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Report No: PAD4665

INTERNATIONAL DEVELOPMENT ASSOCIATION

PROJECT APPRAISAL DOCUMENT  
ON A  
PROPOSED GRANT

IN THE AMOUNT OF SDR 30.6 MILLION  
(US\$41.1 MILLION EQUIVALENT)

TO THE

REPUBLIC OF SIERRA LEONE

FOR A

SIERRA LEONE LAND ADMINISTRATION PROJECT

May 09, 2022

Urban, Disaster Risk Management, Resilience and Land Global Practice  
Western and Central Africa Region

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## CURRENCY EQUIVALENTS

(Exchange Rate Effective April 30, 2022)

Currency Unit = Special Drawing Rights (SDR)

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SDR 0.74388157 = US\$1

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## FISCAL YEAR

January 1 - December 31

Regional Vice President: Ousmane Diagana

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## ABBREVIATIONS AND ACRONYMS

ADR	Alternative Dispute Resolution
AMP	Asbestos Management Plan
ASSL	Audit Service Sierra Leone
AWPB	Annual Work Plan and Budget
CERC	Contingent Emergency Response Component
CLRB	Customary Land Rights Bill
CORS	Continuously Operating Reference Station
COVID-19	Coronavirus Disease 2019
CPF	Country Partnership Framework
CSO	Civil Society Organization
E&S	Environmental and Social
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FCC	Freetown City Council
FM	Financial Management
GBV	Gender Based Violence
GoSL	Government of Sierra Leone
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IBRD	International Bank for Reconstruction and Development
ICT	Information and Communication Technology
IDA	International Development Association
IFR	Interim Financial Report
IMTF	Inter-Ministerial Task Force
IPF	Investment Project Financing
IPR	Independent Post Review
IRR	Investment Rate of Return
ITRF	International Terrestrial Reference Frame
LIS	Land Information System
LMP	Labor Management Procedure
MAF	Ministry of Agriculture and Forestry
M&E	Monitoring and Evaluation
MLHCP	Ministry of Lands, Housing and Country Planning
MOF	Ministry of Finance
NDC	Nationally Determined Contributions
NDMA	National Disaster Management Agency
NLC	National Lands Commission
NLCB	National Land Commission Bill
NLP	National Land Policy
NPV	Net Present Value

OARG	Office of the Administrator and Registrar General
PCU	Project Coordination Unit
PDO	Project Development Objective
PFM	Public Financial Management
PFMU	Public Financial Management Unit
PIM	Project Implementation Manual
PPA	Project Preparation Advance
PPSD	Project Procurement Strategy Document
PPR	Procurement Post Review
PSC	Project Steering Committee
RPF	Resettlement Policy Framework
SDR	Special Drawing Rights
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SPD	Standard Procurement Document
STEP	Systematic Tracking of Exchanges in Procurement
SW	Staff week
TOR	Terms of Reference
TTL	Task Team Leader
TWG	Technical Working Group
UNFAO	Food and Agriculture Organization of the United Nations
UN Women	United Nations Entity for Gender Equality and the Empowerment of Women
VGGT	Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security

**TABLE OF CONTENTS**

<b>DATASHEET .....</b>	<b>1</b>
<b>1. STRATEGIC CONTEXT .....</b>	<b>7</b>
A. Country Context.....	7
B. Sectoral and Institutional Context.....	8
C. Relevance to Higher Level Objectives.....	12
<b>2. PROJECT DESCRIPTION.....</b>	<b>13</b>
A. Project Development Objective (PDO) .....	13
B. Project Components .....	13
C. Project Beneficiaries .....	22
D. Results Chain .....	23
E. Rationale for World Bank Involvement and Role of Partners.....	23
F. Lessons Learned and Reflected in the Project Design .....	24
<b>3. IMPLEMENTATION ARRANGEMENTS .....</b>	<b>26</b>
A. Institutional and Implementation Arrangements .....	26
B. Results Monitoring and Evaluation Arrangements.....	27
C. Sustainability.....	27
<b>4. PROJECT APPRAISAL SUMMARY .....</b>	<b>28</b>
A. Technical, Economic and Financial Analysis .....	28
B. Fiduciary.....	30
C. Legal Operational Policies.....	32
D. Environmental and Social .....	32
<b>5. GRIEVANCE REDRESS SERVICES .....</b>	<b>36</b>
<b>6. KEY RISKS .....</b>	<b>36</b>
<b>7. RESULTS FRAMEWORK AND MONITORING .....</b>	<b>38</b>
ANNEX 1: Implementation Arrangements and Support Plan .....	48
ANNEX 2: Climate Change Considerations .....	59

## DATASHEET

BASIC INFORMATION		
Country(ies)	Project Name	
Sierra Leone	Sierra Leone Land Administration Project	
Project ID	Financing Instrument	Environmental and Social Risk Classification
P177031	Investment Project Financing	Substantial
Financing & Implementation Modalities		
<input type="checkbox"/> Multiphase Programmatic Approach (MPA)	<input checked="" type="checkbox"/> Contingent Emergency Response Component (CERC)	
<input type="checkbox"/> Series of Projects (SOP)	<input type="checkbox"/> Fragile State(s)	
<input type="checkbox"/> Performance-Based Conditions (PBCs)	<input type="checkbox"/> Small State(s)	
<input type="checkbox"/> Financial Intermediaries (FI)	<input type="checkbox"/> Fragile within a non-fragile Country	
<input type="checkbox"/> Project-Based Guarantee	<input type="checkbox"/> Conflict	
<input type="checkbox"/> Deferred Drawdown	<input type="checkbox"/> Responding to Natural or Man-made Disaster	
<input type="checkbox"/> Alternate Procurement Arrangements (APA)	<input type="checkbox"/> Hands-on Enhanced Implementation Support (HEIS)	
Expected Approval Date	Expected Closing Date	
02-Jun-2022	31-Jul-2028	
Bank/IFC Collaboration		
No		
Proposed Development Objective(s)		
The Project Development Objective is to establish an efficient and accessible land administration system.		
Components		
Component Name	Cost (US\$, millions)	



Institutional Development and Legal Reform	8.50
Land Information System Development	8.60
Recording and Registration of Land Tenure Rights	20.00
Project Management	4.00
Contingent Emergency Response Component (CERC)	0.00

### Organizations

Borrower: Republic of Sierra Leone

Implementing Agency: Ministry of Lands, Housing and Country Planning

### PROJECT FINANCING DATA (US\$, Millions)

#### SUMMARY

Total Project Cost	41.10
Total Financing	41.10
of which IBRD/IDA	41.10
Financing Gap	0.00

#### DETAILS

##### World Bank Group Financing

International Development Association (IDA)	41.10
IDA Grant	41.10

##### IDA Resources (in US\$, Millions)

	Credit Amount	Grant Amount	Guarantee Amount	Total Amount
Sierra Leone	0.00	41.10	0.00	41.10
National PBA	0.00	41.10	0.00	41.10



<b>Total</b>	<b>0.00</b>	<b>41.10</b>	<b>0.00</b>	<b>41.10</b>
<b>Expected Disbursements (in US\$, Millions)</b>				
WB Fiscal Year	2022	2023	2024	2025
Annual	0.00	2.77	3.15	5.59
Cumulative	0.00	2.77	5.92	11.51
			2026	2027
			8.40	11.30
			2028	2029
			9.30	0.59
			40.51	41.10

**INSTITUTIONAL DATA****Practice Area (Lead)**

Urban, Resilience and Land

**Contributing Practice Areas****Climate Change and Disaster Screening**

This operation has been screened for short and long-term climate change and disaster risks

**SYSTEMATIC OPERATIONS RISK-RATING TOOL (SORT)**

Risk Category	Rating
1. Political and Governance	● Moderate
2. Macroeconomic	● Moderate
3. Sector Strategies and Policies	● Substantial
4. Technical Design of Project or Program	● Moderate
5. Institutional Capacity for Implementation and Sustainability	● Substantial
6. Fiduciary	● Substantial
7. Environment and Social	● Substantial
8. Stakeholders	● Moderate
9. Other	
10. Overall	● Substantial



## COMPLIANCE

### Policy

Does the project depart from the CPF in content or in other significant respects?

[ ] Yes    [✓] No

Does the project require any waivers of Bank policies?

[ ] Yes    [✓] No

### Environmental and Social Standards Relevance Given its Context at the Time of Appraisal

E & S Standards	Relevance
Assessment and Management of Environmental and Social Risks and Impacts	Relevant
Stakeholder Engagement and Information Disclosure	Relevant
Labor and Working Conditions	Relevant
Resource Efficiency and Pollution Prevention and Management	Relevant
Community Health and Safety	Relevant
Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Relevant
Biodiversity Conservation and Sustainable Management of Living Natural Resources	Relevant
Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not Currently Relevant
Cultural Heritage	Relevant
Financial Intermediaries	Not Currently Relevant

**NOTE:** For further information regarding the World Bank's due diligence assessment of the Project's potential environmental and social risks and impacts, please refer to the Project's Appraisal Environmental and Social Review Summary (ESRS).

### Legal Covenants

**Sections and Description**

Schedule 2, Section I, A.2 (a): The Recipient shall not later than sixty (60) days of the Effective Date, establish a steering committee ("Project Steering Committee), and thereafter, maintain, throughout the period of Project implementation said steering committee with mandate, composition, and resources, satisfactory to the Association ("Project Steering Committee").

**Sections and Description**

Schedule 2, Section I, A.3 (b)(ii): The Recipient shall not later than sixty (60) days of the Effective Date, recruit and thereafter maintain a monitoring and evaluation specialist, a financial management assistant, a procurement assistant, a training coordinator, all in accordance with the Procurement Regulations

**Sections and Description**

Schedule 2, Section I, A.4(a): The Recipient shall within sixty (60) days of the Effective Date, establish the Project Technical Committee with terms of reference and functions, satisfactory to the Association, and thereafter, maintain throughout Project implementation said Project Technical Committee with the responsibility for providing technical advice.

**Sections and Description**

Schedule 2, Section I, A.4(b)(i): The Recipient shall maintain throughout Project implementation the VGGT technical working group and the inter-ministerial task force with terms of reference and functions, satisfactory to the Association, and to support land reforms within the context of the VGGT implementation framework.

**Sections and Description**

Schedule 2, Section I, A.4(b)(ii): The Recipient shall maintain throughout Project implementation the MLHCP and Office of the Administrator and Registrar General Working Group with terms of reference and functions, satisfactory to the Association, and with the responsibility for coordination in lead MDAs on administration of land processes and guiding the transitional arrangements that will be required if the proposed National Land Commission Bill is enacted

**Sections and Description**

ESCP, 1.2: Asbestos Management Plan shall be prepared, consulted upon, disclosed, and adopted prior to commencement of demolition of an existing facility for the construction of the Land Administration Building.

**Sections and Description**

ESCP, 10.2: Setting up of GRM to be undertaken within 60 days of project effectiveness.

**Conditions**

Type	Financing source	Description
Effectiveness	IBRD/IDA	Article IV, 4.01(a): The Recipient shall prepare and adopt, a Project Implementation Manual, in form and substance satisfactory to the Association



Type	Financing source	Description
Effectiveness	IBRD/IDA	<p>Article IV, 4.01(b)(i):The Recipient shall: establish the Project Coordination Unit (PCU) with functions, and terms of reference satisfactory to the association.</p>
Effectiveness	IBRD/IDA	<p>Article IV, 4.01(b)(ii):The Recipient shall hire to the PCU a Project coordinator, a procurement specialist, a financial management specialist, a community engagement and communications specialist, a social and gender specialist, all in accordance with the provisions of the Procurement Regulations</p>



## 1. STRATEGIC CONTEXT

### A. Country Context

1. **Sierra Leone has made progress towards development goals in the face of many challenges since the end of the country's civil war (1991-2002), a conflict in which key institutions, infrastructure and the economy were severely damaged.** The reestablishment of democracy over four elections since 2002 is an important achievement but signs of fragility remain. Generally, Sierra Leone benefits from both advantageous geography and abundant natural resources. The economy is driven by agriculture and mineral production. The country is one of the largest producers of such minerals as iron ore, diamonds, titanium, bauxite, and gold. Despite a decade of five percent average annual economic growth, Sierra Leone's economy has been volatile.<sup>1</sup> The Coronavirus Disease 2019 (COVID-19) pandemic hit Sierra Leone severely, but its economy has started to recover from the COVID-19 contraction.
2. **After contracting by 2.0 percent in 2020, Sierra Leone's economy grew by 3.1 percent in 2021, driven mainly by agriculture and mining reflecting the easing of mobility restrictions as well as fiscal stimulus and structural reform efforts.**<sup>2</sup> Agriculture contributed more than half of overall growth (1.9 percentage points) due to increased private sector participation in input markets. Both industry and services contributed 0.6 percentage points each, reflecting a gradual recovery of mining and manufacturing as well as trade and tourism. On the demand side, growth was driven by final consumption and gross investments (mainly public investment following the resumption of capital projects). The fiscal deficit remained elevated, despite improvements in revenues, driven by overruns in recurrent spending. Real Gross Domestic Product growth is projected to average 4.4 percent over the medium-term while poverty is expected to return to its 2019 level by 2023, but high inflation is eroding real incomes and may affect the outlook. Headline inflation has accelerated to 17.9 percent (year-on-year) by end-December 2021, reflecting global food price increases as well as a combination of recovering domestic consumer demand and enduring supply chain disruptions. The Ukraine-Russia crisis presents risks to the outlook primarily through fluctuations in commodity prices.
3. **Urban areas, particularly the capital city, Freetown, have seen the largest increase in poverty due to the COVID-19 pandemic.** Poverty in Freetown is estimated to have increased from 17.7 percent in 2018 to 29.1 percent in 2020. In other urban areas, the increase was much smaller, from 45.2 percent to 46.3 percent, and in rural areas there was essentially no change: Poverty is estimated to have declined from 71.5 percent to 71.0 percent.<sup>3</sup>
4. **Sierra Leone's population was estimated at 7.9 million in 2020 with an average annual population growth of 2.4 percent over the last decade,**<sup>4</sup> requiring 70,000 new jobs per year to maintain employment rates.<sup>5</sup> However, Sierra Leone's economy has seen very little structural change. The country suffers from a crucial lack of access to basic infrastructure and Sierra Leone performs relatively poorly on governance measures of government effectiveness, regulatory quality, corruption, and the rule of law. Sierra Leone's difficult business environment is

<sup>1</sup> World Bank (2021): Sierra Leone 2021 Economic Update. Welfare and Poverty Effects of the COVID-19 Pandemic.

<sup>2</sup> World Bank (2022): Sierra Leone Macro Poverty Outlook (Spring Meetings 2022).

<sup>3</sup> Ibid.

<sup>4</sup> World Bank Open Data (2021): <https://data.worldbank.org/>

<sup>5</sup> World Bank (2020): Country Partnership Framework for Republic of Sierra Leone for the Period FY21-FY26. Report No. 148025-SL.



a critical factor in explaining why the economy has struggled to diversify and create jobs. A structural reform agenda would need to include measures to improve the business environment; digitize the economy; strengthen governance and institutions; expand agricultural productivity and encourage agribusiness; promote value addition in manufacturing; and improve human capital to make the country attractive to investors.<sup>6</sup>

5. **Sierra Leone's climate vulnerability context is a key dimension of the country's fragility.** Sierra Leone's mean annual temperature has increased by 0.8°C since 1960 and the precipitation regime has become more erratic in the last 50 years. Recently, delays in the start of the rainy season have been witnessed.<sup>7</sup> Climate risks are associated with the second most intensive rainfalls in Africa,<sup>8</sup> extreme precipitation and sea level rise are significant threats for coastal flooding and erosion<sup>9</sup>, which threatens low-lying coastal Sierra Leone and increased population displacement, loss of property, reduction in groundwater resources, and reduced agricultural potential for coastal areas are expected impacts.<sup>10</sup> Deforestation is a key issue: Sierra Leone has lost over 34 percent of its forests between 1975 and 2018. The expansion of cultivated land, slash-and-burn agriculture and logging have been the driving force.<sup>11</sup>
6. **Unresolved land issues and gender inequality in the land sector pose a significant risk to Sierra Leone's social cohesion and economic development.** Land related disputes played a prominent role in the country's civil war, and it is estimated that 60 percent or more of all cases in the High Court arise from land disputes.<sup>12</sup> Large-scale land acquisitions that ignore local rights and do not comply with international standards for good governance are fueling Sierra Leone's fragility risks.<sup>13</sup> Women are affected disproportionately by land issues. The National Land Policy (2015) states that there is a conflict between constitutional and international provisions on gender equality vis-à-vis customary practices that discriminate against women in relation to land access, control, and inheritance. The outdated legal framework, outdated maps, inefficient institutional arrangements, a paper-based land administration system, and low levels of registered land hinder public infrastructure investments, resilient urban planning, property taxation, investments in climate-smart agriculture and reforestation, and potential positive impacts of foreign direct investments.

## B. Sectoral and Institutional Context

7. **Sierra Leone's Constitution of 1991 recognizes a dual land tenure system that dates back to the colonial period.** Land in the Western Area, including Freetown, is administered under freehold tenure while customary land in the provinces is covered by customary tenure systems (community and family tenure). World Bank assessments revealed that only a tiny percentage of land in the rural and urban areas are mapped and recorded while

<sup>6</sup> World Bank (2021): Sierra Leone 2021 Economic Update. Welfare and Poverty Effects of the COVID-19 Pandemic.

<sup>7</sup> World Bank Climate Change Knowledge Portal. <https://climateknowledgeportal.worldbank.org/country/sierra-leone>.

<sup>8</sup> After Sao Tome and Principe, See World Bank Open Data (2021): <https://data.worldbank.org/>.

<sup>9</sup> Based on results from the World Bank Group's Climate and Disaster Risk Screening Project Level Tool (Climate and Disaster Risk Screening Report for Sierra Leone Land Administration Project).

<sup>10</sup> <https://climateknowledgeportal.worldbank.org/country/sierra-leone> .

<sup>11</sup> Government of Sierra Leone (2021): Updated Nationally Determined Contribution (NDC).

<sup>12</sup> Report of the Presidential Task Force to Examine the Reasons for the Delay in the Administration of Justice and Other Related Matters (2008).

<sup>13</sup> World Bank (2021): Innovative Tenure and Investment Arrangements: Increasing Responsible Agricultural Investments in Sierra Leone. (Prepared as part of the World Bank's Land Sector Dialogue - Ghana, Liberia, and Sierra Leone (P175302) Advisory Services and Analytics).



institutional arrangements are opaque.<sup>14</sup> Sierra Leone's legal framework for the land sector stems from the 1960s and is not aligned with new technologies or principles of modern land administration and does not address women's land ownership or land use rights adequately.

8. **The Ministry of Lands, Housing, and Country Planning (MLHCP) and the Office of the Administrator and Registrar General (OARG) under the Ministry of Justice are responsible for the administration of land tenure.** MLHCP is, inter alia, responsible for surveying of all land, demarcating private and state land boundaries, leasing State land (including where acquisition of customary land for investment purposes is involved), and compiling and maintaining a comprehensive land record in the country. In the Western Area, the OARG is responsible for the registration of title deeds. OARG has offices in 4 out of 16 districts while MLHCP is represented in 6 districts and the urban Western Area<sup>15</sup> with varying staff strengths. MLHCP lacks administrative structures and policies for coordination and collaboration with councils at the district level. Both entities report low levels of capacity and lack of staff specialized in land administration and management functions such as surveying, land registration, valuation, etc. MLHCP staff report that they have not benefitted from trainings specific to their functions since 2016 and MLHCP's Surveyor Training School has been defunct since 2009.<sup>16</sup>
9. **The OARG's General Registry does not guarantee the legal validity of deed records.** Cadastral boundary data at the MLHCP is not directly connected to the ownership data managed by OARG, resulting in long, unreliable, expensive procedures, which do not guarantee the protection of the rights of the property user and/or owner. By far the majority of landowners and users in the Western Area do not utilize these official registration systems anyway, often because they are poorer members of the community who cannot afford the fees involved or because their occupation and ownership is informal. The perceived tenure insecurity in Sierra Leone is 35 percent with 68 percent of citizens being afraid that owners may ask tenants to leave and another 51 percent also being afraid of disagreements with family or relatives.<sup>17</sup>
10. **Land in the provinces is administered under uncodified customary law covering both communal and family tenure, with the bulk of land administered under the latter.** Family tenure tends to involve large, extended families with rights over a single parcel. Paramount Chiefs or traditional rulers who are members of landowning families serve as trustees/custodians of all land within their chiefdoms. Because of variations in customary land practices, there is no centralized registry and there are no boundary maps of family or communal land. As land becomes scarcer and more valuable, especially within cities and towns that have grown in the provinces, sales and leases are occurring even though their validity is not recognized by formal legislation. Records of land transactions are not consistently kept. Boundary disputes between Chiefdoms, between communities, between communities and private individuals or investors, and between extended families and individual households within families are a frequent source of conflict.
11. **Nearly all ethnic groups practice patrilineal descent, with respect to succession, marriage and other family matters that continue to regard decision making as predominantly male.**<sup>18</sup> In many cases under customary

<sup>14</sup> World Bank (2015): Sierra Leone: Land Governance Assessment Framework; World Bank (2019): Support to the Sierra Leone Land Agenda. Policy Note.

<sup>15</sup> Bo, Kailahun, Kenema, Kono, Port Loko, Pujehun, Western Area (Freetown).

<sup>16</sup> Government of Sierra Leone (2021): Management and Functional Review of the Ministry of Lands, Housing and Country Planning.

<sup>17</sup> Prindex (2020): Sierra Leone. Securing Land and Property Rights.

<sup>18</sup> World Bank (2019): Sierra Leone Support to the Sierra Leone Land Agenda: Policy Note. Report No: AUS0000874.



tenure, women are denied access to land and inheritance of land upon the husband's death, with the latter being dependent on whether she bore children with the husband or is willing to remarry a male relative of her deceased husband.<sup>19</sup> Women (and other members of landowning families) are often not well represented in negotiations as the patronage mediation role of Paramount Chiefs and Government in land deals often overpower them in forging agreements with investors and Government.<sup>20</sup> Overall, the level of land registration is very low with women's land rights being registered less often than those of men: 20 percent of urban women who own land have a title or deed with their name on it as compared to 28 percent of urban men. In rural areas 11 percent of women and 12 percent of men report to have a title or deed and men are more likely than women to own land alone (18 percent versus 5 percent).<sup>21</sup> Also, women are disadvantaged regarding access to land and land-based investment negotiations due to their lack of representation in local decision-making bodies.<sup>22</sup> There is however no reliable, regularly updated database with information on land ownership or land disputes, leading to a lack of gender-disaggregated land data for analysis and policy-making. The description of how the project will address these gender gaps is provided in the project description section below.

12. **Maps in Sierra Leone, stemming from the 1960s and 1970s, were mostly prepared by the British Directorate of Overseas Surveys and have not been updated since independence in 1961.** There are some more recent maps at larger scales that were produced for specific projects but there is no centrally organized exchange of geospatial information. In addition, the national geodetic network<sup>23</sup> was established in the 1960s and has been practically destroyed and cannot serve as a reference for land, topographic and cadastral surveys. The absence of accurate transformation parameters between the old Sierra Leone Datum of 1960 and the World Geodetic System 1984 hampers the use of legacy cadastral data along with Global Navigation Satellite System technology. This situation contributes to substandard surveying practices and flawed spatial data. The situation is complicated by the outmoded land survey standards and procedures which reduce the ability of the land administration system to provide affordable and efficient services.
13. **Cadastral maps and deed records are stored manually in different locations at the OARG and the MLHCP's former Surveyor School.** The paper records are in a poor state and are at risk of being destroyed by natural disaster, fire, or similar events. The development of a digital Land Information System (LIS) in Sierra Leone has not progressed even though attempts were made in 2014 and 2016.<sup>24</sup> Success with automating land registration and cadastre functions was limited, partly due to the separation of the registry at OARG and the cadastre at MLHCP. The data exchange between the systems is manual and unreliable and there is no automated data exchange with any other external system. Generally, the Information and Communication Technology (ICT) infrastructure in the land sector is poor and requires the replacement of old servers, data storage, computers, and other office equipment. Local Area Networks and internet connections do currently not allow for a fully functioning LIS. Despite previous plans and a few attempts, the digitization of paper archives was never completed.<sup>25</sup>

<sup>19</sup> Green Scenery (2020): How Effective is the Promotion of Women's Customary Land Rights in Improving Women's Land Tenure Security in Sierra Leone? The impact of an FAO Project in Sierra Leone.

<sup>20</sup> UNFAO (2019): Protecting Women's Customary Land Rights in Sierra Leone: Technical Report.

<sup>21</sup> Sierra Leone Demographic and Health Survey 2019.

<sup>22</sup> Ryan, C. (2018): Large-scale land deals in Sierra Leone at the intersection of gender and lineage.

<sup>23</sup> Required for establishing a common reference system for establishing the coordinate positions of all geographic data.

<sup>24</sup> World Bank (2021): Review of Land Information Systems in Sierra Leone. (Prepared as part of the World Bank's Land Sector Dialogue - Ghana, Liberia, and Sierra Leone (P175302) Advisory Services and Analytics).

<sup>25</sup> Ibid.



14. **Land issues in Sierra Leone exacerbate climate risks:** Limited tenure security disincentivizes long-term investments in reforestation or climate-smart agriculture.<sup>26</sup> The lack of registered land and up to date maps also affects climate-resilient planning and hinders disaster response activities as evidenced by the Freetown mudslide of 2017. Inadequate property spatial and ownership information undermined urban planning and the associated disaster risk management.<sup>27</sup> The lack of up-to-date land records and the lack of land-based solutions in different sectors hinders efficient interventions to mitigate and adapt to climate change. Adequate land management can promote efficient climate resilient land use planning, forest conservation, avoid environmental degradation and settlement in high-risk areas, overall contributing to climate solutions. Changes in land management affect local energy and water cycles, and therefore the local climate: Limited tenure security disincentivizes long-term investments by farmers in climate-smart agriculture as well as reforestation. Annex 2 provides an overview of how the project will address climate issues.
15. **Efforts have been made to reform Sierra Leone's land administration system.** A National Land Policy (NLP) was approved in 2015<sup>28</sup>, which is based on the principles of the internationally recognized Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries, and Forests in the Context of National Food Security (VGGT). As per the NLP, the dual land tenure system will remain in effect through the recognition of freehold, family, and communal customary tenure. The NLP envisions that land in the provinces will be recorded by District Land Commissions in coordination with customary bodies. It proposes recognizing and safeguarding all legitimate forms of land tenure, particularly for women and other marginalized groups. The NLP also provides the foundation for developing a legal and regulatory framework and identifies the need to develop a LIS and to streamline and modernize the land service delivery system. An NLP Implementation Plan was developed in 2016, however, its operationalization has never taken off due to lack of funding.
16. **A Customary Land Rights Bill (CLRB) and a National Land Commission Bill (NLBCB) have been drafted, gazetted, and tabled in Parliament in September/October 2021.**<sup>29</sup> The CLRB outlines the protection of land rights for citizens under customary law. The NLBCB establishes a National Land Commission (NLC), District Land Commissions, Chiefdom Land Committees and Town or Village Land Committees. MLHCP anticipates the passage of the two land laws in the first quarter of 2022.<sup>30</sup> The NLC would, inter alia, be responsible for management of government and public land, establish a system for registration of title, establish grievance redress mechanisms related to land, and establish a LIS. A Registration of Title Law is proposed by the NLP. Respective functions from OARG and MLHCP would be transferred to the NLC. Once this law is drafted and implemented it will give the NLC the authority to systematically register all land in Sierra Leone and guarantee all the land rights of all citizens. This is a longer-term objective that is expected to begin during the duration of the project.
17. **The Sierra Leone Land Administration Project seeks to assist Sierra Leone's land sector reforms by financing the implementation of the core aspects of the National Land Policy.**<sup>31</sup> Independent of whether the CLRB and NLCB

<sup>26</sup> Larson, A.M., et al. (2013): Land Tenure and REDD+: the good, the bad and the ugly.

<sup>27</sup> World Bank (2019): Support to the Sierra Leone Land Agenda. Policy Note.

<sup>28</sup> Government of Sierra Leone (2015): National Land Policy Sierra Leone.

<sup>29</sup> Supported by the World Bank's Third Productivity and Transparency Support Grant (P169498), which included a trigger that required the client to take a decision in Cabinet to adopt a new Land Commission Bill and a Customary Land Rights Bill and submission of the said Bills to Parliament for approval.

<sup>30</sup> The bills have been gazetted on September 27, 2021, and were received by Parliament on September 30, 2021.

<sup>31</sup> Per the NLP Implementation Plan (2016) this would include the following: public education and communication, human capacity development, policy and legal reforms, institutional reforms and enabling technology, and land rights administration reforms.



will be passed, the project will support more efficient and transparent land administration processes based on an improved institutional framework in the land sector. This will be achieved by supporting more efficient land administration processes and overcoming the segregation of ownership information held by OARG and cadastral data held by MLHCP. The digitalization of the land sector, including digitization of ownership records and maps, would contribute to this objective. This will be supported by significant capacity building efforts to ensure sustainability and scalability – either for the NLC or for the existing institutions, depending on the passage of the land laws. The establishment of a geodetic network and creation of base maps would support the establishment of reliable land information, which will be managed through the LIS. To ensure that land tenure is strengthened, especially for women, the project will finance the demarcation and registration of freehold tenure in Freetown and customary tenure in the provinces.<sup>32</sup> Since the NLP has been adopted in 2015 MLHCP and local Civil Society Organizations (CSOs) with support from the Food and Agriculture Organization of the United Nations (UNFAO) have piloted the mapping and recording of customary land in selected communities in four chiefdoms between 2018-2019.<sup>33</sup> In addition to UNFAO's long-standing technical support, the World Bank's Third Productivity and Transparency Support Grant Project (P169498) has provided support for the preparation of the CLRB and the NLCB, and the Resilient Urban Sierra Leone Project (P168608) is supporting municipal property-tax systems, but there has been no significant financing for implementing the core aspects of the NLP since its adoption in 2015 and there have been no major investments in the land sector since Sierra Leone's independence in 1961.

### C. Relevance to Higher Level Objectives

18. **The proposed project will contribute to Sustainable Development Goals 1.4.2<sup>34</sup> and 5.a.1<sup>35</sup> by registering land and issuing legally recognized documentation in urban and rural areas.** The project will also contribute to the World Bank's twin goals of ending extreme poverty and promoting shared prosperity in a sustainable way. The linkages between secure land tenure, functional land administration systems and poverty reduction have been well documented.<sup>36</sup> Specific attention will be paid to the land rights of customary communities, including women and youths, who are amongst the poorest segments of the population.
19. **The project will contribute to achieving Sierra Leone's Medium-Term National Development Plan (2019 – 2023), which seeks to achieve an inclusive, green, middle-income status by 2039.** One of the strategic objectives is to ensure effective land management and administration that is environmentally sound and sustainable for equitable access to and control over land. Amongst the key policy actions are establishing a land title registration system, developing a cadastral records management system, and establishing a National Land Commission. These objectives are aligned with the NLP and will be supported by the project.
20. **The Country Partnership Framework (CPF) between the World Bank and the Republic of Sierra Leone (FY21–26)<sup>37</sup> has identified the importance of addressing land issues.** The Project will contribute to CPF Focus Area 3

<sup>32</sup> The project scope may be expanded to additional areas if and as financing and timing allows.

<sup>33</sup> UNFAO (2019): Protecting Women's Customary Land Rights in Sierra Leone. Technical Report.

<sup>34</sup> Proportion of total adult population with secure tenure rights to land, (a) with legally recognized documentation, and (b) who perceive their rights to land as secure, by sex and type of tenure.

<sup>35</sup> (a) Proportion of total agricultural population with ownership or secure rights over agricultural land, by sex; and (b) share of women among owners or rights bearers of agricultural land, type of tenure.

<sup>36</sup> Deininger, K. (2003): Land Policies for Growth and Poverty Reduction. World Bank Policy Research Report.

<sup>37</sup> World Bank (2020): Country Partnership Framework for Republic of Sierra Leone for the Period FY21-FY26. Report No. 148025-SL. <https://openknowledge.worldbank.org/handle/10986/33871>



(*Economic Diversification and Competitiveness with Resilience*) and the relevant CPF Objective 3.2 (*Boost productivity in key sectors for a diversified economy*). The establishment of an efficient and accessible land administration system will contribute to reduced property transaction times and costs, which in turn will improve the business environment. Secure customary tenure will contribute to more responsible agriculture investments, contributing to inclusive growth. The project will also contribute to CPF Objective 3.3 (*Enhance disaster-risk management and resilient urbanization*). The land registration activities under component 3 will result in relevant data and maps required for disaster risk management systems and resilient urban planning. Annex 9 of the CPF (*Land Issues in Sierra Leone*) has informed project design.

21. **The project contributes to the World Bank's Western & Central Africa Region Priorities 2021 – 2025.<sup>38</sup>** The project will support the priority of *A New Social Contract* due to the anticipated positive impacts related to the reduction of land disputes in Sierra Leone. The project will also support the priorities with regard to *More and Better Jobs*. Project activities with regard to digitization of land records and establishment of a digital land information system will contribute to this effort and in combination with more efficient processes and capacitated institutions will improve the business environment. The project will also contribute to the goal of *Stronger Human Capital* through capacity building and the closing of land sector related gender gaps. Finally, the project will contribute to the priority of *More Climate Resilience* through its activities (see Annex 2).

## 2. PROJECT DESCRIPTION

### A. Project Development Objective (PDO)

22. The PDO is to establish an efficient and accessible land administration system. The PDO level indicators are shown in Table 1: PDO level indicatorsTable 1.

Number	PDO level indicator	PDO element
1	People with use or ownership rights recorded (Number) <ul style="list-style-type: none"><li>• Women with use or ownership rights recorded (Number)</li></ul>	Establishment of a land administration system
2	Time to complete the registration of a transaction of a land parcel in the land administration system (Days)	Efficiency of the land administration system
3	Transactions registered (Number) <ul style="list-style-type: none"><li>• Transactions registered to women (Number)</li></ul>	Accessibility of the land administration system

Table 1: PDO level indicators

### B. Project Components

23. The Project will have five components and US\$41.1 million International Development Association (IDA) grant financing as shown in Table 2.

<sup>38</sup> World Bank (2021): The World Bank's Western and Central Africa Region Priorities 2021-2025. Supporting a Resilient Recovery.



<b>Project Components</b>		<b>IDA Financing</b>
Component 1	Institutional Development and Legal Reform	US\$8.5 million
Component 2	Land Information System Development	US\$8.6 million
Component 3	Recording and Registration of Land Tenure Rights	US\$20.0 million
Component 4	Project Management	US\$4.0 million
Component 5	Contingent Emergency Response Component	US\$0.0 million
<b>Total</b>		<b>US\$41.1 million</b>

Table 2: Project Components and Financing

#### **Component 1: Institutional Development and Legal Reform (US\$8.5 million equivalent)**

24. The main objective of this component is to strengthen Sierra Leone's legal and institutional framework for land administration by supporting analyses and reform of the relevant legal framework, buildings, operational support, institutional strategies, capacity building, and sensitization campaigns.

##### *Subcomponent 1.1: Institutional Development (US\$7.5 million equivalent)*

25. **The Project will finance activities to strengthen the institutions responsible for land administration.** A business plan for the establishment of a self-funding sustainable service will be prepared to support the financial sustainability of the project investments. The project will finance the required analysis of human resources, investment and running costs, fee structures for services to be provided, including a transition plan to inform either the transition to the proposed NLC or harmonization of OARG's and MLHCP's systems. In addition, the project will finance the establishment of procedures, guidelines, and manuals for land administration processes as well as general administrative processes for land services – for the central and province levels. In line with the Nationally Determined Contributions (NDC), support will be provided to mainstream climate change adaptation issues in these procedures, guidelines, and manuals. The subcomponent will also support the funding required for office building or renovations. This will include new headquarters offices in Freetown and the four provincial capitals Bo, Kenema, Makeni and Port Loko. In addition to the civil works, the project will finance supplies of furniture, equipment, vehicles, and initial operating costs. Building design will be climate resilient, considering flood risks and energy efficiency. Access for people with disabilities will be included in the designs. The designs will also ensure that the front office and back-office operations are separated and that information on land related services and prices are displayed to the public.
26. **Most of the staff who will be working on the project activities are likely to come from existing institutions (such as OARG and MLHCP) or will be recruited for specific activities.** As laws change and activities related to survey rules, processes for registration, valuation, land management, etc., are altered then staff from other institutions and the private sector will also require training and, in some cases, licensing. A full training program will be required. The project will finance a comprehensive needs analysis and training plan, which will be broken down into annual training plans.<sup>39</sup> The implementation of the training plans will be financed by the project. Where feasible, the project will coordinate with local and regional universities, agencies and programs supported by the

<sup>39</sup> A training needs assessment is financed through a Project preparation advance.



Network of Excellence of Land Governance in Africa, led by the African Union's Africa Land Policy Center. Study tours and conference visits will also be financed by the project. In addition to formal training and education programs, the Project will finance the design and implementation of an internship program in coordination with local universities and training institutes.

*Subcomponent 1.2: Legal Reform (US\$0.5 million equivalent)*

27. **To address the outdated legal framework and to close remaining loopholes, the component will finance legal background analyses and technical support for the development of new land laws and regulations.** The primary objective is to update and harmonize the legal framework for Sierra Leone's land administration sector to enable the efficient implementation of the NLP and, more broadly, the land administration and management system so that it will embody global and regional best practices, including gender equality.<sup>40</sup> The project will finance consultancy services for conducting a legal assessment of required changes to existing land legislation; preparation of a new land title registration law; preparation of a survey law; as well as preparation of the required regulations. In addition, and in coordination with activities under component 3, the project will finance the revision of the licensing regime for cadastral survey and the examination process for accepting surveys. The technical assistance to be financed by the project will ensure that gender and climate-change considerations are part of the assessments and drafting processes. For example, the survey law should provide guidance for the surveying of cadastral boundaries as well as surveying of ecologically sensitive areas, forests, protected areas, etc. to provide a basis for climate change related activities by the government. Regarding gender, the project will support regulations for the proposed new land laws, which would provide further guidance on establishing local level land committees with specific gender quotas to establish clear processes to address the gender gap of lack of women's representation in land-related local decision-making bodies. The project will finance all costs associated with public consultations, which will be mandatory for the process of drafting new laws and regulations.<sup>41</sup>

*Subcomponent 1.3: Sensitization (US\$0.5 million equivalent)*

28. **Reform projects within the land sector affect every individual in the country and it is a fundamental requirement that the public both support and use the systems and institutions being established.** The project will finance a public awareness and sensitization program, which will focus initially on public awareness campaigns to inform people about the changes in institutions and practice of registration but will later also require very focused campaigns when new offices are built and opened or when specific programs to register property for the first time are initiated (the latter will be covered under component 3). Campaigns will include traditional communication channels but will also employ locally adapted tools and channels, such as radio shows, drama plays, etc. Sensitization campaigns will put a strong focus on women's and youths land rights<sup>42</sup> and land-related climate

<sup>40</sup> A legal assessment is financed through a Project preparation advance.

<sup>41</sup> Activities will be closely coordinated with the Sierra Leone Second Inclusive and Sustainable Development Policy Financing (P178321) activity, which includes legal support to the land sector. The Bank will provide technical assistance to legal reform processes based on previous development policy operations in this area (Third Productivity and Transparency Support Grant (P169498)) and the Land Sector Dialogue - Ghana, Liberia, and Sierra Leone (P175302) Advisory Services and Analytics).

<sup>42</sup> e.g., regarding new legal provisions for registration of women's land rights or women's quotas in local land committees as outlined in the NLP, draft CLRB and NLBC.



change issues.<sup>43</sup> A process will be developed to enable that comments submitted by communities are responded to and that feedback will inform project activities. Campaigns will also be consistent with the project Stakeholder Engagement Plan (SEP) to ensure targeted messaging to vulnerable groups as well as the Grievance Redress Mechanism (GRM) to institute a process for receiving feedback from landholders.

#### **Component 2: Land Information System Development (US\$8.6 million equivalent):**

29. Under this component, the project will finance the procurement of required ICT equipment and establishing appropriate ICT infrastructure, business processes re-engineering, design, and development of a modern LIS for automation of land administration processes, digitization of paper archives, containing deeds and cadastral maps, development of ICT and digital archive strategies, conducting cyber-security audit, and providing base maps and a geodetic network. A key design principle of the LIS will be to enable the storage of gender-disaggregated land data.

##### *Subcomponent 2.1: Establishment of a Land Information System (US\$3.5 million equivalent)*

30. **The project will finance the design and development of the LIS.** The LIS will be one of the drivers in transformation and improvement of the land administration system in Sierra Leone. The new LIS will combine land registry and land cadastre services in one unified system, for the first time fully integrating spatial and legal attributes of land records. The LIS will consist of multiple modules including a Land Information Portal, where various electronic services will be available, as well as electronic data exchange with external systems. As the first step towards LIS development, the project will finance a business process re-engineering study to map out existing processes and defining more efficient processes. Once business processes are re-engineered, system requirements will be drafted, and the development of the LIS will be initiated. The project will finance the testing of the LIS and the system introduction, which requires user trainings and further support and maintenance. The project will also finance the digitization of existing paper archives of OARG and MLHCP, capturing cadastral maps and deed documents. Paper maps will be georeferenced and vectorized where possible. Digitization works will be migrated into the digital archive module of the LIS. The project will finance ICT equipment and network infrastructure at the central and district levels. The project will make the system accessible to interested government entities and organizations such as the National Disaster Management Agency (NDMA), the Ministry of Agriculture and Forestry (MAF), Freetown City Council (FCC) will be able to access the system if they desire. Where possible, the LIS will also be linked to other government systems and local councils.

##### *Subcomponent 2.2: Base Mapping and Land Cadastre (US\$2.6 million equivalent)*

31. **To ensure that ownership, data in the LIS can be linked to cadastral boundaries, the project will finance the procurement of current high-quality orthophoto or satellite imagery to produce maps.**<sup>44</sup> This will be linked to the time frames and plans for preparing cadastral index maps under component 3 to ensure that most up-to-date maps are available when they are needed. Base maps will be prepared for all areas that will be targeted under component 3. In principle, the scale of the mapping will be selected so that visible features on the ground can be

<sup>43</sup> E.g., such as those outlined in the draft CLRB and NLCB regarding communities' responsibility to promote protection and conservation of ecologically sensitive areas.

<sup>44</sup> The Project Preparation Advance is financing an analysis of existing mapping available and a proposal for new mapping requirements will be prepared.



directly transferred from the base maps to the cadastral index maps with a minimum of field work. The subcomponent will also finance the mapping of high-risk zones so that these can be overlaid with the cadastral index maps to ensure that the project does not formalize tenure in high-risk areas that are affected by climate induced disasters, such as floods, mudslides, etc. The base maps will not only be used by the project but also by a wide range of users within the government. Base maps will be made available to NDMA, MAF, local governments, Ministry of Planning and Economic Development and other key stakeholders who can use the base maps for further risk assessments, disaster recovery programs, or planning of forestation programs.

***Subcomponent 2.3: Geodetic Network (US\$2.5 million equivalent)***

32. **To provide a geodetic reference frame for the land administration system and other spatial data capturing activities, the project will finance the establishment of a new national geodetic network with a datum based on and aligned with the International Terrestrial Reference Frame (ITRF).** The network will consist of a country wide Continuously Operating Reference Station (CORS) network and ground marks suitably located to improve the accuracy and efficiency of survey works. To provide MLHCP and other users with means to use legacy spatial data and maps, the project will finance the measurement of a sufficient number of triangulation points for computation of transformation parameters between the historic datums and ITRF. The geodetic network will at a minimum cover the target areas for land registration activities under component 3. Land survey standards and procedures will be revised to set new accuracy requirements and provide guidelines on how to use the new national CORS and terrestrial networks. Training in using the new geodetic network will include besides MLHCP and private sector surveyors, NDMA and MAF to ensure that their future mapping needs regarding disaster risk management, resilient planning and forestry will be more accurate.

***Component 3: Recording and Registration of Land Tenure Rights (US\$20.0 million equivalent)***

33. **The primary focus of this component is to improve records of land tenure rights and the processes how these rights can be transferred whether by inheritance, sale, or lease, or for some other third-party rights.** This will involve both mapping the parcels and assessing the legal and legitimate rights to those parcels. This will require participatory processes and involve a large cadre of people to visit, raise awareness, discuss with owners about their land and rights and to undertake surveys and prepare documents. The anticipated Registration of Title Law would enable a systematic process of land title adjudication and registration, but the project is not conditioned by the passage of this law. If the law is passed it will allow properties that currently do not have documented legal rights, or that have outstanding disputes or problems to resolve, to be registered. However, existing law will be used in the meantime to improve the existing land administration system. This component will finance primary data collection on land ownership and location, which will feed into the LIS supported under component 2.
34. **The component will finance activities to make the land registration and surveying of parcels and the adjudication of land and property rights more efficient, and to ensure the public will be keen to utilize formal registration systems to protect their property rights.** During the early implementation period the project will finance a study of the land registration procedures for both the formal and the customary areas with a specific assessment of women's rights to define the improvement program to be implemented. It will commence with a program to improve the existing system within OARG and MLHCP (or the NLC if the NLCB is passed) using existing law and then develop further if the new registration of title law comes into effect. Greater coordination and better efficiency within the existing system will make the transition from the existing system to the new registration of



title system smoother and simpler.

35. **Existing records held by the OARG and the MLHCP will need to be analyzed, integrated, and made ready for inclusion into the LIS.** All existing plans covering both public lands and private lands, will need to be plotted on the base maps produced under Component 2 but it is expected that a high percentage of these plans will not match the ground situation as shown on the base maps. This will then require a specific program to match the existing plans with the records held at the OARG (for private land) and the MLHCP (for public land and public land leased to the private sector or other institutions), and then matching these with the ground situation. Where there is a good match between the base maps, cadastral plans, and land records the information can be accepted. However, wherever there is a mismatch interviews with owners and field works to check the ground situation will be financed by the project. Some of this work will be outsourced and some will be done by MLHCP staff as the situation and resources demand. Where the work is done by the MLHCP staff, there will be a need to finance vehicles, equipment, and operating costs under this component. Training will be needed and financed under Component 1. Consultancy services to assist with the design and supervision of such activities will be financed. These activities will build on the digitization and mapping activities to be financed under component 2. The anticipated results will include a cadastral index map with the identified overlaps of land ownership and boundaries corrected in the existing system and it will identify parcels that are not yet mapped and where no ownership is recorded. For these areas the project will finance the development of a systematic registration plan to fill in gaps in Freetown, which will also be financed by the project. In parallel with the work being undertaken, new procedures will need to be introduced in order to ensure that the linkage created between the OARG and MLHCP (or the NLC once established) maintain the integrity of the linked system and make the whole process of transacting with land or buildings more efficient. Consultancies to do this work will be financed by this component.
36. **This component would also finance the piloting and roll-out of land registration activities in Freetown and selected customary areas in the provinces.** The exact locations in the provinces will be determined based on pilot results and multi-stakeholder consultations to identify specific criteria for the selection of areas. Criteria will need to find the balance between practical aspects (readiness and willingness of communities and customary authorities to participate) and relevant needs on the ground (prevalence of land conflicts, investment potentials/interests, proximity to urban centers, climate change risks, etc.). Activities under this component would establish land data for other line ministries and agencies to improve tenure security, resilient planning, property taxation, reforestation, climate smart agriculture and disaster prevention and responsiveness.
37. **In Freetown, parcels that have been identified as having no recorded ownership will be adjudicated and registered.** This component will finance initial activities in this regard. Where feasible, generated fees will be used for this purpose as well. Activities to be financed would include technical assistance for planning and managing the activities, implementing an awareness raising campaign, and financing the actual field work related to mapping and registration. Field work will ensure that spouses are jointly registered.
38. **The component will finance pilot activities for participatory survey and recording of women's and men's customary land rights as a first step.** The pilots will build on previous pilots implemented by MLHCP and local CSOs with support from UNFAO. Several customary land registration steps have already been tested, including awareness raising, creation of Village Area Land Committees and their respective bylaws as well as customary land ascertainment, demarcation and recording using mobile technologies. However, the pilots did not issue documents to owners and the properties that were surveyed and mapped are very large family units (averaging



60 people per parcel with a 79.2 hectare average parcel size). An assessment of the pilot results would be financed and would inform the development of a more comprehensive and feasible program for customary land recordation and registration. The output would be formal customary land registration guidelines including costs and time requirements as well as clearly described process for including women in decision-making processes and ensuring that women are registered, either single, jointly with husbands/partners or as part of a family.

39. **Once the pilot work in the provinces is completed, the project will finance the actual mapping and registration of customary rights and establishment of required land committees in priority areas.** The Project will finance the required management expertise, activity-specific awareness raising activities, surveying equipment, operational equipment such as vehicles, field staff for the mapping and recording of ownership information, equipment needed for printing of documents, etc. Specific attention will be paid to the registration of the land rights of women and youths. In addition, the project will finance the establishment of required local land related decision-making bodies in line with the government's official gender quota of at least 30 percent to strengthen women's decision-making powers in land related institutions. This will help to address the current situation in which mostly male Chiefs and Chiefdom Councils take decisions on behalf of communities, without necessarily consulting women. Mobile technologies and participatory fit for purpose surveying and mapping approaches will be applied. The exact geographical areas for pilot work will be based on a typology, which will be developed, which including the pilot areas, which will be selected based on existing pilot experiences and willingness of communities to participate, to ensure that the processes can be successfully piloted. Once the processes are established and tested, scale-up areas will be selected based on additional criteria, which would include willingness of communities to participate, economic potentials, proximity to urban areas, etc.

#### **Component 4: Project Management (US\$4.0 million equivalent)**

40. **This component will finance all expenses required to ensure efficient and transparent project management and coordination.** A Project Coordination Unit (PCU) will be established at the implementing agency, MLHCP. The project will finance all external consultants to be hired as PCU staff. All PCU related operational costs such as communication costs, vehicles (including operation and maintenance), office equipment etc. will be financed under this component as well.
41. **Required studies, such as customer feedback surveys, baselines, a mid-term review, and an implementation and completion report will be financed to inform the Monitoring and Evaluation (M&E) system of the project.** It is anticipated that an impact evaluation will be conducted in collaboration with the World Bank's Gender Innovation Lab to assess impacts of customary land registration activities on women and men. In addition, social and environmental studies as required per the World Bank's Environmental and Social Framework (ESF), including the establishment and operation of a GRM will be financed under this component.

#### **Component 5: Contingent Emergency Response Component (CERC) (US\$0.0 million equivalent)**

42. Following an eligible crisis or emergency, the Borrower may request the World Bank to re-allocate project funds to support emergency response and reconstruction. This component would draw from the uncommitted grant resources under the project from other project components to cover emergency response. A CERC annex to the PIM for this Component will be prepared by the Borrower and will provide detailed guidelines and instructions on how to trigger the CERC and use funds (including activation criteria, eligible expenditures, and specific



implementation arrangements as well as required staffing for the Coordinating Authority).

#### *Climate Change*

43. **Project activities will contribute to the World Bank's Climate Change Action Plan (2021-2025)<sup>45</sup>, the Government's National Climate Change Policy,<sup>46</sup> Climate Change Strategy and Action Plan<sup>47</sup> and the intended NDC.<sup>48</sup>** It is the project's intent to address impacts of climate change on the project's beneficiaries and on land administration offices in line with these policies, strategies, and action plans. Based on the project activities, the main focus will be on adaptation measures. The project will support two out of five key systems highlighted in the World Bank's Climate Change Action Plan: (1) agriculture, food, water, and land; and (2) cities.<sup>49</sup> These are also reflected in the country's NDC strategies. *Agriculture, food, water, and land* requires improved natural resource management, which benefits from secure tenure, which provides incentives for long-term investments in climate-smart agriculture and reforestation.<sup>50</sup> Furthermore, clear and recognized tenure rights and land ownership data are often the primary basis for performance-based payments in carbon financing instruments.<sup>51</sup> With regard to *cities*, the project would contribute to resilient cities and integrated land use planning as a digital land information system would enable improved climate resilient land use planning and improved urban own source revenue generation. Registering, and digitizing land data protects property rights and their owners during disasters since land data enhances early warning systems, systematic evaluation of disaster damage and development of climate disaster compensation and insurance schemes.<sup>52</sup> The project intends to finance specifically (1) construction or renovation of land offices with climate resilient designs;<sup>53</sup> (2) mainstreaming of climate change adaptation throughout land sector operations, guidelines, laws and regulations, and sensitization campaigns<sup>54</sup>; (3) making the land information system accessible to other institutions if they desire, including NDMA to improve responsiveness to climate induced disasters, the Freetown City Council for improved climate-resilient land use planning, and MAF to inform reforestation as well as carbon financing related activities; and (4) register land rights and establish local land committees to incentivize long-term investments, including reforestation and climate-smart agriculture.

#### *Gender*

44. **The project is aligned with the government's Gender Equality and Women's Empowerment Policy (2020).** The policy identifies lack of access and ownership of land for women as a key issue and seeks to review and develop

<sup>45</sup> World Bank (2021): World Bank Group Climate Change Action Plan 2021–2025: Supporting Green, Resilient, and Inclusive Development. <https://openknowledge.worldbank.org/handle/10986/35799>

<sup>46</sup> Government of Sierra Leone (n.d.): National Climate Change Policy.

<sup>47</sup> Government of Sierra Leone (n.d.): National Climate Change Strategy and Action Plan.

<sup>48</sup> Government of Sierra Leone (n.d.): Sierra Leone's Intended Nationally Determined Contribution (INDC); Government of Sierra Leone (2021): Updated Nationally Determined Contribution (INDC).

<sup>49</sup> The five key systems are: Energy; agriculture, food, water, and land; cities; transport; and manufacturing.

<sup>50</sup> UNFAO (2014). Climate-smart agriculture & resource tenure in Sub-Saharan Africa: A Conceptual Framework.; Rahman, S., Sunderland, T., Roshetko, J. & Healey, J. (2017). Facilitating smallholder tree farming in fragmented tropical landscapes.

<sup>51</sup> Forest Carbon Partnership Facility (2016). Carbon Fund – Methodological Framework. 41 p.; Larson, A.M., et al. (2013). Land Tenure and REDD+: the good, the bad and the ugly.

<sup>52</sup> World Bank (2020): Solid Ground: Increasing Community Resilience Through Improved Land Administration and Geospatial Information Systems.

<sup>53</sup> Depending on the location, this will include flood risk considerations, and energy efficient building designs in all locations.

<sup>54</sup> See NDC Action: "*Mainstream climate change adaptation into land reforms (including establishment of a land commission and revision of the land policy)*" per Government of Sierra Leone (2021): Updated Nationally Determined Contributions (NDC).



land related laws that will ensure that women's land rights are registered either individually, jointly with husbands/partners or as part of a family and that women can access and request any land related services (sale, lease, subdivision or merging of parcels, mortgaging, etc.). Further, the project will be implemented in line with the gender provisions of the NLP, which seek to "*ensure equal tenure rights and access to land for women and girls independent of their civil or marital status*". The NLP also commits to work on the "*repeal, modification or elimination of all laws, policies, customs and practices that discriminate on the basis of gender*". The project will be aligned with the World Bank Gender Strategy (FY16-23)<sup>55</sup>, which seeks to remove barriers to women's ownership of and control over assets, including land.

45. **Gender Gap:** The project will specifically seek to address the gaps of (1) women's land rights being registered less often than those of men; (2) lack of data on women's land rights; and (3) lack of women's representation in land related decision-making bodies. Overall, the level of land registration is very low with women's land rights being registered less often than those of men: 20 percent of urban women who own land have a title or deed with their name on it as compared to 28 percent of urban men. In rural areas 11 percent of women and 12 percent of men report to have a title or deed and men are more likely than women to own land alone (18 percent versus 5 percent).<sup>56</sup> Also, women are disadvantaged regarding access to land and land-based investment negotiations due to their lack of representation in local decision-making bodies.<sup>57</sup> There is however no reliable, regularly updated database with information on land ownership or land disputes, leading to a lack of gender-disaggregated land data for analysis and policy-making.
46. **Gender Action:** The project will contribute to closing gender gaps by (1) registering women's land rights during systematic land registration activities (individually or jointly with husbands/partners or families), which will strengthen women's legal ability to claim their land rights, access land administration services (sale, lease, merging/subdivision of parcels, mortgaging, etc.) and strengthen their position regarding land related decision-making within their relationships, community, and family (e.g. with regard to negotiating with external investors); (2) creating LIS functions to ensure that sex-disaggregated land data is available to enable a detailed data analysis of land ownership and related gender gaps to inform future projects to close identified gender gaps; and (3) establish local land governance bodies in line with the government's gender quotas to increase women's representation in land related decision-making bodies, making land administration services more accessible to women in rural areas; making women more comfortable to seek guidance from such bodies; and increase the reporting from women on any potential land related issues, which in turn would counterbalance the current situation in which mostly male Chiefs and male Chiefdom Councils take land-related decisions without adequate consultations of women.
47. **Gender Indicators.** The following are the Project indicators to measure the actions to close the gender gap:
  - a. Women with use or ownership rights recorded (number)
  - b. Transactions registered, of which to women (percentage)
  - c. Digital land information system is functional with ability to generate sex-disaggregate data (yes/no)
  - d. Chiefdom Land Committees and Town or Village Land Committees with at least 30% female membership (percentage)

<sup>55</sup> World Bank (2015): World Bank Group Gender Strategy (FY16-23): Gender Equality, Poverty Reduction and Inclusive Growth.  
<https://openknowledge.worldbank.org/handle/10986/23425>

<sup>56</sup> Sierra Leone Demographic and Health Survey 2019.

<sup>57</sup> Ryan, C. (2018): Large-scale land deals in Sierra Leone at the intersection of gender and lineage.



### C. Project Beneficiaries

48. **The primary beneficiaries of this project will be the general public, especially landowners and land users in Freetown and the Provinces, estimated at approximately 1 million.** It is estimated that between 250,000-500,000 people of the population of Freetown (1.2 million<sup>58</sup>) will benefit from clearer land ownership documentation through corrected land records or new surveys of properties where needed. In the Provinces, it is estimated as well that between 250,000-500,000 people will benefit from the mapping and registration of family land.<sup>59</sup> The security provided by making land rights, and the geographic extent of those rights, clear are beneficial as: (a) it removes the threat of land being taken away unfairly or without adequate compensation; (b) it gives confidence to individuals and businesses that they can invest their time and money to improve their property or increase productivity (including long-term climate-smart investments or reforestation) as the benefit will remain with them; (c) it reduces land related disputes and conflicts and therefore secure livelihoods; and (d) it will give them a reliable asset that can be used for borrowing money for investment or property improvement. In addition, if combined with suitable information about inheritance planning it will make inheritance issues simpler to resolve, benefitting women, girls, and youths. As the project has specific activities focused on gender equality issues, customary rights, and the improvement of government services to the neediest in informally developed areas, it will have very positive social impact.
49. **The government will benefit from increased institutional and human resource capacities and from having clearer information about land and land rights that would make dealing with disputes simpler and therefore reduce the number of court cases and the time taken to resolve such cases.** It will enable the government to plan better for future land development programs and dealing with disasters or climate change affected areas. Government will be better able to make strategic decisions about providing social services and infrastructure to all sections of the community, while also increasing the income received from fees or taxes so that such services can be better provided.
50. **Current and anticipated impacts of climate change on the project's beneficiaries.** Landholders in Freetown and the provinces are affected by climate change. As outlined in the country context section, project beneficiaries in Freetown are impacted by the second most intensive rainfalls in Africa, which become more extreme with climate change, generating flood and landslides and sea level rise leading to coastal flooding and erosion. These impacts are closely connected to land tenure and land use rights. Increased risks of natural disasters caused by climate change may transform an increasing number of areas into high-risk zones that are not suitable for residential or industrial uses. This could result in a change of land tenure arrangements and change of the government's land related policies regarding land rights in such high-risk zones. The project will record boundaries and information of land users in such areas to inform future policies and ensure that information about citizens in such areas is known to government. Land will however not be registered in high-risk zones to avoid incentivizing the settlement of citizens in such areas. Furthermore, flooding could potentially affect the government beneficiaries in case the land office locations are prone to flooding. Building design will be climate-resilient and will take such potential climate impacts into account (see Annex 2 for more details).

<sup>58</sup> World Bank Open Data (2021): <https://data.worldbank.org/>

<sup>59</sup> Calculated based on data from the UNFAO pilots and the 2015 Sierra Leone Population Census (Statistic Sierra Leone, 2016).



## D. Results Chain

51. 1 illustrates the results chain and theory of change of the Project.

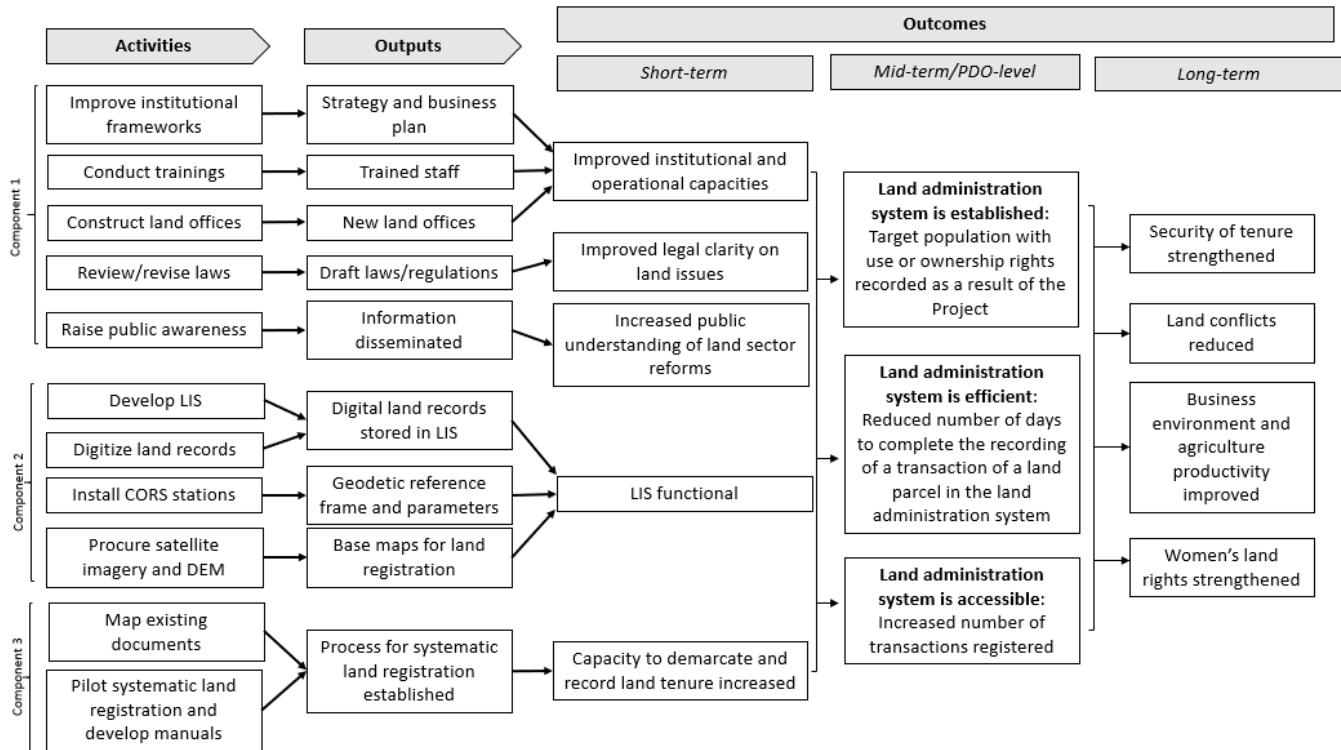


Figure 1: Theory of Change

## E. Rationale for World Bank Involvement and Role of Partners

52. **The World Bank has accumulated considerable knowledge and experience on the workings of land tenure systems – globally and in Africa - with over forty years of experience in supporting land administration systems and land registration processes.** The World Bank can therefore provide global best practices and knowledge to support project design and implementation. The project design is informed from the experiences of recent similar land administration Projects in Cote d'Ivoire<sup>60</sup>, Liberia<sup>61</sup>, and Senegal<sup>62</sup>. The World Bank thus brings both practical and technical experience to the Government of Sierra Leone (GoSL). The World Bank can also capitalize on its role as a convening power to help coordinate and leverage interventions by other development partners and the private sector in the land sector.

53. **The World Bank has supported Sierra Leone's land sector since 2015 through the Land Governance Assessment**

<sup>60</sup> Cote d'Ivoire Land Policy Improvement and Implementation Project (P157206)

<sup>61</sup> Liberia Land Administration Project (P162893)

<sup>62</sup> Senegal Cadastre and Land Tenure Improvement Project (P172422)



**Framework.** In addition, the World Bank prepared a land sector review in 2019<sup>63</sup>; and conducted reviews of land information systems, responsible agricultural investments, and property valuation/taxation in 2021.<sup>64</sup> The World Bank's portfolio includes several Projects related to land issues or geospatial technologies. These include the Smallholder Commercialization and Agribusiness Development Project (P153437); Extractive Industries Technical Assistance Project Phase 2 (P160719); Sierra Leone Economic Diversification Project (P164212); Resilient Urban Sierra Leone Project (P168608); Sierra Leone Digital Transformation Project (P177077); and Sierra Leone Second Inclusive and Sustainable Development Policy Financing (P178321). The project will be coordinating closely with these projects and the project team will continue to coordinate with the ongoing First Inclusive and Sustainable Growth Development Policy Financing (P175342), which includes a prior action regarding the proposed land bills. The project would be the first major and only financing instrument for the implementation of the NLP, which would benefit the referenced agriculture, private sector, mining and urban development sectors and projects, and would at the same time benefit from the digital sector reforms included in the project portfolio.

54. **During project identification and preparation, the World Bank has worked closely with UNFAO, the key development partner in Sierra Leone's land sector.** UNFAO has prepared several background studies and implemented initial pilots on the registration of customary land. The project will continue to coordinate with UNFAO during project implementation. The United Nations Entity for Gender Equality and the Empowerment of Women (UN Women) has signaled interest to support MLHCP with the use of drones in the mapping and registration of customary land rights, particularly by women and girls, capacity building and public sensitization. The project will coordinate with UN Women throughout project implementation if this support materializes.

#### F. Lessons Learned and Reflected in the Project Design

55. **Organizational development.** Capacities in land related disciplines at national and local levels are often crucial for effective delivery of services under land administration programs. Lessons have been learned from Ghana and Uganda as well as Malawi and Ethiopia with different approaches to capacity building programs.<sup>65</sup> To ensure a dedicated focus on building capacities, the project design has dedicated a full component to organizational development and capacity building. A mix of different approaches will be applied, including short-term and long-term training courses, cooperation with local universities, agencies and potentially the Network of Excellence on Land Governance in Africa, training on the job, internship programs, etc. Lessons learned regarding institutional reforms in low-capacity and conflict affected countries like Liberia<sup>66</sup>, Burkina Faso<sup>67</sup> and other countries,<sup>68</sup> have been integrated. A key lesson learned is that project design needs to be informed by a comprehensive understanding of the underlying sources of tenure insecurity and ensuring that activities are adequately tailored to address them. The project has included lessons from previous World Bank advisory services and analytics<sup>69</sup> and the project will continue to reflect these lessons by incrementally strengthening the legal and policy framework as well as factoring in local capacity to implement and sustain project activities and taking measures to enhance

<sup>63</sup> World Bank (2019): Support to the Sierra Leone Land Agenda. Policy Note.

<sup>64</sup> Land Sector Dialogue - Ghana, Liberia, and Sierra Leone (P175302).

<sup>65</sup> B. Shiferaw & E. Karamete (2021): World Bank's Contribution to Land Governance in Africa – A Review of the Land Administration Portfolio

<sup>66</sup> Liberia Land Administration Project (P162893).

<sup>67</sup> Support to Land and Mining Management Strengthening Project (P169267).

<sup>68</sup> World Bank (2016): Lessons from Land Administration Projects: A Review of Project Performance Assessments.

<sup>69</sup> Support to the Sierra Leone Land Agenda (P169681) – FY19; Land Sector Dialogue – Ghana, Liberia, and Sierra Leone (P175302) – FY21-FY22.



this capacity.

56. **Land information systems.** Lessons from similar investments in the region (Cote d'Ivoire, Ghana, Liberia, Malawi, Senegal, Uganda, Tanzania) have informed project design. Key principles are: following an incremental approach to system development; creating a unified database with ownership and parcel information; having one main responsible authority in place; using open-source platforms as core building blocks to support financial sustainability; use of best practices and standards;<sup>70</sup> provision of electronic services to customers to enable system interactions; and provision of data exchange with other, relevant government systems. Archive digitization, map vectorization and data quality improvements have been identified as critical steps to ensure high data quality and reliability.<sup>71</sup>
57. **Registration of land rights and gender.** Activities under component 3 will be implemented based on local, regional, and global experiences and lessons learned regarding large scale land registration programs. Lessons from Rwanda have informed project design with regard to establishing a cost-effective, fast, and efficient demarcation and registration program, which ensured that women and men were registered jointly, independent of their marital or social status. Rwanda demarcated and registered over 10 million land parcels within three years, subsequent to initial policy reforms and piloting.<sup>72</sup> However, differences with regard to customary systems and parcel sizes have been taken into account. The use of simple technologies for the demarcation of boundaries in customary areas with a general boundaries approach will be employed under component 3 in line with the fit-for-purpose principles based on global lessons learned regarding large scale land registration programs.<sup>73</sup> Activities under this component have also been informed by findings from the World Bank's Gender Innovation Lab on how to increase registration of women's land rights.<sup>74</sup> The general principles of the VGGT that are based on global lessons learned have informed project design as they have also informed the development of the NLP.
58. **Lessons learned from land registration pilots in Sierra Leone.** The project design has been informed by pilots implemented by MLHCP, CSOs and UNFAO, which provide lessons on awareness raising, training and technology for customary land rights registration. With regard to customary institutions, UNFAO has identified several lessons learned: Communities raised in all four districts covered by the study is the management of communal land tenure by the Chiefdom Councils on behalf of the community; training of women community leaders and land rights advocates facilitates local dialogue and open participation of women in land rights discussions leading to the development of land and natural resources governance by-laws; tradition continues to forbid the selling of family land in some areas, but allows the granting of land to strangers and short-term tenancies for farming; training of youth in basic mapping techniques as para-surveyors empowers youth to participate in land related discussions with elders; and there are local variations in the practice, levels of flexibility towards gender-equal land rights and opportunities to reform customary law.<sup>75</sup> The lessons learned will inform pilots and upscaling of land registration in customary areas.

<sup>70</sup> <https://www.iso.org/standard/51206.html>; <https://www.ogc.org>; <https://www.iso.org/standard/54534.html>

<sup>71</sup> World Bank (2021): Land Information Systems in Sierra Leone.

<sup>72</sup> C. English et al. (2019): Securing land rights at scale. Lessons and guiding principles from DFID land tenure regularisation and land sector support programmes.

<sup>73</sup> International Federation of Surveyors & World Bank (2015): Fit-For-Purpose Land Administration.

<sup>74</sup> Gender Innovation Lab (2020): Top Policy Lessons in Women's Property Rights.

<sup>75</sup> UNFAO (2020): Innovative Solutions to Protect Women's Customary Land Rights in Sierra Leone.



### 3. IMPLEMENTATION ARRANGEMENTS

#### A. Institutional and Implementation Arrangements

59. **Project Coordination Unit.** MLHCP will establish a PCU to handle the day-to-day coordination of project activities. The PCU will be responsible for the preparation of annual work plans and budgets, preparation of Terms of Reference (TORs) and specifications, project monitoring and reporting, as well as general stakeholder coordination. The PCU will be staffed with a Project Coordinator; Land Advisor; Land Registration Specialist; Procurement Specialist; Procurement Assistant; Financial Management Specialist; Financial Management Assistant; M&E Specialist; Training Coordinator; Community Engagement and Communications Specialist; Social and Gender Specialist; and an Environmental Specialist (as needed). Support staff will consist of an Administrative Officer, a Project Office Assistant and two Project Drivers.
60. **Fiduciary implementation arrangements.** Fiduciary services are handled on a temporary basis during the implementation of the Project Preparation Advance (PPA) by the Project Fiduciary Management Unit (PFMU) under MOF. Due to the lack of capacities at MLHCP, it was agreed that the PFMU will handle fiduciary services on an interim basis until fiduciary staff (Procurement Specialist and Financial Management Specialist) has been hired for the PCU. The Project will hire fiduciary staff who will be part of the PCU. Once the Procurement Specialist and Financial Management Specialist have been recruited by MLHCP, PFMU will hand over all fiduciary functions carried out during the PPA phase to the PCU under the MLHCP. PFMU and MLHCP shall coordinate the handover of fiduciary services to ensure there are no gaps in the provision of fiduciary services during the transition period, which will need to occur prior to effectiveness of the project.
61. **Project Steering Committee.** A Project Steering Committee (PSC) will be established to review the overall progress of the project, annual work plans and budgets and providing strategic and policy direction on all project activities. The PSC will be chaired by MoF. Members will consist of the MLHCP and OARG. The PSC will meet every six months and additional meetings will be organized on an as needed basis.
62. **Project Technical Committee.** A Project Technical Committee (PTC) will be established to provide technical advice. The PTC will meet on a quarterly basis and additional meetings will be organized as needed. Members will consist at a minimum of one representative from Ministry of Finance (MOF); MLHCP; Ministry of Justice; Ministry of Environment; MAF; Ministry of Mines and Mineral Resources; Ministry of Information and Communications; Ministry for Local Government and Rural Development; Ministry of Social Welfare, Gender and Children's Affairs; OARG; Environmental Protection Agency; Directorate of Science, Technology and Innovation; Sierra Leone Investment Board; National Council of Paramount Chiefs; and civil society.
63. **VGGT Technical Working Group and Inter-Ministerial Task Force.** A VGGT Technical Working Group (TWG) has been created in 2014 to support land sector reforms and consists of government, CSOs and private sector representatives. Development partners join the TWG as observers as needed. An Inter-Ministerial Task Force (IMTF) was established as well to coordinate the VGGT implementation framework on the government side. The PCU will coordinate closely with the TWG and IMTF throughout project implementation.
64. **MLHCP and OARG Working Group.** Government has established a dedicated working group between MLHCP and OARG, the two key institutions responsible for land administration at the moment. If the Land Commission Bill is



passed, it would require significant coordination between MLHCP and OARG to ensure adequate transition arrangements are in place to establish the proposed National Land Commission. If the NLCB is not passed, the Project will also require close coordination between MLHCP and OARG to enable more efficient land administration processes by linking the deeds registry with the cadastral system.

65. **Civil Society Organizations.** CSOs are actively involved in land sector reforms and participate regularly in the existing TWG and have participated during project preparation. CSOs will play a key role during consultations regarding the project's legal reform activities under component 1. Further, CSOs will assist with the design and implementation of sensitization activities under components 1 and 3. CSOs will also play a critical role with regard to alternative dispute resolution, especially during the implementation of land registration activities under component 3. A consultancy firm will be hired to assist with the planning and logistics of land registration activities. The firm will be working closely with CSOs to ensure that the local realities of communities are included in the design and implementation of activities.

## B. Results Monitoring and Evaluation Arrangements

66. **MLHCP will define M&E arrangements in its PIM** and submit quarterly and annual monitoring tables and progress reports to the World Bank. An M&E Specialist will be hired as part of the PCU and will develop an M&E Plan with a dedicated budget for data collection needs. Indicator sheets will be included to document the definition of each indicator, data sources, reporting timelines, and reporting formats. Customer satisfaction surveys will be conducted in year one of the project, at mid-term and close of the Project as part of citizen engagement activities. All M&E results will guide and steer project activities and will inform potential changes to activities if needed. The PCU M&E Specialist will work closely with MLHCP's M&E staff as well as the National Monitoring and Evaluation Directorate and contribute to M&E related capacity building.
67. **A GRM will be established to monitor and resolve grievances received from beneficiaries, including citizens, specialized users (e.g., surveyors, notaries) and government agencies.** MLHCP will hire a social safeguards specialist for the PCU who will respond to all feedback and the information gathered will also be used to improve services provided and to mitigate any negative social impacts. The GRM will increase transparency and accountability, and aims to reduce the risk of potentially adverse, unintended impacts. It will also serve as an important feedback and learning mechanism for improving project implementation. Results will be reported as part of the quarterly and annual reports to the World Bank.

## C. Sustainability

68. **The Borrower has demonstrated strong commitment and ownership of the project.** A dedicated technical team has been assigned to assist with project preparation and implementation. The Borrower has demonstrated its will to coordinate and collaborate with other government entities, CSOs and development partners as evidenced by joint missions with relevant stakeholders. VGGT TWG meetings have been held and the received inputs have informed project design. An MLHCP/OARG working group has been established as well to improve sector coordination. The ongoing legal reforms regarding land and the existence of an NLP implementation plan demonstrate the long-term commitment of the Borrower to land sector reforms.
69. **Financial sustainability and the ability to finance the maintenance of systems, equipment, vehicles, CORS, etc.**



**will be supported.** The project has included in the design the preparation of a business plan at the very early stage to enable increased revenue and fee generation as well as retention of the revenue generated to ensure maintenance and operation of the investments. To maintain project results beyond the project timeframe, a strong emphasis has also been put on human and institutional capacity building. Component 1 is dedicated to address existing institutional and human capacity constraints in the land sector and seeks to build a more sustainable institutional framework with adequately trained staff. Sensitization activities will promote the registration of transactions, which has proven in other projects as an obstacle to the long-term use of new land administration systems.

#### 4. PROJECT APPRAISAL SUMMARY

##### A. Technical, Economic and Financial Analysis

###### *Technical Analysis*

70. **Design issues.** The CLRB and NLCB have been drafted, gazetted, and tabled to Parliament. The NLCB establishes the NLC. The CLRB outlines the protection of land rights for citizens under customary law. MLHCP anticipates the passage of the two land laws in the first quarter of 2022. While enactment of these laws (followed later by supporting regulations) will greatly facilitate the establishment of a transparent and efficient land administration system, the government has the legal authority to undertake activities toward achieving that objective without the new laws. Similarly, it also appears that passage of a new title registration law that is consistent with the NLCB will increase the likelihood of successful delivery of Component 3, but it need not occur prior to approval of the project. If the Registration of Title Law is passed, this will give the authority to modify the current system of recording land to create a more unified and efficient system for registering land rights. While land can already be registered in the current legal framework and the pending CLRB, the Registration of Title Law would integrate the different registration systems with regard to State land, customary land, and private land in one unified system with one set of procedures that allows for a complete record of all land parcels.
71. **Appropriateness of design to the needs and capacity of the Borrower.** The project has been designed in close coordination with MLHCP as well as the TWG and PSC members. As outlined in the lessons learned section, the project has been designed to focus on establishing the basic elements of a modern land administration system. The type of project activities, sequencing and complexity have been tailored to the country context, based on the the World Bank's experiences with land administration projects in countries with similar low-capacity and conflict-affected contexts such as Liberia<sup>76</sup> and Burkina Faso.<sup>77</sup> Depending on the increase of capacities and speed of implementation, the scope of some activities could potentially be expanded. For example, additional modules to the LIS could be added if time and financing allows. However, this is subject to project progress with the basic elements of the land administration system. Overall, the project design is aligned with the activities proposed in the NLP and its implementation plan, which have been confirmed as relevant.
72. **Institutional arrangements and organizational issues.** The project foresees the passage of the NLCB, which would enable the project to support the establishment of the NLC and foresees establishment of local level land

<sup>76</sup> Liberia Land Administration Project (P162893).

<sup>77</sup> Support to Land and Mining Management Strengthening Project (P169267).



committees. However, even if the NLCB would not be passed, the project would be able to operate and improve the existing institutional arrangements. The existing institutions that are responsible for land administration, MLHCP and OARG, have been duly consulted during project preparation and a joint working group to address issues related to institutional coordination has been established during the course of project preparation. If the NLCB is not passed, project activities would support a more efficient model of cooperation and digital data exchange within the existing framework.

*Economic and Financial Analysis*

73. The economic analysis of the project consists of a cost-benefit analysis of the stream of benefits and costs related to interventions in component 3 of the project. The key parameters of the analysis include the following: (i) Valuation of costs and benefits: based on market; (ii) Appraisal period: a 15-year appraisal period; (iii) Discount rate: a 10 percent discount rate; and (iv) Currency: cost and benefits denominated in US\$. There are several channels of land and property rights investments that produce economic benefits.
74. **Increased private returns to land investments as a result of improved perception of tenure security:** Land value data for urban and rural areas were collected from estate agents and MLHCP respectively. The average value of land in the Western Area (Urban) obtained from interviews with private land agents is estimated to be US\$2,000 whilst a plot of land in the rural area, based on data obtained from MLHCP is estimated to be US\$150. In the rural areas land is mostly sold in hectares and it is estimated that a household has about 1.7 hectares. In the model, the value of land is estimated to grow at 2 percent annually without the project and at 3 percent with the project. Interviews with private land agents revealed that annual increase in price of land is around 15 percent annually because of the strong demand. However, because the model uses US\$, we assume a minimal price increase of 2 percent annually, with improved tenure arrangements. In order not to double count, the net increase in rural land value though estimated was not included in the total benefits of the project, as net agricultural productivity increases were selected for modeling. Data collected from MAF indicate that there are approximately 113,730 marketable hectares in the Western Area and other key Provincial townships in the country that are expected to benefit from the project, but only a moderate one-third of this is used for modeling purposes. The total number of marketable plots is split equally between urban and rural areas. These numbers of plots are then spread over 15 years to reflect the annual land registration as a result of the intervention.
75. **Data on agricultural productivity and yield:** Yield is estimated to be 1.74 tons per hectare. Average yield growth in the past five years has been about 1.2 percent and this is used in the model in the case without the project. Agricultural yield is assumed to grow at about 2.2 percent with the project. This additional one percent increase in yield during the project is because it is assumed that as more investments go into the agricultural sector, some of it could be on improving yields through the use of improved seed varieties, extension services and lower loses through the use of improved farming practices. Further, it is assumed that 25 percent of total foreign direct investment inflows goes to agriculture. According to the Balance of Payment statistics of the Bank of Sierra Leone, foreign direct investment in 2019 totaled US\$342.5 million and 25 percent of that gives about 81.13 million as agricultural investment. It is also assumed that agricultural investments will grow at a rate of 10 percent as a number of regulations and laws recently passed, as well as improved land tenure security will create an enabling environment that will result to increase in private investments in agriculture
76. **Reduction in the transaction time of land service delivery through reductions in time of registering land:** The



key data points to assess the economic impact of this benefit stream is the time used to register property. Current evidence suggests that the time used to register property is 56 days. The project estimates this time to reduce to 35 days, leading to a time savings of 21 days. This time savings was monetized for modeling purposes using the average monthly wage and then estimating the hourly wage. It is assumed the standard working hours of 8 hours per days. A total 168 hours is saved and monetized in the model by multiplying by the hourly wage. However, only 10 percent of the days saved, equivalent to 16.8 hours is monetized and included in the model. The average monthly wage is estimated to be US\$495.18, and the total number of beneficiaries is 250,000 and this is spread over the 15-year period.

77. **The results of the economic analysis are as follows:** The estimated economic Net Present Value (NPV) of the whole project is approximately US\$30.6 million, using a 10 percent discount rate and an Internal Rate of return (IRR) of 32 percent. A sensitivity analysis has been carried out as a means of assessing the risk profile of the variables used in the estimation of the NPV and IRR, demonstrating value for money for all scenarios.

## B. Fiduciary

### (i) Financial Management

78. **The World Bank conducted a Financial Management (FM) assessment to determine the adequacy of the financial management arrangements of the Finance Unit of the PCU at MLHCP.** The assessment was conducted in accordance with the Financial Management Manual effective March 1, 2010, as last revised on February 10, 2017. The FM assessment concluded that with the implementation of agreed-upon actions, the financial management arrangements meet the minimum requirements consistent with the World Bank's Financial Management guideline and the World Bank's policy, and directive for investment project financing.
79. **The Finance Unit of the PCU will provide fiduciary services to the project.** Under the direction and supervision of the Project Coordinator, the PCU financial management team that will comprise of two officers, (the Financial Management Specialist and an Assistant), will be responsible for all day-to-day financial management functions of the project. The Financial Management Specialist will be dedicated to the project.
80. **The PCU will have satisfactory planning and budgeting, accounting, internal controls, financial reporting, and external auditing processes in place that will support the effective and efficient utilization of resources for the project.** The related operational costs of maintaining the staff during the life of the project, including computer hardware, stationery, submitting withdrawal applications electronically, and printing project FM reports will form part of the costs that the project shall bear as part of project management costs.
81. **The PCU will open a US\$ denominated designated account at a Commercial Bank approved by the World Bank.** The project will use report-based disbursements through the submission of quarterly Interim Financial Report (IFRs) on the sources and uses of project funds. A forecast of the first six months expenditures will form the basis for the initial withdrawal of funds from the Grant, and subsequent withdrawals will be based on the net cash requirements.



82. **The project will follow a cash basis of accounting and financial reporting and will submit, within 45 days of each GoSL fiscal quarter, quarterly IFRs of the project activities.** At a minimum, the constituents of the IFRs will be: (a) A statement of sources and uses of funds for the reported quarter and cumulative period from project inception, reconciled to opening and closing bank balances, (b) A statement of uses of funds (expenditures) by project activity/component and by expenditure categories, comparing actual expenditures against budget, with explanations for significant variances for both the quarter and cumulative period, and (c) DA Reconciliation Statement.
83. **The annual audited financial statements of the project shall be submitted to IDA within six months of the end of the GoSL's fiscal year (i.e., by June 30 each year).** The external auditors will conduct the audits on the project financial statements on terms of reference as agreed with the World Bank.
84. **Based on the assessment conducted, the overall FM risks were rated as 'High' and is considered to be 'Substantial' after implementation of mitigation measures.** If the planned risk mitigation measures are properly implemented, the residual FM risk is anticipated to be rated as 'Substantial.' A detailed description of the FM assessment is included in Annex 1.

#### **(ii) Procurement**

85. **Procurement procedures.** Procurement under the proposed project will be carried out in accordance with the World Bank 'Procurement Regulations for Investment Project Financing Borrowers' (dated July 2016 and revised in November 2017, August 2018 and November 2020), the 'Guidelines on Preventing and Combating Fraud and Corruption in Projects Financed by IBRD Loans and IDA Credits and Grants' (dated July 1, 2016) and beneficiary disclosure requirements, as well as other provisions stipulated in the Project Legal Agreements. Furthermore, the Sierra Leone 'National Public Procurement Act of 2016' will apply for tenders approaching national market taking into considerations the requirements of Clauses 5.3, 5.4, 5.5 and 5.6 of the Procurement Regulations for Investment Project Financing (IPF) Borrowers.
86. **Project Procurement Strategy for Development (PPSD).** A draft PPSD has been prepared by MLHCP describing the overall project operational context, market situations, implementing agencies' capacities and identifies potential procurement risks and mitigation measures to achieve value for money and the PDO. The PPSD will be finalized prior to Board approval and will also set out the selection methods to be followed in the procurement of goods, works, and non-consulting and consulting services financed under the project. The underlying procurement plan will be updated at least annually or as required to reflect the actual project implementation needs and improvements in institutional capacity.
87. **Systematic Tracking of Exchanges in Procurement (STEP).** The project will use the World Bank's STEP system, an online planning and tracking system that will provide data on procurement activities, establish benchmarks, monitor delays, and measure procurement performance. Use of STEP is mandatory for all procurement transactions subject to post and prior review under the project.
88. **Staffing.** The project shall recruit a procurement specialist with required qualification and experience acceptable to the World Bank to perform procurement operations and shall report to the project coordinator. A procurement



assistant will be hired as well.

89. **Procurement risk.** The overall procurement risk associated with the Project is *High* and the residual risk after implementation of mitigation measures is *Substantial*; this rating is due to: (a) the limited procurement capacity of the implementing agency; (b) limited knowledge in the World Bank's Procurement Regulations and use of STEP; (c) inefficiencies and delays in procurement process; (d) insufficient competition in procurement, and (e) weak complaint redress system. To address these risks and weaknesses, mitigation measures and concrete action plans have been agreed with MLHCP, including, inter alia: (a) recruitment of procurement staff, (b) capacity building through regular procurement clinics and trainings; (c) aggregation of small packages when feasible; (d) sensitization of private sectors to bid for public tenders; and (e) biannual reporting on all complaints received and actions taken.

### C. Legal Operational Policies

	Triggered?
Projects on International Waterways OP 7.50	No
Projects in Disputed Areas OP 7.60	No

### D. Environmental and Social

90. **Environmental and Social (E&S) risks and impacts.** The project overall environmental risks and impacts are anticipated to be *Substantial* due to a result of the nature and scale of the activities, the sensitivity of the environmental receptors and the ease of implementing and managing the potential risks. The E&S impacts of the planned rehabilitation/ new construction to support the establishment of land offices under component 1 are localized, reversible and can be readily mitigated by established standard measures. The main E&S concerns are associated with (i) land registration risks related to conflicting property boundaries between third parties; reveal of overlap of rights and generate claims; land boundary contestations between village lands or neighboring communities; and encroachments on the boundaries between uses and vocations (housing areas, agricultural areas, pastoral areas, etc.); (ii) occupational health and safety risks/impacts relating to incidents, accidents, or fatalities during rehabilitation or construction works, (there is also the risk of exposure of workers and the community to asbestos if old structures with asbestos containing materials are demolished or rehabilitated); (iii) labor and employment issues; (iv) air, water and soil pollution by sediments from excavated and exposed surfaces, construction wastes and operation of equipment; (v) elevated noise levels; (vi) community health and safety risks, including risk of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), ; (vii) involuntary displacement and land acquisition issues if project is not carried out on public property, and where squatters are involved; and (viii) threat to biodiversity, wetlands and natural habitats from water pollution. To minimize environmental risks and exposure of workers to asbestos, the project shall prioritize new construction over rehabilitation or demolition of an old structure for construction of the Land Administration Building. The project shall also prioritize construction on government-owned land.
91. **Environmental and Social Standards (ESS) applicable to the Project:** The project is being prepared and will be implemented in compliance with the World Bank ESF and its ESS. The relevant ESS that apply to the project are: ESS1 on the Assessment and Management of Environmental and Social Risks and Impacts, ESS2 on Labor and



Working Conditions, ESS3 on Resource Efficiency and Pollution Prevention and Management, ESS4 on Community Health and Safety, ESS5 on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, ESS6 on Biodiversity Conservation and Sustainable Management of Living Natural Resources, ESS8 on Cultural Heritage, and ESS10 on Stakeholder Engagement and Information Disclosure. To comply with these standards, the following ESF instruments have been prepared, disclosed, consulted and adopted in-country prior to appraisal: i) Environmental and Social Management Framework (ESMF); (ii)Labor Management Procedure (LMP); iii) Resettlement Policy Framework (RPF), iv) SEP; and v) Environmental and Social Commitment Plan. A standalone Gender and Gender Based Violence (GBV) Assessment have been prepared and will inform the project mainstreaming measures and a GBV – SEA/SH - Action Plan, expected prior to World Bank Board approval. The preparation of the ESF instruments included a stakeholder consultative process. Furthermore, these ESF instruments will be included in the PIM. Engineering designs will be informed by the ESF instruments and vice versa. Risk mitigation measures have been described in the ESMF and will be detailed in the site-specific Environmental and Social Management Plans (ESMPs), when project details (information about the location of office building in Freetown and the provincial land offices, the nature of intervention, beneficiaries, and sites) become available. At this stage in project development, no activity (as described) is expected to be of high risk or requires an Environmental and Social Impact Assessment. The ESMF includes measures to prevent acquisition of or encroachment on protected and sensitive ecosystem.

92. **The environmental risk of this project is rated as Moderate.** For the construction of the land administration buildings in Freetown and the Regional Headquarters, the project shall prioritize (1) construction on 'new' unoccupied land over (2) demolition of an existing structure for the construction of a new one. If the project proceeds with option 2, due to land unavailability, an asbestos audit shall be conducted on the facility to be demolished. If asbestos containing materials are discovered on that facility, an Asbestos Management Plan (AMP) will be prepared and strictly implemented. The asbestos assessment and AMP preparation will be done by an accredited or certified firm or individual with a wealth of experience in handling asbestos materials. The AMP, including the management and disposal of the asbestos materials shall be approved by the EPA or appropriate authority. Demolition of the structure shall not commence until the AMP has been prepared and disclosed by the Recipient following World Bank clearance. To minimize the E&S footprint, there is a preference for construction or rehabilitation of structures within district administration facilities. A location analysis is being conducted but results are not available at the time of writing. Options would be assessed and weighed based on environmental and social risks as well as cost implications. Once the sites have been selected and the nature of the intervention decided, the necessary site plans, architectural drawings, building approvals, etc., will be prepared.
93. **The social risk of this project is rated as Substantial** considering the potential social impacts under Components 1, 2 and 3. Land acquisition, restrictions on land use and involuntary resettlement risk may occur under Component 1 and 2 where lands may be acquired for the construction/ rehabilitation of the land offices at the headquarters and in the provinces and the establishment of the CORS network. The exact locations for these works are undetermined at this moment. These risks will be covered under ESS5. The project has prepared and disclosed an RPF detailing the specific processes that will guide land acquisition in general terms. Should there be need for displacement, specific Resettlement Action Plans will be prepared proportionately based on the identified risks during implementation. Compensation will be paid in a timely manner at full replacement cost before civil works commence. The potential financing of resettlement compensation costs from project funds is subject to WB approval during implementation and would require a project restructuring.



94. **Under component 3, the demarcation and recording of land rights could lead to** (i) conflicting property boundaries between third parties; (ii) reveal an overlap of rights and generate claims; (iii) land boundary contestations between village lands or neighboring communities; and (iv) encroachments on the boundaries between uses and vocations (housing areas, agricultural areas, pastoral areas, etc.). These risks require an adequate GRM and Alternative Dispute Resolution (ADR) processes alongside participatory survey and recording activities with landholders, land users, neighbors, community groups and land committees to ensure transparency in the demarcation and registration of customary lands. These types of risks will be handled as prescribed under ESS1 (b)(iv) and its footnote 29.
95. **Changes in legal and institutional practices envisaged under this project will require cooperation among numerous stakeholders, including national and local government, customary institutions, and communities with limited social, economic, and political empowerment.** This will require significant coordination and consultation with different stakeholders, ensuring differentiated measures for effective participation of local communities, disadvantaged or vulnerable groups as well as ensuring tenure security for women. Local elites and private sector actors benefitting from the status quo may attempt to undermine reforms. Distrust between government and customary institutions could be elevated. The project builds into the design of component 1, a public awareness and sensitization program. The project has also prepared SEP which has been disclosed, consulted and adopted prior to appraisal. A project wide GRM and ADR processes to resolve anticipated land related complaints will be established and made functional 60 days after project effectiveness.
96. **The project is expected to recruit substantial staffing (numbers undetermined at the moment) for the survey and recording of land rights.** In addition, local construction companies will be hired to carry out construction/rehabilitation works. Staffing will include direct workers, contracted workers, and primary supply workers. While jobs and income are expected to be generated, the project will need to promote sound labor management and relations by treating workers fairly and providing safe and healthy working conditions. Consistent with ESS2, the project has prepared an LMP which has been prepared, disclosed, consulted and adopted prior to appraisal.
97. **The risk of Sexual Exploitation and Abuse and Sexual Harassment is reassessed at appraisal to be Moderate using the World Bank SEA/SH risk assessment tool.** This takes into consideration construction-related SEA/SH risks as well as land registration related SEA/SH risk. Given that some of the investment will be implemented in poor communities with increased income from construction/rehabilitation work, coupled with search for employment and procurement opportunities, the risk of SEA/SH may be heightened. SEA/SH could also occur in the process of land registration where project actors with power over the registration process could exploit vulnerable beneficiaries. Similarly, project actors may engage directly with beneficiaries in land mapping and assessment with limited supervision, SEA/SH could occur. The project has conducted a Gender and GBV (SEA/SH) risk assessment and will develop a GBV Action Plan prior to World Bank Board approval. Details of the action plan include service provider mapping, GBV sensitive channels in the Grievance Mechanism, contractor code of conduct, worker training, community sensitization and an Accountability and Response Framework as part of the contractor ESMP for SEA/SH response. The GBV action plan will extend to potential SEA/SH risks in the context of land titling.
98. **E&S Implementation, Monitoring and Reporting.** The project will be implemented by MLHCP. MLHCP has not yet implemented any World Bank financed projects but has worked with UNFAO to pilot recording of customary land rights that includes extensive community engagement. Capacity building and training will be necessary



throughout the life of the project. MLHCP will establish a PCU and will include a Stakeholder Engagement/Communications and Community Liaison Specialist, Social Safeguards and Gender Specialist, and an Environmental Safeguards Specialist as needed. Responsibility and oversight of the project's overall compliance with national and World Bank ESS will rest with the environmental and social safeguards specialists who will be in charge of project safeguards preparation, implementation, monitoring and reporting.

99. **Citizen Engagement.** The project provides multiple avenues for citizen engagement throughout the lifecycle of the project. Citizen feedback will be obtained during sensitization campaigns under Component 1. Comments, ideas, and recommendations received through various stakeholder consultations – at the community level, with disadvantaged and vulnerable groups, and with civil society – will be used to inform project design and implementation on a regular basis. Queries, clarifications, or complaints about the project received through the project GRM will be responded to and resolved efficiently and effectively. Under component 3, awareness raising activities will be more specific and focus on the field work activities related to land registration. The steps for registering land will include several citizen engagement mechanisms: (1) an initial awareness raising stage to introduce the activities; (2) mapping of boundaries through participatory processes with all relevant stakeholders (landholders, land users, neighbors, etc.) that will allow for immediate feedback; and (3) an objections and corrections phase during which beneficiaries can raise their concerns with regard to boundaries or ownership information. The exact design of these mechanisms will build on pilot activities foreseen under component 3 to ensure the mechanisms are aligned to specific circumstances in the intervention areas. The project will administer a customer feedback survey on the land administration system. Finally, CSOs have informed project design and will continue to play a role through the TWG during implementation, which will inter alia include monitoring of project activities. Citizen engagement in the roject will be tracked through one beneficiary feedback indicator related to the project GRM. Project activities will be adjusted if and as needed based on the feedback obtained.
100. **Gender.** All activities will be designed in line with the VGGT and NLP, which are promoting women's land rights. A gender assessment was carried out in February 2022 as part of project preparation.<sup>78</sup> Under component 1, the project will ensure that specific messages are drafted for the nation-wide sensitization campaign to inform men and women about the land rights of women as outlined in the NLP and the CLRB once it is passed. A gender strategy for land administration will be supported under component 1 to ensure that women's land rights issues are considered throughout the whole land administration system. Further, legal support activities under component 1 will include a comprehensive review of existing and proposed laws and regulations to assess how they may be revised to strengthen women's rights to land. Actual drafting of new legal instruments will be based on this assessment to ensure that any future laws would be strengthening women's land rights and improving women's legal decision-making powers regarding land. The land information system to be established under component 2 will ensure that sex-disaggregated land ownership data can be recorded, stored, and analyzed, addressing data gaps with regard to women's land rights. Demarcation and registration activities of freehold and community/family tenure under component 3 will ensure women's participation in all steps required during the demarcation of boundaries and registration of owners. Subsequent field work will ensure that women's names are registered to strengthen future decision-making of women regarding land – single, jointly with husbands, or as part of families to address the low levels of registered women's land rights. Local land related decision-making bodies will be established in line with the NLP or CLRB once it is passed. If the CLRB is not passed, the project will strengthen existing land related bodies and ensure these adhere to the government's minimum 30 percent women's quota to address gaps related to women's decision-making related to land issues. The pilot experiences

<sup>78</sup> Ministry of Lands, Housing and Country Planning (2022): Sierra Leone Land Administration Project: Gender Assessment.



of MLHCP, CSOs and UNFAO in this regard will informed details activity designs.

## 5. GRIEVANCE REDRESS SERVICES

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

## 6. KEY RISKS

102. The overall risk rating of the project is considered as *Substantial*. A key risk at this stage is the uncertainty regarding *sector strategies and policies*, in particular the passage of the CLRB and NLCB. While the project does not depend on the passage of these laws, they would make implementation more efficient. Another key risk is related to *institutional capacity* since this will be the first large-scale land sector project implemented by MLHCP. Generally, the institutional capacity is low due to years of absence of trainings and capacity building in the sector. The low capacities are also increasing the *fiduciary risk* of the project. The *E&S risks* are substantial due to the low level of capacities to deal with the associated environmental and social risks. The following highlights the key risks that could affect the project, describing the risks and mitigation measures. Risk ratings are based on the residual risk that is anticipated subject to successful implementation of mitigation measures, except for the E&S risk rating, which is presented as the current risk.
103. **Sector Strategies and Policies:** *Substantial*. Adoption of the NLP in 2015 and submission of two new land laws to the Parliament in 2021 has been a positive step in improving land administration. World Bank reviews have demonstrated that the NLP and draft laws are well-aligned with international good practices, i.e., the VGGT. However, there remains a risk of the two new land laws not being passed by Parliament, which would affect Project implementation. The World Bank will closely monitor progress with the proposed new land laws and an ongoing Development Policy Operation<sup>79</sup> includes a prior action on the appointment of the NLCB Board, which will mitigate the risks. Project design will be adapted as needed in case the laws do not pass. Main project activities will be able to commence under the current legal and institutional framework, if needed. The current risk is considered to be *High*, and the residual risk is considered to be *Substantial* if the land laws are passed.
104. **Institutional Capacity for Implementation and Sustainability:** *Substantial*. Capacity within MLHCP, and other public sector entities, is low. The NLP calls for the shifting of land administration responsibilities among several entities. This project is the first World Bank financed project to be implemented by MLHCP, which has yet to be

<sup>79</sup> Sierra Leone Second Inclusive and Sustainable Development Policy Financing (P178321)



provided adequate human and financial resources to implement the NLP. Further, there are concerns about the land registration functions being transferred from OARG and moved to the proposed Lands Commission despite consultations with OARG during the NLCP drafting process. A technical working group with OARG and MHLCP has been established to address these concerns. However, the project has built in several risk mitigation measures as core project activities: Significant capacity building activities are to be financed under component 1. The current risk is rated as *High* and will be reassessed during project implementation to assess the residual risk, which currently rated as *Substantial*.

105. **Fiduciary:** *Substantial*. The overall FM risk for the project at preparation is assessed as *High* since this project is the first World Bank financed project implemented by MHLCP, but with the expected risk mitigation measures when adequately implemented (such as hiring of qualified FM staff as part of the PCU), the residual FM risk is rated as *Substantial*. The overall procurement risk associated with the project is *High*. Limited procurement capacity and past experiences under other projects with delays as well as insufficient competition in procurement, the risk is rated as *High* but if mitigation measures (such as hiring of qualified PCU fiduciary staff and regular capacity building of PCU fiduciary staff in relevant World Bank processes and systems) are adhered to, the residual risk is *Substantial*.
106. **Environment and Social:** *Substantial*. Rehabilitation/new constructions to support the establishment of land offices at the Headquarters (Freetown) and the district level poses some social and environmental risks. Potential for land acquisition and displacement associated with the civil works is envisaged, but the exact locations are undetermined at this moment. These activities could lead to potential social impacts related to future land acquisition. Generally, project activities could (i) affect property boundaries between third parties; (ii) reveal an overlap of rights and generate claims; (iii) reveal boundary problems between village lands or neighboring communities; (iv) reveal encroachments on the boundaries between uses and vocations (housing areas, agricultural areas, pastoral areas, etc.), with the result that there is a risk of losing land that will generate economic or physical displacement of the people affected. Recording, demarcation, and registration of land rights under component 3 may affect land rights especially among vulnerable groups due to conflicting claims or disputes. Without adequate mitigation measures, this risk is *High*. To mitigate these risks, the project will facilitate coordination and consultation with different stakeholders, ensuring differentiated measures for effective participation of local communities, disadvantaged or vulnerable groups are in place. Three E&S officers will be part of the PCU to mitigate E&S related risks. A GRM will be established to record, track, and resolve all issues reported regarding project activities.

**7. RESULTS FRAMEWORK AND MONITORING****Results Framework****COUNTRY: Sierra Leone****Sierra Leone Land Administration Project****Project Development Objectives(s)**

The Project Development Objective is to establish an efficient and accessible land administration system.

**Project Development Objective Indicators**

Indicator Name	PBC	Baseline	Intermediate Targets		End Target
			1	2	
<b>Establishment of a land administration system</b>					
People with use or ownership rights recorded (Number)		0.00	100,000.00	300,000.00	500,000.00
Women with use or ownership rights recorded (Number)		0.00	50,000.00	150,000.00	250,000.00
<b>Efficiency of the land administration system</b>					
Time to complete the registration of a transaction of a land parcel in the land administration system (Days)		56.00	56.00	45.00	35.00
<b>Accessibility of the land administration system</b>					
Transactions registered (Number)		0.00	0.00	18,000.00	36,000.00
Transactions registered to women (Percentage)		0.00	0.00	30.00	30.00



### Intermediate Results Indicators by Components

Indicator Name	PBC	Baseline	Intermediate Targets				End Target
			1	2	3	4	
<b>Institutional Development and Legal Reform</b>							
Strategy and business plan for a self-funding Land Administration System established (Yes/No)		No	No	Yes			Yes
Land sector professionals trained (Number)		0.00	50.00	150.00			300.00
Female land sector professionals trained (Number)		0.00	25.00	75.00			150.00
Land laws submitted to Parliament (Number)		0.00	0.00	1.00			2.00
Land offices built or renovated at the central and provincial level that incorporate resilient design principles, are staffed and operational (Number)		0.00	0.00	0.00	2.00	4.00	5.00
<b>Land Information System Development</b>							
Re-engineered land administration business processes reflected in LIS design (Yes/No)		No	Yes	Yes			Yes
Digital land information system is functional with ability to generate sex-disaggregate data (Yes/No)		No	No	Yes			Yes



Indicator Name	PBC	Baseline	Intermediate Targets				End Target
			1	2	3	4	
Land records digitized (Number)	0.00	50,000.00	125,000.00				200,000.00
Continuously Operating Reference Stations (CORS) installed and operational (Number)	0.00	2.00	10.00				10.00
<b>Recording and Registration of Land Tenure Rights</b>							
Manual for customary land rights registration developed (Yes/No)	No	Yes	Yes				Yes
Chiefdom Land Committees and Town or Village Land Committees in project area with at least 30% female membership (Percentage)	0.00	0.00	75.00				100.00
<b>Project Management</b>							
Grievances addressed within the time specified in the Grievance Redress Mechanism (Percentage)	0.00	85.00	85.00				85.00
Regular Project Steering Committee and Project Technical Committee meetings held (Yes/No)	No	Yes	Yes				Yes



## Monitoring &amp; Evaluation Plan: PDO Indicators

Indicator Name	Definition/Description	Frequency	Datasource	Methodology for Data Collection	Responsibility for Data Collection
People with use or ownership rights recorded	The indicator will measure the number of people whose land rights will be recorded and/or registered as a result of the project - either individually, jointly with spouses/partners, or as part of a family. This will include land records that have been corrected and it will include properties that are registered for the first time.	Bi-annual	Data will be recorded in the field with mobile devices and will feed into an interim database if needed and the LIS once established.	Analysis of land registration data received by field teams through mobile devices, interim database and LIS (once established).	Field teams, PCU M&E Specialist and MLHCP ICT Specialist
Women with use or ownership rights recorded	The indicator will measure the number of women whose land rights will be recorded and/or registered as a result of the project - either individually, jointly with spouses/partners, or as part of a family.	Same as parent indicator	Same as parent indicator	Same as parent indicator	Same as parent indicator
Time to complete the registration of a transaction of a land parcel in the land administration system	This indicator measures the time it takes within the land administration system to register a land transaction. The indicator will only measure the time that	Bi-annual. This indicator will be measured once the LIS is in place	LIS data reports	The LIS will include a reporting function that enables the client to measure the time required to record a land transaction.	MLHCP's ICT Specialist will extract information from LIS in close coordination with the PCU M&E Specialist.



	government staff spend on a transaction. Delays caused by customers (i.e. in case of incomplete documents being submitted) will not be measured.	and functional. Due to several steps required to establish the LIS, it is anticipated that this indicator will not show significant results before the third year of project implementation.			
Transactions registered	The indicator will measure the number of transactions registered in the land information system, which will provide information on how many users are using the system and whether there are any increases of usage of the system over time	Bi-annual. This indicator will be measured once the LIS is in place and functional. Due to several steps required to establish the	LIS data reports	The LIS will include a reporting function that enables the client to report on the number of land transactions.	MLHCP's ICT Specialist will extract information from LIS in close coordination with the PCU M&E Specialist.



		LIS, it is anticipated that this indicator will not be reported upon before the third year of project implementation.			
Transactions registered to women	This sub-indicator measures the percentage of transactions processed by the system that are registered to women (individually or jointly)	Same as parent indicator	Same as parent indicator	The LIS will include a reporting function that enables the client to report on the how many transactions are registered to men, women or joint owners	Same as parent indicator

**Monitoring & Evaluation Plan: Intermediate Results Indicators**

Indicator Name	Definition/Description	Frequency	Datasource	Methodology for Data Collection	Responsibility for Data Collection
Strategy and business plan for a self-funding Land Administration System established	The indicator will measure whether a strategy and business plan have been developed with sufficient information and plans for	Bi-annual	Strategy and business plan	Review of documents referenced above	PCU M&E Specialist



	financial sustainability of land sector operations.				
Land sector professionals trained	The indicator will measure the number of MLHCP, OARG and other government staff as well as private sector land specialists and CSO staff that are trained in surveying, land registration, land dispute resolution, etc. as well as administrative disciplines like general office administration and management, procurement, M&E, etc.	Bi-annual	Training reports, certificates, test results	Review of documents referenced above	PCU Training Coordinator and PCU M&E Specialist
Female land sector professionals trained	This sub-indicator measures how many women have been trained as a result of the Project.	Bi-annual	Training reports, certificates, test results	Review of documents referenced above	PCU Training Coordinator and PCU M&E Specialist
Land laws submitted to Parliament	The indicator will measure the number of land laws submitted to Parliament, e.g. Land Surveying Bill and Land Title Registration Bill (the legal assessment will determine which bills the project would prioritize and measure)	Bi-annual	Draft Bills	Review of documented referenced above	PCU M&E Specialist



Land offices built or renovated at the central and provincial level that incorporate resilient design principles, are staffed and operational	The indicator will measure the number of land offices renovated or constructed based on climate resilient designs, that are staffed in line with respective guidelines, and operational with required furniture and equipment	Bi-annual	Progress reports; contractor reports	Review of referenced reports and field visits as feasible during COVID19	M&E Specialist
Re-engineered land administration business processes reflected in LIS design	The indicator will measure whether the LIS design is developed and whether it has taken re-engineered land administration procedures into consideration.	Bi-Annual	LIS specifications /design & business process re-engineering report	Review of reports mentioned above	MLHCP ICT Officer & PCU M&E Specialist
Digital land information system is functional with ability to generate sex-disaggregate data	The indicator will measure whether an LIS has been designed, developed, tested and whether it is functional (at least at the HQ level). A key consideration will be whether the LIS can produce sex-disaggregated reports.	Bi-annual	LIS development progress reports; LIS reports	Review of documents referenced above	MLHCP ICT Officer & PCU M&E Specialist
Land records digitized	The indicator will measure how many relevant land records (deeds, maps, etc.) have been digitized for storage in the LIS	Bi-annual	Digitization program progress reports	Review of documents referenced above	MLHCP ICT Officer and PCU M&E Specialist



Continuously Operating Reference Stations (CORS) installed and operational	The indicator will measure how many CORS have been installed and made functional to form the geodetic network.	Bi-annual	CORS network progress reports	Review of the documents referenced above	PCU M&E Specialist
Manual for customary land rights registration developed	The indicator measures whether a customary land rights registration manual has been developed - this will be a result of the pilot activities and existing experiences.	Bi-Annual	Customary Land Rights Registration Manual	Review of document referenced above	PCU M&E Officer
Chiefdom Land Committees and Town or Village Land Committees in project area with at least 30% female membership	The indicator will measure how many local land committees have been established in accordance with the legal gender provisions.	Bi-annual	Field reports on the establishment of the referenced committees	Review of documents referenced above	PCU M&E Specialist
Grievances addressed within the time specified in the Grievance Redress Mechanism	The indicator will measure how many of the reported cases during project implementation have been addressed with the help of the GRM.	Bi-annual	GRM reports	Review of documents referenced above	PCU Social & Gender Specialist and PCU M&E Specialist
Regular Project Steering Committee and Project Technical Committee meetings held	The indicator will measure whether the project's PTC and PSC are meeting regularly to inform project implementation and provide advice on project activities,	Bi-annual	PTC and PSC meeting minutes	Review of documents referenced above	PCU M&E Specialist



	which is crucial due to the multi-sectoral nature of the activities.				
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**ANNEX 1: Implementation Arrangements and Support Plan***(i) Project institutional and implementation arrangements*

1. **MLHCP.** It is the leading institution responsible for land related matters in the country, such as land acquisition and transfer, land ownership and use, and national development in a planning capacity. It provides advisory services to the public on land matters as well as physical planning. There are four divisions of MLHCP: Administration; Housing; Surveys and Lands; and Country Planning. The Surveys and Lands division has the mandate to develop State topography, in particular: to provide cartographic and topographic data; implement a standardized national coordinate system; survey all lands (including urban, sub-urban, and rural territories); demarcate private and state land boundaries; compile and maintain a comprehensive record of lands in the country; map and provide relevant statistics on total land parcel mapped and unmapped nationwide. In the course of implementing its functions the Surveys and Lands Division verifies the accuracy of surveying computations submitted by Licensed Surveyors for private land and by Government Surveyors for State Lands, however the Division is not empowered to verify ownership of land. The MLHCP will host the PCU, will chair the PTC, and will be a member of the PSC (chaired by MOF).
2. **OARG.** OARG has its headquarters in Freetown with branch offices in Bo, Makeni and Kenema, and is mandated to ensure an efficient and effective administration of and registration of entities such as business registration, land transactions, industrial property, marriages, and administration of the estates of deceased persons as mandated by law. The OARG is supervised by the Office of the Attorney General and Ministry of Justice. Following the General Registration Act of 1960 (Cap 256), the OARG is responsible for registering land instruments (survey plans and conveyances), however registration by the OARG does not provide the security of tenure and cannot be used as legal proof of land rights. Such registry of deeds or instruments is only considered as an evidence that a transaction has taken place, therefore courts have the discretion to determine who has rights to land. The OARG does not maintain a cadaster, therefore boundaries, location and rights are not recorded and the OARG relies heavily on the data provided by MLHCP, such as cadastre information from all survey plans that have been signed and sent on a weekly basis ("weekly returns"). An attempt has been made to automate the link between OARG and MLHCP for land document transfer, however it has ended without any meaningful results. The OARG is financed from the budget funds as it is not self-sustainable and could not cover its operating costs through fee collection as such fees only cover 50 percent of the total registry operating cost. This is due to the following reasons: property owners do not declare the true value of their property due to high taxes; over 80 percent of the cost of land transaction cost is paid to the private surveyors and lawyers, which discourages most people from utilizing the official systems and probably results in far less revenue being generated to government than if much lower costs were involved. Slow pace of government decentralization also impedes the rate and speed of registering property. The Land Commission Bill that is pending Parliament approval would move OARG's land registration functions from to the proposed Land Commission. The OARG will be a member of the PSC and the PTC.
3. **Local Councils.** Sierra Leone is administratively divided into four provinces, which are subdivided into 16 districts and 149 chiefdoms. Chiefdoms are administrative units that are governed by Paramount Chiefs and their chiefdom councils. The Local Government Act 2004 established Local Councils as the highest political authority within a locality with legislative and executive powers. These Councils have been assigned a range of general and specific duties which ministries, departments and agencies used to carry out. Some of the general responsibilities include



the development, improvement and management of human settlements and the environment in the locality and the provision of basic infrastructure, works and services. Many of the mandates of the Councils are related to land and they will therefore play a key role during the implementation of Components 1 and 3.

4. **Chiefdom Councils.** Land tenure in the provinces under customary law is vested in the paramount chief as trustee for the community. There are several layers of tenure or vested interests shared between the paramount chief (s), the family, and the individual. Most of the land under customary tenure is held by extended families, the members of which have access and use rights. Anyone who is not entitled by birth to land in the provinces can only occupy land in the provinces with the consent of the Chiefdom Council. The proposed CLRB and NLCB would establish new local land committees at the village and chiefdom level. Chiefdom Councils will play a key role during the implementation of Component 3.
5. **Courts and tradition rulers.** Customary tenure operates in the provinces where Paramount Chiefs apply rules of particular ethnic or tribal groupings that govern the control, management, use and transfer of land. In the Freetown area, land is governed by principles of common law and statutes with individual freehold rights of exclusivity, use and transfer. Following the structure of the tenure system, there is dualistic system of land disputes resolution. Under customary tenure, land-related disputes are mainly resolved by traditional authorities, whereas courts play the main dispute resolution role under the formal system. They will play a key role during the implementation of Component 3.

*(ii) financial management*

6. **A financial management assessment of the Finance Unit of the PCU of the MLHCP was conducted** in accordance with Financial Management Manual effective on March 1, 2010, and as last revised on February 10, 2017.
7. **The objective of the assessment was to determine whether the PCU has acceptable FM arrangements.** The arrangements include the PCU's system of planning and budgeting, accounting, internal controls, funds flow, financial reporting, and auditing. The entity's arrangements are acceptable if they are considered capable of recording correctly all budgets, transactions, and balances, supporting the preparation of regular and reliable financial statements, safeguarding the entity's assets, and are subject to auditing arrangements acceptable to the World Bank. The assessment was conducted in accordance with the Financial Management Manual effective March 1, 2010, as last revised on February 10, 2017.
8. **The overall FM risk for the project in respect of the proposed FM arrangements is assessed as High,** but with the expected risk mitigation measures when adequately implemented, the residual FM risk is rated as Substantial.
9. **Country Issues:** Country issues that potentially impact project financial management arise from the public financial management (PFM) environment. Sierra Leone's PFM arrangements were assessed in 2018 using the Public Expenditure Financial Accountability PFM Performance Measurement Framework. According to the assessment, Sierra Leone has maintained its progress since PFM reforms started with the Institutional Reform and Capacity Building Project in 2004. The weaknesses in some areas impact on fiscal discipline (the ability to stay on track), on strategic allocation of resources (alignment with the Agenda for Prosperity), and on efficient delivery of services. The Public Financial Management Reform Strategy 2018-2021 seeks to improve efficiency, effectiveness and transparency of revenue generation and expenditure management and provide the basis for macro stability,



strategic allocation of resources, delivery of vital goods and services to the country and strengthen accountability between the State and citizens.

10. **The FM risk before considering the mitigating measures is “High” and the residual risk is “Substantial” mainly due to:** i) No prior experience of MLHCP with the World Bank’s financial management procedures, ii) limited capacity to meet the Project’s financial management requirements, iii) movement restrictions preventing the World Bank team to perform physical visits, iv) Overall weaknesses and shortcomings in the control environment; v) MLHCP’s proposed accounting system is not capable of generating financial report in accordance with the World Bank requirements. However, with the mitigation measures in place, the residual risk becomes “Substantial”. The following measures are proposed and agreed with MLHCP to be implemented prior to the project effectiveness date: (i) FM functions will be centralized within the PCU’s authority with FM consisting of qualified Financial Officers, (FM Specialist and FM Assistant); ii) Provision of specific training in FM & disbursement for project FM staff; iii) Direct payment will be used for equipment supplies, besides the opening of a designated account in US\$ in a bank acceptable to IDA; and iv) The FM chapter of the PIM documents the project’s implementation of internal control functions and describes the responsibilities of the PCU’s FM members with authorities and execution processes.
11. **Planning and Budgeting.** The Project Annual Work Plans and Budgets (AWPB) will be prepared and approved based on the policy guidelines and strategy planning as will be laid-out in the PIM and consistent with the provisions of the Public Financial Management Act 2016. The budget will be activity based and in line with the cost tables of the Project. The AWPB is expected to be prepared in a participatory way and will be approved before each new financial year begins. Actual expenditure, including a comparison to budget, will be monitored during Project implementation using unaudited interim financial reports. The PCU will ensure timely preparation, review, consolidation, and approval of the annual work program budget.
12. **Reporting:** The Finance Unit of the PCU will be responsible for the preparation and submission of quarterly IFRs for the project, to be submitted within 45 days after the end of the quarter to which they relate. It will also be responsible for the preparation of the annual financial statements for the fiscal period to which they relate and having them audited. The information in these reports will be clearly reconciled to the trial balance/general ledger reports from the accounting systems used for the Project.
13. **The following quarterly IFRs and annual Financial Report will be produced:**
  - A statement of sources and uses of funds for the reported quarter and cumulative period from project inception, reconciled to opening and closing bank balances.
  - A statement of uses of funds (expenditures) by project activity/component and expenditure category, comparing actual expenditures against budget, with explanations for significant variances for both the quarter and cumulative period.
  - The Financing Agreement will require the submission of audited financial statements for the overall project to the World Bank within six months after the end of each financial year. These Financial Statements will comprise:
  - A Statement of Cash Receipts and Payments, which recognizes all cash receipts, cash payments, and cash balances controlled by the entities responsible for project implementation.
14. **Accounting Policies Adopted and Explanatory Notes.** The explanatory notes should be presented in a systematic manner with items on the Statement of Cash Receipts and Payments being cross-referenced to any related



information in the notes. Examples of this information include a summary of fixed assets by category of assets and a summary of Withdrawal Schedule, listing individual withdrawal applications; and a Management Assertion that IDA funds have been expended in accordance with the intended purposes as specified in the relevant World Bank legal agreement. Indicative formats of these statements will be developed in accordance with fiduciary requirements and agreed with the World Bank Financial Management Specialist.

15. **Internal Audit and Control.** The Internal Auditor dedicated to the PCU will carry out periodic internal audit reviews of activities carried out in the implementation of the project and share copies of their report with the Bank. On a quarterly basis. Segregation of duties, and full compliance with the provisions of the PIM, especially as pertaining to internal control aspects, will remain a key ingredient in the implementation of the expenditure processing activities at the Finance Unit of the PCU and the implementing and executing agencies during the life of the Project.
16. **Governance and Anti-Corruption.** The Bank's Anti-Corruption Guidelines (*"Guidelines on Preventing and Combating Fraud and Corruption in Projects Financed by IBRD Loans and IDA Credits and Grants"*, dated October 15, 2006, and revised in January 2011) apply to this project. Sections of these guidelines, especially those relating conflict of interest, procurement and contract administration monitoring procedures, procedures undertaken for replenishing the Designated Account and use of the Project's asset shall be provided as an annex to the project Implementation Manual (incorporating the financial management policies and procedures). Additional mitigation measures will include advocating good governance, close monitoring, and spot checks by the internal audit units of the implementing entities, as well as enhanced social responsibility by the GoSL and implementing entities.
17. **Inefficient service delivery due to poor governance practices and weak PFM environment is an inherent issue.** Possibility of circumventing the internal control system such as colluding practices, bribes, abuse of administrative positions, mis-procurement among other considerations are critical risks that may arise. Other internal control incidences that may expose the project to fraud and corruption include but not limited to (a) late submission of supporting documents; (b) poor filing and records; (c) lack of work plans and or budget discipline; (d) unauthorized commitment to suppliers, and (e) bypassing budget and expenses vetting procedures. The project shall mitigate these potential fraud and corruption related risks through (i) strengthened project monitoring; ii) specific aspects on corruption auditing will be included in the TORs for the external audit; (iii) targeted FM Procedures and internal control mechanisms across the project activities shall be detailed in the PIM; (iv) strong FM staffing arrangements; (v) periodic FM supervisions; vi) IFRs reviews and monitoring.
18. **External Audit.** The Audit Service Sierra Leone (ASSL) is by law responsible for the audit of all government finances and Projects. However, in view of the prevailing capacity constraints, it is likely that the ASSL could outsource such service to a private firm of auditors with qualifications and experience acceptable to the IDA. The PCU will be responsible for preparing the project financial statements on which the auditor will issue a single opinion covering Project accounts, the usage of statement of expenditures, and the management of designated accounts. In addition, a management letter outlining any internal control weaknesses will also be issued by the external auditor together with the audit report.
19. **The annual financial statements should be prepared in accordance with International Public-Sector Accounting Standards** (which inter alia include the application of the cash basis of recognition of transactions) and will be audited in accordance with International Standard on Auditing and submitted to the Bank within 6 months after the end of each fiscal year.



20. **The project financial statements will be audited annually in accordance with International Standard on Auditing (ISA) by independent auditors acceptable to IDA based on TORs acceptable to IDA as above annotated.** The auditors should be appointed prior to the first audits period to allow the auditors able to submit the audit report within the due date. The audited financial statements will be submitted to IDA within six months after the end of each fiscal year. The cost of the audit will be financed from the project proceeds.
21. **Implementation Support Plan.** As the overall FM risk rating of the project is substantial (after consideration of mitigation measures), implementation support of project financial management will be performed at least twice a year. The implementation support of the Project will closely monitor the FM aspects and will include but not limited to operation of designated accounts, evaluation the quality of budgets, project financial monitoring and management reviews of financial reports, quality of IFRs, relevancy of the PIM (incorporating the financial management policies and procedures), internal controls, work and document flow and quality of financial records, and follow up of audit and mission findings. The review will also conduct random reviews of the statements of expenditures, compliance with covenants. Based on implementation support result, the risk will be re-assessed, and the frequency of supervision recalibrated.
22. **Financial Management Action Plan.** Table 3 below shows the financial management action plan for the Project.

No.	Action	Due date	Responsible
1.	Preparation of the Project Implementation Manual incorporating the financial management policies and procedures.	Effectiveness	MLHCP
2.	Recruitment of FM Specialist (a professionally qualified accountant) to help set up a complete set of accounting books for the new project.	Effectiveness	MLHCP
3.	The PCU will recruit an internal auditor to ensure operations of the project are reviewed on a regular basis.	Effectiveness	MLHCP
4.	Identify and procure appropriate software for use in project accounting.	Effectiveness	MLHCP
5.	Agree on formats and content of IFRs.	Effectiveness	MLHCP
6.	Open segregated designated account.	Effectiveness	MLHCP
7.	Provision of specific training in FM & disbursement for project FM staff.	Three months after effectiveness	World Bank

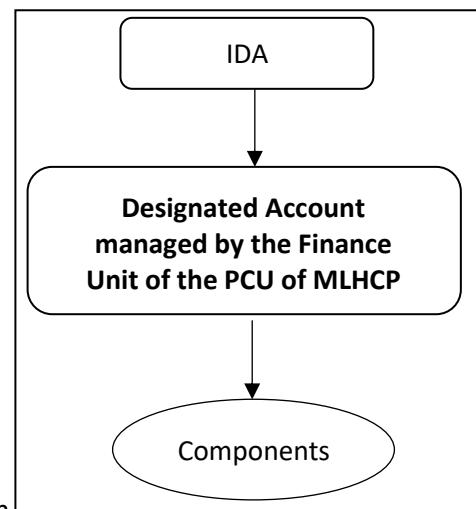
Table 3: Financial Management Action Plan



23. **Conclusion.** The conclusion of the assessment is that with the implementation of agreed-upon actions, the financial management arrangements meet the minimum requirements. The overall FM residual risk of the Project is 'substantial'.

*(iii) disbursement*

24. **Disbursement Arrangements:** In terms of disbursements, the proceeds of the grant will be disbursed in accordance with the World Bank's disbursements guidelines that will be outlined in the Disbursement Letter and in accordance with the World Bank Disbursement Guidelines for projects. Electronic disbursement will be used under this project. To ensure that funds are readily available for project implementation, a Designated Account will be opened in U.S Dollar with a bank acceptable to IDA. Authorized signatories, names and corresponding specimens of signatures should be submitted to the WB prior to the receipt of the first Withdrawal Application. All Withdrawal Applications will include appropriate supporting documentation.
25. **The Project provides for the use of 'advances, reimbursements, direct payment, and special commitments' as applicable disbursement methods, and these will be specified in the disbursement letter.** A forecast of the first 6 months expenditures will form the basis for the initial withdrawal of funds from the Credit, and subsequent withdrawals will be based on the net cash requirements. Supporting documentation will be retained by the implementing agencies for review by the IDA missions and external auditors.



26. **Flow of Funds.** The flow of funds will be as follows and as outlined in  
27. Figure 2: The PCU will maintain a segregated designated account into which the Bank will provide advances that will be used to finance Project activities.

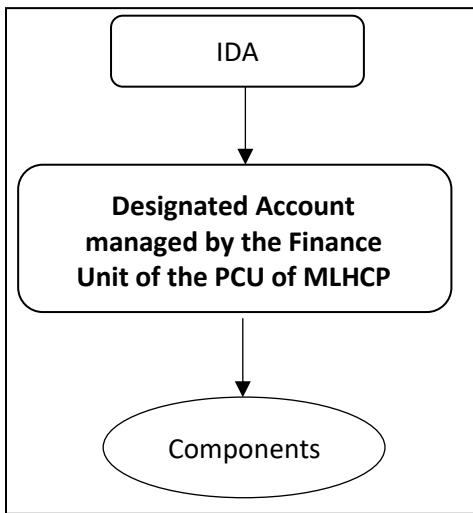


Figure 2: Flow of funds

(iv) procurement

7. **Procedures.** Procurement under the proposed project will be carried out in accordance with the World Bank 'Procurement Regulations for Investment Project Financing Borrowers' (dated July 2016 and revised in November 2017, August 2018 and November 2020), the 'Guidelines on Preventing and Combating Fraud and Corruption in Projects Financed by IBRD Loans and IDA Credits and Grants' (dated July 1, 2016) and beneficiary disclosure requirements, as well as other provisions stipulated in the Project Legal Agreements. Furthermore, the Sierra Leone 'National Public Procurement Act of 2016' will apply for tenders approaching national market taking into considerations the requirements of Clauses 5.3, 5.4, 5.5 and 5.6 of the Procurement Regulations for IPF Borrowers.
8. **Implementation arrangements.** Procurement under this project shall be carried out by the PCU that will be established in the Ministry of Lands, Housing and Country Planning. The unit shall include a procurement specialist with required qualification and experience acceptable to the Bank to perform procurement operations and shall report to the project coordinator. A procurement assistant with required qualification and experience acceptable to the Bank will be hired as well.
9. **Preparation of Project Procurement Strategy for Development.** As part of the preparation of the Project, the Borrower has prepared a draft PPSD which describes how procurement activities will support Project operations for the achievement of PDOs and deliver Value for Money. The PPSD will be completed during appraisal, prior to negotiations. The procurement strategy is linked to the project implementation strategy ensuring proper sequencing of the activities. The PPSD considers institutional arrangements for procurement; roles and responsibilities; thresholds, procurement methods, prior review, and the requirements for carrying out procurement. It also includes a detailed assessment and description of implementing agency's capacity for carrying out procurement and managing contract implementation, within an acceptable governance structure and accountability framework. Other issues include the behaviors, trends, and capabilities of the market (i.e., Market Analysis) to respond to the



procurement plan.

10. **Procurement Planning.** A Procurement Plan is included in the PPSD and outlines the procurement procedures to be used to plan and monitor implementation of investment activities. The Procurement Plan for the Project details the activities to be carried out during the first 18 months reflecting the actual project implementation needs and will be completed before negotiations.
11. **Standard Procurement Documents (SPD):** The project shall use the latest SPD versions of December 2019 for Consulting Services, February 2020 for Non-Consulting Services, August 2020 for Goods and January 2021 for Works or any other version as revised.
12. **Use of Country Systems.** For procurements involving National Procurement Procedures below the defined thresholds, national procurement systems may be used as defined by the PPSD taking into considerations the requirements of Clauses 5.3, 5.4, 5.5 and 5.6 of the Procurement Regulations for IPF Borrowers. The project activities will also require strong technical capability to prepare proper technical specifications to avert lack of, or inadequate, market response, this capability, or a plan to enhance it will be described in the procurement strategy. Open competitive approach to the market will be the World Bank preferred approach as it provides all eligible bidders/proposers with timely and equal opportunity to provide the required goods or services.
13. **Procurement Management Risk Assessment.** Given that the country's post conflict and fragility context with capacity constraints the procurement management risk assessment found that (a) The PCU is yet to be established and the capacity of procurement staff in the Ministry of Lands, Housing and Country Planning is low (b) There is lack of knowledge in the use of the World Bank's Procurement Regulations and use of STEP; (c) need for establishment of the record keeping system; (d) Inefficiencies and delays in procurement process; (e) Insufficient competition in procurement and (f) Weak complaint redress system.
14. **Procurement Risk.** The procurement management risk for this Project is rated *High*. To address the risks and weaknesses identified, mitigation measures have been discussed and agreed with the Ministry of Lands, Housing and Country Planning as shown in

Risk Factor	Mitigation Measure
PCU	<ul style="list-style-type: none"><li>• Establishment of PCU staffed with a qualified and experienced procurement staff.</li></ul>
Capacity building of procurement staff	<ul style="list-style-type: none"><li>• Attend training in World Bank procurement procedures.</li><li>• Conduct training on World Bank procurement procedures.</li><li>• Hand Holding.</li><li>• Regular supervision, support, and monitoring.</li></ul>
Record management	<ul style="list-style-type: none"><li>• Establish good record management system.</li></ul>
Limited knowledge in the World Bank's Procurement Regulations and use of STEP	<ul style="list-style-type: none"><li>• Conduct regular procurement clinics.</li><li>• Hand-holding the team on use of STEP</li></ul>



Risk Factor	Mitigation Measure
Inefficiencies and delays in procurement process	<ul style="list-style-type: none"> <li>• Regular monitoring through procurement plan in STEP.</li> <li>• Conduct regular meeting to identify delays, their causes and provide solutions.</li> </ul> <p>Technical and procurement teams to work together across different beneficiary agencies.</p>
Insufficient competition in procurement	<ul style="list-style-type: none"> <li>• Aggregation of smaller contract packages wherever feasible</li> <li>• Sensitization of private sector to bid for public tenders.</li> </ul>
Weak complaint redress system	<ul style="list-style-type: none"> <li>• Disclosure of complaint redress procedure.</li> <li>• Bi-annual report of all complaints received, and action taken.</li> </ul>
Fraud and corruption risks [including collusion and outside interference] in contracting process	<ul style="list-style-type: none"> <li>• Disclosure of procurement plan, invitation for bids, and bidding documents.</li> <li>• Monitor Bidders and bids using a company risk profile database and check references of experience certificates, checks authenticity of bank guarantees and insurance policies, etc.</li> <li>• Strengthen bid evaluation committees and define tasks related to resolving complaints during selection phase and standstill period, and beyond.</li> <li>• Disclosure of contract awards and stress on Beneficial Ownership disclosure.</li> <li>• Creating awareness on effects of fraud and corruption to local to central and local government PIUs and to bidder community.</li> <li>• Regular reviews such as PPR, internal Audit, external audit and follow up on audit findings and recommendations.</li> </ul>

15. Table 4 below and the recommendation of the PSD that will be submitted by the government and approved by the Bank. The residual risk rating is *Substantial*.
16. **Procurement Post Reviews (PPRs) and Independent Post Reviews (IPRs) by the World Bank.** Based on the assessed agency implementation risk for procurement, which is high Risk, the World Bank will carry out PPRs or IPRs for all contracts based on the approved procurement plan not having been subject of prior review by the Bank using a sample of 20 percent. Based on continuing assessment of risk and the success of risk mitigation measures implemented, the sample size will be reduced as risk mitigation measures are successfully implemented. Note that based on risk rating the sample sizes for the PPRs or IPRs are as follows: 5 percent for Low-Risk rating, 10 percent for Moderate Risk rating, 15 percent for Substantial Risk rating and 20 percent for High-Risk rating.

Risk Factor	Mitigation Measure
PCU	<ul style="list-style-type: none"> <li>• Establishment of PCU staffed with a qualified and experienced procurement staff.</li> </ul>
Capacity building of procurement staff	<ul style="list-style-type: none"> <li>• Attend training in World Bank procurement procedures.</li> <li>• Conduct training on World Bank procurement procedures.</li> <li>• Hand Holding.</li> <li>• Regular supervision, support, and monitoring.</li> </ul>
Record management	<ul style="list-style-type: none"> <li>• Establish good record management system.</li> </ul>
Limited knowledge in the World Bank's Procurement Regulations and use of STEP	<ul style="list-style-type: none"> <li>• Conduct regular procurement clinics.</li> <li>• Hand-holding the team on use of STEP</li> </ul>



Risk Factor	Mitigation Measure
Inefficiencies and delays in procurement process	<ul style="list-style-type: none"> <li>• Regular monitoring through procurement plan in STEP.</li> <li>• Conduct regular meeting to identify delays, their causes and provide solutions.</li> </ul> <p>Technical and procurement teams to work together across different beneficiary agencies.</p>
Insufficient competition in procurement	<ul style="list-style-type: none"> <li>• Aggregation of smaller contract packages wherever feasible</li> <li>• Sensitization of private sector to bid for public tenders.</li> </ul>
Weak complaint redress system	<ul style="list-style-type: none"> <li>• Disclosure of complaint redress procedure.</li> <li>• Bi-annual report of all complaints received, and action taken.</li> </ul>
Fraud and corruption risks [including collusion and outside interference] in contracting process	<ul style="list-style-type: none"> <li>• Disclosure of procurement plan, invitation for bids, and bidding documents.</li> <li>• Monitor Bidders and bids using a company risk profile database and check references of experience certificates, checks authenticity of bank guarantees and insurance policies, etc.</li> <li>• Strengthen bid evaluation committees and define tasks related to resolving complaints during selection phase and standstill period, and beyond.</li> <li>• Disclosure of contract awards and stress on Beneficial Ownership disclosure.</li> <li>• Creating awareness on effects of fraud and corruption to local to central and local government PIUs and to bidder community.</li> <li>• Regular reviews such as PPR, internal Audit, external audit and follow up on audit findings and recommendations.</li> </ul>

Table 4: Project Procurement Risk Factors and Mitigation Measures

17.

No.	Action	Due date	Responsible
1	Completion and clearing of PPSD.	Negotiations	MLHCP
2	Hiring of procurement Staff.	Before project effectiveness	MLHCP
2	Strengthen capacity on the use of STEP tools, which is being used to manage all procurement transactions and related documentation.	Immediately	World Bank
3	Finalize the PIM to include procurement procedures and implementation arrangements for the project along with the standard and sample documents to be used.	Effectiveness	MLHCP
4	Develop procurement records and contract management systems to ensure efficient and effective contract management.	Three months after effectiveness and continuous monitoring	MLHCP

18. Table 55 includes agreed actions for preparation, negotiations, and effectiveness of the Project.

No.	Action	Due date	Responsible
1	Completion and clearing of PPSD.	Negotiations	MLHCP
2	Hiring of procurement Staff.	Before project effectiveness	MLHCP
2	Strengthen capacity on the use of STEP tools, which is being used	Immediately	World Bank



No.	Action	Due date	Responsible
	to manage all procurement transactions and related documentation.		
3	Finalize the PIM to include procurement procedures and implementation arrangements for the project along with the standard and sample documents to be used.	Effectiveness	MLHCP
4	Develop procurement records and contract management systems to ensure efficient and effective contract management.	Three months after effectiveness and continuous monitoring	MLHCP

Table 5: Procurement Action Plan

*(v) strategy and approach for implementation support*

19. **An implementation strategy has been defined to support project implementation.** The strategy is based on the project's risk profile and the technical specifics of the project, considering the national context within which the Project is being implemented. The World Bank team will focus on priority activities to overcome key risks, such as institutional capacity for implementation, compliance with environmental and social standards, fiduciary aspects, and political and governance issues, including the coordination between a broad range of stakeholders. The implementation support plan also reflects the planned implementation schedule and lessons learned from similar Projects. It will focus on strengthening the capacity of the PCU and implementing agencies throughout project execution through a regular dialogue with all project stakeholders.
20. **Implementation support will consist of formal implementation support missions, technical missions as needed, and regular technical meetings.** This support will include regular reporting and monitoring of FM, procurement, and environmental and social standards compliance. Formal missions will be carried out at least twice a year, with ongoing and continued on-demand implementation support provided. The required support is expected to be high in the first three years of implementation. Missions and meetings will be carried out virtually and in-person, depending on the COVID-19 circumstances, which are closely monitored by the World Bank. Trainings will be provided as needed and will include in the first year of implementation introductory meetings to the World Bank's fiduciary policies as well as the E&S related frameworks and processes.
21. **Several specialized technical experts are part of the World Bank's team and will work with the client to provide hands on assistance and build capacity as the project is implemented.** It is anticipated that this support will contribute to overcoming some of the risks related to capacity constraints on the client side. In addition to technical expertise, the World Bank's task team will include procurement and financial management experts as well as environmental and social specialists who will work closely with the client. The team includes staff and consultants at the World Bank's headquarters, within the region as well as within Sierra Leone. Technical experts include land administration specialists, a surveyor, a geodetic network specialist, a land information system specialist, a gender specialist, a land law specialist, and will be adjusted as needed, depending on the project's needs.

*(vi) implementation support plan and resource requirements*

22.

Focus

Skills needed

Resources estimate



<b>Year 1</b> <ul style="list-style-type: none"> <li>• Establishment of PCU</li> <li>• Implementation of background studies</li> <li>• Launch of activities planned for year 1, including pilot works</li> <li>• preparation of site-specific E&amp;S documents</li> <li>• Fiduciary and E&amp;S trainings</li> </ul>	<p><b>Full Task Team:</b></p> <ul style="list-style-type: none"> <li>• Task Team Leader (TTL) (8 SWs)</li> <li>• Lead Land Administration Specialist (1 SW)</li> <li>• Land Lawyer (3 SW)</li> <li>• LIS Specialist (4 SW)</li> <li>• Surveying &amp; Registration Specialist (6 SW)</li> <li>• Gender Specialist (2 SW)</li> <li>• Geodetic Specialist (4 SW)</li> <li>• Procurement Specialist (4 SW)</li> <li>• FM Specialist (4 SW)</li> <li>• Social Specialist (5 SW)</li> <li>• Environmental Specialist (4 SW)</li> <li>• Civil Engineer (4 SW)</li> <li>• Economist (3 SW)</li> <li>• Team Assistant (4 SW)</li> </ul>	<b>56 staff weeks</b> <b>3 implementation support missions</b> <b>1 technical mission</b>
<b>Year 2-5</b> <ul style="list-style-type: none"> <li>• Initiating activities for year 3-4 works</li> <li>• Continued support to procurement and implementation of works, non-consultancy services and capacity building</li> <li>• Mid-Term Review</li> <li>• ICR</li> </ul>	<ul style="list-style-type: none"> <li>• TTL (32 SWs)</li> <li>• Lead Land Administration Specialist (4 SW)</li> <li>• Land Lawyer (13 SW)</li> <li>• LIS Specialist (22 SW)</li> <li>• Surveying &amp; Registration Specialist (24 SW)</li> <li>• Gender Specialist (12 SW)</li> <li>• Geodetic Specialist (18 SW)</li> <li>• Procurement Specialist (16 SW)</li> <li>• FM Specialist (16 SW)</li> <li>• Social Specialist (20 SW)</li> <li>• Environmental Specialist (16 SW)</li> <li>• Civil Engineer (10)</li> <li>• Economist (3 SW)</li> <li>• Team Assistant (16 SW)</li> <li>• M&amp;E Specialist (4 SW)</li> </ul>	<b>226 staff weeks</b> <b>8 implementation support missions</b> <b>4 technical missions</b> <b>1 MTR mission</b> <b>1 ICR mission</b>

23. Table 6 summarizes the Project's implementation support plan.

<b>Time</b>	<b>Focus</b>	<b>Skills needed</b>	<b>Resources estimate</b>
<b>Year 1</b> <ul style="list-style-type: none"> <li>• Establishment of PCU</li> <li>• Implementation of background studies</li> <li>• Launch of activities planned for year 1, including pilot works</li> <li>• preparation of site-specific E&amp;S documents</li> </ul>	<p><b>Full Task Team:</b></p> <ul style="list-style-type: none"> <li>• Task Team Leader (TTL) (8 SWs)</li> <li>• Lead Land Administration Specialist (1 SW)</li> <li>• Land Lawyer (3 SW)</li> <li>• LIS Specialist (4 SW)</li> <li>• Surveying &amp; Registration Specialist (6 SW)</li> <li>• Gender Specialist (2 SW)</li> </ul>	<b>56 staff weeks</b> <b>3 implementation support missions</b> <b>1 technical mission</b>	



	<ul style="list-style-type: none"> <li>• Fiduciary and E&amp;S trainings</li> </ul>	<ul style="list-style-type: none"> <li>• Geodetic Specialist (4 SW)</li> <li>• Procurement Specialist (4 SW)</li> <li>• FM Specialist (4 SW)</li> <li>• Social Specialist (5 SW)</li> <li>• Environmental Specialist (4 SW)</li> <li>• Civil Engineer (4 SW)</li> <li>• Economist (3 SW)</li> <li>• Team Assistant (4 SW)</li> </ul>	
Year 2-5	<ul style="list-style-type: none"> <li>• Initiating activities for year 3-4 works</li> <li>• Continued support to procurement and implementation of works, non-consultancy services and capacity building</li> <li>• Mid-Term Review</li> <li>• ICR</li> </ul>	<ul style="list-style-type: none"> <li>• TTL (32 SWs)</li> <li>• Lead Land Administration Specialist (4 SW)</li> <li>• Land Lawyer (13 SW)</li> <li>• LIS Specialist (22 SW)</li> <li>• Surveying &amp; Registration Specialist (24 SW)</li> <li>• Gender Specialist (12 SW)</li> <li>• Geodetic Specialist (18 SW)</li> <li>• Procurement Specialist (16 SW)</li> <li>• FM Specialist (16 SW)</li> <li>• Social Specialist (20 SW)</li> <li>• Environmental Specialist (16 SW)</li> <li>• Civil Engineer (10)</li> <li>• Economist (3 SW)</li> <li>• Team Assistant (16 SW)</li> <li>• M&amp;E Specialist (4 SW)</li> </ul>	226 staff weeks 8 implementation support missions 4 technical missions 1 MTR mission 1 ICR mission

Table 6: Implementation support plan

24. The required skill mix is shown in

Skill	Staff weeks/year
Task Team Leader	8
Lead Land Specialist	1
Land Lawyer	3.2
LIS Specialist	5.2
Surveying & Registration Specialist	6
Gender Specialist	2.8
Geodetic Specialist	4.4
Procurement Specialist	4
FM Specialist	4
Social Specialist	5
Environment Specialist	4
Civil Engineer	2.8
Economist	1.2
Team Assistant	4
M&E Specialist	0.8

25. Table 7.

Skill	Staff weeks/year



Task Team Leader	8
Lead Land Specialist	1
Land Lawyer	3.2
LIS Specialist	5.2
Surveying & Registration Specialist	6
Gender Specialist	2.8
Geodetic Specialist	4.4
Procurement Specialist	4
FM Specialist	4
Social Specialist	5
Environment Specialist	4
Civil Engineer	2.8
Economist	1.2
Team Assistant	4
M&E Specialist	0.8

*Table 7: Skills mix required*

**ANNEX 2: Climate Change Considerations**

1. **Climate vulnerability context.** In Sierra Leone, climate change threatens food security and the livelihoods of most of the population. Changes in precipitation and temperature, increase in risks of droughts, floods, and increase in sea level effect the country's agriculture, water, energy, infrastructure, and coastal areas. The local climate is tropical, with coastal areas having hot and humid weather and inland areas having a more temperate climate. The average annual temperature is 26.7°C and the annual average rainfall is 2,746 mm (1961 – 1990). Sierra Leone's mean annual temperature has increased by 0.8°C since 1960 and the Harmattan (dry dusty cool air) has recorded to be warmer than usual in recent times. The precipitation regime has become more erratic in the last 50 years and recently, delays in the start of rain season have been witnessed. The pre-monsoon period (April – June) is now associated with stronger winds and more frequent rain/storms. Calmer and dryer weather now appears to be associated with the September/November period which was usually characterized by frequent thunder and lightning and short but heavy rainfall.<sup>80</sup>
2. **Project specific climate risks.** Climate risks that are relevant for the project are associated with the second most intensive rainfalls in Africa,<sup>81</sup> extreme temperature and sea level rise, generating pluvial and fluvial flooding and coastal flooding and erosion<sup>82</sup>, which threatens low-lying areas in Sierra Leone. Increased population displacement and loss of property are among the expected impacts.<sup>83</sup> These risks could affect buildings and plots supported under the Project and could affect land to be registered with Project financing. Intense rainfalls, increased temperatures and the other climate risks identified above could lead to population migration, affecting land tenure and associated boundaries with the potential for disputes. Further, climate induced disasters, such as mudslides caused by heavy rainfalls and settlements in high-risk zones due to insufficient land use planning and knowledge of land parcel ownership, affects the livelihoods of citizens.
3. **The role of land tenure in climate change is two-fold. It acts as both a cause and a solution.** Adequate land management can promote efficient climate resilient land use planning, forest conservation, avoid environmental degradation and the settlement in high-risk areas, overall contributing to climate solutions. Changes in land management affect local energy and water cycles, and therefore the local climate: Limited tenure security disincentivizes long-term investments by farmers in climate-smart agriculture as well as reforestation. The lack of registered land and up to date maps affects climate-resilient planning and hinders disaster response activities as evidenced by the Freetown mudslide of 2017. Inadequate property spatial and ownership information undermined urban planning and the associated disaster risk management.<sup>84</sup> The lack of up-to-date land records and the lack of land-based solutions in different sectors hinders efficient interventions to mitigate and adapt to climate change.
4. **Project activities will contribute to the World Bank's Climate Change Action Plan (2021-2025)<sup>85</sup>.** Land is among

<sup>80</sup> World Bank Climate Change Knowledge Portal. <https://climateknowledgeportal.worldbank.org/country/sierra-leone>

<sup>81</sup> After Sao Tome and Principe; See <https://data.worldbank.org/>

<sup>82</sup> Based on results from the World Bank Group's Climate and Disaster Risk Screening Project Level Tool (Climate and Disaster Risk Screening Report for Sierra Leone Land Administration Project).

<sup>83</sup> <https://climateknowledgeportal.worldbank.org/country/sierra-leone>

<sup>84</sup> World Bank (2019): Support to the Sierra Leone Land Agenda. Policy Note.

<sup>85</sup> World Bank (2021): World Bank Group Climate Change Action Plan 2021–2025: Supporting Green, Resilient, and Inclusive Development. <https://openknowledge.worldbank.org/handle/10986/35799>



the five key systems that the Action Plan foresees to support: energy; agriculture, food, water, and land; cities; transport; and manufacturing. The Action Plan states that the World Bank will develop skills in these key sectors by supporting education, training, and retraining. The institution and capacity building activities under the Project will support this goal for the land sector. Project activities will also contribute to the Action Plan goals of supporting climate-smart agriculture and managing flood risks. Improving urban land use planning and regulations is highlighted in the Action Plan as particularly important. Project activities will contribute to improved land use planning by developing a land information system and establishing relevant land ownership and boundary data.

5. **Project activities will contribute to the Government's National Climate Change Policy,<sup>86</sup> Climate Change Strategy and Action Plan<sup>87</sup> and the intended NDC.<sup>88</sup>** The project intends to finance climate change adaptation and mitigation related activities, several of which will support the country's NDC strategies. This includes *improved natural resource management* as the legal and operational support under the Project will provide the basis for recording and registering customary land tenure. Secure tenure provides incentives for long-term investments in climate-smart agriculture and collateral for financing these investments.<sup>89</sup> Further, the registration of customary land would contribute to *improved forest management* as land registration and secure tenure incentivizes smallholders to engage in tree planting as these require stable long-term commitment.<sup>90</sup> Furthermore, clear and recognized tenure rights are often the primary basis and land ownership data is required for performance-based payments in carbon financing instruments.<sup>91</sup> In the urban space, the Project would contribute to *resilient cities and integrated land use planning* as an adequate digital land information system would enable a more efficient detection of illegal land conversions in high-risk areas. Finally, the project will enable *improved disaster response mechanisms* as registering, and digitizing land protects property rights and their owners during disasters since land data enhances early warning systems, systematic evaluation of disaster damage and development of climate disaster compensation and insurance schemes.<sup>92</sup>
6. **Climate considerations for subcomponent 1.1 (institutional development).** This subcomponent will, inter alia, finance the construction and/or renovation of new land office buildings. Building design will be climate resilient. Designs will take flood risks into consideration and will be energy efficient by using solar power to address the required electricity needs for the digitalization and geodetic network activities under component 2. Building design will also integrate energy efficient lighting and equipment, roof top greenery, measures/design principles that reduce the need for air-conditioning, elevated construction to protect against flood risk, and resilient building materials. The subcomponent will finance an institutional strategy, which will include sections or separate strategic documents on how to address linkages between land and climate change, e.g., strategies on how to prevent citizens from settling in high-risk zones and how to deal with land tenure in situations where citizens are already residing in high-risk zones (if identified during land registration related activities). In line with the NDC, financing will be provided to mainstream climate change adaptation issues in other land related procedures, guidelines, and manuals, e.g., with regard to systematic land registration manuals and procedures that would

<sup>86</sup> Government of Sierra Leone (n.d.): National Climate Change Policy.

<sup>87</sup> Government of Sierra Leone (n.d.): National Climate Change Strategy and Action Plan.

<sup>88</sup> Government of Sierra Leone (n.d.): Sierra Leone's Intended Nationally Determined Contribution (INDC); Government of Sierra Leone (2021): Updated Nationally Determined Contribution (INDC).

<sup>89</sup> UNFAO (2014). Climate-smart agriculture & resource tenure in Sub-Saharan Africa: A Conceptual Framework.

<sup>90</sup> Rahman, S., Sunderland, T., Roshetko, J. & Healey, J. (2017). Facilitating smallholder tree farming in fragmented tropical landscapes.

<sup>91</sup> Forest Carbon Partnership Facility (2016). Carbon Fund – Methodological Framework. 41 p.; Larson, A.M., et al. (2013). Land Tenure and REDD+: the good, the bad and the ugly.

<sup>92</sup> World Bank (2020): Solid Ground: Increasing Community Resilience Through Improved Land Administration and Geospatial Information Systems.



require a screening of climate risks in registration areas to avoid formalizing land tenure in high-risk zones; the need for including climate risk related communication in awareness programs in the context of land registration activities, etc.

7. **Climate considerations for subcomponent 1.2 (legal reform).** The technical assistance to be financed by the project with regard to legal reform activities will ensure that climate-change considerations are part of the assessments and drafting processes of laws and regulations. For example, the survey law would provide guidance for the surveying of cadastral boundaries as well as surveying of ecologically sensitive areas, forests, protected areas, etc. to provide a basis for climate change related activities by the government.
8. **Climate considerations for subcomponent 1.3 (sensitization).** The Project will finance a public awareness campaign, which will focus on general public awareness raising to inform people about the changes in institutions and practice of registration. The campaign will put a strong focus on land-related climate change issues related to land tenure and ownership within urban and rural areas at high risk of climate induced disasters.<sup>93</sup> The campaign would also showcase how more secure tenure and new local land committees in rural areas would support reforestation and climate smart agriculture activities. As outlined in the draft CLRB and NLCB, the campaign would also emphasize communities' responsibility to promote protection and conservation of ecologically sensitive areas.
28. **Climate considerations for subcomponent 2.1 (establishment of a land information system).** The current, paper-based system of registering rights and allocating state land to private entities does not allow for adequate risk monitoring and enforcement of land use plans and identification of landowners or land users in high-risk zones that are prone to climate induced disasters. The digitization of land records will lead to improved geospatial analytics, enabling government to clearly identify landowners and their boundaries within high-risk zones. Once digital data on land ownership and location is available, the monitoring of illegal land conversions in high-risk areas will be more efficient as permitting and planning activities can be based on up-to-date land boundaries and ownership information. Having digital information on customary land rights around urban centers will help government to better manage urban sprawl and the associated deforestation and conversion of sensitive ecosystems to urban land. Specifically, the project will make the LIS accessible to other institutions if they desire, including NDMA to improve the geospatial data foundation of Sierra Leone's early warning system. The project will make land parcel boundary data, land ownership data and risk maps available to NDMA. This will allow NDMA to identify landowners and their boundaries in high-risk zones, which in turn would assist NDMA to plan future disaster response mechanisms and identify any potential mitigation measures for citizens affected by climate risks. Access to the LIS will also be provided to MAF to provide the geospatial foundation and land ownership information for potential reforestation activities. Once the land parcel boundary data and land ownership information are available to MAF, it will enable MAF to identify landowners that could assist with reforestation activities on their land or be part of carbon financing schemes. The FCC will also be provided with access to the land data to enable improved climate resilient land use planning in coordination with MLHCP's planning department. Once FCC has access to the land boundary and ownership data, FCC will be able to layer the data with existing information of high-risk zones in Freetown to inform solutions for people living in areas prone to climate risks. Similar to the NDMA, it will enable FCC to react to any potential future climate induced disasters more efficiently since affected citizens could be identified immediately (e.g., for disaster response activities) and it would inform future risk assessments for the city.

<sup>93</sup> E.g., such as those outlined in the CLRB and NLCB regarding communities' responsibility to promote protection and conservation of ecologically sensitive areas.



9. **Climate considerations for subcomponent 2.2 (base mapping and land cadastre).** The establishment of base maps and a land cadastre supports adaptation action as the entailed information protects property rights and their owners during disasters, enables targeted relief and faster reconstruction. The base maps and land cadastre provides the foundation for a transparent land information system, which eventually will hold information on landowners, land uses, land values, land locations, etc. Accessible and well managed cadastre/registry data are key datasets for the development of climate disaster early warning systems, systematic evaluation of disaster damage and development of climate disaster compensation and insurance schemes (see subcomponent 2.1). Once the base maps and the cadastre are developed, the new systems and generated information could contribute to improved post-disaster recovery in cases of temporary resettlement or parcel boundary disappearance.<sup>94</sup> Low tenure security and lack of location and ownership information of land usually leaves tenants vulnerable as they are reluctant to leave their land even in severe conditions, as possibility for returning is uncertain.<sup>95</sup> Specifically, the Project will use the base maps not only for cadastral mapping but also for identification and mapping of high-risk zones, i.e. areas that are prone to be affected by climate induced disasters, such as floods, mudslides, etc. Digital terrain models will be procured to create risk maps, which will be shared with other entities such as NDMA and FCC under subcomponent 2.1. The risk maps will be used further under component 3 for the recording of land rights and identification of citizens living within high-risk zones to define solutions and assist with future, more resilient planning processes.
10. **Climate considerations for subcomponent 2.3 (geodetic network).** The geodetic network will consist of a CORS network and ground marks suitably located to improve the accuracy and efficiency of survey works. To provide MLCHP and other users with means to use legacy spatial data and maps, the Project will finance the measurement of a sufficient number of triangulation points for computation of transformation parameters between the historic datums and ITRF. Land survey standards and procedures will be revised to set new accuracy requirements and provide guidelines on how to use the new national CORS and terrestrial networks. Training in using the new geodetic network will include besides MLHCP and private sector surveyors, NDMA and MAF to ensure that their future mapping needs of high-risk zones or forest boundaries or other ecologically sensitive areas will be more accurate. The geodetic network will improve topographic mapping, land surveys, and engineering surveys, all of which are relevant for informing climate change mitigation and adaptation programs by providing the necessary geospatial data for analysis of the status quo, future scenarios, and plans to address identified issues.
11. **Climate considerations for component 3 (recording and registration of land tenure rights).** This component will finance the mapping and recording/registration of customary land to strengthen customary land tenure. Evidence shows that when land tenure is secure that landowners are incentivized to make long-term investments, which would not occur in a low tenure security context. The literature confirms that secure tenure provides incentives for long-term investments in climate-smart agriculture and collateral for financing these investments.<sup>96</sup> Hence, the project activities would provide incentives to farmers for increasing climate-smart agriculture. The same is true for reforestation: Lack or insecure land tenure rights prevents smallholders to engage with tree planting and

<sup>94</sup> Quan, J. & Dyer, N. (2008). Climate Change and Land Tenure: The Implications of Climate Change for Land Tenure and Land Policy. Land Tenure Working Paper 2, UNFAO, Rome; USAID (2011). Climate Change, Property Rights & Resource Governance: Emerging Implications for USG Policies and Programming. 9 p. USAID.

<sup>95</sup> Mitchell, D., McEvoy, D. & Antonio, D. (2018). A Global Review of Land Tenure, Climate Vulnerability and Adaptive Capacity. 18 p. 2018 World Bank Conference on Land and Poverty, World Bank, Washington.

<sup>96</sup> UNFAO (2014). Climate-smart agriculture & resource tenure in Sub-Saharan Africa: A Conceptual Framework. 26 p. UNFAO, Rome; Pattanayak, S.K., Mercer, E., Sills, E., & Yang, J-C. (2003). Taking stock of agroforestry adoption studies. Agroforestry Systems, 57, 173–186; USAID (2015). Land Tenure & Climate-Smart Agriculture. 16 p. USAID.



agroforestry as these require stable long-term commitment.<sup>97</sup> Registering customary tenure as envisaged under this component would enable such long-term commitments, which contribute to mitigation measures. Further, deforestation tends to occur more often when tenure rights are unclear, and land is accessed by clearing forested areas. The component will finance improved processes for accessing land through a formal system that coordinates closely with customary institutions. Also, clear, and recognized tenure rights are often the primary basis for performance-based payments in many carbon financing instruments.<sup>98</sup> The project would also record land tenure and prepare cadastral maps in high-risk zones that are prone to climate induced disasters. In these areas the Project will limit activities to recording of land ownership and land use rights and will not register land rights to not incentivize living in such vulnerable areas. Instead, the project will use the base maps and digital terrain models from component 2's base mapping activities to prepare risk maps for the project areas to identify people living in high-risk zones, e.g., areas with steep slopes prone to mudslides or areas prone to flooding. During the field work activities, the project will inform landowners and land users in these high-risk areas about the climate related risks within their specific location and offer advice on how to mitigate respective climate risks. The risk maps will further inform resilient planning as the data will provide evidence on the number and demographic characteristics of people living in high-risk zones. The data will enable MLHCP, NDMA and other stakeholders with the development of policies to address development challenges related to citizens living in high-risk zones.

<sup>97</sup> Rahman, S., Sunderland, T., Roshetko, J. & Healey, J. (2017). Facilitating smallholder tree farming in fragmented tropical. *Journal of Environmental Management*, 198, 110–121.

<sup>98</sup> Bolin, A., Lawrence, L. & Leggett, M. (2013). Land tenure and fast-tracking REDD+: time to reframe the debate? 9 p. Global Canopy Program; Forest Carbon Partnership Facility (FCPF) (2016). Carbon Fund – Methodological Framework. 41 p.; Larson, A.M., Brockhaus, M., Sunderlin, W.D., Duchelle, A.E., Babon, A., Dokken, T., Pham, T.T., Resosudarmo, I. A. P., Selaya, G., Awono, A., & Huynh T. (2013). Land Tenure and REDD+: the good, the bad and the ugly. *Global Environmental Change*, 23:3, 678–689.