

REGIONAL

Organisation of Eastern Caribbean States (OECS)

CARIBBEAN DIGITAL TRANSFORMATION PROGRAM (CARDTP)

Draft ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

May 8, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Organisation of Eastern Caribbean States (OECS) will implement the Caribbean Digital Transformation Program (the **Project**). The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. The OECS will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The OECS will also comply with the provisions of any other Environmental and Social (E&S) documents required under the ESSs and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and the timelines specified in those E&S documents.
4. The OECS is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the OECS as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the OECS, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the OECS will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the OECS. The OECS will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the OECS shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Submitted to the Association semiannually during the implementation of the Project.</p> <p>The first report must be presented 6 months after the Project’s Effective Date.</p>	OECS
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including inappropriate disposal of hazardous wastes, construction accidents that result in death, serious or multiple injury, events of acute pollution due to air or noise emissions. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association of any incident or accident within 48 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within the timeframe established by the Association following the initial notification.</p>	OECS
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish an organizational structure within the Project Implementation Unit (PIU) housed in the OECS with qualified staff to support the management of ESHS risks of the Project. This will include, as a minimum (to be evaluated and adjusted during Project implementation, in consultation with the Association: An environmental and social specialist with qualifications and experience acceptable to the Association. Other specialists as Project Manager, Grants Manager, Procurement Specialist will also be part of the PIU.</p>	<p>The environmental and social specialist will be contracted or appointed no later than 60 days after the Project Effective Date.</p> <p>It must be maintained throughout the implementation of the Project.</p>	OECS
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Update, finalize, adopt, disclose and implement an Environmental and Social Management Framework (ESMF), which shall include an Environmental and Social Assessment (ESA) for the Project, as appropriate, in a manner acceptable to the Association.</p>	<p>The ESMF/ESA shall be adopted and disclosed, in a manner acceptable to the Association no later than 60 days after the Project Effective Date.</p> <p>The ESMF will be implemented throughout Project implementation.</p>	OECS
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt, and implement the Labor Management Procedures (LMP) including, inter alia, occupational, health and safety (OHS) measures that have been developed for the Project, in a manner acceptable to the Association.</p>	<p>The LMP shall be adopted, in a manner acceptable to the Association, no later than 60 days after the Project Effective Date.</p> <p>The LMP will be implemented throughout Project implementation.</p>	OECS
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation.</p>	OECS
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	WASTE MANAGEMENT PLAN: Prepare, adopt, and implement a Waste Management Plan as part of the ESMF for the Project, which shall include measures to, inter alia, manage hazardous and non-hazardous wastes and e-wastes.	Same timeframes as for the preparation and implementation of the ESMF, under action 1.2.	OECS
ESS 4: COMMUNITY HEALTH AND SAFETY			
Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to assess and manage specific risks and impacts to the community, and traffic and road safety risks.			
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
ESS 5 is currently not relevant			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to ensure that activities do not take place on or adversely impact biodiversity and environmentally sensitive areas, particularly natural or critical habitats.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
ESS 7 is currently not relevant			
ESS 8: CULTURAL HERITAGE			
Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to implement chance find procedures.			
ESS 9: FINANCIAL INTERMEDIARIES			
ESS 9 is currently not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: Prepare, disclose, consult, update, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, as appropriate, in a manner acceptable to the Association.	The draft SEP shall be consulted, updated, adopted and disclosed, in a manner acceptable to the Association, no later than 60 days after the Project Effective Date. The SEP will be implemented throughout Project implementation.	OECS

THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	<p>PROJECT GRIEVANCE MECHANISM:</p> <p>1. Establish, maintain and operate a grievance mechanism, as described in the SEP.</p> <p>2. Provide quarterly reports to the Association on the functioning of the GRM.</p>	<p>1. Same timeframe than action 10.1. Maintained and operated throughout Project implementation.</p> <p>2. Submit to the Association quarterly monitoring reports throughout Project implementation. The first report should be submitted 3 months after the Project Effective Date.</p>	OECS
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training to be provided for PIU staff and key stakeholders on:</p> <ul style="list-style-type: none"> • Environmental and Social Standards (ESS 1-10) • Environmental, Health and Safety Guidelines • Stakeholder Engagement Plan • Grievance Redress Mechanism 	<p>On commencement of PIU staff, especially, Project Manager, Grants Manager, Procurement Specialist, and Environment and Social Specialists.</p>	OECS

COMMONWEALTH OF DOMINICA

CARIBBEAN DIGITAL TRANSFORMATION PROGRAM (CARDTP)

Draft ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

May 12, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Commonwealth of Dominica will implement the Caribbean Digital Transformation Program (the **Project**), with the involvement of the Ministry of Public Works and the Digital Economy (MPWDE). The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. The Commonwealth of Dominica will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Commonwealth of Dominica will also comply with the provisions of any other Environmental and Social (E&S) documents required under the ESSs and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Environmental and Social Management Plans (ESMPs), Indigenous Peoples Planning Framework/Plan (IPPF/IPP), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and the timelines specified in those E&S documents.
4. The Commonwealth of Dominica is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the Commonwealth of Dominica as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the Commonwealth of Dominica, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Commonwealth of Dominica, through the Minister responsible for the MPWDE, will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Minister responsible for the MPWDE. The MPWDE will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Commonwealth of Dominica shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Submitted to the Association semiannually during the implementation of the Project.</p> <p>The first report must be presented 6 months after the Project’s Effective Date.</p>	MPWDE
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, inappropriate disposal of hazardous wastes, construction accidents that result in death, serious or multiple injury, events of acute pollution due to air or noise emissions. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association of any incident or accident within 48 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within the timeframe established by the Association following the initial notification.</p>	MPWDE
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>MPWDE will require contractors, including any supervising entities and consultants, to provide monthly reports on environmental, social, health and safety aspects to MPWDE. Such monthly reports shall be submitted by MPWDE to the Association, upon request.</p>	<p>At the request of the Association.</p>	MPWDE
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish an organizational structure within the Project Implementation Unit of MPWDE with qualified staff to support the management of ESHS risks of the Project. This will include, as a minimum (to be evaluated and adjusted during Project implementation, in consultation with the Association): An environmental and social specialist with qualifications and experience acceptable to the Association.</p>	<p>The environmental and social specialist will be contracted or appointed no later than 30 days after the Project Effective Date. It must be maintained throughout the implementation of the Project</p>	MPWDE
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT AND FRAMEWORK (ESMF)</p> <p>Finalize, adopt, disclose and implement an Environmental and Social Framework (ESMF) which shall include an Environmental and Social Assessment (ESA) for the Project, as appropriate, in a manner acceptable to the Association.</p>	<p>The ESMF shall be finalized, adopted and disclosed, in a manner acceptable to the Association no later than 60 days after the Project Effective Date.</p> <p>The ESMF will be implemented throughout Project implementation.</p>	MPWDE
1.3	<p>ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS</p> <p>Screen any proposed subproject and other Project activities in accordance with the ESMF prepared for the Project, and, thereafter, prepare, adopt, disclose and implement any Environmental and Social Management Plans (ESMP), as required, in a manner acceptable to the Association.</p> <p>Any activities that would fall within the exclusion/ineligibility criteria of the ESMF shall not be supported. The exclusion criteria in ESMF includes, inter alia, subprojects or Project activities that would involve permanent or temporary physical and economic displacement resulting from land acquisition or restrictions as specified under ESS5.</p>	<p>The ESMPs will be prepared and submitted for the Association's review and approval, and thereafter adopted and disclosed prior to launching the procurement process for the respective civil works and will be implemented throughout the execution of said works. The ESMPs will be included in the contracts.</p> <p>The ESMPs will be implemented throughout the execution of the respective works.</p>	MPWDE

THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Ensure that all contractors have the necessary capacity to comply with the corresponding ESMPs and the Project's Labor Management Procedures throughout their contract. This includes:</p> <ul style="list-style-type: none"> Ensuring that the procurement documents include the necessary technical specifications for the adequate handling of issues contained in the ESMPs and Labor Management Procedures. Ensuring that contractors have the necessary staff and capacity during the execution of the works to comply with said instruments. 	<p>During the term of all contractual activities of the Project, including:</p> <ul style="list-style-type: none"> Prior to the preparation of procurement documents. Before mobilization of each contractor, and maintained throughout the construction period. 	MPWDE
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project, in a manner acceptable to the Association.</p>	<p>The LMP shall be adopted, in a manner acceptable to the Association, no later than 60 days after the Project Effective Date.</p> <p>The LMP will be implemented throughout Project implementation.</p>	MPWDE
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation.	MPWDE
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures including measures on emergency preparedness and response, as part of the development and implementation of Project activities and the ESMPs, in accordance with the guidelines contained in the ESMF and LMP.</p>	Same timeframe as action 1.3 above.	MPWDE
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	WASTE MANAGEMENT PLAN: Prepare, adopt, and implement a Waste Management Plan as part of the ESMF for the Project, which shall include measures to, inter alia, manage hazardous and non-hazardous wastes and e-wastes. These measures will be part of the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as action 1.3 above.	MPWDE
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures will be covered under the ESMPs, as necessary.	Same timeframe as action 1.3 above.	MPWDE
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMP to be developed in accordance with the guidelines contained in the ESMF.	Same timeframe as action 1.3 above.	MPWDE
4.2	COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from subproject activities, and include these measures in the ESMP.	Same timeframe as action 1.3 above.	MPWDE
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT ESS 5 is currently not relevant			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES ESS 6 is currently not relevant			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
7.1	INDIGENOUS PEOPLES PLAN: Prepare, consult, disclose, adopt and implement Indigenous Peoples Plans (IPPs) consistent with the requirements of the Indigenous Peoples Planning Framework (IPPF) that has been prepared for the Project and ESS7, in a manner acceptable to the Association.	The IPPF shall be finalized, adopted and disclosed, in a manner acceptable to the Association no later than 60 days after the Project Effective Date. IPP shall be prepared once the specific activities for which is needed are identified, and prior to the implementation of these activities. The IPP will be implemented throughout Project implementation.	MPWDE
7.2	GRIEVANCE MECHANISM: Prepare, adopt, and implement the arrangements for indigenous people as required under the IPPF and further describe such arrangements in the respective IPP. This will be an adaptation of the grievance mechanism for the Commonwealth of Dominica described in the SEP, to address the specificity of indigenous communities.	Same timeframe than action 7.1 above.	MPWDE
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS: Prepare, adopt, and implement the chance finds procedure described in the ESMFs to be prepared in accordance with the ESMF.	Same timeframe as action 1.3 above.	MPWDE
ESS 9: FINANCIAL INTERMEDIARIES ESS 9 is currently not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: Prepare, disclose, consult, update, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, as appropriate, in a manner acceptable to the Association.	The draft SEP shall be consulted, updated, adopted and disclosed, in a manner acceptable to the Association, no later than 60 days after the Project Effective Date. The SEP will be implemented throughout Project implementation.	MPWDE

THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	<p>PROJECT GRIEVANCE MECHANISM:</p> <p>1. Establish, maintain and operate a grievance mechanism (GRM), as described in the SEP.</p> <p>2. Provide quarterly reports to the Association on the functioning of the GRM</p>	<p>1. Same timeframe than action 10.1. Once established, the GRM will be operational throughout Project implementation.</p> <p>2. Submit to the Association quarterly monitoring reports throughout Project implementation. The first report should be submitted 3 months after the Project Effective Date.</p>	MPWDE
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training to be provided for PIU staff and key stakeholders (e.g. MPWDE) on:</p> <ul style="list-style-type: none"> • Environmental and Social Standards (ESS 1-10) • Environmental, Health and Safety Guidelines • Stakeholder Engagement Plan • Grievance Redress Mechanism 	<p>Training for direct Project workers will be conducted before the start of works. Training will thereafter continue throughout Project implementation.</p> <p>Training of PIU staff will be conducted within 60 days of action 1.1.</p>	MPWDE
CS2	<p>Training for Project contractors/workers on E-waste, occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</p>	<p>Prior to the start of works.</p>	MPWDE

GRENADA

CARIBBEAN DIGITAL TRANSFORMATION PROGRAM (CARDTP)

Draft ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

May 8, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Grenada will implement the Caribbean Digital Transformation Program (the **Project**), with the involvement of the Ministry of National Security, Public Administration, Home Affairs and ICT (MNSPAHAICT). The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. Grenada will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. Grenada will also comply with the provisions of any other E&S documents required under the ESSs and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Environmental and Social Management Plans (ESMPs), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and the timelines specified in those E&S documents.
4. Grenada is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in one above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by Grenada as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and Grenada, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Grenada, through the Minister responsible for the MNSPAHAICT, will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Minister responsible for the MNSPAHAICT. The MNSPAHAICT will promptly disclose the updated ESCP.
7. Where there are Project changes, unforeseen circumstances, or Project performance results in changes to the risks and impacts during Project implementation, Grenada shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, and functioning of the Grievance Redress Mechanism.</p>	<p>Submitted to the Association semiannually during the implementation of the Project.</p> <p>The first report must be presented 6 months after the Project's Effective Date.</p>	MNSPAHAICT
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, inappropriate disposal of hazardous wastes, construction accidents that result in death, serious or multiple injury, events of acute pollution due to air or noise emissions. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association of any incident or accident within 48 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within the timeframe established by the Association following the initial notification.</p>	MNSPAHAICT
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>MIDPUTI will require contractors, including any supervising entities and consultants, to provide monthly reports on environmental, social, health and safety aspects to MNSPAHAICT. Such monthly reports shall be submitted by MNSPAHAICT to the Association, upon request.</p>	<p>At the request of the Association.</p>	MNSPAHAICT
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish an organizational structure within the Project Implementation Unit of MNSPAHAICT with qualified staff to support the management of ESHS risks of the Project. This will include, as a minimum (to be evaluated and adjusted during Project implementation, in consultation with the Association): An environmental and social specialist with qualifications and experience acceptable to the Association.</p>	<p>The environmental and social specialist will be contracted or appointed no later than 60 days after the Project Effective Date. It must be maintained throughout the implementation of the Project</p>	MNSPAHAICT
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT AND FRAMEWORK (ESMF)</p> <p>Finalize, adopt, disclose and implement an Environmental and Social Framework (ESMF) which shall include an Environmental and Social Assessment (ESA) for the Project, as appropriate, in a manner acceptable to the Association.</p>	<p>The ESMF shall be finalized, adopted and disclosed, in a manner acceptable to the Association no later than 60 days after the Project Effective Date.</p> <p>The ESMF will be implemented throughout Project implementation.</p>	MNSPAHAICT
1.3	<p>ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS</p> <p>Screen any proposed subproject and other Project activities in accordance with the ESMF prepared for the Project, and, thereafter, prepare, adopt, disclose and implement any Environmental and Social Management Plans (ESMP), as required, in a manner acceptable to the Association.</p> <p>Any activities that would fall within the exclusion/ineligibility criteria of the ESMF shall not be supported. The exclusion criteria in ESMF includes, inter alia, subprojects or Project activities that would involve permanent or temporary physical and economic displacement resulting from land acquisition or restrictions as specified under ESS5.</p>	<p>The ESMPs will be prepared and submitted for the Association’s review and approval, and thereafter adopted and disclosed prior to launching the procurement process for the respective civil works and will be implemented throughout the execution of said works. The ESMPs will be included in the contracts.</p> <p>The ESMPs will be implemented throughout the execution of the respective works.</p>	MNSPAHAICT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Ensure that all contractors have the necessary capacity to comply with the corresponding ESMPs and the Project’s Labor Management Procedures throughout their contract. This includes:</p> <ul style="list-style-type: none"> Ensuring that the procurement documents include the necessary technical specifications for the adequate handling of issues contained in the ESMPs and Labor Management Procedures. Ensuring that contractors have the necessary staff and capacity during the execution of the works to comply with said instruments. 	<p>During the term of all contractual activities of the Project, including:</p> <ul style="list-style-type: none"> Prior to the preparation of procurement documents. Before mobilization of each contractor, and maintained throughout the construction period. 	MNSPAHAICT
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project, in a manner acceptable to the Association.</p>	<p>The LMP shall be adopted, in a manner acceptable to the Association, no later than 60 days after the Project Effective Date.</p> <p>The LMP will be implemented throughout Project implementation.</p>	MNSPAHAICT
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Grievance mechanism operational prior to the engagement of Project workers and maintained throughout Project implementation.	MNSPAHAICT
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures including measures on emergency preparedness and response, as part of the development and implementation of Project activities and the ESMPs, in accordance with the guidelines contained in the ESMF and LMP.</p>	Same timeframe as action 1.3 above.	MNSPAHAICT
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	<p>WASTE MANAGEMENT PLAN: Prepare, adopt, and implement a Waste Management Plan as part of the ESMF for the Project, which shall include measures to, inter alia, manage hazardous and non-hazardous wastes and e-wastes These measures will be part of the ESMP to be prepared in accordance with the ESMF.</p>	Same timeframe as action 1.3 above.	MNSPAHAICT
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures will be covered under the ESMPs as necessary.</p>	Same timeframe as action 1.3 above.	MNSPAHAICT
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed in accordance with the guidelines contained in the ESMF.</p>	Same timeframe as action 1.3 above.	MNSPAHAICT
4.2	<p>COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, including, site preparation, construction and rehabilitation, and include these measures in the ESMPs.</p>	Same timeframe as action 1.3 above.	MNSPAHAICT
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT ESS 5 is currently not relevant			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES ESS 6 is currently not relevant			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES ESS 7 is currently not relevant			
ESS 8: CULTURAL HERITAGE ESS 8 is currently not relevant			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 9: FINANCIAL INTERMEDIARIES ESS 9 is currently not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION: Prepare, disclose, consult, update, adopt and implement the Stakeholder Engagement Plan (SEP) for the Project, as appropriate, in a manner acceptable to the Association.	The draft SEP shall be consulted, updated, adopted and disclosed, in a manner acceptable to the Association, no later than 60 days after the Project Effective Date. The SEP will be implemented throughout Project implementation.	MNSPAHAICT
10.2	PROJECT GRIEVANCE MECHANISM: 1. Establish, maintain and operate a grievance mechanism (GRM), as described in the SEP. 2. Provide quarterly reports to the Association on the functioning of the GRM.	1. Same timeframe than action 10.1 above. Once established, the GRM will be operational throughout Project implementation. 2. Submit to the Association quarterly monitoring reports throughout Project implementation. The first report should be submitted 3 months after the Project Effective.	MNSPAHAICT
CAPACITY SUPPORT (TRAINING)			
CS1	Training to be provided for PIU staff and key stakeholders: <ul style="list-style-type: none"> • Environmental and Social Standards (ESS 1-10) • Labor Management Requirements-OHS National policy and legislations • Stakeholder Engagement Tools and Process Grievance Redress Mechanism-Conflict Resolution, Engagement of Project Affected Persons, etc.	Training for direct Project workers will be conducted before the start of works. Training will thereafter continue throughout Project implementation. Training of PIU staff will be conducted within 60 days of action 1.1	MNSPAHAICT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CS2	Training for Project contractors/workers on E-waste, occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.	Prior to the start of works.	MNSPAHAICT

SAINT LUCIA

CARIBBEAN DIGITAL TRANSFORMATION PROGRAM (CARDTP)

Draft ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

May 11, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Saint Lucia will implement the Caribbean Digital Transformation (the **Project**), with the involvement of the Ministry of Public Service, Information, and Broadcasting (MPSIB). The International Development Association (hereinafter referred to as the Association), has agreed to provide financing for the Project.
2. Saint Lucia will implement material measures and actions so that the Project is implemented in accordance with the approved Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. Saint Lucia will also comply with the provisions of any other Environmental and Social (E&S) documents required under the ESSs and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Environmental and Social Management Plans (ESMPs), Resettlement Policy Framework (RPF), Resettlement Action Plans (RAPs), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and the timelines specified in those E&S documents.
4. Saint Lucia is responsible for compliance for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by Saint Lucia as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and Saint Lucia, this ESCP may be revised as necessary during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, Saint Lucia, through the Minister responsible for the MPSIB, will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Minister responsible for the MPSIB. The MPSIB will promptly disclose the updated ESCP
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, Saint Lucia shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (EHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Submitted to the Association semiannually during the implementation of the Project.</p> <p>The first report must be presented 6 months after the Project's Effective Date.</p>	MPSIB
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, including inappropriate disposal of hazardous wastes, construction accidents that result in death, serious or multiple injury, events of acute pollution due to air or noise emissions. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association of any incident or accident within 48 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within the timeframe established by the Association following the initial notification.</p>	MPSIB
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>MEAPS/ MFEGJC will require contractors, including any supervising entities and consultants, to provide monthly reports on environmental, social, health and safety aspects to MPSIB. Such monthly reports shall be submitted by MPSIB to the Association, upon request.</p>	<p>At the request of the Association.</p>	MPSIB
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish an organizational structure within MPSIB with qualified staff to support the management of ESHS risks of the Project. This will include, as a minimum (to be evaluated and adjusted during Project implementation, in consultation with the Association): An environmental and social specialist with qualifications and experience acceptable to the Association.</p>	<p>The environmental and social specialist will be contracted or appointed, no later than 60 days after the Project Effective Date. It must be maintained throughout the implementation of the Project</p>	MPSIB
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT AND FRAMEWORK (ESMF)</p> <p>Finalize, adopt, disclose and implement an Environmental and Social Framework (ESMF) which shall include an Environmental and Social Assessment (ESA) for the Project, as appropriate, in a manner acceptable to the Association.</p>	<p>The ESMF shall be finalized, adopted and disclosed, in a manner acceptable to the Association no later than 60 days after the Project Effective Date.</p> <p>The ESMF will be implemented throughout Project implementation.</p>	MPSIB
1.3	<p>ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS</p> <p>Screen any proposed subproject and other Project activities in accordance with the ESMF prepared for the Project, and, thereafter, prepare, adopt, disclose and implement any Environmental and Social Management Plans (ESMP), as required, in a manner acceptable to the Association.</p> <p>Any activities that would fall within the exclusion/ineligibility criteria of the ESMF shall not be supported.</p>	<p>The ESMPs will be prepared and submitted for the Association’s review and approval, and thereafter adopted and disclosed prior to launching the procurement process for the respective civil works and will be implemented throughout the execution of said works. The ESMPs will be included in the contracts.</p> <p>The ESMPs will be implemented throughout the execution of the respective works.</p>	MPSIB

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Ensure that all contractors have the necessary capacity to comply with the corresponding ESMPs and the Project’s Labor Management Procedures throughout their contract. This includes:</p> <ul style="list-style-type: none"> Ensuring that the procurement documents include the necessary technical specifications for the adequate handling of issues contained in the ESMPs and Labor Management Procedures. Ensuring that contractors have the necessary staff and capacity during the execution of the works to comply with said instruments. 	<p>During the term of all contractual activities of the Project, including:</p> <ul style="list-style-type: none"> Prior to the preparation of procurement documents. Before mobilization of each contractor, and maintained throughout the construction period. 	MPSIB
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt, and implement the approved Labor Management Procedures (LMP) that has been developed for the Project.</p>	<p>The LMP shall be adopted, in a manner acceptable to the Association, no later than 60 days after the Project Effective Date.</p> <p>The LMP will be implemented throughout Project implementation.</p>	MPSIB
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation.	MPSIB
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures including measures on emergency preparedness and response, as part of the development and implementation of Project activities and the ESMPs, in accordance with the guidelines contained in the ESMF and LMP.</p>	Same timeframe as action 1.3 above.	MPSIB
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	<p>WASTE MANAGEMENT PLAN: Prepare, adopt, and implement a Waste Management Plan as part of the ESMF for the Project, which shall include measures to, inter alia, manage hazardous and non-hazardous wastes and e-wastes. These measures will be part of the ESMP to be prepared in accordance with the ESMF.</p>	Same timeframe as action 1.3 above.	MPSIB
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures will be covered under the ESMPs as necessary.</p>	Same timeframe as action 1.3 above.	MPSIB

ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed in accordance with the guidelines contained in the ESMF.</p>	Same timeframe as action 1.3 above.	MPSIB
4.2	<p>COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from subproject activities, and include these measures in the ESMPs.</p>	Same timeframe as action 1.3 above.	MPSIB
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

5.1	<p>RESETTLEMENT PLANS:</p> <p>1. Prepare, consult, disclose, adopt and implement a Resettlement Policy Framework consistent with ESS5, in a manner acceptable to the Association.</p> <p>2. Prepare, consult, disclose, adopt and implement resettlement plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF), and thereafter adopt and implement the respective RAPs before carrying out the associated activities, in a manner acceptable to the Association.</p>	<p>1. RPF shall be finalized, adopted and disclosed, in a manner acceptable to the Association no later than 60 days after the Project Effective Date.</p> <p>2. RAPs shall be submitted for the Association’s approval and, once approved, shall be implemented prior to commencing of Project activities that involve land acquisition and resettlement.</p>	MPSIB
5.2	<p>GRIEVANCE MECHANISM:</p> <p>Prepare, adopt and implement the arrangements for the grievance mechanism to address resettlement related complaints as described in the RPF, RAP and SEP.</p>	Same time frame than action 5.1 above.	MPSIB
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p> <p>Develop and implement procedures to ensure that civil works financed by the Project do not take place on or adversely impact biodiversity and environmentally sensitive areas, particularly in natural or critical habitats. These procedures will be part of the ESMPs to be prepared in accordance with the ESMF.</p>	Same timeframe as action 1.3 above.	MPSIB
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES ESS 7 is currently not relevant			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS:</p> <p>Prepare, adopt, and implement the chance finds procedure described in the ESMP to be prepared in accordance with the ESMF.</p>	Same timeframe as action 1.3 above.	MPSIB
ESS 9: FINANCIAL INTERMEDIARIES ESS 9 is currently not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: Prepare, disclose, consult, update, adopt, implement a Stakeholder Engagement Plan (SEP) for the Project, as appropriate, in a manner acceptable to the Association.</p>	<p>The draft SEP shall be consulted, updated, adopted and disclosed, in a manner acceptable to the Association, no later than 60 days after the Project Effective Date. The SEP will be implemented throughout Project implementation.</p>	MPSIB
10.2	<p>PROJECT GRIEVANCE MECHANISM: 1. Establish, maintain and operate a grievance mechanism (GRM), as described in the SEP. 2. Provide quarterly reports to the Association on the functioning of the GRM.</p>	<p>1. Same timeframe than action 10.1. Once established, the GRM will be operational throughout Project implementation. 2. Submit to the Association quarterly monitoring reports throughout Project implementation. The first report should be submitted 3 months after the Project Effective.</p>	MPSIB
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training to be provided for PIU staff and key stakeholders on:</p> <ul style="list-style-type: none"> ● Environmental and Social Standards (ESS 1-10) ● Environmental, Health and Safety Guidelines ● Stakeholder Engagement Plan ● Grievance Redress Mechanism 	<p>Training for direct Project workers will be conducted before the start of works. Training will thereafter continue throughout Project implementation. Training of PIU staff will be conducted within 60 days of action 1.1.</p>	MPSIB
CS2	<p>Training for Project contractors/workers on E-waste, occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</p>	<p>Prior to the start of works.</p>	MPSIB

SAINT VINCENT AND THE GRENADINES

CARIBBEAN DIGITAL TRANSFORMATION PROGRAM (CARDTP)

Draft ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

May 14, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Saint Vincent and the Grenadines will implement the Caribbean Digital Transformation Program (the **Project**), with the involvement of the Ministry of Finance, Economic Planning, Sustainable Development and Information Technology (MoFEPSDIT). The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. Saint Vincent and the Grenadines will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. Saint Vincent and the Grenadines will also comply with the provisions of any other E&S documents required under the ESSs and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Environmental and Social Management Plans (ESMPs), Resettlement Policy Framework (RPF), Resettlement Action Plans (RAPs), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and the timelines specified in those E&S documents.
4. Saint Vincent and the Grenadines is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by Saint Vincent and the Grenadines as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and Saint Vincent and the Grenadines, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, Saint Vincent and the Grenadines, through the Minister responsible for the MoFEPSDIT, will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the minister responsible for MoFEPSDIT. MoFEPSDIT will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, Saint Vincent and the Grenadines shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Submitted to the Association semiannually during the implementation of the Project.</p> <p>The first report must be presented 6 months after the Project’s Effective Date.</p>	MoFEPSDIT
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, including inappropriate disposal of hazardous wastes, construction accidents that result in death, serious or multiple injury, events of acute pollution due to air or noise emissions. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association of any incident or accident within 48 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within the timeframe established by the Association following the initial notification.</p>	MoFEPSDIT
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>MoFEPSDIT will require contractors, including any supervising entities and consultants, to provide monthly reports on environmental, social, health and safety aspects to MoFEPSDIT. Such monthly reports shall be submitted by MoFEPSDIT to the Association, upon request.</p>	<p>At the request of the Association.</p>	MoFEPSDIT
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE Establish an organizational structure within MoFEPSDIT with qualified staff to support the management of ESHS risks of the Project. This will include, as a minimum (to be evaluated and adjusted during the Project implementation, in consultation with the Association): An environmental and social specialist with qualifications and experience acceptable to the Association.</p>	<p>The environmental and social specialist will be contracted or appointed, no later than 60 days after the Project Effective Date. It must be maintained throughout the implementation of the Project</p>	MoFEPSDIT
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT Finalize, adopt, disclose and implement an Environmental and Social Framework (ESMF) which shall include an Environmental and Social Assessment (ESA) for the Project, as appropriate, in a manner acceptable to the Association.</p>	<p>The ESMF shall be finalized, adopted and disclosed, in a manner acceptable to the Association no later than 60 days after the Project Effective Date.</p> <p>The ESMF will be implemented throughout Project implementation.</p>	MoFEPSDIT
1.3	<p>ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS Screen any proposed subproject and other Project activities in accordance with the ESMF prepared for the Project, and, thereafter, prepare, adopt, disclose and implement any Environmental and Social Management Plans (ESMP), as required, in a manner acceptable to the Association.</p> <p>Any activities that would fall within the exclusion/ineligibility criteria of the ESMF shall not be supported.</p>	<p>The ESMPs will be prepared and submitted for the Association’s review and approval, and thereafter adopted and disclosed prior to launching the procurement process for the respective civil works and will be implemented throughout the execution of said works. The ESMPs will be included in the contracts.</p> <p>The ESMPs will be implemented throughout the execution of the respective works.</p>	MoFEPSDIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Ensure that all contractors have the necessary capacity to comply with the corresponding ESMPs and the Project’s Labor Management Procedures throughout their contract. This includes:</p> <ul style="list-style-type: none"> Ensuring that the procurement documents include the necessary technical specifications for the adequate handling of issues contained in the ESMPs and Labor Management Procedures. Ensuring that contractors have the necessary staff and capacity during the execution of the works to comply with said instruments. 	<p>During the term of all contractual activities of the Project, including:</p> <ul style="list-style-type: none"> Prior to the preparation of procurement documents. Before mobilization of each contractor, and maintained throughout the construction period. 	MoFEPSDIT
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project, in a manner acceptable to the Association.</p>	<p>The LMP shall be adopted, in a manner acceptable to the Association, no later than 60 days after the Project Effective Date.</p> <p>The LMP will be implemented throughout Project implementation.</p>	MoFEPSDIT
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation.	MoFEPSDIT
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures including measures on emergency preparedness and response, as part of the development and implementation of project activities and the ESMPs, in accordance with the guidelines contained in the ESMF and LMP.</p>	Same timeframe as action 1.3 above.	MoFEPSDIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN: Prepare, adopt, and implement a Waste Management Plan as part of the ESMF for the Project, which shall include measures to, inter alia, manage hazardous and non-hazardous wastes and e-wastes. These measures will be part of the ESMP to be prepared in accordance with the ESMF.	Same timeframes as action 1.3 above.	MoFEPSDIT
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures will be covered under the ESMPs as necessary.	Same timeframe as action 1.3 above.	MoFEPSDIT
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed in accordance with the guidelines contained in the ESMF.	Same timeframe as action 1.3 above.	MoFEPSDIT
4.2	COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, including, site preparation, construction and rehabilitation, and include these measures in the ESMPs.	Same timeframe as action 1.3 above.	MoFEPSDIT
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

5.1	<p>RESETTLEMENT PLANS:</p> <p>1. Prepare, consult, disclose, adopt and implement a Resettlement Policy Framework consistent with ESS5, in a manner acceptable to the Association.</p> <p>2. Prepare, consult, disclose, adopt and implement resettlement plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF), and thereafter adopt and implement the respective RAPs before carrying out the associated activities, in a manner acceptable to the Association.</p>	<p>1. RPF shall be finalized, adopted and disclosed, in a manner acceptable to the Association no later than 60 days after the Project Effective Date.</p> <p>2. RAPs shall be submitted for the Association’s approval and, once approved, shall be implemented prior to commencing of Project activities that involve land acquisition and resettlement.</p>	MoFEPSDIT
5.2	<p>GRIEVANCE MECHANISM:</p> <p>Prepare, adopt, and implement the arrangements for the grievance mechanism to address resettlement related complaints as described in the RPF, RAP and SEP.</p>	Same time frame than action 5.1 above.	MoFEPSDIT
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p> <p>Develop and implement procedures to ensure that civil works financed by the Project do not take place on or adversely impact biodiversity and environmentally sensitive areas, particularly in natural or critical habitats. These procedures will be part of the ESMPs to be prepared in accordance with the ESMF.</p>	Same timeframe as action 1.3 above.	MoFEPSDIT
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES ESS7 is not currently relevant			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS:</p> <p>Prepare, adopt and implement the chance finds procedure described in the ESMP to be prepared in accordance with the ESMF.</p>	Same timeframe as action 1.3 above.	MoFEPSDIT
ESS 9: FINANCIAL INTERMEDIARIES ESS 9 is currently not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: Prepare, disclose, consult, update, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, as appropriate, in a manner acceptable to the Association.</p>	<p>The draft SEP shall be consulted, updated, adopted and disclosed, in a manner acceptable to the Association, no later than 60 days after the Project Effective Date. The SEP will be implemented throughout Project implementation.</p>	MoFEPSDIT
10.2	<p>PROJECT GRIEVANCE MECHANISM: 1. Establish, maintain and operate a grievance mechanism, as described in the SEP. 2. Provide quarterly reports to the Association on the functioning of the GRM.</p>	<p>1. Same timeframe than action 10.1. Maintained and implemented throughout Project implementation. 2. Submit to the Association quarterly monitoring reports throughout Project implementation. The first report should be submitted 3 months after the Project Effective.</p>	MoFEPSDIT
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training to be provided for PIU staff and key stakeholders on:</p> <ul style="list-style-type: none"> • Environmental and Social Standards (ESS 1-10) • Environmental, Health and Safety Guidelines • Stakeholder Engagement Plan • Grievance Redress Mechanism 	<p>Training for direct Project workers will be conducted before the start of works. Training will thereafter continue throughout Project implementation. Training of PIU staff will be conducted within 60 days of action 1.1.</p>	MoFEPSDIT
CS2	<p>Training for Project contractors/workers on E-waste, occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.]</p>	<p>Prior to the start of works.</p>	MoFEPSDIT