GOVERNMENT OF THE REPUBLIC OF LIBERIA

MINISTRY OF AGRICULTURE

PROJECT IMPLEMENTATION UNIT (RETRAP / SUPAWEP)

SUSTAINABLE URBAN AND PERI-URBAN AGRICULTURE FOR WOMEN EMPOWERMENT PROJECT (SUPAWEP)

Project ID No.: P510360

LABOR MANAGEMENT PROCEDURES (LMP)

Prepared in accordance with World Bank Environmental and Social Standard 2 (ESS2): Labor and Working Conditions

Draft, July 2026

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ACRONYMS

CDA	Cooperatives Development Agency
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
FBO	Farmer-Based Organization
GBV	Gender-Based Violence
GO	Grievance Officer
GRM	Grievance Redress Mechanism
JSDF	Japan Social Development Fund
LMP	Labor Management Procedures
MoA	Ministry of Agriculture
MoLE	Ministry of Labor, Liberia
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
PMU	Project Management Unit
PPE	Personal Protective Equipment
RETRAP	Rural Economic Transformation Project
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SUPAWEP	Sustainable Urban and Peri-Urban Agriculture for Women Empowerment Project
WB	World Bank

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1.0 INTRODUCTION

1.1 Project Background

The Government of Liberia, through the Ministry of Agriculture (MoA), is preparing the Sustainable Urban and Peri-Urban Agriculture for Women Empowerment Project (SUPAWEP), Project ID No. P510360, with grant financing from the Japan Social Development Fund (JSDF) administered by the World Bank. The development objective of the project is to enhance the productivity, resilience and access to market of beneficiary women and youth vegetable farmers in selected urban and peri-urban communities in Liberia. The project will be implemented over a multi-year period through the existing Project Implementation Unit (PIU) that coordinates the Rural Economic Transformation Project (RETRAP, P175263), leveraging its systems, fiduciary capacity and safeguards experience for implementation readiness. The project targets women and youth vegetable farmers across six project counties, including Montserrado, Bong, Margibi, Grand Bassa, Bomi, and Nimba.

The project is organized around three components, drawn from the Concept ESRS, the draft ESMF and the draft Project Paper:

- **Component 1:** Support for the Development of Modern (Smart) Community Vegetable Gardens, financing water infrastructure (boreholes, solar-powered pumping, elevated storage tanks, drip/sprinkler irrigation, greenhouses, fertigation and, where feasible, vertical farming), multipurpose sheds and sanitary facilities, and capacity-building of women and youth vegetable farmers in climate-smart and integrated pest management practices.
- **Component 2:** Support for Vegetable Farmer Clustering, Institutional Strengthening and Market Linkages, including productive partnerships with agribusiness and lead farmers, GLOBALGAP and food safety training, and co-financed postharvest infrastructure such as pack houses and cold storage.
- **Component 3:** Project Management, Monitoring and Evaluation, and Knowledge Dissemination.

Closing Date: 29 June 2029 (implementation period: 4 years, 2026–2029).

Total project cost confirmed at US$5.59 million, financed by a US$4.73 million JSDF grant and US$860,420 in beneficiary/government contributions.

1.2 Purpose of the Labor Management Procedures

These Labor Management Procedures (LMP) set out the manner in which project workers under SUPAWEP will be managed, in accordance with the requirements of World Bank Environmental and Social Standard 2 (ESS2): Labor and Working Conditions, and applicable Liberian labor law, principally the Decent Work Act of 2015 and the Children's Act of 2011. The LMP identifies the main labor requirements and risks associated with the project, and sets out how the project will address those requirements and risks. After reviewing the document, the Bank will disclose it on the MoA webpage and the World Bank's ESMS page, and adopt it within one month. The LMP is a living document that will be reviewed and updated during project implementation as further information on project activities and associated workforce composition becomes available, including

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once civil works contractors are engaged, and community garden operating arrangements are finalized.
The specific objectives of the LMP are to:

- Identify the main categories of project workers and the tasks they are likely to perform;
- Assess the key potential labor risks associated with the project and its activities, including risks specific to women and youth workers;
- Identify the applicable national labor and employment law provisions relevant to the project;
- Set out the responsible staff and institutional arrangements for labor management;
- Set out procedures relating to terms and conditions of work, non-discrimination and equal opportunity, workers' organizations, protection of the workforce (including prohibition of child and forced labor), occupational health and safety, and grievance redress for project workers; and
- Set out requirements for managing labor engaged by contractors, subcontractors and primary suppliers, and for community and in-kind labor contributions under the community garden scheme.

2.0 OVERVIEW OF LABOR USE IN THE PROJECT

ESS2 distinguishes between four categories of project workers. All four are expected to be engaged under SUPAWEP, in varying degrees, throughout the project duration.

2.1 Direct Workers

Direct workers include PIU staff embedded in RETRAP, expanded for SUPAWEP with specialized roles (Coordinator, FM Specialist, Procurement Specialist, M&E Officer, Social/Gender Specialist, Environmental Specialist, Agribusiness Specialist, Infrastructure Specialist, Advisory Services Specialist, MIS Specialist, and county focal persons).

2.2 Contracted Workers

Contracted workers are engaged through third parties (contractors, subcontractors, brokers or agents) to perform work related to the core functions of the project. Under SUPAWEP this category is expected to include: workers engaged by civil works contractors for the construction and rehabilitation of community garden infrastructure (boreholes, solar pumping systems, water storage tanks, drip/sprinkler irrigation networks, greenhouses, perimeter fencing, multipurpose sheds and sanitary facilities under Component 1); workers engaged by contractors for pack house, cold storage and postharvest aggregation infrastructure under Component 2; and consultants and service providers engaged to deliver training, extension, market linkage and advisory services across all three components.

2.3 Primary Supply Workers

Primary supply workers are workers of the project's primary suppliers, engaged on an ongoing basis in supplying goods or materials essential to the core functions of the project, where labor risk is high.

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For SUPAWEP, this category may include workers engaged in the supply of irrigation equipment, solar pumping systems, greenhouse materials, construction inputs, seeds, seedlings and agro-inputs where sourced through arrangements that involve significant, ongoing labor use. The project will apply a proportionate approach to primary supply worker risk consistent with ESS2 paragraph 32, focused on suppliers whose contribution is significant to the project and carries meaningful labor risk (for example, quarry or aggregate suppliers engaged for civil works, or fabricators of steel irrigation and greenhouse structures).

2.4 Community Workers and In-Kind Labor Contributions

Community workers are women and youth farmers who are beneficiaries and contribute in-kind labor to community gardens. Safeguards apply: minimum age 18+, voluntary participation, provision of PPE, and access to the project GRM.

2.5 Estimated Number of Project Workers

A precise headcount of contracted and primary supply workers cannot be established at this stage because civil works contracts for community garden infrastructure and postharvest facilities have not yet been tendered. Indicative planning figures from the draft Project Paper and ESMF are: 30 community vegetable gardens of 5 to 10 hectares each across the project counties; up to three functional aggregation hubs, pack houses or cold storage facilities; and a beneficiary population of approximately 7,000 to 7,500 direct smallholder farmers (the Concept ESRS and ESMF cite 7,000 while the draft Project Paper results framework cites 7,500 to 15,000 depending on the indicator; this discrepancy should be reconciled during appraisal), of whom at least 60 percent are targeted to be women. The PIU will update the workforce estimate in this LMP once civil works packages are defined and bidding documents issued, and will maintain a labor influx and workforce register for each active contract.

3.0 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The project's overall labor risk profile is assessed as moderate, consistent with the Project Paper. The SEA/SH risk rating is substantial, requiring heightened mitigation measures.

3.1 Occupational Health and Safety (OHS) Risks

- Construction risks associated with boreholes, water storage tanks, irrigation networks, greenhouses, multipurpose sheds, sanitary facilities, and postharvest infrastructure include falls, trips, manual-handling injuries, electrical hazards from solar pumping installations, and excavation hazards.
- Agrochemical use in community gardens that may cause skin and eye contact, inhalation and accidental ingestion of pesticides, bio-pesticides and fertilizers. , These risks are addressed jointly through this LMP and the SUPAWEP Fertilizer and Pest Management Plan (Integrated Pest Management Plan).
- Animal and vector-related hazards during land preparation and garden maintenance: snake bites, insect stings.

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- Heat stress and dehydration among field workers given Liberia's tropical climate.

3.2 Child Labor and Minimum Age

Liberia's Children's Act (2011) sets the minimum age for employment and prohibits hazardous work by children. Given that poorer households in project communities may rely on child labor for agricultural tasks, and that community gardens double as family and social spaces (the design of Component 1 explicitly provides shelters where women bring their children), there is a risk that children could be present at or engaged in garden work, including hazardous tasks such as pesticide handling, using sharp manual tools and power tools, exposure to extreme weather conditions and carrying heavy load; This risk is assessed as low but not negligible, and is addressed through the minimum age and hazardous work provisions in Section 6 below.

3.3 Forced Labor

No indications of forced labor practices in Liberia's agricultural sector directly relevant to SUPAWEP have been identified; nonetheless, the LMP prohibits forced labor, debt bondage and trafficked labor in all project-related work, consistent with ESS2.

3.4 Gender-Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment (GBV/SEA-SH)

The Concept ESRS rates the project's SEA/SH risk as substantial. The project will primarily engage women and bring project workers (including contractor involved in infrastructure works) into close contact with vulnerable women and communities. It will also operate in counties where the draft ESMF reports spousal violence prevalence of 36 to 61 percent and female genital mutilation prevalence ranging from 42 percent in Nimba to 78 percent in Gbarpolu/Bomisubject to confirmation of the final county list.

3.5 Labor Disputes and Working Conditions

- Non-payment or delayed payment of wages by contractors or subcontractors;
- Disagreement over hours, overtime and working conditions;
- Retaliation against workers who raise legitimate grievances about unsafe or unhealthy conditions;
- Labor influx effects on host communities where contractor workforces are mobilized from outside the immediate project area.

3.6 Discrimination and Exclusion

Given high unemployment and underemployment in project counties, there is a risk that women, youth, persons with disabilities and other vulnerable or disadvantaged groups could be excluded from paid employment opportunities generated by project works, notwithstanding the project's overall gender-inclusive design objective.

4.0 OVERVIEW OF APPLICABLE LABOR LEGISLATION

4.1 Liberian National Legal Framework

- **The Decent Work Act, 2015:** Liberia's principal labor law, governing contracts of employment, wages, hours of work, termination, occupational safety and health, freedom of association, and non-discrimination. All project workers engaged directly or through contractors will be covered by the terms of this Act.
- **The Children's Act, 2011:** Sets the minimum age for employment and prohibits child labor in hazardous work. No person under the age of 18 will be employed or otherwise engaged to work under SUPAWEP.
- **The Public Health Law, 1976:** Places obligations on employers regarding environmental sanitation and occupational health in workplaces, relevant to agro-chemical handling and construction sites.
- **The National Environmental and Occupational Health Policy, 2010:** Provides guidelines and standards for occupational health services and workplace conditions.
- **The Liberia Labor Practices Law and the Employment Injury Scheme administered under the National Social Security and Welfare Corporation (NASSCORP):** Cover workplace injury compensation for registered employers and employees.

4.2 World Bank Environmental and Social Standard 2 (ESS2)

ESS2 requires fair and non-discriminatory treatment of project workers, equal opportunity, and the prohibition of forced and child labor. It also requires appropriate occupational health and safety measures, protection for all project workers—including migrant, contracted, and community workers—a functioning worker grievance mechanism, and suitable labor management provisions for contractors, subcontractors, and primary suppliers. Where national law and ESS2 differ, the project will apply the requirement that provides greater worker protection. Consistent with ESS2, the Project's Code of Conduct (CoC) sets out clear standards for worker conduct, safety, and compliance, reinforcing these requirements and accountability throughout project implementation.

4.3 International Labor Standards

- ILO Convention 138 (Minimum Age) and Convention 182 (Worst Forms of Child Labor);
- ILO Convention 29 and Convention 105 (Forced Labor);
- ILO Convention 100 and Convention 111 (Equal Remuneration and Discrimination);
- ILO Convention 184 (Safety and Health in Agriculture);
- ILO Convention 87 and Convention 98 (Freedom of Association and Collective Bargaining), recognizing that Liberian law and prevailing practice govern the extent of formal workers' organizations available to project workers.

5.0 RESPONSIBLE STAFF

Overall responsibility for implementation of this LMP rests with the MoA through the PIU. The following table sets out lead responsibilities.

Function	Responsible Party	Key Tasks

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Overall LMP oversight	PIU Gender & Social Development Specialist, in coordination with the Environmental Specialist	Day-to-day implementation, monitoring and updating of the LMP; liaison with MoLE and NASSCORP
Direct worker (PIU staff) management	PIU NPC and Prog /Officer , PIU Fiduciary team, and M&E	Recruitment, contracts, code of conduct signature, disciplinary matters
Contracted worker (civil works) management	Contractors, supervised by PIU Infrastructure Specialist	Contractor-specific labor management procedures, OHS plans, code of conduct, worker grievance mechanism at site level
Community worker / FBO liaison	PIU with Cooperatives Development Agency (CDA)	Orientation of community garden groups and FBOs on minimum age, OHS and GRM provisions
GBV/SEA-SH risk management	PIU Social Development Specialist / GBV Specialist	SEA/SH action plan implementation, code of conduct training & periodic sensitization, referral pathways
Grievance handling (worker grievances)	PIU Social Development Specialist / GBV Specialist	Logging, investigation and resolution of worker grievances within stipulated timeframes

6.0 POLICIES AND PROCEDURES

6.1 Terms and Conditions of Employment

All direct and contracted workers will receive written contracts and timely wages, with only lawful deductions, in compliance with the Decent Work Act (2015).

6.2 Non-Discrimination and Equal Opportunity

The project will promote non-discrimination and actively encourage participation by women, youth, and persons with disabilities. Contractors must report the gender composition of their workforce.

6.3 Minimum Age of Employment and Prohibition of Child Labor

No person under the age of 18 years will be employed or otherwise engaged to work under SUPAWEP, whether as a direct worker, contracted worker, primary supply worker, or in a community garden context. Contractors will be required to establish and document an age verification process (review of national identification or birth documentation) prior to engaging any worker, as a condition of their contract with the PIU. Where community garden facilities include shelters for women who bring young children on site, the project will ensure that children present are kept away from areas where agrochemicals are stored, mixed or applied, and away from active construction or irrigation-equipment operation zones. A designated elder should look after the children while the women are working.

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6.4 Prohibition of Forced Labor

Forced labor, including bonded or trafficked labor, is prohibited in all project-related work. Contractors will not withhold identity documents, charge recruitment fees to workers, or impose conditions that restrict a worker's freedom of movement or right to terminate employment on reasonable notice.

6.5 Occupational Health and Safety

Contractors must prepare site-specific OHS plans prior to mobilization. PPE, potable water, shaded rest areas, and first-aid kits are mandatory.

Specific measures include:

- Contractors to prepare and implement site-specific OHS plans covering excavation, working at height, electrical safety for solar installations, and manual handling, prior to mobilization;
- Provision and mandatory use of appropriate personal protective equipment (PPE) for all workers engaged in construction, irrigation-system installation, and agro-chemical handling, at no cost to the worker;
- Occupational health and safety (OHS) training for workers—including community garden members and extension staff—on the safe handling, storage, and disposal of pesticides and biopesticides, in accordance with the SUPAWEP Fertilizer and Pest Management Plan;
- First aid provision and emergency response arrangements at construction sites and community gardens, including access to chemical neutralizers and first aid kits for garden groups, consistent with RETRAP practice;
- Incident and accident reporting requirements for contractors, with serious incidents reported to the PIU Environmental and Social Specialists within 24 hours;
- Provision of potable water, sanitary facilities and shaded rest areas at work and garden sites, reflecting Liberia's tropical climate.

6.6 Workers' Organizations

Project workers will not be restricted from lawfully forming or joining workers' organizations of their choosing, and from bargaining collectively, in accordance with national law. The PIU will not interfere with the lawful and peaceful exercise of these rights by contractor employees.

6.7 Code of Conduct and GBV/SEA-SH Prevention

Given the project's substantial SEA/SH risk rating, all direct and contracted workers, as well as community garden facilitators, must sign a Workers' Code of Conduct that sets the ethical standards they must follow. The Gender and Social Development Specialist will provide training and sensitization to ensure that workers understand the Code of Conduct and the consequences of noncompliance. This will prohibit sexual exploitation and abuse, sexual harassment, and any form of gender-based violence before work commences. Contractors will be contractually obligated to ensure that their workforce, including subcontractors, receives GBV/SEA-SH awareness training

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before mobilization to community sites. Reports of GBV/SEA-SH will be handled through the confidential, survivor-centered referral pathway established under the project's SEA/SH Action Plan, in coordination with the Grievance Redress Mechanism described in Section 8. Breach of the Code of Conduct will be grounds for disciplinary action, up to and including termination and referral to the appropriate authorities.

6.8 Labor Influx Management

When contractors mobilize external workers, they must prepare proportionate labor-influx management plans covering accommodation, community relations, and GBV/SEA/SH prevention.

7.0 MANAGEMENT OF CONTRACTED AND PRIMARY SUPPLY WORKERS

Bidding documents and contracts for all civil works and major goods supply under Components 1 and 2 will incorporate: (i) a requirement to comply with this LMP and applicable Liberian labor law; (ii) a requirement to prepare contractor-specific labor management procedures, including an age verification process, prior to mobilization; (iii) a requirement to sign and enforce the project Workers' Code of Conduct; (iv) OHS plan requirements; and (v) a requirement to establish and maintain a site-level worker grievance mechanism feeding into the project GRM. The PIU Procurement Specialist, working with the Infrastructure and Social Development Specialists, will ensure these provisions are included in standard bidding documents and will monitor contractor compliance through site supervision.

For primary suppliers identified as carrying significant labor risk (Section 2.3), the PIU will, on a risk-proportionate basis, seek assurance from suppliers regarding their labor practices, and will not knowingly contract with suppliers found to be using forced or child labor.

8.0 GRIEVANCE MECHANISM FOR PROJECT WORKERS

A dedicated worker grievance mechanism, separate from but coordinated with the broader project GRM described in the SUPAWEP Stakeholder Engagement Plan, will be available to all direct and contracted workers, free of charge, without retaliation. Community garden members and FBO members engaged in project-related labor will also have access to this mechanism.

Aggrieved parties may submit complaints via the toll-free grievance line, by text message, by email, or in person. Anonymous complaints are accepted to protect complainants.
This information will be included in the Information, Education, and Communication (IEC) materials distributed in project implementation areas during and after sensitization activities.

Step	Action	Timeframe
1	Receive and register grievance	Within 24 hours
2	Acknowledge, assess and assign responsibility for investigation	Within 5 working days
3	Investigate and propose resolution	Within 10 working days

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4	Communicate outcome to complainant and close grievance	Within 5 working days of resolution
5	Escalate to PIU / refer to police where unresolved or criminal in nature	As required

9.0 MONITORING, REPORTING AND CAPACITY BUILDING

The SUPAWEP M&E framework will integrate labor indicators, including workforce composition, OHS incidents, and project-related grievances, and track them via the Geo-Enabling Initiative for Monitoring and Supervision (GEMS). Cross-references to the PIM Annexes (Annex 4: Matching Grants, Annex 9: Beneficiary Targeting, Annex 10: Site Selection, and Annex 11: PIU TORs) will guide implementation.

The PIU Gendeer & Social Development Specialist and Environmental Specialist will jointly monitor implementation of this LMP through:

- Periodic site visits to community gardens and civil works sites, including review of contractor OHS and labor records;
- Review of contractor incident reports, worker grievance logs, and age verification records;
- Inclusion of labor management indicators in the project's routine progress reports to the World Bank, including number of workers engaged (disaggregated by sex and worker category), number of OHS incidents, and number and status of worker grievances;
- Orientation and refresher trainings for PIU staff, county Focal Persons, contractors and FBO leadership on the requirements of this LMP, delivered jointly with training on the SUPAWEP Fertilizer and Pest Management Plan and the SEA/SH Action Plan.

This LMP will be reviewed and updated, as necessary, prior to appraisal and at key implementation milestones, including once civil works contracts are awarded and the actual composition of the project workforce is known.

10.0 INDICATIVE BUDGET

The LMP implementation costs are included in Component 3 (Project Management). Dedicated budget lines cover the recruitment and training of GBV/SEA/SH specialists, PPE, and GRM operations.

Item / Activity	**Estimated Cost (US$)**
Recruitment of Social Development Specialist / GBV Specialist (cost shared with SEA/SH Action Plan)	Included in Component 3 staffing budget
Training of PIU staff, county Focal Persons and contractors on LMP, code of conduct and OHS	15,000
Orientation of community garden groups and FBOs on minimum age, OHS and GRM provisions	10,000

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PPE and first aid kits for community gardens	12,000
Grievance mechanism operation (materials, registers, county-level logistics)	8,000
Monitoring and reporting (site visits, review missions)	10,000
Total (indicative)	**55,000**

NOTE ON SOURCE DATA AND DISCREPANCIES

This LMP has been prepared from the SUPAWEP Concept Environmental and Social Review Summary (dated 4 April 2025), the draft SUPAWEP Environmental and Social Management Framework (dated 2 February 2026), and the draft SUPAWEP Project Paper (dated 27 January), supplemented by reference to the certified RETRAP Integrated Pest Management Plan and RETRAP institutional arrangements given the shared PIU. Figures and lists that differ across these source documents, namely the sixth project county (Gbarpolu or Bomi), total project cost (US$5.0 million against US$5.56 million), beneficiary numbers (7,000 against 7,500 to 15,000 depending on indicator), and implementation duration and closing date, have been flagged in the text above rather than silently reconciled, and should be confirmed with the PIU and the World Bank task team before this LMP is finalized and disclosed.

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