2022

OECS DATA FOR DECISION MAKING PROJECT (P174986)

MAY 2022

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

OECS COMMISSION | Morne Fortune, Castries, Saint Lucia

LIST OF ACRONYMS

CERC	Contingency Emergency Response Component
CH	Cultural Heritage
CSO	Central Statistics Office
EEE	Electrical and Electronic Equipment
EHS	Environment, Health and Safety
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standards
GDP	Gross Domestic Product
GIF	Grievance Information Form
GM	Grievance Mechanism
GNI	Gross National Income
GSWMA	Grenada Solid Waste Management Authority
JSA	Job Safety Analysis
LMP	Labor Management Procedures
NEC	National Environmental Commission
NSO	National Statistical Office
NSS	National Statistical System
OECS	Organisation of Eastern Caribbean States
OHS	Occupational Health and Safety
OHSP	Occupational Health and Safety Plan
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PSIPMU	Public Sector Investment Programme Management Unit
RDGC	Regional Data Governance Council
SEP	Stakeholder Engagement Plan
SVG	Saint Vincent and the Grenadines
SWMA	Saint Lucia Solid Waste Management Authority
WBG	World Bank Group
WMP	Waste Management Plan

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ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

1 Introduction

This document represents the Environmental and Social Management Framework (ESMF) for the OECS Data for Decision Making Project (P174986). It provides guidance to the Organisation for Eastern Caribbean States (OECS) and the national governments of Grenada, Saint Lucia and Saint Vincent and the Grenadines (SVG) on the identification of the potential environmental and social risks of the project. Specifically, the project ESMF establishes the process and defines the roles and responsibilities for screening and addressing any environmental and social issue for any selected sub-project activities.

The ESMF has been developed in line with relevant national laws of Grenada, Saint Lucia and Saint Vincent and the Grenadines, the relevant World Bank Environmental and Social Standards (ESSs) and the World Bank Environment, Health and Safety (EHS) Guidelines. It will analyze the positive and negative, direct and indirect impacts of the project and define appropriate generic mitigation and management measures in accordance with the mitigation hierarchy (avoid, minimize, mitigate, offset/compensate). All sub-project activities will be screened against the criteria developed in the ESMF and consistent with the environmental and social risk classification to inform the selection process by the project team. The ESMF will also offer guidance to ensure that project activities to not exacerbate already existing patterns of social exclusion by establishing the process to identify the risk of same.

2 Project Description

The Project Development Objective (PDO) is to improve the statistical capacity of Participating Eastern Caribbean countries (i) to produce and publicly disseminate statistical data for country and regional level analytics; and (ii) to provide immediate and effective response to an Eligible Crisis Emergency.

2.1 Project Components

The project consists of four components as outlined in Table 2.1.

Table 2.1- Project components

Project Component	Description
Component 1: Statistical Modernization and Capacity Building	**This component will support the modernization of the national statistical system by supporting activities that will:** 1. Improve the institutional and technical capacity of the NSO to produce official statistics according to a statistical release calendar and producing official statistics. 2. Reinforce the national statistical system and its coordination across government ministries and agencies. 3. Modernize information and technology equipment to improve business continuity and the efficiency and quality of statistical operations from data collection to the dissemination of results; and 4. Promote the use of data and statistics and develop a user-oriented system that improves access.
	Subcomponent 1.1: National Statistical Office Development This subcomponent will support the strengthening of the organizational and technical capacity of NSOs to produce official statistics according to a statistical release calendar.
	Subcomponent 1.2: Strengthening the National Statistical System This subcomponent will support progress towards an effective National Statistical System (NSS), with the NSO at its core, to coordinate statistical activities across line ministries and respond to data priorities for policy making.
	Subcomponent 1.3: Information Technologies for Statistics This subcomponent will support the acquisition of Information Technology (IT) equipment, software, and accessories to increase efficiency and quality from survey preparation to data collection to dissemination.
	Subcomponent 1.4: Promoting Data Access and Use

Project Component	Description
	This subcomponent will support participating countries to improve public access to data and its use to advance development objectives.
Component 2: Data Collection, Analysis, and Dissemination	**This component will support the production of core data products central to the statistical system and some supplemental data to fill other key data gaps identified by participating countries.**
	Subcomponent 2.1: Core Data This subcomponent will support the production of core data collection activities to improve the frequency of data available to monitor and analyze demographic, social, and economic conditions. The core data production activities covered by this project are the following: (i) Population and Housing Census, (ii) Survey of Living Conditions, (iii) Labor Market Statistics, and (iv) Agricultural Census. This subcomponent provides an opportunity to directly improve the availability of sex-disaggregated data.
	Subcomponent 2.2: Supplemental Data This subcomponent aims to help fill other country specific data gaps, by supporting small surveys and/or technical assistance to produce supplemental data.
Component 3: OECS Regional Integration	**This component contributes to the OECS Commission's mandate for regional integration and strengthening of the Regional Statistical System by:** 1. Supporting the creation of the OECS Regional Data Governance Council in charge of providing guidance and harmonization of key data instruments and methodologies to improve quality and comparability of data across member states; 2. Developing and testing innovations suitable for small island states in the Eastern Caribbean; 3. Strengthening regional technical assistance to NSOs and NSSs; and 4. Supporting the generation of regional analytics and their dissemination.

Project Component	Description
	Subcomponent 3.1: OECS Regional Data Governance Council (RDGC) This sub-component will strengthen the OECS's data governance structure and capacity to harmonize, coordinate and integrate regional data by establishing the RDGC and supporting its operations.
	Subcomponent 3.2: Data Innovation for Small Island Developing States 1. This subcomponent will support experimentation of methodological innovations and alternative data that are promising for small island state contexts.
	Subcomponent 3.3: Regional Technical Assistance and Capacity Building This subcomponent aims to strengthen the capacity of the participating countries to produce high quality harmonized data by providing training and technical assistance to NSO and NSS staff.
	Subcomponent 3.4: Regional Data Aggregation, Analysis, and Dissemination This subcomponent will support the production of regional analytics drawing on the major data production activities financed by this project.
Component 4: Project Implementation	**This component will support project implementation in each country and at the OECS Commission.**
Component 5 – Contingency Emergency Response Component (CERC)	This zero-cost component aims to provide immediate surge funding in the event of a eligible national emergency. The CERC is only triggered in the case of a public emergency and when certain actions, as agreed by the Government and Bank teams, are met. The project will develop CER manual that will be required in case there is the need to activate the CERC component. Based on this manual, a CERC ESMF will be prepared to set out the environmental and social requirements that will be applicable to the set of expenditures eligible for financing under this

Project Component	Description
	component. The timeline for the preparation of the CERC-ESMF has been included in the Project's Environmental and Social Commitment Plan.

2.2 Institutional Roles and Responsibilities

2.2.1 Regional Level

Implementation of the regional component will be led by a Project Implementation Unit (PIU) established and maintained in the OECS Commission. The PIU will have composition, staff in numbers and with qualifications, resources, terms of reference, and functions acceptable to the Association, as further set forth in the Project Operations Manual (POM). The PIU will be vested with day-to-day coordination and implementation responsibilities with regard to the regional component of the Project, including: (i) ensuring that the requirements, criteria, policies, procedures, and organizational arrangements set forth in the POM are applied in carrying out the Project; (ii) adhering to procurement and financial management procedures; (iii) ensuring compliance with social and environmental safeguards; (v) conducting monitoring and evaluation; and (vi) preparing all Project reports (including interim financial reports) for the Project. The existing capacity in place at the OECS Commission Environmental Sustainability Unit, and Human and Social Unit, will be responsible for supporting the PIU ESF compliance, throughout project implementation. The regional PIU will contract or appoint one Environmental and Social Specialist to be maintained throughout the implementation of the Project. Similarly, each of the country PIUs will also contract or appoint one Environmental and Social Specialist also to be maintained throughout Project implementation. These E&S specialists will be in charge of implementing, monitoring and reporting this ESMF and all the other E&S instruments applicable to the Project. The specifics of their roles and responsibilities will be further detailed in the POM and in Chapter 9 of this ESMF.

A Project Steering Committee (PSC) will be established and maintained throughout project implementation with composition, resources, terms of reference and functions acceptable to the Association. The PSC will be responsible for: (i) project oversight; (ii) multisectoral and cross-agency coordination; and (iii) policy guidance. The PSC will ensure coordination and oversee implementation performance of the regional statistical activities. The PSC will comprise senior officers from the OECSC and representatives from the participating Eastern Caribbean countries (Grenada, St. Lucia, St. Vincent and the Grenadines). The details for the PCS will be further set forth in the POM.

2.2.2 Grenada

The lead government agency for the Grenada portion of the project will be the Ministry of Finance, Economic Development, Physical Development, and Energy. The MoF, as the implementing agency, will build on the experience from implementing a World Bank project.

Project Steering Committee (PSC): A PSC for the Grenada portion of the project will be established to provide oversight and guidance for project implementation and provide overall policy direction. The PSC will be chaired by the Permanent Secretary of Finance, Economic Development, Physical Development

and Energy, The PSC will be responsible for coordination among government agencies during the implementation of the Project. The committee will meet on a quarterly basis, with additional meetings as required. With respect to the overall regional project, the Grenada PSC chair will participate in the Regional PSC.

Project Implementation Unit (PIU): A dedicated PIU will be established in the MoF to perform the day-to-day implementation activities of the Project, including FM, procurement, E&S aspects, citizen engagement, and M&E. The PIU will be staffed with a mixture of MoF civil servants and external specialists to be engaged by the Project, as needed. Fiduciary responsibilities, E&S aspects , and monitoring and evaluation will be ensured by the government's existing project coordination structure comprising 3 entities: (i) Accountant General's Department in the Ministry of Finance, where an Accountant will work under the supervision of the Accountant General who is responsible for all FM matters, (ii) Central Procurement Unit in the Ministry of Finance, where an assigned Procurement Officer will be responsible for all procurement matters, and (iii) Implementation office in the Ministry of Infrastructure Development, Public Utilities, Energy, Transport, and Implementation responsible for stakeholder coordination, drafting of the Project Operations Manual, Environment and Social Risk Management, and monitoring and evaluation. The agreed staffing arrangements for this project will comprise the following:

- Project Coordinator will be the NSO Director.
- Deputy Project Coordinator will be hired using project funds.
- Accountant in (i) above will perform financial management responsibilities.
- Procurement Officer in (ii) above will perform procurement.
- To augment the capacity to handle the increased workload, the project will hire a Procurement Assistant and Environmental and Social Specialist. The Environmental and Social Specialist will be contracted or appointed no later than 30 days after the Financing Agreement's Effective Date. There will be one E&S Specialist for each of the participant countries and OESCS organization.

2.2.3 Saint Lucia

The lead implementing agency for St. Lucia portion of the project will be the St. Lucia NSO in the Ministry for Finance, Economic Development and the Youth Economy. The MoF, as the implementing agency, will build on the experience from implementing a World Bank project.

Project Steering Committee (PSC): A PSC for the St. Lucia portion of the project will be established to provide oversight and guidance for project implementation and provide overall policy direction. The PSC will be chaired by the Permanent Secretary of MoF and comprise key stakeholders of the NSS in St. Lucia, and NSO Director. The PSC will be responsible for coordination among government agencies during the implementation of the Project. The committee will meet on a quarterly basis, with additional meetings as required. With respect to the overall regional project, the St. Lucia PSC chair will participate in the Regional PSC.

Project Implementation Unit (PIU): A dedicated PIU will be established in the MoF to perform the day-to-day implementation activities of the Project, including FM, procurement, E&S safeguards, citizen engagement, and M&E. The PIU will be staffed with a mixture of MoF civil servants and external specialists to be engaged by the Project, as needed. The agreed staffing arrangements for this project will comprise the following:

- Project Coordinator will be the NSO Director.

- Deputy Project Coordinator will be hired using project funds.
- Staff from the St. Lucia Disaster Vulnerability Reduction Project - Project Coordination Unit, which is in the same Department of Economic Development, will to support the PIU in performing the fiduciary functions (FM and procurement) and to ensure compliance with ESF.
- Project Assistant will be responsible for M&E and will be hired using project funds

In total, for all three participant countries plus the OECS, there will be 4 specialists (one per country) responsible for supporting the management of the E&S risks and impacts.

2.2.4 Saint Vincent and the Grenadines

The lead government agency for the SVG portion of this project will be the Public Sector Investment Programme Management Unit (PSIPMU) within the Ministry of Finance, Economic Planning, and Information Technology. The MoF, as the implementing agency, will build on the experience from implementing a World Bank project.

Project Steering Committee (PSC): A PSC for the SVG portion of the project will be established to provide oversight and guidance for project implementation and provide overall policy direction. The PSC will be chaired by the Director of Economic Planning of the MoF and comprise key stakeholders of the NSS in SVG. The PSC will be responsible for coordination among government agencies during the implementation of the Project. The committee will meet on a [quarterly] basis, with additional meetings as required. With respect to the overall regional project, the SVG PSC chair will participate in the Regional PSC.

Project Implementation Unit (PIU): A dedicated PIU will be established within the PSIPMU, in the Economic Planning Division of the MoF, to perform the day-to-day implementation activities including FM, procurement, E&S safeguards, citizen engagement, and M&E. The PSIPMU will be staffed with a mixture of MoF civil servants and external specialists to be engaged by the Project, as needed. The agreed staffing arrangements for this project will comprise the following:

- Project Coordinator dedicated to this project will be hired using project funds.
- Technical Coordinator will be the Chief Statistician of the Statistical Office in the Economic Planning Division of the MoF.
- FM responsibilities will be performed by the Financial Specialist in the PSIPMU. A FM Assistant will be hired using project funds, and work under the supervision of the Financial Specialist.
- Procurement Officer will be hired using project funds, and work under the supervision of the Procurement Specialist in PSIPMU.
- Existing Environmental Specialist and Social Specialist in the PSIPMU will fulfill all ESF requirements for this project.
- M&E Assistant will be hired as needs be using project funds, and work under the supervision of the PSIPMU Senior Project Officer.

3 Legal and Regulatory Framework

Each implementing entity will have oversight over the project and is bound to implement said project in line with both national legislation and the World Bank's Environmental and Social Framework (ESF). The relevant legal and regulatory frameworks are discussed in the following sections.

3.1 National Legislation

The existing national legislation on environmental and social issues covered under the ESF for each participating country are presented below. It must be noted that the OECS Commission is governed by Saint Lucia's legislation due to its location in that country. In case of discrepancy between the national legislation requirements listed below and the requirements set forth in the applicable World Bank ESSs, the latter prevail instead of national laws and shall apply directly to the Project.

3.1.1 Grenada

Environmental Management Act (2005)

The Grenada Environmental Management Act (2005) provides for the conservation and sustainable management of the country's environmental and cultural resources. The act includes provisions for integrated environmental management, pollution control and environmental monitoring, amongst others. It ensures that any development activities with the potential to have adverse effects on the environment be assessed prior to their commencement and that these potential effects be considered when determining whether said activities should be authorized or not. This Act may be relevant to the installation of electronics and the retrofitting activities anticipated as part of the project.

Waste Management Act (2001)

The Grenada Waste Management Act (2001) provides for the management of waste in conformity with the best environmental practices and related manners. This act is the basis for well-regulated and efficient integrated waste management. Out of this act came the National Waste Management Strategy for Grenada which provides for the implementation of the Waste Management Act. The Act may be relevant to the installation of electronics and retrofitting activities which may produce some amounts of both hazardous and non-hazardous waste.

Solid Waste Management Authority Act (1995)

The Grenada Solid Waste Management Authority Act (1995) established the Grenada Solid Waste Management Authority (GSWMA) which is the body that is charged with developing solid waste management facilities in addition to improving the coverage and effectiveness of solid waste storage, collection and disposal facilities. This Act may be relevant to the installation of electronics and retrofitting activities which may produce some amounts of both hazardous and non-hazardous waste.

Public Health Act (1925)

The Grenada Public Health Act (1925) governs all matters related to public health in Grenada. In 2020 it was amended to include the provisions to protect the population against the spread of Covid-19. This Act is relevant to all aspects of project implementation as it governs reducing Covid-19 transmission.

Land Development Control Act (1968)

The Land Development Control Act makes provisions for the orderly and progressive development of land and to preserve and improve the amenities thereof; for the grant of permission to develop land and for other powers of control over the use of land. Notwithstanding the provisions of any other law to the contrary, no person shall commence to carry carryout development of any land in Grenada without the prior written permission of the Authority. An application to the Authority for permission to develop land shall be in triplicate in the form set out in the Second Schedule to this Act and shall be accompanied by such maps and plans as may be necessary or as may be required by the Authority. This Act may be relevant to the retrofitting activities under the project.

3.1.2 Saint Lucia

Waste Management Act (2004)

The Saint Lucia Waste Management Act (2004) provides for the management of waste. It establishes the Saint Lucia Solid Waste Management Authority (SWMA), provides for waste management planning, licensing of facilities including waste haulers, regulation of operations, and for powers of authorized officers. In 2008 the Waste Management (Biomedical Waste, Transportation, Treatment and Disposal) Regulations were established. This Act may be relevant to the installation of electronics and retrofitting activities which may produce some amounts of both hazardous and non-hazardous waste.

Physical Planning and Development Act (2005)

The Physical Planning and Development Act (2005) makes provisions for the development of land, the assessment of the environmental impacts of development, the grant of permission to develop land and for any other powers to regulate the use of land and for related matters. The act ensures that appropriate and sustainable use is made of all publicly and privately owned land to maintain and improve the physical environment, provide for the orderly sub-division of land and the provision of infrastructure and services, maintain and improve building construction standards to secure human health and safety, and protect the natural and cultural heritage of Saint Lucia. This Act may be relevant to the installation of electronics and retrofitting activities under the project.

Saint Lucia Covid-19 (Prevention and Control) Bill

The Saint Lucia Covid-19 (Prevention and Control) Bill regulates the containment and spread of Covid-19 within Saint Lucia in order to protect public safety, public health and public order. The bill is divided into

seven parts with part two providing the specific Covid-19 prevention protocols. This Bill will be relevant to all aspects of the project and it governs the prevention of Covid-19 transmission.

3.1.3 Saint Vincent and the Grenadines

The Census and Statistics Act (1983)

The Census and Statistics Act 1983 governs the Saint Vincent and the Grenadines' Statistical Office. The Chief Statistician must collect and publish statistics in a manner authorized by the Minister.

The Freedom of Information Act, 2003

The Freedom of information Act, 2003 give rights of access to official documents of the government and public authorities to members of the public and to provide for connected matters. The act also extend the right of members of the public to access information in the possession of public authorities by creating a general right for access to information in documentary form in the possession of public authorities limited only by exceptions and exemptions necessary for the protection of essential public interests and the private and business affairs of persons it respect of whom information is collected and held by public authorities;

The Cybercrime Act, 2016

An act to provide for the creation of offences related to cybercrimes and for related matters

Waste Management Act (2000)

The Waste Management Act (2000) provides the rules for the public management and disposal of solid waste, including hazardous waste. The act also provides for the appointment, functions etc. of the National Solid Waste Management Authority. The act may be relevant to the installation of electronics and the retrofitting activities under the project which will include the disposal of hazardous and non-hazardous waste.

Environmental Health Services Act (1991)

The Environmental Health Services Act (1991) provides for the regulation of activities that may affect public health and the environment. It assigns the Minister of Health responsibility for protecting and promoting public health by providing for and ensuring conservation and maintenance of the environment. It also establishes the Environmental Health Department within the Public Health Department. This Act requires a certificate of approval to be obtained from the Environmental Health Division for the construction, alteration, restoration or replacement of any equipment, apparatus or mechanism which may emit or discharge a pollutant into any part of the environment; or to carryon or alter a process or rate of production with the result that a contaminant or pollutant may be emitted. This Act may be relevant to the installation of electronics and retrofitting activities under the project.

Town and Country Planning Act (1976)

The Town and Country Planning Act (1976) enables the orderly and progressive development of land and the proper planning of town and country areas, to make provision for the control of development. No person shall carry out, or cause to carried out any development in St. Vincent and the Grenadines except under, and in accordance with the conditions of a 'grant of permission for development' given in writing by the Physical Planning Board. The Act outlines the process for applying for such permission. This Act may be relevant to the installation of electronics and retrofitting activities under the project.

3.2 World Bank Environmental and Social Framework

The World Bank Environmental and Social Framework (ESF) protects people and the environment from potential adverse impacts that could arise from Bank-financed projects and promotes sustainable development. This framework provides broad coverage, including important advances on transparency, non-discrimination, social inclusion, public participation and accountability. The ESF also places more emphasis on building Borrower governments' own capacity to deal with environmental and social issues. The ESF consists of:

- The World Bank's Vision for Sustainable Development.
- The World Bank's Environmental and Social Policy for Investment Project Financing, which sets out the requirements that apply to the Bank.
- Ten Environmental and Social Standards (ESSs), which set out the requirements that apply to Borrowers.
- Bank Directive: Environmental and Social Directive for Investment Project Financing.
- Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups.

The ten (10) Environmental and Social Standards (ESSs) establish the standards that the PIU and the project will meet through the project life cycle. A summary of the key objectives of these ESSs and their relevance to the OECS Data for Decision Making Project (P174986) are provided in Table 3.1. The relevant ESSs requirements and objectives apply directly to the Project, throughout the Project life cycle.

Table 3.1: Project Relevant ESSs and their justification

Environmental and Social Standard	Relevance	Justification
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Relevant	The proposed project will have significant positive benefits on statistical data collection and analysis and its input into decision making, there are still some environmental and social risks and impacts associated with the project. These will result from the installation of electronics and retrofitting activities along with the potential exclusion of some groups from the improved data collection processes. Mitigation measures will be

Environmental and Social Standard	Relevance	Justification
		implemented following the mitigation hierarchy, as appropriate, to reduce these risks.
ESS2: Labour and Working Conditions	Relevant	The project will involve the engagement of direct, contracted and primary supply workers. Occupational Health and Safety considerations will be considered throughout the project life cycle, which also includes COVID-19 transmission prevention measures to be adopted and implemented by project workers and contractors has been considered. Labor Management Procedures (LMP) with the Grievance Redress Mechanism (GM) for project workers has been prepared and will be operationalized throughout project implementation.
ESS3: Resource Efficiency and Pollution Prevention and Management	Relevant	The installation of electronics and retrofitting activities may produce both hazardous e.g., asbestos and non-hazardous waste. This includes e-waste. Additionally, the project will ensure that any equipment procured is as energy efficient as is able to be afforded.
ESS4: Community Health and Safety	Relevant	Although the small works activities related to electronics installation and retrofitting will take place in existing government office buildings, staff and other users within these buildings may experience minor inconveniences and disturbances. The project will also ensure that the public does not enter the areas where those activities are ongoing.
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Not currently relevant	N/As
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Not currently relevant	N/A
ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not currently relevant	N/A

Environmental and Social Standard	Relevance	Justification
ESS8: Cultural Heritage	Not currently relevant	N/A
ESS9: Financial Intermediaries	Not relevant	N/A
ESS10: Stakeholder Engagement and Information Disclosure	Relevant	The OECS and the governments of Grenada, Saint Lucia and Saint Vincent and the Grenadines have prepared a Stakeholder Engagement Plan (SEP) with its GM for project stakeholders. This and the other project documents will be disclosed and consulted upon throughout the project life cycle.

3.3 Environmental and Social Management Capacities

Preliminary findings of the overview of the capacity assessment indicate that the governance structure is weak to implement the related E&S tasks of the Project in line with the World Bank ESSs since there is fragmentation of responsibilities with regard to statistics which could lead to confusion or inefficiency, lack of clarity in terms of the responsibilities to carry out the tasks, as well as weak communication and coordination mechanisms among the institutions involved.

Capacity building will be important for the implementation and monitoring of the ESF-related instruments and national policies and regulations described above which will be required at different levels of the institutional set-up for the project. The recommendations are to: train PIU staff, key stakeholders and project contractors and/or workers on the application of the ESF (as required by the specifics of the Project's activities to be financed under in each participant country); provide continued technical support in implementation of sub-activities to ensure the application of the ESSs, implementation and monitoring; and, network and frequent knowledge exchange.

The OECS, Grenada, Saint Lucia and Saint Vincent and the Grenadines will establish the regional and national Project Implementation Units (PIUs). Implementation and monitoring of the Environmental and Social Management Framework (ESMF) and related instruments for regional level project activities, including training, will be the responsibility of the OECS. At a national level, the line ministry responsible for statistics will be responsible for the implementation and monitoring of the ESMF and all other Environmental and Social Standards (ESS) instruments, including training. For this, both the regional and national level project implementation units, will engage an Environmental Safeguards Specialist and Social Safeguards Specialist who will support this function, which will be reviewed and adapted once the project implementation begins or within three (3) months of the Effective Date of the Project. Safeguards staff (Environmental Safeguards Specialist and Social Safeguards Specialist) from the national PIUs (supported by their counterpart from the regional PIU and entities hired by the PIUs) will provide safeguards related capacity building for local government ministries and contractors.

The capacity building in environmental and social safeguards will cover the following:

- **Project Safeguards Staffing**: The regional and national PIUs will have at least 1 staff (one Environmental and Social Safeguards Specialist). The tasks will include (i) participation in meetings that will be held at different stages throughout project effectiveness (ii) participation in the monitoring of ESMF compliance, and (iii) being the local focal point for the grievance redress mechanism (GM) and responsible for data entry into the GM database on complaints and complaints resolution
- **Familiarization Meetings and Training: Based on this ESMF, two types of training programs on safeguards (environmental and social) will need to be developed:**
    - Familiarization meetings to all staff at the regional and national PIUs on the project's approach to management of environmental and social issues, the ESMP, and the GM.
    - A training course for the contractors, builders and construction workers, which covers the same topics as the overall introduction, but with much more detail to make the participants fully conversant with the approach to management of environmental and social issues through the ESMP.

4 Environmental and Social Baseline

4.1 Physical Environment

4.1.1 Grenada

Grenada, which is also called the Isle of Spice or the Spice island is located in the south-eastern Caribbean Sea approximately 160km north of the coast of Venezuela. Grenada includes the southern Grenadine islands of Carriacou and Petit Martinique. Grenada's capital, St. George's is located on the south-western side of the island. It is also the country's main port being located on a natural harbour.

Grenada is volcanic in origin, with a ridge of mountains running north and south—the steeper slopes to the west and a more gradual incline to the east and southeast. The highest point is Mount St. Catherine (2,757 feet [840 metres]) in the northern part of the interior. The landscape is scenic, with fairly deep steep-sided valleys and about 10,000 acres (4,000 hectares) of forest.

Figure 4.1- Map of Grenada

4.1.2 Saint Lucia

Saint Lucia is the largest island in the Windward Island grouping of the Eastern Caribbean. It is located 34km to the northeast of Saint Vincent and the Grenadines and 39km to the south of Martinique. Its capital and major port is Castries which is located on the north-western coast of the island. Saint Lucia's second major centre is Vieux Fort, which is located in the south.

The island is of volcanic origin and is bisected from north to south by a central ridge of wooded mountains, the highest point being Mount Gimie (3,145 feet [959 metres]). Many streams flow from

the mountains through fertile valleys. In the southwest are the Gros and Petit Pitons (2,619 feet [798 metres] and 2,460 feet [750 metres], respectively), two immense pyramids of rock rising sharply from the sea and enclosing a small bay. Near Petit Piton, in the crater of an ancient volcano, are the boiling sulphur springs from which the nearby town of Soufrière takes its name. A choice tourist site, the springs also contain substantial energy potential.

Figure 4.2- Map of Saint Lucia

4.1.3 Saint Vincent and the Grenadines

Saint Vincent and the Grenadines (SVG) consists of 32 islands and cays which include the island of Saint Vincent and the northern Grenadine islands[1]. SVG is located 160 km to the west of Barbados and is between Saint Lucia in the north and Grenada in the south. It's capital city Kingstown is located on the southern coast of the island of Saint Vincent.

[1] Some of these include Bequia, Canouan, Mayreau, Mustique, Prune Island, Petit St. Vincent Island, Union Island and the Tobago Cays which are a wildlife reserve.

The island of Saint Vincent has thickly wooded volcanic mountains running north-south and many short swift streams. Though numerous, the streams are small except after heavy rains. There are no navigable rivers. The island's two highest peaks are both on the volcano La Soufrière (4,048 feet [1,234 metres] and 3,864 feet [1,178 metres]), in the north, which erupted disastrously in 1812 and 1902, seriously affecting the country's agriculture and temporarily displacing residents of communities around the foothills of the volcano. The 1902 eruption coincided with that of Mount Pelée on Martinique. Soufrière became active again in 1979, repeating the cycle of agricultural damage and massive evacuation. The volcanic ash, which spread as far as Barbados, is said to have enhanced the fertility of the soil. La Soufrière currented 9th April, 2021, resulted in displacement over 4000 families, damage to the road network and interruption to the water supply in the island. Other noteworthy peaks on the island include Grand Bonhomme and Mount St. Andrew.

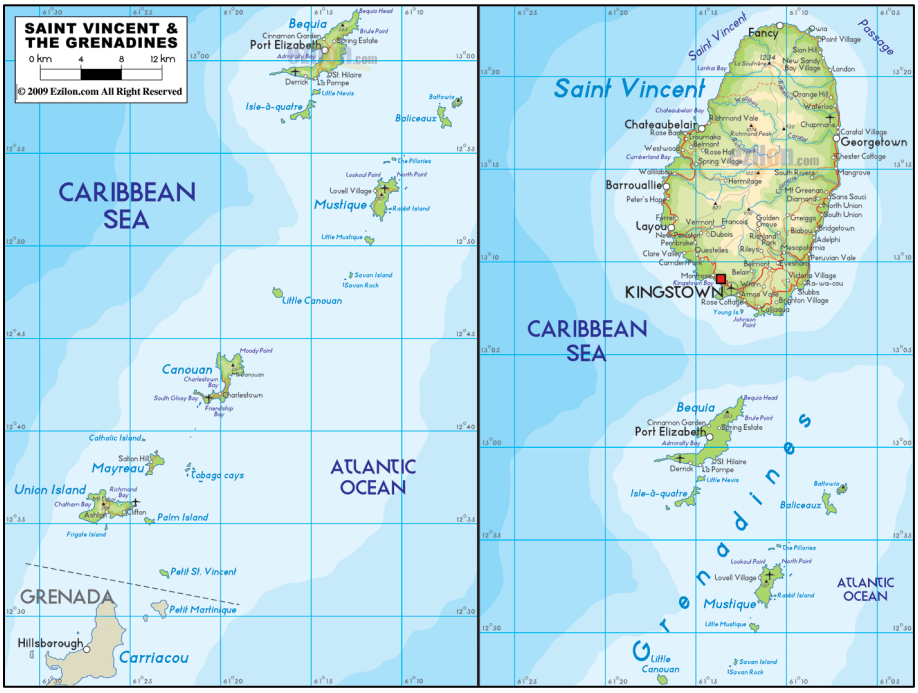

Figure 4.3- Map of Saint Vincent and the Grenadines

4.2 Biological Resources

4.2.1 Grenada

Data indicated that in 2015, nearly 50% of Grenada's total area was covered in forests. Grenada's forest cover has remained relatively stable from 2004 to 2015 mainly due to the policies put in place by the Grenadian government. The Grenadian forests are used for a variety of purposes such as the production of timber and providing habitat for the country's wildlife. The Grenadian forests are also crucial to the country's economy because they attract significant numbers of tourists each year.

4.2.2 Saint Lucia

Although the island has a relatively small landmass, it possesses a high degree of biodiversity and species endemism and productive coastal and nearshore habitats, earning it international recognition as a biodiversity hotspot. The island and its waters support a number of globally and regionally important habitats and species, including 17 major vegetation types (e.g., dry forest, mangroves, rainforest), the Pitons Management Area-a UNESC) World Heritage site, the Ma Koté Mangrove and Savannes Bay-both Ramsar sites, and over 200 endemic species (e.g., the pygmy gecko, the Saint Lucia racer snake, and the Saint Lucia parrot). Saint Lucia's marine habitats and biodiversity provide ecosystem services that buffer the impacts of storms and climate change, provide residents with valuable natural resources and opportunities for sustainable livelihoods, and support economically important agriculture and tourism industries.

4.2.3 Saint Vincent and the Grenadines

Saint Vincent and the Grenadines boasts a diverse collection of biological resources. The main island St. Vincent is rugged and mountainous with steep slopes and fertile earth, volcanic ash and alluvial soils. The country has about 12,700 ha of tropical forests, including primary and secondary rainforest, palm brakes, elfin woodland, littoral woodland, dry scrub woodlands and mangrove forest. The significant tropical forests provide natural habitat for wildlife including the St. Vincent Parrot and other endemic species. The Grenadines, by contrast, consists of low dry islands surrounded by extensive coral reefs and sea grass beds.

4.3 Physical Cultural Resources, Human Settlements and Land Use

4.3.1 Grenada

According to the country's 2011 census, Grenada's population is 106,667. When disaggregated by gender, there were slightly more males than females on the island – 53,898 and 52,769 respectively. The age group with the largest number of people is the 20-24 grouping which represented 9.29 % of the entire population and is closely followed by the 15-19 age range with 9.27 %. The Census also confirmed a well acknowledged belief held by many with regards to the youthfulness of the population. Sixty three percent (63 %) of the population are below 40 years old. Additionally, the highest concentration of the population is concentrated in the St. George's area (35.9 %). That is not at all surprising given the fact that it is the parish where the capital is located and quite understandably, is the main commercial and industrial centre. The parish with the second highest concentration of the population St. Andrews with 24.8 %. Essentially, over 60 % of the entire population reside in St. Georges and St. Andrews. The St. Andrews parish is considered as the main breadbasket of the island, having the highest agricultural production output.

4.3.2 Saint Lucia

Saint Lucia's population is 183,627. Despite being one of the smallest countries in the world (617 square kilometers or 238 square miles) and ranking 191st, St Lucia has a fairly high population density of 298 people per square kilometer, which ranks 41st. The capital and largest city is Castries, with a 2014

population of 70,000, or more than one-third of the total population. Castries is also a major tourist destination and a cruise ship port.

Despite the concentration of population in Castries, Saint Lucia's population is actually fairly evenly split between rural and urban areas. In terms of ethnicity, the population is mostly African or of mixed African-European descent, with a small population of Indo-Caribbeans (3%). Afro-Caribbeans account for 68% of the population, followed by mixed (17%) and European (5%).

4.3.3 Saint Vincent and the Grenadines

The last population census which was undertaken in 2012 indicated that St Vincent and the Grenadines has a population of 109,991, with a ratio of 1.05 males for every female. The country is densely populated with 307 people per square kilometre (792/sq mi), which ranks 39th in the world. The capital and largest city is Kingstown, with a population estimated at 35,000. The 2021 volcanic eruption may have some implications for population, in terms of size, density and location.

4.4 Socio-Economic Background

4.4.1 Grenada

Grenada's economy over the years has been transformed into a predominantly service sector economy with the Tourism sector being the main contributor to Gross Domestic product (GDP). In recent times the Government has been placing enormous emphasis on the development of that sector by promoting the development of high-end quality resorts, investing more in promotional activities and seeking to enhance the country as pure and pristine. Grenada has a lot of attractions to offer, very favourable weather conditions, excellent beaches, lakes, waterfalls, very friendly and hospitable people, low crime rate, good infrastructure, exceedingly clean and pristine environment, fairly close proximity to the USA market etc. have placed Grenada in a very advantageous position to capitalize on the tourism market. In 2019 the country's GDP was USD $1.211 billion while its GNI per capita was USD$9,840 ranking it in the World Bank's upper middle income category.

4.4.2 Saint Lucia

Like the majority of the region, Saint Lucia's economy depends primarily on tourism (65% of GDP), banana production, and light manufacturing. The per capita GDP increased slightly, from USD$ 6626 in 2010 to USD$ 6848 in 2014. In 2019 the country's GDP was USD$ 2.122 billion and the GNI per capita was USD$ 11,020 ranking it in the World Bank's upper middle income category. According to an International Monetary Fund report, Saint Lucia's economic activity has recovered, and the country's fiscal situation became stronger in 2014, mainly due to strong tourism inflows and lower oil prices. After the 2012 recession and close-to-zero growth in 2013, in 2014 the economy was again showing signs of recovery, with GDP growth reaching 0.5%, mainly driven by the transportation and hotel industries, although the construction, communication, and agriculture sectors remained in decline.

4.4.3 Saint Vincent and the Grenadines

Saint Vincent and the Grenadines is considered an upper middle-income country by World Bank ratings. In 2019, the country had a GDP of USD$ 824 million and a GNI per capita of USD $7460. The economy depends on agriculture, tourism, construction, remittances, and a small offshore banking sector. However, agriculture still remains the most dominant industry in the country. This includes the production and export of bananas, arrowroot and ground provisions. Many fundamentals for greater economic freedom, such as flexible regulations, an efficient legal system that secures private property, and macroeconomic stability, are in place. Greater access to private financing and more openness to trade and international investment would improve the business climate. The economy was negatively affected by U.S. economic sanctions imposed on Venezuela in 2018. It is uncertain what impact the current volcanic eruption will have on the economy of Saint Vincent and the Grenadines.

5 Environment and Social Procedures

This section describes the E&S screening and risk classification process to guide environmental and social risk management approach to be applied to all project activities. In specific, this ESMF will focus in the process for screening and, where needed, managing E&S risks associated with Project-financed the equipment installation and retrofitting activities that will be a part of Component 1 of the Project. The potential environmental and social risks and impacts of the different types of sub-project activities are considered. Guidance for screening the activities against a checklist is provided. This E&S screening will determine the environmental and social risks along with the type of E&S mitigation measures to be implemented.

5.1 Potential Environmental and Social Risks from the Project

The overall environmental and social risk rating of the project is moderate under the World Bank's ESF.

The environmental risk rating is low. The Potential risks are associated with (i) minor retrofitting activities (re-wiring, drilling holes in walls, moving furniture, and others) that may be needed for the installation of electronic equipment; (ii) management and disposal of non-hazardous and hazardous waste, including electronic waste (e-waste) in case of the replacement of old electronics; and, (iii) occupational health and safety hazards for the workforce. Possible negative impacts are expected to be minor, site-specific, temporary, and fully reversible. Given the current global situation caused by the COVID-19 pandemic, the project will also include measures for transmission prevention.

The social risk rating is moderate. The minor civil works that will occur as a result of installation of equipment and retrofitting will take place inside existing government offices and therefore will not result in any land acquisition, restriction of access or involuntary resettlement. As it regards indigenous peoples, St. Vincent and the Grenadines noted the presence of Garifuna descendants in its territory, however, they do not meet the ESS7 cumulative criteria for indigenous peoples, hence they are classified as a vulnerable/disadvantaged group of stakeholders. Additionally, there are no Indigenous Peoples meeting ESS7 cumulative criteria present in the territories of the other participating countries in this Project. However, the project will be implemented in a context where there are varying degrees of social exclusion, per ESS1. Invisibility of vulnerable groups[2] is usually a problem and the processes of community consultation and grassroots participation seem to be weak in all participant countries. In addition, the capacity for the management of the World Bank's Environmental and Social Framework is observed to be low. In a statistical capacity-building project that focuses on data production and dissemination, consideration should be given to the vulnerable groups especially in the format for information collection and dissemination Environmental and Social Impacts Identification and Assessment

[2] Vulnerable group are defined as those who, by virtue of, for example, their age, gender, race, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, Economic disadvantage s or indigenous groups.

The identification and assessment of environmental and social risks and impacts are considered key as these will be the foundation for the proposal of the E&S mitigation and remediation measures necessary to anticipate, minimize, reduce and/or compensate for the negative effects that the project may cause to the environment and the society. This chapter presents the main environmental and social risks and potential impacts identified considering the characteristics and conditions of the physical environment and socioeconomic area of the Project.

5.1.1 Positive Impacts

The project is expected to have several positive impacts which will only be mentioned in this document as the purpose of the document is to mitigate against the potential negative impacts. Positive impacts of the project include, but are not limited to, increased efficiency in the publishing of statistical research, greater rate of inclusion of usually excluded groups increased capacity of national statistical offices and the OECS to produce statistical data and increased energy efficiency through the installation of more energy efficient equipment.

5.1.2 Negative Impacts

The potential negative impacts discussed here are mostly of an environmental and occupational health and safety nature as a result of the minor civil works activities that will be associated with the retrofitting and installation of equipment as a part of Component 1. These civil works will take place within the existing footprints of buildings and therefore the negative impacts will be minor, site-specific, temporary and fully reversible.

1. **Increased Noise, Dust and Vibration Levels**
   Increased noise, dust and some small vibrations could result from drilling holes in the wall and the movement of furniture and equipment. These will likely be a nuisance to contractor workers as well as users (staff and members of the general public) of the office space in which the activities are happening and disrupt their working activities.

2. **Occupational Health and Safety**
   The safety of workers is critical to any operation. The mishandling of equipment, improper storage of tools and materials, exposed live wires, inadequate PPE, equipment power cords in walkways etc. could potentially cause serious injuries, including, but not limited to, electric shock, trips and falls, falls from heights and inhalation of hazardous materials to both project workers and other users (staff and members of the general public) of the office space in which retrofitting and equipment installation activities are taking place. There is also the risk of outbreaks of Covid-19 associated with these works if proper Covid-19 transmission prevention protocols are not established and followed.

3. **Unfair Treatment or Discrimination of Project Workers**
   Project workers could be subjected to unfair treatment or discrimination on the basis of personal characteristics unrelated to job requirements, such as race, gender, religion and sexual

orientation. These risks apply to all Project Workers, as defined under ESS2, including contracted workers on sub-projects, as well as consultants employed and engaged by the PIU for the project.

4. **Social Friction between Contractor's Workers and Users of Buildings in which Retrofitting and Equipment Upgrade Works shall be Undertaken**

   Since the works will take place in government buildings while the offices are still being utilized by staff and other users, there is the risk that some social tension may develop between the contractor's workers and the users.

5. **Poor Waste Management**

   The retrofitting and installation of equipment will create waste, including hazardous waste (e.g., e-waste, asbestos and others during the retrofitting work), which if not adequately managed and disposed could result in soil and water pollution, as well as represent a health hazard.

6. **Hazardous Materials**

   There is the potential for the discovery of hazardous material during retrofitting activities, especially if these activities are being carried out in older buildings. This could include asbestos or mold. There is also the risk of being exposed to pesticides if, while during retrofitting, it is discovered that there is the need for termite treatments or exterminations for other types of pests. Improper handling and disposal of these materials could lead to negative impacts on the health of both workers (contractor workers and office staff) as well as any members of the public that may utilize the space. Improper disposal also can result in soil and water pollution, and health and safety negative impacts.

6 Environmental and Social Mitigation Measures

The environmental and social risks and impacts of the project are mainly related to the small civil works associated with the retrofitting and equipment installation activities that will be carried out under Component 1 of the project. This section seeks to suggest mitigation measures that will address the negative impacts of sub-project activities in an attempt to reduce or avoid them. The link between the predicted environmental impacts, the mitigation measures identified during the screening and assessment process, the budgeting to implement said measures and the roles responsibilities to ensure that the measures are implemented will be summarized in the site-specific Environmental and Social Management Plans (ESMPs).

6.1 Mitigation measures

The previous chapter outlined the potential negative impacts and risks that could be typically associated with the activities under Component 1. This section recommends specific actions that should be implemented in order to reduce, avoid, mitigate and/or compensate for the negative environmental and social risks and impacts identified during the assessment of the sub-project activities.

Most of the impacts are related to labour and solid waste management, including e-waste management. Once the detailed project activities/designs have been finalized, additional assessment will need to be completed to determine the appropriate site-specific mitigation measures that should be implemented. The screening process that will be used to identify the type and extent of the sub-project risks and impacts is detailed in Chapter 7 and Annex 5-Screening Procedures and Associated Forms of this ESMF.

Additional mitigation measures can also be derived from conditions imposed by any statutory agency which reviewed the sub-projects and provided recommendations or conditionalities. These should be converted to contract clauses.

6.2 General Considerations

While this section of the ESMF relates to the identification of appropriate mitigation measures, proper sub-project implementation and management is always important. Additionally, consultations must be conducted so that stakeholders, particularly persons who may be affected by the activities are adequately informed about the potential risks, impacts and mitigation measures and may provide their feedback. Any concerns or suggestions expressed by the stakeholders should also be considered in the design of the activity. Although most of the negative impacts will be minor or low, the mitigation measures outlined in Table 6.1 are necessary.

6.3 Specific Considerations- Depreciation of the Natural Environment

A general issue for the activities of Component 1 of the project is the generation of solid waste and/or any leftover materials from the retrofitting and equipment upgrade. All such materials and any other substances such as oil, grease, toxic materials will not be disposed of in open soils, rivers, streams or in any place from where they can eventually run off into the surface and/or underground water systems.

6.4 Labor and Working Conditions

For the prevention and mitigation of the potential risks and impacts for labor and working conditions Labor Management Procedures (LMP) have been prepared. These procedures meet the requirements of ESS2- Labor and Working Conditions, of the World Bank's ESF and are also compliant with the national laws in each of the implementing countries where such laws provide higher protections than ESS2 (including on minimum age for work). ESS2 is relevant for the project given that the project will potentially be hiring both direct workers as well as contracted workers to complete the retrofitting works. The LMP contains measures to address the potential risks and impacts that may arise from the interaction between the project workers and the local communities as well as the users of the buildings in which retrofitting works will be conducted.

The LMP also includes considerations for Occupational Health and Safety that are in line with the ESMF, ESS2 and the World Bank Group's EHS Guidelines to ensure that the health and safety conditions of workers during project activities. Some OHS hazards related to project activities include, but are not limited to, electric shock, improper use of PPE and exposure to dust. The specific Occupational Health and Safety Plan (OHSP) to be adopted and implemented for this Project is included as Annex 4 of this ESMF.

The LMP also includes a grievance mechanism for project workers and includes provisions to ensure that the project does not employ child labor and prescribes to the concepts of non-discrimination, transparency in terms and conditions of employment and equal opportunity.

6.5 Environmental and Social Mitigations Specifications

There are always E&S risks and impacts associated with the implementation of projects activities. Most of the negative impacts associated with Component 1 for this project, are expected to occur during the construction/installation phase. While these impacts are not expected to be major, the careful implementation of mitigation measures will allow for the reduction or avoidance of any adverse effects. These general impacts have been identified in Chapter 5 and Table 6.1 below indicates the list of all potential mitigation measures related to these activities. The measures are presented in a manner that makes them easy to be incorporated into country level Environmental and Social Management Plan (ESMP) that will be prepared during implementation, as needed. In turn, these will become contract clauses for the contractor who will undertake the minor civil works. This also allows for ease of monitoring activities throughout the project cycle. Pesticides (e.g., for termite treatments or for extermination) use is also included in the standard ESMP below (note that the use or purchase of significant amounts of pesticides is not eligible under the Project).

Table 6.1-Impacts and general mitigation measures

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
Retrofitting and equipment installation sites	Retrofitting and equipment installation areas are properly delimited with physical safety barriers and signage	(a) Retrofitting and equipment installation areas are marked with signage and safeguarded with safety barriers to keep the project and the workers on the site safe from trespassers, interruptions, and other inconveniences, and prevent passers-by from accidentally entering the site and being hurt by equipment or falling material. These measures are also part of the OHSP.
Soil Erosion and Slippage	Direct disposal of waste on the ground and/or open soil should not be permitted.	(a) Contractors should follow the guidelines outlined in the Waste Management Plan included as Annex 4 of this ESMF, including without limitation disposing of waste in licensed dumpsites.
Air Quality	Air pollution: in order to help mitigate; regular inspections of machinery and equipment used in the operation must be performed, to ensure their good working condition, and dust prone areas and material should be covered.	(a) Materials with the potential to produce dust should be stored away from site boundaries, where reasonably practicable. If not practicable, ensure they are always properly covered when not in use. (b) During pneumatic drilling/wall destruction dust shall be suppressed by installing dust screen enclosures at site. (c) If available, use drills, saws and other equipment that minimize the creation of dust. (d) Wipe surfaces with damp cloth immediately after dust creation activity.

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
Noise (Vibration and noise nuisance)	For these impacts, supervision of working conditions has been included as a routine measure and includes: Daily regular inspection of machinery and equipment used in the operation to ensure that they are in good working condition, thus avoiding excessive vibration and noise. As much as is possible, noise generating sources should be far from any noise sensitive receptors in the buildings in which the retrofitting will be completed e.g., staff and users of buildings, to meet the noise emission levels provided by the local legislation or in its case those as are indicated in World Bank IFC's General EHS Guidelines. Workers in noisy working environment must use of noise suppression PPE, and those noise emitting sources must be shielded and/or have noise suppressors.	(a) Complete activities that are noisy outside of the busiest office hours. (b) Use temporary barriers/enclosures e.g., plywood with sound absorbing materials (c) Staff and other users to be informed in advance of any activities to occur during work hours. (d) Noise suppression equipment or systems supplied by manufacture will be utilized. (e) Ensure all equipment are properly serviced. Contractors must develop and implement a public notification and noise management plan, in line with applicable regulatory and legal standards, which should be consulted with the staff and users of the building in which the small activities will be taking place.
Non-Hazardous waste	Waste Management (general)	(a) Contractors to develop and implement a waste management plan to be part of their contractors ESMPs in consultation with the local solid waste authorities. (b) Contractors to abide by all pertinent waste management and public health laws.

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
		(c) Waste collection and disposal pathways and licensed sites will be identified for all major waste types expected from demolition and construction activities. (d) Construction and demolition wastes will be stored in appropriate bins for appropriate disposal in licensed dumpsites. (e) All waste will be collected and disposed of properly in approved landfills by licensed collectors. The records of waste disposal will be maintained as proof for proper management as designed. (f) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos or other hazardous material that need to be disposed of in licensed hazardous waste dumpsites for adequate disposal).
Hazardous waste	Solid (E-Waste) and Liquid Waste Management for hazardous substances	(a) Contractors must provide temporary storage on site for all hazardous or toxic substances in safe containers labelled with details of composition, properties and handling information. The containers of hazardous substances shall be placed in a leak-proof container to prevent spillage and leaching. The wastes shall be transported by specially licensed carriers and disposed in a licensed facility for hazardous waste.

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
		(b) E-waste generated as part of the project activities of replacement of computers and other digital devices will be removed and properly stored under leak proof conditions until it is transported by specially licensed carriers and disposed in a licensed facility for recycling or are sold for certified refurbishment facilities. (c)Paints with toxic ingredients or solvents or lead-based paints will not be used. (d) Banned chemicals will not be used on the project. If termite treatment is to be utilized, appropriate chemical management measures will be implemented to prevent contamination of surrounding areas and use only licensed and registered pest control professionals with training and knowledge of proper application methods and techniques. (e) Any activity which involves the purchase or use of pesticides, per the ESF and applicable WBG EHS Guidelines, other than incidental amounts (for example termite treatment in item (c) above), will be excluded during the screening project.
Wastewater	Wastewater pollution management	(a) Liquid and chemical wastes will be stored in labelled containers which will be separated and secure places (out of reach of the public).

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
		(b) Construction related liquid wastes must not be allowed to be accumulated on or off the site, or to flow over or from the site in an uncontrolled manner or to cause a nuisance or health risk due to its contents.
Hazardous Materials	Solid and Liquid Waste Management for asbestos	(a) If asbestos is located on the project site, it shall be marked clearly as a hazardous material. If work has already commenced, all work in the area must stop immediately. An asbestos management plan must be prepared by the contractor and approved by the relevant local health and waste management authorities. b) Where possible the asbestos and its location must be appropriately contained and sealed to minimize exposure. The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust. (c) Asbestos will be handled and disposed of by skilled & experienced professionals using appropriate PPE (personal protective equipment) such as respirators and Tyvec suits (disposable coveralls or jumpsuits). (d) If asbestos material is to be stored temporarily, the wastes should be secured within closed containments and marked appropriately. Security measures must be implemented

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
		against unauthorized removal of asbestos from the site. No removed asbestos will be reused.
Chemicals	Oil, grease, toxic substances and waste should not be disposed-off on streams, rivers or places where they can eventually end up in the sea or soils.	(a) The contractor must implement all necessary waste management plans and measures. (b) All construction materials, including chemicals, must be properly stored. (c) Contractor should prepare a site specific ESMP which will include considerations for chemicals and which will be consistent with the guidelines established in the Waste Management Plan included as Annex 4 of the ESMF.
Energy Efficiency	Energy consumption and efficiency Energy efficiency measures will be considered for all project activities	(a) Project activities will promote the use of energy efficiency and feasible and where possible the project will promote consumption of renewable energy. (b)Advanced designs and construction techniques shall be considered. The project will also upgrade buildings and replace equipment with energy-saving devices.
Occupational Health and Safety	Occupational Health and Safety	(a) Contractors must ensure that an Occupational Health and Safety Plan is in place to guide work activities and provide a safe environment for workers. The OHS plan must be

IMPACTS	GENERAL MITIGATION MEASURES	SPECIFIC MITIGATION MEASURES
		consistent with the ESF, the EHS guidelines and aligned to the Occupational Health and Safety Plan (OHSP) established in Annex 3 of this ESMF. (b) Contractors must ensure that all workers have received regular training to perform their job, as well as daily inductions prior to work activities have taken place. (c) Contractors must ensure that all workers operate within a safe environment. All relevant Labour and Occupational Health and Safety regulations must be adhered to ensure worker safety. Workers must be provided with necessary equipment as well as protective gear as per their specific tasks such as hard hats, overalls, gloves, goggles, boots, etc. (d) Sanitary facilities must be provided for all workers on site. Contractors must ensure that there are basic medical facilities on site and that there are staff trained in basic first aid. (e) Appropriate posting of information within the site must be done to inform workers of key rules and regulations to follow, and workers should be provided with ES and OHS training on a regular basis.

7 Environmental and Social Screening Procedures

The environmental and social screening is intended to ensure that proposed country level subprojects projects are subject to the appropriate extent and type of environmental and social assessment (ESA) needed. The first step of the screening procedure will be the preparation/provision of a screening form designed to capture the necessary information about potential environmental and social impacts associated with the proposed activities. The screening form will have to be completed by the Proponent of the country level subproject and submitted to the PIU for review. The country level subproject Screening Procedures have been included in Annex 5.

If, through the use of "Form A. Sub Projects Screening Procedures" the subproject analyzed is found to have no impacts on the environment and social aspects, no further action will be required. However, if impacts are identified, whether they may be mitigated or not, the sub-project screening results are to be brought to the attention of the PIU.

Depending on the results of the completed checklist, the safeguard team of the PIU will guide the subproject level project to either complete a Simple Environmental and Social Assessment (ESA) (Form C) or a Limited Environmental Social Assessment (LEAS) (Form D). Limited Environmental Assessment applies if the sub-project may create minor environmental and social problems that require frequent monitoring or sub-project design modifications to minimize or eliminate the impacts. In accordance with normal procedure, copies of the above will then be submitted to the relevant environmental and social official/authority by the PIU for review also.

7.1 Permitting

If required, the Regional and National PIUS will be required to consult the relevant authority with legislated responsibility for granting planning permits or approvals for project related activities. For all World Bank projects, in addition to applicable World Bank ESSs, all laws and regulations and guidelines pertaining to planning an environmental protection in Grenada, Saint Lucia and Saint Vincent and the Grenadines must be followed and obtained.

The evaluation, screening and scoping of activities and projects by the relevant Planning authority may conclude that certain projects or activities require that an ESIA be conducted. In such cases, then any mitigation requirements or conditions from that ESIA should be included in the relevant contracting language to ensure that they are carried out.

8 Environmental and Social Management Plan

This instrument is prepared as a guideline for the preparation of site-specific Environmental and Social Management Plans (ESMP) for subprojects activities that are still pending for a final design and site assignment. Usually, the ESMF is used to guide the development of specific ESMPs, in view that general activities and impacts for the project concept design have been identified, but that specific details on the activities for the implementation of the subproject are not known. Therefore, a template of a generic ESMP for the project has been included below. The number, scope, and type of plans, procedures, programs, to be included in each ESMP is not limited, and it should be developed according to the project needs. It is also expected that in the case of environmental and social risks or impacts that have not been identified or included in this ESMF, a plan can and should be prepared using the recommended formats.

8.1 Guidelines for the Development of Environmental and Social Management Plans for Subproject Activities

An Environmental and Social Management Plan (ESMP) is a technical assessment document for identifying environmental and social impacts. This instrument predicts those relevant environmental and social impacts that a project and its activities could create during its implementation (construction, operations, and closure). The ESMP includes environmental and social impact mitigation and control measures, as well as its predicted costs, and also the time and length for those measures to be implemented, and the responsible parties for it. It is the responsibility of the E&S Specialists for the project at the PIU and in each of the participating countries to prepare the ESMPs, where needed.

8.1.1 Subproject Identification Procedures

In order to determine the extent and depth of the ESMP for needed for each subproject, an identification procedure will be performed using a specially designed form (included as Annex1 and further detailed in Chapter 9). The identification process for subprojects will also ensure that the activities implemented which could potentially generate negative impacts will not be non-compliant with the Environmental and Social Standards of the World Bank Group (ESS-WBG). The standards are:

- ESS 1: Assessment and Management of Environmental and Social Risks and Impacts;
- ESS2: Labor and Working Conditions;
- ESS3: Resource Efficiency and Pollution Prevention and Management;
- ESS 4: Community Health and Safety;
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities;
- ESS8: Cultural Heritage;
- ESS 9: Financial Intermediaries; and
- ESS 10: Stakeholder Engagement and Information Disclosure

8.1.2 Risks, Strategies and Mitigation Opportunities for Subprojects

The general potential environmental and social risks and impacts for project activities have been identified in a previous section of this ESMF. Project implementation will occur in different countries over varying time periods and will also be implemented by different agencies and contractors with differentiated skillsets. Additionally, currently, the specific activities and their location have not yet been identified and defined. This section of the ESMF identifies and analyses those similar activities for the OECS Data for Decision Making Project that will occur in all locations during project implementation i.e. construction, operation and closure.

In order to ensure good practices and attention to those identified risks and impacts, and in accordance to the recommended mitigation measures, a list of strategies is presented for the country-level ESMP's preparation. These will be included in the Terms of Reference (TORs) of the future contractors to be hired by each country under the project; this will ensure that a specific ESMP for each subproject action will be prepared and fully implemented. Table 10 presents the risks, strategies and mitigation for subproject of this program.

Table 8.1- 1.1.1 Risks, strategies and mitigation opportunities for subprojects

Media	Risk and Impacts	Mitigation opportunities
Environ/ **Natural**	Risks of a reduction of air quality (increased particulate matters and gas emissions, radiation, etc.)	Include adequate insolation and other procedures to ensure emission controls from sources point
	Labor and working accidents	An Occupational Health and Safety plan would be prepared specifically for all project implementation locations
	Lack of warnings signs	A sign protocol will be prepared for all project implementation location. This protocol will include prevent and danger notifications to ensure secure access to individuals
	Dust and Noise generation	Daily cleaning of work areas. Use of face masks and filters for workers in dusty areas For noise control, adjust working schedule to those hours where there will be minimal activity in the buildings. Workers in noise work areas, must use muffled earwear to reduce potential health issues

Media	Risk and Impacts	Mitigation opportunities
	Solid waste without treatment	For this purpose, a solid waste management plan will be prepared in accordance with the guidelines established in Annex 4 of the ESMF. This must include waste separation/classification and separation. Organic wastes must be maintained under refrigeration during temporal storage, before final disposition by authorized operators (in accordance with the local legislation)
	Water usages during construction	A water rationale use must be implemented to reduce and avoid excessive and uncontrolled uses of water. Revisions of temporary infrastructure must be performed frequently during construction to prevent leakages
	Unnecessary uses and abuse of electricity and or fuel consumption during construction and operating phases	Promote and make an efficient use of equipment and machinery, using them only when needed. Turn off equipment not in use, such as: lights, refrigeration (AC), etc.
	Affectation on surroundings	Work debris and other solid wastes and materials used during construction will not be kept uncared off, also avoid dispersing along the project site. All debris and solid waste shall be covered with liners and be stored in places to avoid being dragged away by rain runoff. Debris must be removed from premises every 5 days
	inadequate uses of construction materials, such as lead paints, asbestos and such	All materials used for the project will be from authorized sources, quarries, wood storehouses, etc. Prevent and avoid uses of toxic materials in the project.
	Inadequate segregation and temporary storage of toxic and dangerous materials, including Electrical Wastes during construction and operational phases	Prepare and implement a Toxic and Dangerous Management Plan that include Electrical wastes (E-Wastes). This plan must include monitoring and registry.
	Improvement in working conditions to ensure	Prepare and implement a Labor Management Procedure for the project's different implementation sites.

Media	Risk and Impacts	Mitigation opportunities
	better environmental practices	
	Risks of electrical current tension/voltage alteration that could cause fires	Implement tension and voltage stabilizing equipment to prevent alteration on the electrical installations
Social	Risk to create access barriers to persons with disability	Assurance to include universal access design and other appropriate measures to avoid this issue in all rehabilitating infrastructure activities.
	Improve the access to data for vulnerable groups	Include measures to make sure that vulnerable groups are accounted for during the design and implementations stage This will be achieved through the implementation of the Stakeholder Engagement Plan and the design and implementation of an outreach strategy.
	Risks of not sufficient trained personnel	Initially reinforcement with international expertise. Initiate training processes for local individuals.

8.2 Specific Guidelines for the Preparation of the Environmental and Social Management Plans (ESMPs)

These site specific ESMPs will be prepared based on relevant ESSs and the technical norms and local legislations that are pertinent to the project design and implementing process during the construction, implementation and closing phases. The following plans have been identified for the project based on the activities to be financed.

8.2.1 Environmental and Social Management Plan

An ESMP must include the following items, as indicated in the above-mentioned sections:

- **Legal Framework**

This will support the bases of the ESMP's in each one of the project implementation locations, and this is based in the National legislature, regulations, resolutions, norms, international treaties, and other legally binding instruments that applies to the project.

- **Institutional Framework**

This includes the institutions involved in the project administration, management and operations. These will be identified and their roles and responsibilities during project phases (pre-construction, construction and operations) will be defined.

- **Implementation Plan**

Without considering the size and complexity of a project, a schedule for all project activities must be prepared using a double entry matrix where activities are set against execution time, with estimated starting and finishing dates for the project implementation.

- **Environmental and Social Risks: Mitigation Measures Adopted**

E&S risks and impact identification and assessment will need to be carried out. Specific risks analysis of the specific subproject implementation will be required to be part of all ESMP's for each implementation project sites, including those regarding violence and gender issues. These specific ESMP's must include prevention, avoidance and mitigation measures that will be identified, and previously approved by projects authorities before the ESMP's implementation. The ESMPs shall also include the OHSP and the E-waste management plan.

- **Budget and Costs**

In each phase of the project a budget with the costs of the ESMP must be prepared, specifically for each managerial action proposed and included in the ESMP. These budgets must be prepared in charts showing costs estimations categorized for each managerial activity presented, including those contingency expenditures and expending charted chronogram. The budget will be itemized, following the project administrative/financial organization protocols

- **Public Consultation Mechanism**

The information provided to the project participants and workers, as well as the users of the buildings and other stakeholders must be provided early on and through appropriate means and formats so it is accessible in a timely manner. Procedures must be established for solicitation, convened and training to workers and affected areas. Amongst the potential topics to cover are: labor ethics, responsibilities and rights, sustainable daily issues and behavior, care for nature and biodiversity, environmental management. For information mechanisms to building users and workers the following could be included: written information (press), radio, internet, social medias, workshops, etc. For public consultation of project activities must be performed before and during the project implementation, at the design level in the pre-construction phase. This activity is a mandate of ESS10 and requires enabling stakeholder's active

participation and will be continuous throughout the all the project phases. The result of consultations will be included in the ESMP's for the different project activities.

- **Grievance Mechanism (GM)**

The procedures for the GM are based on the ESS10 of the WB, this process will follow a format as presented in Section 11 of this ESMF. In general terms will include actions such as registry and chart log of visits, complains, observations, and comments of all interest parties.

- **Follow-up and evaluation**

The mechanisms for follow-up and evaluation must be design and implemented throughout the project phases, to have controls of all actions, by measuring its efficiency and effectiveness and compliance. This will assist in preparing evaluation reports that will address the improvement or actions required. This mechanism will include project supervision from the Project Implementation Unit, contracted supervision and World Bank supervision. It will require reporting (weekly, monthly, quarterly), inclusive of daily logs, verification and technical, environmental and engineering reports as agreed

- **Adaptive management arrangements**

These are defined as alternative managerial actions different from what was originally planned. These managerial arrangements are to be adopted due to changes that occur during project implementation, caused by unforeseen events that generate a need for an adaptive management decision in view of the new and unexpected situation

8.2.2 Waste Management During Construction, Operation and Closure Phase

The following guidelines are included in order to develop the Waste Management Plan (WMP) during the construction, implementation and closing phases. The WMP must follow and comply with the ESS1 of the Environmental and Social Framework, and its extent of application will depend on the project activities that will be performed at each project site. It will include the integral management of solid, liquid, and gases wastes. It shall include measures to manage asbestos and other dangerous materials (electrical wastes, toxic chemicals and paints, etc.), that could be used or be generated during the demolition, construction, upgrade or renewal of installations and infrastructure; as well during implementing activities (paper, office materials, paints, etc.), replacement of electrical equipment (computers, servers, cables, etc.). This plan must comply with the existing country legislation and regulations. The basic content should include:

- Objective of the managerial waste plan
- Legal frame
- Institutional frame
- Site and surroundings diagnostics and characteristics
- Possible environmental and social impacts
- Evaluation of the environmental and social impacts
- Measurements for waste management during construction and operational phase of the project

- Arrangements for permits for final disposal of the different types of wastes that the plan entitles
- Implementation plan
- Budget and costs
- Stakeholders Consultation plan
- Grievance Redress Mechanism
- Follow up and evaluation
- Adaptive management arrangements

Objective of Waste Management Plan

Based on ESS1 and ESS3, the plan must stablish responsibilities in relation with the risk and impact levels during the different project phases. Thus, the generation of waste must be considered from the very beginning; during the predesign contracting, construction and implementing phases. In all cases previsions shall be taken in order to minimize the production of waste, and those that can be minimized must follow an integrated management plan to properly reduce, manage, and dispose all types of waste that could be generated by all the different project activities. By doing so, the project will avoid negative effects of the project with respect to waste generation.

Guidelines for the development of the Waste Management Plan including specifications for e-waste have been prepared for the project and are included as Annex 4 of the ESMF.

8.2.3 Labor Management Procedures

This procedure seeks to ensure the inclusion of measures, to manage risks associated with employment under the project, and to help determine the resources needed for planning and management. It sets out the approach to meet the national requirements, as well as the objectives of the World Banks's Environmental and Social Framework, specifically the objectives and requirements of ESS2: Labor and Working Conditions and Occupational Health and Safety. Based on the Project's Environmental and Social Assessment, for this project, risks are considered minimal in regard to labor and working conditions, as well as occupational health and safety. During operations the Plan will ensure that project management will be committed on a continuous basis throughout the life of the project, to evaluate risks and impacts and to have in place adequate measures and procedures to manage adverse impacts. The Code of Conduct will also be adopted throughout project implementation (Annex 2). It is important to note the LMP is a live document and can be updated to meet the demands of the project. The basic contents of a Labor Management Procedures include:

- Objective of Labor Management Procedures
- Legal frame
- Institutional frame
- Standard code of conducts for workers
- Implementation plan
- Budget and costs
- Stakeholders Consultation plan
- Grievance Redress Mechanism

- Follow up and evaluation
- Adaptive management arrangements
-

Objective of Labor Management Procedures

These are based to comply with the ESS1, ESS2 and ESS4 (Environmental and Social Standard of the World Bank), in relation with the evaluation and level of the project site, implementation phase and the risks that it imposes, for the safety and health of workers, and other stakeholders. This activity and its codes of conduct are designed in phases and in joint and inclusive effort. All workers must adhere to this procedure and ensure to fulfil their contracted duties and assignments, obeyance and respect to gender and ranks, care and well behaviour and good practice at work and with natural surroundings and biodiversity.

Stand-alone LMP has been developed for the project.

8.2.4 Occupational Health and Safety

During project implementation and with the implications that involve, creates the need of an Occupational Health and Safety, measures to be developed to prevent harm and ensure the health and safe working conditions and security to the personnel involved in the project activities. Occupational Health and Safety considerations are reflected in the LMP.

Objective of Occupational Health and Safety Plan

This specific instrument is based on those mandates of ESS1 and ESS2, that establish the mechanism for the Occupational Health and Safety Plan (OHSP) (Annex 3 of this ESMF) and ensure that is in line with the World Bank Group EHS Guidelines and its specific Occupational Health and Safety (OHS), to ensure health and safety of workers during construction activities during a project implementation, with the purpose to avoid, minimize and mitigate those potential impacts that the activity could cause, and to avoid harm or any danger to peoples.

Annex 3 includes a generic guideline to be used for the development of the Occupational Health and Safety Plan to be included in the ESMPs to be prepared for each participant country.

8.2.5 Code of Conduct

The guideline for preparing the Standard Code of Conduct aim at all Project Workers who participate in various stages of the project: pre-investment, preparation and implementation. This guidance follows the objectives of Environmental and Social Standard of the WB: ESS1, ESS2, and ESS4 and the content of it will depend upon the specific characteristics of each subproject. The code of conduct applies to workers classified as direct, hired and community or voluntary. For the project, this code of conduct will specifically apply to direct workers, PIU workers, Infrastructure Management Personnel, Builders and Construction Supervisors, and others as defined necessary during project implementation. Hired workers Contractors

and subcontractors, hire workers to carry out construction, supervision, supply of materials and equipment. The basic content for the code of conduct should include:

- Objective of the Standard Code of Conduct for Workers
- Legal framework
- Institutional Framework
- Standard Code of Conduct for Workers
- Implementation schedule
- Costs and budget
- Information and consultation mechanism
- Mechanism for handling complaints and claims
- Monitoring and evaluation
- Arrangements for adaptive management

Annex 2 includes a generic code of conduct which needs is hereby adopted and can be further tailored for use on the project.

8.2.6 Emergency Readiness Plan

The following guidelines are presented in order to elaborate an emergency readiness plan that could be implemented during the implementation process of project activities. These guidelines follow the mandates of ESS1, and its conditions will be dependent upon each activity phase and site. The risk and hazards to confront can be from natural or anthropic origin, quakes, hurricanes, contamination, fires; in all cases the plan is designed to avoid and prevent these events or in case of unavoidable events, to react and reduce its effect and harm to the stakeholders, workers and infrastructure. The basic contents of an Emergency Readiness Plan should include:

- Objective for the Emergency Readiness Plan
- Description of the Project and site characteristics
- Legal Frame
- Institutional frame
- Potential environmental and social impacts
- Values and compensation for losses
- Permits arrangements
- Standard code of conducts for workers
- Implementation plan
- Budget and costs
- Stakeholders Consultation plan
- Grievance Redressal Mechanism
- Follow up and evaluation
- Adaptive management arrangements

Objective of Emergency Readiness Plan

These objectives must be conceived to comply with ESS1, in regard to the evaluation, management and follow-up of risks and environmental impacts for the project phases. In the case of the Emergency Readiness Plan must be conceived since early stages of the project, pre-construction, construction and operational phases, in order to ensure minimal effects and damage by catastrophically and or accidental events.

9 Institutional Arrangements for Implementing the Environmental and Social Management Framework

9.1 Structure of Management and Supervision Teams

The OECS has some familiarity with the World Bank ESF. However, they do not have a dedicated unit or staff on environmental and social risk management. The OECS will need to hire the service of an environmental and social specialist(s) as individual consultant or supervision consultant with environmental and social monitoring and reporting included within the Scope of Work. There will also be one environmental and social specialist engaged at each of the country-level PIUs. This will ensure that the contractor(s) follow the environmental and social requirements under the contracts and implement the Environmental and Social Management Plans for the duration of the work.

9.2 Roles and Responsibilities

Implementation and monitoring of the Environmental and Social Management Framework (ESMF) and all other Environmental and Social Standards (ESS) instruments will be the responsibility of each implementing agency, that is OECS for regional project activities, and the line ministry responsible for the statistical offices in each country for national level project activities. Coordination with stakeholders at the national level for regionally implemented activities will be built-in to each contract implemented by the regional PIU, and the PIU will be responsible for monitoring of adherence to ESS instruments for the activities. For example, consultants conducting any legislative reviews will be required to consult with relevant stakeholders in each country and also provide support to the national legislative drafting units to transpose recommendations to national legislation, while adhering to the requirements of applicable ESS instruments identified by the regional PIU. For this, both the OECS and the project implementation units at the national levels, will engage/appoint Environmental and Social Specialists who will support this function, and within thirty (30) days of the Effective Date of the Project. The details on the roles and responsibilities for the ESMF are provided below (Table 9.1).

Table 9.1- ESMF roles and responsibilities

Role/Position Title	Responsibilities
OECS Regional Project Coordinator OECS Regional Environmental & Social Specialist(s)	• Dissemination of project information pertaining to implementation of regional level project activities; • Manage and implement the Environmental and Social Framework (ESMF) for regional level project activities.
National PIU Project Coordinator(s) National PIU Environmental & Social Specialist(s)	• Dissemination of project information pertaining to implementation of national level project activities; • Manage, monitor and enforce World Bank Environmental and Social Standards and the

Role/Position Title	Responsibilities
	relevant national legislation pertaining to labor, health and safety, grievance redress mechanism, environmental and social performance throughout the implementation of the project in their respective countries.

9.3 Supervision and Reporting

The project will be supervised by Regional PIU staff, National PIUs staff, and other relevant government agencies.

Monitoring during project implementation provides information about key environmental and social aspects of the project, particularly the environmental and social impacts of the project and the effectiveness of mitigation measures. This allows the Project to evaluate the success of mitigation as part of project supervision and allows corrective action to be taken when needed. The project will provide bi-annual reports to the World Bank.

9.4 Budget and Resourcing

The estimated cost and schedule for the items associated with the implementation of the ESMF are outlined below. These will be reviewed and updated by the Regional and National PIUs and subject to clearance by the World Bank.

Table 9.2- Indicative budget for ESMF implementation

Item	Schedule	Annual cost
Revise ESMF and ESMPs based on final design	First year of project implementation	USD $10,000
Implement the ESMF	Throughout project implementation	To be defined during of implementation phase and as part of the formulation of potential ESMPs
Recruit Environmental and Social Safeguards Specialists	Full-time throughout project implementation (engaged within 30 days of project effectiveness)	USD $160,000

Implement the ESMPs	Throughout project implementation	To be defined at early stages of project implementation

10 Project Grievance Mechanism

The project and its associated activities may have some short term and reversible impacts. In order to ensure the implementation of the Project in a timely manner and effectively address any anticipated and unanticipated risks that would be encountered during implementation, including the development of the necessary actions of mitigation and avoidance, a robust Grievance Mechanism (GM) was developed. The GM will enable the Project Authorities to address any grievances against the Project. It must be noted that this GM covers grievances that relate to the impacts that the project may have on people as presented in the SEP.

It must be noted that grievances which relate to project workers will be handled by a separate Workers Grievance Mechanism which is included as part of the project's Labor Management Procedures (LMP) that has been prepared.

The objectives of the Grievance s Mechanism are as follows:

1. Ensure that the World Bank Environmental and Social Standards are adhered to in all subprojects and activities;
2. Address any negative environmental and social impacts of all sub-projects and activities;
3. Support managing all grievances emanating from the project activities in a timely manner;
4. Establish relationships of trust between project staff and stakeholders;
5. Create transparency among stakeholders including affected persons through an established communication system;
6. Bolster the relationship trust amongst the project staff and the affected parties.

10.1 Grievance Process

The key stages involved in the project's grievance process are summarized below and described in the sections that follow.

Level One	1. Receive grievance 2. Acknowledge grievance 3. Register/Log 4. Screen 5. Investigate 6. Resolution
Level Two	Grievance Redress Committee (GRC)
Level Three	Local Courts

10.1.1 First Level of Redress

Receive Grievance

All complaints should be received by the Project Coordinator/ Environmental and Social Specialist of each implementing PIU. This includes the project contact personnel in each of the participating countries. Through the consultation process in each participating country, stakeholders will be formed of various avenues through which the mechanism can be accessed. Complaints can be made in person, writing, verbally over the phone, by fax, emails or any other media. The point of receipt of complaints is listed below:

Table 10.1- Contact information for persons to receive grievances

Contact	Grenada	St. Lucia	St. Vincent and the Grenadines	OECS
Name				
Title	Project Coordinator		Project Coordinator	
Telephone			784-457-1746	

Contact	Grenada	St. Lucia	St. Vincent and the Grenadines	OECS
Email address			cenplan@svgcpd.com	
Physical Address			1st Floor Administrative Building Bay Street Kingstown St. Vincent and the Grenadines	

All grievances received by the established points of contact within the individual nations should be forwarded to the Project Coordinator within 24 hours of receipt.

Modes of Receiving Grievances

Complaints can be made in person, writing, verbally over the phone, by fax, emails or any other media. The person receiving the complaint will try to obtain relevant information regarding the grievance and the complainant and will immediately inform the Project Coordinator at each PIU in the format – Grievance Information Form (GIF) as given in Annex 6- Grievance Information Form

Acknowledge Grievance

All grievances will be acknowledged in writing by the PM using the Grievance Acknowledgment Form (Annex 7- Grievance Acknowledgement Form) within 48 hours of receipt and the complainant informed of the approximate timeline for addressing the complaint, if it can't be addressed immediately. The PM will work with the Country Ministries or contractors to ensure the speedy resolution of the grievance. If the complaint cannot be resolved at this level it is taken to the next level.

Register/Log Grievance

After receiving and recording the grievance on the GIF, it will be registered in the Grievance Log (Annex 8- Grievance Log).

Screen

The concerned PM reviews the complaint and assign a grievance owner. The complaint will be forwarded to the grievance owner who will be responsible investigating the claim and liaising with both the aggrieved party and project staff in order to come to a mutually acceptable resolution. The grievant owner will be given a specific timeline for resolving the claim. Meetings with grievant/complainant will be held, if necessary, in an attempt to resolve the matter.

Investigate

The grievance owner will investigate the complaint. This investigation will include, but is not limited to, meetings with the grievant/complainant, site visits, meetings/interviews with project staff and collection of relevant documentation and other forms of evidence. For meetings, the deliberations and decision will be recorded on the Meeting Record Form included as Annex 9- Meeting Record Form. Community representatives or representatives of the complainant will be allowed to sit in on these meetings.

Resolution

The resolution of the complaint, at the first tier, should be completed within 15 working days of receipt of grievance and the proposed solution to the complaint notified to the concerned party through the Disclosure Form (Annex 10- Disclosure/Release Form). If the grievance is not be resolved within this period, it can be referred to the next level of the Grievance Redressal system, as indicated above (GRC and Courts). However, once it is determined that progress is being made towards a resolution, the grievance will be retained at this first level. The complainant will be informed of this decision and an estimated time for the resolution of the matter will be given in writing. If the issue cannot be resolved within 25 working days, it will be transferred to the next level. Once a resolution has been agreed and accepted and recorded in writing, the complainant's acceptance will be obtained on the Disclosure Form included as Annex 10. If the proposed resolution is not accepted the grievance will be escalated to level 2. All these steps, exchanges with the complainants will be recorded in detail in the grievance log for the project under the responsibility of the PM/ES specialists.

The complainant may request that the issue be transferred to the next level if he or she does not feel that the grievance is being adequately addressed by the PM.

10.1.2 Second Level of Redress

A Grievance Redressal Committee (GRC) will be formed in each implementing entity, that will consist of members of their respective Project Steering Committees (Regional project Steering Committee, in the case of OECS), civic leaders and relevant representatives. The GRC will be called into place when a first-tier resolution is not found, but it could also meet on a quarterly basis to evaluate the performance of the project level GM. From this perspective it is a standing body.

This committee will be chaired by the representative of the implementing line ministry/agency in the corresponding Project Steering Committee. The permanent secretaries of the participant ministries will assign their respective representative to the GRC. The way in which the representative of the civil society will be defined is still TBD, but line ministry or the PIU can invite active NGOs to nominate a representative.

Terms of Reference for GRC:

The functions of the GRC are as follows are to:

1. Provide relief and support to the affected persons in a timely manner;
2. Prioritize grievances and resolve them at the earliest reasonable time;

3. Provide information to PIUs on serious cases at the earliest plausible time;
4. Coordinate the process of the Affected Persons getting proper and timely information on the solution worked out for his/her grievance;
5. Study the normally occurring grievances and advise the PM as to their scale and scope.

The PM will coordinate the convening of the meetings of the GRC. He / She is also responsible for briefing the GRC on the deliberations of the first level of Redressal and on the views of both parties. (Complainant and the Project).

The GRC will hold the necessary meetings with the affected party / complainant and the concerned officers and attempt to find a solution acceptable at all levels. GRC will record the minutes of the meeting in the format using the same format detailed in Annex 4. The decisions of the GRC will be communicated to the complainant formally and if she/he accepts the resolutions, the complainant's acceptance will be obtained on the disclosure format as in Annex 5.

If the complainant does not accept the solution offered by the GRC, then the complaint is passed on to the next level / or the complainant can activate the next level. It is expected that the complaint will be resolved at this level within 35 working days of receipt of the original complaint. However, if both parties agree that meaningful progress is being made to resolve the matter may be retained at this level for a maximum of 60 working days.

10.1.3 Third Level of Redress

If the affected party / complainant does not agree with the resolution at the 2nd level, or there is a time delay of more than 60 working days in resolving the issue, the complainant can opt to consider taking it to the third level. This level involves the complainant taking legal recourse within the local courts.

The complainant is always free to resort to the project GRM, including local courts, without any fear of retaliation, which is strictly prohibited under the project.

10.2 Addressing Complains with Allegations of Sexual Harassment and/or Sexual Exploitation and Abuse

The GM will specify an individual who will be responsible for dealing with any SH/SEA complaints, should they arise. A list of gender-based violence (GBV) service providers shall be kept available by the project. The GM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

If a SH/SEA project-related incident and complaint occurs, it will be reported through the GM, as appropriate and keeping the survivor information confidential. Specifically, the GM will only record the following information related to the SH/SEA complaint:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of their knowledge, the perpetrator was associated with the project; and,
- If possible, the age and sex of the survivor.

Any cases of SH/SEA brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. Here, the GM will primarily serve to:

- Refer complainants to the GBV Services Provider; and
- Record the resolution of the complaint

The GM will also immediately notify both the Implementing Agency and the World Bank of any GBV complaints **WITH THE CONSENT OF THE SURVIVOR**.

10.3 GM Budget

Item	Cost (US$)
Meetings of GRC	5,000.00
Information Production and Dissemination	5,000.00
Total	**10,000.00**

10.4 Building GM Awareness

The E&S staff will initially brief and train staff of the project office, any consultants and/or contactors, and the staff of the individual country Ministries on the Grievance Redressal Mechanism of the Project and explain to them the procedures and formats to be used including the reporting procedures.

The ES staff of the project team will disseminate information to all project stakeholders on the Grievance Mechanism of the Project and explain the procedures and formats to be used including the procedures for filing complaints. Awareness campaigns would be conducted targeting project stakeholders to inform them on the availability of the mechanism; various mediums will be used- as detailed in previous sections of the SEP, and also the prohibition of retaliation for anyone that may wish to lodge a complaint. The GM will also be published on the OECS website, responsible Ministries/NSOs in each participating country's website and the project website or Facebook page if there is one. The GM will be translated into local and colloquial expressions if determined to be needed.

10.5 Monitoring and Reporting

The E&S team will prepare the Monthly and Quarterly Reports on the Grievances of the project, including status, accountability and timeframes for resolution. GM reporting will also be included in the reports submitted to the World Bank.

10.6 Periodic Review by the Grievance Redress Committee

The Grievance Redressal Committee may review the nature of grievances that have been represented and if grievances are repeated, recommend suitable changes in implementation procedures and forward these to the regional PIU for implementation.

11 Disclosure and Public Consultation

This ESMF document is being shared with the relevant stakeholders in order to inform them of project activities, identify any additional relevant concerns or issues, and thereby improve the quality and usefulness of the Final ESMF document.

The ESMF contains measures to mitigate the potential risks and impacts that are included in the Environmental and Social Management Plans (ESMPs) which form part of the ESMF. The ESMP also includes a Waste Management Plan (WMP) to mitigate any risks and impacts associated with the disposal of project-generated waste. These documents are also being published to solicit stakeholder input.

Finally, a Stakeholder Engagement Plan (SEP) with its GM, Labour Management Procedures (LMP) with its GM and a Social Assessment (SA) have also been prepared. All these documents are being disclosed on the Government's website in draft form as part of the consultation process.

11.1 Disclosure

Above all there must be community consultation before and during project implementation. This will allow for the development of open communication or rapport between the community and the OECS and governments of Grenada, Saint Lucia and Saint Vincent and the Grenadines. It will allow for concerns to be addressed upfront and the affected community would have greater tolerance to the inconveniences experience. They are also the ones on the ground and their concerns and recommendations should have merit. Public Consultation is critical for this type of project - specially to gain community support and 'buy in'.

Evidence of stakeholder input includes public attendance record sheets, links to published documents, screen image of publication of ESMF requesting public comment, notification in newspapers, and/or e-mails to key organizations or individuals.

The OECS and governments of Grenada, Saint Lucia and Saint Vincent and the Grenadines should make provisions for the relevant Ministries to organize public consultation forums with the affected communities, interested organizations and individuals as often as is necessary. A Public Consultation Plan should be prepared by the relevant government ministries, which among other things, identifies the target groups, schedule, information to be disseminated (ESF instruments etc.) how and where it would be disseminated.

11.2 Public meetings

As part of the stakeholder engagement process, described in the SEP, public meetings and consultation will continue during the life of the project, in participating countries.

Considering current COVID-19 situation, the following methods will also be considered for future consultations: i) Make a short video (that can be transmitted by WhatsApp) the video should present the

objectives of the project and the main risks and benefits; ii) Share the link from where the documents are available on the Client website; iii) Distribute a feedback form on participants' opinions on the main risks and benefits - from the perspective of the stakeholders. -Copy of the Transcript of the short video can be shared; iv) Conduct feedback collection directly over the phone - especially for people who do not have Internet access; and v) Prepare the summary of the comments received and actions taken to address the comments.

Evidence of meetings includes public attendance record sheets, meeting minutes, photographs, presentations, publication of ESMF requesting public comment, notification in newspapers, and/or e-mails to key organizations or individuals.

11.3 Revision/Disclosure of Final ESMF

The draft ESMF will be revised to incorporate relevant stakeholder comments generated from consultation meetings. The revised ESMF shall be adopted and disclosed, no later than 45 days after the Financing Agreement's Effective Date.

The draft final versions of the ESMF will be published on the OECS and Governments of the Grenada, Saint Lucia and Saint Vincent and the Grenadines websites as well as on the World Bank website, as listed below:

OECS: www.oecs.org
Grenada: www.gov.gd
Saint Lucia: www.govt.lc
Saint Vincent and the Grenadines: www.gov.vc

12 Annex 1- Guidelines for development of site-specific ESMPs.

This section represents the guidelines that should be followed if, after the initial screening, it is determined that a site-specific ESMP is required to properly manage environmental and social risks at any particular sub-project site. Any such ESMP will be prepared based on the technical norms and local legislation that are pertinent to the project design and implementation during the sub-project activities. The following should be included in site-specific ESMPs.

- **Legal Framework**

This will support the bases of the ESMP's in each one of the project implementation locations, and this is based in the National legislature, regulations, resolutions, norms, international treaties, and other legally binding instruments that applies to the project.

- **Institutional Framework**

This includes the institutions involved in the project administration, management and operations. These will be identified and their roles and responsibilities during project phases (pre-construction, construction and operations) will be defined.

- **Implementation Plan**

Without considering the size and complexity of a project a schedule, all project activities must be prepared using a double entry matrix where activities are set against execution time, with estimative starting and finishing dates for the project implementation.

- **Environmental and Social Risks: Mitigation Measures Adopted**

Specific risks analysis of the specific subproject implementation will be required to be part of all ESMP's for each implementation project sites, including those regarding violence and gender issues. These specific ESMP's must include prevention, avoidance and mitigation measures that will be identified, and previously approved by projects authorities before the ESMP's implementation.

- **Budget and Costs**

In each phase of the project a budget with the costs of the ESMP must be prepared, specifically for each managerial action proposed. These budgets must be prepared in charts showing costs estimations categorized for each managerial activity presented, including those contingency expenditures and expending charted chronogram. The budget will be itemized, following the project administrative/financial organization protocols

- **Public Consultation Mechanism**

The information provided to the project participants and workers, as well as the communities and stakeholders must be early and appropriate. Procedures must be established for solicitation, convened and training to workers and affected communities. Amongst the potential topics to cover are: labor ethics,

responsibilities and rights, sustainable daily issues and behavior, care for nature and biodiversity, environmental management. For information mechanisms to communities and workers the following could be included: written information (press), radio, internet, social medias, workshops, etc. For public consultation of project activities must be preform before the project implementation, at the design level in the pre-construction phase. This activity is a mandate of ESS10 and demands the local stakeholder's active participation and will be continuous throughout the all the project phases and live. The resultant consultations will be included in the ESMP's for the different project activities.

- **Grievance Mechanism (GM)**

The procedures for the GM are based on the ESS10 of the WB, this process will follow a format as presented in Section 11of this ESMF. In general terms will include actions such as registry and chart log of visits, complains, observations, and comments of all interest parties.

- **Follow-up and evaluation**

The mechanisms for follow-up and evaluation must be design and implemented throughout the project phases, to have controls of all actions, by measuring its efficiency and effectiveness and compliance. This will assist in preparing evaluation reports that will address the improvement or actions required. This mechanism will include project supervision from the Project Implementation Unit, contracted supervision and World Bank supervision. It will require reporting (weekly, monthly, quarterly), inclusive of daily logs, verification and technical, environmental and engineering reports as agreed

- **Adaptive management arrangements**

These are defined as alternative managerial actions different from what was originally planned. These managerial arrangements are to be adopted due to changes that occur during project implementation, caused by unforeseen events that generate a need for an adaptive management decision in view of the new and unexpected situation

13 Annex 2- Sample Code of Conduct (to adjust with missing information and include in all Contracts financed under the Project)

CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

We are the Contractor, [*enter name of Contractor*]. We have signed a contract with [*enter name of Employer*], for [*enter description of the Works*]. These Works will be carried out at [*enter the Site and other locations where the Works will be carried out*]. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation, sexual abuse and sexual harassment.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, labourers and other employees at the Works Sites or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as **"Contractor's Personnel"** and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor's Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

Contractor's Personnel shall:

1. Carry out his/her duties competently and diligently.
2. Comply with this Code of Conduct and all applicable laws, regulations, and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person.
3. Maintain a safe working environment including by:
    a) ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
    b) wearing required personal protective equipment (PPE);
    c) using appropriate measures relating to chemical, physical and biological substances and agents; and
    d) following applicable emergency operating procedures.
4. Report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and danger to his/her life or health;

5. Treat other people with respect and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. Not engage in Harassment (sexual or non-sexual in nature), which means unwelcome (sexual) advances, requests for sexual favours, and other verbal or physical conduct (of a sexual or non-sexual nature) with other Contractor's or Employer's Personnel;
7. Not engage in Exploitation (sexual or non-sexual in nature), which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual or non-sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual or non-sexual exploitation of another. In Bank financed operations/projects, sexual or non-sexual exploitation occurs when access to or benefit from Bank financed Goods, Works, Consulting or Non-consulting services is used to extract sexual or non-sexual gain;
8. Not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal coercive conditions;
9. Not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. Complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
11. Report violations of this Code of Conduct;
12. Not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Redress Mechanism.

RAISING CONCERNS

If any person observes behaviour that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter name of the Contractor's Social Expert with relevant experience in handling sexual exploitation, sexual abuse and sexual harassment cases, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters*] in writing at this address [ ] or by telephone [ ] or in person at [ ]; or
2. Call [ ] to reach the Contractor's hotline (*if any)* and leave a message.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the persons who experience the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

FOR CONTRACTOR'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of Contractor's contact person(s) with relevant experience (including for sexual exploitation, abuse and harassment cases) in handling those types of cases]* requesting an explanation.

Name of Contractor's Personnel: [*insert name*]

Signature: _____

Date (day/month/year/): _____

Countersignature of authorized representative of the Contractor:

Signature: _____

Date (day/month/year/): _____

14 Annex 3- Occupational Health and Safety Plan

14.1 Principles

Employers must take all reasonably practicable steps to protect the health and safety of all project workers and to provide and maintain a safe and healthy working environment. The following key principles are relevant to maintaining worker health and safety:

14.1.1 Identification and assessment of hazards

Each employer must establish and maintain effective methods for:

- Systematically identifying existing and potential hazards to employees;
- Systematically identifying, at the earliest practicable time, new hazards to employees;
- Regularly assessing the extent to which a hazard poses a risk to employees.

14.1.2 Management of identified hazards

Each employer must apply prevention and control measures to control hazards which are identified and assessed as posing a threat to the safety, health or welfare of employees, and where practicable, the hazard shall be eliminated. The following preventive and protective measures must be implemented order of priority:

- Eliminating the hazard by removing the activity from the work process;
- Controlling the hazard at its source through engineering controls;
- Minimizing the hazard through design of safe work systems;
- Providing appropriate personal protective equipment (PPE)
- Ensuring safety signage at locations where a hazard threatens the safety of a worker (each safety sign shall be classified by hazard risk to help determine what sign to use, including danger, warning and caution).

The application of prevention and control measures to occupational hazards should be based on comprehensive job safety analyses (JSA). The results of these analyses should be prioritized as part of an action plan based on the likelihood and severity of the consequence of exposure to the identified hazards.

14.1.3 Training and supervision

Each employer must take all reasonably practicable steps to provide to employees (in appropriate languages) the necessary information, instruction, training and supervision to protect each employee's health and to manage emergencies that might reasonably be expected to arise in the course of work. Training and supervision include the correct use of PPE and providing employees with appropriate incentives to use PPE, understanding the different types of safety signage, Covid-19 transmission

prevention measures, and other specific OHS related practices applicable to the type of work to be implemented

14.1.4 General duty of employees

Each employee shall:

- Take all reasonable care to protect their own and fellow workers health and safety at the workplace and, as appropriate, other persons in the vicinity of the workplace;
- Use PPE and other safety equipment supplied as required; and,
- Not use PPE or other safety equipment for any purpose not directly related to the work for which it is provided;
- Follow all safety signage and ensure these are properly set in the project location and maintained throughout the duration of the activities;
- Adopt and maintain all Covid-19 transmission prevention measures;
- Participate in all OHS trainings and inductions.

14.1.5 Protective clothing and equipment

Each employer shall:

- Provide, maintain and make accessible to employees the PPE necessary to avoid injury and damage to their health;
- Take all reasonably practicable steps to ensure that employees use that PPE in the circumstances for which it is provided; and,
- Make provision at the workplace for PPE to be cleaned and securely stored without risk of damage when not required.

14.1.6 Design

Effective management of health and safety issues requires the inclusion of health and safety considerations during design processes in an organized, hierarchical manner that includes the following steps:

- Identifying sub-project health and safety hazards and associated risks as early as possible in the sub-project cycle including the incorporation of health and safety considerations into the worksite selection process and construction methodologies;
- Involving health and safety professionals who have the experience, competence, and training necessary to assess and manage health and safety risks;
- Understanding the likelihood and magnitude of health and safety risks, based on:
    - The nature of the sub-project activities, such as whether the sub-project will involve hazardous materials or processes;

- The potential consequences to workers if hazards are not adequately managed;

- Designing and implementing risk management strategies with the objective of reducing the risk to human health;
- Prioritising strategies that eliminate the cause of the hazard at its source by selecting less hazardous materials or processes that avoid the need for health and safety control;
- When impact avoidance is not feasible, incorporating engineering and management controls to reduce or minimize the possibility and magnitude of undesired consequences;
- Preparing workers and nearby communities to respond to accidents, including providing technical resources to effectively and safely control such events, in particular relating to traffic;
- Improving health and safety performance through a combination of ongoing monitoring of facility performance and effective account ability.

14.2 Implementation

14.2.1 Documentation

An OHSP must be prepared and approved prior to any works commencing on site. The OHSP must demonstrate the Contractor's understanding of how to manage safety and a commitment to providing a workplace that enables all work activities to be carried out safely. The OHSP must detail reasonably practicable measures to eliminate or minimize risks to the health, safety and welfare of workers, contractors, visitors, and anyone else who may be affected by the operations. The OHSP must be prepared in accordance with the World Bank's EH&S Guidelines and the relevant country health and safety legislation.

14.2.2 Training and Awareness

Provisions should be made to provide health and safety orientation training to all new employees to ensure they are apprised of the basic site rules of work at/ on the site and of personal protection and preventing injury to fellow employees. Training should consist of basic hazard awareness, site-specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Visitors are not permitted to access to areas where hazardous conditions or substances may be present, unless appropriately inducted.

14.2.3 Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems. PPE provides the worker with an extra level of personal protection. Recommended measures for use of PPE in the workplace include:

- Active use of PPE if alternative technologies, work plans or procedures cannot eliminate, or

sufficiently reduce, a hazard or exposure;

- Identification and provision of appropriate PPE that offers adequate protection to the worker, co-workers, and occasional visitors, without incurring unnecessary inconvenience to the individual;
- Proper maintenance of PPE, including cleaning when dirty and replacement when damaged or worn out. Proper use of PPE should be part of the recurrent training programs for Employees; and,
- Selection of PPE should be based on the hazard and risk ranking described earlier in this section and selected according to criteria on performance and testing established.

14.3 Monitoring

Occupational health and safety monitoring programs should verify the effectiveness of prevention and control strategies. The selected indicators should be representative of the most significant occupational, health, and safety hazards, and the implementation of prevention and control strategies. The occupational health and safety monitoring program should include:

- Safety inspection, testing and calibration: This should include regular inspection and testing of all safety features and hazard control measures focusing on engineering and personal protective features, work procedures, places of work, installations, equipment, and tools used. The inspection should verify that issued PPE continues to provide adequate protection and is being worn as required.
- Surveillance of the working environment: Employers should document compliance using an appropriate combination of portable and stationary sampling and monitoring instruments. Monitoring and analyses should be conducted according to internationally recognized methods and standards.
- Surveillance of workers health: When extraordinary protective measures are required (for example, against hazardous compounds), workers should be provided appropriate and relevant health surveillance prior to first exposure, and at regular intervals thereafter.
- Training: Training activities for employees and visitors should be adequately monitored and documented (curriculum, duration, and participant s). Emergency exercises, including fire drills, should be documented adequately.
- Accidents and Diseases monitoring. The employer should establish procedures and systems for reporting and recording:
    - Occupational accidents and diseases
    - Dangerous occurrences, incidents and accidents

These systems should enable workers to report immediately to their immediate supervisor any situation they believe presents a danger to life or health. Each month, the contractor shall supply data on trainings

delivered, safety incidents prevented and any accidents to the PIU. These data are to also include incidents related to any sub-contractors working directly, or indirectly, for the Contractor.

14.4 Prevention and management of incidents and accidents

In the context of the project, an "incident" will be considered an accident or a negative event that occurs as a result of any failure (or non-conformity) in the fulfillment, by any of the responsible parties, of the tasks/activities of the project or of the WB's EAS. Unexpected or unforeseen damaging events that may occur during project implementation will also be considered incidents. Examples of incidents in the context of this Guide include: fatalities, accidents or serious injuries; social impacts derived from the influx of foreign workers in the communities (labor influx); cases of Sexual Exploitation or Abuse (SEA) or other forms of gender-based violence (GBV); major environmental pollution events; loss of biodiversity or destruction of critical habitats; loss of physical cultural resources; or loss of livelihoods and/or access to natural resources by the community.

The scope of incident and accident management will not apply to those events that are not related to the project, for example, in the event of war actions or disasters due to adverse events that impact project workers or community members. However, in the case of relevant events (fatalities or other serious incidents) that occurred in the project environment, and even if they are not under its control, they must be reported to the Bank to be included, as appropriate, in a project document, such as the Aid Memories or others, as a record.

Table XX. Incident Classification Guide

Indicative
• Relatively minor and small-scale localized incident that negatively impacts a small geographical areas or small number of people • Does not result in significant or irreparable harm • Failure to implement agreed E&S measures with limited immediate impacts
Serious
• An incident that caused or may potentially cause significant harm to the environment, workers, communities, or natural or cultural resources • Failure to implement E&S measures with significant impacts or repeated non-compliance with E&S policies incidents • Failure to remedy Indicative non-compliance that may potentially cause significant impacts • Is complex and/or costly to reverse • May result in some level of lasting damage or injury • Requires an urgent response • Could pose a significant reputational risk for the Bank.
Severe
• Any fatality • Incidents that caused or may cause great harm to the environment, workers, communities, or natural or cultural resources • Failure to remedy serious non-compliance that may potentially cause significant impacts that cannot be reversed

- Failure to remedy Serious non-compliance that may potentially cause severe impactsIs complex and/or costly to reverse
- May result in high levels of lasting damage or injury
- Requires an urgent and immediate response
- Poses a significant reputational risk to the Bank.

Incident Management and Reporting Process

The project, through the PEU, must report the incidents to the Bank according to their severity and ensure an effective and appropriate response to such events. The incident management and reporting process is structured in the following stages:

1. Incident Report (In terms depending on severity)
2. Investigation (What happened? How and why?)
3. Response (Corrective Actions. Preventive Measures)
4. Follow-up (Is the response complete? Was it effective?)

1. Incident Report: The PIU shall notify the World Bank within a period of 48 hours, after receiving notice from the designated construction supervisor, of any incident or accident related to the Project that has or may have a significant adverse effect on the environment, affected communities, the public, or workers, including, but not limited to, any accident resulting in death, serious injury, or multiple injuries. It will be the responsibility of the Project to arbitrate all the means to know the events that occurred to understand the degree of severity of the situation and take the necessary response actions, including, and if necessary, ensure that the appropriate investigation of the incident is carried out corresponding to the same reporting and response requirements for the same. Confidentiality, the best short- and long-term interest of the survivor, and the safety of the survivor will be taken into account when reporting incidents of Sexual Exploitation or Abuse (SEA) or other forms of gender-based violence (GBV).

2. Investigation: In the case of serious incidents or when there is limited or contradictory information about the facts, it will be necessary to carry out an investigation into the causes of the incident, to assess its degree of severity and to define the next steps to follow. The Project (and/or the Contractor) will be responsible for conducting investigations to understand the facts on the ground. The Borrower shall ensure that incidents are investigated to establish what happened and why, so that procedures or measures can be implemented to prevent the recurrence of the events and that appropriate response or remedial actions are applied. It is essential that the project and the Bank have a clear understanding of the underlying cause(s) of the incident to agree on measures to prevent recurring events. When dealing with incidents of Sexual Exploitation or Abuse (SEA) or other forms of gender-based violence (VG), the project/contractor will not investigate directly, but will pass the case on to the competent Authority, as long as there is consent from the survivor and always handling the information with confidentiality and ensuring the safety of the survivor.

The scope of the incident investigation shall be acceptable to the WB. In particular, and if deemed necessary, the Bank may require the Borrower to carry out a Root Cause Analysis (RCA) or an equivalent investigation study to understand and document the underlying causes of the incident. In such cases, the Borrower shall ensure that the RTA is carried out as requested. The scope of the ACR investigation will be proportional to the severity of the incident. Carrying out an RCA will not always be mandatory; it will not be required particularly in those cases in which the information about the incident is clear and readily available.

The main objective of the RCA is Prevention and will be carried out by whoever is managing the site where the incident/accident occurred. The RCA[3] will address the following:

a. Determine what happened by identifying and describing the incident/accident. Include photos.
- i. What happened? Who was affected?
- ii. Where and when it happened.
- iii. What is the source of information? How did you find out about the incident/accident?
- IV. Are the basic facts of the incident/accident clear and indisputable, or are there conflicting accounts?
- v. What were the conditions or circumstances under which the incident/accident occurred?
- saw. Is the incident still ongoing or is it contained?
- vii. Is it a loss of life/s or serious damage?
- viii. How serious was the incident?

b. Determine the root cause (RCA) of the incident/accident
- i. Understand and document the root cause(s) of the incident and what may be due to the following factors:
  - a. Labor Procedures
  - b. equipment and technology
  - c. Organizational/systemic
  - d. Human factors.
- ii. The RCA should be based on existing national processes, where available. Only in the absence of systems or weak experience, the Contractor may need to hire consultants (national or international) to carry out the RCA.
- iii. An ACR will be completed as soon as possible, ideally within 10 days of the incident.
- IV. The contractor and the project will use the findings of the ACR to develop measures to be included in a corrective action plan.
- v. The RCA will be shared with the World Bank and full information on the incident will be provided.
- saw. Additional visits to the incident/accident site will be facilitated if necessary.

[3] While an RCA is not mandatory, especially in cases where the information is clear and available, it is essential that the Borrower and the Bank understand the underlying cause(s) of the incident in order to agree on measures to prevent recurrences.

c. Identify immediate corrective actions, as well as additional follow-up actions if any are required, with associated timelines.

3. Response: When the basic facts of the incident are sufficiently clear and unquestionable, in particular in the case of Indicative incidents, the documentation of the characteristics of the incident and its appropriate response according to the requirements of "Incident Report" can be the only action required of the Borrower. However, the Borrower must ensure that measures are taken to avoid the recurrence of these incidents, in order to avoid escalation (for example, verify that training has been increased in case of underuse of PPE). Evidence of these controls must be included in the Borrower's quarterly reports to the Bank.

In cases where the characteristics of the incident have prompted the Borrower to carry out an RCA or equivalent study, the Borrower will submit to the Bank an appropriate set of measures to address the underlying causes of the incident and to prevent its recurrence. These measures must be acceptable to the Bank. The findings of the ACR will be the basis for the implementation of the agreed measures that will be included in a "Corrective Action Plan (CAP)".

The Borrower will be responsible for designing the CAP, which must include actions, responsibilities, schedules for implementation, and a monitoring program by the Project/Contractor. The Borrower must ensure that the contents of the CAP are complemented by the existing safeguards/standards instruments for the project, and will be responsible for guaranteeing compliance, since they will configure new environmental, social, and occupational health and safety requirements for effective compliance.

4. Follow-up: Regardless of the scope of the response measures to the incident and regardless of its classification, it is appropriate to monitor the measures that have been implemented to prevent the recurrence of incidents. Evidence of this must be included in the Quarterly Reports. In the event that the Project has had to develop a CAP, it will also be responsible for executing it or verifying its execution by third parties that are under its supervision. The Bank will monitor the implementation of the CAP. The Project's responsibilities are to implement the CAP, monitor progress, and report to the Bank on implementation progress.

14.5 COVID-19 Considerations

The following should be considered in the prevention of the transmission of COVID-19 throughout the workforce.

14.5.1 Assessing workforce characteristics:

The contractor should prepare a detailed profile of the project workforce, key activities, schedules for said activities and the durations of contacts and rotations. This will allow the contractor to help identify appropriate Covid-19 mitigation measures.

14.5.2 Entry/Exit to the Sub-project work site

Entry to the sub-project work sites should be controlled and documented for both wub-project workers and the staff and other users who utilize the space in which the minor civil works will be completed. This will include:

1. Establishing a system to control entry/exit to the site and establishing entry and exit points (if they don't already exist. Entry and exit to the site should be documented.
2. Any security and/or regular staff monitoring in the work site should be trained to enforce the (enhanced) system that has been established, along with proper COVID-19 prevention specifications. This will include providing them with the resources needed to document entry of workers, conduct temperature checks and recording the details of persons entering and exiting.
3. Confirming that workers are fit for work prior to them entering the site and commencing work. Special attention should be paid to workers with underlying health issues or who otherwise would be at high risk. Consideration should be given to demobilization of staff who present high risk for COVID-19 contraction.
4. Checking and recording temperatures of workers and other users entering the site.
5. Provide regular briefings to workers, which would include the COVID-19 specific information such as, cough etiquette, proper uses of PPE, hand hygiene and physical distancing measures. Remind workers to self-monitor for COVID-19 symptoms and to report to their supervisor if they have any such symptoms or feel unwell.
6. Prevent a worker who has been in contact with a COVID-19 infected person from returning to the site for 14 days.
7. Prevent a sick worker from entering the work site and refer them to local health facilities and require them to isolate at home for 14 days.

14.5.3 General Hygiene

Information on general hygiene requirements as related to COVID-19 should be communicated and monitored. This should include:

1. Training workers on the signs and symptoms of COVID-19, how it is spread, how to protect themselves and what to do if they or others present with symptoms (for further information see WHO COVID-19 advice for the public and the National Regulations).
2. Placing posters and signs around the site with images and text in local languages which illustrate proper COVID-19 transmission prevention hygiene.
3. Ensuring that handwashing facilities with soap, disposable paper towels and close waste bins are provided at the site of the minor civil works. Where hand washing facilities do not exist, or are not adequate, arrangements should be made to have them established or properly supplied. Alcohol-based hand sanitizer (60-95%) can also be utilized.
4. Set aside an area that can be used for precautionary self-quarantine, prior to taking to a healthcare facility.

14.5.4 Cleaning and Waste Disposal

Regular, thorough cleaning of minor works sites should be completed. Cleaning protocols for any equipment used in the civil works should be followed especially of the equipment is being used by different workers:

1. Cleaning staff should be provided with adequate cleaning supplies and equipment.
2. Cleaning staff should be trained on appropriate cleaning procedures and frequency especially in any high use or high risk areas.
3. If cleaners will be required to clean areas that have been or are suspected to have been contaminated with COVID-19, they should be provided with the appropriate PPE- gowns or aprons, gloves, eye protection, masks, boots or other appropriate closed toe work shoes.
4. Train cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials).
5. Any medical waste produced during the care of ill workers should be collected safely in designated containers or bags and treated and disposed of following relevant requirements (e.g., national, WHO).

14.5.5 Adjusting work practices

Contractors could also consider adjusting their work practices to reduce or minimize close contact between workers.

1. Decrease the size of work trams
2. Limit the number of workers at any work site
3. Adapt or redesign work processes for specific work activities and tasks to enable physical distancing, and train workers on these processes
4. Continue with usual safety training, add COVID-19 specific considerations. Training to include the proper use of PPE.
5. Arranging (where possible) for work breaks to be taken in outdoor areas within close-proximity to the work site.
6. Stop work, if necessary.

14.5.6 Establishment of Procedures

1. Establish an agreed upon protocol for communications with local emergency/medical services. Agree with these services the scope of services that will be provided, the procedure for patient in-take (where relevant) and any costs or payments that may be involved.
2. Establish a procedure for what should be done if any worker who falls ill with COVID-19 dies. While normal project procedures will continue to apply, COVID-19 may raise other issues because of the infectious nature of the disease. The project should liaise with the relevant local authorities to coordinate what should be done, including any reporting or other requirements under national law.

14.5.7 Instances or Spread of COVID-19

The WHO provides detailed advice on what should be done to treat a person who becomes sick or displays symptoms that could be associated with the COVID-19 virus (for further information see WHO interim guidance on infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected). The project should set out risk-based procedures to be followed, with differentiated approaches based on case severity (mild, moderate, severe, critical) and risk factors (such as age, hypertension, diabetes) (for further information see WHO interim guidance on operational considerations for case management of COVID-19 in health facility and community). These may include the following:

1. If a worker has symptoms of COVID-19 (e.g., fever, dry cough, fatigue) the worker should be removed immediately from work activities and isolated on site.
2. If testing is available on site, the worker should be tested on site. If a test is not available at site, the worker should be transported to the local health facilities to be tested (if testing is available).
3. If the test is positive for COVID-19 or no testing is available, the worker should continue to be isolated.
4. Extensive cleaning procedures with high-alcohol content disinfectant should be undertaken in the area where the worker was present, prior to any further work being undertaken in that area. Tools used by the worker should be cleaned using disinfectant and PPE disposed of.
5. Co-workers (i.e., workers with whom the sick worker was in close contact) should be required to stop work, and be required to quarantine themselves for 14 days, even if they have no symptoms.
6. Family and other close contacts of the worker should be required to quarantine themselves for 14 days, even if they have no symptoms.
7. If a case of COVID-19 is confirmed in a worker on the site, visitors should be restricted from entering the site (this includes staff and other users of the site) and worker groups should be isolated from each other as much as possible.
8. If workers live with a family member who has a confirmed or suspected case of COVID-19, the worker should quarantine themselves and not be allowed on the project site for 14 days, even if they have no symptoms.
9. Workers should continue to be paid throughout periods of illness, isolation or quarantine, or if they are required to stop work, in accordance with national law.
10. Medical care (whether on site or in a local hospital or clinic) required by a worker should be paid for by the employer.

14.5.8 Training and Communication with Workers

Workers need to be provided with regular opportunities to understand their situation, and how they can best protect themselves, their families and the community. They should be made aware of the procedures that have been put in place by the sub-project, and their own responsibilities in implementing them.

1. There should be regular information to and engagement of workers. They should be given every opportunity to ask questions, express their concerns and make suggestions

2. Training of workers should be conducted regularly, as discussed in the sections above, providing workers with a clear understanding of how they are expected to behave and carry out their work duties.
3. Training should address issues of discrimination or prejudice if a worker becomes ill and provide an understanding of the trajectory of the virus, where workers return to work.
4. Training should cover all issues that would normally be required on the work site, including use of safety procedures, use of construction PPE, occupational health and safety issues, and code of conduct, taking into account that work practices may have been adjusted.
5. Communications should be clear, based on fact and designed to be easily understood by workers, for example by displaying posters on handwashing and social distancing, and what to do if a worker displays symptoms.

14.5.9 Communication and Contact with Staff and Other Users of Sub-Project Work Site

Relations with the staff and other users of the sub-project work sites should be carefully managed to ensure the safety of all.

1. The users of the sub-project work sites should be made aware of all of the procedures established to address the transmission of COVID-19. This should include any measures to limit or prohibit the contact between workers and sub-project site users, entry and exit procedures, worker training and the procedures to be followed if a worker becomes ill.
2. Any contractor worker who has to interact with other users of the work site, should practice adequate physical distancing, proper hand hygiene, wear proper PPE along with following other WHO and national COVID-19 transmission prevention protocols.

15 Annex 4- Waste Management Plan

This section presents the Waste Management Plan (WMP) for the project. The WMP is based on ESS1 and ESS3 and it addresses the management of both hazardous and non-hazardous waste as a result of project activities. It establishes the specific procedures related to waste management which will be implemented throughout all project phases. The WMP has been developed in accordance with international best practices in order to avoid the deterioration of the natural environment and negative impacts on the health and safety of project stakeholders. Since the project will include the Electrical and Electronic Equipment (EEE), this WMP gives special consideration to the management of EEE waste.

15.1 Objective

The Waste Management Plan provides a framework for the safe efficient and environmentally sound management of waste produced by the project in compliance with both national and international requirements that govern waste management. The plan contains operational provisions for waste management, including clear steps and budgetary provisions so as to monitor overall performance in the management of waste.

15.1.1 Legal Framework

The legal framework will support the bases of the WMP in each one of the project implementation locations, and this will be based in the local legislature, regulations, resolutions, norms, international treaties, and other legally binding instruments that apply to the project nature.

For the specifics of this Plan and in view of its applicability within participant countries of the Caribbean Sea, the following chapter will only include those regulations that are most important to this region, including applicable International Treaties and Conventions. Each participant country will adjust the content of the legal framework of the WMP to their local legal/applicable mandates and regulations.

Those International Treaties that are binging with the WMP are The Protocol Concerning Pollution from Land Based Sources and Activities to the Convention for the Protection and Development of the Marine Environment of the Wider Caribbean Region (under the Cartagena Convention), and the Programme of Action for the Sustainable Development for Small Island Development States.

Also, as part of international bindings and responsibilities for achieving sustainable development the following International Agencies: United Nations Environmental Program (UNEP), Organization of Eastern Caribbean States (OECS), Caribbean Public Health Agency (CARPHA), Caribbean Alliance for Sustainable Tourism (CAST), can be an approached for support in establishing sound practices towards an WMP.

15.1.2 Institutional Framework

This includes the institutions involved in the project administration, management, and operations. These will be identified, and their roles and responsibilities will be defined during the project phases (pre-construction, construction, operation, and closure).

15.1.3 Types of Waste

Table 15.1. outlines some of the potential waste streams that may be generated during the retrofitting and equipment upgrade activities. This list is not exhaustive and will be updated during project implementation to better reflect the actual waste streams to be handled by the project.

Table 15.1- Potential project waste streams

Project Activity	Potential Waste Generated
Retrofitting of office buildings	Asbestos Wood /Cement dust Old Wiring Electrical sockets and switches Paint tins Paint brushes and rollers
Equipment upgrades	Obsolete equipment Computers Keyboards Cables Monitors Batteries Wooden crates Pallets Styrofoam Plastic Paper Other packaging material

15.1.4 General Waste Management Procedures

The practices for the management of both hazardous and non-hazardous waste are presented in the following sections. These include both procedures and operational controls which are deemed necessary for the waste prevention, reuse and recycle and also the handling, storage, transportation, treatment and final disposal of waste.

15.1.4.1 Waste Prevention

Sub-project activities which will generate waste should strictly monitor and manage the purchasing of materials to ensure that wastage is minimal. The focus being to prevent raw materials from becoming waste. Additionally, activities should also try to avoid, as best as possible, the generation of hazardous waste and the use of hazardous materials. Where the use of hazardous materials is unavoidable, every effort must be made to identify replacement materials that are non-hazardous. The sub-project activities should try as much as is possible to avoid retrofitting and equipment upgrade activities in locations where hazardous waste (e.g., asbestos are present).

15.1.4.2 Recycle and Reuse

In addition to waste prevention strategies, the project should also implement measures to reuse and recycle materials (except hazardous materials) in order to prevent them from becoming waste. To do this, they can do the following:

1. Identify materials/products that can be reused in the retrofitting and equipment upgrades.
2. Identify external markets for the recycling of materials/products that can't be reused by the project.
3. Donate materials/products that cannot be reused for free.
4. Establish procedures that encourage recycling/reuse or materials/products.
5. Provide training to project workers on reuse and recycling.

15.1.4.3 Waste Handling

The project will ensure that any contractors responsible for the handling, treatment and disposal of both hazardous and non-hazardous waste are reputable and legitimate and licensed by the relevant licensing authority in each of the project implementing countries. Contractors must ensure that the relevant PPE is worn at all times by workers when handling waste material. Appropriate quantities of waste handling PPE should always be available.

15.1.4.4 Waste Storage

Garbage skips/dumpsters and other appropriate bins will be used to store non-hazardous waste. Hazardous waste will be stored in marked, leak-proof containers, away from regular waste to prevent spillage and/or leaching. Hazardous waste storage areas will be clearly demarcated. These locations should be clearly identified on a site map. Hazardous waste will be prohibited from being stored in containers that are designated from being stored in areas/containers that are designated for non-hazardous waste. Access to hazardous waste storage areas will only be Drums or containers that store liquid waste (e.g., leftover paint after retrofitting) should not be filled more than 80%. Liquid wastes should also have secondary containment to prevent them from escaping into the environment. For any volatile or hazardous waste, adequate ventilation should be provided. Additionally, waste should be stored in a manner that:

1. Prevents contact between wastes that may be incompatible
2. Allows for inspections between containers to monitor for any leaks, spills or overflow.

The on-site contractor should assign an officer who will be responsible for performing periodic inspections of the waste storage areas.

15.1.4.5 Transportation of Waste

On-site and off-site transportation of waste should be conducted so as to prevent or minimize spills, releases and exposure to workers and other project stakeholders. Contractors who are responsible for

off-site disposal should ensure that all vehicles are secured, not leaking and properly loaded. The on-site contractor should monitor to ensure that this occurs. Off-site waste disposal contractor should immediately be notified if there are any spills or releases originating from their vehicles and they should immediately rectify the situation. These incidents should be noted and assessed as part of the contractor's performance review. The on-site manager should be immediately made aware of any contractor issues/non-conformities.

15.1.4.6 Treatment and Final Disposal

After it has been determined that material cannot be reused or recycled in any way, the material will be disposed. Disposal of both hazardous and non-hazardous waste materials can be done in a manner that is not harmful to human health or the environment. The management of waste should be consistent with its characteristics and the local regulations in each of the implementing countries. Waste disposal and treatment may include:

1. Chemical or physical treatment of waste to make it non-hazardous prior to final disposal
2. Treatment or disposal at designated facilities
3. Disposal of the waste at permitted landfills or other types of facilities that are authorized to handle the safe, final disposal of waste.

A waste collection cycle should be developed and utilized. The cycle should be reviewed and adjusted, as necessary, based on trends in waste generation and storage capacity.

15.1.4.7 Management of Asbestos

If asbestos is discovered during project activities, the following apply:

1. If asbestos is located on the project site, it shall be marked clearly as a hazardous material.
2. If work has already commenced, all work in the area must stop immediately.
3. An asbestos management plan must be prepared by the contractor and approved by the relevant local health and waste management authorities.
4. Where possible the asbestos and its location must be appropriately contained and sealed to minimize exposure.
5. The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust.
6. Asbestos will be handled and disposed of by skilled & experienced professionals using appropriate PPE (personal protective equipment) such as respirators and Tyvec suites.
7. If asbestos material is to be stored temporarily, the wastes should be secured within closed containments and marked appropriately.
8. Security measures must be implemented against unauthorized removal of asbestos from the site.
9. No removed asbestos will be reused.

15.1.5 E-waste Management Procedures

15.1.5.1 Waste Prevention

This should be designed and operated to prevent, reduce or minimize, the quantity of e-waste generated and hazards associated with the e-waste generated in accordance with the following strategy:

1. Substituting raw materials or parts with less hazardous or toxic materials, or with those where processing generates a lower e-waste volume.
2. Adopting and implementing good housekeeping and operating practices, including inventory control to reduce the amount of e-waste resulting from materials that are out-of-date, off-specification, contaminated, damaged, or are an excess to operational needs.
3. Reducing/minimizing hazardous e-waste generation by implementing stringent e-waste segregation to prevent the commingling of non-hazardous and hazardous e-waste from be managed.

15.1.5.2 Recycle and Reuse

In addition to the implementation of e-waste prevention strategies, the total amount of e-waste may be significantly reduced through the implementation of reuse and recycling plans, which should consider the following elements:

1. Identification and reuse/recycling of products that can be reintroduced into the operational processes
2. Investigation of external markets for recycling by other industrial processing operations located in the neighbourhood or region of the facility (e.g., e-waste exchange).
3. Donating items which cannot be reused or recycled by the project for free.
4. Establishing reuse/recycling objectives and formal tracking of e-waste generation and recycling rates.
5. Providing training and incentives to employees in order to meet objectives.

15.1.5.3 Treatment and Disposal

If e-waste materials are still generated after the implementation of feasible e-waste prevention, reduction, reuse, recovery, and recycling measures; then, e-waste materials should be treated and disposed of following all measures to avoid potential impacts to human health and the environment. Selected management approaches should be consistent with the specifications of e-waste characteristics and local regulations, and may include one or more of the following:

1. On-site or off-site chemical, or physical treatment of the e-waste material to render it non-hazardous prior to final disposal.
2. Treatment or disposal at permitted facilities specially designed to receive the e-waste.
3. Permitted and operated landfills or incinerators designed for the respective type of e-waste or other methods known to be effective in the safe, final disposal of e-waste materials.

15.1.5.4 Hazardous E-Waste Management

Hazardous e-waste should always be segregated from non-hazardous e-wastes. If the generation of hazardous e-waste cannot be prevented through the implementation of the above general e-waste management practices, its management should focus on the prevention of harm to health, safety, and the environment, according to the following additional principles:

1. Understanding potential risks and impacts associated with the management of any generated hazardous e-waste during its complete life cycle.
2. Ensuring that contractors handling, treating, and disposing of hazardous e-waste are reputable and legitimate enterprises, licensed by the relevant regulatory agencies and following good international industry practice for the e-waste being handled.
3. Ensuring compliance with applicable local and international regulations.

15.1.5.5 Hazardous E-Waste Storage

Hazardous e-waste should be properly stored to prevent or control accidental releases to air, soil, and water resources in areas where:

1. E-waste is stored in a manner that prevents the commingling or contact between incompatible e-waste, and allows for inspection between containers to monitor leaks or spills. Examples include sufficient space between incompatible or physical separation such as walls or containment curbs.
2. Store in closed containers (some could be radioactive proofed), away from direct sunlight, wind and rain
3. Secondary containment systems should be constructed with materials appropriate for the e-waste being contained and adequate to prevent loss to the environment
4. Provision of readily available information on compatibility to employees, including labelling each container to identify its contents
5. Limiting access to hazardous e-waste storage areas to only employees who have received proper training
6. Clearly identifying (labelling) and demarcating the area, including documentation of its location on a facility map or site plan
7. Conducting periodic inspections of e-waste storage areas and documenting the findings.

15.1.5.6 Transportation of E-Waste

All e-waste containers designated for off-site shipment should be secured and labelled with the contents and associated hazards. This must be properly loaded and secured into transportation vehicles before leaving the site and must be accompanied by a shipping paper (i.e., manifest, record, etc.) that describes the load and its associated hazards, and which is consistent with the Transport of Hazardous Materials good practices and guidance.

15.1.5.7 Treatment and Disposal

In addition to the recommendations for treatment and disposal applicable to general waste, the following issues specific to hazardous e-wastes should be considered:

1. Commercial or Government E-waste Contractors in the absence of qualified commercial or government-owned e-waste vendors (taking into consideration the proximity and transportation requirements), facilities generating e-waste should consider using: ·
2. Have the technical capability to manage the e-waste in a manner that reduces immediate and future impact to the environment, and have all required permits, certifications, and approvals, of applicable government authorities.
3. Have been secured through the use of formal procurement agreements In the absence of qualified commercial or government-owned e-waste disposal operators (taking into consideration proximity and transportation requirements), project sponsors should consider using:
    a. Installing on-site e-waste treatment or recycling processes
    b. As a final option, constructing facilities that will provide for the environmental sound long-term storage of e-waste on-site or at an appropriate alternative location up until external commercial options become available.

15.1.5.8 Small Quantities of Hazardous E-Waste

Hazardous e-waste materials are frequently generated in small quantities by many projects through a variety of activities such as equipment and building maintenance activities. Examples of these types of e-wastes include used batteries (such as nickel-cadmium or lead-acid); and lighting equipment, such as lamps or lamp ballasts, servers, computers, cables, etc. These types of e-waste should be managed, following the guidance provided in the above sections.

15.1.6 Monitoring and Reporting

This section outlines the monitoring activities associated with the management of both hazardous and non-hazardous waste (including e-waste).

15.1.6.1 Inspections

Regular waste inspections should be undertaken to identify any waste that might be inappropriately stored and to prevent any potential spills or other accidents before they occur. The inspections should ensure that the waste is properly labelled and stored. The waste storage area and receptacles should also be inspected for any crack, corrosion, damage to equipment or floors. Additionally, it should be confirmed that any emergency systems are operable. The on-site contractor will designate a worker to conduct these inspections.

The on-site contractor should develop and maintain a written inspection schedule and ensure that the personnel designated follows said schedule. The schedule should include:

1. The type of inspection to be conducted (visual or any other method that may be deemed necessary).
2. The inspection methods to be used.
3. The frequency of inspections.
4. The area(s) to be inspected.
5. Plan of action outlining any preventative measures to address potential problems.

If needed, additional inspections will be conducted after extraordinary site-specific circumstances such as storms or any other extreme weather conditions. Random spot inspections should also be conducted once a month where practical.

15.1.6.2 Inspection Procedures

Staff conducting inspections should look for the following:

1. Malfunctioning or deteriorating equipment, such as broken or corroded skips/dumpsters or other waste storage containers.
2. Discharges or leaks from any of the storage containers.
3. Inappropriate waste i.e., hazardous wastes, liquids, etc. stored in areas designated for general non-hazardous solid waste or in inappropriate containers.
4. Operator errors.
5. Proper labelling.
6. Proper storage.

During an inspection the following procedures should be implemented when inappropriate wastes are found:

1. Segregate the suspicious waste.
2. Use appropriate personal protective equipment
3. Contact the relevant personnel that generated the waste to find out more about it.
4. Dispose appropriately.

Inspections should be recorded in a log (see template in Appendix 1) containing the following information: i. Date of Inspection ii. Name of Inspector iii. Conditions found iv. Recommended Corrective Actions Inspection personnel should be familiar with the inspection log to identify any malfunctions or deficiencies that remain uncorrected from previous inspections.

15.1.6.3 Monitoring Records- Hazardous General Waste

Monitoring records for hazardous waste collected and stored should include:

1. Name and identification number of the material(s) composing the hazardous waste.
2. Physical state (i.e. solid, liquid, gaseous or a combination of one or more of these).

3. Quantity (in kilograms or litres).
4. Number of containers.
5. Origin.
6. Date of storing.

15.1.6.4 Monitoring Records- Hazardous E-Waste

Monitoring records for hazardous e-waste collected, stored, or shipped should include:

1. Name and identification number of the material(s) composing the hazardous e-waste;
2. Physical state;
3. Quantity (i.e., kilograms, number of containers);
4. E-waste shipment tracking documentation to include, quantity and type, date dispatched, date transported and date received, a record of the originator, the receiver and the transporter;
5. Method and date of storing, repacking, treating, or disposing at the facility, cross-referenced to specific manifest document numbers applicable to the hazardous e-waste; and
6. Location of each hazardous e-waste within the facility, and the quantity at each location.

15.1.6.5 Audits

Periodic auditing of third-party treatment, and disposal services including re-use and recycling facilities when significant quantities of hazardous waste (including e-waste) are managed by third parties. Whenever possible, audits should include site visits to the treatment storage and disposal location. In the event that waste (on-site storage and/or pre-treatment and disposal) is in direct contact with soil, additional procedures must be performed to ensure regular monitoring of soil quality.

15.1.7 Budget

In each phase of the project must require a budget with associated costs of the development and implementation of WMP. The budget must consider all management activities, as well as potential procurement of equipment, including personal protective equipment. These budgets to be prepared in charts showing cost estimations categorized for each management activity presented must also include those contingency expenditures and expending charted chronograms. The budget will be itemized and should include all financial considerations that are being adopted for the general implementation of all project activities.

15.1.8 Appendix 1- Waste Storage Area Inspection Checklist

Inspector Name:	
Date:	
Time:	
Location of Inspection:	
Total # of Containers Inspected:	

Inspection Item	**Yes**	**No**	**Comments**
Containers Marked/ Labelled Properly			
Labels Legible			
Appropriate Containers for Type of Waste			
Containers stored upright			
Waste Separated/ Segregated Correctly			
Containers Observed to be free of Leaks / Staining (i.e., not overfilled)			
Containers Observed with Closed Tops (where applicable)			
Containers Observed without Dents or Corrosion			
Appropriate Aisle Space Maintained			
Containment System free of Cracks, Water or Other Liquids (where applicable)			
Area Free of Debris and Other Materials			
Area Free of Spills or Leaks			
Proper Signage, Waste Procedures Posted			
Emergency Response Equipment in Proper Working Order			

Corrective Action Required/Completed

Reviewed by: _____

Date: _____

Annex 5-Screening Procedures and Associated Forms

Form A. Sub Projects Screening Procedures

Section A: General Information

Name of Subproject	
Location of Subproject	
Country	
Contractor Information	**Name:**
	Address:
	Telephone number:
	Email address:
Information for Person responsible for screening process and completing form	**Name:**
	Profession:
	Telephone number:
	Email address:
	Signature and Date:

Section B. Environmental and Social Description and preliminary assessment of situation and those potential environmental and social impacts

Description of Project site location: include coordinates and maps

_____
_____
_____

Description of the social surroundings and settings within the buildings

_____
_____
_____

1. Pollution and Contamination Risks

Description	Yes	No	Not known
Is there a possibility of pollution or contamination risks by discharges from latrines, industrial and dump sites, etc.?			

2. Geology

Description	Yes	No	Not Known
Is there a possibility of soil instability and erosion?			
Is there a possibility of saltwater intrusion?			
Is there a possibility of flooding or interrupting natural drainages and or surface runoff?			

3. Soil Erosion

Description	Yes	No	Not Known
Could the Project activities affect soil erosion processes			
Could the Project activities create indirect activities that could promote soil erosion processes?			
Will the Project modify slopes?			
Could the Project activities create processes that could modify slopes?			

In the event the project activities promote or creates activities that could lead to install infrastructures or activities in areas with slopes. In those instable slopes is there a probability for danger?			
Would it there be a need for consultation of a geology expert?			

4. Water: Quality and Quantity

Description	Yes	No	Not Known
Is there any Surface waters or runoff evidence nearby the project implementation site?			
Will the Project increase the use and demand of freshwater resources?			
Will the Project generate or discharge waste liquid substances into natural surface waters, swamps or palustrine habitats?			
Would the project produce negative impacts on the nearby surface waters?			
Would it there be a need for consultation of a water expert?			

5. Groundwaters: Quality and Quantity

Description	Yes	No	Not known
Is there an exploitable groundwater resource by the project?			
Will the Project increase the groundwater uses?			
Will the Project discharge waste waters or any other liquid wastes unto the ground waters and aquifer?			
Could the Project deteriorate or alter the groundwaters?			
Would it there be a need for consultation of a hydrological expert?			

6. Energy Source

Description	Yes	No	Not Known
Will the project increase the demand for energy consumption?			
Will the project create a demand for a different source of energy?			
Will the Project create a demand for different type of energy sources? if yes define type:			

7. Uses of Natural Resources

Description	Yes	No	Not Known
Would the Project require and use considerable quantities of natural resources? (i.e., construction materials, water, soils, sand, gravels)			

8. Maintenance and Upgrades

Description	Yes	No	Not known
Will the Project need frequent maintenance and upgrades during its operation?			

9. Labor

Description	Yes	No	Not known
Will the Project increase employment in the zone?			
Will the Project eliminate job opportunities in the zone?			
Will the project increase income and means of sustenance?			
Will the project diminish income and means of sustenance?			

10. Population: Risks and Impacts

Description	Yes	No	Not known
Would the adverse and negative risks and impacts will be evenly distributed amongst the area of influence of the project			

Part C: Conclusion/ Next actions

Summary	More Requirements/Next action
If all answers were NO	No actions needed
If there at least one YES	Proceed to a Simple Environmental and Social Revision (Form C); or a Limited Environmental and Social Revision (Form D) For Projects that include infrastructures activities, complete Form B: List of Environmental and Social Verification

Recommended Actions:

- No actions are recommended if there are no impacts identified. Only a Simple Environmental Review (SER), will be performed if there are easily mitigable impacts that could potentially create low level affectation
- Limited Environmental Revision (LER) would be required if the subproject could create minor and low-level impacts, that could be avoided by changing in the project design and engineering
- Any other recommendation (please explain)

This form has been completed by:	Approved by the Project Coordinator
Name: _____	Name: _____
Title: _____	Title: _____

Date: _____ Signed: _____	Date: _____ Signed: _____

Form B *[to be further completed]*

Verification List of actions for infrastructure projects

Phase	Negative Potential Environmental Impact	Relevant	Mitigation Measures recommended	Relevant	Responsible
Pre-construction					
During construction	Noise		Use of noise reduction gears Limit works to scheduled hours		
	Particular matter (PM)		Dust control Cleaning and storing at closing work schedule at sites		
Post construction	Tools and Working material		Removed daily from work areas		

This form has been completed by:	Approved by the Project Coordinator
Name: _____	Name: _____
Title: _____	Title: _____

Date: _____ Signed: _____	Date: _____ Signed: _____

Form C

Simple Environmental and Social Assessment Process and Checklist (SEA)

Expected Impacts	**Impact Description**	**Proposed Mitigation Measures (specific plans included)**
Physical Media		
Increased soil erosion		
Potential water pollution and/or contamination (surface waters, groundwaters, marine waters)		
Dust and noise generated during construction activities		
Biological/Environment		
Social		
Violent population and communities		
Risk to human's health and Environs by transport of dangerous or toxic materials and substances		

This form has been completed by:	Approved by the Project Coordinator
Name: _____	Name: _____
Title: _____	Title: _____
Date: _____	Date: _____
Signed: _____	Signed: _____

Form D

Limited Environmental and Social Assessment

Name of Subproject	
Subproject type:	
Location:	
Country:	

General description of the subproject

Subproject objectives

_____
_____
_____

Subproject components

_____
_____
_____

Base line description of the subproject affected areas and environs

Physical Settings description

_____
_____
_____

Social and economic description

_____
_____
_____

Identification of Negative Environmental Impacts

Impacts in the Physical surroundings

_____
_____
_____

Impacts in the Social and Economical setting

_____
_____
_____

Mitigation Measures

Impact description

_____
_____
_____

Mitigation Measures Description

_____
_____
_____

This form has been completed by: Name: _____	Approved by the Project Coordinator Name: _____

Title: _____ Date: _____ Signed: _____	Title: _____ Date: _____ Signed: _____

Annex 6- Grievance Information Form

Date/Time received:	**Date: (dd-mm-yyyy)** **Time:** □ **am** □ **pm**	
Name of Complainant:		□ You can use my name, but do not use it in public. □ You can use my name when talking about this concern in public. □ You cannot use my name at all.
Company (if applicable)		□ You can use my company name, but do not use it in public. □ You can use my company name when talking about this concern in public. □ You cannot use my company name at all
Contact Information:	**Phone:** **Email address:** **Address:** (Kindly indicate the preferred method of communication)	
Details of grievance: (Who, what, when, where)	□ One-time incident/complaint □ Happened more than once (indicate how many times): _____ □ Ongoing (a currently existing problem)	

How would you like to see issue resolved?	
Attachments to the grievance/complaint: (e.g. pictures, reports etc.)	List here:

Annex 7- Grievance Acknowledgement Form

The project acknowledges receipt of your complaint and will contact you within ten (10) working days.

Date of grievance/complaint: (dd/mm/yyyy)	
Name of Grievant/Complainant:	
Complainant's Address and Contact Information:	
Summary of Grievance/Complaint: (Who, what, when, where)	
Name of Project Staff Acknowledging Grievance:	
Signature:	
Date: (dd/mm/yyyy)	

Annex 8- Grievance Log

No.	Name of Grievant/Complainant	Date Received	Grievance Description	Name of Grievant Owner	Requires Further Intervention	Action(s) to be taken by PIU	Resolution Accepted or Not Accepted and Date of Acceptance/Non-acceptance
1.							
2.							
3.							
4.							

Annex 9- Meeting Record Form

Date of the Meeting: ……. **Grievance No:** …….

Venue of meeting: …….

Details of Participants:

Complainant	Project/Government/OECS

Summary of Grievance……….

……

……

……

Meeting Notes: …….

……

……

……

Decisions taken in the meeting / Recommendations of GRC……

……

……

……

Issue Resolved / Unresolved: ……..

Signature of Chairperson of the meeting: ……

Name of Chairperson: …… Date (DD/MM/YYYY): ……

Annex 10- Disclosure/Release Form

Result of Grievance Redressal

Grievance No:	
Name of Grievant/Complainant:	
Date of Complaint:	
Summary of Complaint:	
Summary of Resolution:	
Resolved at:	□ First Level □ Second Level □ Third Level
Date of grievance resolution (DD/MM/YYYY):	

Signature of Complainant in acceptance of the suggested grievance resolution:

……

Name: ……

ID number: ……. **Type of ID:** …….

Date (DD/MM/YYYY): ……

Signature of Environmental and Social Development Specialist and Project Coordinator:

1……. 2……

1.Name:…….

Place:……..

Date:(dd –mm – yyyy): ……..

2.Name:……..

Place:……..

Date:(dd –mm – yyyy): ……