

Saint Lucia

Ministry of Infrastructure, Ports, Transport, Physical Development and Urban Renewal CARIBBEAN RESILIENT RENEWABLE ENERGY INFRASTRUCTURE INVESTMENT FACILITY P180831

ENVIRONMENTAL AND SOCIAL

COMMITMENT PLAN (ESCP)

Appraisal Version 18 December, 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- Saint Lucia (the Recipient) will implement the Caribbean Resilient Renewable Energy Infrastructure Investment Facility Project, with the involvement of the Ministry of Infrastructure, Ports, Transport, Physical Development and Urban Renewal, as set out in the Financing Agreement and the Grant Agreement. The International Development Association (the Association), acting on its own capacity and acting as an implementing entity of the Clean Technology Fund, has agreed to provide the financing for the Project, as set out in the Agreements.
- 2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
- 3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
- 4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreement. The Recipient shall promptly disclose the updated ESCP.
- 5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
|--|--|--|---|
| IMPLEMENTATION ARRANGEMENTS | AND CAPACITY SUPPORT | | |
| Ministry of Infrastructure (MIPTPDUR) with addition environmental, social, he including through the hiri and a community liaison of will be detailed in the res Operations Manual. b. Include E&S aspects in an | RE e existing Project Implementation Unit under the Saint Lucia s, Port, Transport, Physical Development and Urban Renewal nal qualified staff and resources to support management of alth and safety (E&S) risks and impacts of the Project as needed, ing of an additional environmental specialist, a social specialist officer. The responsibilities and qualifications of the specialists pective Terms of Reference, which will be included in the Project and sign the service level agreement with the Regional Renewable (RCU) to manage E&S risks and impacts of the Project. | a. Hire or appoint an environmental specialist, a social specialist and one community liaison officer for this Project, within 90 days after the effective date of the Agreements (the Effective Date). Thereafter maintain the PIU and these positions throughout Project implementation. b. Within 90 days after the Effective Date | Saint Lucia Ministry of Infrastructure, Port, Transport, Physical Development and Urban Renewal (MIPTPDUR) MIPTPDUR/PIU |
| following: a. Prepare and implement to communities and relevan implications for their role but not limited to aspects management, emergency b. Participate in training on safety considerations in do contract management for c. Prepare, implement or participate in the parti | acity building plan, that includes activities, among others, the raining for PIU staff, consultants, contractors, stakeholders, t government agencies on the E&S project requirements and the as and responsibilities in implementing the project, including on a such as stakeholder mapping and engagement, grievance y preparedness and response, and community health and safety. ESHS matters, including (i) environment, social and health and lesign, (ii) integrating ESHS into procurement process and (iii) | a. Training program to commence no later than 180 days after the Effective Date. b. Prior to finalization of first (i) design (ii) bidding documents for works and (iii) start of works contract. c. Throughout Project implementation. | MIPTPDUR/PIU |
| B2 Training to be provided to Pro Environmental and socia Waste management Occupation Health and s response Community health and s SEA/SH risk managemen | oject contractors/workers on: Il requirements, including ESHS requirements rafety for the workforce including emergency preparedness and rafety | Prior to the start of civil works. | MIPTPDUR/PIU |

| MATE | RIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY |
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| C | RIAL MEASURES AND ACTIONS REGULAR REPORTING Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety performance of the Project. The reports shall include: Status of preparation and implementation of E&S documents required under the ESCP. 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 under action E below. Other aspects that may arise as relevant. | Submit quarterly reports to the Association throughout Project implementation, commencing after the Project Effective Date. Submit each report to the Association no later than 30 days after the end of each reporting period. | MIPTPDUR/PIU |
| D | CONTRACTORS' MONTHLY REPORTS In contracts for works using the Association's standard procurement documents (SPDs), require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association. | Submit the monthly reports to the Association upon request but include summaries of these as annexes to the quarterly reports submitted under Section C above, throughout implementation of the Project. | MIPTPDUR/PIU |
| E | INCIDENTS AND ACCIDENTS Notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association and implement a Corrective | Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association. | MIPTPDUR/PIU |

| MATE | RIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY |
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| | Action Plan that sets out the measures and actions to be taken to address the incident or | | |
| | accident and prevent its recurrence. | | |
| ESS 1 | ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS | 1 | |
| 1.1 | ENVIRONMENTAL AND SOCIAL INSTRUMENTS 1.Update and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. 2. Prepare as informed by the ESMF and when agreed with the Association, Environmental and Social Impact Assessment (ESIA), and/or Environmental and Social Management Plans (ESMP) for individual activities to comply with ESF requirements. Provide the ESIA, and/or ESMP to the Association for review and approval, prior to any activities being implemented. 3. For Part 2 of the Project, in collaboration with the RCU: ensure E&S instruments to be prepared for each subproject are included in the bidding documents require selected IPPs to prepare and implement site-specific E&S documents such as Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan and Consultation Plan, based on the screening undertaken advise, review and clear the site-specific E&S documents and submit to the Association. 4. For Part 2 of the Project, oversee in collaboration with the RCU, and require PFIs that finance subprojects to oversee preparation and implementation of site-specific ESIAs/ESMPs. The proposed activities described in the exclusion list shall be ineligible to receive financing | Update the ESMF no later than 90 days after the Effective Date, or before any project activity starts (whichever occurs first), and thereafter implement the ESMF throughout Project implementation. Prepare site-specific ESIAs and/or ESMPs prior to the start of the bidding process. Thereafter implement the ESMP throughout Project implementation. E&S documents prepared, cleared and implemented as needed prior to start of civil works. Throughout Project implementation. | MIPTPDUR/PIU |
| 1.2 | under the Project. MANAGEMENT OF CONTRACTORS 1. Ensure E&S specifications of the procurement documents and subsequent works contracts are appropriate to deliver the works in compliance with the ESCP, including inter alia: 1.1 Environmental and Social Assessments and/or Plans, 2.1 Labor Management Procedures (including code of conduct), 2.2 Occupational Health and Safety Management, 3.1 Waste Management Planning, 4.1 Traffic and Road Safety, and 8.1 Chance Finds 10.1 Stakeholder engagement plan requirements | As part of the preparation of procurement documents and prior to the issuance of works request for proposals or request for bids. Supervise engineer/consultant and contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon | MIPTPDUR/PIU |

| MATERIAL MEASURES AND ACTIONS | | TIMEFRAME | RESPONSIBLE ENTITY |
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| | 2. Ensure that the terms of reference for the supervising engineer/consultant and/or IPPs (under Part 2) contain adequate tasks, include codes of conduct, and require appropriately skilled specialists to enforce compliance with contract requirements. | 3.Throughout Project implementation. | |
| | 3. Oversee the work of the supervising engineer/consultant and/or IPPs (under Part 2) to ensure they enforce the works contract and that the contractors and/or IPPs and their subcontractors comply with the E&S requirements including code of conduct. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association. | | |
| 1.3 | TECHNICAL ASSISTANCE Ensure that the feasibility studies, capacity building, training, and any other technical assistance activities, in collaboration with the RCU, under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter, prepare and finalize the outputs of such activities in compliance with the terms of reference. | Throughout Project implementation. | MIPTPDUR/PIU |
| 1.4 | CONTINGENT EMERGENCY RESPONSE FINANCING 1. Ensure that the Contingent Emergency Response Operational Manual includes a CERC-ESMF which outlines a description of E&S risk assessment and management arrangements, in accordance with the ESSs. 2. Implement the E&S provisions of the Contingent Emergency Response Operational Manual, including the CERC-ESMF, and any assessments and plans required therein. | CERC-ESMF shall be prepared and disclosed prior to CERC activation and be implemented throughout the activation of the CERC component. The preparation of the Contingent Emergency Response Operational Manual and CERC- ESMF in form and substance acceptable to the Association is a withdrawal condition under Section [XX] of Schedule 2 of the [name of legal agreement]. In accordance with the timeframes specified in the Contingent Emergency Response Operational Manual, include the CERC-ESMF, and any assessments and plans required therein. | MIPTPDUR/PIU |

| MATE | RIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY |
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| ESS 2: | LABOR AND WORKING CONDITIONS | | |
| 2.1 | LABOR MANAGEMENT PROCEDURES Adopt and implement the Labor Management Procedures (LMP) as part of the ESMF for the Project. The LMP will describe the types of workers to be employed; the regulatory requirements that will govern the employment of workers, and any additional measures to ensure compliance with ESS2; the contractual arrangements (including details of their terms and conditions, pay, hours of work, holiday and other entitlements) that will apply; the approach for recruiting workers (reflecting requirements for non-discrimination, equal opportunity and avoidance of forced/trafficked and child labor) and managing labor influx; a mechanism dedicated for workers to submit workplace-related grievances; and procedures on how to address SEA/SH related grievances in line with World Association policies. The LMP will include the applicable Code of Conduct, as found in the World Banks's Standard Procurement Documents for Works. | Adopt and disclose the LMP no later than 90 days after the Effective Date, and thereafter implement the LMP throughout Project implementation. | MIPTPDUR/PIU |
| 2.2 | OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN 1. Develop and implement OHS measures as part of the development and implementation of the site specific ESMP in a manner acceptable to the World Association. 2. Incorporate the OHS measures into bidding documents and contracts with consulting firms, contractors and supervision firms. 3. Ensure that the OHS measures specified are implemented at the site. 4. Under Part 2, in collaboration with the RCU, require IPPs in collaboration with national PIUs and PFIs, to prepare and implement site-specific OHS Plans if needed, based on the screening undertaken. | 1, 2, 3. Same timeframe as for the implementation of the site- specific ESMPs (i.e. 1.1.2). 4. Prepare prior to start of civil works; thereafter implemented throughout Project implementation. | MIPTPDUR/PIU |
| 2.3 | GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. | Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation. | MIPTPDUR/PIU |

| MATE | RIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY |
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| 2.4 | CODE OF CONDUCT Ensure provisions in the bidding documents for contractors and supervision consultants to | Before awarding the contract. | MIPTPDUR/PIU |
| | establish a code of conduct to be signed by all workers, including any subcontractors, and establishing the minimum content of said code. The code of conduct must be based on the guidelines contained in the LMP and the ESMF and should address, among other issues, the risk of sexual exploitation and abuse and sexual harassment in the workplace. | Belore awarding the contract. | MIPTPDOK/PIO |
| ESS 3 | RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT | | |
| 3.1 | WASTE MANAGEMENT PLAN 1. Prepare and implement site-specific Waste Management Plans (WMP), if needed, as part of the ESMP prepared for the sub-project, to manage hazardous and non-hazardous wastes, consistent with ESS3. | Same timeframe as for the preparation and implementation of the site- specific ESMPs (i.e. 1.1.2). | MIPTPDUR/PIU |
| | Under Part 2, in collaboration with the RCU and PFIs, require IPPs to prepare and implement a site-specific Waste Management Plan, if needed, based on the screening undertaken. | Prepare prior to start of civil works; thereafter implemented throughout Project implementation. | |
| 3.2 | RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1. above. | 1. Same timeframe as for the preparation and implementation of the site-specific ESMPs (i.e. 1.1.2). | MIPTPDUR/PIU |
| | 2. Under Part 2, in collaboration with the RCU and PFIs, require IPPs to incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.1 above. | 2. Same timeframe as for the preparation and implementation of site-specific ESMPs (i.e. 1.1.3). | |
| ESS 4 | COMMUNITY HEALTH AND SAFETY | | |
| | Ensure E&S specifications are included in the bidding documents and subsequent works contracts for planning and agreeing on traffic management measures in line with Good | 1. As part of the preparation of procurement documents and prior to the issue of works request for proposals or | MIPTPDUR/PIU |
| | International Industry Practice to be implemented during construction works to protect workers, the community, and all road users. | request for bids.2. Same timeframe as for the preparation and | |
| | 2. Under Part 2, in collaboration with the RCU and PFIs, require IPPs to incorporate traffic and road safety measures in the ESMPs to be prepared under action 1.1 above. | implementation of site- specific ESMPs (i.e. 1.1.3). | |

| MAT | ERIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY |
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| 4.2 | COMMUNITY HEALTH AND SAFETY Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, generation of hazardous and non-hazardous waste, noise, dust, transportation of construction materials and increased traffic, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF. | Same timeframe as for the preparation and implementation of the site- specific ESMPs (i.e. 1.1.2). | MIPTPDUR/PIU |
| | 2. Under Part 2, in collaboration with the RCU and PFIs, require IPPs to incorporate measures to assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, generation of hazardous and non-hazardous waste, noise, dust, transportation of construction materials and increased traffic, and include mitigation measures in the ESMPs. | 2. Same timeframe as for the preparation and implementation of the site-specific ESMPs (i.e. 1.1.3). | |
| ESS ! | 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT | | |
| 5.1 | RESETTLEMENT FRAMEWORK AND RESETTLEMENT ACTION PLANS | | |
| | 1. Prepare and implement a Resettlement Framework (RF) for the Project, consistent with ESS5. | Prepare the RF within 90 days of Effective Date; thereafter implement the RF throughout Project implementation. | MIPTPDUR/PIU |
| ESS | Prepare and implement a Resettlement Plan (RP) for each activity under the Project for which such a RP is required, as set out in the RF and consistent with ESS5. Under Part 2, in collaboration with the RCU, cause PFI through their loan agreement with the IPP, ensure that IPPs prepare and implement RPs, if needed, based on the screening undertaken. | Prepare and implement the respective RPs prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided. Resettlement Plan prepared, cleared and implemented if needed, prior start of civil works. | |
| | 5: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOU | RCES | |
| 6.1 | BIODIVERSITY RISKS AND IMPACTS 1. Undertake surveys and obtain records as needed to identify baseline conditions of important marine and terrestrial species that many be affected by project activities. Use | | MIPTPDUR/PIU |

| MATE | RIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY |
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| | the baseline to assess the potential impacts and to avoid significant biodiversity impacts and to identify other appropriate controls and mitigation measures. 2. Ensure E&S specifications are included in the bidding documents and subsequent works contracts to mitigate impacts to biodiversity as identified in the site-specific ESMPs and any other report. | Same timeframe as for the preparation and implementation of the site- specific ESMPs (i.e. 1.1.2). As part of the preparation of procurement documents and prior to the issue of works | |
| | 3. Under Part 2, in collaboration with the RCU and PFIs, require IPPs to undertake surveys and obtain records as needed to identify baseline conditions of important marine and terrestrial species that many be affected by project activities. Use the baseline to assess the potential impacts and to avoid significant biodiversity impacts and to identify other appropriate controls and mitigation measures which will be included in the site specific ESMPs to be prepared under 1.1.1. | request for proposals or requests for bids. 3. Same timeframe as for the preparation and implementation of the site- specific ESMPs (i.e. 1.1.3). | |
| ESS 7: | INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LO | CAL COMMUNITIES | |
| This St | andard is not Relevant | | |
| ESS 8: | CULTURAL HERITAGE | | |
| 8.1 | CHANCE FINDS Describe and implement the chance finds procedures to be included in bidding documents and implemented in line with national legislation and the requirements under ESS8 in the ESMF. This will include adding clauses to construction contracts 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. Under Part 2, in collaboration with the RCU and PFIs, require IPPs, to include in site specific ESMPs and implement if needed, the chance finds procedure as described in the ESMF of the Project. | Same timeframe as the ESMF (i.e. 1.1.1). As part of the preparation of procurement documents and prior to the issue of works request for proposals or request for bids. Same timeframe as for the preparation and implementation of the site- specific ESMPs (i.e. 1.1.3). | MIPTPDUR/PIU |
| | FINANCIAL INTERMEDIARIES | | |
| 9.1 | ENVIRONMENTAL & SOCIAL MANAGEMENT SYSTEM Provide support to the RCU, as needed, to cause each PFI receiving guarantees from the Risk Mitigation Fund to develop, maintain, and implement an Environmental and Social Management System (ESMS) - to identify, assess, manage, and monitor the environmental and social risks and impacts of private sector subprojects that receive support through guarantees from the Project. | PFIs to adopt the ESMS prior to signing the IPP loan agreement and implement the ESMS throughout Project implementation. | MIPTPDUR/PIU |

| MATE | RIAL MEASURES AND ACTIONS | TIMEFRAME | RESPONSIBLE ENTITY |
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| ESS 10 | : STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE | | |
| 10.1 | Update, finalize and implement the Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. | No later than 90 days after the Effective Date; and thereafter implement the SEP throughout Project implementation. Same timeframe as for the preparation and | MIPTPDUR/PIU |
| | 2. Under Part 2, require IPPs in collaboration with the RCU and PFIs, to prepare and implement site specific consultation plans consistent with the project Stakeholder Engagement Plan and ESS10. | implementation of the site- specific ESMPs (i.e. 1.1.3). | |
| 10.2 | PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism as described in the SEP and in a manner consistent with ESS10, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project- affected parties, at no cost and without retribution, including concerns and grievances filed anonymously. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor- centered manner. Under Part 2, require IPPs in collaboration with the RCU and PFIs, to prepare and implement a grievance mechanism in line with the Project SEP and ESS10. | mechanism throughout Project implementation. | MIPTPDUR/PIU |
| INDICA | ATORS FOR IMPLEMENTATION READINESS | | |
| A. Ma 1.1. Ap 5.1. Re 10.1. A | llowing actions are indicators for implementation readiness: aintenance of the PIU and engagement of environmental specialist, social specialist and communi- aproved ESMF, including LMP asettlement Framework and Resettlement Plans approved Stakeholder Engagement Plan astablished Project Grievance Mechanism. | ty liaison officer. | |