>
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<td>Qacha's Nek</td>
<td>72,886</td>
<td>69,749</td>
<td>74,566</td>
<td>-4.3</td>
<td>6.9</td>
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<td>Mokhotlong</td>
<td>86,468</td>
<td>97,713</td>
<td>100,442</td>
<td>13.0</td>
<td>2.8</td>
</tr>
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<td>ThabaTseka</td>
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<td>129,881</td>
<td>135,347</td>
<td>0.9</td>
<td>4.2</td>
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<tr>
<td>Lesotho</td>
<td>1,862,275</td>
<td>1,876,633</td>
<td>2,007,201</td>
<td>0.8</td>
<td>7.0</td>
</tr>
</tbody>
</table>

Source: PHC Report, 2016

Table 2 and figure 8 below, show that Berea, Maseru and Leribe had the highest population densities while Mokhotlong and Thaba - Tseka are among the districts with the lowest densities of 24.1 and 27.8 sq.km respectively and this translates to the fact that for every 100sqkm in Berea there are 132.9 persons. While Thaba – Tseka there are 24.1 persons for every 100sq km.
Figure 8: Number of people/KM² in all the districts

Table 2: Population density per area

The location of the project in the districts such as Mokhotlong and Thaba – Tseka will enhance the socio-economic status of the people living in those districts as well as increasing the number of people per square kilometre.
3.2.4 Livelihoods

Lesotho is divided into five livelihood zones namely: Foothills, mountains, Northern Lowlands, Southern Lowlands and the Senqu River valley livelihood zones as figure 9 below depicts.

![Lesotho Livelihood Zones](image)

**Figure 9:** Lesotho’s livelihood zone

**Source:** Lesotho Vulnerability Assessment Committee, 2011.

3.2.5 The Foothills Livelihood Zone

This zone cuts a numerous district which include Butha Buthe, Leribe, Berea, Maseru, Mafeteng, and Mohale’s Hoek and it is one of the highly productive zones. The main crops grown in this zone include maize, sorghum and some beans. Although the zone is dependent on crops, there is also communal grazing of livestock such as cattle, goats and sheep. The main sources of household cash income include crop and livestock sales supplemented with self-employment (Lesotho Rural Livelihood Baseline Profile, 2012). There are no organised staple food markets for purposes of buying and selling locally produced commodities. The main form of local trade is informal and takes place within the villages, by households buying and selling among themselves. Harvesting for sorghum is done in May to June, maize June to July and beans March to April. Crop sales take place all year round. Lean season is mostly experienced in December and January and food purchases happen throughout the year. Local labour for weeding starts from November to January,
harvesting labour starts from March to July. However, the season is fully utilized for agricultural production in this livelihood zone from November to March (Lesotho Rural Livelihood Baseline Profile, 2012).

Wealth distribution in the zone is primarily determined by the area of land cultivated and number of livestock owned mainly for purposes of consumption. There are four wealth groups found in the foothills livelihood zone namely the very poor, poor, middle and better off who represent about 24%, 36%, 29% and 11% of the households respectively (Lesotho Rural Livelihood Baseline Profile, 2012). All four wealth groups in this zone are able to meet their basic food requirements in most years. The main sources of food are own crop production; livestock products; labour exchange and direct market purchases supplemented with the Government supported school feeding program. The main sources of household cash income in the livelihood zone are sale of livestock and crops; self-employment and other gifts. Crop production is mainly at subsistence basis and primarily for household consumption. The main hazards of this zone are listed below:

- Climate change hazards such as drought and livestock diseases;
- Failure of the maize and sorghum crop coupled with economic shocks;
- Stock theft.

3.2.6 Mountains Livelihood Zone

The Mountains livelihoods zones mainly in the Maluti Mountains and located in various parts of Mokhotlong, Botha-Bothe, Leribe, Berea, Maseru, Mohale’s Hoek, Quthing, Qacha’s Nek, and Thaba - Tseka. The topography of this zone is predominantly mountainous with narrow valleys where rivers flow. The vegetation is mainly shrubs on the mountains, and some grasslands and marshlands mainly in the valleys. The mountains include the Drakensberg range (where the mountains like Thabana-Ntlenyana Mountain, Sani top are found). The 'Maletsunyane falls, the Katse and Mohale Dams are also found in the mountains. This livelihood zone also has some form of subsistence fishing in the big dams of the Lesotho Highlands Water Project (LHWP) which have a significant contribution to the economic activities of the area (Lesotho Rural Livelihood Baseline Profile, 2012).

The main crops planted in this zone are wheat, maize, peas, beans and some sorghum for some farmers. Weeding for maize is done in November to January, while for sorghum starts from February and goes on until March. Green consumption occurs in February and March and harvesting of wheat is normally carried out from February to April and for maize in June to July. Beans are harvested between March and April, peas
and lentils in January to March, and for sorghum in May. Crop sales take place all year but the peak period is during or after harvest in June and July (Lesotho Rural Livelihood Baseline Profile, 2012). Similar to the Foothills zone, this zone is divided into four wealth groups namely the very poor, poor, middle and better-off households represented by about 24%, 26%, 29% and 11% of the households respectively. All four wealth groups in this zone are able to meet their basic food requirements in most years. The main sources of food are own crop production; livestock products; labour exchange and direct market purchases supplemented with the Government supported school feeding program (Lesotho Rural Livelihood Baseline Profile, 2012).

The main sources of household cash income in this livelihood zone are employment especially among the very poor and poor households, sale of livestock and crops and self-employment. The main form of employment is agricultural labour which is easily affected by climatic hazards such as long dry spells. This tends to reduce the household cash income required for purchase of food. The main hazards of this zone include:

- Late on set of rainfall characterized by dry spells, drought conditions, crop pests and livestock diseases;
- Early frost, dry spells and hailstorms;
- Failure to produce staple cereal crops (maize, sorghum and wheat) due to frost, crop disease and other factors.

### 3.2.7 Northern Lowlands Livelihood Zone

The Northern Lowlands livelihood zone is comprised of various parts of the three districts of Butha-Buthe, Leribe and Berea. The Zone occupies the most fertile and productive arable land in the country, as such it is regarded as the food basket of the Mountain Kingdom of Lesotho. The livelihoods of the people in the Northern Lowland livelihood zone is mainly dependent on mixed agriculture as a result of the productive soils and adequate rainfall in the area. The main crops grown in the area are maize, sorghum and beans. Vegetable production is also on a large scale primarily for consumption and the excess is normally sold to earn some cash income (Lesotho Rural Livelihood Baseline Profile, 2012). The vegetation cover in this part of the country includes trees and shrubs. Unlike other zones, this zone has experienced normal rainfall most of the past ten years. This has allowed farmers to practice agriculture with less hindrance compared with neighboring zones. Land preparation and planting normally takes place in the period October to December. Weeding follows in the period December to March (Lesotho Rural Livelihood Baseline Profile, 2012). Like
other zones, this zone has four wealth groups identified as the very poor, poor, middle and better-off households who represent about 18%, 40%, 28% and 14% of the households in the livelihood zone respectively (Lesotho Rural Livelihood Baseline Profile, 2012).

Overall all four wealth groups are able to meet their survival threshold. Crop production and to some extent livestock products are the main sources of food. However, this is supplemented by labour exchange for food, commonly known as payment in kind and direct purchases from the market especially among the poorer households. Own crops contributed about 40-80% of annual food needs during the baseline year. The main sources of household cash income vary from among the poorer and wealthier households. The main sources of cash income include Sale of crops, livestock, self-employment and others such as cash remittances. The main limitations of the local people are limited employment opportunities. Majority of households are dependent on subsistence agriculture, which makes them vulnerable to climatic hazards on two fronts (Lesotho Rural Livelihood Baseline Profile, 2012).

The hazard that threaten this zone include the following as per Lesotho Rural Livelihood Baseline Profile, (2012):

- Crop pests and diseases;
- Late onset of rainfall, dry spells and drought conditions;
- Livestock diseases;
- Stock theft;
- Hail storms;
- HIV and AIDs;
- Failure of staple cereal crops (maize, sorghum and wheat).

### 3.2.8 Southern Lowlands Livelihood Zone

The Southern Lowlands livelihood zone covers an extensive area from Maseru, Mafeteng and Mohale’s Hoek. The livelihood of the area is based on mixed agriculture comprised of crop and livestock production. The main livestock reared include cattle, goats, sheep and pigs and crops produced by the local population include maize, sorghum and beans. The zone is characterized by flat plains with desert-like characteristics like shrubs and rangelands. As a result of soil erosion and environmental degradation, the zone is mostly
characterized by shallow and infertile soils especially in Mafeteng and Mohale's Hoek districts. It is also one of the driest regions of Lesotho and even in period expected to have normal rains, the area always experiences a slow or late start of rain season characterized by rain shadows and dry spells (Lesotho Rural Livelihood Baseline Profile, 2012). The peak rain season in the Southern Lowlands is normally between the months of October to January period. The key determinants of wealth distribution in this zone are land size cultivated and livestock ownership. The four main wealth groups are the very poor, poor, middle and better-off households representing about 18%, 34%, 31% and 17% of the households in the livelihood zone. However, majority of households are still categorized poor compared with very poor by the communities. However similar trends in neighboring zones can be noted in this zone especially as regards household size (Lesotho Rural Livelihood Baseline Profile, 2012).

The main household sources of food are own crop production, livestock products, labour exchange or payment in-kind, direct market purchases supplemented with gifts and the Government supported school feeding programme. Overall three wealth groups are able to meet their minimum annual food needs, referred to as the survival threshold with exception of the very poor households. The main sources of household cash income in the Southern Lowlands zone are Local labour crop and livestock sales; self-employment in the form of firewood and wild food sales, fishing among others; and gifts/ cash remittances. The main challenges faced by households include high rates of unemployment, unskilled labour and low wage rates. This has limited household’s potential to earn cash income. Meanwhile most farmers are unable to utilize the Government supported sheep shearing sheds because of the delays in payment and quality of their wool and mohair (Lesotho Rural Livelihood Baseline Profile, 2012).

The hazards for this zone are as follows (Lesotho Rural Livelihood Baseline Profile, 2012):

- Crop pests and diseases;
- Late onset of rainfall, dry spells and drought conditions;
- Livestock diseases;
- Stock theft;
- Hail storms;
- HIV and AIDS;
- Failure of staple cereal crops (maize, sorghum and wheat).
3.2.9 Senqu River Valley Livelihood Zone

Senqu River Valley is a thin strip that lies along the Senqu River that cuts across four districts namely; Mohale’s Hoek, Quthing, Qacha’s Nek and Thaba-Tseka. Similar to other neighboring livelihood zones, the main source of livelihoods in the Senqu River Valley is mixed agriculture comprised of crop production and livestock farming. The soils are relatively poor and thinly covered with vegetation due to over grazing. The main type of vegetation is shrubs and rhus species. The population of the zone is mostly dependent on crop production, livestock rearing and agricultural/non-agricultural casual labour employment for their main sources of livelihoods (Lesotho Rural Livelihood Baseline Profile, 2012).

Rain season in Senqu River Valley livelihood zone normally starts in the month of October and ends in April. However, the rainfall is normally erratic and characterized with dry spells. Planting also starts during the onset of rains in October. Not all farmers are able to plough because they cannot afford draught power for both ploughing and planting. The communities identified four wealth groups namely the very poor, poor, middle and better-off households representing about 26%, 33%, 26% and 15% of the households in the livelihood zone with determinants of wealth distribution in the Senqu River Valley livelihood zone are size of land cultivated and livestock owned (Lesotho Rural Livelihood Baseline Profile, 2012).

All four wealth groups are able to meet their annual food needs, sometimes referred to as the survival threshold during the baseline or year. The main household sources of food are own crop production, direct purchases from the market, labour exchange or payment in-kind supplemented with the Government supported school feeding programme targeting the free primary education children in Government schools. The labour exchange or payment in-kind is a major source of food among the very poor and poor households. The Lesotho Rural Livelihood Baseline Profile (2012) details the hazards that threaten the zone as

- Crop pests and diseases;
- Drought conditions;
- Livestock diseases;
- Stock theft;
- Hail storms;
- Environmental degradation;
- Failure of staple cereal crops (maize, sorghum).
3.3 Broader social issues

3.3.1 Labor Influx and associated social impacts.
Implementation of activities under Components 1 and 2 may require external skilled and unskilled labor to project sites and to establish labor camps, thus resulting in labor influx into beneficiary communities. However, the PIU is recommended to use unskilled local labor in order to minimize labor influx because bringing in outside workers and establishing temporary labor camps could result in social risk to host communities especially on vulnerable groups (women and girls), including the potential for gender-based violence, sex trafficking, adolescent pregnancy and child abuse.

3.3.2 Gender analysis and related issues
In order to gain insights into key gender gaps, a preliminary analysis was conducted for the overall energy sector. The aim was to summarize gender gaps in the energy sector across multiple data sources available for Lesotho and investigate the existence of a link between key gender gaps and the energy sector:

• Head of household: Nationwide, 35 percent of households are headed by women. Female-headed households are slightly more likely than male-headed households to live in urban areas: of all male-headed households' 29.5 percent are in urban areas, and the rest are in rural areas. For female-headed households, 30.1 percent are in urban areas and the rest are in rural areas.

• Electricity access and household spending: While in all the quintiles of household spending, male-headed households have higher levels of access to electricity than female-headed households (between 2 – 5 percent higher), the disparity is higher in the lower quintiles compared to higher quintiles.

• Access to cooking fuels: Female-headed households have higher levels of access to clean cooking fuels compared to male-headed households. 29 percent of female-headed households use electricity and LPG for cooking compared to 26 percent for male-headed households. Use of kerosene for cooking in female and male headed households are 5 percent and 6 percent respectively, and wood is 49 percent and 53 percent.
3.3.3 Gender Based Violence (GBV)
Lesotho has made efforts to attain gender equity and equality, but legislation, customary law and practice still contain considerable gaps and GBV incidents are common. The GBV risk for the project will be assessed thoroughly in the ESMP once potential subproject sites and specific project activities have been identified.

Interventions will be tailored to project realities and in-country context and may include e.g. increasing girls and young women’s exposure to jobs in the renewable energy sector, vocational programs, unconscious bias trainings, career choice guidance, addressing child care service gaps, institutionalizing GBV prevention and response mechanism, establishing women’s professional networks and access to upskilling and training/scholarship opportunities.

In order to prevent and address the potential social risks related to the labor influx, codes of conduct on child protection and gender-based violence will be integrated in the bidding documents and in the contracts of all employees, contractors, and consultants engaged in the project and educating the communities on proper conduct.

3.3.4 Social inclusion
The Project will be guided by a Social Impact Assessment as part of the ESMP and will develop a detailed communications plan. The project RPF includes a GRM. Citizen engagement will be a key component and the PIU will oversee ongoing and meaningful consultation in communities. A social assessment (SA) will therefore be under implementation to identify potential social risks, local people’s social concerns and opinions for the social dimension of the project, especially on the vulnerable groups of the society (such as the elderly, disabled, women, orphans and vulnerable children). The mitigation measures will then be recommended to address the identified potential negative social impacts to local communities. The Project will establish a citizen’s feedback mechanism and grievance redress system. In addition, to prevent and
respond to gender-based violence during project implementation, measures will be taken to sensitize and train PIU, implementing agencies and contractors against gender-based violence.
CHAPTER 4 POLICY AND LEGAL FRAMEWORK

This chapter identifies the Lesotho legal and regulatory framework, the World Bank Policies and regional and international conventions and treaties that will regulate the planning and development of the proposed project.

4.1. NATIONAL POLICY AND LEGAL FRAMEWORK

The Table 3 below indicates the relevant national laws, policies and regulations:

<table>
<thead>
<tr>
<th>Legislation, Policy, Regulation, Guideline</th>
<th>Relevance to the Project</th>
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<tbody>
<tr>
<td>The Constitution of Lesotho (1993)</td>
<td>The mandate on the environment is derived from section 36 of the Constitution of Lesotho, which states that Lesotho shall adopt policies designed to protect and enhance the natural and cultural environment of Lesotho for the benefit of both present and future generations and shall endeavour to assure to all its citizens a sound and safe environment adequate for their health and well-being. Therefore, the project needs to ensure that no Mosotho is deprived of their livelihood whether present or future. This will be mitigated through the ESMP which will be developed and approved by the World Bank and the Department of Environment.</td>
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The Constitution of Lesotho protects citizens from the arbitrary seizure of property. Article 17(1) states that “no property, movable or immovable, shall be taken possession of compulsorily, and no interest in or right over any such property shall be compulsorily acquired, except where the following conditions are satisfied:

- The taking of possession or acquisition is necessary in the interests of defence, public safety, public order, public morality, public health, town and country planning or the development or utilization of any property in such manner as to promote the public benefit; and
- The necessity therefore is such as to afford reasonable justification for the causing of any hardship that may result to any person having an interest in or right over the property; and
- provision is made by a law applicable to that taking of possession or acquisition for the prompt payment of full compensation”
Section 47, Article 17(2) grants a person with an interest in or right over property that is compulsorily acquired “a right of direct access to the High Court for:

- the determination of his interest or right, the legality of the taking of possession or acquisition of the property, interest or right and the amount of any compensation to which he is entitled; and
- The purpose of obtaining prompt payment of that compensation.”

**Environment Act (2008)**

The Environment Act is meant for the protection of the environment and all its resources, hence sections 19(1) and 20 (1) which require preparation of a Project Brief (PB) and/or ESMP which entails mitigation measures to offset adverse impacts of proposed development projects. Section 25 (1) specifies that no person shall operate, execute or carry out a project or activity specified in the First Schedule without license/approval issued by the Director of the Department of Environment (DoE).

The Guidelines for Environmental Impact Assessment in Lesotho (2009) sets out the steps to be taken in carrying out the ESIA process, and the DoE uses this document in reviewing the ESIA and as such compliance to the guidelines is critical for the development of the practical, implementable and easy to monitor ESMP.

Public Participation is one of the requirements for this Act and its regulations in order to ensure that all interested and affected stakeholders are consulted. The consultation will assist the developer which is LEC in this case to incorporate all the views of the stakeholders during the project cycle and also to ensure that appropriate action is taken to mitigate or avoid the concerns raised by the interested or affected parties amongst many.

Section 95 of the same Act indicates the need for information dissemination to the public about the project and as such, this project will align itself to the provisions of this Act in order to ensure that the public is aware of the projects, its potential impacts and benefits and also to gather information from the public as well ownership of the project by the public.

**Historical, Monuments, Relics, Fauna and Flora Act (1967)**

This Act calls for the protection and preservation of all the historical monuments and it prohibits their destruction as well. Upon implementation, care will be taken to not harm any of the listed items in the Act through the ESMP. These include crave yards amongst others.

**Public Health Order (1970)**

It provides for among other things requirements for human dwellings and operating in healthy housing and including issues of sanitation as a measure of disease prevention. This will also be taken care of during the development of the ESMPs.
<table>
<thead>
<tr>
<th>Act/Act (Year)</th>
<th>Description</th>
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<tbody>
<tr>
<td>Land Act (2010)</td>
<td>Governs land ownership and occupation, and the acquisition of property for public and development purposes. The Act also covers the grant of title to land; the administration of land; the expropriation of land for public purposes; the grant of servitudes; and the creation of land courts and the settlement of disputes relating to land. Sections 53 and 54 make provision for the establishment of public servitudes by the Government, a local council or a statutory corporation and the payment of compensation which this project will abide through the development, implementation and monitoring of the ESMP and the RAP.</td>
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<tr>
<td>Sections 53 and 54 make provision for the establishment of public servitudes by the Government, a local council or a statutory corporation and the payment of compensation. Section 56 stipulates that compensation for compulsory acquisition of property shall be at market value. Section 58 (2) states that “in assessing compensation, regard shall be had: • To the value of the property as certified by an odd number of valuers, one of whom shall be the Government valuer, having regard to the present and future replacement value; and • To the expenses incidental to any necessary change of residence or of place of interest.” Compliance through the RAP and the ESMP is critical. Section 60 stipulates that in all cases of compulsory acquisition compensation must be paid before conclusion of expropriation.</td>
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<tr>
<td>Local Government Act (1997)</td>
<td>This Act provides for establishment of local authorities and lists several public/community considerations during project construction and operation. The project team will align with the provision of the need for community consultations and awareness with regard to the resources under the local Government Authority.</td>
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<tr>
<td>Legal Capacity of Married Persons Act (2006)</td>
<td>This is the Act that confers equal powers on both husband and wife married in community of property which means that it gives equal capacity to dispose of the assets of the joint estate, contract debts for which the joint estate is liable and administer the joint estate. This Act requires that both spouses must give consent when entering into any agreements concerning the joint estate. The project will be in line with the provisions of this Act during the compensation process and land acquisitions and will be documented in the ESMP and the RAP.</td>
</tr>
<tr>
<td>Workmen’s Compensations Act (1977)</td>
<td>This Act provides for the compensation of workmen for injuries suffered in the course of their employment and to provide for the payment of medical expenses in respect of such injuries and for</td>
</tr>
<tr>
<td>Energy Policy (2015-2025)</td>
<td>The vision of the policy is that energy will be universally accessible and affordable in a sustainable manner with minimal impact on the environment. One of its goals is to ensure security of energy supplies to meet the national requirements from diversified sources that are subject to local resources, regional agreements and economic feasibility and to ensure that the energy sector will contribute towards poverty alleviation in Lesotho through the creation of income generating opportunities that sustain and improve the lives of people in the country through facilitating the provision of affordable technologies and services. The project is aligned to the vision and goals of the policy as its main object is to ensure a reliable supply of electricity which will in turn ensure the security of supply and to contribute towards poverty alleviation through economic development.</td>
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<tr>
<td>Forestry Act (No. 91 of 1998) and National Forestry Policy (2008).</td>
<td>The Act provides for the sustained management of forests and forest reserves, and for the protection and preservation of forests and forest produce. The project will align itself to the protection of forests as electricity network is not supposed to be next to or above forests for safety reasons and subsequently protection of the public/communities.</td>
</tr>
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</table>

According the Labour Code, the minimum age for work is 15 (Article 124(1) of the Labour Code; Article 228(1) of the Children’s Protection and Welfare Act (20; 21), and Minimum Age for Hazardous Work is 18 (Article 125(1) of the Labour Code; Article 230(1) of the Children’s Protection and Welfare Act (20; 21). The project will observe the requirements of these laws and regulations regarding child labour. |
| Gender and Development Policy (2003) | The overall goal of the policy is to take gender concerns into account in all national and sectoral policies, programmes, budgets and plans in order to achieve gender equality in the development process. The Policy indicates that the above can be achieved through:

- Ensuring equal opportunities for males and females in the development process to promote better standards of living and to achieve economic efficiency for all.
- Ensuring equal access to education, training, and health services and control over resources like land and credit.
- Ensuring that gender sensitive laws exist and are enforced.
- To promote equal:
  i. Opportunities and participation in politics and decision-making. |
| Decision-making in sexuality matters to reduce the spread of HIV/AIDS and other STIs.  
- To provide direction for development of effective awareness creation programmes on causes and gender-based violence and of mechanisms geared at eradicating such problems.  
- To guide in allocation of resources and public expenditure in a manner that ensures equal beneficiary of both males and females.  
- To set guidelines for public awareness and promotion of the link between gender equality and development through media  
- To conserve positive and mitigate negative aspects of Basotho culture to promote equality of men and women and boys and girls also to sustain social stability and peaceful co-existence.  
- To facilitate the promotion of life skills’ acquisition to overcome gender and development problems | Decentralization Policy (2014)  
The purpose of the decentralisation policy is to deepen and sustain grassroots-based democratic governance and promote equitable local development by enhancing citizen participation and strengthening the local government system, while maintaining effective functional and mutually accountable linkages between central and local government’s entities. The specific objectives of the Policy are to:  
  i. increase citizens’ access to public services;  
  ii. ensure quality and accountable service delivery at local levels;  
  iii. increase participation of citizens and non-state organizations in governance and service delivery;  
  iv. promote equitable economic development;  
  promote livelihood and economic security;  
  v. enhance local autonomy by ensuring that local government institutions are sustainably capacitated and organised with a strong collective voice;  
  vi. promote the preservation of national values, identity and unity by re-positioning and empowering the chieftainship and other traditional institutions |

| National Strategic Development Plan 2012/13 – 2016/17 | This plan sets out the following:  
1. Pursue high, shared and employment creating economic growth  
2. Develop key infrastructure  
3. Enhance skills base, innovation and technology adoption for accelerated development  
4. Improve health, combat HIC and AIDS and reduce vulnerability  
5. Reverse environmental degradation and adapt to climate change |
6. Build effective institutions and promote peace and democratic governance. The project will therefore align itself to the goals set out by the NSDP especially bullet 2, 3, 4 and 5 through the development of the implementable ESMP.

| Code of Conduct | LREEAP will align with the World Bank code of conduct (Annexure 6) for all its labour related matters in conjunction with the above Lesotho labour Code. |

4.2. INTERNATIONAL AND REGIONAL CONVENTIONS/TREATIES

4.2.1. Declaration on Gender and Development by SADC.

This declaration emphasises against discrimination on a person based on gender amongst other things. It is through the declaration that Member states committed to numerous aspects such as protecting and promoting the rights of women and children and also making sure that quality health services and reproductive services are accessible to women and men. The project is fully in line with the Declaration as reliable and accessible electricity is an enhancer of the community development which include access health services and to water through boreholes.

4.2.2. The Stockholm Convention on Persistent Organic Pollutants

Stockholm Convention is aimed at protecting the human health and the environment against the persistent organic pollutants which are chemicals that accumulate in the environment for long periods of time and are distributed geographically. The project will observe the articles of this convention and abide by them through elimination of procurement of PCB containing oil for the transformer oil and also disposal of PCB containing oil and equipment inorder to minimize the exposure of the public to the PCB.

4.2.3. United Nations Framework Convention on Climate Change

This is a treaty that aims to minimize the greenhouse gas emissions to an acceptable limit that do not harm the environment or accelerate climate change. The project will not be emitting any greenhouse gases and therefore will not be contributing to the acceleration of climate change which has had adverse impacts to the Basotho through extreme weather patterns.

4.2.4. United Nations Conventions to Combat Desertification
The UNCCD is a convention meant to combat desertification and mitigate the effects of drought through effective actions at all levels. It also encourages implementation of long-term strategies that improve productivity of land and the rehabilitation, conservation and sustainable management of land and water resources in order to improve living conditions in particular at community level. LEC though it’s numerous activities adhere to the principles and objectives of the convention as there are donga rehabilitation initiatives guided by the Ministry of Forestry and Land Reclamation. These activities are undertaken in collaboration with the different Basotho communities as well as means of improving their livelihood. The proposed project also will continue to assist Basotho in projects through donga rehabilitation activities where donga’s threaten the extended grid.

4.3. WORLD BANK SAFEGUARDS POLICIES

The World Bank Environmental and Social Safeguards Guidelines and Operational Policies enable the integration of environmental and social considerations into the development, planning and execution of development projects. These policies are designed to: (i) protect the environment and society from the potential negative effects of projects, plans, programs and policies; (ii) reduce and manage the risks associated with implementation of project activities; and (iii) assist in better decision-making to ensure sustainability of activities. The Bank Environmental and Social Safeguard Policies provide guidance to the World Bank on the process, scope and extent of environmental and social assessment required for project evaluation. In developing this RPF care has been taken that: “All environmental and social assessments to be carried out under this assignment shall be in accordance with World Bank safeguards operational policies and procedures”, with the understanding that, where national legislation does not adequately address issues, the World Bank standards will apply.

The operations of the World Bank are guided by a comprehensive set of policies and procedures, dealing with the Bank’s development objectives and goals, the instruments for pursuing them, and specific requirements for Bank- financed operations. The core of this guidance lies in the Bank’s Operational Policies (OPs), which are critical to ensuring that potentially adverse environmental/social consequences are identified, minimized and mitigated so as to prevent “undue harm to people and their environment in the development process”.

The following Operational Policies (OPs) and Bank Procedures (BPs) are triggered by the Project:

- **OP 4.01 Environmental Assessment**:
The Project is classified as Category B as it will finance energy investments aimed at increasing electricity access (via grid extension and the deployment of mini-grids) and increasing renewable-energy based on off-grid electrification such as solar Photovoltaic (PV) or micro-hydro based mini-grids under Components 1 and 2. The impacts of the investments will largely be positive. Electrification of communities with no access to the grid will have significant impact on quality of life, including access to social services such as health care facilities and schools, and access to jobs. Investments in renewable energy will also have long-term positive impacts in reducing greenhouse gas emissions (GHG) by replacing the use of biomass and paraffin lamps at household level. However, during the construction phase of the project, temporary and site-specific negative environmental and social impacts are anticipated from site clearing activities, construction of access roads, distribution lines, PV arrays, temporary buildings and laydown areas, resulting in direct negative impacts on soil and water bodies and potential erosion of topsoil. These impacts are expected to be temporary with a relatively low intensity due to the limited environmental and social footprint of the sub-projects. Adverse impacts are anticipated to include health and safety, production of waste mainly from batteries and impacts on land and water resulting from earthmoving operations during the construction phase. Mitigation measures would include appropriate siting of sub-projects and safe disposal and or recycling of batteries. Component 3 will not finance physical investments but will finance technical assistance with no anticipated direct environmental and social impacts.

Physical civil works expected to be undertaken during project implementation that will result in environmental and social impacts including health and safety concerns for workers and surrounding communities, land acquisition - temporary or permanent physical displacement, including loss of assets and livelihoods, labour/worker influx and associated concerns such as risk of gender based violence (GBV)/sexual exploitation and abuse GBV/SEA, illicit behavior, disease transmission, child exploitation. The project might also experience some social exclusion and likely negative impacts on disadvantaged and vulnerable groups, in particular due to potential exclusion from project benefits. The ESMPs will assess GBV risks. The ESMP findings and the Bank’s GBV Risk Assessment Tool will guide the detection of GBV risks and the consequent development of mitigation and management plans. Initial stakeholder consultations were undertaken during
the preparation of the Environmental and Social Management Framework (ESMF) and the Resettlement Policy Framework (RPF). The consultation processes will be an on-going activity throughout the project cycle to ensure that stakeholders are fully engaged especially the vulnerable and disadvantaged groups.

Due to: (i) the absence of feasibility studies and engineering designs; (ii) insufficient information on routing of proposed grid extension and the distribution network for connection of new customers; and lack of sufficient information on the exact locations of investments such as PV and battery array, sub-stations, under components 1 & 2, an ESMF has been prepared for all project activities. The ESMF includes a mechanism for screening and classification of sub-projects to determine eligibility for financing and identify the appropriate sub-project safeguards instruments, which are generally expected to include ESMPs and RAP(s). The ESMF also includes institutional arrangements and roles and responsibilities for safeguards implementation, including differentiated requirements for each Implementing Entity, as well as processes and procedures for monitoring and reporting. Category A and high risk type subprojects will be excluded, as well as any subprojects that trigger Bank safeguard policies not triggered under the project. The subproject instruments prepared pursuant to the ESMF, such as ESMPs and RAP(s), will be consulted and disclosed prior to commencement of construction works during project implementation.

A detailed analysis of association will be carried out to determine the extent and relevance of the six economic development zones activities (in particular, establishment of industrial parks) to the design or performance of Components 1 and 2. The ESMF includes due diligence review procedures regarding any significant environmental and social impacts for developments deemed to be associated and/or ancillary facilities.

The Resettlement Policy Framework has been prepared to guide the PMU in avoidance, minimization and mitigation of any potential resettlement impacts associated to project activities. The Resettlement Policy Framework will be prepared to guide the preparation of Resettlement Action Plans.

- **OP 4.04 Natural Habitats**: “to promote environmentally sustainable development by supporting the protection, conservation, maintenance, and rehabilitation of natural habitats and their functions”. The OP supports the protection, maintenance, and rehabilitation of natural habitats and their functions in its economic and sector work, project financing, and policy dialogue as a result of the likely impacts to natural habitats (such as rivers during the rehabilitation and upgrading of the hydro turbine at Semonkong run-of-river mini-hydro station on the ‘Maletsunyane River - Component 2A). The Bank
supports, and expects borrowers to apply, a precautionary approach to natural resource management to ensure opportunities for environmentally sustainable development.

- **OP 4.11 Physical Cultural Resources**: “to assist in preserving physical cultural resources and avoiding their destruction or damage, including resources of archaeological, paleontological, historical, architectural, religious (including graveyards and burial sites), aesthetic, or other cultural significance”. It provides cultural heritage guidelines to avoid or mitigate adverse impacts of development projects. It is possible, although unlikely, that physical cultural resources may be encountered in excavations during the construction phase. Chance-find Procedures will be included in the ESMF to address chance find of physical cultural resources (Annexure 2). Contractors will follow these Procedures. This OP is also in line with the Historical monuments Act of Lesotho which protects the cultural heritage of Basotho and as such, the project will have to ensure protection cultural heritage of the communities around the project.

- **OP 4.12 Involuntary Resettlement**: “

Component 1 (Grid Extension to Peri-Urban Areas of Lesotho) and Component 2 (Rural Electrification by Mini-grids) may have limited land acquisition or subsequent loss of assets, income or restricted access to resources (whether related to private or communal resources) related to the construction of medium voltage grid extensions (including substations and MV/LV lines) as well as the construction of renewable energy-based mini-grids. Therefore, Involuntary Resettlement OP 4.12 is triggered to address any adverse impacts. The RPF guides the preparation and implementation of RAPs/ARAPs geared towards mitigating the direct social and economic impacts resulting from land acquisition in order to advance component 1 and 2 of construction activities, including activities undertaken by those economic zones and mini-grids that are critical for the design and performance of LREEAP. The RPF sets out the principles and objectives governing the preparation and implementation of social risks, impacts and mitigation measures when the specific impact location(s) of components 1 and 2 subprojects and associated facilities activities once they are known.

Since the exact location of the works is not yet known, a Resettlement Policy Framework has been prepared, consulted and yet to be disclosed in-country and on the World Bank external website. All RAPs will be prepared in a consultative process and will be disclosed thereafter. The RAPs will need to be disclosed prior to commencement of construction works during project implementation. OP 4.12 identifies three categories of affected people:
Those who have formal legal rights to land, including customary and traditional rights recognized under the laws of the country;

Those who do not have formal legal rights to land but have a claim to such land or assets provided that such claims are recognized under the laws of the country or become recognized through a process identified in the resettlement plan. “Such claims could be derived from continued possession of public lands without government action for eviction (that is, with the implicit leave of the government)”;

Those who have no recognizable legal right or claim to the land they are occupying.

- **OP 4.20 Gender and Development** aims “to reduce poverty and enhance economic growth, human well-being, and development effectiveness by addressing the gender disparities and inequalities that are barriers to development”. This project will aim to achieve the implementation of this OP through inclusion of all sexes in the implementation of the project.

- **OP 4.37 - Safety of Dams** is triggered due to the existence of the Semonkong small hydro which is to be supported by the Project under Sub-component 2A is a 180 kW (0.18 MW) run-of-river system with an intake pipe to the powerhouse and a small weir (approximately 1.5 meters high). Once the river water passes through the turbines and electricity is generated, the water is returned to the river downstream of the powerhouse. Due to the size of the weir, limited reservoir and geography, there are limited to no anticipated risks to human populations downstream the Semonkong associated with potential failure of the weir. Generic dam safety measures, as appropriate, will be incorporated in the safeguards instrument for this subproject including visual inspection of the weir and an engineering evaluation of the intake and headrace.

While the mini-grid sites under Sub-component 2B have yet to be selected (and thus the relevant generation type, including hydro and solar PV, has yet to be determined), any subproject that will trigger the policy will be screened out and ineligible for financing under the Project. The ESMF includes a negative list that will screen out any potential subprojects that triggers this policy under Components 1 and 2.

- **OP 7.50 International Waterways**
The majority of rivers in Lesotho are classified as International Waterways originating in Lesotho and terminating in South Africa. The micro hydro at Semonkong to be rehabilitated under Sub-component 2A sits on Maletsunyane River, which feeds into Orange River and subsequently into South Africa. However, an exception for notification to riparian countries has been effected since the project is proposed to rehabilitate an existing 180kW off-grid run-of-river mini-hydro and will not adversely change the quantity and quality of water flows to other riparian states. In addition, the ongoing scheme will not be adversely affected by the use of water downstream by the other riparian.

While the mini-grid sites under Sub-component 2b have yet to be selected (and thus the relevant generation type, including hydro and solar PV, has yet to be determined), any subproject that will trigger the policy will require project restructuring for the specific activities and be subject to due process, including riparian notification or exception to notification. The ESMF includes a negative list that will screen out any potential subprojects that triggers this policy under Components 1 and 2. This will be clearly defined in the ESMF. However, the following Ops will not be triggered by this project:

- **Forests OP/BP 4.36**

  The proposed Project will not support physical works located within forested areas or plantations and will not open up new forested areas. Any selected activity that will trigger the policy will be ineligible for financing under the Project.

- **Pest Management OP 4.09**

  The proposed Project will not involve procurement of pesticides or fertilizers and does not have the potential to lead to increased use of pesticides or fertilizers. Any selected activity that will trigger the policy will be ineligible for financing under the Project.

- **Indigenous Peoples OP/BP 4.10**

  The policy will not be triggered as there are no indigenous peoples in Lesotho.

- **Projects in Disputed Areas OP/BP 7.60**

  The project will not be located in any known disputed areas as defined in the policy.

- **The World Bank Group’s Environmental, Health and Safety Guidelines**
The World Bank Group’s (WBG) Environmental, Health and Safety Guidelines also known as the (EHS Guidelines) are applicable to the project. These guidelines entail technical reference documents with general and industry-specific examples entailing Good International Industry Practice (GIIP). The GIIP are deemed achievable in new facilities at reasonable costs by employing the use of existing technologies.

When host country regulations differ from the levels and measures presented in the EHS Guidelines, project will be expected to achieve whichever is more stringent. If less stringent measures than those provided in the EHS guidelines are deemed appropriate for the project, then a detailed justification must be provided for any proposed alternatives through the environmental and social risks and impacts assessment process. The general EHS guidelines and the specific EHS Guidelines for Electric Power Transmission and Distribution will be applied to the project.

4.4. COMPLIANCE NATIONAL PROCEDURES AND WORLD BANK POLICIES

Table 5 below tabulates the compliance requirements of the involuntary resettlement aspects of the proposed project with GoL legislation and World Bank safeguards policies. An understanding is that, where national legislation does not adequately address issues, the World Bank standards will apply. This ESMF has been completed in compliance with the requirements of the legislation as elaborated in sections above and policies, to ensure that all related future ESMPs will conform to the principles and standards contained in this document.
**Table 4: Compliance status of GoL legislation with World Bank policies**

<table>
<thead>
<tr>
<th>Components</th>
<th>World Bank Standards Required</th>
<th>National Legislation</th>
<th>Measures to Address Discrepancies</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Land Acquisition and Involuntary Resettlement</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Physical and economic displacement  | Involuntary resettlement refers to both physical displacement (relocation or loss of shelter) and economic displacement (loss of assets or access to assets that leads to loss of income sources/other means of livelihood). | Mostly covered by the following legislation:  
  - **Lesotho Constitution, 1993**: Sections 36, 17(1) and 17(2) relating to right to a sustainable development and expropriation of land.  
  - **Environment Act No. 10 of 2008**: Sections 19 to 27 provides for the development, implementation and monitoring of documents such as the ESMF, ESMPs and the RAP for the protection of the citizens of Lesotho and the environment at large. It defines the ground rules for environmental management, including the requirements for ESIA and environmental audits and also provides for the implementation of the National Environmental Policy (1998) and Guidelines for Environmental Impact Assessment in Lesotho (2009) which sets out the process to be followed for the development of the ESIA.  
  - **Land Act No. 8 of 2010**: is the principal legislation governing the acquisition and compensation of  | The Compensation and Resettlement Policy Framework is consistent with World Bank OP 4.01 and OP 4.12. However, the higher standard will prevail, specifically, in accordance with World Bank policy:  
  - Economic or physical displacement is recognized for formal, traditional and informal ('illegal') owners.  
  - Compensation rates will be consistent regardless of type of ownership.  
  - Where land is impacted by project investments, land for land compensation will be preferred.  
  - Compensation related to resettlement impact is an upfront cost. Affected persons, communities and households must be compensated prior to commencement of civil works.  
  - Where economic displacement is unavoidable, the transitional support provided to re-establish or replace livelihoods must be delivered within the first years of relation to ensure timely support. |
| Resettlement Action Plan (RAP)      | Implementation of actions are to be managed through RAPs. RAPs will be developed: designed to mitigate negative impacts of displacement; identify development opportunities; include a resettlement budget and schedule; establish entitlements of all categories of affected people (including host communities). |                       |                                   |
| Minimizing adverse effects          | Where adverse environmental impacts are unavoidable, they will be minimized, with appropriate measures taken to mitigate impacts planned/implemented:  
  - Alternative project designs will be explored.  
  - Forced eviction will be avoided.  
  - Compensation will be provided for loss of assets.  
  - Disclosure of information, consultation and informed participation of those affected will take place.  
  - Livelihoods/standards of living of displaced people will be ensured/improved. |                       |                                   |
<p>| The poor and vulnerable             | Particular attention will be paid to the needs of the poor and vulnerable. |                       |                                   |</p>
<table>
<thead>
<tr>
<th>Census</th>
<th>A full census will be conducted for each project component, including appropriate baseline data of affected people to determine eligibility and discourage inflow of ineligible persons.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Compensation</td>
<td>The following minimum requirements on compensation and benefits should be adhered to:</td>
</tr>
<tr>
<td></td>
<td>• Compensation for asset loss at full replacement cost and other assistance to help improve or restore livelihoods and/or standards of living.</td>
</tr>
<tr>
<td></td>
<td>• Community engagement and consultation and informed participation of PAP in planning, implementation, and monitoring and evaluation of compensation.</td>
</tr>
<tr>
<td></td>
<td>• Transparent and consistent compensation standards.</td>
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<tr>
<td></td>
<td>• Land based compensation offered where feasible.</td>
</tr>
<tr>
<td></td>
<td>• If people are required to move: (i) offered choices in resettlement options, including adequate replacement housing with security of tenure, or (ii) cash compensation where appropriate; and (ii) provided with relocation assistance.</td>
</tr>
<tr>
<td></td>
<td>• Take possession of acquired land/related assets only after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided.</td>
</tr>
<tr>
<td></td>
<td>• All transactions, compensation, relocation activities documented.</td>
</tr>
<tr>
<td></td>
<td>• Displaced people provided with opportunities to derive appropriate development benefits from the project property for public and development purposes.</td>
</tr>
<tr>
<td></td>
<td>• <strong>Energy Policy (2015 – 2025):</strong> this framework is fundamentally meant to support energy access, within the dimensions of reliability and affordability in order to drive the economy and improve livelihoods of the people of Lesotho.</td>
</tr>
<tr>
<td></td>
<td>• <strong>Workmen’s Compensations Act (1977):</strong> This Act provides for compensation of employees who will be engaged during construction and operation of the project by the developers, its contractors and suppliers and such adherence will be mandatory.</td>
</tr>
<tr>
<td>Components</td>
<td>World Bank standards required</td>
</tr>
<tr>
<td>---------------------</td>
<td>-----------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Economic displacement</td>
<td>Those affected by economic displacement, regardless of physical displacement:</td>
</tr>
<tr>
<td></td>
<td>• Provided with adequate opportunity to re-establish their livelihoods.</td>
</tr>
<tr>
<td></td>
<td>• Compensated at full replacement cost for loss of assets/access to assets.</td>
</tr>
<tr>
<td></td>
<td>• Given opportunities to improve or at least restore means of income-earning capacity, production levels and standards of living in addition to compensation.</td>
</tr>
<tr>
<td></td>
<td>• Provided with transitional support based on a reasonable estimate of time needed to restore livelihoods.</td>
</tr>
<tr>
<td></td>
<td>• Not specifically covered by legislation.</td>
</tr>
<tr>
<td></td>
<td>• Provided with transitional support based on a reasonable estimate of time needed to restore livelihoods.</td>
</tr>
<tr>
<td>Public consultation</td>
<td>Stakeholder engagement is an ongoing process that involves: stakeholder analysis, disclosure and dissemination of information, consultation and participation.</td>
</tr>
<tr>
<td></td>
<td>• It will take place with PAP and Project Affected Communities (PAC), including host communities.</td>
</tr>
<tr>
<td></td>
<td>• It should continue throughout the planning, implementation and monitoring/evaluation of compensation payments, livelihood restoration activities, and resettlement phases.</td>
</tr>
</tbody>
</table>
| Process of consultation | In-depth informed process of consultation with PAP and PAC:  
• Begin early in the process of identification of risks/impacts and continue on an ongoing basis.  
• Base on disclosure/dissemination of relevant, transparent, objective, meaningful, easily accessible understandable information, culturally appropriate and in a local language/s.  
• Tailor to needs of disadvantaged/vulnerable groups  
• Free of external manipulation, interference, and intimidation.  
• Enable meaningful participation.  
• Capture both men's/women’s views, if necessary, through separate engagements, but reflect their different responses.  
• To lead to the views of PAP being incorporated into decision-making e.g. on proposed mitigation, development benefits/opportunities, implementation issues. |
| Disclosure of information and reporting | • Implement/maintain procedure for external communication.  
• Disclosure of information to stakeholders, in particular to PAP and PAC, on: purpose, nature, and scale of project, duration of activities, risks, impacts and mitigation measures and plans – such as the ESMP including the grievance mechanism – with summaries of key issues/commitments.  
• Documentation of process. |
| Community health, safety and security |  |
### Risks on health and safety

Assess potential risks/impacts on health/safety of PAC during the project life-cycle and establish preventative/control measures to avoid/minimize risk, consistent with human rights principles and good international industry practice.

Health issues are guided by:
- Lesotho Constitution, 1993, and its amendments (under the protection of health);
- Public Health Bill, which seeks to repeal the Public Health Order No.12 of 1970;
- Lesotho’s Health and Social Welfare Policy (2004);
- Health Sector Strategic Plan 2012/13-2016/17; and National HIV and AIDS Strategic Plan (2006 – 2011), and related guidelines such as for HIV treatment.
- The Labour Code (1992) and its amendment: Provides for the employer to ensure that employees work in safe environment and that they are provided with necessary protective clothing line with the work they perform.

Under Lesotho law, all employers have responsibilities on providing measures to prevent the spread of HIV. In regard to broad community health, safety and security, the higher standard will prevail. Specific measures will be included in contracts in regard to labour influx, gender-based violence, and HIV/AIDS. This will be addressed in the project ESMP and the ESMF.

<table>
<thead>
<tr>
<th>Communicable diseases</th>
<th>Avoid/minimize potential community exposure to diseases resulting from project activities, including communicable diseases associated with project labour.</th>
</tr>
</thead>
</table>


<table>
<thead>
<tr>
<th>Components</th>
<th>World Bank standards required</th>
<th>National legislation</th>
<th>Measures to address discrepancies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cultural heritage (as applicable to graves)</td>
<td></td>
<td>The National Heritage Resources Act (2011) provides for the preservation and protection of all heritage.</td>
<td>World Bank OP4.11 will guide project implementation in regard to cultural heritage, including provision of chance find procedures.</td>
</tr>
<tr>
<td>Protection of cultural heritage</td>
<td>In addition to complying with applicable laws, to identify/protect cultural heritage by ensuring that internationally recognized practices for protection, field-based study and documentation of cultural heritage are implemented. Where there is a chance of impacts to cultural heritage, competent professionals to assist in identification/protection of cultural heritage.</td>
<td></td>
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</tr>
<tr>
<td>Consultation of heritage</td>
<td>Where cultural heritage may be affected, consultation to take place with:</td>
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<tr>
<td></td>
<td>• PAC who use/have used the cultural heritage for long-standing cultural purposes, to identify cultural heritage and incorporate their views into the decision-making process.</td>
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<tr>
<td></td>
<td>• Relevant national/local regulatory agencies that are entrusted with the protection of cultural heritage.</td>
<td></td>
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<tr>
<td>Access</td>
<td>Where the site contains cultural heritage or prevents access to previously accessible cultural heritage sites used by PAC, to allow continued access to the cultural site, or provide an alternative access route, subject to overriding health, safety, and security considerations.</td>
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<tr>
<td>Chance finds</td>
<td>Develop provisions for managing chance finds (i.e. tangible cultural heritage encountered unexpectedly during project construction/operation) through a Chance Finds Procedure, to be applied if cultural heritage is subsequently discovered. No chance finds to be disturbed further until an assessment by competent professionals is made and actions consistent with the requirements of OP are identified.</td>
<td></td>
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<tr>
<td>Grievance mechanism</td>
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<td></td>
<td></td>
</tr>
<tr>
<td><strong>PAP and PAC grievances</strong></td>
<td><strong>Labour grievances</strong></td>
<td></td>
<td></td>
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<tr>
<td>A grievance mechanism (GM) to be established as early as possible to receive/facilitate resolution of PAP and PAC concerns/grievances about compensation/relocation, seeking to resolve concerns promptly, impartially, using an understandable/transparent consultative process that is 'culturally appropriate', readily accessible, at no cost, without retribution to the party that originated the issue/concern, and which should not impede access to judicial/administrative remedies.</td>
<td>Project workers to have access to a GM to raise workplace concerns.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PAC to be informed of the mechanism during stakeholder engagement.</td>
<td><strong>Monitoring and evaluation</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>GM to uphold and promote fundamental human rights.</td>
<td><strong>M&amp;E process</strong></td>
<td></td>
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</tbody>
</table>

Although mentioned in environmental policy/guidelines, the level of detail required is not specified and as such LEC/DoE grievance mechanism will be used.

The project will follow international good practice in regard to establishing a project grievance mechanism and build on the experience from previous WB funded projects. WB OP4.12 requires that an effective grievance mechanism be established to formalize the way grievances are accepted, assessed and effectively resolved. The project will provide accessible points where affected persons can access the grievance mechanism and provide a predictable process and timeframe for response. The project will monitor and evaluate the effectiveness of responses.

**Monitoring and evaluation**

<p>| <strong>Establish procedures to monitor/measure the effectiveness of the RAP, and compliance with related legal/contractual obligations and regulatory requirements.</strong> | Although mentioned in environmental policy/guidelines, the level of detail required is not specified. |
| <strong>Periodic review of performance to be based on systematic data collection/analysis.</strong> | <strong>The WB good practice and policy will guide the project approach to monitoring and evaluation of the ESMPs implementation and associated activities, including the GM effectiveness. Upon completion of all RAP activities and the implementation of the ESMPs, an audit will ensure that implementation was adequate, identify any remedial actions required, and provide lessons learned for future investments.</strong> |
| <strong>Document monitoring results and identify necessary corrective/preventive actions to ensure the RAP is being implemented.</strong> | <strong>Implementation of the RAP will require an external completion audit to assess performance of process.</strong> |
| <strong>Collaborate with government/third party who is responsible for managing risks/impacts and mitigation measures to implement the actions.</strong> | <strong>PAP will be consulted during the monitoring process.</strong> |
| <strong>Follow up on the actions in upcoming monitoring cycles to ensure their effectiveness.</strong> | **** |
| <strong>Implementation of the RAP will require an external completion audit to assess performance of process.</strong> | **** |
| <strong>PAP will be consulted during the monitoring process.</strong> | **** |</p>
<table>
<thead>
<tr>
<th>Component</th>
<th>World Bank standards required</th>
<th>National legislation</th>
<th>Measures to address discrepancies</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Given that the project might have significant involuntary resettlement risks, resettlement professionals will provide advice on compliance and verify the monitoring information. &lt;br&gt; • Affected PAC, external experts to be considered for participation in monitoring activities.</td>
<td>Supported by the Constitution of Lesotho, women are given equal rights through the Lesotho Gender Policy of 2003, the Legal Capacity of Married Persons Act of 2006, the Land Act of 2010, and the Decentralization Policy of 2014, and are facilitated to be able to take part in development activities.</td>
<td>The OP 4.20 gives provision for this component and the project must consider gender as part of the vulnerability profile to ensure that resettlement activities enhance gender equality. The starting point is to address any potential gender imbalance as part of the public consultation, to ensure that no critical perspectives are lost or ignored during preparation. &lt;br&gt; The ESIA for the project will provide the critical analysis related to gender issues that must be addressed and will provide further guidance and focus to ensure that the resettlement activities are conducted in a gender sensitive and inclusive manner.</td>
</tr>
</tbody>
</table>

The processes will be harmonized so that the requirements of Lesotho and the World Bank will be met with any safeguard instruments that are prepared.
CHAPTER 5 POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

This section of the ESMF identifies potential environmental and social impacts related to the proposed project activities. Potential impacts for are considered for the various project phases i.e. pre-construction, construction and Operations and Maintenance (O&M) phases. During the screening process, the significance of each impact will be classified as "significant", "moderate" or "low". This classification will inform the level of detail of the further environmental and social analysis required.

Overall, the Project will have many positive effects, which should be sustained over the long term. In general, it will help fight poverty and boost shared prosperity, as well as encourage investment in knowledge and skills in all sub-sectors of education. Promising investments will be made in regional infrastructure and economic integration, with a focus on initiatives to produce highly qualified human resources for priority growth sectors. More specifically, the project will promote awareness among all national stakeholders about the environmental and social issues of Project activities and respect for the environment and the essential principles of sustainable development. Overall, the negative or harmful environmental impacts that are likely to be generated by the Project will be limited in time and space.

5.1. Project Components Activities

Component 1 - Grid extension to Peri-Urban Areas of Lesotho

This Component will finance the design, procurement of materials and construction works required to electrify select industrial and commercial loads in peri-urban areas of Lesotho, as well as provide connections to residential customers nearby. The component will contribute towards construction of MV and LV distribution line infrastructure (33kV/11kV) as well as the upgrading of existing or construction of new substations. This will involve minimal construction such as erection of H – Pole wooden structures along the selected routes at designated intervals as illustrated in Figure 10 below. In addition, the civil construction works include the construction of control rooms (building) along with the construction of the foundations for different equipment at the substations.

However, the scale of these activities is expected to be small and the environmental impacts are expected to be minor. Nonetheless, LEC and contractors are expected to prevent pollution emanating from these activities and apply remedial measures as needed.
Typical safeguard measures for this type of infrastructure include clearing of vegetation under the power line system ROW (Right of Way) of 26m for a 33kV line as per LEC engineering manuals (Annexure 7), generation of dust, potential drainage issues, disposal of excess excavated soil materials, oversight of the health and safety aspects during construction, regular monitoring and surveillance of the power lines to check for any risk of fire or undesirable accidents and providing necessary repairs and maintenance work regarding the power lines.


Sub-component 2A will fund the rehabilitation and upgrading of Semonkong, a hydro-based mini-grid with diesel as an alternative electricity supply source. This will include rehabilitation of the turbine, expansion of generating capacity by adding 1.5 MW of solar PV and 500kWh of storage, and the upgrading of the operational mechanisms for the simultaneous production of electricity by multiple supply sources is required and will be funded by the project. In addition, the expansion of the distribution network and
connections to approximately 100 additional customers, both residential and commercial, as well as appropriate metering solutions for new and existing customers will also be funded through this sub-component.

For the Semonkong run-of-the-river hydropower mini-grid, safeguard measures should include mesh or other structures at intake to prevent aquatic biota (fish, etc.) from entering the power canal, and trash racks at the intake gate of the penstock designed to prevent any aquatic biota and other debris that may have entered the system from being sucked into the turbines. Structures should be included to prevent or reduce erosion of the natural stream banks and siltation into the intake, as well as prevent erosion from waters released through the tailrace. Measures to protect the banks with stone pitching and cement grouting should be considered. During operation, the debris from the trash racks should be separated into organic and inorganic matter, with the organic matter used for compost and the inorganic matter disposed according to arrangements set in a waste management plan.

Sub-component 2B will fund the deployment of several mini-grids using private sector-led business models and help create state-of-the-art projects using mini-grids. This component of the Project will involve new construction of small-scale solar hybrid systems, i.e. solar generation with battery storage, and diesel back-up. Mini-hydro may also be considered on a case by case basis given Lesotho’s extensive hydro potential throughout the country, possibly at 38 sites. Based on preliminary analysis, it is expected that roughly 4800 customers will be connected to mini-grids developed within this sub-component.

Construction activities will be restricted to improving road access to selected solar PV sites, removal of vegetation, installing foundations for the solar arrays, installing storage batteries (if included in the subprojects) or diesel generators and other ancillary equipment, and installing the solar arrays and controllers. Construction of the mini-grid distribution systems will involve excavating holes for placement of power poles, and possibly clearing new alignments in areas where existing roads or tracks are not available to double as the mini-grid alignment.

The main concern for the solar PV systems is the disposal of batteries. If Lead-acid batteries are used, then safety measures such as safe disposal of used batteries should be systematically planned and considered for recycling. Furthermore, surveillance of the water content in the battery should be monitored to maintain its efficiency and safety against undesirable emission of air pollutants. The DoE PIU shall set up a mechanism to take back old or non-functional lead acid batteries, including safe and sustainable means of disposal.
Diesel is a less preferred option under the project due to its environmental and health impacts, however in some circumstances it may nevertheless be an appropriate solution, particularly as part of a hybrid system. Safeguards measures such as providing grease/oil traps or containers to capture potential oil spillage from the diesel engine to avoid polluting the soil or nearby water body are to be considered during installation. During operational stage, safety equipment (such as ear plugs) should be provided for workers to mitigate the impact of noise from the engine. If noise is found to exceed 80 dB (WHO Guidelines value), soundproofing should be considered.

5.1.2. Component 3: Technical Assistance

Given that the market is very nascent, the technical assistance component will play a critical role in upstream and downstream capacity building. Sub-component 3A will provide project implementation and coordination support while sub-component 3B will fund technical assistance work for women’s employment, consumer education and citizen engagement and productive uses of energy. The scope of works for investments to be financed under the TA is yet to be defined. Therefore, the ESMF will ensure that once the scope of works has been defined, sub-project specific safeguards instruments such as ESMPs and RAPs will be prepared for those identified sub-projects in parallel with the preparation of the detailed designs.

5.1.3. Component 4: CERC

The specific activities to be financed by the funds reallocated to CERC are event and demand driven. Annex 5 of the ESMF describes additional information on the environment and social safeguard (ESS) requirements for the implementation of activities under Component 4 which can be identified and selected to provide short-term bridge financing exclusively for the immediate recovery needs related to an eligible emergency consistent with CERC’s purpose. The guidance and procedures included in this CERC ESMF should be considered in the Emergency Response Manual (ERM) that will be prepared during the project implementation, and will contain the environmental and social requirements, if the CERC is activated. The guidelines and procedures included in this ESMF CERC, Annex 5, considers the Bank’s safeguard requirement for the CERC.

5.2. ENVIRONMENTAL IMPACTS

Overall, environmental impacts for all components of the Project, including pre-construction, construction
and operation activities, are expected to be minor in magnitude, extend over a small area, be of short duration, and reversible when addressed through application of effective mitigation measures.

The following are potential environmental impacts associated with the Project:

5.2.1. Risks or negative impacts during the pre-construction phase

_During the pre-construction phase (preparation of the bidding documents)_ , the main risk is the neglect of the environmental and social aspects and their low consideration during the technical studies and / or the preparation of unsatisfactory environmental studies. This risk can be compounded if the information aspects and public participation are not taken into account.

**Key mitigation measures** for these risks will be the following: (i) public and stakeholder consultation during site selection and preparation and validation of studies; (ii) quality control and implementation of validation procedures for environmental studies and their dissemination; and (iii) regular supervision of sites by environmental experts (in addition to the control of the relevant national institutions in relation to contractual specifications).

_The effects of climate change_ will be taken into account in the choice of materials, the overall design of buildings and the technological options for construction (e.g., energy efficiency).

_Location and design_ of infrastructure should also take into account site-specific risks (such as location near sites which are prone to flooding and erosion; near water bodies and designated forests etc.).

_Sourcing of construction materials_ should be considered, especially given the risk of contractors using non-registered quarries, illegal sand-mining or creating new quarries through illegal extractions.

5.2.2. Risks or negative impacts at the construction phase

Risks and negative impacts at the construction phase will be site specific. Despite the fact that they are manageable and small, risks of this phase will have low to moderate impacts and could be a source of inconvenience for workers and all those living nearby. Of these impacts, the most important are the following:

**Air quality, noise, water and sanitation, waste**

- Pollution and nuisance (noise, dust) due to the construction of infrastructures (use of machinery and noisy equipment).
- Dust generated by excavation work, improper storage of construction materials and cuttings, and the movement of construction machinery.
- Occasional forms of pollution generated in construction sites by waste (some works could also affect the sewerage and waste disposal networks).
- Increased volumes of used oil due to certain work requiring the use of vehicles and
various Class DD hazardous waste devices - these oils include hydraulic oils, motor, gearbox and lubricating oils and insulating and heat carrying fluids.

- Impact of some works on sources of drinking water.
- Damage to some underground networks and even temporary suspension of certain services (water, electricity, etc.).
- Emissions of ozone depleting substances if air conditioners contain R22 fluid hydro-chloro-fluoro-carbons (HCFCs).
- Emissions of greenhouse gas (GHG) related to the exhaust gases of construction vehicles, as well as olfactory nuisances, health risks and pollution.

**Vegetation and soils**

- Uprooting of trees and cutting of shrubs made necessary by certain activities, with reduction of green spaces.
- Risks of localized soil degradation.
- Certain forms of soil erosion due to unreported construction activities: in particular, the artificialization of the soil could contribute to making the soil impermeable, thus limiting the infiltration of rainwater and increasing the runoff, with a saturation of the networks of sanitation.
- Risk of subsidence and landslides due to possible excavation work.
- Risks of floods, without the adoption of soil waterproofing techniques.

**Biodiversity conservation, and land use risks**

- Certain projects have raised concerns that they could threaten endangered Cape and Bearded Vulture species.
- Some utility-scale solar PV sites may compete with existing agricultural or ecologically protected land or reduce the availability of land for alternate uses.

**Hygiene, health and safety of workers and local populations**

- Accidents caused by construction machinery traffic and possible non-compliance with safety instructions.
- Safety of neighboring population due to poor organization of work sites and work areas (e.g., poor gear location, improper storage of construction materials and equipment, etc.) and no signaling of certain areas at risk (for extension work or installation of equipment).
- Accidents of workers (scaffolding falls, misuse of equipment, electrocutions, etc.).
Chemicals involved in utility-scale solar PV or solar micro grids, such as arsenic and cadmium, may be used during construction and may be harmful to local animal and human populations if not properly disposed.

**Natural risks**

Some of the proposed development could be affected by risks associated with the effects of climate change (in particular, risks associated with floods caused by heavy rains).

**Risks of conflicts between the workers and local populations**

- The works may have some risks on local population, with the likely restriction of vehicle and pedestrian traffic in the vicinity of construction sites, noise and dust-related inconvenience, space congestion caused by building materials, construction and construction waste, not to mention negative impacts due to the transformation of the landscape.

To avoid social tension, it is desirable to recruit a local workforce.

- Although it is expected that selected contractors would recruit a local workforce, it can be expected that skilled and unskilled workers may be brought in for temporary periods from outside the community. This would potentially increase risks of sexual harassment, prostitution and underage sex on vulnerable sections of the local population, especially women and minors.

**Physical cultural resources**

- Some historic and archaeological buildings may be affected by the work and some excavations may reveal archaeological and historical remains.

### 5.2.3. Risks or negative impacts during the maintenance phase

During the occupancy and maintenance phase, project activities should not pose any environmental and social problems. Potential negative impacts might generally be due to inadequate design; the lack of a system for the collection and transfer of waste, in particular solid waste; a possible lack of an effective, regulatory and adapted sanitation system; lack of regular maintenance procedures; and insufficient enforcement of security measures. All these risks can cause a malfunction or a deterioration of the works and generate certain negative impacts.

In compliance with national regulations, building companies/contractors working under the Project will be
required to regularly monitor compliance with safety and health standards, and to periodically carry out measurements, analyses and assessments of environmental conditions and, where appropriate, undertake collective or individual protection measures to prevent damage to the safety and health of workers.

**Measures mitigating the adverse impacts of the project**

Different measures will be planned to reduce the potential impacts during implementation of the various activities planned under the Project:

- Normative measures to be complied with by the sub-project promoter and its contractors (companies carrying out the works), in accordance with national regulations and World Bank OP 4.01.
- Mitigation measures to reduce potential negative environmental and social effects.

### 5.3. Social Impacts

The proposed sub-projects are expected to result in a number of positive social impacts. This could include improvements in livelihoods and economic development, improved health and education services and community safety, increased production, income generating activities, as well as improvement in women’s lives. Some positive impacts will be the direct result of project activities, while others could result from initiatives undertaken by businesses, as well as by the local residents themselves, following the improved access to electricity.

Despite these, sub-projects could pose social risks to and have adverse social impacts on local communities and households. Such adverse impacts and risks could include:

- Permanent loss of land and assets on the land such as trees and standing crops needed for the infrastructure, or temporary loss of land for construction sites, or loss of livelihoods because of limited use imposed on some lands or other resources;
- Social exclusion and negative impacts to disadvantaged and vulnerable groups, in particular due to potential exclusion from project benefits;
- The project may face an influx of non-local labour and related risks such as GBV workers’ sexual relations with minors and resulting pregnancies, presence of sex workers in the community, the spread of HIV/AIDS, sexual harassment of female employees, child labour and abuse. The project ESMP will include a GBV risk assessment and a GBV action plan.

### 5.4. Land Acquisition and Involuntary Resettlement
Land and Livelihoods: The potential impacts of sub-projects to land and livelihoods could include direct or indirect changes of land use; loss of income through temporary or permanent change in land or other resource use; and the need for land acquisition. The footprint of sub-projects is generally small, and it is not expected that people would need to relocate or resettle, although the Resettlement Policy Framework (RPF) allows for this should it be needed in exceptional cases.

The project will finance distribution networks, including expansion of existing Medium Voltage (MV) substations and construction of new MV substations, (ii) construction of new MV lines, Low Voltage (LV) lines and MV/LV transformers. These investments have a minimal footprint, normally follow existing right-of-way and have some flexibility in terms of specific location to avoid land acquisition or loss of property. However, some land acquisition or loss of assets may be needed for some subprojects, particularly in cases where new substations will be financed. Off-grid investments, such as mini-hydro systems may also have minor impacts. Since subprojects are not identified until project implementation a Resettlement Policy Framework has been prepared, providing guidance on the screening and planning process for subprojects concerning involuntary resettlement impacts.

These risks require careful consideration to improve social and environmental sustainability, resilience social cohesion. For most sub-projects, the primary potential adverse social impacts concern loss of land and livelihoods, and social exclusion of poor and other vulnerable households and groups. As much of the grid extension and mini-grids are in more remote regions of the country where most of the disadvantaged and vulnerable groups reside. The environmental and social risks of the Project and the corresponding mitigation measures are summarized in Table 5 below.
<table>
<thead>
<tr>
<th>Types of risk</th>
<th>Assessment</th>
<th>Level of risk (*)</th>
<th>Main measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Tendering process (pre-construction phase)</td>
<td>Neglecting environmental and social issues</td>
<td>Low to moderate</td>
<td>- Preparation of appropriate Terms of Reference, which will be validated by DoEnv and approved by the WB. All mitigation measures must be included into the contractor bid documents.</td>
</tr>
</tbody>
</table>
| 2. Constructions | Risks related to large deep excavations; opening of trenches for laying extension and densification pipes. | Moderate | \- Selection of specialized companies  
\- Conduct of prior technical studies.  
\- Preparation of detailed technical specifications for contractors |
| 3. Demolitions or extensions of building | Safety of workers, residents and users  
Compliance with the rules in the use of large machines for the demolition of buildings | Moderate | \- Preparation of detailed technical specifications of contractors  
\- Debris must be kept in a controlled area. Water must be sprayed to reduce dust from debris.  
\- Eliminate dust during pneumatic drilling and destruction of walls by continuous vaporization of water and / or installation of dust screens on the site  
\- Maintain the surrounding environment (sidewalks, roads) free of debris, in order to minimize the amount of dust.  
\- No open fire of construction / waste materials will be carried out on the site. |
| 4. Soils | Pollution risks or accidental soil erosion (at the site and neighborhood level) | Low | \- Conducting preliminary geotechnical studies.  
\- Anti-erosion measures |
| 5. Waters | Potential groundwater pollution and groundwater contamination (accidental spills of hydrocarbons and lubricating oils) | Low to moderate | \- Use of small structures allowing the flow of rainwater  
\- Wastewater management: Sanitary sewage disposal (or sealed and fenced pit)  
\- Quality control of drinking water  
\- Implementation of appropriate erosion and sediment control measures, such as hay bales and / or silt barriers to prevent the movement of sediments from the site and the generation of excessive turbidity in the yards. |
<table>
<thead>
<tr>
<th></th>
<th>Construction debris</th>
<th>Moderate</th>
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<tbody>
<tr>
<td>6. Debris</td>
<td>Construction debris</td>
<td>Moderate</td>
</tr>
<tr>
<td>7. Waste</td>
<td>Construction site waste (during construction) Domestic waste (during maintenance)</td>
<td>Low to moderate</td>
</tr>
<tr>
<td>8. Hazardous toxic waste (including medical waste)</td>
<td>Management of hazardous toxic waste</td>
<td>Low</td>
</tr>
</tbody>
</table>

- Correct management of debris, according to the standards established in the contractor’s ESMP-W (see Annex 7).
- Adequate storage of products and waste (waterproof storage)
- Disposal of waste to authorized public landfills.
- Hygiene in construction sites
- Prohibition of waste in the open air
- Roadways and sites for waste collection and disposal will be identified for the main types of waste typically generated by activities.
- Mineral construction and waste will be segregated from general waste, organic, liquid and chemical waste through on-site sorting and placed in appropriate containers.
- Construction waste will be collected and disposed of appropriately by licensed collectors
- Waste disposal records will be maintained as evidence for the appropriate management planned.
- Where appropriate, the contractor will reuse and recycle suitable and viable materials (with the exception of asbestos)
- All these provisions must be reported in the Contractor's ESMP-W

- Temporary on-site storage of any hazardous or toxic substances will be conducted in secure containers that provide compositional data, properties and handling information for those substances.
- Containers of hazardous substances must be placed in a leak-proof container to prevent spillage and leakage
- The waste is transported by specially authorized carriers and is disposed of at a site authorized for this purpose.
- Paints containing toxic ingredients or solvents or lead-based paints will not be used
- In accordance with national regulations, the contractor will ensure that newly constructed and / or rehabilitated health care facilities have sufficient infrastructure for the management and disposal of medical
waste; this includes and is not limited to: (i) Special facilities for separate health care waste (including "sharps instruments" for soiled instruments and human residues or liquids) from other waste disposal systems, clinical waste: yellow bags and containers; special boxes resistant to perforation; household waste (non-organic): black bags and containers (ii) appropriate storage facilities for medical waste are in place; and (iii) If the activity includes institutional treatment, appropriate elimination options should be in place.

| 9. Asbestos | Management of asbestos | Low | • If asbestos is detected at the project site, it must be clearly marked as a hazardous substance.  
• If possible, asbestos will be suitably contained and sealed to minimize exposure  
• Before removal (if such removal is necessary), asbestos will be treated with a wetting agent to minimize the amount of asbestos dust  
• Asbestos will be treated and eliminated by qualified and experienced professionals  
• If asbestos-containing materials are to be stored temporarily, the waste must be safely placed in closed containers and reported in an appropriate manner.  
• Asbestos removed will not be reused |
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<tbody>
<tr>
<td>10. GHG emissions</td>
<td>Exhaust gas</td>
<td>Low to moderate</td>
<td>Regular maintenance of construction machinery and vehicles</td>
</tr>
</tbody>
</table>
| 11. Vegetation | Some works involve the cutting or removal of vegetation (trees, shrubs) and the reduction or destruction of green spaces. | Low | • Establishment of a green zone  
• Search for alternative solutions (to avoid cutting trees)  
• Tree planting to compensate for the possible destruction of green spaces and the shortfall in terms of CO2 sequestration capacities |
| 12. Air quality | Negative potential impact of heavy machinery on construction sites and vehicles | Moderate | • Air pollution control system (compliance with standards for exhaust emissions from construction equipment (work phase).  
• Watering of construction sites;  
• Systematic removal of unused embankments |
<p>| 13. Atmospheric pollution | The sites could contribute to increase air pollution and dust generation. Increased pollution and improper storage of materials and displacement and use of materials | Low to moderate | • Adoption of strict safety standards in areas close to construction sites. • Use of techniques to mitigate this risk in construction sites • Organization of public awareness and information campaigns • Watering the building sites |
| 14. Noise pollution | Increased noise and vibration (rolling stock, jackhammers, air compressors) | Low to moderate | • Establishment of regular control measures of the intensity of noise pollution • Sound measurements according to NT 48.04 (ISO.1996 / 1) in case of complaints or perception of exceedance by controllers • Respect of working hours on construction sites • Noise from construction activities will be restricted to the schedule agreed in the permit • During operation, the engine covers of generators, air compressors and other mechanical equipment shall be closed and the equipment will be placed as far as possible from any residential area. |
| 15. Electrical disturbances | Potential electrical disturbances, initiating events, and grid protection schemes due to interconnection with the Grid. | Low | • Establishment of regular control measures. |
| 16. Health and safety of workers, residents and users | Accidents in construction sites Workers falling from scaffolding (the most common of accidents) | Moderate | • Establishment of safety rules in construction sites and application of instructions and rules of hygiene • Staff management • Helmets door by workers • Warning signs for places at risk |
| 17. Building safety | Risk of fires and explosions | Low | • Respecting national regulations (building safety and prevention of fire and explosion risks). Installation of smoke detectors, fire extinguishers and alarm devices. |</p>
<table>
<thead>
<tr>
<th>18. Traffic and pedestrian safety</th>
<th>Direct or indirect hazards to public traffic and pedestrians through construction activities</th>
<th>Low to moderate</th>
</tr>
</thead>
</table>
|                                  | • In accordance with national regulations, the contractor must ensure that the construction site is properly secured, and that traffic related to the construction is regulated. This includes, but is not limited to, signage, warning signs, gates and diversions: the site will be clearly visible, and the public warned of all potential dangers.  
• Traffic management system and staff training, particularly for site access and dense traffic near the site. Provide safe crossings and passages for pedestrians when construction traffic interferes.  
• Adjustment of working hours to local traffic patterns  
• Active management of traffic by trained and visible staff on the site, if necessary, for a safe passage and convenient for the public.  
• Provide safe and continuous access to offices, stores and residences during works. | |
| 19. Child labor                  | Use by contractors of child labor                                                                 | Low |
|                                  | • Strict compliance with national regulations on child labor by works contractors | |
| 20. Archaeological, cultural and historical heritage | Neglecting historic heritage                                                                   | Low |
|                                  | • Ensure that arrangements are in place to ensure that artefacts or other "finds" encountered during excavation or construction are noted, that officials are contacted, and that work is delayed or altered to accommodate these discoveries.  
• Compliance with national regulations for the protection of historical and cultural property. Possible involvement of the Department of Culture and specialized centers. | |
| 21. Climate change              | Line collapse due to increased wind, intense snow and frost, increased run off, extreme drought | Low – medium |
|                                  | • Develop and undertake emergency planning procedures and regular infrastructure assessments and monitoring;  
• Undertake a climate risk assessment to evaluate the risks of climate variability on transmission infrastructure;  
• Strengthen overland lines to make them better able to withstand extreme weather events. | |
<p>| 22. Vision                      | Presence of project workers, establishment of the transmission lines where they                  | Low - medium |
|                                  | • Public and worker education on how to live in the presence of the lines. | |</p>
<table>
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<tr>
<th>23. Avian collision and electrocution</th>
<th>Existence of transmission lines and solar panels along the migration route of large birds without mitigation or avoidance measures</th>
<th>Medium - high</th>
</tr>
</thead>
</table>
|                                   | • Liaise with the Bearded Vulture task team as part of avian study for guidance;  
|                                   | • Characterize the site in terms of bird diversity and abundance, through the use of walked transects and/or point counts of bird species;  
|                                   | • Determine where these species occur on site,  
|                                   | • Characterize the site in terms of bird flight behavior over and close to site;  
|                                   | • Ensuring that the bird monitoring programme is undertaken in conjunction with a suitably qualified avifaunal specialist;  
|                                   | • Aligning transmission corridors to avoid critical habitats (e.g. nesting grounds, bearded vultures foraging corridors, and migration corridors);  
|                                   | • Installing visibility enhancement objects such as marker balls, bird deterrents, or diverters |
| 24. Electromagnetic field         | Electric overhead lines are considered a source of power frequency, electric and magnetic fields which may have perceived health effect. | Low |
|                                   | • Monitor lines encroachment to stop construction of residential settlement under the transmission lines; |
| 25. Terrestrial habitat alteration| The construction of the solar panels, the terrestrial environment will be affected as some habitat of some of the fauna and flora may be disturbed | Low - Medium |
|                                   | • Avoid critical habitat through use of existing LEC and transport corridors for transmission and distribution, and existing roads and tracks for access roads, whenever possible;  
|                                   | • Avoid construction during the breeding or harvesting season |
| 26. Land use and resettlement issues | Land acquisition for grid extension and construction of mini-grids | Medium |
|                                   | • Fair compensation for affected structures crops at current market value.  
|                                   | • Ensure consultation with PAPs, obtain RoW or permit, transfer title and documentation |
| 27. Labor influx | Labour influx of unskilled labor | Medium | • Development of a detailed and site-specific labour influx management plan.  
• Recommendation of prioritizing recruitment of unskilled local labor |
| 28. Increased risk of communicable diseases (including STDs and HIV/AIDS) | Influx of additional (especially male) population can heighten the spread of HIV/AIDS and other communicable diseases | Medium | • • Awareness raising about public health impacts from labour influx. |

(*) A more specific level of risks will be established during the preparation of the ESMP of each sub-project.
CHAPTER 6 ENVIRONMENTAL AND SOCIAL SCREENING, REVIEW AND APPROVAL

Since the specific details and locations of sub-projects and activities to be financed under the project are not known at this time, the environmental and social screening process is necessary for the review and approval of various sub-projects to be funded. Therefore, while identifying and designing sub-projects under LREEAP, all possible alternatives will be examined and assessed. The DoE and LEC will collect information on the environmental and social setting; identify possible beneficiaries and assess potential environmental and social impacts of different alternatives. The general public should be made aware of the potential environmental and social impacts associated with the project activities.

6.1 Environmental and Social Screening

Each of the sub-projects to be financed under the LREEAP will be subject to an environmental and social screening process before it is selected for inclusion in the project. The screening process establishes the level of environmental and social assessment required and will apply the exclusion criteria presented in Section 1.4. The screening process intends to identify relevant possible environmental and social concerns as well as suggest any further investigation and assessment as necessary. The DoE and LEC will fill in a screening form (see Annexure1) with assistance of the consultants, if so required, for activities funded under the LREAAP. The DoE and LEC will carry out the environmental and social screening for the investments implemented under the LREEAP.

The Ministry of Energy and Meteorology (MEM) (MOH) through the Department of Energy and Lesotho Electricity Corporation DoE and LEC were identified as directly associated with the preparation, review and implementation of this ESMF

6.2 Environmental and Social Categorization of LREEAP Sub-projects

Primarily, the environmental screening exercise will be undertaken to determine the key environmental issues/concerns and the nature and magnitude of the potential impacts associated with the proposed sub-projects. The major environmental and social issues to be identified will be determined by the type, location, sensitivity and scale of the sub-project. The results/findings from this exercise are/will be used to determine:

a. Identify potential environmental or social impacts, either direct or indirect of proposed sub-projects;
b. Determine the appropriate environmental category for the project (A, B or C);
c. Based on the assessment of these impacts, determine what World Bank safeguards policies should be applied to the sub-project and any related activities;
d. Determine additional documentation needed to assure compliance with the safeguards and the level of environmental work and the type of follow-up safeguards instrument required, such as an Environmental and Social Management Plan (ESMP), Resettlement Action Plan (RAP) etc. or whether no additional environmental work is required);
e. The possibility of exclusion.

The screening result will also be an important input for analyzing the ‘feasibility’ of proposed sub-projects.

The screening aims at categorizing the project into one of the following environmental and social categories. The Environmental Officer in charge of the screening will propose the environmental category in consultation with the Social Safeguards Officer as necessary.

- Environmental Assessment (EA) Category A – LREEAP would be categorized as A if it would likely result in one or more major adverse environmental impacts. Category A projects require a full ESIA. However, the LREEAP is not expected to be a Category A project.
- EA Category B – LREEAP will be categorized as B if the potential environmental impacts identified are less severe than Category A and can be readily mitigated.
- EA Category C - C projects do not involve any civil works and have no significant environmental issues therefore; the project can proceed without reference to additional environmental requirements.

The LREEAP is an EA Category B.

6.3 Screening Process, Impact and Risk Approach

6.3.1 Environmental and Social Screening Framework in Lesotho

Screening of the sub-projects will be done based on the prevailing legal requirements to determine whether the activities are subject to, with respect to environmental issues, the sub-projects. The Kingdom

6.3.2 The Environmental and Social Screening in this Framework

Environmental and Social Screening Process outlined below complies with the Kingdom of Lesotho EIA procedures for meeting the environmental and social management requirements, as outlined in the Guidelines for Environment Impact Assessment in Lesotho (2010). The Environmental and Social Screening Process also meets the requirements of the World Bank's OP 4.01 Environmental Assessment. It provides a mechanism for ensuring that potential adverse environmental and social impacts of the LREEAP are identified, assessed and mitigated as appropriate, through an environmental and social screening process.

6.3.3 The Screening Process

The extent of environmental and social assessment that might be required prior to the commencement of sub-projects activities will depend on the outcome of the screening process described below:

**Step 1: Screening of Sub-Project Activities and Sites**

Prior to going to the field, a desk appraisal of the proposed sub-project activities and plans, including infrastructure designs where applicable, will be carried out by the DoE and LEC Environmental and Social Officers.

Subsequently, the Officers will also carry out the initial screening in the field, using the Environmental and Social Screening Form (Annexure 1).

The screening form, when currently completed, will facilitate the identification of potential environmental and social impacts, the determination of their significance, the assignment of the appropriate environmental category (consistent with the OP/BP 4.01), the determination of appropriate environmental and social mitigation measures, and the need to prepare an Environmental and Social Impacts Assessments/Environmental and Social Management Plans/Resettlement Action Plans (ESIA/ESMP/RAPs).

**Step 2: Assigning Appropriate Environmental and Social Categories**
The environmental and social screening form, when completed, will provide information on the assignment of the appropriate environmental and social category to a particular sub-project.

The DoE and LEC Environmental and Social Safeguards Officers will be responsible for assigning the appropriate environmental category to the project consistent with the requirements of OP/BP 4.01 and based on the criteria provided by the ESMF.

**Step 3: Deciding the Required Type of Environmental and Social Assessment**

After reviewing the information provided in the environmental and social screening form, and having determined the appropriate environmental category, the Department of Environment (DoEnv) will review the screening form and, if agreed, a formal approval will be issued depending on the category determined through the screening process.

**6.3.4 Use of the Environmental and Social Screening Form**

The Environmental and Social Screening Form (Annexure 1) will be completed by the Environmental and Social Safeguards Officers. In situations where the screening process identifies the need for land acquisition, loss of assets, or loss of livelihood, a RAP shall be prepared consistent with the standards and guidelines set in the Resettlement Policy Framework and the World Bank’s Involuntary Resettlement Policy, OP 4.12.

The Social Safeguards Officer will confirm that any land donation was truly voluntary and free of community pressure or coercion. Where community land was donated relevant Districts and Community Councils will confirm the land was vacant and not being utilised by any individual.

**6.3.5 Environmental and Social Impact Assessment Process**

The assessment process will identify and assess the potential environmental and social impacts of the proposed sub-projects, evaluate alternatives, as well as design and implementation of appropriate mitigation, management and monitoring measures. These measures will be captured in the project specific Environmental and Social Management Plan (ESMP) or Environmental and Social Impact Assessment (ESIA), as needed, based on the environmental screening carried out for the sub-project.
Preparation of any ESMP and ESIA will be carried out in consultation with the relevant sector Ministries, along with potentially affected persons. The Environmental and Social Safeguards Officers, in close consultation with the Department of Environment, will arrange for the following activities:

a) Preparation of the ESMP/ESIA terms of reference (see Annexure 8 for a typical ESMP template)
   • The result of identification, and extent of the ESMP/ESIA (scoping), the terms of reference will be prepared by the Environmental and Social Safeguards Officers.

b) Recruitment of an independent consultant to prepare the ESMP and/or the ESIA;

c) Preparation of the ESIA/ESMP with Public consultation. The report will follow the following format:
   • Description of the study area
   • Description of the Project
   • Discussion and evaluation of alternatives
   • Environmental description
   • Legal and regulatory
   • Identifying potential impacts of the proposed project, including cumulative impacts
   • Process of public consultations
   • Development of mitigation measures and a monitoring plan, including estimates of costs and responsibility for implementation of surveillance monitoring

d) Review of ESMP/ESIA by the Department of Environment (DoEnv);

e) Approval of the ESMP/ESIA by DoE through the Kingdom of Lesotho’s national ESIA approval process; and

f) World Bank review and Approval

6.3.6 Public Consultation
For the project public consultation will include the following steps:

• Identification of Interested and Affected Parties (I&APs), these will include:
• Communities in the project Area
• Local Authorities
• NGOs
• Stakeholders (Government departments)
• Media

• Initial step of consultation, before further environmental assessment work is undertaken; one initial meeting with each of the identified stakeholders, presenting the programme and seeking input on the scope of work for further environmental assessment work;

• Second step of consultation, after environmental assessment work is complete: presenting of the results of the environmental assessment, including presentation of identified impacts and proposed mitigations, seeking input on these proposed environmental management measures; this second step will include dissemination to identified I&APs of a summary of the environmental assessment in local language (Sesotho).

On average 3 to 5 meetings will be required for each of the above two steps of consultation for this project. The consultations will be undertaken by the LLWSSU Social Safeguards Officer. All consultation meetings will be documented.

6.3.7 Review and Recommendation for Approval/Disapproval

When the ESIA or ESMP has been prepared, DoEnv will review the reports to ensure that all environmental and social impacts have been identified and that effective mitigation measures have been proposed.

The sub-project ESMP/ESIA will be reviewed by the World Bank as follows:

• No-objection on the scope of work (Terms of Reference); and
• Review of the final ESMP/ESIA after it has been reviewed and cleared by the DoEnv.

6.4 Disclosure

In conformance with OP 4.01, project-specific ESMP/ESIA reports under EA Category B will be made available to the public as follows:

• Disclosure Notices in local newspapers with wide circulation;
• Disclosure through the World Bank Website;
A summary of the report will be available in Sesotho at the Department of Environment and the Ministry of Energy and Meteorology (MEM).

### 6.5 Rules for Civil Works Contractors

Environmental rules for civil works contractors are presented in Annexure 9. They will apply to all activities involving civil works in the LREEAP. These rules will be appended to all Request for Proposals (RFP) and bidding documents for construction works and the resulting contracts under LREAAP. Among other requirements, contractors are also expected to abide the EHS Guidelines for Electric Power Transmission and Distribution.

### 6.6 Environmental and Social Screening of Associated/Ancillary Facilities

This screening and assessment criteria for determining linkages of associated facilities to activities of component 1 and 2 of the Lesotho Renewable Energy and Energy Access Project (LREEAP) is prepared to serve as environmental and social due diligence framework. As more and specific information on subprojects’ activities becomes available and as the project moves from the framework approach to planning phase, this screening and assessment tool will be updated to reflect the reality on the ground. As stated in the Project Appraisal Document (PAD), the project development objective (PDO) is to increase access to electricity in rural and peri-urban areas of Lesotho. While advancing its PDO, the project will support four project components. Component 1 is planned to finance the design, procurement of materials and, construction works required to electrify selected industrial and commercial loads in peri-urban areas of Lesotho; and component 2 is planned to support rural mini-grids. Under component 1, it is expected that 6 new connections for economic development zones (with the potential of providing electricity to 252 companies) along with approximately 1400 residential customers nearby will be served.

The extent and relevance of the six economic development zones activities to the design or performance of components 1 and 2 are yet to be assessed and determined. Scopes and magnitudes of potential environmental and social risks and impacts, are yet to be determined and the dependencies between component 1 and 2 and that of the economic development zones activities, are to be screened.
The assessment exercise will examine relationships between the transmission and distribution grids and min-grids activities (component 1 and 2) and that of the economic development zones activities - with the objective of examining if these activities are:

a) Directly and significantly related to the LREEAP,
b) Necessary to achieve its objective as set forth in the LREEAP project document, and
c) Carried out or planned to be carried out contemporaneously with the LREEAP.

Following the assessment/review exercise, if in the judgement of the Bank it is determined that the economic development zones and the mini-grids activities are critical to the design or performance of component 1 and 2 activities and are: a) directly and significantly related to the LREEAP, b) necessary to achieve LREEAP objective as set forth in the project document, and c) carried out or planned to be carried out contemporaneously with the LREEAP, it shall be concluded that there are critical linkages/dependencies between component 1 and 2 and, the economic development zones and the mini-grids activities being assessed.

If the assessment/review exercise indicates that one or more of the criteria mentioned above are applicable to the economic development zones and mini-grids activities, the Bank team shall carry out due diligence review exercise concerning:

- Potential involuntary resettlement(s) resulting from each economic zone activity and mini-grids by obtaining information on the associated facility procedures to identify and address adverse social and environmental impacts,
- the economic zone applicable standards for assessing and mitigating potential environmental and social risks and impacts,
- the outcomes that are expected from environmental and social mitigation measures put in place, and
- Any significant environmental and social issues that need special attention and follow-up.

The Bank shall also require the GoL/LREEAP to screen specific impact zone/corridor of each industrial and economic zone (associated facility) with the objective of:

i) Ascertaining whether or not there is a direct linkage between the possible associated facility and the achievement of the project objectives as set forth in the LREEAP documents.
ii) establishing the land acquisition requirement of each economic zone and mini-grid in order to advance its social and economic objectives,
iii) determining the scope and magnitude of land acquisition impacts of each economic zone activity and mini-grids on livelihoods,

iv) informing the Bank management and fully advise the Board on resettlement and environmental issues associated with each economic zones and mini-grids activities,

v) Determining the nature and scale of the potential environmental risks and impacts;

vi) Determining the impact on the natural environment, human health and safety

If any of the economic development zone and mini-grids activities are to be built contemporaneously with the component 1 and 2 activities and if advancing these activities requires land acquisition, the Bank’s policy on involuntary resettlement (OP 4.12) shall be applicable. Resettlement planning instruments preparation and implementation related activities shall follow guidance stated under chapter five of the project’s RPF. Furthermore, the GoL/the proponent of the economic zone and mini-grids project/activities will fully comply with the policy principles and objectives as stated in OP 4.12.

vii) In accordance with the requirements of OP 4.01, Carry out an audit to assess the environmental and social performance of the ancillary/associated facilities and develop an action plan if non-compliance with the World Bank Group Operational Policies identified as pertinent to the Project is identified. GoL through MEM may need to agree with the owners of the possible associated facility (such as the industry zones and industrial facilities) on the proposed actions.

viii) The audit may include:

a. Review of various ESIA and RAP documents for infrastructure development and industrial facilities;

b. Review of existing monitoring records;

c. Conducting field visits and consultations

d.

Also, the LREAP’s component involving co-financing with other multilateral or bilateral agencies, at a minimum, OP 4.01 and OP 4.12 principles and objectives should be met by the GoL for all components, regardless of other sources of funds.
CHAPTER 7 STAKEHOLDER CONSULTATIONS AND PUBLIC DISCLOSURE

7.2 Introduction

Informing PAPs about their rights and choices is critical and key requirement of the World Bank’s Operational Policies and Lesotho regulations. This chapter will therefore detail the consultation process that has been and will be undertaken for the interested and affected parties. The purpose of the stakeholder consultation is to afford the concerned stakeholders the opportunity to contribute to both the design and implementation of the project activities and reduce the likelihood for conflicts.

Thus, prospects are created to:

- identify the views of local communities, key institutions and other stakeholders;
- obtain local and traditional knowledge that may be useful for decision-making;
- assess any mitigation measures which may be undertaken to minimize any adverse impacts of the proposed activities under the project;
- facilitate consideration of alternatives, mitigation measures and trade-offs;
- gather stakeholders’ inputs, views and concerns; and take account of the information and views of the public in the project design and in decision making;
- ensure that important impacts are not overlooked, and benefits maximized;
- reduce conflict through the early identification of contentious issues;
- provide an opportunity for the public to influence the designs and implementation in a positive manner;
- improve transparency and accountability in decision-making; and
- Enhance public confidence in the project.

Views of the project interested and affected persons have been fully taken into account during the preparation of this Environmental and Social Management Framework (ESMF). The consultations process will be an on-going activity throughout the project cycle to ensure that stakeholders are fully engaged in the Project and have the opportunity to participate in its development and implementation and understand that there is a process in place for them to submit any grievances or complaints.
7.3 Consultations

It is a requirement that appropriate mechanisms for ensuring full involvement and participation of the public is accorded priority and should be a continuous process from screening, scoping, during Environmental and Social Impact Assessment (ESIA)/Environmental Impact Assessment (EIA) Report preparation and during ESIA/EIA review and finalization.

Therefore, early and continuous stakeholder engagement is critical as it enables the communities and the potentially Project Affected Person(s) the opportunity to provide their input and feedback in order to strengthen project design, implementation and minimize negative impacts, or mitigate them where they cannot be avoided. It also facilitates by in from key stakeholders. Therefore, effective and close consultation with them is a pre-requisite for the successful running and execution of the LREEAP.

Stakeholder and citizen engagement will be built by:

- developing and implementing a comprehensive communication strategy;
- setting up effective grievance redress and beneficiary feedback mechanisms;
- ensuring an intensive program of engagement with project stakeholders;
- deploying of effective strategic communications and public education;
- deepening the consultation process which began during project preparation; and
- Monitoring social impact through annual stakeholder surveys.

LREEAP will engage with stakeholders, including communities, groups, or individuals affected by the project, and with other interested parties, though information disclosure, consultation and informed participation in a manner proportionate to the risk to and impacts on affected communities.

7.4 Summary of initial consultations

LEC and DoE have conducted preliminary consultations in Semonkong and Ha Belo community councils during the drafting of this ESMF (Table 6). The main of these meetings were to inform the affected community /urban councils of a project and the potential for resettlement especially for the mini grids and land acquisition for the grid extension. Participants to these meeting are annexed in annexure.
Table 6: Public Consultation Dates and Venues

<table>
<thead>
<tr>
<th>Proposed Location</th>
<th>Project Consulted</th>
<th>Stakeholder Consulted</th>
<th>Date</th>
<th>Venue</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ha - Belo</td>
<td>Botha – Bothe Urban Council</td>
<td>Botha – Bothe Urban Council</td>
<td>17th April 2019</td>
<td>Council Offices</td>
</tr>
<tr>
<td></td>
<td>The District Administrator (DA)</td>
<td>The District Administrator (DA)</td>
<td></td>
<td>DA’s Office</td>
</tr>
<tr>
<td>Semonkong</td>
<td>Semonkong Urban Council</td>
<td>Amohelang High School</td>
<td>9th April 2019</td>
<td>Council Offices</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>School Premises</td>
</tr>
</tbody>
</table>

In these meetings both LEC and DoE presented the objectives of the project, its scope, and the likely impacts. The consultations also gathered feedback from potential stakeholders and beneficiaries. In these meetings the community councils were informed about the project and got their views on the project as well as soliciting their buy in at this early stage. Annexure 4 and Annexure 5 presents documentation of these consultations including their respective locations and dates. These consultations were attended by local governance representative, community councilors; chiefs, representatives from the commercial sector (shop owners, retailers, accommodation establishments), school representatives including women.

In these consultations, the similar issues and concerns were raised: (i) project timelines; (ii) precaution against encroachers or opportunists on the proposed project sides; (iii) procedures for land acquisition for the proposed activities; (iv) the need to obtain land titles from respective local community councils and (v) need for employment opportunities from project affected communities. LEC and DoE responded to these concerns namely indicating that (i) the project is at its preparation stage and both LEC and DoE are fast tracking processed to meet all the requirements for the proposed project; (ii) LEC and DoE will work closely with the community councils to monitor encroachment on the proposed project sites; (iii) once the proposed sites have been agreed on the process of land surveys, valuation, and acquisition should start as early as possible, LEC has experience in land acquisition processes; (iv) LEC and DoE will continue with stakeholder consultations and work closely with local community councils for land acquisition procedures; (v) LEC’s existing operational procedure is to mandate and localize the economic benefits and will therefore prioritize recruitment of unskilled local labour.

Subsequent to the public meetings which were undertaken during the preparation of the RPF and the ESMF, there should be advertisement on notice boards of the District Administrator, the Community Council and the District Community Council offices. The notices can detail information about the project,
the contacts of the proponent, the proposed meetings and the grievance procedure. Notices should be given at least one week in advance for invitation to new meetings and consultations and local authorities (e.g. District Administrations and relevant ministries) should be informed of the meetings and given invitations to attend.

Stakeholders which may be affected by the project may include any individual or group affected by the project, that may have a significant role to play in shaping or affecting the project, be it in a positive or negative manner. PAPs are those individuals and groups who are directly affected by the project through the loss of assets, including land, or for whom the project disrupts or affects their livelihoods. Broadly, stakeholders may include:

- PAP, including PAC
- Traditional Authorities
- Local Authorities (Councils and the chiefs)
- Local Businesses
- Individuals who feel they are impacted upon (positively or negatively) by the Project or the resettlement process.

An emphasis is put on the need to consult each and every person that will be affected by the project for the reasons mentioned above and all the proceedings and concerns must be documented in the ESIA. It is important for LEC and DoE early in the project preparation stage to:

- Identify all stakeholders;
- Inform local government/authorities; village leaders, and local community organizations of the plan for, the project as soon as feasible and ask them to inform their constituents;
- Brief all project in managers and personnel who will interact on a regular basis with people affected by the project regarding the anticipated effects of the project and measures to mitigate its impact;

The LEC’s Customer Service Department, which also handles public relations and stakeholder consultation together with DoE will undertake targeted consultations and awareness campaigns to reach potential beneficiaries.

7.5 Information dissemination and disclosure

The project will comply with the Lesotho EIA regulations and the World Bank's safeguards policies on stakeholder engagement and information disclosure. Dissemination of information in the pre-construction phase and the construction phase will be primarily through alignment with the local information
dissemination process in the project area as well as the adherence to the World Bank’s operational policies.

This ESMF and the project’s RPF have been prepared in consultation with relevant stakeholders. Copies of this ESMF, the RPF and other subsequent safeguard instruments (such as ESIsAs, ESMPs) to be prepared for the project and its sub projects will be made available. The PIU will disclose the ESMF and the RPF as required by the Lesotho regulations as well as the World Bank Disclosure Policy on the World Bank’s external website. Copies of other subsequent safeguards instruments (such as ESIsAs/ESMPs) will be disclosed in like manner.

Prior to project appraisal, the ESMF document will be disclosed in the World Bank’s external website and made available to the public via LEC’s website: http://https://www.lec.co.ls. Other methods of disseminating information will be through the consultation process; radio or television programs; newspapers; and the distribution of Project Information Sheets, news updates and posters through, or displayed in, public places such as schools, health centres, and market places. The RAP, and ESMPs will assess the most effective method of information dissemination.

Information about the project will be shared with the general public and stakeholders to enable meaningful contribution into project design and implementation as well as to enhance the success of the project. The PIU will employ different communication channels such as public gatherings, public notices in community council/chief offices, place posters in strategic locations and many public places, local radio stations, newspapers using local language. The means of communication must also take into consideration the literacy levels in the rural communities by allowing enough time for responses and feedback and putting messages in local language. It is likely that project-affected parties in the communities will include vulnerable /disadvantages groups. It is inevitable that some groups of people will be negatively impacted by the project activities. The impacts will therefore need to be managed promptly to avoid unnecessary tensions and conflicts. At this stage these groups have not yet been determined, however, they will be identified after the ESIA exercise, therefore, special considerations will be made for this groups.

7.6 Grievance redress mechanism

Grievance Redress mechanism is a critical component of the project cycle as it is related to citizen feedback, incorporation of community consultation, concerns and complaints about the project's environmental and social performance and engagement especially where it is anticipated that a project’s planning, construction and operations will involve ongoing risk and adverse impacts on surrounding
communities. Thus, the project GRM will include issues related to environmental, involuntary resettlement and social issues that will arise during project implementation.

A Grievance Redress Mechanism will be implemented to ensure that all complaints from stakeholders, local communities and project affected persons are dealt with appropriately, with corrective actions being implemented, and the complainant being informed of the outcome. The GRM will accommodate all complaints from affected parties. The PIU will maintain a GRM database and log book, which will contain all the information on complaints or grievances received from the PAPs and other stakeholders. This would include: the type of complaint, location, time, the assigned officer to address the complaints, actions to address these complaints, and final outcome. The LREEAP GRM is detailed in the project’s RPF and it is also drafted to ensure that the project is proactive in terms of addressing PACs or PAPs complaints or concerns. It is important that the grievance procedure drafted is trusted and responsive to the community needs. It should be simple and easy to implement and in line with their current/local procedures such as culturally appropriate, easily accessible, affordable and transparent. The project GRM will make provisions for handling of gender-based violence and sexual exploitation issues.
7.7 Objectives of Grievance Redress

The objectives of the grievance resolution mechanism will be:

• To create a mechanism through which PAPs can communicate their dissatisfaction or grievances
• To create a mechanism through which the project will be able to accommodate all the complaints
• To create a mechanism through which the project will systematically, promptly and exhaustively respond to peoples’ concerns
• To create an avenue through which the PAPs and the project can together solve problems and handle issues arising from the project
• To create a mechanism in which the project will ensure that all complaints are promptly and adequately attended
• To create a mechanism for citizen feedback on compensation and resettlement issues as well as broader social and environmental issues emanating from the project.

7.8 DEVELOPMENT OF GRIEVANCE PROCEDURE

All communities in Lesotho already have their own community-based systems for grievance redress, which is often done through local traditional authorities such as chiefs and local community councillors. These systems have proved to be effective. It is therefore proposed that wherever possible, the project related grievances should be resolved through the existing community-based systems for grievance resolution and this will be established during the development of the ESIA. However, not all cases will be resolved within the traditional system, so other higher authorities have been proposed to follow up on the unresolved cases such as upscaling the issue to the project management unit or the formal judicial systems. The judicial system will be used as a last resort. The proposed grievance redress system will only target cases involving the project, the vulnerable groups the community cognisance of the gender issues as well. The guiding principles to be followed during grievance resolution will include but not limited to the following: fairness, accessibility, respect of human rights, compliance with national regulations, consistency with standards, equality, transparency honesty and respect for each other among others.

Any person who has been adversely affected by the project may request in writing or verbally (using the GRM form and the grievance resolution form in Annexure E) within 30 days of being informed of the decision the responsible PIU.

7.9 Process to be followed when managing a grievance

Based on the above, some procedures have been proposed. It should however be noted that his strategy can be adjusted depending on the site-specific conditions.
7.9.1 Functional Grievance Redress Committees (GRC)

Each project affected community will have a grievance redress committees (GRC) which will be composed by representatives of stakeholders affected. A functional GRC will be established in each subproject by the LREEAP PIU incorporating the use of existing local grievance redress processes available in the community and in the DoE/LEC for addressing disputes that may result from this project. The committees will be able to address people’s concerns and will be linked to the overall project to allow people to appeal upwards even to the legal courts of law. The GRC will have a set time (15 days) from receipt of the grievance to act upon it. The proposed GRC structure is as follows:

a. The Chief; Chair person
b. The Community Council Chairperson; Member
c. The Social and Environment Safeguards Officer (LREEAP PIU), Member;
d. PIU Project Manager, Member
e. The LEC Social Environment Officer, Member (For Component under LEC)
f. The DoE Social Environment Officer, Member (For Component under DoE)
g. Community Participation and Liaison Officer (CPLO), Member
h. PAPs’ representatives, Member

It is also recommended that in the formation of the GRC, the community and national bodies handling such issues be represented in the committee.

The Project Unit will ensure that the following grievance procedure is accessible to all stakeholders and project affected people, adequately registered and tracked, and resolution is affirmed as outlines in the figure below.
When one party is not satisfied with the decision at the GRC level, one can appeal to LEC/DoE. The complaints can be lodged directly to LEC/DoE, using the grievance resolution form in annexure XX. The PIU will utilise the services of an independent evaluator or monitoring team which will advise LEC/DoE on the existing policy to be implemented. This will ensure impartiality in the grievance redress system.

A PIU level GRC will also be formed comprising, in principle, of the following:

a. General Manager, Chair person
b. LEC PIU Project Manager, Member (LEC LREEAP component)
c. DoE PIU Project Manager, Member (DoE LREEAP component)
d. Legal Compliance Officer, Member
e. LREEAP Environment and Social Safeguards Officer, Member
f. Safety Health Environmental Risks and Quality Manager
g. PAPs Representative

A system of anonymous grievance reporting can also be established by allowing PAPs to complete the grievance redress form and sending it to the PIU.

### 7.3 Formal Courts

| Access | Ensure that all households in Project area understand the nature and impact of Project, including access to grievance redress and processes for resolving challenges. |
| Register | Social Safeguards Officer registers complaint and assigns a reference number (with option for complainant to remain anonymous). Social Safeguards Officer will keep a log of resolution process and provide a summary of issues to Project Manager/coordinator on a monthly basis. |
| Assess & respond | Social Safeguards Officer assesses the nature of the grievance and refer to relevant Office for mediation/resolution. Within 2 work-days of registration, Social Safeguards Officer to acknowledge known complainant with the reference number and outline the standard resolution process and timeframe. |
| Resolve | Within 14 days of registration, the Social Safeguards Officer provides the PAP with proposed resolution/mediation. Within 21 days of grievance registration, the Social Safeguards Officer completes documentation of complaint and resolution. |
| Monitor & follow-up | Within 28 days of registration, Social Safeguards Officer, or an appointed representative, meets with PAP to verify the agreed plan for resolution and assess mitigation progress. Where implementation of remedies stretch over a longer period Social Safeguards Officer will revisit regularly and upon completion of remedial measures. |
Affected party may seek legal action if grievance is still not resolved. Formal courts include magistrates, High Court of Lesotho and Supreme Court of Lesotho. These courts handle both civil and criminal cases. In regard to complaints and cases during the proposed resettlements, households with complaints bordering on compensations and criminal cases will have opportunity to take cases to these courts for review and determination on course of action. Such cases may include review of amount of compensations, cases of theft of valuable property as well as beating each other. Magistrate courts are located across the country and this would help project affected people to access the services of these magistrates in case such needs arise.

7.4 Additional GRM channels
Besides the proposed project GRM, aggrieved persons can also employ additional channels to air their complaints. These include the World Bank Grievance Redress System (GRS) and the inspection Panel:

i. The World Bank’s Grievance Redress System (GRS)
The World Bank’s Grievance Redress System (GRS) provides an additional, accessible way for individuals and communities to complain directly to the World Bank if they believe that a World Bank-financed project has or is likely to have adverse effects on them or their community. The GRS enhances the World Bank’s responsiveness and accountability by ensuring that grievances are promptly reviewed and responded to, and problems and solutions are identified by working together. The objective is to make the Bank more accessible for project affected communities and to help ensure faster and better resolution of project-related complaints. For information on how to submit complaints to the World Bank’s corporate Grievance Redress Service (GRS), affected should visit [http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service](http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service)

ii. The Inspection Panel
The Inspection Panel is an independent accountability mechanism of the World Bank. The Panel provides a forum for people who believe that they may be adversely affected by Bank-financed operations to bring their concerns to the highest decision-making levels of the World Bank. The Panel determines whether the Bank is complying with its own policies and procedures, which are designed to ensure that Bank-financed operations provide social and environmental benefits and avoid harm to people and the environment. For information on how to submit complaints to the World Bank Inspection Panel, affected persons should visit [www.inspectionpanel.org](http://www.inspectionpanel.org).
The IFC states the following as the steps to be followed when managing a grievance procedure for project similar to the LREEAP and these need to be observed during the development, implementation and monitoring of the ESIA:

a) **Publicizing Grievance Management Procedures**: Guiding principles for publicizing a project’s grievance mechanism should be in line with cultural characteristics and accessibility factors and the information to be publicised include:

   - What project-level mechanisms are (and are not) capable of delivering and what benefits complainants can receive from using the developer’s grievance mechanism, as opposed to other resolution mechanisms;
   - Who can raise complaints (affected communities);
   - Where, when, and how PAP/PAC members can file complaints;
   - Who is responsible for receiving and responding to complaints, and any external parties that can take complaints from the PAC/PAP;
   - What sort of response complainants can expect from the developer, including timing of response;
   - What other rights and protection are guaranteed.

b) **Receiving and Keeping Track of Grievances**: Once PAC/PAP are aware of the mechanism and access it to raise grievances (at all levels), the LREEA project Social Safeguards Officer will to process them. Processing includes: 1) collecting grievances; 2) recording grievances as they come in through a grievance log or a database; 3) registering them in a central place; and 4) tracking them throughout the processing cycle to reflect their status and important details. The points of access for grievances will be shared as part of consultation with all PAPs and through broader community and stakeholder consultations. The PIU’s Social Safeguards Officer will serve as the focal point for registration of any resettlement related complaints coming from each community council and oversee the process to reach resolutions.

c) **When a grievance is logged by the Officer**, the Officer will acknowledge the complaint, unless the issue is logged anonymously. If the issue is registered anonymously it will be automatically referred to the head of the Project Unit. Upon registration, the Officer will refer the issue for resolution or mediation to relevant officials. The aim is to resolve all grievances within four weeks. Any grievance which is not resolved within that timeframe will be reported in detail in monthly Project Unit report and quarterly reports to the World Bank. All other grievances will be aggregated to track trends for managerial response.
7.5 Grievance Log

The social safeguards officer will ensure that each complaint has an individual reference number, and is appropriately tracked and recorded actions are completed. The log will contain record of the person responsible for an individual complaint, and records dates for the following events:

- Date the complaint was reported;
- Date the Grievance Log was added onto the project database;
- Date information on proposed corrective action sent to complainant (if appropriate);
- The date the complaint was closed out; and
- Date response was sent to complainant.

d) Reviewing and Investigating Grievances: For a grievance mechanism to work, all complaints should be handled as promptly as possible, depending on the nature and complexity of the matter. The LREEAP Social Safeguards Officer who will be responsible for grievance handling should organize the process to validate the complaint’s legitimacy and arrange for investigation of details. The investigation team will be representatives of the GRC who will be appointed by the project coordinator based on the grievance at hand. In undertaking the investigation, the following should be considered:

- Involve senior management because extensive investigations are usually needed in more complex and severe cases, senior management should be fully informed and should assign responsibilities and time frames for handling investigations;
- Appoint the right investigation team. If an investigation team is formed internally, make sure there is no conflict of interest—that is, people investigating grievances should have no material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses;
- Develop clear tasks and responsibilities that an investigation is expected to achieve. Investigators would be expected to develop an investigation plan, assess the needs for safety and confidentiality, collect evidence, and produce an investigation report.
- Conduct meetings with complainants and visit the site. Site visits and inspections are useful for a grievance resulting from a physical incident. Gathering physical evidence of the complainant’s story may help clarify the particular circumstances of the incident.
e) Developing Resolution Options and Preparing a Response: Once the grievance is well understood, resolution options can be developed taking into consideration PAC/PAP preferences, project policy, past experience, current issues, and potential outcomes.

f) Monitoring, Reporting, and Evaluating a Grievance Mechanism: monitoring and reporting can be tools for measuring the effectiveness of the grievance mechanism and the efficient use of resources, and for determining broad trends and recurring problems so they can be resolved proactively before they become points of contention. Monitoring helps identify common or recurrent claims that may require structural solutions or a policy change, and it enables the company to capture any lessons learned in addressing grievances.
CHAPTER 8 MONITORING AND EVALUATION

8.1. OBJECTIVES OF ENVIRONMENTAL AND SOCIAL MONITORING AND CONTROL

Environmental and Social monitoring & control is a crucial component of the ESMF during project implementation. The Project Environmental and Social management Monitoring System aims to describe: (i) the elements to be monitored; (ii) monitoring methods and tools; (iii) the responsibilities for monitoring and reporting; and (iv) the periodicity of monitoring. The system aims to ensure that: identified mitigation measures are appropriate and effectively implemented and produce the anticipated results; any additional impacts not identified in the analysis of the potential environmental and social impacts of the rehabilitation and/or construction of facilities are captured as early as possible and are modified, discontinued or replaced if they prove to be inadequate.

8.2. RESPONSIBILITIES

During implementation of all subprojects, the two implementing agencies’ Safeguards Specialists will be responsible to monitor and make sure that the environmental and social mitigation/enhancement measures (including health and safety measures) outlined in the ESMP and RAP for the particular subproject are being implemented. This monitoring will concretely include: (i) the inclusion of the mitigation measures recommended in the sub-project specific safeguard instrument(s); (ii) compliance oversight during the building activities; and (iii) the monitoring of environmental and social management measures in the implementation of different activities.

The DoE PIU and LEC Technical Unit (TU) safeguards experts will be assisted by the environmental and social focal points in each district: their role will be to ensure consistent and harmonious implementation and monitoring of all the Project environmental measures.

The external environmental and social monitoring, carried out by the DoEnv at its discretion, is intended to ensure compliance with national regulations on environmental and social protection and to verify the quality of implementation of environmental protection measures.

The knowledge acquired with these two forms of environmental and social monitoring will make it possible to correct the mitigation measures and possibly to revise certain standards of environmental protection.
The environmental monitoring system (which will cover the construction phase and post-construction clean-up) must include, in particular:

- The list of all the parameters requiring environmental monitoring;
- The measures and means envisaged to protect the environment;
- An intervention mechanism in case of observation of the non-compliance with the legal and environmental requirements or the commitments of the sub-project promoters;
- The contracting parties' commitments - to submit monitoring reports (number, frequency, content).

Annual verification of the execution of the measures is intended to ensure that the environmental and social mitigation measures are implemented in accordance with the described procedures in the ESMF.

**Tracking indicators**

In order to assess the effectiveness of the sub-projects, including the construction and rehabilitation of buildings and their subsequent maintenance, the environmental and social indicators are shown in Table 7 below. Several of these indicators will be further defined in the ESMP for specific activities and will be regularly monitored during implementation of the subprojects. They will be specified in the Technical specification of the different building companies or contractors as well as those of possible subcontractors.

**Table 7: Environmental and social management monitoring indicators**

<table>
<thead>
<tr>
<th>Measure</th>
<th>Category</th>
<th>Indicator (*)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Technical measures (screening a preparation of safeguard tools)</td>
<td>ESMP</td>
<td>Number of sub-projects screened</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Number of ESMPs prepared, validated and approved</td>
</tr>
<tr>
<td>Monitoring related measures</td>
<td>Environmental monitoring and control of sub-projects</td>
<td>Number of missions completed to monitor risk mitigation measures</td>
</tr>
<tr>
<td>Sensitization</td>
<td>Raising public awareness and advocacy on the environmental, health, safety and social issues of sub-projects and good practices</td>
<td>Number of people who benefited from these sessions (with percentage of women)</td>
</tr>
<tr>
<td>Grievance management</td>
<td>Management of grievances of persons directly or indirectly affected by Project activities</td>
<td>Number of grievances received</td>
</tr>
</tbody>
</table>

(*) *All the indicators will be quantified during the forthcoming appraisal of the Project.*
8.3. MONITORING AND EVALUATION REPORTING

It is important that each and every finding of monitoring and evaluation is documented in a form of a report and submitted to the stakeholders (PAPs, PACs, WB and other relevant stakeholders) for purposes of assessing adherence to the ESMP and achievement of the project objectives. The purpose of a project monitoring and evaluation report is basically to provide information to assist stakeholders in comparing performance against plans so that current or potential problems can be identified and analyzed and to:

- Document completion of project activities;
- Identify significant deviations from plans;
- Reveal problems to appropriate stakeholders;
- Assist in corrective decision-making;
- Monitor implementation of corrective actions;
- Identify shortcomings of existing management and monitoring systems;
- Provide information for coordination of national development programmes;
- Provide reference material for planning of subsequent projects; and
- Provide information for future evaluators.

However, it should be noted that the potential limitations of project monitoring and evaluation report include the following if not undertaken correctly:

- They tend to focus on a pre-determined set of data for information.
- The attitude of the persons doing the reporting may cause them to hide problems.
- They may emphasize problems rather than opportunities.
- They may not be shared with those who provided the data.
- The information may be too subjective.

Project supervision (external and internal) is therefore very critical and it should continue for reasonable period after impact mitigation and avoidance plans and related development activities have been completed.
CHAPTER 9 IMPLEMENTATION ARRANGEMENTS FOR ESMF IMPLEMENTATION

9.1 INSTITUTIONAL ARRANGEMENTS
The project will be implemented over seven years under the Ministry of Energy and Meteorology (MEM). The MEM’s Department of Energy (DoE) will implement Components 2B, 3 and 4; LEC will implement Components 1 and 2A. As such, it is expected that the Loan Agreement will be established with the MoF and MEM, with a portion of project funds managed by the DOE for the implementation of Components 2B, 3 and 4, and the other portion being allocated to LEC per a subsidiary project agreement enabling them to implement Components 1 and 2A; a separate sub-project account will be established for LEC’s management.

A single LREEA Project Implementation Unit (PIU) (figure 11 below) located at DoE will execute project activities, and have an overall Project Coordinator (senior official from the DoE) who will be responsible for overall coordination and oversight of the Project, and consolidation of the information related to Project implementation, including, (i) definition of areas to be electrified based on technical and policy development priorities; (ii) aggregating and consolidating information from implementing entities (DoE and LEC) and broader monitoring and evaluation; and (iii) independent verification of project implementation.

LEC will be an implementing agency with autonomy to implement and provide oversight of relevant project components (Figure 11 below). This LEC Technical Unit (LEC TU) will be composed of the LEC staff already implementing an AfDB funded project and will be responsible for the implementation of grid extension (Component 1) and the rehabilitation and expansion of Semonkong (Component 2A). LEC’s extensive technical expertise in successfully implementing grid extension projects as well as donor-financed projects will allow LREEAP to capitalize on the experience accumulated to facilitate implementation and supervision of infrastructure investments of the proposed project.
9.2 ESMF IMPLEMENTATION RESPONSIBILITY

Both LREEAP PIU and LEC TU will have overall responsibility for the implementation of this ESMF as well as subsequent safeguards instruments including ESIA(s), ESMPs, and RAP(s) etc. All key project implementing entities including the LREEAP PIU, LEC TU; consultants and contractors would need to be aware of and be trained on environmental and social requirements of the project.

The PIU, using an independent agent, shall verify twice a year completed grid extensions, grid and mini-grid customer connections, and the quality of mini-grid service provision. MEM/DoE shall prepare verification reports for submission to the World Bank through the PIU. The number of actual extensions and connections will be tracked against disbursements to reduce the risk of extending the network and building mini-grids without providing actual connections.

The Project Coordinator will utilize the already established Lesotho Energy Sector Forum to report quarterly on progress under the project to the energy stakeholders. The Project Coordinator will also lead the dialogue with the other public institutions (Lesotho National Development Corporation (LNDC), Lesotho Electricity and Water Authority (LEWA)) to ensure the good coordination of activities with broader Government programs on economic growth and job creation, as well as with the enabling environment to be developed for rural electrification scale up.

Under Component 2B, the PIU will be responsible for (i) land acquisition for the construction of mini-grid sites; (ii) preparation of tender documents and management of the procurement process for mini-grid developers; (iii) coordination with LEWA to provide license exemptions to successful mini-grid developers.
and to ensure compliance with technical service standards; and (iv) monitoring mini-grid implementation to standard specifications. A transaction advisor will be hired to facilitate the preparation of the tender documents and to establish and implement the mini-grid procurement process. Under component 3, the PIU will be responsible for the provision of technical assistance and managing relevant consultancies, which include the development and execution of large-scale community awareness and citizen engagement campaign. The Community Liaison Office (CLO) will play a critical role in ensuring citizen engagement and accessible (including vulnerable groups) consultations at local level.

The PIU will be responsible for monitoring and evaluation of project implementation progress and results indicators, as well as progress toward achievement of the PDO. The collection of connection data for both the economic zones and the Semonkong mini-grid will be provided by LEC, while the collection of connection data for other mini-grid installations will be provided to the DoE by the private mini-grid developers. LEC and the private mini-grid developers will also be responsible for the submission of sex-disaggregated data, where relevant, for presenting progress in key and intermediate indicators. Within the PIU, a dedicated M&E Officer will be responsible for monitoring and evaluation and preparing monthly and quarterly progress reports for discussion by GoL technical working group and the World Bank during implementation and support missions. There will be several mid-term (in-depth) reviews of the project; the first one taking place 18 months after project effectiveness.

LEC’s Technical Unit will have its own Project Supervisor and Engineer. It will also have a Procurement Specialist, FM Specialist, Environmental and Social Specialists and CLO as well as an external specialist that will be tasked with the responsibility of providing technical and financial due diligence on the project and of evaluating proposals/applications under consideration.

A Project Steering Committee, chaired by the Principal Secretary of Energy will meet twice a year to review progress, provide policy guidance, and resolve any high-level challenges facing the project. The Committee should be comprised of MEM, DoE, LEC, LEWA, LNDC, and ministry of Finance and Ministry of Development Planning.

A number of other stakeholders including government departments and the World Bank have a role or responsibilities in the implementation of the proposed Project ESMF. These are summarized in Table 8 below.
Table 8: Other GoL Department Responsible for Implementation of the ESMF

<table>
<thead>
<tr>
<th>Institution</th>
<th>Roles and Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department of Environment</td>
<td>Department of Environment (DoEnv) will be responsible for monitoring and enforcing conditions set out in the Record of Decision (RoD) and or Environmental License issued for the project. They will also advise on the preparation of Terms of Reference (ToRs) for the required safeguards instruments and arrange for review of such instruments and stakeholder consultations. DoEnv will also be responsible for approving the ESMPs. The Department of Environment (DoEnv), on behalf of the Ministry of Tourism, Environment and Culture, plays a lead role in the implementation of the national environmental policies, legislation and regulations. Their role is to ensure that the proposed project is implemented in a sustainable manner, in compliance to the relevant environmental legislation.</td>
</tr>
<tr>
<td>Local authorities (chiefs and Urban and Community Councils)</td>
<td>They will monitor the actual work on the ground where the contractors will be working with the view to protect the communities and their resources. They are authorities in villages.</td>
</tr>
<tr>
<td>Ministry of Finance</td>
<td>Monitor the disbursements of funds to ensure the implementation of the ESMP and land compensations if necessary</td>
</tr>
</tbody>
</table>

9.3 ASSESSMENT OF INSTITUTIONAL CAPACITY TO IMPLEMENT THE ESMF

MEM through LREEAP PIU and LEC TU will have the overall responsibility to implement, monitor and report on the implementation of the ESMF. LEC TU are familiar with national environmental and social requirements. In addition, both agencies also have experience in implementing donor-financed projects will stringent environmental and social safeguards requirements (AfDB). Although LEC has experience in implementation of safeguards, they have no experience in the World Bank Safeguards Policies and do not have the capacity to manage environmental and social risks of these additional sub-project(s)/scope at the proposed scale. Thus, the project will need to support recruitment of additional E&S officers for the LEC TU to manage and monitor implementation of mitigation measures contained in the various sub-project specific safeguards instruments. Furthermore, the DOE PIU will need to engage Environmental and Social Specialists to oversee safeguards management under Components 2B, 3 and 4.

At the national level, Lesotho’s legal and institutional framework for environmental and social management is relatively good. The country has over the past years developed a legal and administrative framework to guide environmentally sustainable and socially inclusive development in various sectors of the economy. The Environment Act of 2008 is the overarching legal framework on environmental management. The aim of the Act is to promote sustainable socio-economic development in the country.
through mainstreaming of environmental and social consideration in project planning and implementation. DoEnv will also be responsible for approving the ESMPs.

**9.4 CAPACITY BUILDING**

Overall capacity for environmental and social management within the DoE PIU and LEC TU needs to be developed. Although both DoE PIU and LEC TU have some experience implementing donor funded projects (AfDB), there is limited experience in environmental and social management of World Bank safeguard policies. For these reasons, Institutional Strengthening and Implementation support together with a structured Capacity Building program are required to assist the DoE PIU and LEC TU in implementing the ESMF and providing safeguard related outcomes in a timely manner.

**9.5 Institutional Strengthening and Implementation Support**

**Target Groups for Capacity Building**

- **Safeguards Teams:** The main targets for the capacity building activities must be the safeguards teams of the LREEAP implementing agencies. They are the focus for the safeguards efforts of the project, and the other target groups will be trained and learn through (and by) the safeguards teams.

  They must become sufficiently knowledgeable of the safeguards policies to be able to screen and guide the sub-projects in identifying environmental and social risks and in the practical application of the safeguards instruments. It is not enough to know the policies and instruments; but they also need to learn how to judge where, when, and how to apply the instruments, and to guide those implementing the subprojects in identifying, planning and implementing mitigation measures. They need to know how to conduct consultations, and to train others how to conduct consultations, how to include women and vulnerable groups.

- **Other PIU and TU Units:** The safeguards teams can help build capacity of other PIU and TU units, and in particular those involved with planning, designing, supervising, and monitoring field activities, by helping those units understand the role of the safeguards in avoiding, or at least reducing problems. Work by the safeguards teams can then become integrated more easily into
the activities of the other units, such as sub-project screening and planning, field visits, monitoring, and training.

- **LEC & DoE District Officers and Engineers:** The DoE and LEC district officers and engineers have key roles throughout the sub-projects. They do the environmental and social screening or initial reviews and approval if others screen, and they do most of the monitoring of compliance with the safeguards during construction and installation works. As such, they should know the reasons for the questions being asked in the screening, understand the consultation process, and understand the issues covered in the ESMF, ESMPs, and RAPs. District level officials also need to understand the purpose and application of safeguards, as they are the direct supervisors of the district offices and also involved in the grievance redress mechanism.

- **Private Sector Participants:** For practical reasons, sub-project developers for the mini-grid systems might be responsible for screening, carrying out consultations, identifying potential environmental and social issues, proposing mitigation measures, and might be required to prepare ESMPs and RAPs with the assistance of the safeguards team. They are also responsible for compliance with the safeguards by following the conditions of the ESMPs and the other plans. They need to be trained in the use of and understand the reasons for these safeguards instruments and processes. Other contractors and private companies or social enterprises involved in the project may also be involved in screening and will certainly be responsible for compliance with the safeguards.

- **District Administrators (DAs), Community Councils and other Community Leaders:** In addition to learning through consultations about potential environmental and social impacts and their mitigation through the safeguards instruments, DAs and other community leaders from communities where additional safeguards instruments (ESMP, RAP,) will need training to understand in greater detail the contents of those plans, so they can help assure that the developers, contractors, etc., are adhering to the plans and in compliance with the safeguards.

**9.6 Institutional Strengthening**

In order to ensure that there is adequate capacity to implement and monitor the ESMF, the DoE PIU and LEC TU will need to recruit and increase environmental and social specialists respectively. The specific tasks carried out by the Environmental and Social Safeguard Staff with support from the experts will include:
• Supervise sub-projects progress as it relates to compliance with the ESMF guidelines, resolving implementation bottlenecks, and ensuring that overall project implementation proceeds smoothly;
• Preparing annual work programs and budgets linked to the implementation of ESMPs and/or with a focus on environmental and social management aspects;
• Reviewing and assessing environmental and social information relevant to the project;
• Ensuring that the implementing bodies are supported adequately and that they adhere to the principles of the project, specific to compliance with the ESMF guidelines;
• Verifying, through field trips, compliance of service providers with ESMF; and
• Responsibility for the organization and provision of training sessions, including a training plan and its modules, in environmental and social screening and environmental and social management and also involuntary resettlement safeguard policies.

9.7 Implementation Support

It is anticipated that the LEC and DoE safeguards teams will need on the job training and periodic assessment of their ability to carry out their tasks. Consultants should be engaged to provide this support, to work with the safeguards teams to ensure sound safeguard management and compliance with the requirements of the ESMF. The specifics of the consultancies will be further developed and modified during implementation as needed but it is envisioned that it will cover the following activities:

• Provide on the job training to LEC and DoE Safeguard Specialists concerning review, preparation and implementation of adequate safeguards instruments (e.g. Screening and Scoping Reports, ESMP, RAP) and their preparation;
• Work closely with the DoE PIU & LEC TU to clarify subproject cycles including safeguards requirements at each stage, from identification to operations, including rules and responsibilities, procedures, and clearances from the World Bank and the DoEnv.
• Assist the DoE PIU & LEC TU in the review and approval of subproject safeguard instruments.
• Liaise closely with the DoE PIU & LEC TU in the design and implementation of training, knowledge exchanges, and mentoring. This will include either directly providing in house training as well as drafting TOR and technical specifications to contract specific capacity building initiatives, where needed;
• Provide guidance and quality control for the reporting process during early stages of the project;
• Advise the DoE PIU & LEC TU on Stakeholder Engagement, including assessing the grievance redress mechanism, and support in the implementation of related activities;
• Support in organizing and participating in support missions, field trips, workshops; and safeguard-related activities as required by the workshops; and Safeguard-related activities as required by the DoE PIU & LEC TU.

9.8 Training Schedule

Exposure to following table 9 details the aspects that will be essential and should be covered in the training:

Table 9: Proposed training plan for the LREEAP

<table>
<thead>
<tr>
<th>Training Needs</th>
<th>Target Stakeholders</th>
<th>Time Lines</th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental &amp; Social Management Framework and related documents</td>
<td>DoE PIU &amp; LEC TU Safeguards Teams</td>
<td>Before the start of civil works</td>
</tr>
<tr>
<td>Environmental &amp; Social Safeguard Compliance</td>
<td>DoE PIU &amp; LEC TU Technical Units/Other Units</td>
<td>Throughout project implementation</td>
</tr>
<tr>
<td>Introducing Safeguard Screening Forms</td>
<td>DoE PIU &amp; LEC TU, Central and District Engineers and Officers</td>
<td>Prior to preparation of feasibility studies and the start of subproject designs</td>
</tr>
<tr>
<td>Project procedure concerning safeguards guidelines and monitoring</td>
<td>DoE PIU &amp; LEC TU, Central and District Engineers and Officers</td>
<td>Before the start of civil works and throughout project implementation</td>
</tr>
<tr>
<td>Workers’ Safety &amp; Working Conditions</td>
<td>Mini-grid developers</td>
<td>Before the start of civil works</td>
</tr>
<tr>
<td>Introducing Safeguard Training</td>
<td>Mini-grid developers</td>
<td>After the call for proposals, to understand the consultation process and how to work with villagers</td>
</tr>
<tr>
<td>Environmental and Social Safeguards Awareness Training</td>
<td>Local Government structures e.g. DAs and Community Councilors and communities</td>
<td>Before the start of civil works</td>
</tr>
<tr>
<td>Environmental &amp; Social Safeguard Compliance</td>
<td>Mini-grid developers</td>
<td>Before preparation of the feasibility studies, to understand the requirements of the ESMF, and to learn how to prepare and implement other instruments</td>
</tr>
</tbody>
</table>
The DoE PIU Safeguards Team should provide training to the contractors (in particular to the supervisors of installation) on environmental and social requirements of the project, the Environmental and Social safeguard requirements, including the workers’ code of conduct, and the grievance redress mechanism. This training should be after the contractors have been selected, but before they begin construction activities.
The budgeting for the implementation of the ESMF will be done at two levels:

- At the national level: a budget of a maximum of USD 100,000 will cover costs of technical assistance related to environmental and social assessment procedures, including various capacity building initiatives and preparation and monitoring of ESIA / ESMPs for sub-projects.

- At the district level: USD 50,000 will be earmarked for monitoring, control and evaluation and associated missions/workshops.

All costs related to environmental and social risk mitigation measures and ESMP(s) preparation and implementation costs will be considered an integral part of Project and will be included in the budgets of individual sub-projects. The cost estimates will make adequate provision for monitoring and supervision and for contingencies.
ANNEXURES

ANNEXURE 1: ENVIRONMENTAL AND SOCIAL SCREENING FORM (ESSF)

Environmental and Social Screening Form for the Screening of Potential Environmental and Social Impacts of LREEAP Activities

1. Introduction

This Environmental and Social Screening Form (ESSF) has been designed to assist in the evaluation of planned construction, rehabilitation and expansion activities under LREEAP. The form will assist in the identification of any environmental and social impacts and their mitigation measures. It will also assist in the determination of requirements for further environmental and social work as needed. The form helps to determine the characteristics of the prevailing local bio-physical and social environment with the aim of assessing the potential impacts of the construction and rehabilitation activities on the environment by the activity.

The ESSF will also assist in identifying potential socio-economic impacts that will require mitigation measures.

2. Guidelines for Screening

The evaluator should undertake the assignment after:

- Gaining adequate knowledge of baseline information of the area.
- Gaining knowledge of proposed project activities for the area.
- Having been briefed / trained in environmental and social screening.

The form is to be completed by the LEC and DoE Environmental and Social Safeguards Specialists in collaboration with DoEnv.
PART A: GENERAL INFORMATION

<table>
<thead>
<tr>
<th>Sub project Name</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Estimated Cost</td>
<td></td>
</tr>
<tr>
<td>Project Site</td>
<td></td>
</tr>
<tr>
<td>Project Objectives</td>
<td></td>
</tr>
<tr>
<td>Proposed Main Activities</td>
<td></td>
</tr>
<tr>
<td>Name of Evaluator/s</td>
<td></td>
</tr>
<tr>
<td>Date of Field Appraisal</td>
<td></td>
</tr>
</tbody>
</table>

PART B: BRIEF DESCRIPTION OF THE PROPOSED ACTIVITIES

Provide information on the type and scale of the construction/rehabilitation activity (e.g. area, land required and approximate size of structures)

Provide information on the construction activities including support/ancillary structures and activities required to build them, e.g. need to quarry or excavate borrow materials, water source, access roads, etc.

Describe how the construction/rehabilitation activities will be carried out. Include description of support/activities and resources required for the construction/rehabilitation
# PART C: ENVIRONMENTAL AND SOCIAL BASELINE INFORMATION OF THE SUB PROJECT SITE

## BRIEF DESCRIPTION

<table>
<thead>
<tr>
<th>Category of Baseline Information</th>
<th>Brief Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GEOGRAPHICAL LOCATION</strong></td>
<td></td>
</tr>
<tr>
<td>* Name of the Area (District, T/A, Village)</td>
<td></td>
</tr>
<tr>
<td>* Proposed location of the project (Include a site map of at least 1:10,000 scale/or coordinates from GPS)</td>
<td></td>
</tr>
<tr>
<td><strong>LAND RESOURCES</strong></td>
<td></td>
</tr>
<tr>
<td>* Topography and Geology of the area</td>
<td></td>
</tr>
<tr>
<td>* Soils of the area</td>
<td></td>
</tr>
<tr>
<td>* Main land uses and economic activities</td>
<td></td>
</tr>
<tr>
<td><strong>BIOLOGICAL RESOURCES</strong></td>
<td></td>
</tr>
<tr>
<td>* Flora (include threatened/endangered/endemic species)</td>
<td></td>
</tr>
<tr>
<td>* Fauna (include threatened/endangered/endemic species)</td>
<td></td>
</tr>
<tr>
<td>* Sensitive habitats including protected areas e.g. nature reserves and forest reserves</td>
<td></td>
</tr>
<tr>
<td><strong>CLIMATE</strong></td>
<td></td>
</tr>
<tr>
<td>* Temperature</td>
<td></td>
</tr>
<tr>
<td>* Rainfall</td>
<td></td>
</tr>
<tr>
<td><strong>SOCIAL</strong></td>
<td></td>
</tr>
<tr>
<td>* Number of people potentially impacted</td>
<td></td>
</tr>
<tr>
<td>* Type and magnitude of impacts (i.e. impact on land, structures, crops, standard of living)</td>
<td></td>
</tr>
<tr>
<td>* Socio-economic overview of persons impacted</td>
<td></td>
</tr>
</tbody>
</table>
PART D: SCREENING CRITERIA FOR IMPACTS DURING SUBPROJECT IMPLEMENTATION, AREAS OF IMPACTS AND IMPACTS EVALUATION AND POTENTIAL MITIGATION MEASURES

The objective of these screening criteria is to identify potential environmental and social impacts that may arise due to implementation of identified subprojects.

Screening Criteria for Social and Environmental Impacts

<table>
<thead>
<tr>
<th>Item</th>
<th>Area of Impacts</th>
<th>Impact Evaluation</th>
<th>Potential Mitigation Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Is this subproject site/activity within and/or will it affect the following environmentally sensitive areas?</td>
<td>Extent or coverage (on site, within 3-5km or beyond 5km)</td>
<td>Significance (Low, Medium, High)</td>
</tr>
<tr>
<td>No</td>
<td>Yes</td>
<td>On site</td>
<td>Within 3-5 km</td>
</tr>
</tbody>
</table>

1.0 Screening Criteria for Social and Environmental Impacts

1.1 Wetlands

1.2 Productive traditional agricultural /grazing lands

1.3 Areas with rare, endangered or
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Other Interest Flora or Fauna</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Areas with Outstanding Scenery/Tourist Site</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Within Steep Slopes</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Near Industrial Activities</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Near Human Settlements</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Near Cultural Heritage Sites</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Within Prime Surface Run Off</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Will the project discharge to or otherwise impact water bodies?</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Screening Criteria for Impacts during Implementation and Operation</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Will the implementation and operation of the subproject within the selected site generate the following externalities/costs/impacts?</strong></td>
<td></td>
</tr>
<tr>
<td>2.1</td>
<td>Soil erosion</td>
</tr>
<tr>
<td>2.2</td>
<td>Environmental degradation arising from mining of construction materials</td>
</tr>
<tr>
<td>2.3</td>
<td>Damage to wildlife species and habitat</td>
</tr>
<tr>
<td>2.4</td>
<td>Hazardous wastes, (pipes, etc.), PCB's, pollution from unspent PV batteries</td>
</tr>
<tr>
<td>2.5</td>
<td>Nuisance - smell or noise</td>
</tr>
<tr>
<td>2.6</td>
<td>Soil contamination</td>
</tr>
</tbody>
</table>

<p>| 3.0 | Screening Criteria for Social and Economic Impacts |
| 3.1 | Loss of assets, property, houses |
| 3.2 | Loss of livelihood |
| 3.3 | Disruption of social fabric |
| 3.4 | Interference in marriages for local people by workers |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>3.5</td>
<td>Spread of STIs and HIV and AIDS, due to migrant workers</td>
</tr>
<tr>
<td>3.6</td>
<td>Increased incidence of communicable diseases</td>
</tr>
<tr>
<td>3.7</td>
<td>Health hazards to workers and communities</td>
</tr>
<tr>
<td>3.8</td>
<td>Changes in human settlement patterns</td>
</tr>
<tr>
<td>3.9</td>
<td>Conflicts over use of natural resources e.g. water, land, etc.</td>
</tr>
<tr>
<td>3.10</td>
<td>Disruption of important pathways, roads</td>
</tr>
<tr>
<td>3.11</td>
<td>Increased population influx</td>
</tr>
<tr>
<td>3.12</td>
<td>Loss of cultural identity</td>
</tr>
<tr>
<td>3.14</td>
<td>Loss of income generating capacity</td>
</tr>
<tr>
<td>3.15</td>
<td>Consultation (comments from beneficiaries and</td>
</tr>
</tbody>
</table>

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>other project</td>
<td>affected peoples)</td>
<td></td>
</tr>
<tr>
<td>---------------</td>
<td>-------------------</td>
<td>---</td>
</tr>
</tbody>
</table>
PART E: SCREENING CHECKLIST FOR WORLD BANK ENVIRONMENTAL AND SOCIAL SAFEGUARDS POLICIES

The objective of this screening checklist is to identify World Bank Environmental and Social Safeguards policies which may be triggered by the implementation of identified subprojects. This will facilitate preparation of the requisite safeguard instruments such as ESIA, ESMP, RAP and ARAP.

<table>
<thead>
<tr>
<th>Questions</th>
<th>Answer</th>
<th>If Yes WB Policy triggered</th>
<th>Documents requirement if Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are the project impacts likely to have significant adverse environmental impacts that are sensitive, diverse or unprecedented? Please provide brief description:</td>
<td></td>
<td>OP 4.01 Environmental Assessment Category A</td>
<td>Environmental Impact Assessment (ESIA)</td>
</tr>
<tr>
<td>Do the impacts affect an area broader than the sites or facilities subject to physical works and are the significant adverse environmental impacts irreversible? Please provide brief description:</td>
<td></td>
<td>OP 4.01 Environmental Assessment Category A</td>
<td>ESIA</td>
</tr>
<tr>
<td>Is the proposed project likely to have minimal or no adverse environmental impacts? Please provide brief justification:</td>
<td></td>
<td>OP 4.01 Environmental Assessment Category C</td>
<td>No action needed</td>
</tr>
</tbody>
</table>

2 Examples of projects where the impacts are likely to have significant adverse environmental impacts that are sensitive, diverse or unprecedented are large scale infrastructure such as construction of new roads, railways, power plants, major urban development, water treatment, waste water treatment plants and solid waste collection and disposal etc.

3 Examples of projects likely to have minimal or no adverse environmental impacts are supply of goods and services, technical assistance, simple repair of damaged structures etc.,
<table>
<thead>
<tr>
<th>Question</th>
<th>OP 4.01 Environmental Assessment</th>
<th>ESIA or ESMP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is the project neither a Category A nor Category C as defined above?[^4]</td>
<td>Category B</td>
<td></td>
</tr>
<tr>
<td>Please provide brief justification:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Are the project impacts likely to have significant adverse Social</td>
<td></td>
<td>ESIA Social</td>
</tr>
<tr>
<td>impacts that are sensitive, diverse or unprecedented? Please provide</td>
<td></td>
<td>Assessment</td>
</tr>
<tr>
<td>brief description:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Will the project adversely impact physical cultural resources?[^5]</td>
<td></td>
<td>Addressed in</td>
</tr>
<tr>
<td>Please provide brief justification:</td>
<td></td>
<td>ESIA</td>
</tr>
<tr>
<td>Will the project involve the conversion or degradation of critical or</td>
<td></td>
<td>Addressed in</td>
</tr>
<tr>
<td>non-critical natural habitats? Please provide brief justification:</td>
<td></td>
<td>ESIA</td>
</tr>
<tr>
<td>Will the project involve the significant conversion or degradation of</td>
<td></td>
<td>No eligible</td>
</tr>
<tr>
<td>critical natural habitats?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

[^4]: Projects that do not fall either within OP 4.01 as a Category A or Category C can be considered as Category B. Examples of category B sub-projects include small scale in-situ reconstruction of infrastructure projects such as road rehabilitation and rural water supply and sanitation, small schools, rural health clinics etc.

[^5]: Examples of physical cultural resources are archaeological or historical sites, including historic urban areas, religious monuments, structures and/or cemeteries particularly sites recognized by the government.

[^6]: Critical natural habitats include those habitats that are legally protected, officially proposed for protection, identified by authoritative sources for their high conservation value, or recognized as protected by traditional local communities.
<table>
<thead>
<tr>
<th>Question</th>
<th>OP Code</th>
<th>Addressed in</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the project procure pesticides (either directly or indirectly...</td>
<td>OP4.09 Pest</td>
<td>ESIA (Pest Management Plan)</td>
</tr>
<tr>
<td>Does the sub-project involve involuntary land acquisition, loss of...</td>
<td>OP 4.12 Involuntary Resettlement</td>
<td>Resettlement Action Plan</td>
</tr>
<tr>
<td>Are there any ethnic minority communities present in the project...</td>
<td>OP 4.10 Indigenous People</td>
<td>Ethnic Minority Development Plan</td>
</tr>
<tr>
<td>Will the project have the potential to have impacts on the health...</td>
<td>OP4.36 Forestry</td>
<td>EIA</td>
</tr>
<tr>
<td>Will the project have the potential to have impacts on significant...</td>
<td>OP4.36 Forestry</td>
<td>No eligible</td>
</tr>
<tr>
<td>Will the project develop feasibility studies for projects in...</td>
<td>OP7.60 Projects in Disputed Areas</td>
<td>Governments concerned agree</td>
</tr>
<tr>
<td>Will the project involve any river, canal, lake or similar body of water that forms a boundary between, or any river or surface water that flows through two or more states? Or any tributary of above-mentioned waterways?</td>
<td><strong>OP7.50 Projects on International Waterways</strong></td>
<td>Notification (or exceptions)</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
</tbody>
</table>
| Will the project | **OP 4.37 Safety of Dams** | • Exclusion for large dams and those with special design complexities  
• For small dams, prepare generic dam safety measures |
| • Include the construction of a new dam,  
• Rely on the performance of an existing dam or dam under construction | | |
| Will the economic development zone have a critical/ significant linkage to the achievement of the LREEAP objectives? | **Associated Facility** | Due diligence report of the environment and social risks and impacts associated with the economic development zone |
Conclusion and Safeguards Instruments Required:
The project is classified as a Category ________ project as per World Bank OP4.01, and the following safeguards documents will be prepared:

1. __________________________________________
2. __________________________________________
3. __________________________________________
4. __________________________________________

<table>
<thead>
<tr>
<th>Initial Screening Completed by</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>LEC/DoE staff</td>
<td>[date]</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Confirmed by World Bank EAP Safeguards Secretariat</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Environmental Specialist</td>
<td>[date]</td>
</tr>
<tr>
<td>Social Specialist</td>
<td></td>
</tr>
<tr>
<td>Task Team Leader</td>
<td></td>
</tr>
</tbody>
</table>
ANNEXURE 2: CHANCE FIND PROCEDURES

Chance Find Procedures outline, step by step, what needs to be done when Projects come across archaeological sites, historical sites, remains and objects, including graveyards or individual graves during excavations or construction. This procedure responds to OP/BP 4.11- Physical Cultural Resources. This Policy addresses physical cultural resources which are defined as movable or immovable objects, sites, structures that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Physical cultural resources may be located in urban or rural settings and may be above or below the ground.

CHANCE FINDS PROCEDURES FOR LREEAP

If the contractor of the grid extension component discovers archaeological sites, historical sites, remains and objects, including graveyards and/or individual graves during excavations or construction, the implementers will carry out the following steps:

a. Stop the construction or excavation activities in the area of the chance find;

b. Delineate the discovered site or area;

c. Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be arranged until the responsible local authorities or the Department of Culture take over;

d. Notify the Social Safeguards Specialist of PIU or the Project Manager who in turn will notify the responsible officer in the Departments of Culture immediately (within 24 hours or less);

e. Responsible officer from the Department of Culture would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the archaeologists. The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; those include the aesthetic, historic, scientific or research, social and economic values;

f. Decisions on how to handle the finding shall be taken by the responsible authorities at the Department of Culture. This could include changes in the layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration and salvage;

g. Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the Department of Culture to DoE; and
h. Construction work could resume only after permission is given from the responsible local authorities or department responsible for culture concerning safeguard of the heritage.
I. Introduction

This document is prepared as an addendum to the existing Environmental and Social Management Framework (ESMF) of the LREEAP. It describes additional information on the environment and social safeguard (ESS) requirements for the implementation of the proposed activities to be carried out under Component 4 of the Project as described under chapter 1. The project will be implemented by the LEC and DoE, which will be supported by a PIU for each institution. Both developers will be responsible for the signing of all contracts and authorization of payments to entities contracted to implement the project, and it will be responsible for reporting to the Ministry of Finance (MoF) and financiers on project implementation status.

The guidance and procedures included in this CERC ESMF should be considered in the Emergency Response Manual (ERM) that will be prepared during the project implementation, and will contain the environmental and social requirements, if the CERC is activated. The guidelines and procedures included in this ESMF CERC Addendum takes into account the Bank’s safeguard requirement for the CERC (Bank’s Guidance on CERC, October 2017).

II. Identification of potential activities that the CERC could finance:

The activities to be carried if the CERC Component is activated include: Services, works and training as identified in Table a below:

It is important to mention that the activities that will be financed by the CERC Component, should avoid activities with complex environmental and social aspects (for example resettlement), because the CERC objective is to support immediate priority activities (less than 18 months). The activities with more environmental and social complexity, could be financed with other sources of financing.
Table a: Activities to be carried out if CERC is activated

<table>
<thead>
<tr>
<th>Services</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Technical Assistance to support strategic National electrification Planning</strong></td>
<td>for strategic electrification planning, including a National Electrification Action Plan building upon the Energy policy and implementation strategies; update of the existing Electrification Master Plan; support the LEC and DoE in policy and institutional aspects relating to electricity distribution and transmission, including detailed action plans;</td>
</tr>
<tr>
<td><strong>Technical Assistance for Capacity Building of Staff</strong></td>
<td>To improve the technical and financial data quality;</td>
</tr>
<tr>
<td></td>
<td>To assist LEC in governance and general management, staff productivity, structure and systems enhancement and development, and commercial and customer services.</td>
</tr>
<tr>
<td></td>
<td>Capacity building for the DoE and LEC (DoE and LEC) on mitigating and managing social risks related to the labour influx (sexual exploitation, gender-based violence (GBV), human trafficking, teenage pregnancies) community awareness campaign, developed to inform people in target areas of the benefits and costs of electricity services, as well as the payment mechanisms, procedures and safety practices of the electrification process</td>
</tr>
<tr>
<td><strong>Works</strong></td>
<td>Repair of damaged infrastructure including, but not limited to: existing electricity distribution and supply damaged by the project activities.</td>
</tr>
<tr>
<td></td>
<td>Refurbishment old infrastructure such as switching stations, roofing of stations, wooden poles, 132kV switching panels.</td>
</tr>
<tr>
<td><strong>Training</strong></td>
<td>Conduct necessary training related to emergency response including, but not limited to the Implementation of Emergency Action Plan (EAP).</td>
</tr>
<tr>
<td><strong>Emergency Operating Costs</strong></td>
<td>Incremental expenses by the Government for a defined period related to compensations arising as a result of the impact of an eligible emergency. This includes, but is not limited to: costs for damaged private property and temporary displacement of street vendors.</td>
</tr>
</tbody>
</table>
III. Potential Environmental and Social (ES) Impacts

Implementation of the activities will be positive and urgently needed. The proposed works and other activities (see Table a) are small-scale works. The potential negative impacts are expected to be minimal, localized, and temporary that can be mitigated through the implementation of the existing safeguards instruments of the Project and close supervision by the Project DoE and LEC. The required mitigation measures will be included as part of the Environment and Social Management Plan (ESMP) to be prepared as per the ESMF.

Contractor’s employees contracted to conduct civil or other works for contingency activities, will have to sign a worker’s code of conduct, which covers issues such as preventing gender-based violence, as well as sexual assault and abuse. In addition, construction works or uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor are prohibited.

There is a risk due to refurbishment of wooden poles which require proper handling which will be further discussed in the ESMPs.

Table b below identifies potential impacts of the proposed activities. Due consideration will be given to ensure compliance with the WB’s Environmental, Health and Safety (EHS) Guidelines (General and Specific).

<table>
<thead>
<tr>
<th>No</th>
<th>Activities</th>
<th>Potential ES impact issues (risks)</th>
<th>Expected Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Repair of damaged infrastructure including, but not limited to: existing electricity distribution and supply damaged by the project activities</td>
<td>Increase dust, noise, solid wastes, used oil/fuels, public health and safety; contractors employee health and safety</td>
<td>Moderate</td>
</tr>
<tr>
<td>2</td>
<td>Solid Waste Removal and disposal</td>
<td>Waste management and disposal</td>
<td>Minor</td>
</tr>
<tr>
<td>---</td>
<td>---------------------------------</td>
<td>---------------------------------</td>
<td>-------</td>
</tr>
<tr>
<td>3</td>
<td>Refurbishment old infrastructure such as switching stations, roofing of stations, wooden poles, 132kV switching panels</td>
<td>Solid waste generation; used oil generation; public and employee health and safety; dust; noise.</td>
<td>Moderate</td>
</tr>
</tbody>
</table>

To ensure that adverse impacts will not occur given the nature of emergency, the items and activities identified in Table c is prohibited.

**Table 3. Prohibited Activities for CERC**

<table>
<thead>
<tr>
<th>Activities of any type classifiable as Category B pursuant to the Association’s Operational Policy (OP) 4.01</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activities affecting protected areas.</td>
</tr>
<tr>
<td>Land clearance and levelling in areas that are not affected project activities.</td>
</tr>
<tr>
<td>Activities that will result in the involuntary taking of land, relocation of households, loss of assets or access to assets that leads to loss of income sources or other means of livelihoods, and interference with households’ use of land and livelihoods.</td>
</tr>
<tr>
<td>Construction works, or the uses of goods and equipment involving forced labour, child labour, or other harmful or exploitative forms of labour</td>
</tr>
<tr>
<td>Use of asbestos-based construction materials for reconstruction works</td>
</tr>
</tbody>
</table>
IV. **Environmental and Social Management Framework Process**

When the CERC component is activated, the LREEAP DoE and LEC assisted by MoF will carry out the following steps:

**Step 1: Application of the ES Screening Form.** The ESMF includes a template to screen the project from the ES point of view (Annexure 1 of this document). These forms will be used also for the CERC subprojects. The prohibited activities for CERC in Table c will also be applied. Given that the CERC objective is to support immediate priority activities (18 months), the activities or subprojects with resettlement issues will be avoided.

**Step 2: Identification of ES issues and preparation of mitigation plans.** Based on the results from Step 1, LREEAP DoE and LEC will prepare an ESMP for the CERC subprojects describing the works/activities and mitigation measures to be conducted during detailed design, bidding/contract, repair/restoration, and closure plans, taken into account the magnitude, scope, and nature of the activities. In addition to the issues identified in the Project ESMP the budget and entities responsible for implementation of the ESMP will be discussed and agreed as part of the plans.

**Step 3: WB clearance and GOL approval.** The ESMP will be cleared by WB (pre or post) as agreed as well as approved by Department of Environment (DoEnv).

**Step 4: Implementation and M&E.** The approved ESMP, will be implemented according to the agreed implementation arrangement. The LREEAP DoE and LEC and DoEnv will monitor the implementation on the ground and report the results to WB. Consultation with stakeholders will be made during the process.

**Step 5: Completion and Evaluation.** Once the CERC subproject has been completed, LREEAP DoE and LEC will monitor and evaluate the results before closing the contract. Any pending issues and/or grievance must be solved before the subproject is considered fully completed. The LREEAP DoE and LEC will submit the completion report describing the compliance of safeguard performance and submit it to WB when required.
V. Institutional Arrangement for Project Implementation

As mentioned above, LREEAP DoE and LEC will lead the implementation at project level while MoF will provide assistance.
ANNEXURE 4: PROCEEDINGS OF THE TWO PROJECTS SITES FOR THE INITIAL MEETINGS HELD

1. Semonkong
The meeting was held on the 09th April 2019 at Urban Council offices.
The following were discussed:

<table>
<thead>
<tr>
<th>Council Issues</th>
<th>LEC/DoE Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>• As a council they appreciate/happy with the proposed development. The development has come at the right time because electricity is one their greatest needs - electricity appliance, animals easily stolen due to darkness</td>
<td></td>
</tr>
<tr>
<td>o There is limited supply of electricity because it switches off at 10:00pm and therefore investors do not invest in their area as a result of this because their goods in fridges get off</td>
<td></td>
</tr>
<tr>
<td>• About 100 households to be connected is not enough due to their large population and there a number of people without electricity. Therefore request review of this number.</td>
<td></td>
</tr>
<tr>
<td>• Will the cost of connections be subsidized?</td>
<td></td>
</tr>
<tr>
<td>• We are not the first people to propose development in their areas but none have</td>
<td></td>
</tr>
<tr>
<td>• This is the initial stage</td>
<td></td>
</tr>
<tr>
<td>• It is difficult to state if the connections will be subsidized or not. Maybe the norm that is being done with the projects of this nature of standardized cost will apply. As it has been said we will not know until the project is implemented</td>
<td></td>
</tr>
<tr>
<td>• One of the councilors stated that maybe because the <em>moifo</em> include GoL officials</td>
<td></td>
</tr>
</tbody>
</table>
been implemented since 2012. Politicians have been coming here using this place for campaigns, we will watch and see if you will deliver, “rese retla boka ha lioroha”.

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>The council requested clarity if the area for solar panels have been identified.</td>
<td>There is an area identified near “Wesele church”.</td>
</tr>
<tr>
<td>They informed us the identified has some issues and therefore were advised to look for another potential sites as soon as possible because this area is in high demand for sites from people outside it. Then, the 25th April was proposed for identification of the potential site.</td>
<td></td>
</tr>
<tr>
<td>Will there be compensations?</td>
<td>Yes, where they are due, there are processes undertaken for compensations</td>
</tr>
<tr>
<td>When will the project be implemented?</td>
<td>We will know by June-July 2019 because there are some processes that are still underway. We will come back for progress after the decision has been done</td>
</tr>
<tr>
<td>Be aware of encroachment issues</td>
<td>If we work together we will overcome this issue</td>
</tr>
<tr>
<td>How dangerous are solar panels?</td>
<td>They are not dangerous, they are environment</td>
</tr>
<tr>
<td>Are solar panels resist from hail storms?</td>
<td>Some are resistant and some are not. Semonkong will be a pilot project for solar panels</td>
</tr>
<tr>
<td>Livelihoods activities currently are:</td>
<td>Noted</td>
</tr>
</tbody>
</table>
• Potato production, sheep and goats farmers (wool and mohair), rearing of pigs, chicken broilers and layers, crafts, sewing, etc.
• Tour guides, equine hire and these are organized by Semonkong lodge employing local people and hiring their horses and donkeys
• There is also 2 more accommodation facility by Serumula and Roman Catholic Mission
• There no homestays as yet

| Communication with the public is done through public gatherings |
| Semonkong has been earmarked as town but due to lack of electricity, there are no investors. It is their plea that this proposed project be implemented |

2. **Amohelang combined schools**
   - They are also happy and hop this proposal will go through and implemented. This is our greatest need as a school
   - They are currently using solar panels for lighting staff room, senior classroom and for printing and photocopying, charging of cellphones. Alternative is generator in winter and it is expensive
   - They applied for connection and quotation was M65 0000. 00 and the second time quotation was M215 000

3. **Ha Belo**
   The meeting was on the 17th April 2019, the following were discussed;

<table>
<thead>
<tr>
<th>ISSUE</th>
<th>COMMENT/RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>How are communities going to benefit from this project</td>
<td>Communities around project area will access electricity easily, there are job opportunities</td>
</tr>
<tr>
<td>Question</td>
<td>Answer</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Will there be compensations?</td>
<td>Yes, there are processes undertaken for compensations</td>
</tr>
<tr>
<td>When is the implementation?</td>
<td>We will know by June-July 2019 because there are some processes that are still underway. We will come back for progress after the decision has been done</td>
</tr>
<tr>
<td>Is this project not going to affect the load and end up with load shedding?</td>
<td>Analysis have been done and this will unlikely happen, for Butha Buthe we get electricity from ‘Muela, Eskom through Clarens and there is going to be an upgrade of Khukhune substation from 88kV to 132kV to mention a few initiatives to prevent load shedding</td>
</tr>
<tr>
<td>Their expectation is that there will be access roads to nearby communities/villages and bridges</td>
<td></td>
</tr>
<tr>
<td>- There are schools that are going to benefit, a primary school and Ha Belo High School</td>
<td></td>
</tr>
<tr>
<td>- There is also a clinic at Ha Majara which needs to be upgraded and currently some of the services are conducted at a nearby school</td>
<td></td>
</tr>
<tr>
<td>- There is construction of chicken abattoir in the vicinity of the proposed project area</td>
<td></td>
</tr>
<tr>
<td>There are two projects in a pipeline; water supply and wine production from a Mexican aloe</td>
<td></td>
</tr>
<tr>
<td>Consultation with the likely affected people is key</td>
<td>Noted, once the project has been appraised, we will come back for progress and then arrange consultations with those who are likely to be affected</td>
</tr>
</tbody>
</table>
| There is a possible encroachment, this is because there pecks that are seen in the vicinity of the proposed project | • LEC and the council will work together to ensure that it does not take place.  
• LEC was requested to submit proposed route of the electricity line so that encroachment is prevented. |
| --- | --- |
| Foreseen challenges;  
• Employment of unskilled and semi-skilled labour, it seems to a practice by most companies. There is a petition at DA’s office pertaining to this issue because LNDC has already started some excavation and this has been an issue  
• People who have been compensated usually demand that they be given job opportunities because they have been directly affected | LEC give first priority to affected community for unskilled and semi-skilled labour. And you are aware of this in our projects in the district. We also have internship/attachment programmes where your children are given experience while at school and they go to their respective districts |
| The corridor identified for electricity lines is at the fields and this is a swampy area |  |
ANNEXURE 5: SCANNED LIST OF PARTICIPANTS FOR THE TWO PROJECT AREAS.

BUTHA – BUTHE URBAN COUNCIL MEETING PARTICIPANTS

<table>
<thead>
<tr>
<th>Name</th>
<th>Designation/Position</th>
<th>Cell number</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>Molefelo Mohlaisi</td>
<td>Mayor of Butha</td>
<td>084484227A</td>
<td></td>
</tr>
<tr>
<td>Mohapi Mohapi</td>
<td>Councillor</td>
<td>587167311</td>
<td></td>
</tr>
<tr>
<td>Tlhae Rantie</td>
<td>Deputy Mayor</td>
<td>584075808</td>
<td></td>
</tr>
<tr>
<td>Tsohobo Ramapitsane</td>
<td>Councillor</td>
<td>584075808</td>
<td></td>
</tr>
<tr>
<td>Tlhae Rantie</td>
<td>Councillor</td>
<td>584075808</td>
<td></td>
</tr>
<tr>
<td>Tlhae Rantie</td>
<td>Councillor</td>
<td>584075808</td>
<td></td>
</tr>
</tbody>
</table>

Butha Buthe Urban Council meeting
Ha Bele Industrial park development
17th April 2018

Ledilo Electricity Company (Pty)Ltd
<table>
<thead>
<tr>
<th>Name</th>
<th>Designation/Position</th>
<th>Cell number</th>
<th>Signature</th>
</tr>
</thead>
</table>

**17th April 2019**

Ha Bello Industrial Park development
Butha-Buthe World Bank Consultation Meeting
Lasimo Electricity Company (Pty) Ltd
# Semonkong Urban Council Meeting Participants

**Semonkong Urban Council Meeting**

09th April 2019

<table>
<thead>
<tr>
<th>Name</th>
<th>Designation/Position</th>
<th>Cell number</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>M. Seleka Mohapi</td>
<td>Town Clerk</td>
<td>09040888</td>
<td></td>
</tr>
<tr>
<td>Motahelo Phofoi</td>
<td>APP (Physical)</td>
<td>58543199</td>
<td></td>
</tr>
<tr>
<td>Matumelo Thokoana</td>
<td>Councillor</td>
<td>57815904</td>
<td></td>
</tr>
<tr>
<td>Sello Chedane</td>
<td>Councillor</td>
<td>58931867</td>
<td></td>
</tr>
<tr>
<td>Phetse Phofoi</td>
<td>Councillor</td>
<td>57016164</td>
<td></td>
</tr>
<tr>
<td>Pakoe Pako</td>
<td>Councillor</td>
<td>55008836</td>
<td></td>
</tr>
<tr>
<td>Mosholi Letuma</td>
<td>Councillor</td>
<td>5707264</td>
<td></td>
</tr>
<tr>
<td>Kapamo Thowe</td>
<td>Councillor</td>
<td>57061555</td>
<td></td>
</tr>
<tr>
<td>Bokang Seckoe</td>
<td>Councillor</td>
<td>53992155</td>
<td></td>
</tr>
<tr>
<td>Moshii Mafapane</td>
<td>Environmental Officer</td>
<td>56688018</td>
<td></td>
</tr>
</tbody>
</table>
### AMOHELANG COMBINED SCHOOL MEETING PARTICIPANTS

**Lesotho Electricity Company (PTY) LTD**

**Semonkong World Bank Consultation Meeting**
**09th April 2019**

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
<th>Designation/Position</th>
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<th>Signature</th>
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<tr>
<td>1. Tselele, M.</td>
<td>Amohefang High</td>
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<td>2. Mothoane, J.</td>
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<td>3. Mabasa, P.</td>
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<td>4. Nkoane, T.</td>
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<td>5. Mosho, M.</td>
<td>LEC</td>
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ANNEXURE 6: CODE OF CONDUCT

Employees’ Code of Conduct
The Code of Conduct is based on International Labor Organization (ILO) and Lesotho Labor Law standards, and seeks to protect the workers who manufacture the clothing, footwear, electronics, agricultural products and other items enjoyed by consumers around the world and enforce the employees to implement.

Workplace Code of Conduct
Preamble: The Project Workplace Code of Conduct defines labor standards that aim to achieve decent and humane working conditions. The Code’s standards are based on International Labor Organization standards and internationally accepted good labor practices. Companies affiliated with the Project are expected to comply with all relevant and applicable laws and regulations of the country in which workers are employed and to implement the Workplace Code in their applicable facilities. When differences or conflicts in standards arise, affiliated companies are expected to apply the highest standard.

The PROJECT monitors compliance with the Workplace Code by carefully examining adherence to the Compliance Benchmarks and the Principles of Monitoring. The Compliance Benchmarks identify specific requirements for meeting each Code standard, while the Principles of Monitoring guide the assessment of compliance. The PROJECT expects affiliated companies to make improvements when Code standards are not met and to develop sustainable mechanisms to ensure on-going compliance.

Contractor will be responsible to provide orientation to employees and labors on the project workplace code of conduct. LREEAP will make sure that all members of the project are well informed about the project workplace.

Employment Relationship: Employers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labor and social security laws and regulations.

Non-discrimination: No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, nationality, political opinion, social group or ethnic origin.
Harassment or Abuse: Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

Forced Labour: There shall be no use of forced labour, including prison labor, indentured labour, bonded labour or other forms of forced labour.

Child Labor: No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher.

Freedom of Association and Collective Bargaining: Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.

**Health, Safety and Environment**

Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employers’ facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

Hours of Work: Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours per week. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

Compensation: Every worker has a right to compensation for a regular work week that is sufficient to meet the worker’s basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers’ basic needs and provide some discretionary income, each employer shall work with the PROJECT to take appropriate actions that seek to progressively realize a level of compensation that does.
ANNEXURE 7: LEC SERVITUDES CLEARANCE

CLEARANCES OF POWER LINES

<table>
<thead>
<tr>
<th>MAXIMUM VOLTAGE PHASE TO PHASE</th>
<th>MINIMUM CLEARANCE IN METRES</th>
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SERVITUDE CLEARANCES

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<th>MAXIMUM VOLTAGE PHASE TO PHASE</th>
<th>MINIMUM DISTANCES IN METERS FROM CENTRE CONDUCTOR</th>
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ANNEXURE 8 - TYPICAL ESMP TEMPLATE

A. Executive Summary

B. Policy, Legal and Administrative Framework
   1. Lesotho Environmental Law and Regulations
   2. Lesotho Environmental Impact Assessment Process
   3. World Bank Safeguard Policy Requirements
   4. Institutions
   5. Extent of ESMP

C. Description of the project
   1. Project Background
   2. Project Component and Activities
   3. Implementation Arrangement and Schedule
   4. Project Benefit and Justification

D. Anticipated Environmental Impacts and Mitigation Measures
   1. Impacts and Mitigation Measures Due to Pre-construction Activities
   2. Impacts and Mitigation Measures Due to Construction Activities
   3. Impacts and Mitigation Measures from Operation
   4. Impacts and Mitigation due to Decommissioning
   5. Cumulative Impacts

E. Analysis of Alternatives

F. Consultation and Information Disclosure
   1. Stakeholders/Community Consultations
   2. Information Disclosure

G. Grievance Redress Mechanism

H. Environmental and Social Management Plan
1. Environmental Management Plan
2. Social Management Plan
3. Implementation Arrangement
4. Budget and Resources

I. Conclusions and Recommendations

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<th>Environment and Social Management Plan Summary Matrix</th>
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<th>Potential impact</th>
<th>Proposed mitigation</th>
<th>Mitigation Cost</th>
<th>Institutional Responsibility</th>
<th>Implementation Schedule</th>
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ANNEXURE 9: ENVIRONMENTAL RULES FOR CIVIL WORKS CONTRACTORS
1 General Applicability of the Environmental Rules and ESMP

These general environmental guidelines apply to any work to be undertaken under the LREEAP. All work must be conducted in accordance with the World Bank Group General Guidelines for Electric Power Transmission and Distribution Environmental, Health and Safety Guidelines (EHS). The Construction and Demolition guidance in the General Guidelines is particularly pertinent. For certain work sites entailing specific environmental and/or social issues, a specific Environmental and Social Impact Assessment, including an Environmental and Social Management Plan (ESMP), has been prepared to address the above-mentioned specific issues in addition to these general environmental guidelines. In addition to these general Environmental Guidelines, the Contractor shall therefore comply with any specific ESMP for the works s/he is responsible for. The Contractor shall be informed by LREEAP about such an ESMP for certain work sites and prepare his/her work strategy and plan to fully take into account relevant provisions of that ESMP. If the Contractor fails to implement the approved ESMP after written instruction by the works supervisor to fulfill his/her obligation within the requested time, the Client reserves the right to arrange for execution of the missing action by a third party on account of the Contractor. Notwithstanding the Contractor’s obligation under the above clause, the Contractor shall implement all measures necessary to avoid undesirable adverse environmental and social impacts wherever possible, restore work sites to acceptable standards, and abide by any environmental performance requirements specified in an ESMP where such an ESMP applies. These Environmental Rules, as well as any specific ESMP, apply to the Contractor. They also apply to any sub-contractors present on Program work sites at the request of the Contractor with permission from the Client.

2 General Environmental Protection Measures

In general, environmental protection measures to be taken at any work site shall include but not be limited to:

(a) Minimize the effect of dust on the environment resulting from earth mixing sites, vibrating equipment, construction related traffic on temporary or existing access roads, etc. to ensure safety, health and the protection of workers and communities living in the vicinity of work sites and access roads.

(b) Ensure that noise levels emanating from machinery, vehicles and noisy construction activities (e.g. excavation, blasting) comply with World Bank and are generally kept at a minimum for the
safety, health and protection of workers within the vicinity of high noise levels and nearby communities.

(c) Ensure that existing water flow regimes in rivers, streams and other natural or irrigation channels are maintained and/or re-established where they are disrupted due to works being carried out.

(d) Prevent any construction-generated substance, including bitumen, oils, lubricants and waste water used or produced during the execution of works, from entering into rivers, streams, irrigation channels and other natural water bodies/reservoirs.

(e) Avoid or minimize the occurrence of standing water in holes, trenches, borrow areas, etc.

(f) Prevent and minimize the impacts of quarrying, earth borrowing, piling and building of temporary construction camps and access roads on the biophysical environment including protected areas and arable lands; local communities and their settlements. Restore/rehabilitate all sites to acceptable standards.

(g) Upon discovery of graves, cemeteries, cultural sites of any kind, including ancient heritage, relics or anything that might or believed to be of archaeological or historical importance during the execution of works, immediately report such findings to the Client so that the Ministry in charge of Culture may be expeditiously contacted for fulfilment of the measures aimed at protecting such historical or archaeological resources.

(h) Prohibit construction workers from engaging in the exploitation of natural resources such as hunting, fishing, and collection of forest products or any other activity that might have a negative impact on the social and economic welfare of the local communities. Prohibit explicitly any purchase of bush meat, as well as the transport of bush meat in Contractor’s vehicles.

(i) Prohibit the transport of firearms in Program-related vehicles.

(j) Prohibit the transport of third parties in Program-related vehicles.

(k) Implement soil erosion control measures in order to avoid surface run off and prevent siltation, etc.

(l) Ensure that garbage, sanitation and drinking water facilities are provided in construction workers camps.

(m) Ensure that, in as much as possible, local materials are from legally authorized and (insofar as can be feasibly determined) environmentally sustainable sources.

(n) Ensure public safety and meet Kingdom of Lesotho traffic safety requirements for the operation of work to avoid accidents.

(o) Ensure that any trench, pit, excavation, hole or other hazardous feature is appropriately demarcated and signposted to prevent third-party intrusion and any safety hazard to third parties.
(p) Comply with Kingdom of Lesotho speed limits, and for any traffic related with construction at Project sites.

(q) Ensure that, where unskilled daily-hired workforce is necessary, such workers are hired from neighboring communities as much as possible.

(r) Generally, comply with any requirements of Kingdom of Lesotho laws and regulations.

Besides the regular inspection of the sites by the supervisor appointed by the Client for adherence to the Contract conditions and specifications, the Client may appoint an environmental inspector to oversee the compliance with these environmental conditions and any proposed mitigation measures. State Environmental Authorities may carry out similar inspection duties. In all cases, as directed by the Client’s supervisor, the Contractor shall comply with directives from such inspectors.

Unless duly requested by the Contractor and authorized by the supervisor, no servicing of vehicles is permitted at the drilling site.

3 Pipelines

No trench shall be left open for more than 7 days, unless duly authorized by the supervisor upon Contractor’s request. Trenches and other excavation works shall be demarcated and/or signposted to avoid third party intrusion and risks of injury or death.

General conditions related with topsoil stripping, storage and restoration apply.

The Contractor will take measures to dispose of water used for pressure tests in a manner that does not affect neighboring settlements.

The Contractor will provide workers with appropriate Personal Protective gear and Equipment (PPE) especially if working with the replacement of asbestos pipelines. Recommended PPE for asbestos work includes: respirators and disposable clothing

4 Waste Management

All drums, containers, bags, etc. containing oil/fuel/surfacings materials and other hazardous chemicals shall be stored at construction sites on a sealed and/or bonded area in order to contain potential spillage. All waste containers, litter and any other waste generated during the construction shall be collected and disposed of at designated disposal sites in line with the applicable World Bank Group Environmental, Health, and Safety Guidelines as well as Kingdom of Lesotho waste management regulations.
In the event of a limited hydrocarbon spill, the Contractor will recover spilled hydrocarbons and contaminated soils in sealed drums and dispose of them in an authorized waste management facility.

All drainage and effluent from storage areas, workshops, housing quarters and generally from construction sites shall be captured and treated before being discharged into the drainage system in line with applicable government water pollution control regulations.

Used oil from maintenance shall be collected, properly stored in sealed containers, and either disposed of appropriately at designated sites or be re-cycled.

Entry of runoff into construction sites and staging areas shall be restricted by constructing diversion channels or holding structures such as berms, drains, dams, etc. to reduce the potential of soil erosion and water pollution. Construction waste shall not be left in stockpiles along the road but removed and reused or disposed of on a daily basis.

Where temporary dump sites for clean excavated material are necessary, they shall be located in areas, approved by the Client’s supervisor, where they will not result in supplemental erosion. Any compensation related with the use of such sites shall be settled prior to their use.

Areas for temporary storage of hazardous materials such as contaminated liquid and solid materials shall be approved by the supervisor and appropriate local and/or relevant national or local authorities before the commencement of work. Disposal of such waste shall be in existing, approved sites. Waste containing asbestos (old pipelines, etc.) is to be disposed of at authorized locations in a manner to discourage reuse or scavenging.

5 Quarries and Borrow Areas

The Contractor shall obtain appropriate licenses/permits from relevant authorities to operate quarries or borrow areas. The location of quarries and borrow areas shall be subject to review and approval by relevant local and national authorities.

New extraction sites:

a) Shall not be located less than 1km from settlement areas, archaeological areas, and cultural sites - including churches and cemeteries, wetlands or any other valued ecosystem component, or on high or steep ground.

b) Shall not be located in water bodies, or adjacent to them, as well as to springs, wells, well fields.

c) Shall not be located in or near forest reserves, natural habitats or national parks.
d) Shall be designed and operated in the perspective of an easy and effective rehabilitation. Areas with minimal vegetation cover such as flat and bare ground, or areas covered with grass only or covered with shrubs less than 1.5m in height, are preferred.
e) Shall have clearly demarcated and marked boundaries to minimize vegetation clearing and safety hazards for third parties.
Vegetation clearing shall be restricted to the area required for safe operation of construction work. Vegetation clearing shall not be done more than two months in advance of operations. Stockpile areas shall be in areas where trees or other natural obstacles can act as buffers to prevent dust pollution, and generally at a distance from human settlements. Wind shall be taken into consideration when siting stockpile areas. Perimeter drains shall be built around stockpile areas. The Contractor shall deposit any excess material in accordance with the principles of these guidelines, and any applicable ESMP, in areas approved by local authorities and/or the supervisor.

6 Rehabilitation of Work and Camp Sites
Topsoil shall be stripped, removed and stored for subsequent rehabilitation. Soils shall not be stripped when they are wet. Topsoil shall not be stored in large or high heaps. Low mounds of no more than 1 to 2m high are recommended.
Generally, rehabilitation of work and camp sites shall follow the following principles:
- To the extent practicable, reinstate natural drainage patterns where they have been altered or impaired.
- Remove toxic materials and dispose of them in designated sites. Backfill excavated areas with soils or overburden that is free of foreign material that could pollute groundwater and soil.
- Ensure reshaped land is formed so as to be stable, adequately drained and suitable for the desired long-term land use and allow natural regeneration of vegetation.
- Minimize erosion by wind and water both during and after the process of reinstatement.
- Compacted surfaces shall be deep ripped to relieve compaction unless subsurface conditions dictate otherwise.

7 Management of Water needed for Construction Purposes

The Contractor shall at all costs avoid conflicting with water needs of local communities. To this effect, any temporary water abstraction for construction needs from either ground or surface water shall be submitted to the following community consultation process:

- Identification of water uses that may be affected by the planned water abstraction,
• Consultation with all identified groups of users about the planned water abstraction,
• In the event that a potential conflict is identified, report to the supervising authority.

This consultation process shall be documented by the Contractor (via minutes of meeting) for review and eventual authorization of the water withdrawal by the Supervising Engineer.

Abstraction of both surface and underground water shall only be done with the consultation of the local community as mentioned and after obtaining a permit from the relevant authority.

Abstraction of water from dambos, marshes, and similar wetlands is prohibited.

Temporary damming of streams and rivers is submitted for the Supervising Engineer’s approval by the. It shall be done in such a way as to avoid disrupting water supplies to communities downstream, and to maintain the ecological balance of the river system.

No construction water containing spoils or site effluent, especially cement and oil, shall be allowed to flow into natural water drainage courses. Similarly, wash water from washing out of equipment shall not be discharged into water courses or road drains. Washing bays shall be sited accordingly. Unless site conditions are not favourable, it will generally be infiltrated through soak pits or similar means.

Site spoils and temporary stockpiles shall be located away from the drainage system, and surface run off shall be directed away from stockpiles to prevent erosion.

8 Traffic Management and Community Safety

Location of temporary access roads shall be done in consultation with the local community and based on the screening results, especially in important or sensitive environments. Temporary access roads shall not traverse wetland areas or other ecologically sensitive areas. The construction of any access roads shall be submitted to a prior consultation process with potentially affected communities that will be documented (minutes of meetings) for the Supervising Engineer’s review and approval.

Upon the completion of civil works, all temporary access roads shall be ripped and rehabilitated. Measures shall be taken to suppress dust emissions generated by Program traffic.
Maximum speed limits for any traffic related with construction at LREEAP sites shall be the following.

- Inhabited areas: 50 km/h
- Open road: 80 km/h.

9 Salvaging and Disposal of Obsolete Components found by Rehabilitation Works

Obsolete materials and construction elements such as electro-mechanical equipment, pipes, accessories and demolished structures shall be salvaged and disposed of in a manner approved by the supervisor. The Contractor has to agree with the supervisor which elements are to be surrendered to the Client’s premises, which will be recycled or reused, and which will be disposed of at approved landfill sites.

Any asbestos cement material that might be uncovered when performing rehabilitation works will be considered as hazardous material and disposed of in a designated facility. Scavenging and reuse of such materials must be prohibited.

10 Compensation of Damage to Property

Compensation of land acquired permanently for Program purposes will be handled under Client responsibility based on the provisions of the RPF. However, in the event that the Contractor, deliberately or accidentally, damages property, he shall repair the property to the owner’s satisfaction and at his own cost. For each repair, the Contractor shall obtain from the owner/user a certificate that the damage has been made good satisfactorily in order to indemnify the Client from subsequent claims.

In any case where compensation for inconveniences, damage of crops etc. are claimed by the owner, the Client has to be informed by the Contractor through the Supervising Engineer.

11 Contractor’s Health, Safety and Environment Management Plan (HSE-MP)

Within 6 weeks of signing the Contract, the Contractor shall prepare an HSE-MP to ensure the adequate management of the health, safety, environmental and social aspects of the works,
including implementation of the requirements of these general conditions and any specific requirements of an ESMP for the works. The Contractor’s EHS-MP will serve two main purposes:

The Contractor’s HSE-MP shall provide at least:

- A description of procedures and methods for complying with these general environmental management conditions, and any specific conditions specified in an ESMP;
- A description of specific mitigation measures that will be implemented in order to minimize adverse impacts;
- A description of all planned monitoring activities and the reporting thereof; and
- The internal organizational, management and reporting mechanisms put in place for such.

The Contractor’s HSE-MP will be reviewed and approved by the Client before start of the works. This review should demonstrate if the Contractor’s HSE-MP covers all of the identified impacts, and has defined appropriate measures to counteract any potential impacts.

12 HSE Reporting

The Contractor shall prepare bi-monthly progress reports to the Client (PIU, DOE & LEC or DoE) on compliance with these general conditions, the sub-program ESMP if any, and his own HSE-MP. The Contractor’s reports will include information on:

- HSE management actions/measures taken, including approvals sought from local or national authorities;
- Problems encountered in relation to HSE aspects (incidents, including delays, cost consequences, etc. as a result thereof);
- Non-compliance with contract requirements on the part of the Contractor;
- Changes of assumptions, conditions, measures, designs and actual works in relation to HSE aspects; and
- Observations, concerns raised and/or decisions taken with regard to HSE management during site meetings

The reporting of any significant HSE incidents shall be done as soon as practicable. Such incident reporting shall therefore be done individually. The Contractor should keep his own records on health, safety and welfare of persons, and damage to property. It is advisable to
include such records, as well as copies of incident reports, as appendixes to the bi-monthly reports. Details of HSE performance will be reported to the Client.

13 Training of Contractor’s Personnel

The Contractor shall provide sufficient training to his own personnel to ensure that they are all aware of the relevant aspects of these general conditions, any program ESMP, and his own HSEMP, and are able to fulfill their expected roles and functions. Specific training will be provided to those employees that have particular responsibilities associated with the implementation of the HSE-MP. Training activities will be documented for potential review by the Client.

Amongst other issues, training will include an awareness session for all employees on HIV/AIDS addressing the following topics:

• What is HIV/AIDS?
• How is HIV/AIDS contracted?
• HIV/AIDS prevention.

14 Penalties for Non-Compliance

In the HSE-MP, the Contractor shall specify strict penalties (warnings, dismissal, etc.) and transparent enforcement procedures for non-compliance by any employees or contracted personnel. The Supervising Engineer shall oversee the Contractor’s timely and appropriate application of these procedures during project construction.

Any material (non-trivial) environmental or social damages by the Contractor due to noncompliance with these Rules must be rectified before the Contractor will be eligible to receive his final payment.
REFERENCES

3. IFC Good Practice Note Addressing Grievances from Project-Affected Communities (2009).
4. Lesotho Data Portal
5. Lesotho Rural Livelihood Baseline Profile (2012)
10. World Bank Study
12. www.wikipedia.org