**Saint Lucia**

**UNLEASHING THE BLUE ECONOMY OF THE CARIBBEAN PROJECT (P171833)**

**and its Additional Financing (P181493)**

**Updated version**

**Environmental and Social**

**Commitment Plan (ESCP)**

**9 April 2024**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. **Saint Lucia** (hereinafter the Recipient) is implementing the “Unleashing the Blue Economy of the Caribbean” Project (the Project) with the involvement of the Ministry of Finance, Economic Development and the Youth Economy (MoF) as set out in the Financing Agreements (Credit Number 7088-LC) and the Additional Financing (AF) Financing Agreement (Credit Number-7553 LC). The International Development Association (hereinafter, the Association) has agreed to provide the original financing (P171833) and additional financing (P181493) as set out in the referred agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
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 Financing Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
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, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient, through MoF and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.

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| **MATERIAL MEASURES AND ACTIONS** | **TIMEFRAME** | **RESPONSIBLE ENTITY/AUTHORITY** |
| **MONITORING AND REPORTING** |
| A | **REGULAR REPORTING**Prepare and submit to the Association, as part of the Project Reports, regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance redress mechanism. | Six-monthly reporting throughout Project implementation, starting from the Effective Date. Each report shall be submitted no later than 45 days after the end of each reporting period. | PIU / MoF |
| B | **INCIDENTS AND ACCIDENTS**Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence. | Notify the Association no later than 48 hours after learning of any fatality or other incident or accident. Provide subsequent report within a timeframe acceptable to the Association, as requested. | PIU / MoF |
| C | **CONTRACTORS MONTHLY REPORTS**Require contractors to provide monthly monitoring reports to PIU. The monitoring reporting will include a section on environmental, social, health and safety (ESHS) of the construction sites. The supervisory firms shall also provide monthly monitoring reports to PIU.  | Monthly reports submitted to the Association upon request. | PIU / MoF |

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| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** |
| **MATERIAL MEASURES AND ACTIONS** | **TIMEFRAME** | **RESPONSIBLE ENTITY/AUTHORITY** |
| 1.1 | **ORGANIZATIONAL STRUCTURE**Establish and maintain, a Project Implementation Unit (PIU) within MoF, with qualified staff and resources to support, among others, the management of ESHS risks and impacts of the Project, including,at minimum, one (Environmental Specialist and One Social Specialist. | Maintain a PIU as set out in the Financing Agreement, with an environmental specialist and a social specialist throughout Project implementation. | PIU / MoF |
| 1.2 | **MANAGEMENT TOOLS AND INSTRUMENTS**Ensure that the Project is executed in accordance with the following requirements, a) Implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs, and in a manner acceptable to the Association. b) Prepare, consult, adopt, disclose, and implement specific environmental and social impact assessments (ESIAs) and environmental and social management plans (ESMPs) and other plans as applicable for subprojects and other relevant Project activities, in accordance with the ESMF and in a manner acceptable to the Association. | 1. Implement the existing ESMF throughout Project implementation.
2. The ESIAs/ESMPs shall be adopted upon WB’s No objection and before launching the respective bidding processes. Implement ESMPs throughout the entire duration of the subproject or respective Project activity.
 | PIU / MoF |
| 1.3 | **MANAGEMENT OF CONTRACTORS**1. Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant requirements of the ESMF, Labor Management Procedures (LMP), ESIAs/ESMPs, and codes of conduct, in the environmental, social, and health & safety specifications of the bidding and procurement documents and contracts with consulting firms, contractors, and supervision firms and in their respective contracts.
2. Ensure that all 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 contracts.
 | a) Prior to commencing the relevant bidding processes, and thereafter incorporate in the respective contracts.b) Throughout the implementation of each subproject or respective Project activity. | PIU / MoF |
| 1.4 | **TECHNICAL ASSISTANCE**Ensure that consultancies, studies, capacity-building activities, training and any other activity of technical assistance provided under the Project be carried out in accordance with Terms of Reference (TORs) which incorporate all ESSs relevant requirements, in a manner acceptable to the Association.  | Submit TORs for review and no objection of the Association before launching the respective bidding process. This shall be carried out throughout the implementation of the Project. | PIU / MoF |
| 1.5 | **PERMITS, CONSENTS AND AUTHORIZATIONS** Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant authorities. Comply or cause to comply, as appropriate, with the conditions established in these permits, consents, and authorizations. | As applicable, to be obtained prior to initiating activities that require permits, consents, and authorizations. | PIU / MoF |
| 1.6 | **CONTINGENT EMERGENCY RESPONSE**1. Ensure that the Contingent Emergency Response Component (CERC) Manual includes a description of the ESHS assessment and management arrangements included in the Emergency Action Plan as established in the ESMF prepared for this Project.
2. Prepare, consult, adopt, and disclose any E&S instrument which may be required for activities under Part 3 of the Project, in accordance with the CERC Manual, the ESMF, and the ESSs, and thereafter implement the measures and actions required under said instruments, within the timeframes specified in said instruments.
 | a) The adoption of the CERC Manual, in form and substance acceptable to the Association is a legal obligation, under Schedule 2, Section D(1)(a) of the Financing Agreement.b) The E&S instruments shall be submitted for the Association’s prior review and no objection, and thereafter adopted and disclosed before carrying out any activity under Part 3 of the Project that requires the preparation of these instruments. Once adopted, the instruments shall be implemented in accordance with their terms, in a manner acceptable to the Association, throughout the implementation of activities under Part 3 of the Project. | The entity/ministry/agency designated by Saint Lucia, for Part 3 of the Project. |
| **ESS 2: LABOR AND WORKING CONDITIONS** |
| 2.1 | **LABOR MANAGEMENT PROCEDURES**a) Develop, consult, adopt and disclose Labor Management Procedures (LMP) agreed during preparation, consistent with the relevant ESSs. b) Update as needed and implement the LMP.. | a) the LMP has already been finalized. b) Implement the LMP throughout Project implementation. | PIU / MoF |
| 2.2 | **GRIEVANCE REDRESS MECHANISM (GRM) FOR PROJECT WORKERS**a) Establish, maintain, and operate a grievance mechanism for Project workers as described in the LMP and consistent with ESS2.b) Incorporate the requirements of the GRM for workers into the bidding documents and the corresponding contracts. | a) the Project has a GRM in place. which shall be maintained it throughout Project implementation.b) Before starting bidding processes and thereafter incorporate in the respective contracts.. | PIU / MoF |
| 2.3 | **OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES**1. Develop and implement Occupational, Health and Safety Plans (OHSPs) as part of the development and implementation of site specific ESMPs, in accordance with relevant guidelines specified in the ESMF and LMP.
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 for each work site/activity.
 | a) Same timeframe as for action 1.2.b.b) Prior to commencing the corresponding bidding process of each works package and thereafter incorporate in the respective contracts.c) Throughout implementation of each individual subproject or respective Project activity.  | PIU / MoF |
| 2.4 | **EMERGENCY PREPAREDNESS AND RESPONSE** Develop and implement Emergency Response Plan (ERP) as part of the site-specific ESMPs, in accordance with the guidelines specified in the ESMF. Ensure workers and contractors are trained to implement the ERP. | Same timeframe as for action 1.2. b. | PIU / MoF |
| 2.5 | **CODE OF CONDUCT** Establish provisions in the bidding documents with consulting firms, contractors and supervision firms to include a Code of Conduct to be signed by all workers, including subcontractors. The Code of Conduct must be based on the format contained in the LMP and should address, among other issues, the risk of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) in the workplace. | Before launching the bidding process. | PIU / MoF |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** |
| 3.1 | **WASTE MANAGEMENT** Develop and implement a waste management plan (WMP) as part of the site-specific ESIAs and ESMPs, in accordance with the guidelines specified in the ESMF | Same timeframe as for action 1.2. b | PIU / MoF |
| **ESS 4: COMMUNITY HEALTH AND SAFETY** |
| 4.1. | **COMMUNITY HEALTH AND SAFETY**Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, site preparation and rehabilitation, management of traffic disruptions during construction works, prevention of COVID-19 and response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF. | Same timeframe as for action 1.2.b  | PIU / MoF |
| 4.2. |  **SEXUAL EXPLOITATION AND ABUSE (SEA) AND SEXUAL HARASSMENT (SH)**Implement sexual abuse and exploitation and sexual harassment (SEA/SH) prevention and response measures, proportionate to the risks of the Project, including availability of a list of services for victims of SEA/SH in the areas of intervention, adoption of the code of conduct by all workers, and adequate treatment of SEA/SH grievances in the Project level GRM, as reflected in the SEP and LMP. These measures shall also be included in site-specific ESMPs. | Throughout Project implementation | PIU / MoF |
| 4.3 | **UNIVERSAL ACCESS**Where technically and financially feasible, civil work designs shall incorporate the concept of universal access as described in the ESMF, including during restoration/replacement of ramps, elevators, and toilets for persons with disabilities. | Same timeframe as for action 1.2. b | PIU / MoF |
| **ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT** |
| 5.1 | **RESETTLEMENT PLANS**a) Prepare, consult, adopt, disclose and implement a consolidated Resettlement Policy Framework and Process Framework (RPF) consistent with ESS5.b) When warranted, prepare, consult, disclose, adopt, and implement resettlement action plans (RAPs) for each subproject or activity under the Project for which the Resettlement and Process Framework (RPF) requires such RAP, in accordance with ESS5, and thereafter adopt and implement the respective RAPs.  | a) An RPF has already been prepared and shall be implemented throughout Project implementation.b) Resettlement Actions Plans shall be submitted for the Association’s no objection, and, thereafter adopted and, implemented prior to commencing the subproject o respective Project activities that involve impacts covered under ESS5. | PIU / MoF |
| 5.2. |  **WILLING SELLER / WILLING BUYER TRANSACTIONS** Provide evidence if “willing buyer-willing seller” transactions are contemplated, to demonstrate that the sale-purchase of land for the implementation of civil works was voluntary and informed, in which the seller had a real opportunity to keep the land and refuse to sell it, without coercion or fear of reprisals, and that the negotiations were based on market prices and will not have any adverse effects on third parties, in accordance with ESS5.  | Submit the evidence to the Association prior to the transaction.  | PIU / MoF |
| 5.3. |  **LAND DONATIONS**Provide evidence for any land donations for investments, in accordance with ESS5, on: a) potential donors have been adequately informed and consulted regarding the Project and the options available to them; b) potential donors are aware that refusal is an option and they have confirmed in writing their willingness to proceed with the donation; c) the amount of land being donated is small and will not reduce the remaining surface area of land of the donor below the necessary amount to maintain their current livelihood levels; d) no relocation of homes is involved; e) it is expected that the donor will benefit directly from the Project, f) for community or collectively owned land, the donation can take place only with the agreement of the individuals who use or occupy the land, g) there exist alternative areas for installation/construction of project infrastructure; and h) besides the legal owner, the occupants or users that will be physically or economically displaced have been consulted and their impacts compensated in accordance with ESS5. | Submit the evidence to the Association prior to the transaction. | PIU / MoF |
| 5.4 | **GRIEVANCE MECHANISM**Implement the GRM included in the SEP and RPF and integrate it into each RAPs, as warranted. A separate log for claims and complaints related to ESS5 shall be maintained. | Throughout implementation of each RAP | PIU / MoF |
| **ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES** |
| 6.1 | **BIODIVERSITY RISKS AND IMPACTS**Include in the ESIA and ESMPs, as needed, measures to manage the potential risks and impacts to biodiversity, in accordance with the ESMF and ESS. | Same timeframe as for action 1.2. b | PIU / MoF |
| **ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES** |
| ESS 7 is not currently relevant. |
| **ESS 8: CULTURAL HERITAGE** |
| 8.1 | **CHANCE FINDS**Develop, adopt, and implement a chance finds procedure as part of each ESMP and in line with the ESMF prepared for the Project  | Incorporate chance-find procedures into the ESMPs to be prepared under Action 1.2b. above, as required under the ESMF. | PIU / MoF |
| 8.2 | **CULTURAL HERITAGE**As part of site-specific ESMPs, carry out screening/assessment of tangible and intangible cultural heritage present in areas which may be affected by Project activities in accordance with requirements specified in the ESMF. If the need for a Cultural Heritage Management Plan (CHMP) is identified, develop, adopt and implement such CHMP, in accordance with the requirements of ESS8. | Same timeframe than for action 1.2. b | PIU / MoF |
| **ESS 9: FINANCIAL INTERMEDIARIES** |
| ESS 9 is not currently relevant. |
| **ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE** |
| 10.1 | **STAKEHOLDER ENGAGEMENT PLAN** 1. Develop, consult, adopt and disclose a Stakeholder Engagement Plan (SEP) and implement it thereafter, consistent with the relevant ESSs.
2. Report on the implementation of the SEP.
 | a) A SEP has already been finalized. Implement the SEP throughout Project implementation.1. Six-monthly reporting as set out in action A above.
 | PIU / MoF |
| 10.2 | **PROJECT GRIEVANCE MECHANISM**1. Establish, publicize, maintain, and operate an accessible grievance mechanism, 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 and those related to SEA/SH, in a manner consistent with ESS10.
2. Report on project-level GRM implementation.
 | 1. A grievance mechanism is already operational. Maintain and operate the mechanism throughout Project implementation.
2. Report on GRM as part of the six‐monthly reports required under action A above.
 | PIU / MoF |
| **CAPACITY SUPPORT (TRAINING)** |
| CS1 | Training to be provided to PIU staff on:* ESF requirements
* Stakeholder engagement and GRM
* SEA/SH
* Occupational health and safety including emergency preparedness and response
 | Training will continue throughout Project implementation. | PIU / MoF (with technical support of the Association) |
| CS2 | Training to be provided to Project contractors/workers on:* Environmental and social requirements including E&S documents.
* Waste management
* Occupation Health and safety for the workforce including emergency preparedness and response.
* Infectious Disease Prevention and Response
* Community health and safety
* SEA/SH
* Stakeholder engagement and GRM
 |  Prior to the start of activities. | PIU / MoF |