Caribbean Resilient Renewable Energy Infrastructure Investment Facility (P180831)

Environmental and Social Management Framework (ESMF)

DRAFT

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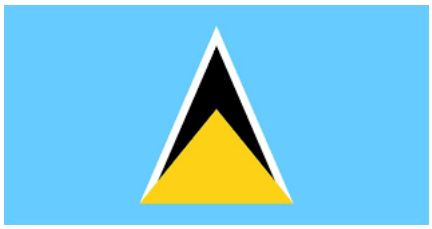
Government of Grenada

Ministry of Climate Resilience, the Environment and Renewable Energy

Government of Saint Lucia

Ministry of Infrastructure, Ports, Transport, Physical Development and Urban Renewal



Government of Saint Vincent and the Grenadines

Ministry of Urban Development, Energy, Seaports, Grenadines Affairs and Local Government

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Abbreviations

CERC	Contingency Emergency Response Component
C-ESMP	Contractor's ESMP
DRE	Distributed renewable energy
DPV	Distributed Photovoltaic
ESCOP	Environmental and Social Codes of Practice
EE	Energy efficiency
E&S	Environmental and social
E&S Specialists	Environmental Specialist and Social Specialist
EHS	Environmental, Health and Safety
ESHS	Environmental, social, health and safety
EIA	Environmental impact assessment
ESA	Electricity Supply Act
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESSs	Environmental and Social Standards
DIPT	Department of Infrastructure, Ports and Transport (Saint Lucia)
GHG	Greenhouse gas
GIIP	Good international industry practice
GRENLEC	The Grenada Electricity Services Ltd.
IPF	Investment Project Financing
IPF DDO	Investment Project Financing with a Deferred Drawdown Option
LED	Light-emitting diode
LUCELEC	Saint Lucia Electricity Services Limited
MCRERE	Ministry of Climate Resilience, the Environment and Renewable Energy (Grenada)
NCCs	National Coordination Committees
NDC	Nationally Determined Contributions
OECS	Organization of Eastern Caribbean States
PAI	Project Area of Influence
PAP	Project-affected party
PDO	Project Development Objective
PPE	Personal Protective Equipment
PIU	Project Implementation Unit
POM	Project Operational Manual
PPA	power purchase agreements
PPP	public private partnership
PURC	Public Utilities Regulatory Commission (Grenada)
PV	Photovoltaic
RAP	Resettlement Action Plan
RCA	Root Cause Analysis
RCU	Regional Coordination Unit
RE	Renewable energy
RREIIF	Resilient Renewable Energy Infrastructure Investment Facility
RFP	Request for proposals
RSC	Regional Steering Committee
SEA/SH	Sexual exploitation and abuse/sexual harassment
SEP	Stakeholder Engagement Plan
SIDS	Small Island Developing States
SoP	Series of Projects
TA	Technical Assistance
T&D	Transmission and distribution
ToR	Terms of Reference
WB	World Bank

Executive Summary

The economies of the countries in the Caribbean region limit options for offsetting the high cost of dependence on imported fossil fuels**.** Countries of the region do not benefit from economic diversification, varied composition of international trade, and economies of scale that can help larger countries deal with high energy costs. Additionally, some countries in the Caribbean Region are highly vulnerable to extreme weather events and climate change, which has taken a massive toll on their economies in recent years. Located in the Atlantic hurricane belt, the region is exposed to recurrent extreme weather events such as hurricanes, floods, and rising sea levels as well as subject to substantial seismic activities and associated risks such as earthquakes and volcanic eruptions. Disasters due to severe weather are estimated to have cost the Eastern Caribbean countries an average of 3.6 percent of Gross Domestic Product (GDP) between 1997 and 2016, well above the average for small states.

Caribbean countries have already made substantial strides in regional integration to overcome shared challenges but much more is required to implement the regional clean-energy transition. While regional structures are in place to address common development problems of countries in the Organisation of Eastern Caribbean States (OECS), there are multiple barriers to developing the utility-scale RE projects necessary to reduce high dependence on costly imported fuel for diesel-fired power plants and meet targets for a clean-energy transition. Caribbean countries are committed to establishing policies and regulatory frameworks to meet their National Determined Contribution (NDC) targets, but progress could be faster. International Development Association (IDA) member countries in the OECS remain committed to their NDC targets, with a long-term strategy towards a clean energy transition. However, despite these plans, results in reducing GHG have been insignificant in the Caribbean Region so far due to: (i) the lack of consistent and effective implementation by the government agencies, (ii) regulatory frameworks not yet fully functional in support of the clean-energy transition, and (iii) inadequate financial incentives as well as integration capacity of national utilities to support new RE investments.

The Resilient Renewable Energy Infrastructure Investment Facility (RREIIF) Project is designed as a regional program with a goal of creating an enabling environment for renewable energy and attracting major companies and investors into small island nations. This will encourage the development of interest and momentum in the countries to implement the necessary policies and infrastructure to fully benefit from regional developments. RREIIF's approach of aggregating capacity needs across member countries will create a significant enough demand for leading private players interested in deploying renewable energy projects in these countries.

The Project Development Objective is to increase the share of utility-scale renewable energy generation and private-sector participation in renewable energy development in the participating Caribbean countries.

The Project consists of four components that aim to address common regional barriers to RE development in the Caribbean countries. Across all components, measures to strengthen resilience have been integrated given the vulnerability of these countries to climate and natural disaster risks. The lending instrument for the proposed project is Investment Project Financing (IPF). The total project cost is estimated at US$118.74 million.

This Environmental and Social Management Framework (ESMF) is developed to support the environment and social due diligence provisions for activities financed by the Project. This ESMF specifically addresses

the environmental and social risks related to Project components that will be implemented by the national PIUs of each participating country (Component 3 and 4 of the Project).

This ESMF follows the World Bank's Environmental and Social Framework (ESF) as well as the respective national laws and regulations of Grenada, Saint Lucia and Saint Vincent and the Grenadines. The objective of the ESMF is to assess and mitigate potential negative environment and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements. More specifically the ESMF aims to:

(i) assess the potential environmental and social risks and impacts of the proposed Project and propose mitigation measures;
(ii) establish procedures for the environmental and social screening, review, approval, and implementation of activities;
(iii) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities;
(iv) identify the training and capacity building needed to successfully implement the provisions of the ESMF;
(v) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and
(vi) establish the budget requirements for implementation of the ESMF.

Potential environmental and social risks for project activities are related to, among others:

- Occupational health and safety risks
- Generation, management, and disposal of hazardous and non-hazardous waste
- Construction-related dust generation, vibration, noise, and odour

Project risks will be managed and mitigated through the preparation and application of various environmental and social (E&S) documents. Sub-projects with low risks will entail the application of Environmental and Social Codes of Practice (ESCOPs) while those with moderate and substantial risks will entail the preparation of an Environmental and Social Management Plan (ESMP), and subsequently a contractor's ESMP (C-ESMP). The ESMP may also require the preparation of other associated plans such as the community health and safety plan; waste management plan; and traffic management plan, resettlement plan, and cultural heritage plan. Sub-projects rated with high risks will be excluded from the project.

A Project Manager will be responsible for ensuring the delivery of all project activities, including ensuring quality assurance and providing no objections to E&S documents. Each PIU will also have an Environmental Specialist and a Social Specialist who will be responsible for ensuring that the ESMF is implemented in compliance with national legislation and the requirements of the WB's ESSs. This includes overseeing overall implementation and monitoring of environmental and social mitigation activities; providing support, oversight and quality control to contractors and field staff working on environmental and social risk management; and reporting on E&S implementation progress. Community Liaison Officers (CLOs) will be responsible for conducting, documenting, and following up on consultations held at the sub-project level as well as tracking grievances and beneficiary feedback to monitor implementation of project activities and environmental and social mitigation measures.

Through stipulation in their contracts, contractors will comply with all the project's E&S risk management plans and procedures and national legislation. Contractors will take all necessary measures to protect the

health and safety of workers and community members, and avoid, minimize, or mitigate any environmental harm resulting from project activities. Contractors will also create awareness within their workforce of environmental and social E&S risk management compliance for their effective implementation.

This ESMF should be read together with other plans prepared for the Project, including the Stakeholder Engagement Plan (SEP) (Grenada, Saint Lucia, Saint Vincent and the Grenadines), the Labor Management Procedures (LMP) (Annex 5) and the Environmental and Social Commitment Plan (ESCP).

Introduction

The economies of the countries in the Caribbean region limit options for offsetting the high cost of dependence on imported fossil fuels**.** Countries of the region do not benefit from economic diversification, varied composition of international trade, and economies of scale that can help larger countries deal with high energy costs. Additionally, some countries in the Caribbean Region are highly vulnerable to extreme weather events and climate change, which has taken a massive toll on their economies in recent years. Located in the Atlantic hurricane belt, the region is exposed to recurrent extreme weather events such as hurricanes, floods, and rising sea levels as well as subject to substantial seismic activities and associated risks such as earthquakes and volcanic eruptions. Disasters due to severe weather are estimated to have cost the Eastern Caribbean countries an average of 3.6 percent of Gross Domestic Product (GDP) between 1997 and 2016, well above the average for small states.

Caribbean countries have already made substantial strides in regional integration to overcome shared challenges but much more is required to implement the regional clean-energy transition. While regional structures are in place to address common development problems of countries in the Organisation of Eastern Caribbean States (OECS), there are multiple barriers to developing the utility-scale RE projects necessary to reduce high dependence on costly imported fuel for diesel-fired power plants and meet targets for a clean-energy transition. Caribbean countries are committed to establishing policies and regulatory frameworks to meet their National Determined Contribution (NDC) targets, but progress could be faster. International Development Association (IDA) member countries in the OECS remain committed to their NDC targets, with a long-term strategy towards a clean energy transition. However, despite these plans, results in reducing GHG have been insignificant in the Caribbean Region so far due to: (i) the lack of consistent and effective implementation by the government agencies, (ii) regulatory frameworks not yet fully functional in support of the clean-energy transition, and (iii) inadequate financial incentives as well as integration capacity of national utilities to support new RE investments.

The Caribbean Resilient Renewable Energy Infrastructure Investment Facility (RREIIF) Project provides countries access to regional IDA to address funding needs for more renewable energy integration investment in their grids. The regional support will allow these countries to address their barriers related to scale and leverage regional IDA support, and it will ensure that national IDA will be focused on the immediate needs of these countries in terms of social sectors and disaster management. The proposed RREIIF Project is designed for the countries in the Caribbean region to address shared and interlinked challenges in their energy sector and accelerate the decarbonization of the energy sector by mobilizing public and private sector financing for utility-scale RE projects.

The RREIFF Project is designed as a regional program with a goal of creating an enabling environment for renewable energy and attracting major companies and investors into small island nations. This will encourage the development of interest and momentum in the countries to implement the necessary policies and infrastructure to fully benefit from regional developments. RREIIF's approach of aggregating capacity needs across member countries will create a significant enough demand for leading private players interested in deploying renewable energy projects in these countries.

This Environmental and Social Management Framework (ESMF) is developed to support the environment and social due diligence provisions for activities financed by the Project and follows the World Bank's Environmental and Social Framework (ESF) as well as the respective national laws and regulations of Grenada, Saint Lucia, and Saint Vincent and the Grenadines. The objective of the ESMF is to guide the assessment and mitigation of potential negative environment and social risks and impacts of the Project

consistent with the Environmental and Social Standards (ESSs) of the World Bank's ESF and national requirements.

More specifically the ESMF aims to: (a) assess the potential environmental and social risks and impacts of the proposed Project and propose mitigation measures; (b) establish procedures for the environmental and social screening, review, approval, and implementation of activities; (c) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities; (d) identify the training and capacity building needed to successfully implement the provisions of the ESMF; (e) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) establish the budget requirements for implementation of the ESMF.

This ESMF should be read together with other plans prepared for the Project, including the Stakeholder Engagement Plan (SEP) (Grenada, Saint Lucia, Saint Vincent and the Grenadines), the Labor Management Procedures (LMP) (Annex 5) and the Environmental and Social Commitment Plan (ESCP).

Project Description, Development Objective, and Components

The Caribbean Resilient Renewable Energy Infrastructure Investment Facility (RREIIF) Project (hereafter referred to as the Project) is a regional Series of Projects (SoP) to create an enabling environment for renewable energy and attract major companies and investors into smaller island-countries. The SoP's programmatic framework is scalable, allowing countries in the region to join at different times. A regional approach will create interest and momentum in project countries to put in place the right policy and enabling infrastructure to take full advantage of regional developments. The Project's approach of aggregating capacity needs across countries will provide a large enough demand for leading private players to be interested in deploying solar energy in these countries. The first set of activities in the Project will be implemented at the regional level through a Regional Entity within the Eastern Caribbean Partial Guarantee Corporation (ECPCGC) and at the national level in Grenada, Saint Lucia, and Saint Vincent and the Grenadines.

The Project Development Objective is to increase the share of utility-scale renewable energy generation and private-sector participation in renewable energy development in the participating Caribbean countries.

The Project consists of four components that aim to address common regional barriers to RE development in the Caribbean countries. Across all components, measures to strengthen resilience have been integrated given the vulnerability of these countries to climate and natural disaster risks. **This ESMF specifically addresses the environmental and social risks related to Project components that will be implemented by the national PIUs of each participating country (Component 3 and 4 of the Project).**

Component 1: Regional RE Coordination Unit (RCU), Institutional Strengthening, and Implementation Support (Estimated US$7.50 million). This component will establish the regional entity for: (i) coordinating the aggregation of RE projects to achieve economies of scale, lowering the cost of individual projects, and (ii) providing technical support to national entities of the three participating countries, as well as to the Eastern Caribbean Partial Credit Guarantee Corporation (ECPCGC).

Subcomponent 1.1: The RCU and the Institutional Strengthening Mechanism (US$2.00 million). The RCU will be responsible for the aggregation of RE projects across the participating countries

along with national regulators. The RCU will assist national PIUs in identifying and preparing bankable RE projects and be responsible for coordinating their development, from conception to completion, regularly reporting on progress. Climate resilient considerations will be embedded in the appraisal of these projects. The staff of the RCU will consist of a multidisciplinary team of experts: energy engineers, financial and legal experts, environmental and social (E&S) specialists, etc.

Subcomponent 1.2: Technical Assistance (USD 5.50 million). This subcomponent will provide technical support to the regional and national stakeholders of the three participating countries, in the following areas: capacity-building, standardization of documentation, advisory services, technical assistance to ECPCGC, support for hiring specialized staff, coordination with and capacity building for participating banks and assistance in the development of an insurance product. Furthermore, the TA activities will support the ECCB in the design and establishment of an umbrella fund for mobilizing climate finance to support the regional green-energy transition.

Component 2: Risk Mitigation Mechanism: Equity Capital in the RREIIF Risk Mitigation Fund for Partial Credit Guarantees (Estimated Cost: USD30.00 million). The RREIIF will provide risk mitigation solutions for participating banks in the region via a new RE window with multiple product offerings implemented by the Eastern Caribbean Partial Credit Guarantee Corporation (ECPCGC). This component will address physical risks by supporting RE projects that have resilient design and by providing guarantees on impacts of physical risks on payments to IPPs.

Component 3: Renewable Energy Integration and Infrastructure Modernization, Institutional Strengthening, and National Implementation Support (Estimated Cost: US 81.24 million). This component focuses on modernizing electricity grids to support the integration of RE sources and enhance the reliability and resilience of energy infrastructure. It will finance the optimization and strengthening of transmission and distribution (T&D) networks in participating countries, preparing the grid to accommodate increased RE generation, including battery energy storage. The investment will cover works to expand the capacity of existing transmission lines, upgrade current substations, or establish new primary substations. All infrastructure design and construction will incorporate climate-resilient measures to enhance the grid's durability against climate hazards.

Subcomponent 3.1: Supply, installation of T&D lines, upgrade of substations and modernization of grid control centers in Grenada (US$21.75 million). This subcomponent focuses on modernizing electricity grids to support the integration of RE sources and enhance the reliability and resilience of energy infrastructure. This subcomponent will finance the procurement and installation of (i) T&D network reinforcements to accommodate more generation capacity, (ii) upgrading substations by increasing their capacity and or optimizing voltage levels, and (iii) modernization of existing distribution and transmission control centers and/or the construction of new ones. In the first round, the project will finance (i) the construction of two 33kV sub transmission lines of 60 kms from Queens Park to Pearls and from Grand Anse to St Davids **(**ii) the construction of 2 new 33/11kV substations with 15MVA to 20MVA transformers each, (iii) the construction of a back-up control center to the existing SCADA system. The component will also finance the implementation of Advanced Metering Infrastructure (AMI) that will include the replacement of existing electromechanical customer kWh meters with digital AMI meters with two-way communication for automatic meter reads and prepaid metering systems including the necessary equipment and software. The hard investment will represent around 85% of the total of the component.

Subcomponent 3.2: Supply, installation of T&D lines, upgrade of substations and modernization of grid control centers in Saint Lucia (US$27.34 million). This subcomponent focuses on modernizing electricity grids to support the integration of RE sources and enhance the reliability and resilience of energy infrastructure. It will finance the procurement and installation of (i) transmission and distribution network reinforcements to accommodate more generation capacity, (ii) upgrading substations by increasing their capacity and or optimizing voltage levels, and (iii) modernization of existing distribution and transmission control centers and/or the construction of new ones. Specifically, the component will finance (i) the replacement of a 66kV Gas Insulated Substation (GIS) at Castries, (ii) the construction of new transmission line from Cul de Sac to Castries; and (ii) the construction of a new substation in the north of the island. The hard investment will represent around 90% of the total of the component.

Subcomponent 3.3: Supply, installation of T&D lines, upgrade of substations and modernization of grid control centers in St. Vincent and the Grenadines (US$23.00 million). This subcomponent focuses on modernizing electricity grids to support the integration of RE sources and enhance the reliability and resilience of energy infrastructure. It will finance the procurement and installation of (i) T&D network reinforcements to accommodate more generation capacity, (ii) upgrading substations by increasing their capacity and or optimizing voltage levels, and (iii) modernization of existing distribution and transmission control centers and/or the construction of new ones.
This subcomponent will finance specifically in this phase (i) tools for operation and planning including modelling tools to build a more resilient transmission network, such as the installation of an outage management system to more efficiently restore infrastructure after natural disasters; AI-based daily projection and dispatch tool; assistance in building complete model for different island. (iii) elaboration of standards with an aim to improving resilience and training T&D Construction (iv) Supply, installation of 6MWh BESS and T&D for the BESS integration in the utility grid as well as SCADA system to monitor the renewables' dispatch.

Sub-Component 3.4: Institutional strengthening and Implementation Support to National PIUs (US$9.15 million): The subcomponent will focus on supporting the national PIUs in the implementation of the project. Each country's PIU will be responsible for managing its subcomponent. This subcomponent will help countries in the procurement of supervisory engineers, consultancy services, and the preparation of any E&S instruments that might be required; it will also help countries fund PIU staff and operations. Each country's PIU will have designated funds based on support activities that need to be carried out. The allocation across countries for this sub-component is: US$3.15 Million for Saint Lucia (*Sub-component 3.4(i)*)[1]; US$3 Million for Grenada (*Sub-component 3.4(ii)*); US$3 Million for SVG (*Sub-component 3.4(iii)).*

Component 4: Contingent Emergency Response Component (US$0). This component, known as the Contingent Emergency Response Component (CERC), will be available if needed, to redeploy some of the project resources alongside those of other projects in specific country project portfolio to respond to an emergency. The available resources will be made available to finance emergency response activities and to address crisis and emergency needs.

[1] This includes US$0.15 million financing from the CCEFCF allocation for Gender Equality for SIDs (GE-SIDS) for Saint Lucia aimed at increasing female employment in technical energy jobs and bolstering Saint Lucia's STEM capacity to support the country's transition to a decarbonized energy sector.

Project Cost and Financing: The lending instrument for the proposed project is Investment Project Financing (IPF). The total project cost is estimated at US$118.74 million.

The Project will be implemented at regional and national level by a regional coordination unit (RCU) and national implementation units at each country participants level. At the national level, the line ministries and agency responsible for the energy sector of the participating countries will be responsible for the execution of the Project, working in close collaboration with the Ministry of Finance (MoF) and other ministries in the national cabinets for their respective project sub-components. Each participating country will have a PIU that will be responsible for planning and implementing all activities in the country and reporting to the responsible line ministry.

Environmental and Social Policies, Regulations and Laws

World Bank Standards

The project will follow the World Bank ESSs. The World Bank's ESSs applicable to project activities are summarized below in Table 1.

Table 1 Relevant World Bank ESSs

E&S Standard	Relevance
ESS1 Assessment and Management of Environmental and Social Risks and Impacts	ESS1 is relevant for the project because activities under Component 3 are expected to pose environmental and social risks such as those related to (1) generation and disposal of hazardous and non- hazardous waste; (2) safe construction practices; (3) risk of forced labor in global supply chain for solar panels and solar components; (4) occupational health and safety.
ESS2 Labor and Working Conditions	ESS2 is relevant for the project because there are certain labor risks for project workers, specifically contracted workers. Labor related risks for contracted workers include occupational health and safety risks and risks of forced labor in the global supply chain for solar panels and solar components.
ESS3 Resource Efficiency and Pollution Prevention and Management	ESS3 is relevant due to risks associated with pollution including inadequate disposal of construction wastes and hazardous materials as well as improper management of construction waste, noise and air pollution.
ESS4 Community Health and Safety	ESS4 is relevant. Adverse impacts on the health and safety of surrounding communities such as the generation of hazardous and non-hazardous waste, noise, dust, transportation of construction materials and increased traffic may occur while works are being undertaken.
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	ESS5 is currently relevant. Land acquisition is not expected under the proposed sub-project sites. However, a resettlement framework (RF) is currently being prepared. If a sub-project requires land acquisition, a resettlement action plan (RAP) will be prepared and implemented.
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	ESS6 is currently relevant. As all sites are not known a precautionary approach is being taken. This ESMF includes screening criteria for sub-project selection and based on the risks identified due diligence will be carried out to ensure that project activities do not alter or cause destruction to critical or sensitive natural habitats.
ESS8 Cultural Heritage	ESS8 is currently relevant. Chance Finds Procedure (CFP) will be included in bidding documents and implemented in line with national legislation and the requirements under ESS8. Construction contracts will include clauses requiring civil contractors to take proper protective measures in case cultural heritage sites are discovered, including to stop activities if a cultural property is found during construction.
ESS9 Financial Intermediaries	ESS9 is relevant and applies to activities under Component 2, which will be implemented by the ECPCGC.

ESS10 Stakeholder Engagement and Information Disclosure	ESS10 is currently relevant for all projects given the need to engage with beneficiaries and stakeholders on development activities that affect their lives.

National Legal Frameworks

Grenada, Saint Lucia, and Saint Vincent and the Grenadines are committed to meeting their National Determined Contribution (NDC) objectives and updating the national energy policies and regulatory framework to enable a transition to a low carbon economy, reducing reliance on imported fuel and increasing energy system resilience. Grenada submitted its second NDC in November 2020, targeting a reduction of greenhouse gas (GHG) emissions at 40 percent of the 2010 level by 2030. Grenada in in the process of updating its national energy policies and implementation action plans and developed its National Green Cooling Strategies in 2020. In January 2021, Saint Lucia published its updated NDC target of a seven percent reduction of GHG relative to 2010 by 2030 in the energy sector, compared with two percent in the country's first NDC submission. Saint Lucia developed their National Green Cooling Strategies in 2020 and is in the process of updating its national energy policies and implementation action plans. SVG has submitted its Intended NDC, targeting reductions in GHG emissions, by 2025, at 22 percent of what they would be in the country's business-as-usual scenario. Investment in EE and DRE to diversify generation mix to meet the countries' NDC commitments can be highly effective in the near and medium terms to reducing energy costs for consumers, reduce the cost of fuel imports, and increase energy supply resilience. Grenada, Saint Lucia, and Saint Vincent and the Grenadines have key legal frameworks in place for energy transition and have begun the process of addressing regulatory gaps for investment in EE and RE with several pilot programs under implementation.

Grenada's Legal Frameworks

The following national policies, laws and regulations are relevant and directly applicable to the environmental and social risks and impacts of project activities.

National Energy Policy: Grenada's National Energy Policy (GNEP) is the country's overarching high-level planning document that will anchor the energy development agenda over the period 2022-2035. As of April 2024, the GNEP is in the process of Cabinet review and has not yet been published. The vision is built around the following broad themes: a thriving economy; an energy independent nation; and sustainable and resilient energy sector and energy services. It puts in place a systematic and comprehensive framework to guide the country's strategic priorities for balanced sustainable energy development over the medium term and simultaneously lays a solid foundation for Grenada's energy transformation over the long-term. Grenada is a nation with conscious and caring citizenry, promoting human dignity.

The NEP 2023-2035 draws inspiration from Grenada's National Sustainable Development Plan (NSDP) 2020-2035 setting out the vision for the country's sustainable development and is grounded in Grenadian aspirations: it represents the desire of the people to improve their quality of life and living standards for this and future generations.

The Government seeks to maximize collective benefits for the community through environmental, social and economic efficiencies, while preserving national interests and strengthening the resilience of energy services. The NEP 2023-2035 has been formulated through dialogue with energy stakeholders, and it is duly cognizant of the regional and global development trends that have local implications. It has been

designed with built-in flexibility to be operationalized through an Action Plan, which will translate the high-level goals and policies into concrete activities to achieve meaningful development results.

Electricity Supply Act (ESA): In 2017, Grenada amended the ESA, which established the legal framework for the country's energy transition, and an act creating Public Utilities Regulatory Commission (PURC). The PURC, which became operational in July 2019, is tasked with developing the regulatory framework to implement the ESA. A modern tariff-setting methodology and regulations for competitive procurement of RE generation capacity have been prepared by the PURC, in accordance with the principles of the ESA.

Grenada Vision 2030: Further to the publication of the Grenada National Energy Policy (2011), the 'Grenada Vision 2030' lays down the proposal to establish a 100% RE target for both the electricity and transport sectors for 2030. As a first step to determining the pathway towards this objective, a 100% RE showcase study is to be conducted in co-operation with the German government and a consortium of specialized companies. The Grenada Vision 2030 consists of four major projects, three focused on development of utility scale generation from geothermal, wind and waste-to-energy sources, and one on distributed solar. They are expected to require relatively little capital investment, given the small size of the economy and energy demand.

National Development Strategy for Grenada: One of the main objectives of the National Development Strategy for Grenada developed by the Government in 2007 is to promote and provide for disaster risk reduction and climate change adaptation. It specifies among the main threats climate change and lays down among others the specific objectives for 'integrating environmental and physical development considerations into national development' (land planning, buildings renewal, disaster risk reduction, awareness raising and education) and 'an enhanced economic infrastructure sector supporting the country's development' (exploration of alternative energy sources, increasing energy independence, address vulnerability of energy infrastructure to natural disasters).

National Sustainable Development Plan 2020-2035: This document's overall purpose is to create a resilient and prosperous nation, with a conscious and caring citizenry, promoting human dignity, and realizing its full potential through sustainable economic, social, and environmental progress for all.

Solid Waste Management Authority Act, 1995: The Act establishes a Solid Waste Management Authority charged with the duty of developing the solid waste management facilities and improving the coverage and effectiveness of solid waste storage, collection, and disposal facilities.

Draft National Environmental Policy and Management Strategy: The Strategy seeks to have full integration of environmental management into the development process and includes the following key elements:

- Environmental Impact Assessments (EIA): The Physical Planning and Development Control Act, 2016, allows the Planning and Development Authority to require EIAs for developments that could significantly alter the environment or occur within identified Environmental Protection Areas.
- Environmental Management Agency: The draft Environmental Management Act, 2005, proposed the creation of an Environmental Management Agency responsible for assessing developmental activities that may adversely affect the environment before such activities commence.
- Policy Frameworks: Several policy frameworks guide the preparation of environmental studies, including the Grenada National Ocean Policy and the Sauteurs Local Area Plan, which recommend EIAs for coastal developments.

- Integration with National Decision Making: The strategy facilitates the integration of biodiversity conservation and sustainable use into national decision-making and mainstreaming across all sectors of the national economy and policy-making framework.

National Climate Change Policy for Grenada, Carriacou and Petit Martinique 2017-2021: The Policy provides the framework for steering an efficient and effective integration of adaptation and mitigation in all climate-relevant sectors; inclusive of public infrastructure, green technology, agriculture, and human capital.

Data Protection Act, 2023: The act aims to safeguard personal data and enhance trust in digital transactions. The GDPA aims to establish a comprehensive data protection framework in Grenada, by providing data subject rights such as the right to access and rectification, establishing seven data protection principles, including data integrity and disclosure, as well as establishing restrictions to the processing of sensitive data. Furthermore, the GDPA provides for the creation of the Information Commission and defines its powers in investigating complaints and issuing notices. Additionally, the GDPA grants protection for whistleblowers. Notably, the GDPA does not set out specific requirements for data processing notifications or data transfers. Finally, the GDPA sets out the offenses and corresponding penalties.

Table 2 below identifies other national laws, policies and plans that apply to the Project and correspond to the World Bank's ESF

Table 2 Other Grenada legislation, policies and plans relevant to the Project

National Laws, Policies and Plans	ESS2	ESS3	ESS4	ESS5	ESS6	ESS8	ESS10
Abatement of Litter Act, 2015		✓			✓		
Accidents and Occupational Diseases (Notification) Act, 1985	✓		✓				
Carriacou Land Settlement and Development Act, 1970				✓	✓		
Constitution Order, 1973	✓			✓			
Data Protection Bill, 2023							✓
Employment Act, 1999	✓		✓				
Environmental Impact Assessment (EIA) Legislation, 2002				✓		✓	
Environmental Management Act, 2014		✓			✓		
Grenada Integrated Water Resources Management Plan, 2019		✓			✓		
Grenada National Hazard Mitigation Policy, 2007					✓		
Grenada National Land Policy, 1999					✓		
Grenada National Water Policy, 2019		✓			✓		
Grenada Solid Waste Management Authority Act, 1995		✓					
Grenada Mitigation Technology Needs Assessment Barrier Analysis and Enabling Framework, 2018	✓						
Grenville Local Area Plan, 2007					✓	✓	✓
Integrated Coastal Zone Management Act, 2019		✓			✓		
Land Acquisition Act (CAP 159), 1945 and Land Acquisition (Amendment) Act 16, 1991				✓			
Land and Marine Management Strategy for Grenada, 2008		✓			✓		
National Biodiversity Strategy and Action Plan (NBSAP), 2016 - 2020	✓						
National Climate Change Adaptation Plan (NAP) for Grenada, Carriacou and Petite Martinique, 2017-2021		✓			✓		
National Environment Policy & Management Strategy, 2007					✓		

National Laws, Policies and Plans	ESS2	ESS3	ESS4	ESS5	ESS6	ESS8	ESS10
National Heritage Protection Act, 1990					✓	✓	
National Parks and Protected Areas Act, 1991					✓	✓	
National Sustainable Development Plan 2020-2035					✓		
National Trust Act, 1967					✓		
National Water Policy, 2020	✓						
National Water and Sewerage Authority Act, 1990		✓			✓		
Non-Biodegradable Waste Control Act, 2018		✓					
Pesticides Control Act, 1973		✓			✓		
Physical Planning and Development Control Act, 2002		✓		✓	✓	✓	✓
Public Health Act, 1925		✓	✓				
Roadmap on Building a Greener Economy for Sustainable Development for Carriacou and Petite Martinique, 2012	✓						
Sauteurs Local Area Plan					✓	✓	✓
Strategic Program for Climate Resilience, 2011		✓			✓		
The Factories Act, 1967	✓		✓				
The Land Settlement Act (CAP 161), 1933				✓			
Waste Management Act, 2001		✓			✓		
Water Quality Act, 2005		✓					

Saint Lucia's Legal Frameworks

Saint Lucia's National Energy Policy (NEP) 2023-2030: The NEP outlines a strategic vision to transform its energy sector into a modern, sustainable, and decarbonized system. It emphasizes energy security, cost reduction, and increased local participation to achieve economic and environmental prosperity. Key goals include transitioning 50% of electricity generation to renewable sources by 2030, decarbonizing thermal applications and transportation, reducing energy intensity, and ensuring environmentally safe petroleum use. The policy also prioritizes expanding access to financing for renewable energy, improving institutional and technical capacities, and integrating social and gender considerations in energy development.

The NEP sets quantitative targets, such as having 33% of private vehicles and 30% of the public transport fleet powered by electricity by 2030. It also aims for a 20% reduction in energy consumption in schools and a 7% decrease in energy-related greenhouse gas emissions from 2010 levels. Supporting this transition, the government is fostering renewable energy investments, enhancing energy efficiency through public education and audits, and building infrastructure like charging stations for electric vehicles. This comprehensive plan seeks to balance economic challenges and international sustainability commitments while ensuring a just transition for workers and equitable access for all citizens.

National Energy Transition Strategy: This strategy is a road map which aims to reduce electricity costs and ensure energy independence through increased adoption of renewable energy and energy efficiency. Saint Lucia's energy transition opportunity supports constituents through cheaper electricity, and Saint Lucia Electricity Services Limited (LUCELEC), Saint Lucia's electric utility, can continue to profit and provide reliable service.

Electricity Act: Saint Lucia's Electricity Supply Act, amended in 2016, and the National Utilities Regulation Commission (NURC) Act of 2016 created the framework for electricity generation from RE by Independent Power Producers and established a multisector utilities regulator - the National Utilities Regulatory Commission (NURC). Several secondary regulations under the Act to guide implementation have been

drafted but these are still in the development stage and are not formally approved. The Net Metering Program, launched in 2009 by LUCELEC, has allowed consumers to connect their PV systems and sell extra electricity to the grid. However, the program allows limited PV capacity. It cannot exceed 5 kW for residential consumers and 25 kW for commercial customers. The NURC Notice #1 of 2022 published a Special Application Procedure for persons wishing to generate electricity through grid interconnection of systems beyond the set capacity limits with written justification for the application.

Electricity Supply Services (Amendment) Act, 2015: The Electricity Supply Services (Amendment) Act revises the Electricity Supply Act of 1964, which gives an 80-year monopoly to the generation, transmission, distribution, and sales of electricity to the Saint Lucia Electricity Services Ltd. It notably encourages the government to take appropriate regulations for the licensing and generation of energy production from renewable sources. The document defines renewables resources as being biomass, geothermal, heat, rain, sunlight, tides, waves, and wind. The Act authorizes the government to adopt regulations favoring renewables fiscally, through specific license fees and feed-in tariffs.

National Environment Policy and National Environmental Management Strategy: The National Environment Policy and National Environmental Management Strategy is a national policy with a cross-sectoral approach. The National Environment Policy provides the broad framework for environmental management in Saint Lucia and establishes links with policies and programs in all relevant sectors of economic and social development. The goal of National Environmental Policy is to ensure environmentally sustainable development as well as optimize the contribution of the environment to the economic, social, and cultural dimensions of development. The National Environmental Management Strategy aims to provide a concrete and practical work plan for the implementation of these strategic directions.

National Climate Change Adaptation Policy, 2013: The National Climate Change Adaptation Policy provides a framework for addressing the impacts of climate change, in an integrated manner, across all key sectors. While the Policy specifically addresses climate change adaptation, it is recognized that some activities provide meaningful adaptation, as well as mitigation, co-benefits, thereby increasing resilience in the face of existing and emerging climate change impacts.

National Land Policy, 2007: This policy is intended to guide the use, management, development, and administration of land resources in Saint Lucia to optimize the contribution of land to sustainable development.

Saint Lucia Solid Waste Management Authority Act, Revised 2008: This Act established the Saint Lucia Solid Waste Management Authority to provide coordinated and integrated systems for the collection, treatment and recycling and disposal of solid waste, including hazardous waste and undertake the management of sanitary landfills in Saint Lucia.

Saint Lucia Solid Waste Management Authority: The Authority is given the following mandate:

- Manage, regulate, control, and treat waste in Saint Lucia
- Establish, maintain, improve, and regulate the use sanitary landfills and facilities, in accordance
- with established scientific principles and practices
- Establish and manage facilities for the collection and treatment of all including hazardous waste
- Establish and maintain transfer stations
- Establish and promote a resource recovery system
- Oversee scheduling, safety and maintenance issues associated with solid waste management

- Promote and oversee public education related to solid waste management in collaboration with the relevant ministries
- Develop a network to receive, monitor and respond to public complaints.

Saint Lucia Data Protection Act (2011) and the Data Protection (Amendment) Act (2014): These Acts establish data protection principles that provide a comprehensive basis for the collection, processing, and use of personal data. The Act provides for obligations for data controllers, such as data processing notifications and detailed rights of access processes. In addition, the Act established the Data Protection Commissioner ('the Commissioner') and provided it with a wide range of powers, particularly in relation to investigations. The Amendment Act mostly implemented technical changes, however it also introduced privacy impact assessments, the exercise of which may be requested from a government department by the Commissioner and provided further protections for those who notify the Commissioner of possible violations of the Act.

Privacy and Data Protection Act: This Act makes provision for the protection of individuals in relation to personal data and to regulate the collection, holding, use, processing, correction, and disclosure of personal information in a manner that recognizes the right of privacy of individuals with respect to their personal information and for related matters. The Act details, among other issues, the rights of data subjects and the investigation and enforcement of the Act.

Table 3 below identifies other national laws, policies and plans that apply to the Project and correspond to the World Bank's ESF

Table 3 Other Saint Lucia legislation, policies and plans relevant to the Project

National Laws, Policies and Plan	ESS2	ESS3	ESS4	ESS5	ESS6	ESS8	ESS10
Climate Change Adaptation Policy, 2015					✓		
Constitution of Saint Lucia, Cap 1.01, 1979				✓			
Data Protection Act, 2011 and the Data Protection (Amendment) Act, 2014							✓
Disaster Management Act, 2006					✓		
Environment Impact Assessment Regulations (draft)		✓			✓		
Environment Management Bill (draft), 2014		✓			✓		
Hazard Mitigation Policy, 2006		✓			✓		
Land Acquisition Act, Cap 5.04, 1946				✓			
Land Conservation and Improvement Act, 1992					✓		
National Adaptation Plan (NAP), 2018-2028		✓			✓		
National Environment Policy (NEP) and National Environmental Management Strategy (NEMS), 2004		✓			✓		
National Land Policy, 2007		✓		✓	✓		
National Tourism Policy (draft), 2009		✓			✓	✓	
National Vision Plan, 2008					✓		
Physical Planning and Development Act, 2005		✓		✓	✓	✓	✓
Privacy and Data Protection Act							✓
Public Health Act, 1975		✓					
Saint Lucia Education Act (1999)	✓		✓				
Saint Lucia Employees (Occupational Health and Safety) Act (1985)	✓		✓				
Saint Lucia Equality of Opportunity and Treatment in Employment and Occupation Act (2000)	✓		✓				

Saint Lucia Labour Code, no. 37 of 2006	✓		✓				
Saint Lucia National Trust Act, 1975					✓		
Shipping Act, 2000		✓					
Village Tourism Policy and Strategy (draft), 2019					✓	✓	
Tourism Strategy and Action Plan 2020-2030 (2019)					✓	✓	
Waste Management Act, 2004					✓		
Water and Sewerage Authority Act, 1999		✓			✓		

Saint Vincent and the Grenadines' Legal Frameworks

The following national policies, laws and regulations are relevant and directly applicable to the environmental and social risks and impacts of project activities.

The Electricity Supply Act (ESA) of 1973 established the legal framework for electricity generation, transmission, and distribution in SVG. It also granted VINLEC a universal license until 2033. The Government of SVG is in the process of updating the ESA to support expansion of RE development and enhance the energy sector's resilience against climate change and natural disasters.

SVG's **National Energy Policy of 2009** aims to promote sustainable energy production and use by focusing on efficient management of energy sources, reducing dependence on imported fossil fuels, and utilizing renewable energy options like solar and wind power, while prioritizing a clean, reliable, and affordable energy supply for the nation; this policy was primarily established to address poverty reduction and carbon emission control concerns. SVG is in the process of updating its National Energy Policy and Action Plan and Electricity Supply Act.

The **Environmental Health Services Act, 1991**: Focuses on the conservation and maintenance of the environment to protect public health. Key aspects include regulation and monitoring, public health protection and pollution control.

Geothermal Resources & Development Act, 2015: The Geothermal Resources Development Act was published in 2015 to foster the use of geothermal resources in the national energy matrix. The Act establishes the National Energy Committee to formally rule over the developments in the energy sector as a whole. It designates the relevant Minister to declare a given portion of land to be exploited for its geothermal potential. Valid permitting and licensing must be obtained prior to any activity by a private entity. The act also stipulates compliance and safety measures.

A **National Energy Committee** addresses renewable energy issues. This committee plays a key role in shaping and guiding the country's energy policy, particularly as it pertains to the development and integration of renewable energy sources. The committee is involved in coordinating energy initiatives, promoting sustainable energy practices, and advising the government on renewable energy strategies to reduce reliance on fossil fuels, enhance energy security, and support sustainable development. The committee typically works on initiatives related to the use of solar, wind, hydro, and other renewable energy sources, providing recommendations on policies, projects, and investments to foster the growth of renewable energy in the country. It also supports efforts to improve energy efficiency, raise public awareness on renewable energy, and facilitate the transition to greener energy systems in line with international climate goals.

National Climate Change Policy, 2019: Provides overarching guidance for building resilience and mainstreaming climate change into the national development agenda for low carbon and sustainable growth. They lay out an institutional framework for an integrated and coordinated response that engages all stakeholders for climate change adaptation and mitigation and seeks to enable harmonization across sectoral policies and plans.

The National Adaptation Plan (NAP) is a comprehensive framework aimed at increasing resilience to climate-related risks, particularly in vulnerable sectors such as agriculture, water resources, health, coastal zones, and infrastructure. The National Adaptation Plan focuses on identifying priority areas for adaptation, implementing measures to reduce vulnerabilities, and integrating climate change adaptation into national development policies and strategies. The plan also emphasizes the need for stakeholder participation, capacity building, and resource mobilization to effectively address climate impacts. Saint Vincent and the Grenadines' NAP is part of the country's broader commitment to climate change mitigation and adaptation, in line with international agreements such as the Paris Agreement.

National Climate Change Strategy and Implementation Plan, 2019: Provides guidance on priorities and appropriate measures for adaptation and mitigation to reduce vulnerability to the impacts from climate change and build resilience over the long term in SVG.

Town and Country Planning Act, 1992 regulates land use and development. This act also provides the legal basis for environmental assessments and outlines the responsibilities of developers and government agencies.

Land Acquisition Act: Allows the government to acquire private land for public purposes, with the requirement to provide fair compensation to the landowners and is typically governed by a process involving a notice of acquisition and assessment by a designated board to determine the compensation amount; essentially enabling the government to expropriate land when needed for public projects.

Housing and Land Development Corporation Act: Assists the government in providing affordable housing opportunities for the people of the country. The HLDC is a state-owned enterprise, reporting to the Ministry of Housing, and governed by a Chairman and a Board of Directors.

Crown Lands Act: Vests the administration and disposal of Crown lands in the Governor General who may make regulations regarding the management, sale and letting of Crown lands, the occupation, allotment and survey of these lands and the issue of grants and fees payable. The Chief Surveyor, that heads the Lands and Surveys Department, manages the rental applications process.

The Waste Management Act, 2000 regulates the management and disposal of solid and hazardous waste. The act also controls the import and export of hazardous waste, including infectious waste.

Litter Act, 1991: Regulates and controls littering in St. Vincent & the Grenadines

Central Water and Sewerage Authority Act, 1991: Makes provisions for the conservation, control, apportionment, and use of the water resources of the islands.

Wildlife Protection Act: Provides for the protection of wildlife and matters connected therewith and incidental thereto, which may affect land use and physical development planning.

Saint Vincent National Trust Ordinance, 1969: The SVG National Trust was established to assist with – among other things – the preservation and management of historical monuments and sites and to safeguard the cultural patrimony of the country. The Trust established as a body corporate shall manage and conserve natural and cultural beauty and wealth of Saint Vincent. In order to achieve this objective, it shall in particular: conserve, acquire and hold land; locate and conserve areas of beauty including marine areas and conserve the natural live existing therein; and list flora and fauna for purposes of conservation.

The Public Health Act, 1977: Provides broad powers to the Ministry of Health and Environment to regulation various environmental aspects with public health significance.

Table 4 below identifies other national laws, policies and plans that apply to the Project and correspond to the World Bank's ESF**.**

Table 4 Other Saint Vincent and the Grenadines legislation, policies and plans relevant to the Project

National Laws, Policies and Plans	ESS2	ESS3	ESS4	ESS5	ESS6	ESS8	ESS10
Accidents and Occupational Diseases (Notification) Act, 1952	✓		✓				
Building Codes, 2008		✓					
Central Water & Sewerage Authority Act of 1991		✓					
Electricity Supply Act, 1973					✓		
Employers and Servants Act, 1937	✓		✓				
Employment of Foreign Nationals and Commonwealth Citizens Act, 1973	✓		✓				
Employment of Women, Young Persons and Children Act, 1935	✓		✓				
Environmental Health Services Act, 1991	✓	✓	✓		✓		
Environmental Management Bill, 2009				✓			
Equal Pay Act, 1994	✓		✓				
Factories Act, 1955 (Cap. 335)	✓		✓				
General Guidelines for Organisations: Safe Working During the COVID–10 Pandemic – SVGNS 85:2020	✓		✓				
Land Acquisition Act, CAP 322, 1947				✓			
Land Adjudication Act CAP 5:06, 1984				✓			
Land Settlement and Development Act, CAP 242, 2009				✓			
Litter Act of 1991		✓			✓		
Mayreau Environmental Development (SVG) Incorporation Act		✓			✓		
Mustique Conservation Act of 1989					✓		
National Economic and Social Development Plan 2013- 2025					✓		
National Emergency and Disaster Management Act, 2006					✓		
National Parks Act, 2002		✓			✓	✓	
National Parks and Protected Areas Systems Plan 2010-2014					✓	✓	
National Tourism Policy (2003)					✓	✓	
Occupational Safety and Health Act of 2017	✓		✓				
Protection of Employment Act, 2003	✓		✓				
Public Health Act No. 9 of 1977		✓			✓		
Public Health (Amendment) Act, 2020	✓		✓				
Public Health (COVID–19) Rules, 2021	✓		✓				
Revised National Biodiversity Strategy and Action Plan, 2017		✓			✓		
Constitution Order 1979, Updated 2005	✓		✓	✓			

National Laws, Policies and Plans	ESS2	ESS3	ESS4	ESS5	ESS6	ESS8	ESS10
National Energy Policy (NEP), 2009 and National Energy Action Plan, 2010					✓		
National Climate Change Policy and National Climate Change Strategy and Implementation Plan, 2019		✓		✓			
Sustainable Integrated Development & Biodiversity Conservation in the Grenadines Islands					✓		
National Trust Act, 2007 (as amended)					✓	✓	
Town & Country Planning Act No. 45, 1992 (amended in 2005)				✓	✓	✓	✓
Trade Disputes (Arbitration and Inquiry) Act, 1940	✓		✓				
Trade Unions Act, 1950	✓		✓				
Wages Councils Act, 1953	✓		✓				
Waste Management Act, 2000		✓			✓		
Wildlife Protection Act of 1987					✓		

National Environmental and Social Assessment and Permitting

Grenada's Environmental and Social Assessment and Permitting: Grenada's national government can require the preparation of environmental studies and assessments through the Waste Management Act and the Planning and Development Authority (PDA). The PDA provides for the control of the physical development of public and private land in Grenada to, among other things: ensure sustainable land use; maintain and improve the quality of the physical environment; provide for the orderly subdivision of land; and protect and conserve the natural and cultural heritage of Grenada. The PDA is responsible for the preparation of physical development plans, monitoring, and control procedures as well as the performance of EIAs. Schedule III of the Planning Act which lays out 23 types of development which require an EIA by law. Development of land (as defined) requires written permission from the PDA and the PDA may require an environmental impact assessment statement in addition to specified information to be provided by an applicant.

Saint Lucia's Environmental and Social Assessment and Permitting: Saint Lucia's national government can require the preparation of environmental studies and assessments regarding new constructions and land development. The Planning Act makes the provision of undertaking an environmental impact assessment (EIA) for specific projects, which may affect the environment. Depending on the nature of the proposed development work and likely negatively impact on the environment, an EIA report must be submitted to evaluate the application and make decisions. The EIA must be guided by the terms of reference (ToR) provided by the country's Development Control Authority and the work undertaken by a qualified professional.

Physical Planning and Development Act, 2005: Key legislation governing Saint Lucia's preparation of environmental studies and assessments includes the Physical Planning and Development Act, 2005. The Physical Planning and Development Act is to make provision for the development of land, the assessment of the environmental impacts of development, the grant of permission to develop land and for other powers to regulate the use of land, and for related matters. A person shall not commence or carry out the development of any land in Saint Lucia without the prior written permission of the Head of the Physical Planning and Development Division. An application to the Head of the Physical Planning and Development Division for permission to develop land shall be made on the prescribed form and shall be accompanied by:

- a map sufficient to identify the land to which it relates and such plans, drawings, and other materials as are necessary to describe the development which is the subject of the application;
- notice in writing signed by the owner or agent of the owner of the land to which the application relates acknowledging that the owner has knowledge of and does not object to the making of the application;
- any statutory consent which the applicant is required to obtain for or in connection with the development prior to applying for the permission of the Head of the Physical Planning and Development Division;
- In cases where this is required by regulations made under this Act, the certificate of an engineer registered under the Engineers (Registration) Act; and
- proof of payment of such fees as may be prescribed by regulations made under this Act.
- This act may be relevant to the rehabilitation and retrofitting of existing public buildings.

Given the works considered under this project, the Electrical Department of the Ministry of Infrastructure, Ports, Transport, Physical Development and Urban Renewal would approve and certify the works. The Chief Electrical Engineer would inspect the sub-project site before, during and at the completion of the work.

Saint Vincent and the Grenadines' Environmental and Social Assessment and Permitting:

The **Electrical Inspectorate** in Saint Vincent and the Grenadines is responsible for ensuring the safety and compliance of electrical installations across the country, including residential, commercial, industrial, and utility systems. It inspects and certifies electrical work to ensure adherence to national safety standards and codes, issues licenses to qualified electrical contractors, and conducts investigations into electrical accidents or faults. The Inspectorate also educates the public on electrical safety practices to minimize risks and hazards. The Electrical Inspectorate applies to utilities as well. The Inspectorate is responsible for ensuring that electrical installations and systems used by utility companies, such as power generation, distribution networks, and infrastructure, meet safety standards and regulatory requirements. This includes inspecting and certifying the utility's electrical infrastructure to ensure it operates safely and efficiently, thereby protecting public safety and preventing electrical hazards. The Inspectorate also plays a role in monitoring compliance with national electrical codes for utilities, ensuring that all aspects of electrical work, whether residential, commercial, or utility-based, are safely managed.

SVG's national government can require the preparation of environmental studies and assessments regarding new constructions and land development. The Town and Country Planning Act makes the provision of undertaking an environmental impact assessment (EIA) for specific projects, which may affect the environment. Depending on the nature of the proposed development work and likely negatively impact on the environment, an EIA report must be submitted to facilitate evaluation of the application and decision-making. The EIA must be guided by the terms of reference (ToR) provided by the country's Physical Planning and Development Board and the work undertaken by a qualified professional.

Town and Country Planning Act (1992): The Act establishes the framework for development control, including development zoning and the designation of tree preservation orders, listed buildings, and building preservation orders. It describes the types of development for which advance planning permission is required and provides the process for applying for the consent. An application would normally require an accompanying environmental impact assessment if the development is in a

prescribed area or of a prescribed category or is likely to cause pollution or have an adverse effect on the environment. affects a preserved, including when an Environmental and Social Impact Assessment is to be submitted in support of the application.

The **Supplementary Act to the Environmental and Social Assessment (ESA)** in Saint Vincent and the Grenadines is designed to complement and enhance the implementation of environmental and social assessments related to development projects. It ensures that such projects are properly evaluated for their potential environmental and social impacts and establishes processes for mitigating adverse effects. The Supplementary Act provides additional legal and procedural requirements that build on the original ESA framework, strengthening the assessment process. This includes guidelines for public consultations, the involvement of stakeholders, and mechanisms for monitoring and enforcing compliance with environmental and social standards. The overall aim is to promote sustainable development by ensuring that projects in the country consider both environmental preservation and social well-being.

Environmental and Social Context

Grenada Environmental and Social Context

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 Saint Catherine (2,757 feet [840 metres]) in the northern part of the interior. The landscape is scenic, with deep steep-sided valleys and about 10,000 acres (4,000 hectares) of forest. Data indicates that as of 2022, 52% of Grenada's total area was covered in forests, according to the FAO's Global Forest Resources Assessment (FRA). Grenada's forest cover has remained relatively stable from since 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.

As of the last census in 2021, Grenada has a population of 124,610 people, with a nearly equal distribution between males (62,356) and females (62,254). Grenada's GDP has shown significant fluctuations in recent years. The country experienced a deep recession in 2020 due to the COVID-19 pandemic, with real GDP contracting by 13.8%. However, the economy showed signs of recovery with an estimated GDP growth of 5.3% in 2021, driven by public construction projects and a gradual recovery in the tourism sector. Following the economic contraction caused by the COVID-19 pandemic, Grenada's economy recovered, reversing losses in poverty reduction. This recovery was supported by the tourism and construction sectors. Despite progress in reducing consumption-based poverty, Grenada remains highly exposed and vulnerable to natural hazards, which are expected to increase in intensity and frequency due to climate change. The economy's heavy reliance on tourism makes it susceptible to global business cycles and natural disasters.

Saint Lucia Environmental and Social Context

Saint Lucia is part of the Lesser Antilles, an arc of volcanic peaks located in the Eastern Caribbean. 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. The Sulphur Springs area of Soufriere is a choice tourist site, and the springs therein also contain substantial energy potential.

Though 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 United Nations Educational, Scientific, and Cultural Organization World Heritage site, the Ma Koté Mangrove and Savannes Bay 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.

As of 2021 St Lucia's population was about 179,651. Despite being one of the smallest countries in the world (617 square kilometers or 238 square miles) and ranking 191st in size, St Lucia has a high population density of 298 people per square kilometer, which ranks 41st. The capital and largest city is Castries, which has more than one-third of the total population. Castries is a major tourist destination and a cruise ship port. Saint Lucia's population is evenly split between rural and urban areas, despite the high population in Castries. 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%). The country's economy depends primarily on tourism (65% of GDP), banana production, and light manufacturing.

Saint Vincent and the Grenadines' Environmental and Social Context

Saint Vincent and the Grenadines, a multi-island country lying within the Lesser Antilles, in the eastern Caribbean Sea. It consists of the island of Saint Vincent and the Grenadine Islands, which stretch southward toward Grenada. The island of Saint Vincent lies about 20 miles (32 km) southwest of Saint Lucia and 100 miles (160 km) west of Barbados. It is 18 miles (30 km) long and has a maximum width of 11 miles (18 km). The larger islands of the Grenadines associated with Saint Vincent are Bequia, Canouan, Mayreau, Mustique, Prune (Palm) Island, Petit Saint Vincent Island, and Union Island. The Tobago Cays, just to the east of Mayreau, have been designated a wildlife reserve. SVG has a population of approximately 100,000 people, with approximately 90% of the population African Descent and the remaining 10% a combination of East Indian, European, and Indigenous peoples. The 2022 GDP in US$ billion: 0.9 (2022) and 2022 GDP per capita is US$ 8,557.1. The tourism sector is a significant contributor to the economy, attracting visitors to the island's natural beauty and recreational activities. Agriculture also plays a crucial role in the economy, with the production of crops such as bananas being particularly important.

The COVID-19 pandemic and the 2021 volcanic eruption significantly impacted the economy, leading to increased public debt and fiscal deficits. Poverty remains a significant issue, with the last available data indicating a poverty rate of 30.2% in 2008. The country is also particularly vulnerable to climate change and natural disasters such as volcanic eruptions, hurricanes, and flooding. Recent events like the volcanic eruption in 2021 and subsequent flooding have had significant impacts on the population and economy. Saint Vincent and the Grenadines continues to face significant challenges due to its vulnerability to natural

disasters and economic shocks, but ongoing efforts in infrastructure development aim to support economic growth and diversification.

Potential Environmental and Social Risks

The Project will support RE development which will have positive environmental impacts by reducing the reliance on imported fossil fuels. Identified risks and impacts summarized in this section are primarily related to activities under Component 3 of the Project. Under Component 3, supply, installation of T&D lines, upgrade of substations and modernization of grid control centers will take place. Though the exact locations of the investments are not yet fully defined; site-specific environmental risks are primarily to occur during construction such as pollution management, waste management, workers and community occupational health and safety.

The Project's likely social risks relate to land acquisition and resettlement[2] under Component 3, labor and working conditions, OHS (e.g., safety hazards for workers such as risks of accidents due to working at heights, life and fire safety risks), community health and safety, and mitigating the risk of forced labor in the global supply chain for solar panels and solar components.

Table 5 E&S Risks

Key E&S Aspects	Risks
Pollution	- Air pollution from improper dust management at the site - Noise pollution - Soil and water pollution caused by runoff or petroleum compounds from leaking equipment or stored materials - Contamination of groundwater and surface water by discharged effluent
Waste	- Improper sanitary facilities during construction - Inadequate solid waste management - Hazardous waste management
Community Health and Safety	- Traffic delays and road closures impacting all road users (vehicular and pedestrian) originating from or traversing through the area, Businesses and other sensitive receptors operating in the area - Public Health and Safety concerns, through reduced air quality and safety of passage near the works for pedestrians and vehicles - Risk of Social Conflict with the Contractor's personnel and the wider public. - Workplace discrimination - Stakeholder consultations and public disclosures
Occupational Health and Safety	- Slippage and falling from working at heights - Electrocution - Working with Hazardous Substances
Stakeholder Engagement	- Potential exclusion of some groups particularly vulnerable groups from project benefits and activities, particularly if there is no adequate socialization of project activities

[2] A Resettlement Framework (RF) will be prepared as a precautionary measure in case land acquisition and/or involuntary physical/economic displacement is required in one or more subproject sites.

E&S Process

The process whereby environmental and social risks in relation to individual sub-projects are identified, assessed and managed is given in Table 6.

Table 6 Project Cycle and E&S Management Procedures

Project Stage	E&S Stage	E&S Management Procedures
a. Subproject conceptualization/pre-feasibility: Subproject identification	Screening	- During subproject identification, ensure subproject eligibility by referring to the Exclusion List in Annex 1**.** - For all activities not excluded, use the Screening Form in Annex 2 to identify and assess potential environmental and social impacts, and identify the appropriate risk level of each activity
b. Feasibility and Design: Planning for subproject activities, including human and budgetary resources and monitoring measures.	Assessment	- Based on the level of risk prepare relevant plans. - For activities requiring Environmental and Social Management Plans (ESMPs), submit the ESMPs for prior review and no objection by the WB. - Ensure that the contents of the ESMPs are shared with relevant stakeholders in an accessible manner and consultations are held with the affected communities. -
c. Construction and Operation: Implementation support and continuous monitoring of activities.	Implementation of E&S measures	- Incorporate relevant environmental and social mitigation measures into contractor bidding documents - Ensure implementation of E&S measures through site visits, regular reporting from the field and other planned monitoring. - Track grievances/beneficiary feedback. - Continue awareness raising and training for relevant staff, contractors, communities.
d. Review & Evaluation: Qualitative, quantitative and/or participatory data collection on a sample basis.	Completion	- Assess whether mitigation measures have been effectively implemented. - Ensure that physical sites are properly restored.

a. Subproject conceptualization/pre-feasibility – E&S Screening

As a first step, the Environmental Specialist, and the Social Specialist (E&S Specialists) will screen all sub-project sites to ensure that they are within the boundaries of the Project's eligible activities, and they are not considered as activities listed on the E&S Exclusion List (Annex 1). As a second step, the E&S Specialists will use the Environmental and Social Screening Form (Annex 2) to identify and assess relevant environmental and social risks specific to the activities. After screening, a risk assessment will be carried out for the sub-projects that are not rejected in the first step. The E&S Specialists will assess the magnitude of each risk/impact against criteria of probability and severity, as shown in Table 7.

Table 7 Risk Assessment Matrix

Probability of risk/impact	**Severity of risk/impact**			
	Low	Moderate	Substantial	High
High	Moderate	Substantial	High	High
Substantial	Moderate	Substantial	Substantial	High
Moderate	Low	Moderate	Substantial	Substantial
Low	Low	Low	Moderate	Substantial

Based upon these ratings, each risk/impact will be assigned a rating of "low", "moderate", "substantial" or "high." The overall sub-project will take the highest risk rating for individual risks/impacts. For example, a project with three "low" risks and one "substantial" risk will be given the overall rating of "substantial."

A sub-project is classified as ***low risk*** if its potential adverse risks to and impacts on human populations and/or the environment are likely to be minimal or negligible. Such projects require E&S assessment proportionate to the risk.

A sub-project site is classified as ***moderate risk*** after considering, in an integrated manner, the risks and impacts of the sub-project, considering the following, as applicable:

1. the potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the sub-project is not complex and/or large, does not involve activities that have a high potential for harming people or the environment, and is located away from environmentally or socially sensitive areas. As such, the potential risks and impacts and issues are likely to have the following characteristics:
    - predictable and expected to be temporary and/or reversible;
    - low in magnitude;
    - site-specific, without likelihood of impacts beyond the actual footprint of the sub-project; and
    - low probability of serious adverse effects to human health and/or the environment (e.g., do not involve use or disposal of toxic materials, routine safety precautions are expected to be sufficient to prevent accidents, etc.).
2. The sub-project's risks and impacts can be easily mitigated in a predictable manner.

A sub-project site is classified a ***substantial risk*** after considering, in an integrated manner, the risks and impacts of the sub-project, considering the following, as applicable:

1. The sub project may not be as complex as high-risk sub-projects, its E&S scale and impact may be smaller (large to medium) and the location may not be in such a highly sensitive area, and some risks and impacts may be significant. This would consider whether the potential risks and impacts have the majority or all the following characteristics:
    - they are mostly temporary, predictable and/or reversible, and the nature of the sub-project does not preclude the possibility of avoiding or reversing them (although substantial investment and time may be required);
    - there are concerns that the adverse social impacts of the sub-project, and the associated mitigation measures, may give rise to a limited degree of social conflict, harm, or risks to human security;
    - there is medium to low probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.), and there are known and reliable mechanisms available to prevent or minimize such incidents.
2. The effects of the sub-project on areas of high value or sensitivity are expected to be lower than high risk sub-projects.

A sub-project site is classified as ***high risk*** after considering, in an integrated manner, the risks and impacts of the sub-project, considering the following, as applicable:

1. The sub-project is likely to generate a wide range of significant adverse risks and impacts on human populations or the environment. This would consider whether the potential risks and impacts associated with the sub-project have the majority or all the following characteristics:
    - long term, permanent and/or irreversible, and impossible to avoid entirely due to the nature of the sub-project;
    - significant adverse cumulative impacts; and
    - a high probability of serious adverse effects to human health and/or the environment.

2. Some of the significant adverse E&S risk and impacts of the sub-project cannot be mitigated or specific mitigation measures require complex and/or unproven mitigation, compensatory measures or technology, or sophisticated social analysis and implementation.
3. There are significant concerns that the adverse social impacts of the sub-project, and the associated mitigation measures, may give rise to significant social conflict or harm or significant risks to human security.
4. There are several factors outside the control of the sub-project that could have a significant impact on the E&S performance and outcomes of the sub-project.

b. Subproject Feasibility and Design – E&S Assessment

The E&S Specialists will determine which E&S documents are to be prepared, proportionate to the scale of proposed activity and the level of risk. The E&S specialists at the national PIUs will either prepare the documents or contract out the work. If the work is contracted out, the E&S specialists of the PIU will prepare the ToRs based on the results of the screening, site visits, and risk rating.

Preparation of documents at the subproject level will be in line with the following guidance:
- Sub-projects with an overall risk rating of "**low**" will be required to apply ESCOPs
- Sub-projects with an overall risk rating of "**moderate**" will be required to prepare documents for the applicable ESS(s), as shown in Table 7.
- Sub-projects with an overall risk rating of "**substantial**" will be required to prepare documents for the applicable ESS(s), as shown in Table 7
- Sub-projects with an overall risk rating of "**high**" will be excluded.

Table 8 Documentation Requirements by Risk Rating

ESS	Risk rating			
	Low	**Moderate**	**Substantial**	**High**
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Apply ESCOPs capturing appropriate measures	Implement ESMP*	Implement ESIA and ESMP	N/A (site excluded)
ESS2: Labour and Working Conditions	Implement Project LMP, with grievance mechanism for project workers and an OHS plan. Specific labour guidance will be included in the ESMP, as warranted. GRM for workers by contractors			N/A (site excluded)
ESS3: Resource Efficiency and Pollution Prevention and Management	Apply ESCOPs capturing appropriate measures	Implement ESMP which includes detailed waste management procedures		N/A (site excluded)

ESS	Risk rating			
	Low	Moderate	Substantial	High
ESS4: Community Health and Safety	Apply health and safety measures as part of the ECOPs	Implement ESMP with Traffic management plan, community health and safety plan		N/A (site excluded)
ESS5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	If land acquisition in one or more subproject sites appears to be likely, a Resettlement Plan (RP) will be prepared.			N/A (site excluded)
ESS8: Cultural Heritage	Apply Chance Find Procedures as part of ECOP	Apply Chance Find Procedures as part of the ESMP		N/A (site excluded)
ESS9: Financial Intermediaries	N/A to Component 3 activities			
ESS10: Stakeholder Engagement and Information Disclosure	Implementation of Project SEP, with grievance mechanism. Specific actions on stakeholder engagement will be included in the ESMP, as warranted, including specific details for grievance mechanism at the subproject site.			N/A (site excluded)

* Based on the location and nature of the activity and environmental and social impact assessment maybe required.

Based on the risk assessment, Environmental and Social Codes or Practices (ESCOPs) (Annex 3) maybe adopted or Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs) (Annex 4) may need to be prepared.

An ESIA assesses the potential E&S impacts of the proposed sub project, evaluates alternatives, and describes appropriate mitigation, management, and monitoring measures. The ESIA covers the entire life cycle of the subproject from construction to operations and closure.

The ESMP includes measures to be taken during the implementation and operation of a project to eliminate the adverse environmental and social impacts, or to reduce them to acceptable levels. The ESMP will include measures for stakeholder engagement and other associated plans such as the community health and safety plan, waste management plan, traffic management plan and resettlement plan (See Annex 9 for more details) Simplified versions of these other associated plans may be attached to the ESMP or developed as stand-alone documents depending on the risk level involved. To inform the ESMP preparation, generic mitigation measures based on potential impacts identified during the stakeholder engagement activities during project preparation are given in Table 9. These measures should be updated during project implementation based on site specific impacts identified.

The screening forms, ESIAs and ESMPs developed by Grenada, Saint Lucia and Saint Vincent and the Grenadines will be submitted to the WB for prior review and no objection.

For Component 2 activities, E&S Specialists in national PIUs will work in coordination with the E&S specialists of ECPCGC to screen potential sub-projects, identify the instruments needed to be prepared by the independent power producers (IPPs) and incorporate the E&S requirements in the bidding documents. The screening checklist in Annex 2 can be used to carry out the screening of potential sites.

Table 9 Environmental and Social Risks and Mitigation Measures

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	**Minimize**	**Mitigate**	**Compensate/Offset**
Risks related to planning, supervision, assessments, and unintended impacts **(ESS1)**	ESS1 is an umbrella standard to ensure that procedures are in place to manage Project-related environmental and social risks.	Ensure subproject eligibility by screening through the Exclusion List. Exclude subproject sites that do not qualify.	Utilize the Screening Form in Annex 2 to identify and assess potential environmental and social impacts and identify the appropriate risk level of each activity.	Implement ESCOPs and ESMPs and ensure adequate supervision is in place during works.	
Occupational health and safety risks **(ESS2)**	Works will require work at heights, instable scaffolding, and inadequate harnessing/safety gear expose workers to significant risk of falls. Workers are also exposed to the risk of electrocution under the works considered under the Project. Other risks include exposure to physical hazards from using heavy equipment and increasing levels of dust and noise.	All contractors must develop an OHS plan per the ESMP requirements. Do not allow contractors' work commencement without an approved OHS plan. Educate and train the workers on the OHS standards regularly. Make OHS Specialist requirements mandatory in contractors' bidding documents and an OHS team. Appropriate sign-posting of construction sites should inform workers of rules and regulations to be	Identify all hazards and include them in the OHS plan Include provision of OHS Specialist on-site to manage any injuries or illness and provide for stabilization before transportation to medical facility in OHS plan Monitor and inspect the work area regularly Tidy wiring for easy maintenance and reduces the risk of accidents. Personnel will be required to always wear appropriate PPE. Apply LMP (Annex 5)	Conduct audits by independent reviewers of the sites, identify unsafe conditions and acts and engage leadership to ensure compliance. Raise contractor and building manager awareness on electrical hazards and health and safety concerns, as well as proper maintenance of RE and BESS equipment. Apply LMP (Annex 5)	Appropriate compensation for workers in case of workplace injuries, as per the national regulation and the absence of such, must be included in the contractors' bidding documents.

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	**Minimize**	**Mitigate**	**Compensate/Offset**
		followed. Scaffolding and harnesses will be utilized for working at heights.			
Generation, management, and disposal of hazardous and non-hazardous waste **(ESS3)**	If waste is improperly managed, it will create a health and safety hazard, to stakeholders who continue to use adjacent spaces and land and water pollution, public health hazards, landscape degradation and reduction in amenity value, arising from inappropriate/ inadequate solid waste disposal practices.	Avoid beginning work without conducting a risk assessment of the construction area to identify the types of waste present and types of waste expected to be generated Burning of waste materials should be avoided	Minimize contact with hazardous waste, even with the use of proper personal protective equipment (PPE) Store and dispose of all waste safely and on time to minimize unexpected contact or accidents. Construction wastes must be reused or recycled whenever possible Limit the number of waste-producing activities to the minimum amount required.	Prepare a waste management plan that outlines the sorting, handling, transport, and discarding/dumping of hazardous and non-hazardous waste. Maintain onsite waste collection and disposal facilities Provide different waste bins for dumping biodegradable, reusable and recyclable waste. Conduct awareness-building meetings and training for employees. Quality housekeeping practice must be maintained through regular inspections. Implement the regional waste management strategy to be developed under the project which will cover the safe removal, disposal and	N/A

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	**Minimize**	**Mitigate**	**Compensate/Offset**
				management of the equipment, appliances, and batteries.	
Construction-Related Dust Generation, Vibration, Noise, Standing Water and Odor **(ESS2, ESS3, ESS4)**	Construction-related risks are expected to be short-term, localized, and reversible. Air pollution is expected to be minimal.	Restrict noise as much as is reasonably practical during peak use times of sub-project site Avoid transport without putting proper measures in place. Avoid earthen roads for transporting construction materials Avoid storing construction materials near water bodies and community areas. Place the dust generation equipment and other powered equipment away from sensitive receptors to avoid complaints.	Minimize transporting dust, noise, and odor-generating material through residential areas. Mechanical equipment to be enclosed Maintain a buffer zone between the project site and residential areas to lessen the impact of noise. Stocking of construction materials and machinery must be within a limited area. Stockpiles of construction materials must be covered to protect them from wind and weathering action. Limiting activities for producing fugitive dust particles, e.g., handling of the construction materials etc. Transport vehicles must not be overloaded.	Apply mitigation measures and good international industry practice as delineated in ***WB Group General Environmental, Health and Safety (EHS) Guidelines*** Create a construction management plan that determines the dust, noise, and odour-generating areas and activities. Have mitigating measures for any such activities. Wet dry areas on a regular basis Workers to wear PPE such as dust masks Repair and maintain machineries for safe and quiet operation. Vehicle speed restrictions (must be enforced to control dust generation. Construction materials must be covered to protect from wind	N/A

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	Minimize	Mitigate	Compensate/Offset
			Avoid queueing vehicles adjacent to the site, particularly near sensitive receptors, including housing. Switch off / throttle down all site vehicles, water vessels, generators and machinery when not in use.	Regular air monitoring must be carried out near the sensitive receptors to ensure ambient air quality remains within limits defined by national standards Create a Traffic Management Plan to reduce vehicular and pedestrian congestion.	
Disturbance or damage to cultural heritage sites **(ESS8)**	Works under the Project may impact cultural heritage sites.	Assess design alternatives to avoid impacts under ESS8.	Assess different design alternatives to minimize impacts under ESS8. All facades worked on will be returned to their original form. Include Chance Find Procedures in all contracts relating to construction or civil works. (Annex 10)	Consult with cultural heritage stakeholders such as the National Trusts, early in the project preparation phase and throughout implementation, particularly when works are taking place in cultural heritage sites. Develop a Cultural Heritage Plan if works are expected to have a major impact on the site. Include Chance Find Procedures in all contracts relating to construction or civil works. (Annex 10)	N/A
	Selected sub-project sites may affect disadvantaged and vulnerable	Follow the relevant measures included in	In identifying subproject activities and	Proactively identify, consult with, and reach	N/A

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	Minimize	Mitigate	Compensate/Offset
Exclusion of disadvantaged and vulnerable persons/communities **(ESS10)**	persons/communities. These effects are expected to be positive. However, the engagement with these groups will capture and mitigate any negative effects of project activities.	the project design and the Stakeholder Engagement Plan (SEP) prepared for the project.	beneficiaries, conduct inclusive and accessible consultations with community members, community leaders and representatives, and local authorities. Provide transparent information on project activities through accessible channels/means and trusted intermediaries	out to disadvantaged and vulnerable groups and households (through surveys, consultations, or other means as appropriate). Ensure that the grievance/beneficiary feedback mechanism is accessible by disadvantaged and vulnerable groups through raising awareness among these groups and providing different intake channels.	
Forced Labour **(ESS2)**	The procurement of solar panels and solar components involves a risk of forced labor in the global supply chain.			The RCU (which will provide a pooled procurement service to the Project) will require bidders to provide two declarations: a Forced Labor Performance Declaration (which covers past performance), and a Forced Labor Declaration (which covers future commitments to prevent, monitor and report on any forced labor, cascading the requirements to their own sub-contractors	

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	Minimize	Mitigate	Compensate/Offset
				and suppliers). In addition, the Project will include enhanced language on forced labor in the procurement contracts.	
Data Privacy Breeches **(ESS10)**	During implementation, data collected on individuals during consultations, in surveys and in the grievance management process may be compromised and subsequently compromise the quality of stakeholder participation. Disadvantaged and vulnerable communities are most at risk if their identity is misused.		Conduct training and monitoring to address these risks. Specify instructions for who could have access to personal data, the way personal data should be stored manually and electronically, and the safeguards to ensure that only authorized persons have access to it	Inform stakeholders on why their personal data is being processed, how it will be processed and protected, and avenues available for them to seek redress if it is misused Provide privacy notices and consent forms prior to data collection, and explain to stakeholder why they consent is requested Access restrictions to case management system of project-level grievance mechanisms Retain personal stakeholder data for only as long as required by the Project. Include mitigation in TORs for E&S instruments, cascaded in contracts to all relevant parties	

c. Construction and Operation –Implementation of E&S Measures

Bidding documents and Contracts: Sub-project ESMPs and all contractor requirements should be incorporated by the PIU into bidding documents for the works. Contractors should be made aware of their obligations upfront and will include the cost of implementing the E&S requirements in their bids. The Contractor should submit Management Strategies and Implementation Plans (MSIPs) or a Contractor ESMP (C-ESMP) outlining how during construction the contractor will avoid, minimize, or mitigate effects on the environment and surrounding area based on the requirements given in the bidding documents. MSIPs/C-ESMPs are subject to approval by the PIU E&S Specialists and are to be reviewed if updated during construction.

The PIU E&S specialists will be responsible for overall supervision of the works, but a supervision engineer may oversee the daily on-site construction activities and ensure compliance with the contractor environmental and social management plans and E&S specifications. Where non-compliances are observed, the E&S specialists/supervision engineer will stop the works and work with the contractor to rectify the problem in coordination with the PIU. The WB will also monitor through supervision missions.

Reports to the WB will be submitted on a quarterly basis. Annex 12 includes an E&S monitoring template that can be used during site visits by the E&S specialists. An ESCP reporting template is given in Annex 11 which has to be customized based on the Negotiated ESCP. The quarterly progress report should capture the information below:

- Status of preparation and implementation of E&S documents
- Status of ESHS performance of subprojects during implementation
- Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan
- Inputs into procurement process, including preparation of terms of reference or E&S specifications, and bids reviewed
- No of inspections/surveys/site visits undertaken, including for screening/scoping, team discussions, surveys or data gathering, or supervision of works (and key issues noted)
- Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them
- E&S performance of contractors and subcontractors as reported through contractors' and supervision firms' reports
- Number and status of resolution of incidents and accidents reported
- Other aspects that may arise as relevant.

Throughout project implementation, the E&S Specialists will continue to provide training and awareness raising to relevant stakeholders, such as staff, contractors, and communities, to support the implementation of the environmental and social risk management mitigation measures. An initial list of training needs is proposed in Table 10.

The sub-project site relevant CLOs as well as the E&S Specialists and will also track grievances and beneficiary feedback to monitor implementation of project activities and environmental and social mitigation measures.

If the staff within the PIU becomes aware of an incident which may have significant adverse effects on the environment, the affected communities, the public or workers, it should notify the WB within 24 hours of becoming aware of such incident. A fatality is automatically classified as a serious incident, as are incidents of forced or child labor, abuses of community members by project workers (including gender-based violence incidents), violent community protests, or kidnappings. Annex 8 is an Incident form to report incidents related to workers' safety at the sub-project site. PIUs will provide sufficient details about the incident or accident, indicating the immediate measures taken to address it, including information provided by any contractor and supervisory entity, as appropriate. Subsequently, the PIUs will prepare more detailed report(s) on the incident or accident, where it will propose measures to prevent it from happening again. Where non-compliances are observed, the E&S Specialists will stop the works and work with the contractor to rectify the problem in coordination with the PIU.

d. Review and Evaluation – E&S Completion

Upon completion of Project activities, E&S Specialists will evaluate progress and completion of project activities and environmental and social mitigation measures, including assessing whether plans have been effectively implemented. The E&S Specialists will also monitor activities regarding site restoration in the affected areas to ensure that the activities are done to an appropriate and acceptable standard before closing the contracts. The sites must be restored to at least the same condition and standard that existed prior to commencement of works. Any pending issues must be resolved before a subproject is considered fully completed. The E&S Specialists will prepare the completion report describing the compliance of E&S risk management measures and submit it to the WB.

Implementation Arrangements

The Project will be implemented at the national and regional level, under a regional coordination framework. The implementation arrangements are designed to ensure strong ownership of the PDO and the implementation of components by the participating countries, facilitate synergy and economies of scale, and strengthen coordination among countries at the regional level. At the national level, the line ministries and agency responsible for the energy sector of the participating countries will be responsible for the execution of the Project, working in close collaboration with the Ministry of Finance (MOF) and other ministries in the national cabinets for their respective project sub-components. Each participating country will have a PIU that will be responsible for planning and implementing all activities in the country and reporting to the responsible line ministry.

Regional Entity: The project will be anchored within the Eastern Caribbean Partial Credit Guarantee Corporation (ECPCGC) as the Regional Entity that will set up Regional Steering Committee (RSC) with a designated chairman.

Regional Steering Committee (RSC): The project will be hosted by ECPCGC with the Regional Steering Committee (RSC) that includes senior representatives of the government of each participating country participants and ECCB. The RSC will oversee project implementation and provide strategic guidance and facilitate decision-making on critical matter. The RSC will approve annual work plans, and facilitate collaboration, meeting at least annually to assess implementation progress.

The Regional Renewable Energy Coordinating Unit (RCU), hosted within the ECPCGC and under the strategic guidance of the RSC, will coordinate the overall project implementation, carry out the Component 1 and Component 2 and support national PIUs to execute the Components 3 and 4.

For Component 2, the RCU will support national PIUs in identifying a pipeline of high-priority, utility-scale RE projects and aid in the preparation of these projects via feasibility studies and other assistance to ensure their readiness for an internationally competitive bidding process.

The RCU will include E&S aspects in and sign service level agreements (SLAs) with national PIUs to manage E&S risks and impacts of the Project.

National Project Implementation Units (PIUs): The project will leverage existing PIUs in the energy sector where it is possible or create new ones, where needed. The aim is to aggregate and take advantage of existing experience in World Bank project implementation. The National PIUs will have fiduciary responsibilities for Component 3 and Component 4. Owner's engineers financed under Subcomponent 3.4 for each country will provide support to the implementation of project Component 3 and to the PIUs responsible for supervision of investments under this component. The owner's engineers will also validate the technical specifications for activities under the Component 3 before procurement packages are put out for bid.

At the national levels, a **Project Steering Committee (PSC)** under the supervision of the Ministry will be established and will include representatives of the MoF, National Utilities, Regulatory Commission, and other government stakeholders. The PSC will coordinate and oversee the project activities at national level.

National PIU in Grenada: The new PIU being established for the WB-financed Caribbean Efficient and Green Energy Buildings (CEGEB) project will be enhanced under the Grenada Ministry of Climate Resilience, the Environment and Renewable Energy (MCRERE) for the implementation of the Project's activities in Grenada. This will include a project coordinator for renewable energy and shared experts across energy sector projects -- an environmental specialist, a social specialist, a community liaison officer, a financial management specialist, and procurement specialist. A Grenada PSC will be created to include representatives, from the MOF, other relevant ministries, Public Utilities Regulatory Commission etc. to coordinate and oversee the project activities in Grenada.

National PIU in Saint Lucia: The existing PIU under the Saint Lucia Ministry of Infrastructure, Port, Transport, Physical Development and Urban Renewable (MIPTPDUR) will be leveraged with additional professional experts for the implementation of the project activities. For the project, a Project coordinator, an expert in Transmission and Distribution Planning and renewable energy, and shared experts across other energy sector projects -- an environmental specialist, a social specialist, a community liaison officer, a financial management assistant, and procurement assistant will be hired as needed. A PSC under the supervision of the Ministry in charge of the energy sector will be established which will include representatives of MOF, National Utilities Regulatory Commission, and other relevant agencies. The PSC will coordinate and oversee the project activities at country level.

A National PIU in Saint Vincent and the Grenadines. A dedicated national PIU will be established in the Energy unit in Ministry of Urban Development and Energy. This will include a Project coordinator along with an environmental specialist, a social specialist, a community liaison officer, a financial management specialist, and procurement specialist.

Project coordinators be responsible for ensuring the delivery of all project activities, including ensuring quality assurance and providing no objections to E&S documents such as Screening Forms and ESMPs as relevant.

Each PIU will also employ Environmental Specialist and Social Specialist. The ToRs for the Environmental Specialist and Social Specialist will be included in the Project Operations Manual. The E&S specialists will be responsible for the following:

- Generally, ensure that the ESMF is implemented in compliance with national legislation and the requirements of the WB's ESSs
- Ensure that the necessary environmental authorizations and permits are obtained
- Ensure compliance with occupational health and safety, social and environmental legislations, procedures, guidelines and specifications and to provide advice on measures needed to minimize hazards or unhealthy situations at project sites.
- Screening potential sub-projects by applying the exclusion list.
- Identify and report all key potential social and environmental impacts and risks of projects and ensure that their magnitude and significance are well understood.
- Determine the scope of environmental work and identify the risk category of the sub-projects
- Submit ESMPs and screening documents to the World Bank for approval
- Disclose sub-project ESMPs and other related plans
- Include the requirements and mitigation measures from ESMPs and LMP in the bidding documents and contractor contracts
- Conduct consultations with stakeholders in accordance with relevant polices and guidelines.
- Function as the project's Grievance Coordinator.
- Assessing, analyzing and collating environmental performance and gender related data and reporting information to the internal staff, clients and regulatory bodies.
- Supervise projects to ensure implementation of mitigation measures.
- Supervise and monitor on-the-ground implementation of sub-projects directly and through designated sub-project focal points
- Train contractors who will be responsible for implementing the ESMF, via C-ESMPs and other procedures
- Train sub-project focal points and others in sub-project communities on relevant environmental and social mitigation measures, roles, and responsibilities
- Ensure timely implementation of the actions agreed in the Environmental and Social Commitment Plan (ESCP).
- Send quarterly project progress reports to the WB
- Provide technical support to the PIU on environmental and social management-related issues.
- Liaise with relevant government agencies, development partners and other organizations on Project related matters which require environmental considerations.

The Social Specialist will also be the project's Grievance Coordinator. The Grievance Coordinator will receive and examine grievances at the PIU level, maintain a project-wide database of filed grievances and their redressal process, monitor the project activities of contractors and consultants on the management of grievances, and prepare quarterly progress reports on grievances received.

Designated CLOs for each sub-project will be responsible for several activities, including the following to support E&S mitigation:

- In coordination with the Social Specialist, conduct consultations for the sub-projects, documenting the consultations results and taking appropriate actions based on the consultations
- Track grievances and beneficiary feedback during project implementation
- To monitor implementation of project activities

- To monitor environmental and social mitigation measures using recommended indicators

Through stipulation in their contracts, contractors will comply with all the project's E&S risk management plans and procedures, including ESMPs, ESCOPs, the LMPs, and national legislation. Contractors will take all necessary measures to protect the health and safety of workers and community members, and avoid, minimize, or mitigate any environmental harm resulting from project activities. Contractors will also disseminate and create awareness within their workforce of environmental and social E&S risk management compliance for their effective implementation.

Proposed Training and Capacity Building

Successful implementation of the Project overall will depend among others on the effective implementation of the environmental and social risk management measures outlined in this ESMF. Training and capacity building will be necessary for the key stakeholders to ensure effective implementation of the ESMF and the SEP. Where specific needs in relation to compliance with the ESSs are identified, the PIUs and contractors will be trained. Training sessions will be done in various formats, including workshops, lectures, or hands-on activities in the field.

In addition to the capacity building that they will deliver directly, if any of the national PIUs determine that a contractor has inadequate legal or technical capacity to carry out key E&S assessment functions, they may require the contractor to include explicit measures related to capacity building. This could involve training for contractor workers and resources to employ or engage staff or consultants with relevant expertise, on, for instance, worker safety, waste management or grievance management.

An initial training approach is outlined in Table 10 below. To the extent possible, training on environmental and social risk management will be integrated into the project cycle and operational procedures. Given the need to raise awareness among project workers and stakeholders at many levels, a cascading model is proposed where information will follow from the national level to the field levels. This will be revised based on needs assessment and consultations. Training will continue throughout Project implementation.

Table 10 Proposed Training and Capacity Building Approach

Level	Responsible Party	Audience	Topics / Themes that may be covered
National Level	WB	National Staff responsible for overall implementation of ESMF/LMP	ESMF/LMP and approach: - Identification and assessment of E&S risks - Selection and application of relevant E&S risk management measures/instruments, especially preparation and implementation of the ESMPs - Monitoring of ESMP/C-ESMP implementation - Application of SEP and the grievance/beneficiary feedback mechanism - E&S monitoring and reporting - Incident and accident reporting - Stakeholder engagement and grievance management
Project level	PIU	PIU staff Supervision Consultant	- E&S risks and instruments developed under the Project

	E&S Specialists		- Incorporation of the E&S mitigation measures into the bidding documents - Monitoring of ECOPs/MSIP/C-ESMP implementation - Application of SEP and the grievance/beneficiary feedback mechanism - E&S reporting - Incident and accident reporting - Stakeholder engagement
Sub-project site level	Supervision Consultants/ PIU E&S Specialists	Contractors	- Implementation of the ECOPs/MSIP/C-ESMP - Application of LMP, including Code of Conduct, incident reporting, workers' grievance management, among other topics - Application of SEP and the grievance/beneficiary feedback mechanism - Environmental and social requirements, including ESHS requirements - Waste management - Occupation Health and safety for the workforce including emergency preparedness and response and use of PPE - Community health and safety - SEA/SH risk management
Sub-project site level/Community Level	CLOs	Community members	- Community health and safety issues - Grievance management

Estimated Budget

Based on the scope of the ESMF and proposed training needs of various staff, contractors, stakeholders, and community; the following are estimated cost items for the implementation for the ESMF, which have been included in the overall project budget:

Table 11 Estimated ESMF Implementation Budget*

GRENADA	
Activity / Cost Item	**Cost (USD)/Year**
Training for staff, contractors and sub-project focal points**	8,000
Field visits during sub-project preparation, implementation, and monitoring	5,200
Field visits to Carriacou and Petit Martinique (ferry round trip, accommodations)	500
Paraphernalia, training materials, brochures, and other promotional materials**	12,000
Miscellaneous expenses	5,000
TOTAL	**30,700**
SAINT LUCIA	
Activity / Cost Item	**Cost (USD)/Year**
Training for staff, contractors and sub-project focal points**	8,000
Field visits during sub-project preparation, implementation and monitoring	5,000
Paraphernalia, training materials, brochures, and other promotional materials**	12,000
Miscellaneous expenses	5,000
TOTAL	**30,000**
SAINT VINCENT AND THE GRENADINES	
Activity / Cost Item	**Cost (USD)/Year**

Training for staff, contractors and sub-project focal points**	8,000
Field visits during sub-project preparation, implementation and monitoring	5,200
Field visits to Grenadines (ferry round trip, accommodations)	500
Paraphernalia, training materials, brochures, and other promotional materials**	12,000
Miscellaneous expenses	5,000
TOTAL	**30,700**

*The budget is tentative and likely to change once the ESMF is further defined.
**This budget line is also covered in the SEP budget

Stakeholder Engagement, Disclosure and Consultations

As per the Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, separate Stakeholder Engagement Plans (SEPs) for Grenada, Saint Lucia and Saint Vincent and the Grenadines have been prepared for the Project (Grenada, Saint Lucia, Saint Vincent and the Grenadines). The overall objective of the SEPs is to define a program for stakeholder engagement, including public information disclosure and consultations throughout the entire project cycle. The SEPs generally detail ways in which the project team will engage with stakeholders and includes a grievance management mechanism by which stakeholders can raise concerns, provide feedback, or make complaints about any activities related to the project. Additionally, the SEPs outline activities that aim to proactively raise awareness and provide training on energy efficiency and resilience for the general public, sub-project site users and other relevant stakeholders.

At the sub-project level, ESMPs will include a section on stakeholder engagement including: (i) consultations for the preparation of site specific ESMP; (ii) stakeholder engagement to take place during implementation; and (iii) description of the grievance mechanism, including site-specific information for available channels and other adjustments. Any consultations at subproject level need to be well documented in the specific ESMP, including details on how stakeholder feedback is incorporated in the Project.

Initial consultations will discuss the Project's objectives and activities, the grievance management process, and specific interventions planned for each site and potential impacts and risks related to the proposed project activities. An initial draft of this ESMF will be disclosed along with the SEP via the Project's website, via email and WhatsApp groups, as well as in meetings. These first consultations will serve as an opportunity to gather feedback on other potential impacts and risks not yet identified. This feedback will be recorded and considered by project staff and a summary of the main recommendations received and to be integrated into the Stakeholder Engagement Plan will be provided in the respective SEPs.

ANNEX 1: EXCLUSION LIST

This list sets out key guidance to ensure sub-project eligibility.

Access to project and sub-project financing in support of any of the following activities listed in this annex are prohibited:

1. Uses of goods and equipment involving forced labour, child labour, or other harmful or exploitative forms of labour.
2. Purchase and use of formulated projects that fall in the World Health Organization classes IA and IB or formulations of products in class II if they are likely to be used by, or be accessible to, lay personnel, farmers or others without training, equipment, and facilities to handle, store and apply these products properly.
3. Financing of elections or election campaigning.
4. Funding salaries or salary supplements of government security personnel.
5. Purchase of firearms or other weapons.
6. Activities that contravene local laws related to purchase and consumption of tobacco, alcoholic beverages, and other drugs.
7. Manufacture of alcohol for local consumption and/or cultivation of crops for this purpose.
8. Activities carried out in relation to the adjudication of lands under dispute.
9. Purchase of land.
10. Activities that have potential to causes adverse impacts to critical habitat.
11. Activities that lead to conversion, deforestation or degradation of natural forests or other natural habitats, including, among others, conversion to agriculture or tree plantations.
12. Activities affecting protected areas (or buffer zones thereof).
13. Activities related to commercialization of illegal timber and non-timber forest products.
14. Construction and/or restoration of religious buildings
15. Removal or alteration of any physical cultural heritage property (includes sites having archaeological, paleontological, historical, religious, or unique natural values).
16. Uses of goods and equipment for military or paramilitary purposes.
17. Uses of goods and equipment in response to conflict, in any area with active military or armed group operations.

ANNEX 2: ENVIRONMENTAL AND SOCIAL SCREENING FORM

This form is to be filled out by the E&S Specialists for each of the sub-projects and used to guide ToRs for contractors. The form is required for assessment of potential adverse impacts of project activities and to assign a risk level for the site. (Section 6.1a).

1. **Subproject Information:**

Subproject Title/Location:	
Subproject Activities:	
Estimated Cost	
Start/Completion Date	
Screening Carried Out By:	

2. Environmental and Social Screening Questionnaires

Questions	Answer		Comments
	Yes	No	
ESS1			
Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' and exclusion?			If "Yes": Exclude from project.
Does the subproject involve renovation or rehabilitation/upgrading of any infrastructure?			If "Yes": Provide details to determine the level of risk.
Is the site close to a water body?			If "Yes": Provide details to determine the level of risk.
Will the subproject require clearing of vegetation?			If "Yes": Provide details to determine the level of risk.
Will the subproject be close to terrestrial/marine protected areas or sensitive area?			If "Yes": Provide details to determine the level of risk.
Will the subproject lead to sedimentation or soil erosion?			If "Yes": Provide details to determine the level of risk.
ESS2			
Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?			If "Yes": Exclude from project.
Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers?			If "Yes": Provide details to determine the level of risk.
Do workers need PPE relative to the potential risks and hazards associated with their work?			If "Yes": Provide details to determine the level of risk.
Is there a risk that women may be underpaid when compared to men when working on the project construction?			If "Yes": Provide details to determine the level of risk.

Does the project lead to any risks and impacts on, individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable.[3]			If "Yes": Provide details to determine the level of risk.
ESS3			
Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams, or groundwater?			If "Yes": Provide details to determine the level of risk.
Do any of the construction works involve the removal of asbestos or other hazardous materials related to construction works?			If "Yes": Provide details to determine the level of risk.
Are works likely to cause negative impacts to air and/or water quality?			If "Yes": Provide details to determine the level of risk.
Does the activity rely on existing infrastructure that is inadequate to prevent environmental impacts?			If "Yes": Provide details to determine the level of risk.
Does the activity require civil works to support project activities?			If "Yes": Provide details to determine the level of risk.
Does the activity require the use of pesticides, mildewcides or other chemicals?			If "Yes": Provide details to determine the level of risk.
Is there a potential that the works will involve sites that are affected by issues related to mold?			If "Yes": Provide details to determine the level of risk.
Could the construction activities be a nuisance to other activities at the site, such as from dust, noise, construction vehicles etc.?			If "Yes": Provide details to determine the level of risk.
ESS4			
Is an influx of workers, from outside the community, expected?			If "Yes": Provide details to determine the level of risk.
Could the construction activities be a nuisance to community members, such as dust, noise, traffic etc.?			If "Yes": Provide details to determine the level of risk.
Could the construction activities disrupt the primary use of the site?			If "Yes": Provide details to determine the level of risk.
ESS5			
Does the subproject involve involuntary land acquisition?			If "Yes": Provide details.
Does the subproject involve physical and/or economic displacement of people?			If "Yes": Provide details.
ESS6			
Do project activities do not alter or cause destruction to critical or sensitive natural habitats?			If "Yes": Provide details to determine the level of risk.
ESS8			
Will the subproject involve any civil works that could involve demolition, renovations, or refurbishment to a historical or archaeological or culturally significant site or facility?			If "Yes": Provide details to determine the level of risk.

Conclusion

Based on the result from the screening, what is the risk level for the subproject? _____

[3] "Disadvantaged or vulnerable" refers to those individuals or groups who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or ethnic peoples status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits.

ANNEX 3: ENVIRONMENTAL AND SOCIAL CODES OF PRACTICE (ESCOPs) FOR INFRASTRUCTURE SUBPROJECTS

To manage and mitigate potential negative environmental impacts, the project applies Environmental and Social Codes of Practice (ESCOPs); outlined in this document. The ESCOPs contain specific, detailed, and tangible measures that would mitigate the potential impacts of each type of eligible subproject activity under the project. They are marked as relevant for the planning phase, the implementation phase, or the post-implementation phase of activities. They are intended to be simple risk mitigation and management measures, readily usable to the PIUs and contractors.

Issue	Environmental Prevention/Mitigation Measures
1. In general	a) Provide adequate drainage in the building's immediate surroundings to avoid standing water, insect related diseases (malaria, etc.) and unsanitary conditions. (Implementation phase) b) Include sanitary facilities such as toilets and basins for handwashing. (Implementation phase) c) Restrict use of asbestos cement tiles as roofing. (Implementation phase) d) Tiled floors are preferred for easier cleaning and more hygienic. (Planning and implementation phases)
2. Noise during construction	a) Plan activities in consultation with communities so that noisiest activities are undertaken during periods that will result in least disturbance. b) Use when needed and feasible noise-control methods such as fences, barriers, or deflectors (such as muffling devices for combustion engines). c) Minimize project transportation through community areas where possible. Maintain a buffer zone (such as open spaces, row of trees or vegetated areas) between the project site and residential areas to lessen the impact of noise to the living quarters. d) Repair and maintain machineries for safe and quiet operation.
3. Soil erosion	Protect slopes from erosion and landslides by the following measures (Implementation phase): a) Indigenous Species, fast-growing grass on slopes prone to erosion. These grasses help stabilise the slope and protect soil from erosion by rain and runoff. Locally available species possessing the properties of good growth, dense ground cover and deep root shall be used for stabilisation. b) Provide interceptor ditch, particularly effective in the areas of high intensity rainfall and where slopes are exposed. This type of ditch intercepts and carries surface run-off away from erodible areas and slopes before reaching the steeper slopes, thus reducing the potential surface erosion. c) For steep slopes, a stepped embankment (terracing) is needed for greater stability. d) Place a retaining wall at the lower part of the unstable slope. The wall needs to have weeping holes for drainage of the road sub-base, thus reducing pressure on the wall. e) Rocks (riprap) can be used in addition to protect the slope.
4. Soil Pollution	a) Storage for hazardous materials should be above ground and isolated. b) Establishing an appropriate disposal area for hazardous materials and waste which prevents hazardous material from leaching into the soil and surface water.
5. Air quality	a) Minimize dust from exposed work sites by applying water on the ground regularly during dry season. b) Reduce dust generation through application of water where practical. c) Avoid burn site clearance debris (trees, undergrowth) or construction waste materials. d) Keep stockpile of aggregate materials covered to avoid suspension or dispersal of fine soil particles during windy days or disturbance from stray animals. e) Reduce the operation hours of generators /machines /equipment /vehicles as much as possible. f) Control vehicle speed when driving through community areas is unavoidable so that dust dispersion from vehicle transport is minimized. g) Limit idling of vehicles, machineries equipment.
6. Water quality and availability	a) Activities should not affect the availability of water for drinking and hygienic purposes. b) No soiled materials, solid wastes, toxic or hazardous materials should be poured or thrown into water bodies for dilution or disposal.

		c) Avoid the use of wastewater pools particularly without impermeable liners. d) Provision of toilets with temporary septic tank. e) Separate as best as possible concrete works in waterways and keep concrete mixing separate from drainage leading to waterways. f) Avoid any activity causing excessive erosion and turbidity. g) Keep waste and hazardous materials away from surface water bodies, drinking water sources and do not dispose of waste in creeks or rivers. h) Properly dispose contaminated wastewater and hazardous materials, if any, passing through conventional treatment process such as screening, settling, oil-water separation, etc.
7.	Pest Control	For pest management, conduct a site-specific pest (insect and rodent) assessment, prepare a pest control plan, procure and utilize relevant insect and rodent control equipment, as well as procure and apply relevant pest management measures.
8.	Solid and hazardous waste	a) Segregate construction waste as recyclable, hazardous and non-hazardous waste. b) Reuse and recycle appropriate and viable materials. c) Collect, store and transport construction waste to appropriately designated/ controlled dump sites, where possible. d) On-site storage of waste prior to final disposal needs to be located on hard-standing areas and should be at least 300 metres from rivers, streams, lakes, and wetlands, where possible. e) Train workers on correct transfer and handling of fuels and other substances and require the use of gloves, boots, aprons, eyewear, and other protective equipment for protection in handling highly hazardous materials. f) Collect and properly dispose of small amount of maintenance materials such as oily rags, oil filters, used oil, etc. Never dispose spent oils on the ground and in water courses as it can contaminate soil and groundwater (including drinking water aquifer). g) Waste depots/storage/disposal should be contained, sealed and/or roofed/covered to prevent storm water contamination. Wastes need to be emptied regularly. h) After each construction site is decommissioned, all debris and waste shall be cleared.
9.	Asbestos	a) If asbestos or asbestos containing materials (ACM) are found at a construction site, they should be clearly marked as hazardous waste. b) When possible, the asbestos should be appropriately contained and sealed to minimize exposure. c) Prior to removal, if removal is necessary, ACM should be treated with a wetting agent to minimize asbestos dust. d) If ACM is to be stored temporarily, it should be securely placed inside closed containers and clearly labeled. e) Removed ACM must not be reused. f) Dispose ACM as per national regulations and procedures
10.	Worker and Community Health and Safety	a) When planning activities of each subproject, discuss steps to avoid people getting hurt. (Planning phase) It is useful to consider: • Construction place: Are there any hazards that could be removed or should warn people about? • The people who will be taking part in construction: Do the participants have adequate skill and physical fitness to perform their works safely? • The equipment: Are there checks you could do to make sure that the equipment is in good working order? Do people need any skills or knowledge to enable them to use it safely? • Electricity Safety: Do any electricity good practices such as use of safe extension cords, voltage regulators and circuit breakers, labels on electrical wiring for safety measure, aware on identifying burning smell from wires, etc. apply at site? Is the worksite stocked with voltage detectors, clamp meters and receptacle testers? b) Mandate the use of personal protective equipment for workers as necessary (gloves, dust masks, hard hats, boots, goggles). (Implementation phase) c) Follow the below measures for construction involve work at height (e.g. 2 meters above ground (Implementation phase): • Do as much work as possible from the ground. • Do not allow people with the following personal risks to perform work at height tasks: eyesight/balance problem; certain chronic diseases – such as osteoporosis, diabetes,

	arthritis, or Parkinson's disease; certain medications – sleeping pills, tranquillisers, blood pressure medication or antidepressants; recent history of falls – having had a fall within the last 12 months, etc. • Only allow people with sufficient skills, knowledge, and experience to perform the task. • Check that the place (e.g. a roof) where work at height is to be undertaken is safe. • Take precautions when working on or near fragile surfaces. • Clean up oil, grease, paint, and dirt immediately to prevent slipping; and • Provide fall protection measures e.g. safety hardness, simple scaffolding/guard rail for works over 4 meters from ground. d) Keep worksite clean and free of debris on daily basis. (Implementation phase) e) Provision of first aid kit with bandages, antibiotic cream, etc. or health care facilities and enough drinking water. (Implementation phase) f) Keep corrosive fluids and other toxic materials in properly sealed containers for collection and disposal in properly secured areas. (Implementation phase) g) Ensure adequate toilet facilities for workers from outside of the community. (Implementation phase) h) Rope off construction area and secure materials stockpiles/ storage areas from the public and display warning signs including at unsafe locations. Do not allow children to play in construction areas. (Implementation phase) i) Ensure structural openings are covered/protected adequately. (Implementation phase) j) Secure loose or light material that is stored on roofs or open floors. (Implementation phase) k) Keep hoses, power cords, welding leads, etc. from laying in heavily travelled walkways or areas. (Implementation phase) l) If school children are in the vicinity, include traffic safety personnel to direct traffic during school hours, if needed. (Implementation phase) m) Control driving speed of vehicles particularly when passing through community or nearby school, health center or other sensitive areas. (Implementation phase) n) During heavy rains or emergencies of any kind, suspend all work. (Implementation phase) o) Fill in all earth borrow-pits once construction is completed to avoid standing water, water-borne diseases, and possible drowning. (Post-Implementation phase)
11. Other	a) No cutting of trees or destruction of vegetation other than on construction site. [Implementing agency] will procure locally sourced materials consistent with traditional construction practices in the communities. (Planning phase) b) No hunting, fishing, capture of wildlife or collection of plants. (Implementation phase) c) No use of unapproved toxic materials including lead-based paints, un-bonded asbestos, etc. (Implementation phase) d) No disturbance of cultural or historic sites. (Planning and implementation phases)

ANNEX 4: ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) TEMPLATE

Based on the requirements laid out in the ESMF, the ESMP should describe the mitigation, monitoring, and institutional measures to be taken during sub-project implementation and operation to eliminate adverse environmental and social risks and impacts. The ESMP should also include the measures and actions needed to implement these measures (see Section 6.1b).

The individual mitigation and monitoring measures and actions and the institutional responsibilities relating to each, as well as the related costs should be integrated into the project's overall planning, design, budget, and implementation. The ESMP should be incorporated in all legal documents (summarized and incorporated in the bidding and contract documents) to enforce compliance by all contractors participating in the project. This document will be prepared by the E&S Specialists.

1. Sub-project Site Description and Scope of Works

This section summarizes the subproject: it describes the proposed location and its geographic, ecological, social, and temporal context including any offsite investments that may be required (e.g., access roads, water supply, etc.) and sufficiently detailed maps showing the project site and the area that may be affected by the project's direct and indirect impacts.

2. Legal and Administrative Framework

This section gives a summary of relevant national and local laws and regulatory requirements that are applicable to the specific works, including permit and licensing requirements. It should also include the applicable World Bank ESSs (Environmental and Social Standards) and a section on the relevant EHSGs (Environmental, Health and Safety Guidelines).

3. E&S Impacts and Mitigation Measures

The section should identify and summarize all anticipated adverse environmental and social risks and impacts, describe with technical details each mitigation measure to address these risks and impacts (attach designs, equipment descriptions, and operating procedures, as needed); and 3), list the General Conditions of Contract (GCC)/Particular Condition of Contract (PCC)/contract references to facilitate inclusion into bidding and contracting documents.

To inform ESMP preparation, general mitigation measures based on potential impacts are given in Table 6 of the ESMF. These measures can be complemented with others that are considered relevant for the specific E&S potential impacts of works at the subproject.

For those risks identified with the greatest potential negative impacts and which would require special attention, additional planning or monitoring; during the bidding phase, the contractor will need to provide Management Strategies and Implementation Plans (MSIPs) to address key risks or impacts identified and these should be listed below.

E&S Aspect	Potential Impacts	Mitigation Measures	Comments/Relevant GCC

4. Monitoring

This section should describe the process for monitoring the project's potential environmental and social impacts, by highlighting the monitoring methods which will be utilized, the parties responsible for monitoring and the resulting actions and indicators for environmental and social management.

Potential Impacts	Monitoring Methods	Responsible Parties	Resulting Actions	Indicators

5. Implementation Arrangements

This section describes the roles and responsibilities of relevant agencies or ministries, the PIU management team, the PIU E&S Specialist, the Design and Supervision Consultant, and the Contractor. Include an organizational diagram as it applies to these actors on the Project.

6. Capacity Development & Training

Based on the implementation arrangements and responsible parties proposed above, this section outlines any capacity building, training or new staffing that may be necessary for effective implementation.

7. Sub-project Site Specific Stakeholder Engagement

This section will detail a summary of consultations undertaken during subproject preparation, a description of how stakeholder engagement will take place during subproject implementation and how the Project's grievance mechanism is implemented in the sub-project context.

8. Implementation Schedule and Cost Estimates

For all three aspects (mitigation, monitoring, and capacity development), the ESMP should include (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates for implementing the ESMP. These figures should be integrated into the total project cost tables.

9. Attachments

Any site-specific plan required, such as a community health and safety plan; waste management plan; and traffic management plan, resettlement plan, sub-project site specific SEP (See Annex 9 for guidance on some of these plans)

ANNEX 5: LABOR MANAGEMENT PROCEDURES (LMP)

In accordance with the requirements of World Bank's Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions, this simplified LMP has been developed for the project. The LMP sets out the ways in which the PIUs in Grenada, Saint Lucia and Saint Vincent and the Grenadines will manage all project workers in relation to the associated risks and impacts. The objectives of the LMP are to:

- Identify the different types of project workers that are likely to be involved in the project;
- Identify, analyze, and evaluate the labor-related risks and impacts for project activities; and
- Provide procedures to meet the requirements of ESS2 on Labor and Working Conditions and applicable national legislation.

The Labor Management Procedures apply to all project workers, irrespective of contracts being full-time, part-time, temporary, or casual. The types of workers that will be included in the project are listed below:

- **Direct workers** have a directly contracted employment relationship with Borrower governments. Direct workers are employed or engaged by the Borrower, paid directly by the Borrower, and subject to the Borrower's day-to-day instruction and control. The Ministry staff in Grenada, Saint Lucia and Saint Vincent and the Grenadines who will be engaged in the project activities are civil servants and will remain subject to the terms and condition of their public sector employment. These types of workers include persons employed or engaged by the PIUs to carry out design and supervision, monitoring and evaluation, or community engagement in relation to the project. The PIUs would be supported by external consultants as necessary for specific tasks. The PIUs will procure the services of preparatory consultancies, vendors, or construction firms to execute works, and final certification of buildings.

- **Contracted workers** are workers employed or engaged by a third party to perform work or provide services related to the core functions of the project, where the third-party exercises control over the work, working conditions, and treatment of the project worker. 'Core functions' of a project constitute those production and/or service processes essential for a specific project activity without which the project cannot continue. In such circumstances, the employment relationship is between the third party and the project worker, even if the project worker is working on an ongoing basis on project activities. Contracted Workers will be subject to ESS2 requirements. Contracted workers include workers hired by contractors based on their level of skills and subproject needs, such as through preparatory consultancies (investment-grade energy audits and project designs), vendors or constructing firms to execute works, and final certification of buildings.

Labor Risks

The following potential labor risks are identified under the project:

- Workplace injuries and accidents, particularly when operating construction equipment, when working at height on building construction, and when handling heavy equipment and materials
- Risks from exposure to hazardous substances (dust, cement, chemicals used in construction etc.)
- Conflicts between workers and communities
- Terms and conditions of employment of workers may not be consistent with national legislation and WB standards

- Non-discrimination and equal opportunity of workers may not be consistent with national legislation or WB standards

Relevant National Labor Legislation

In each of these jurisdictions, ESS2 requirements and relevant labour laws are those related to conditions of employment (e.g., minimum wage, hours of work, minimum age, vacation and sick pay, maternity leave, dismissals, social security payments, etc.), anti-discrimination (i.e., protection from discrimination on the grounds of protected characteristics), industrial relations (e.g., trade union establishment, collective bargaining, arbitration of disputes, etc.) and occupational health and safety (OHS). The key aspects of national policies and legislation related to these are summarized in the following table and discussed below in greater detail.

Summary of National Legal Frameworks related to ESS2

ESS2 requirement	Gaps between legislation and ESS2	Mitigation measures
Conditions of employment ESS2 identifies the minimum age as the higher of 14 or the age prescribed by national law. ESS2 requires that no child under the age of 18 may be employed or engaged in connection with work that is likely to be hazardous, interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development. The response to hiring below the legal minimum age will be termination of employment.	Each of the project countries establishes a minimum legal age for employment of 14 or older: age 16 in Grenada, 15 in Saint Lucia and 14 in Saint Vincent and the Grenadines In three Project countries, there are gaps in the legal protections given to children under the age of 18 from involvement in hazardous work.	Children under the age of 18 can be employed or engaged only where permitted by law and only in exceptional circumstances, as set out in ESS2. Hiring of workers under the age of 18 will be subject to rigorous scrutiny and by no means can they be exposed to hazardous activities.
Anti-discrimination and SEA/SH ESS2 requires that decisions relating to the employment or treatment of project workers not be made on the basis of personal characteristics unrelated to inherent job requirements (e.g., gender, race, religion, sexual orientation) but be based on the principle of equal opportunity and fair treatment.	Anti-discrimination legislation, in one form or another, exists in Project countries. General guarantees of equality are provided in the constitution. The protected categories defined by law are not, however, always as comprehensive as those required by ESS2. For instance, while discrimination on the grounds of race, religion, place of origin or sex is prohibited in all countries, such protections are not universal for age, disability and, especially, sexual orientation. All Project countries have legislation that criminalizes SEA/SH.	The Project will implement workplace policies that meet the requirements of ESS2 in relation to anti-discrimination. These will be included in the CoC which will be a part of the contract for all project workers.
Industrial relations ESS2 respects the role of legally established workers' organizations and legitimate workers' representatives. These will be provided with information needed for meaningful negotiation in a timely manner.	Freedom of assembly, freedom of association, collective bargaining and industrial relations are guaranteed through the Constitutions and regulated through the labour relations legislation in all Project countries. These include Grenada's Labour Relations Act, Saint Lucia's Labor Act and Saint Vincent and the Grenadines' Labour Market Policy	The LMP and associated CoC will be shared with employers and workers' organizations.

ESS2 requirement	Gaps between legislation and ESS2	Mitigation measures
Occupational health and safety ESS2 imposes general requirements related to occupational health and safety to all project workers.	Legislation and regulations necessary to develop and implement procedures to establish and maintain a safe working environment, including that workplaces, vehicles, equipment, and processes under their control are safe and without risk to health are adequate. The level of awareness of the importance of OHS issues among employers and workers may be limited.	Information dissemination and awareness raising regarding the LMP will be prioritized from project inception and designed to reach all project workers.

Labor Relations and Occupational Health and Safety Legislation in Grenada

The overarching major national labor legislation in Grenada is the Employment Act of 1999 which regulates the terms and conditions of employment and contains provisions on the establishment and functions of the Department of Labor. The guiding principles reside on the prohibition of forced labor, discrimination, equal pay for equal works, as well as remedies for infringements of rights. The Employment Act strictly prohibits discrimination of employees based on race, color, national extraction, social origin, religion, political opinion, sex, marital status, family responsibilities or disability. An employee also has the right, by law, to remove himself or herself from a work situation which he or she reasonably believes presents an imminent or serious danger to life or health.

The Employment Act makes it mandatory for employers to furnish employees with written particulars of employment, stating hours of work, wages, leave entitlements, job description, grievance procedures, benefits, among others. Specifically, Part VI deals with the matter of hours of work and continuity of employment and will apply to the risk of extended hours of work as perceived as a minor risk to the project. Part VII speaks to Protection and Regulation of wages, Part VIII - Leave entitlements and other benefits and Part IX expounds on discipline and termination of employment.

The Factories Act is the main law governing occupation safety and health, and there are a number of detailed regulations developing the main Act, including the Factories (Sanitary Accommodation) Regulations, Factories (Welfare) Regulations, Factories (Electricity) Regulations, and Factories (Lifting Tackle) Regulations.

Under the Occupational Safety and Health Convention, 1981 (No. 155), 155, the Government of Grenada takes account of the following main spheres of action in so far as they affect occupational safety and health and the working environment:

(a) design, testing, choice, substitution, installation, arrangement, use and maintenance of the material elements of work (workplaces, working environment, tools, machinery and equipment, chemical, physical, and biological substances and agents, work processes);

(b) relationships between the material elements of work and the persons who carry out or supervise the work, and adaptation of machinery, equipment, working time, organization of work and work processes to the physical and mental capacities of the workers;

(c) training, including necessary further training, qualifications and motivations of persons involved, in one capacity or another, in the achievement of adequate levels of safety and health;

(d) communication and co-operation at the levels of the working group and the undertaking and at all other appropriate levels up to and including the national level;

(e) the protection of workers and their representatives from disciplinary measures because of actions properly taken by them in conformity with WB ESS policy.

Grenada National Labor Legislation

Legislation	Description
Employment Act of 1999	Regulates the terms and conditions of employment and contains provisions on the establishment and functions of the Department of Labour
The Factories Act of 1973	The main law governing occupation safety and health implemented by means of a number of detailed regulations.
The Accidents and Occupational Diseases (Notification) Act, 1951	Regulates notification of accidents and occupational diseases.
Right of Association (Agriculture) Convention, 1921 (No. 11)	Under the Convention, the Government of Grenada commits to ensure that all those engaged in agriculture enjoy the same rights of association and combination as industrial workers, and to repeal any statutory or other provisions restricting such rights.
Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)	Grants nationals of any other signatories who suffer personal injury due to industrial accidents happening in its territory, or to their dependants, the same treatment in respect of workers' compensation as it grants to its own nationals.
Occupational Safety and Health Convention, 1981 (No. 155)	Commits signatories to formulate, implement and periodically review a coherent national policy on occupational safety, occupational health, and the working environment, to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Labor Relations and Occupational Health and Safety Legislation in Saint Lucia

One primary piece of legislation guides and regulates the terms and conditions of employment in Saint Lucia. Saint Lucia Labour Act No. 37 of 2006 makes it mandatory for employers to provide employees with written details of employment stating hours of work, leave entitlement, job description, grievance procedures, benefits, health, and safety, etc. Within this legislation there are provisions relating to: Fundamental principles of employment-Part II; Contracts of employment-Division 1; Hours of Work-Division 3; Wages and minimum wages-Division 4 & 5; Leave entitlements (annual leave, sick leave, maternity leave, bereavement leave, etc.)-Divisions 6, 7 and 2; Employment of Children and Young persons-Division 9; Termination of Employment-Division 10; Duties of Employers, workers and other persons-Part IV Division; Occupational Health and Safety-Part IV; Equality of opportunity and treatment in employment-Part V Division 1,Trade Unions and employers organizations-Part VII.

Part II of the Labour Act under Fundamental Principles of Employment (Division 7) states that “an employer shall not discriminate against any employee on the grounds of race, colour, sex, religion, national extraction, social origin, ethnic origin, political opinion or affiliation, age, disability, serious family responsibility, pregnancy, marital status or HIV/AIDS, in respect of recruitment, training, work facilities or service, promotion, terms and conditions of employment or benefit arising out of the employment relationship”. The Code also makes provision on how the matter of discrimination can be addressed.

Project workers will be paid on a regular basis as required by national law and labour management procedures. Deductions from payment of wages will only be made as allowed by national law or the labour management procedures, and project workers will be informed of the conditions under which such deductions will be made. Project workers will be provided with adequate periods of rest per week, annual holiday and sickness, maternity, and family leave, as required by national law and labour management procedures.

Part four of the Saint Lucia Labour Act speaks to occupational health and safety in the workplace. Under Part Four, Divisions 1-4 provides for preventative health measures, protective devices and equipment, medical examinations, notification of employment injuries and diseases, and training. The Labour Act obligates the employer to ensure the safety and health of all employees and to mitigate the risk of exposure to any hazards in the work environment. Division three of the Act clearly outlines the procedures to be followed in relation to notification of accidents, occupational diseases, and other diseases. Division four specifically speaks to the responsibilities of employers, employees, and other people in adhering to health and safety regulations. The Act also clearly outlines the circumstances where employees may refuse to work on health and safety grounds and the procedures for how such matters should be addressed.

Saint Lucia National Labour Legislation

Legislation	Description
Labour Act of Saint Lucia (Amended 2006)	Establishes fundamental principles of employment, including with regards to terms and conditions, occupational health and safety, equal opportunities, and industrial relations. The Act prohibits employment of children and young people below the minimum school leaving age.
Saint Lucia Education Act (1999)	Sets the minimum school leaving age as 15.

Labour Relations and Occupational Health and Safety Legislation in Saint Vincent and the Grenadines

The Constitution of Saint Vincent and the Grenadines protects a number of rights related to work, including freedom of association, protection from forced labor, non-discrimination, fundamental right, and property rights. The country has also ratified several International Labour Organization (ILO) Conventions that cover core labor rights and principles. These include the Forced Labour Convention, the Freedom of Association Convention, and the Right to Organize Convention.

The country also has the OSH Act, which gives employees rights related to workplace safety and health. These rights include the right to work in a safe environment, the right to receive information and training on workplace health and safety, the right to report hazards without fear of reprisal and the right to refuse to perform work that is unsafe or unhealthy.

Saint Vincent and the Grenadines' Labour Code Act (2001) establishes a framework for labor rights and responsibilities. It covers issues such as:

- Working hours: General workers work 8 hours per day and 48 hours per week. Agricultural workers can work up to 9 hours per day if they are sheltered, and 6 hours per day if they are unsheltered. Domestic workers without living accommodations can work up to 10 hours per day, including 2 hours for rest.
- Safety and health: The act covers occupational safety and health.
- Dispute resolution: The act includes mechanisms for resolving disputes.
- Trade unions: The act provides the legal framework for the registration and operation of trade unions

Saint Vincent and the Grenadines National Labor Legislation

Legislation	Description
Wages Councils Act, 1953	This Act provides for the establishment of wages councils and the making of wages council orders

Legislation	Description
Trade Unions Act, 1950	This Act provides for the establishment and regulation of trade unions and addresses other matters such registration, rules, use of funds, and accounts.
Trade Disputes (Arbitration and Inquiry) Act, 1940	This Acts provides for the establishment of an arbitration tribunal and a board of inquiry in connection with trade disputes and to make provision for the settlement of such disputes, and for the purpose of enquiring into economic and industrial conditions in St. Vincent and the Grenadines.
Shop (Hours of Opening and Employment) Act, 1942	This Act regulates the opening hours of shops and other premises licensed for the sale of intoxicating liquor, and the limitation of the hours of employment in certain cases.
Recruiting of Workers Act, 1940	This Act provides for the recruitment and treatment of workers from St. Vincent and the Grenadines to work overseas under a licensing system
Protection of Employment Act, 2003	This Act provides for the maintenance and promotion of good employment relationships between employers and employees. It also addresses matters of severance and settlement of disputes.
Essential Services Act, 1965	This Acts provides for the maintenance of essential services and the regulation of the employment of workers therein
Equal Pay Act, 1994	This Act provides for the removal and prevention of discrimination, based on the sex of the employee, in the rates of remuneration for males and females in paid employment, and for all incidental matters.
Employment of Women, Young Persons and Children Act, 1935	This Act regulates the employment of women, young persons and children in industrial undertakings and on ships in accordance with the following International Labour Organisation (ILO) Conventions: Minimum Age (Industry) Convention (Revised) 1937; Night Work of Young Persons (Industry) Convention 1919; and the Night Work (Women) Convention 1941
Employment of Foreign Nationals and Commonwealth Citizens Act, 1973	This Act regulates the employment of foreign nationals and Commonwealth citizens in Saint Vincent and the Grenadines.
Employment Exchanges Act, 1956	This Act provides for the establishment and maintenance of employment exchanges for collecting and providing information in order to facilitate employment either locally and/or abroad.
Employers and Servants Act, 1937	This Act requires wages to be paid by the employer to the worker only in money and the payment of wages is to be made at intervals not exceeding fourteen days.
Accidents and Occupational Diseases (Notification) Act, 1952	This Act places a legal obligation on the employer to inform the Labour Commissioner in writing on the prescribed form, any accident involving any worker that arises out of and in the course of employment and which causes loss of life or serious bodily injury or disables a worker. The employer is also obligated to inform the Labour Commissioner on any occupational disease which he reasonable believes or suspects to have occurred among workers employed by him.
National Insurance Act	The National Insurance Act of Saint Vincent and the Grenadines establishes the framework for the National Insurance Scheme (NIS), which provides social security benefits, including pensions, sickness, maternity, and other related benefits to workers. It mandates that both employers and employees contribute a percentage of earnings to the scheme, with the employer matching the employee's contribution. The Act covers all employees and self-employed individuals, with specific contribution rates and income ceilings. Contributions are made weekly, fortnightly, or monthly, depending on the employment arrangement. The Act also outlines penalties for non-compliance, aiming to ensure financial protection for workers in times of need.

General Applicable Procedures

The PIUs and contractors will apply the following guidelines when dealing with workers:

- There will be no discrimination with respect to any aspects of the employment relationship, such as: recruitment and hiring; compensation (including wages and benefits); working conditions and

terms of employment; access to training; job assignment; promotion; termination of employment or retirement; or disciplinary practices.

- Harassment, intimidation and/or exploitation will be prevented or addressed appropriately.
- Special measures of protection and assistance to remedy discrimination or selection for a particular job will not be deemed as discrimination.
- Vulnerable project workers will be provided with special protection, as stipulated in national legislation to avoid discrimination.
- The PIUs and contractors will provide job / employment contracts with clear terms and conditions including rights related to hours of work, wages, overtime, compensation and benefits, annual vacation (holiday) and sick leave, and maternity leave. The Code of Conduct included in this LMP will be applicable for all project workers.
- The PIUs will ensure compliance with the Code of Conduct including providing briefings/awareness raising on the Code.
- The PIUs and contractors will ensure compliance with occupational health and safety procedures and procedures specific to communicable diseases (see below) including that the workers are trained in the application of standards that are relevant to the work.
- The PIUs and retained contractors will ensure no person under the age of 18 shall be employed.
- The PIUs will recruit contractors and labor locally to the extent that they are available.
- Workers shall be recruited voluntarily, and no worker is forced or coerced into work.
- The PIUs will supervise and monitor to ensure compliance with the above requirements.
- All workers will be made aware of the Worker's Grievance Mechanism (see below) to raise work related grievances, including any sensitive and serious grievances on SEA/SH.

Occupational Health and Safety (OHS) Procedures

The objective of the procedure is to achieve and maintain a healthy and safe work environment for all project workers (contracted workers and community workers) and the host community.

- On procurement for contractors, the PIUs will provide the ESMF to aspiring contractors so that contractors include the budgetary requirements for OHS and community health and safety measures in their respective bids.
- The contractor will develop and maintain an OHS management system that is consistent with the scope of work, duration of contract and this LMP.
- Contractors will adopt all E&S risk mitigation measures proposed for the subproject.
- Contractor designates a responsible person to oversee OHS related issues at the project site.
- Contractors will provide preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances informed by assessment and plan.
- Contractor provides appropriate training/induction of project workers and maintenance of training records on OHS subjects.
- Contractors will document and report on occupational accidents, diseases, and incidents as per ESMF guidance.
- Contractors will provide emergency prevention and preparedness and response arrangements to emergency situations including and not limited to workplace accidents, workplace illnesses, flooding, fire outbreak, disease outbreak, labor unrest and security.
- Contractors shall maintain all such records for activities related to safety, health, and environmental management for inspection by the PIUs or the World Bank.

Procedures for Communicable Diseases

Contractors will follow national protocols on communicable diseases (such asCOVID-19), including providing workers with appropriate forms of personal protective equipment (PPE) when needed. Many of the work under the Project will take place at sub-project sites that do not require the use of face masks. However, medical facilities such as hospitals and medical stations may still require the use of face masks. Workers at these sites must follow the requirements of each sub-project site related to communicable diseases.

Contractor Management Procedures

The objective of this procedure is to ensure that the PIUs have contractual power to administer oversight and action against contractors for non-compliance with the LMP.

- The PIUs will make available relevant documentation to inform the contractor about requirements for effective implementation of the LMP.
- Before submitting a bid for any contract, the contractor shall incorporate the requirements of the ESMF, including the LMP.
- Contractor will raise worker awareness on the Code of Conduct.
- Contractor will show evidence of OHS and Emergency Preparedness procedures.
- The PIUs will monitor contract's E&S performance during its regular site visits utilizing contractor reporting where available. *Where appropriate, the PIUs may withhold contractor's payment until corrective action(s) is/are implemented on significant non-compliance with the LMP, such as failure to notify the PIUs of incidents and accidents.*

Procedures for Primary Suppliers

The objective of the procedure is to ensure that labor-related risks, especially child and forced labor as well as serious safety issues to the project from primary supply workers are managed. To help Project countries benefit from economies of scale in procuring the necessary equipment, the RCU will provide a pooled procurement service to the Project. The RCU, PIUs and all contractors will undertake the following measures:

- Procure supplies from legally constituted suppliers.
- To the extent feasible, conduct due diligence to ensure that primary suppliers conduct age verifications, employ workers without any force or coercion, and maintain basic OHS systems.

Under ESS2, where there appears to be a significant risk of forced labor related to primary supply workers, the RCU will require the primary supplier to identify those risks and if forced labor cases are identified and will require the primary supplier to take appropriate steps to remedy them. Ultimately, where remedy is not possible, the RCU will, within a reasonable period, shift the project's primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements of ESS2.

Prior to beginning the procurement process, the RCU will undertake market analysis on equipment such as solar panels to identify the possible providers to the project. The bidding documents for solar panels and components will emphasize forced labor risks and will require that suppliers to the Project will not engage or employ any forced labor among their work force. Bidders will be required to provide two

declarations: a Forced Labor Performance Declaration (which covers past performance), and a Forced Labor Declaration (which covers future commitments to prevent, monitor and report on any forced labor, cascading the requirements to their own sub-contractors and suppliers). In addition, enhanced language on forced labor will be included in the procurement contracts. The Bank will prior review procurements of solar panels and components to ensure that enhanced provisions are used by the Borrower.

Throughout all stages of project implementation, the RCU will provide TA and capacity building to all stakeholders involved in the procurement process, particularly energy ministries, regulatory authorities, and utilities.

Institutional Arrangement for Implementation of the LMP

The PIUs will carry the main responsibility for the implementation and monitoring of the LMP. The Social Specialist will take the lead and, in coordination with the Environmental Specialist, will ensure that labor management procedures are integrated into the procurement of contracts and bidding processes.

Grievance Mechanism

There will be a specific Workers Grievance Mechanism (Worker GM) for project workers as per the process outlined below. This considers culturally appropriate ways of handling the concerns of direct and contracted workers. Processes for documenting complaints and concerns have been specified, including time commitments to resolve issues. Workers will be informed about the relevant Worker GM upon their recruitment and their right to redress, confidentiality, and protection against any reprisals from the employer will be stated in the contract.

Routine Grievances: The process for the Worker GM is as follows:

- Any worker may report their grievance in person, by phone, text message, mail, or email (including anonymously if required) to the contractor and/or a designated grievance manager at the contractor level as the initial focal point for information and raising grievances. For complaints that were satisfactorily resolved by the aggrieved worker or contractor within one week of receipt of complaint, the incident and resultant resolution will be logged and reported monthly to the Grievance Coordinator within the PIUs.
- If the grievance is not resolved within one week, the contractor (or the complainant directly) will refer the issue to the Grievance Coordinator within the PIU. The Grievance Coordinator will work to address and resolve the complaint and inform the worker as promptly as possible, in particular if the complaint is related to something urgent that may cause harm or exposure to the person, such as lack of PPE needed to prevent transmission of communicable diseases. For non-urgent complaints, the Grievance Coordinator will aim to resolve complaints withing 2 weeks. For complaints that were satisfactorily resolved by the Grievance Coordinator, the incident and resultant resolution will be logged by Grievance Coordinator and reported quarterly to the National Coordinating Committee (NCC) and the WB as part of regular reporting. Where the complaint has not been resolved, the Grievance Coordinator will refer to the Grievance Management Committee for further action or resolution. The workers will preserve all rights to refer matters to relevant judicial proceedings as provided under national labor law.

At the PIU level, each grievance record should be allocated a unique number for each received complaint. Complaint records (letter, email, record of conversation) should be stored together, electronically or in hard copy. The PIUs will appoint a Grievance Coordinator, who will be responsible for undertaking a review of all grievances to analyze and respond to any common issues arising. The Grievance Coordinator will also be responsible for oversight, monitoring, and reporting on the Worker GM.

Serious Grievances: In case a worker experiences serious mistreatment such as harassment, intimidation, abuse, violence, discrimination or injustice at the workplace, the worker may raise the case, verbally or in writing directly to the contractor or the PIUs (either directly or via Community Liaison Officers and designated sub-project focal points at the sub-project site level). The contractor will immediately refer the case to the PIUs. The PIUs will immediately investigate the case respecting confidentiality and anonymity of the worker.

Upon project effectiveness, the PIUs will designate a Grievance Management Committee to address serious grievances. The Grievance Management Committee will review complicated grievances that cannot be resolved through the Grievance Coordinator. The PIUs and the World Bank will jointly develop culturally sensitive and locally appropriate roles and responsibilities, and procedures. In case of a serious grievance, the direct worker or civil servant may directly contact verbally or in writing the Grievance Management Committee. All complaints received will be filed and kept confidential. For statistical purposes, cases will be anonymized and bundled to avoid identification of persons involved.

Code of Conduct (CoC)

- Treat women, children (persons under the age of 18), and men with respect regardless of ethnicity, language, religion, political or other opinion, national, social origin, citizenship status, property, disability, birth, or other status.
- Do not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Do not participate in sexual activity with community members.
- Do not engage in sexual favors or other forms of humiliating, degrading, or exploitative behavior.
- Do not engage in any activity that will constitute payment for sex with members of the communities surrounding the workplace.
- Report through the Worker GM suspected or actual gender-based violence against a person of any gender by a fellow worker or any breaches of this Code of Conduct.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass women, children, or a vulnerable person through these mediums.
- Comply with all relevant local legislation.
- Engaging in any of the prohibited activities above can be cause for termination of employment, criminal liability, and/or other sanctions.

ANNEX 6: CODE OF CONDUCT TEMPLATE (PIU STAFF)

I, _____, staff at the PIU in [name of Ministry/Agency where the PIU sits) for the Resilient Renewable Energy Infrastructure Investment Facility (RREIIF) Project, acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing Gender Based Violence (GBV), including sexual exploitation and abuse (SEA), and sexual harassment (SH) at the workplace, is important in and outside the context of this project, as further set out in this Code of Conduct. As such, we acknowledge this Code of Conduct identifies the behaviour that is expected of all PIU staff for the Caribbean Efficient and Green-Energy Buildings Project.

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

For the purpose of this Code of Conduct, it is important to note that GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (that is, gender) differences between male and female individuals. GBV includes acts that inflict physical, mental, or sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV includes the following concepts:

- **Sexual Exploitation and Abuse (SEA):** Sexual exploitation is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual harassment (SH):** occurs between personnel and staff on the project and means any unwelcome sexual advance, request for sexual favors, and other verbal or physical conduct of a sexual nature.

A violation to this Code of Conduct, including failure to follow ESHS and OHS standards, or engaging in activities constituting GBV including SEA/SH—be it on the workplace, work sites, work site surroundings, at workers' camps, or the surrounding communities—, constitute acts of serious misconduct, which contravenes the terms of employment, and are therefore grounds for disciplinary action up to and including termination of employment for PIU staff. Acts that may violate the laws of [country] will be additionally referred to the corresponding legal authorities, including for potential prosecution under the Criminal Code.

Commitments under this Code of Conduct

I agree that while working on the Project, I shall:

<u>General</u>:

1. carry out my 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 Project staff, workers, and any other person.

Regarding ESHS and OHS:

3. Attend and actively partake in training courses related to ESHS and OHS as requested by my employer.
4. Always wear my personal protective equipment (PPE) when at the work site or engaged in project related activities.
5. Implement the OHS Management Plan.
6. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties.
7. Report work situations that are not safe or healthy and remove myself from a work situation which I reasonably believe presents an imminent and serious danger to my life or health.

Regarding equality of opportunity and treatment:

8. Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic, or social origin, property, disability, birth, or other status.

Regarding discrimination and violence based on gender:

9. Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
10. Not engage in SEA with project beneficiaries and members of the surrounding communities.
11. Not engage in sexual harassment with other project personnel and staff —for instance, comments on the appearance of another worker (either positive or negative) and sexual desirability. making unwelcome sexual advances, looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; and offering or giving personal gifts.
12. Not engage in sexual favours —for instance, making promises of favourable treatment (e.g. promotion), threats of unfavourable treatment (e.g. loss of job) or payments in kind or in cash, dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviour.
13. Unless there is the full consent[4] by all parties involved, not have sexual interactions with members of the surrounding communities or work colleagues. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered “non-consensual” within the scope of this Code.

Regarding children under the age of 18

14. Not engage in any form of sexual contact or activity with children under the age of 18—including grooming or contact through digital media. Mistaken belief regarding the age of a child or his/her consent is not a defense or excuse.

[4] Consent is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance or agreement to do something. Consent must be informed, based on a clear appreciation and understanding of the facts, implications and future consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force or threats). No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. For the purpose of this Code of Conduct, consent cannot be given by children under the age of 18, even if national legislation introduces a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

15. Bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.
16. Wherever possible, ensure that another adult is present when working in the proximity of children.
17. Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
18. Not use any computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography.
19. Refrain from hiring children below the minimum age of 18.
20. Comply with all relevant local legislation, including labour laws in relation to child labour.
21. When photographing or filming a child for work related purposes, I must:
    a) Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
    b) Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
    c) Ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive way. Children should be adequately clothed and not in poses that could be sexually suggestive.
    d) Ensure images are honest representations of the context and the facts.
    e) Ensure file labels do not reveal identifying information about a child when sending images electronically.

Disciplinary Measures

The Ministry of [specify ministry where the PIU sits] shall be responsible for making decisions on the specific sanctions to be imposed on workers for violations to this Code of Conduct. I understand that if I breach this Code of Conduct, the Ministry of [specify ministry where the PIU sits] will take disciplinary action according to the seriousness of the offense which could include:

- verbal notification (For Public Officers) warning for PIU staff employed by the Ministry of [specify ministry where the PIU sits]
- written notification (For Public Officers) warning for PIU staff employed by the Ministry of [specify ministry where the PIU sits]
- termination of employment

<u>Infringements sanctioned with verbal notification:</u>
Those behaviours that do not cause relevant risks to the Ministry of [specify ministry where the PIU sits], other workers and/or its relationship with the communities. Verbal warnings may involve a reminder of the Code of Conduct and its applicability.

<u>Infringements sanctioned with written notification:</u>
Those behaviours that cause minor risk to the Ministry of [specify ministry where the PIU sits], other workers and/or its relationship with the communities and/or the environment.

<u>Infringements sanctioned with termination of employment:</u>
Those behaviours that cause substantive risks to the Ministry of [specify ministry where the PIU sits], other workers and/or its relationship with the communities and/or the environment, or behaviours that

constitute serious misconduct in accordance with this Code of Conduct. In such cases, the termination of employment may be accompanied by a referral to the corresponding legal authorities. Cases of SEA or SH will always be considered serious misconduct. Recurrent offences to the Code of Conduct will also be considered serious misconduct.

Termination of employment shall be carried out in accordance with the Labour Code of [country].

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met; that I will adhere to the occupational health and safety management plan; and, that I will avoid actions or behaviors that could be construed as GBV, including SEA and SH. Any such actions will be a breach of this Code of Conduct. I do hereby acknowledge that I have read the foregoing Code of Conduct, agree to comply with the standards contained herein, and understand my roles and responsibilities to prevent and respond to ESHS, OHS, and GBV issues. I understand that any action inconsistent with this Code of Conduct or failure to act, may result in disciplinary action.

Staff Signature: _____

Printed Name : _____

Title: _____

Date: _____

ANNEX 7: CODE OF CONDUCT TEMPLATE (CONTRACTOR'S PERSONNEL)

This document is also included as part of the Request for Bids Small Works Standard Procurement Document.

***Note to the Employer**:*

***The following minimum requirements shall not be modified**. The Employer may add additional requirements to address identified issues, informed by relevant environmental and social assessment.*

The types of issues identified could include risks associated with: labor influx, spread of communicable diseases, and Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) etc.

Delete this Box prior to issuance of the bidding documents.

***Note to the Bidder**:*

***The minimum content of the Code of Conduct form as set out by the Employer shall not be substantially modified**. However, the Bidder may add requirements as appropriate, including to take into account Contract-specific issues/risks.*

The Bidder shall initial and submit the Code of Conduct form as part of its bid.

CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

We are the Contractor, [*name of Contractor*]. We have signed a contract with [*name of Employer*] for [*description of the Works*]. These Works will be carried out at [*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, laborers and other employees at the Works Site 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 their 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;

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 serious danger to their 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 Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
7. not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
8. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or 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 on health and safety matters, and Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
11. report violations of this Code of Conduct; and
12. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Redress Mechanism.

RAISING CONCERNS

If any person observes behavior 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 [*name of the Contractor's Social Expert with relevant experience in handling gender-based violence, 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 at [ ] 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 person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior 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 [name of Contractor's contact person with relevant experience] requesting an explanation.

Name of Contractor's Personnel: _____

Signature: _____

Date: _____

Countersignature of authorized representative of the Contractor:

Signature: _____

Date: _____

ATTACHMENT: BEHAVIORS CONSTITUTING SEXUAL EXPLOITATION AND ABUSE (SEA) AND BEHAVIORS CONSTITUTING SEXUAL HARASSMENT (SH)

The following non-exhaustive list is intended to illustrate types of prohibited behaviors:

(1) **Examples of sexual exploitation and abuse** include, but are not limited to:

- A Contractor's Personnel tells a member of the community that he/she can get them jobs related to the work site (e.g. cooking and cleaning) in exchange for sex.
- A Contractor's Personnel that is connecting electricity input to households says that he can connect women headed households to the grid in exchange for sex.
- A Contractor's Personnel rapes, or otherwise sexually assaults a member of the community.
- A Contractor's Personnel denies a person access to the Site unless he/she performs a sexual favor.
- A Contractor's Personnel tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her.

(2) **Examples of sexual harassment in a work context**

- Contractor's Personnel comment on the appearance of another Contractor's Personnel (either positive or negative) and sexual desirability.

- When a Contractor's Personnel complains about comments made by another Contractor's Personnel on their appearance, the other Contractor's Personnel comment that he/she is "asking for it" because of how he/she dresses.
- Unwelcome touching of a Contractor's or Employer's Personnel by another Contractor's Personnel.
- A Contractor's Personnel tells another Contractor's Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.

ANNEX 8: INCIDENT FORM

Part A: (To be completed by WB Task Team)

Part B: To be completed by Borrower within 48 hours

B1: Incident Details			
Date of Incident:	**Time:**	**Date Reported to PIU:**	**Date Reported to WB:**
Reported to PIU by:	**Reported to WB by**:	**Notification Type**: Email/'phone call/media notice/other	
Full Name of Main Contractor:		**Full Name of Subcontractor**:	

B2: **Type of incident (please check all that apply)***
Fatality ☐ Lost Time Injury ☐ Displacement Without Due Process ☐ Child Labor ☐ Acts of Violence/Protest ☐ Disease Outbreaks ☐ Forced Labor ☐ Unexpected impacts on heritage resources ☐ Unexpected impacts on biodiversity resources ☐ Environmental pollution incident ☐ Dam failure ☐ Other ☐

*See Appendix 1 for definitions

B3: Description/Narrative of Incident
For example: *I. What is the incident?* *II. What were the conditions or circumstances under which the incident occurred (if known)?* *III. Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions?* *IV. Is the incident still ongoing or is it contained?* *V. Have any relevant authorities been informed?*

B4: Actions taken to contain the incident			
Short Description of Action	**Responsible Party**	**Expected Date**	**Status**
For incidents involving a contractor: Have the works been suspended under Contract GCC8.9? Yes ☐; No ☐; Name of Contractor:			

B5: What support has been provided to affected people

Part C: To be completed by Borrower (following investigation)

C1: Investigation Findings
For example: *I. where and when the incident took place* *II. who was involved, and how many people/households were affected* *III. what happened and what conditions and actions influenced the incident* *IV. what were the expected working procedures and were they followed* *V. did the organization or arrangement of the work influence the incident* *VI. were there adequate training/competent persons for the job, and was necessary and suitable equipment available* *VII. what were the underlying causes; where there any absent risk control measures or any system failures*

C2: Corrective Actions from the investigation to be implemented (To be fully described in Corrective Action Plan)

Action	Responsible Party	Expected Date

C3a: Fatality/Lost time Injury information

Cause of fatality/injury for worker or member of the public (please check all that apply):

1. Caught in or between objects ☐ 2. Struck by falling objects ☐ 3. Stepping on, striking against, or struck by objects ☐
4. Drowning ☐ 5. Chemical, biochemical, material exposure ☐
6. Falls, trips, slips ☐
7. Fire & explosion ☐
8. Electrocution ☐ 9. Homicide ☐ 10. Medical Issue ☐ 11. Suicide ☐ 12. Others ☐
***Vehicle Traffic:* 13. Project Vehicle Work Travel ☐ 14. Non-project Vehicle Work Travel ☐ 15. Project Vehicle Commuting ☐**
16. Non-project Vehicle Commuting ☐ 17.Vehicle Traffic Accident (Members of Public Only) ☐

Name	Age/DOB	Date of Death/Injury	Gender	Nationality	Cause of Fatality/Injury	Worker (Employer)/Public

C3b: Financial Support/Compensation Types (To be fully described in Corrective Action Plan template)

1. Contractor Direct ☐ 2. Contractor Insurance ☐ 3. Workman's Compensation/National Insurance ☐
4. Court Determined Judicial Process ☐ 5. Other ☐ 6. No Compensation Required ☐

Name	Compensation Type	Amount (US$)	Responsible Party

C4: Supplementary Narrative

Appendix 1: Incident Types

The following are incident types to be reported using the environmental and social incident response process:

Fatality: Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins).

Lost Time Injury: Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring 3 or more days off work, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.

Acts of Violence/Protest: Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.

Disease Outbreaks: The occurrence of a disease in excess of normal expectancy of number of cases. Disease may be communicable or may be the result of unknown etiology.

Displacement Without Due Process: The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.

Child Labor: An incident of child labor occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (i) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

Forced Labor: An incident of forced labor occurs when any work or service not voluntarily performed is exacted from an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This also includes incidents when trafficked persons are employed in connection with a project.

Unexpected impacts on heritage resources: An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or nationally protected areas that was not foreseen or predicted as part of the project design or the environmental or social assessment.

Unexpected impacts on biodiversity resources: An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or

predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species.

Environmental pollution incident: Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24hrs or have resulted in harm to the environment.

Dam failure: A sudden, rapid, and uncontrolled release of impounded water or material through overtopping or breakthrough of dam structures.

Other: Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm had occurred on that occasion. Any repeated non-compliance or recurrent minor incidents which suggest systematic failures that the task team deems needing the attention of WB management.

Appendix 2: Definition of fatality/injury cases

1. **Caught in or between objects:** caught in an object; caught between a stationary object and moving object; caught between moving objects (except flying or falling objects).
2. **Struck by falling objects:** slides and cave-ins (earth, rocks, stones, snow, etc.); collapse (buildings, walls, scaffolds, ladders, etc.); struck by falling objects during handling; struck by falling objects.
3. **Stepping on, striking against, or struck by objects:** stepping on objects; striking against stationary objects (except impacts due to a previous fall); Striking against moving objects; Struck by moving objects (including flying fragments and particles) excluding falling objects.
4. **Drowning:** respiratory impartment from submersion/emersion in liquid.
5. **Chemical, biochemical, material exposure:** exposure to or contact with harmful substances or radiations.
6. **Falls, trips, slips:** falls of persons from heights (e.g., trees, buildings, scaffolds, ladders, etc.) and into depths (e.g., wells, ditches, excavations, holes, etc.) or falls of persons on the same level.
7. **Fire & explosion:** exposure to or contact with fires or explosions.
8. **Electrocution:** exposure to or contact with electric current.
9. **Homicide:** a killing of one human being by another.
10. **Medical Issue:** a bodily disorder or chronic disease.
11. **Suicide:** the act or an instance of taking, or attempting to take, one's own life voluntarily and intentionally.
12. **Others:** any other cause that resulted in a fatality or injury to workers or members of the public.

Vehicle Traffic

13. **Project Vehicle Work Travel:** traffic accidents in which project workers, using project vehicles, are involved during working hours and which occur in the course of paid work.
14. **Non-project Vehicle Work Travel:** traffic accidents in which project workers, using non-project vehicles, are involved during working hours and which occur in the course of paid work.
15. **Project Vehicle Commuting:** traffic accidents in which project workers, using project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.
16. **Non-project Vehicle Commuting:** traffic accidents in which project workers, using non-project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.
17. **Vehicle Traffic Accident (Members of Public Only):** traffic accidents in which non-project workers/members of the public are involved in an accident while travelling for any purpose.

ANNEX 9: OUTLINES OF OTHER RELEVANT MANAGEMENT PLANS

Community Health and Safety Plan (CHSP): A CHSP addresses the risks and impacts of the project on the health and safety of affected communities during the project life cycle, including those who, because of their circumstances, may be vulnerable. Mitigation measures identified in the plan should comply with national legal requirements, Environmental, Health and Safety Guidelines (EHSGs) and Good International Industry Practice (GIIP). The CHSP requirements will be included as part of the ESMP. The basic content of a CHSP should include:

- Objectives based on the findings of an environmental and social assessment or similar document(s).
- Activities to be carried out, along with any specific project requirements needed to achieve the intended objectives. This should cover at a minimum:
    - Safety of Services, including the provision of services to communities
    - Traffic and Road Safety, involving potential traffic and road safety risks to workers, affected communities, and road users throughout the project life cycle; vehicles or fleets of vehicles owned or leased for project purposes; and the use of project equipment that could have an impact on public roads or other public infrastructure
    - Community Exposure to Health Issues, including community exposure to waterborne, water based, water-related, and vector-borne diseases, and communicable and non-communicable diseases that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups
    - Security Personnel**,** addressing risks posed by direct or contracted workers providing security to safeguard its personnel and property to those within and outside the project site.
- Project requirements that the implementing entities follow to achieve objectives.
- An implementation schedule for the key activities, considering the planned timing of construction and other project activities.
- Institutional responsibilities for plan implementation.
- Cost estimate for plan implementation, including up-front investment costs and long-term recurrent costs. The plan also specifies funding sources for these costs.

The CHP can also cover traffic and road safety, management of hazardous waste and emergency preparedness and response.

Waste management plan (WMP): The generation of waste must be considered from the very beginning - during the planning contracting, construction and implementing phases of a subproject. Measures should be taken to minimize, manage, and dispose all types of waste that could be generated by all the project activities. A WMP where needed must be developed for subproject activities. It will include the management of solid, liquid, and gas 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.). The WMP must comply with the existing country legislation and regulations. The basic content should include:

- Objective of the WMP
- Description of waste generating activities and types of waste likely to be generated

- Measures for managing the waste generated
- Permitting requirements for the disposal of the different types of wastes
- Any special considerations such as avoiding burning of waste, community outreach or precautions in case of hazardous waste
- Monitoring requirements
- Adaptive management arrangements

The WMP will be included as part of the ESMP in the case of Moderate risk subprojects and either be a part of the ESMP or a standalone document for Substantial risk projects. The ESIA would identify if a separate WMP is required. Based on the WMP, the contractor would develop a site-specific waste management plan to be approved prior to construction by the PIU/supervising engineer.

Traffic Management Plan: The traffic management plan is meant to provide specific measures to be implemented to ensure proper traffic management while minimizing accident risks and other impacts to communities. The plan should consider amount of vehicular traffic, pedestrian use, access to sites, the uses of signs, and control mechanisms to allow the free, safe, and orderly movement. The basic contents of a traffic management plan should include:

- Objective of the Traffic management plan
- Potential sites or traffic routes
- Traffic management measures to be implemented during construction with particular focus on sensitive receptors
- Any special considerations such as construction vehicles avoiding certain areas or times of the day, community outreach to make people aware of possible changes to current traffic patterns
- Implementation plan
- Monitoring requirements
- Adaptive management

The Traffic management plan requirements will be included as part of the ESMP. Based on this, the contractor would develop a site-specific traffic management plan to be approved prior to construction by the PIU/supervising engineer.

Pest Management Plan: Integrated Pest Management (IPM) and Integrated Vector Management (IVM) are encouraged when a sub-project engages pest management measures. When there are significant pest management issues identified, a Pest Management Plan (PMP) will need to be prepared. A PMP is also prepared when pest control products represent a large component of the sub-project. The PMP is a comprehensive framework through which pest management is defined and accomplished. The PMP should identify elements of the program to include health and environmental safety, pest identification, and pest management, as well as pesticide storage, transportation, use and disposal. The PMP is to be used as a tool to reduce reliance on pesticides, to enhance environmental protection, and to maximize the use of integrated pest management techniques. The PMP should apply to all the activities and individuals working on the sub-project or activity. The PMP should be consistent with IPM and emphasize that non-chemical control efforts will be used to the maximum extent possible before pesticides are used.

ANNEX 10: CHANCE FIND PROCEDURES

Cultural heritage encompasses tangible and intangible heritage which may be recognized and valued at a local, regional, national, or global level. *Tangible cultural heritage*, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be in urban or rural settings and may be above or below land or under the water. *Intangible cultural heritage*, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artefacts, and cultural spaces associated therewith — that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history. Prior to starting work under the project, the relevant local authority should be notified and contact information of the cultural heritage officer that can respond in case of chance finds should be available with the PIUs.

In the event that during construction, sites, resources, or artifacts of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents. These procedures consider requirements related to Chance Finding under relevant national legislation.

- Immediately stop the construction activities in the area of the chance find.
- Delineate the discovered site or area.
- Secure the site to prevent any damage or loss of removable objects.
- Notify the PIU who in turn will notify the responsible local authorities.
- Responsible local authorities and the relevant Ministry would be in charge of protecting and preserving the site before deciding on subsequent appropriate procedures.
- Decisions on how to handle the finding shall be taken by the responsible authorities and the relevant Ministry. This could include changes in the layout (such as when finding irremovable remains of cultural or archeological importance), conservation, restoration, and salvage.
- Implementation of the authority decision concerning the management of the finding shall be communicated in writing by the relevant Ministry of Culture.
- Construction work could resume only after permission in writing is given from the responsible local authorities and the relevant Ministry concerning safeguard of the heritage.
- The World Bank needs to be notified by PIU on the issues and actions taken.
- These procedures must be referred to as standard provisions in construction contracts. During project supervision, the PIU shall monitor the above regulations relating to the treatment of any chance find encountered.
- Relevant findings will be recorded in Progress Reports and the overall effectiveness of the project's cultural property mitigation, management, and activities will be assessed.

ANNEX 11: QUARTERLY PROJECT PROGRESS REPORTING TEMPLATE

Note: This is a template and would need to be modified based on the Negotiated ESCP of each country.

Caribbean Resilient Renewable Energy Infrastructure Investment Facility (P180831)
Monitoring report on Environmental and Social Standards
Country: [Official name of the country reporting]
Period: [Period of reporting]

SECTION I – PROJECT PROGRESS

SUMMARY OF OVERALL PROJECT PROGRESS -In relation to the implementation of the Environmental and Social Standards relevant to the project and in accordance with the project Environmental and Social Commitment Plan (ESCP)

SECTION II - ESCP

MATERIAL MEASURES AND ACTIONS		**DETAILS**
MONITORING AND REPORTING		
A	**REGULAR REPORTING** The project has been submitting bi-annual monitoring reports on the environmental, social, health, and safety (ESHS) performance and the implementation of the ESCP? ☐Yes ☐No	If YES: provide dates of previous Reports If NO, please briefly explain.
B.	**INCIDENTS AND ACCIDENTS** Any incidents and/or accidents during the reporting period? ☐Yes ☐No	If YES, please provide details on: (i) the incident/accident, (ii) when and how was brought to the attention of the PIU; (iii) immediate measures taken or that are planned to be taken to address it, and (iv) any information provided by any contractor and supervising entity, as appropriate.
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		

MATERIAL MEASURES AND ACTIONS		DETAILS
1.1	**ORGANIZATIONAL STRUCTURE** Does the project have a qualified environmental specialist in place? ☐Yes ☐No Does the project have a qualified social specialist in place? ☐Yes ☐No Have there been any changes to the Project staff overall? If yes, please explain.	If YES: provide dates on which they were hired. If NO, please briefly explain
1.2.	**MANAGEMENT OF TOOLS AND INSTRUMENTS** a) Are E&S instruments integrated into the Project Operational Manual? ☐Yes ☐No b) Have ESAs and ESMPs been prepared for subprojects and other relevant Project activities, in accordance with the ESMF? ☐Yes ☐No	a) If YES: provide date of completion. If NO, please briefly explain. b) If YES: please provide detail on how many were prepared, dates and status of implementation. If NO, please briefly explain.
1.3.	**MANAGEMENT OF CONTRACTORS** a) Are relevant aspects of the ESCP and the ESSs into the procurement documents? ☐Yes ☐No b) Do consulting firms, contractors, and supervision firms comply with the environmental, social, and health & safety specifications as well as the codes of conduct of their respective contract?	a) Briefly explain in which contracts and what aspects are included. b) Briefly explain status of compliance.
ESS 2: LABOUR AND WORKING CONDITIONS		
2.1	**LABOUR MANAGEMENT PROCEDURES** a) Do project workers have knowledge of the LMP including the worker GRM and the code of conduct of the project? ☐Yes ☐No b) In the second column, mention how many workers by category: direct, contracted, community workers, primary supply workers (if any) c) In the second column, mention how many female workers in proportion to male workers.	a) Briefly explain b) Direct workers: Contracted workers: Community workers: Primary supply workers: c) Female workers: Male workers:

MATERIAL MEASURES AND ACTIONS		DETAILS
2.2	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** Were any grievances captured in the grievance log for the reporting period? ☐Yes ☐No	If YES, please give the number of grievances and briefly explain the content. Include the updated grievance log for project workers as an Annex to this report.
2.3.	**OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES** a) Are specific OHS measures included in the respective ESMPs? ☐Yes ☐No b) Have OHS measures been incorporated into bidding documents and contracts with consulting firms, contractors, and supervision firms? ☐Yes ☐No c) Do consulting firms, contractors, and supervision firms implement OHS measures for each work site/activity? ☐Yes ☐No	For each question: If YES: provide details. If NO, please briefly explain.
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
	MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS Are waste management measures included in the ESMPs developed? ☐Yes ☐No Have waste management been incorporated into bidding documents and contracts? ☐Yes ☐No Do the contractors require permission to dispose waste at the disposal site? ☐Yes ☐No	If Yes, list for which sub-projects and provide details
ESS 4: COMMUNITY HEALTH AND SAFETY		
4.1	**COMMUNITY HEALTH AND SAFETY** Are community occupational health and safety measures adopted in subproject sites? ☐Yes ☐No	Briefly explain status of implementation of these measures at subproject sites.
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		

MATERIAL MEASURES AND ACTIONS		DETAILS
5.1.	**RESETTLEMENT PLANS** Have RAPs been developed in line with the RPF? ☐Yes ☐No	Please provide details on RAPs, including, inter alia: number of PAPs, status of implementation, consultations, challenges.
5.2.	**WILLING SELLER / WILLING BUYER TRANSACTIONS** Have any "willing buyer-willing seller" transactions taken place in the context of the Project? ☐Yes ☐No	If YES, please provide details of the transaction, especially evidence that it was voluntary and informed.
5.3.	**LAND DONATION** Has any land donation taken place in the context of the Project? ☐Yes ☐No	If YES, please provide details of the transaction, especially evidence as set forth in the ESCP.
5.4	**GRIEVANCE MECHANISM** Have any grievances related to impacts covered under ESS5 been received through the GRM? ☐Yes ☐No	If YES, please give the number of grievances and briefly explain the content. Include the updated grievance log for ESS5 as an Annex to this report.
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES		
6.1	Have any sub-project activities altered or caused destruction to critical or sensitive natural habitats? ☐Yes ☐No	If Yes, list for which sub-projects and provide details
ESS 8: CULTURAL HERITAGE		
8.1.	**CHANCE FINDS** Has a "chance find" taken place while implementing subprojects? ☐Yes ☐No	If YES, please briefly explain procedure used, dates and current status.
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1.	**STAKEHOLDER ENGAGEMENT PLAN** Have any new consultations taken place during this reporting period? ☐Yes ☐No Have other types of stakeholder/citizen engagement taken place in the reporting period? ☐Yes ☐No	If YES, to a) and or b), please provide dates, purpose, places, and topics. Also, explain how feedback from stakeholders influenced the decision-making of the project. Include an stakeholder engagement report as an Annex to this report for more details on implementation of the SEP.
10.2.	**PROJECT GRIEVANCE MECHANISM** Were any grievances captured in the grievance log for the reporting period? ☐Yes ☐No	If YES, please give the number of grievances and briefly explain the content. Include the updated grievance log as an Annex to this report.
CAPACITY SUPPORT		

MATERIAL MEASURES AND ACTIONS		DETAILS
	TRAINING Any new training activities to project workers and contracted workers during this reporting period? ☐Yes ☐No	If YES, please provide dates, places, number of participants and topics. Also, explain how these trainings are building capacity to manage environmental and social risks. You may include a brief report on training activities as an annex to this report.

SECTION lll – CONTEXT

Mention aspects of the socio-economic, cultural, or political context of your concern that can or has impacted - either positively or negatively- the project's Environmental and Social Standards' performance (detected for the present reporting period)

SECTION lV – CHALLENGES AND LESSONS LEARNED

Mention any challenges faced during Project implementation in the reporting period, measures taken to overcome those challenges and lessons learned.

SECTION V: OTHER RELEVANT INFORMATION

Any additional relevant information to mention in this report, including compliance with agreed actions in the latest Aide Memoire.

Staff Signature: _____

Printed Name: _____

Title: _____

Date: _____

ANNEX 12: E&S MONITORING AT SUB-PROJECT LEVEL FORM

This form provides a record of monitoring the implementation of E&S risk management mitigation plans as part of project monitoring visits and through supervision missions, while works are taking place at the sub-project site. This form should be filled out by the E&S Specialists and CLO.

ENVIRONMENTAL AND SOCIAL MONITORING REPORT
[DATE]

A. Project Information:

Subproject Title/Location:	
Estimated Cost	
Start/Completion Date	
Monitoring Report Prepared By:	

B. Status of Implementation: (Progress on the completion of project works)

ACTIVITY	STATUS

C. Environmental and Social Compliance: *Identify the environmental and social mitigation measures recommended at sub-project level for the site. Describe the actions taken to ensure E&S compliance (such as around OHS performance, or other environmental or social issues generally). Please add any additional measures taken to show environmental and social compliance and any challenges faced.*

D. Stakeholder Consultations: Describe the consultation activities during the reporting period.

E. Status of the Grievance Mechanism:

Nature of Grievance	Date received	Status	Resolution	Date closed	Comments

F. Lessons Learned:

Signature of Project Coordinator: _____
Printed Name: _____
Date: _____