Saint Lucia

Saint Lucia Air and Sea Ports Authority

Caribbean Regional Air Transport Connectivity Project (P170860)

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

April 22, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Saint Lucia will and/or will cause the Saint Lucia Air and Sea Ports Authority (SLASPA) to implement the Caribbean Regional Air Transport Connectivity Project (the Project). For the civil aviation related activities, the Project Implementing Unit (PIU) under the SLASPA will closely collaborate with the Civil Aviation Division of the Ministry of Economic Development, Housing, Urban Renewal, Transport and Civil Aviation (Civil Aviation Division). Furthermore, SLASPA will also coordinate with Eastern Caribbean Civil Aviation Authority (ECCAA) on the air transport regulation**.** The International Development Association (the World Bank) has agreed to provide financing for the Project.

2. Saint Lucia will and/or will cause SLASPA implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.

3. Saint Lucia will also comply and/or cause SLASPA to comply with the provisions of any other E&S documents required under the ESSs and referred to in this ESCP, including an Environmental and Social Assessment (ESA), Environmental and Social Management Plans (ESMPs), Labor Management Procedures (LMP), Stakeholder Engagement Plan (SEP), and other E&S provisions and plans consistent with ESA and ESMPs, and the timelines specified in those E&S documents.

4. Saint Lucia is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the entities, ministries and/or agencies referenced in paragraph one above.

5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the World Bank by Saint Lucia as required by the ESCP and the conditions of the legal agreement, and the World Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.

6. As agreed by the World Bank and Saint Lucia, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, Saint Lucia, in coordination with the SLASPA, will agree to the changes with the World Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the World Bank, Saint Lucia (through its authorized representative under the legal agreement), and SLASPA, acting through its General Manager. Saint Lucia and the SLASPA will promptly disclose the updated ESCP.

7. Where there are Project changes, unforeseen circumstances, or where Project performance results in changes to the risks and impacts during Project implementation, Saint Lucia shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts and gender-based violence.

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	**REGULAR REPORTING** Prepare and submit to the World Bank, as part of the biannual progress reports on the Project Implementation, regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, the implementation of the ESCP, occurrence of incidents and accidents, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).	Biannual reporting throughout Project implementation. Reports to be sent within the first 7 days after the end of each reporting period. Mid-term and completion reports will also submitted, as requested by the World Bank, during Project implementation.	The Project Implementation Unit (PIU) within the Saint Lucia Air and Sea Ports Authority (SLASPA)
B	**INCIDENTS AND ACCIDENTS** Promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including, inter alia, any accidents that result in death, serious or multiple injuries. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. A Borrower's Guide to Response to Environmental, Social and Occupational Health and Safety Incidents for the World Bank Financed Projects that further details how to address any incidents or accidents will be included as an annex to the ESA and the ESMPs.	Within 48 hours after learning of any fatality or other incident or accident. The submission of the subsequent report will be provided within a timeframe acceptable to the World Bank, as requested.	PIU/SLASPA

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	**CONTRACTORS MONTHLY REPORTS** Contractors will be required to provide monthly monitoring reports to the SLASPA. The monitoring reporting will include a section on environmental, social, health and safety (ESHS) of the construction sites, implementation of the environmental and social management plans (ESMPs), stakeholder engagement plan (SEP) and grievance redress mechanism (GRM). Such monthly reports will be submitted to the World Bank by SLASPA upon request.	Report monthly/quarterly upon the World Bank's request throughout Project implementation.	PIU/SLASPA
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	**ORGANIZATIONAL STRUCTURE** SLASPA will establish and maintain a PIU with qualified staff and resources, including at least one (1) qualified environmental and social specialist with qualifications and experience acceptable to the World Bank, and thereafter maintained throughout Project implementation. Adequate resources will be allocated to support management of ESHS risks of the Project.	The environmental and social specialist will be contracted within thirty (30) days after the Effective Date. The organizational structure will function throughout Project implementation.	PIU/SLASPA

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	**ENVIRONMENTAL AND SOCIAL ASSESSMENT AND ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS** Prepare, disclose, adopt and thereafter implement an Environmental and Social Assessment for the Project, which will include the site-specific Environmental and Social Management Plans (ESMPs) for civil works to be supported under the Project, in a manner acceptable to the World Bank. The ESMPs shall include, inter alia: • Waste Management Plan (WMP) • Hazardous Materials Control Plan (HMCP) • Pollution Management Plan (PMP) • Emergency Response Plan (ERP) • Traffic and Road Safety Plan (TRSP) • Community Health and Safety Plan (CHSP) • Security Plan (SP), if required by the World Bank • Strom water, sediment and erosion control plan (SWSECP) • Biodiversity Conservation Plan (BCP), if required by the World Bank	A draft ESA including three separate draft ESMPs (for Hewanorra International Airport (UVF, IATA 3-letter code), Georges FL Charles airport (SLU, IATA 3-letter code) and Automatic Dependent Surveillance - Broadcast (ADS-B) towers) have already been prepared. The ESA and the ESMPs will be further updated while preparing detailed designs and need to be approved by the World Bank before launching the respective bidding processes for civil works. The mitigation measures contained in the ESA and ESMPs will be implemented throughout Project implementation.	PIU/SLASPA
1.3	**MANAGEMENT OF CONTRACTORS** Develop and implement procedures for managing contractors and subcontractors, including, inter alia, by: • Ensuring that the ESMPs mentioned in action 1.2 above and the Labor Management Procedures are included in the bidding documents; • Ensuring that relevant requirements on environmental and social management are included in contracts and subcontracts (reflecting ESSs and ESCP); • Requiring the preparation of a detailed Contractor Environmental and Social Management Plan (C-ESMP) that is costed, with required budget and staff to mitigate E&S risks; • Monitoring contractor commitments and compliance; • Ensuring a separate Grievance Redress Mechanism for workers; • Ensuring contractors provide details on contractor's oversight on environmental, social, health and safety (ESHS) performance; and • Ensuring contractors prepare monthly reports on ESHS performance.	Prior to the preparation of bidding documents. Maintain procedures and supervise contractors throughout Project implementation.	PIU/SLASPA

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	**CONTINGENT EMERGENCY RESPONSE** a) Ensure that the ESA and the CER Manual incorporate the E&S management arrangements and requirements in a manner consistent with the ESSs, including the preparation of any required environmental and social instruments for the activities to be carried under the Contingent Emergency Response Part of the Project (Part 5). b) Prepare, adopt and disclose all the E&S instruments that may be required for activities under Part 5 of the Project in accordance with the ESA, the CER Manual and the ESSs, and thereafter implement the measures and actions required under said instruments, within the timeframes specified in said instruments, all in manner acceptable to the World Bank.	a) The adoption of the CER Manual in form, substance and manner acceptable to the World Bank is a withdrawal condition under Section III.B.1 (b) of Schedule 2 of the legal agreement for the Project b) The E&S instruments will be submitted for the World Bank's review and approval, and thereafter adopted before the carrying out of any activity under Part 5 of the Project that requires the preparation of these instruments. Once adopted, these instruments will be implemented in accordance with their terms, in a manner acceptable to the World Bank.	PIU/SLASPA or other entity/ministry/agency designated by Saint Lucia for the Contingent Emergency Response Part of the Project (Part 5) in accordance with the CER Manual
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	**LABOR MANAGEMENT PROCEDURES** Develop and Implement the Labor Management Procedures (LMP) for the Project. The LMP has been included as an annex to the ESMPs.	LMP acceptable to the World Bank has been prepared and included in the ESA. It will be updated together with the ESMPs, as per action 1.2 above, if needed, and thereafter implemented throughout Project implementation.	PIU/SLASPA
2.2	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** Establish, maintain, and operate a grievance mechanism for Project workers, or require the operation of a grievance mechanism (in the case of contractors) as described in the LMP and consistent with ESS2.	Grievance mechanism operational prior to engaging Project workers and maintained throughout Project implementation.	PIU/SLASPA
2.3	**OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES** Prepare, adopt, and implement appropriate occupational, health and safety (OHS) measures, including any emergency preparedness and response measures specified in the ESMPs to be developed under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	PIU/SLASPA
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	**WASTE MANAGEMENT PLAN** Prepare, adopt, and implement a Waste Management Plan as part of the ESMPs to be developed under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	PIU/SLASPA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.2	**HAZARDOUS MATERIALS CONTROL PLAN** Prepare, adopt, and implement a Hazardous Materials Control Plan as part of the ESMPs to be developed under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	PIU/SLASPA
3.3	**RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** Prepare, adopt and implement resource efficiency and pollution prevention and management measures, including a storm water, sediment and erosion control plan, which will be covered under the ESMPs to be prepared under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	PIU/SLASPA
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	**TRAFFIC AND ROAD SAFETY** Prepare, adopt, and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	PIU/SLASPA
4.2	**COMMUNITY HEALTH AND SAFETY** Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, including in relation to behavior of Project workers and any risks of labor influx, and include these measures in the ESMPs to be developed under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	PIU/SLASPA
4.3	**EMERGENCY RESPONSE** Prepare, adopt, and implement emergency response in accordance to updated ESMPs under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	PIU/SLASPA
4.3	**SECURITY MANAGEMENT** Prepare and adopt the security plan, if required (based on updated ESA), as part of the ESMPs to be updated under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	PIU/SLASPA
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
Not relevant for the Project			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	**BIODIVERSITY RISKS AND IMPACT** Develop and implement Biodiversity Conservation Plan, if required (based on updated ESA) to avoid, minimize or mitigate potential impacts that may have some significant negative impact on the biodiversity and sustainable management of living natural resources. These measures and actions will be part of the ESMPs to be updated under action 1.2 above.	Same timeframe as for the updating and implementation of the ESMPs, under action 1.2.	PIU/SLASPA

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not relevant for the Project			
ESS 8: CULTURAL HERITAGE			
8.1	**CHANCE FINDS** Prepare, adopt, and implement the chance finds procedure described in the ESMPs developed for the Project under action 1.2 above.	Same timeframe as for the updating and implementation of the ESMPs, under action 1.2.	PIU/SLASPA
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant for the Project			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	**STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION** Adopt, disclose, update (as needed) and implement a Stakeholder Engagement Plan (SEP), in a manner acceptable to the World Bank, to establish measures to allow for a continuous engagement and adequate communication strategies with relevant stakeholders throughout Project implementation.	The SEP has already been prepared and disclosed. Maintained and implemented throughout Project implementation.	PIU/SLASPA
10.2	**PROJECT GRIEVANCE MECHANISM** Establish, maintain and operate a grievance mechanism for the Project, as described in the SEP.	The grievance mechanism has already been designed and established, and will be maintained and operated throughout Project implementation.	PIU/SLASPA
CAPACITY SUPPORT			
CS1	**TRAINING** Orientation on ESSs will be provided to the PIU no later than sixty (60) days after the Effective Date. Implement training of Project workers and supervisors (mainly at the level of civil works/construction) on: • Occupational health and safety, including emergency prevention and preparedness and response arrangements to emergency situations. • Awareness of risks and how to mitigate impact on local communities.	Training for Project workers will be conducted before the start of the works. Training will thereafter continue throughout Project implementation.	PIU/SLASPA