

# Caribbean Efficient and Green-Energy Buildings Project (P179519)

## Environmental and Social Management Framework (ESMF)

October 2025

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 Guyana

Guyana Energy Agency



## Table of Contents

<b>Table of Contents</b>	<b>2</b>
<b>Abbreviations</b>	<b>4</b>
<b>Executive Summary</b>	<b>5</b>
<b>Introduction</b>	<b>7</b>
<b>Project Description, Development Objective, and Components</b>	<b>8</b>
<b>Environmental and Social Policies, Regulations and Laws</b>	<b>10</b>
<i>World Bank Standards</i>	10
<i>National Legal Frameworks</i>	11
Grenada's Legal Frameworks	11
Saint Lucia's Legal Frameworks	14
Guyana's Legal Frameworks	16
<i>National Environmental and Social Assessment and Permitting</i>	19
<b>Environmental and Social Context</b>	<b>22</b>
<i>Grenada Environmental and Social Context</i>	22
<i>Saint Lucia Environmental and Social Context</i>	23
<i>Guyana Environmental and Social Context</i>	24
<b>Potential Environmental and Social Risks</b>	<b>24</b>
<b>E&amp;S Process</b>	<b>26</b>
<i>Implementation Arrangements</i>	37
<i>Proposed Training and Capacity Building</i>	40
<i>Estimated Budget</i>	41
<b>Stakeholder Engagement, Disclosure and Consultations</b>	<b>41</b>
<b>ANNEX 1: PROPOSED SUB-PROJECT SITES</b>	<b>43</b>
<b>ANNEX 2: EXCLUSION LIST</b>	<b>45</b>
<b>ANNEX 3: ENVIRONMENTAL AND SOCIAL SCREENING FORM</b>	<b>46</b>
<b>ANNEX 4: ENVIRONMENTAL AND SOCIAL CODES OF PRACTICE (ESCOPs) FOR INFRASTRUCTURE SUBPROJECTS</b>	<b>48</b>
<b>ANNEX 5: ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) TEMPLATE</b>	<b>51</b>
<b>ANNEX 7: CODE OF CONDUCT TEMPLATE (PIU STAFF)</b>	<b>63</b>
<b>ANNEX 8: CODE OF CONDUCT TEMPLATE (CONTRACTOR'S PERSONNEL)</b>	<b>67</b>
<i>Caribbean Efficient and Green-Energy Buildings Project (P179519)</i>	
<i>Environmental and Social Management Framework (ESMF)</i>	
<i>DRAFT</i>	<b>2</b>

<b>ANNEX 9: INCIDENT FORM</b>	<b>70</b>
<b>ANNEX 10: OUTLINES OF OTHER RELEVANT MANAGEMENT PLANS</b>	<b>74</b>
<b>ANNEX 11: CHANCE FIND PROCEDURES</b>	<b>78</b>
<b>ANNEX 12: BI-ANNUAL PROJECT PROGRESS REPORTING TEMPLATE</b>	<b>79</b>
<b>ANNEX 13: E&amp;S MONITORING AT SUB-PROJECT LEVEL FORM</b>	<b>84</b>

## Abbreviations

C-ESMP	Contractor's ESMP
DRE	Distributed renewable energy
DPV	Distributed Photovoltaic
ESCOPE	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)
GEA	Guyana Energy Agency
GHG	Greenhouse gas
GIIP	Good international industry practice
GRENLEC	The Grenada Electricity Services Ltd.
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
PURC	Public Utilities Regulatory Commission (Grenada)
PV	Photovoltaic
RAP	Resettlement Action Plan
RCA	Root Cause Analysis
RE	Renewable energy
SEA/SH	Sexual exploitation and abuse/sexual harassment
SEP	Stakeholder Engagement Plan
SIDS	Small Island Developing States
SoP	Series of Projects
TA	Technical Assistance
ToR	Terms of Reference
WB	World Bank

## Executive Summary

Despite having significant indigenous renewable energy resources in the Caribbean Region, the dependence on imported fossil fuels is one of the greatest challenges impacting energy security. Between the Organization of Eastern Caribbean States (OECS) countries, Grenada and Saint Lucia are the most vulnerable with less than 1.5% of electricity production from renewable energy (solar), and over 96% of the generation capacity from diesel gensets despite having significant indigenous renewable energy resources. Similarly, Guyana is 97% dependent on generation from fossil based heavy fuel oil with only 3% from renewable energy.

The Caribbean Efficient and Green Energy Buildings Program is a regional Series of Projects (SoP) designed to address common challenges in the energy sector that countries in the region face. The Caribbean Efficient and Green-Energy Buildings Project (hereafter referred to as the Project) is the first proposed project in the series and will include Grenada, Saint Lucia, and Guyana. The World Bank will be supporting the OECS Commission at the regional level as well as Grenada's Ministry of Climate Resilience, the Environment and Renewable Energy, Saint Lucia's Ministry of Infrastructure, Ports, Transport, Physical Development and Urban Renewal and Guyana's Energy Agency (GEA) at the national levels in implementing the Project.

**Project Development Objective (PDO):** The PDO is to save energy, increase the use of renewable energy in public buildings and facilities, and enhance the regulatory framework for investments in energy efficiency and renewable energy in participating Caribbean countries. The project comprises of the following components:

**Component 1: Investment in EE measures and distributed RE systems in the public sector.** This component will finance investments in EE retrofits and the installation of new DRE systems in public buildings and other facilities, along with technical assistance for identification, design, and implementation supervision of the EE and RE investment. It will also support grid integration of distributed photovoltaic (DPV) systems. The EE retrofits may include active and passive EE measures, improvements in building-control systems and safe disposal of used equipment and materials. The Project envisages investment in EE and DRE for about 500 buildings, across three participating countries, to be implemented in batches until all allocated funds have been utilized. Component 1 will build resilience in the country's power system by reducing reliance on imported fossil fuels, through substantial EE measures and integration of distributed RE into the system. Distributed RE and battery storage, and utility scale BESS, will also build resilience against power outages in the grid due to extreme climate events by supporting a continuous and more reliable electricity service. Subproject eligibility criteria at the screening stage will include confirmation from the energy assessment/audits that the proposed measures will result in an estimated energy savings of 20 percent or more and a maximum payback period of 20 years for the overall EE and DRE investment. Component 1 will consist of three subcomponents, one for each of the participating countries.

**Component 2: Regulatory Framework Development.** This component will have four subcomponents. Subcomponents 2.1, 2.2, and 2.3 will support the development of regulatory frameworks for scaling up EE and RE investments in Saint Lucia, Grenada, and Guyana, respectively, and promoting harmonization with relevant regional regulations and rules. The subcomponent for each country may include: (i) support for the development of tariff policies and regulations on DPVs, such as net billing, grid codes, and a standardized contract for RE; (ii) policies and regulations and guidelines for EE building retrofits, EE equipment and appliances; Minimum Energy Performance Standards, EE labeling, electric vehicles and charging infrastructure, and existing buildings' benchmark regulations, and (iii) other activities, including climate risk assessments, studies and capacity building, to develop and strengthen the national regulatory frameworks in harmonization with regional regulations and rules. Subcomponent 2.4 will support multiple regional regulatory and policy development activities. An assessment was carried out to confirm the Caribbean Centre for Renewable Energy and Energy Efficiency (CCREEE) eligibility to receive the IDA grant from Regional Window and its capability to carry this sub-component. The activities will include: (i) updating of the existing Caribbean Community (CARICOM) Regional Energy Efficiency Building Code; (ii) design of a regional waste-

management strategy and regulation for waste streams from EE and RE investments; (iii) the implementation of other relevant aspects of regional regulatory development; dissemination and capacity building activities to facilitate EE and RE market expansion; and (iv) provision of technical support to the pooled procurement process.

**Component 3: Support to Pooled Procurement and Project Implementation, Capacity-Building and Gender Program.** Subcomponents 3.1, 3.2, and 3.3 will support project implementation in Saint Lucia, Grenada, and Guyana, respectively, as well as the gender-related training program in Guyana. Subcomponent 3.4 will support pooled procurement and communications with stakeholders, as well as the establishment of a regional Project Implementation Unit (PIU) and related capacity building.

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 follows the World Bank's Environmental and Social Framework (ESF) as well as the respective national laws and regulations of Grenada, Saint Lucia and Guyana. 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
- Mold, affecting overall air quality
- Pest control

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 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 substantial or 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 or in the case of Guyana, a Social and Environmental Officer 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.

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.

In Grenada and Saint Lucia, CLOs for each sub-project 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. In Guyana, this role will be carried out by the Social and Environmental Officer.

Sub-project focal points in all Project countries will also be designated to provide daily on-site supervision; help disseminate project information and gather grievances and feedback from stakeholders. These focal points, who will most likely be building managers and engineers, will be trained on maintenance of the newly installed equipment and as well as related fire and life safety issues.

This ESMF should be read together with other plans prepared for the Project, including the Stakeholder Engagement Plan (SEP) ([Grenada](#), [Saint Lucia](#), [Guyana](#)), the Labor Management Procedures (LMP) ([Annex 6](#)) and the Environmental and Social Commitment Plan (ESCP).

## Introduction

Despite having significant indigenous renewable energy resources in the Caribbean Region, the dependence on imported fossil fuels is one of the greatest challenges impacting energy security. In 2017 around 87 percent of total energy consumption was sourced from imported petroleum products, most of which was used for electricity generation. Dependency on imported oil makes the countries in the region vulnerable to price shocks and volatile global energy markets.

Between the Organization of Eastern Caribbean States (OECS) countries, Grenada and Saint Lucia are the most vulnerable with less than 1.5% of electricity production from renewable energy (solar), and over 96% of the generation capacity from diesel gensets despite having significant indigenous renewable energy resources. For many OECS countries, electricity generation relies on fleets of generators running on diesel or heavy fuel oil and are constrained by their age and inadequate maintenance. The power grids in the countries are old, and subject to insufficient investment and inadequate maintenance, exposing them to climate hazards.

Guyana has some of the highest electricity rates in the Americas and is about 97% dependent on imported fossil fuels with the remaining 3% from renewable energy (solar and bagasse). Using natural gas as a bridge away from heavy fuel oil, followed by the Amaila Falls Hydropower Project and an expansion of solar, wind and biomass, Guyana will see a massive expansion of renewable energy across the country. By 2030, energy use can increase five-fold with greenhouse gas emissions staying approximately flat – one of the world's highest levels of decoupling of economic growth and fossil fuel use for energy. Without this transition away from today's energy sources, both greenhouse gas emissions and consumer costs will stay very high because of a reliance on imported heavy fuel oil (HFO) and diesel for electricity generation in the 12 public grids operated by Guyana Power and Light (GPL) and Hinterland Electrification Company Inc (HECI). Expenditure on these fuels was approximately US\$ 150 million in 2021.

The Caribbean Efficient and Green Energy Buildings Program is a regional Series of Projects (SoP) designed to address these common challenges in the energy sector that countries in the region face. The SoP's programmatic framework is scalable, allowing countries in the region to join at different times.

The proposed first project in the series, the Caribbean Efficient and Green-Energy Buildings Project (hereafter referred to as the Project) will support investments in energy efficiency (EE) measures and distributed solar photovoltaic (DPV) systems installed on rooftops or in public spaces throughout Grenada, Saint Lucia, and Guyana. At the regional level, the Project will support technical assistance (TA) activities to strengthen institutional and regulatory frameworks around EE and renewable energy (RE) and to support women in the energy sector.

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 Guyana. 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](#), [Guyana](#)), the Labor Management Procedures (LMP) ([Annex 6](#)) and the Environmental and Social Commitment Plan (ESCP).

## Project Description, Development Objective, and Components

The Project will support investment and technical assistance for energy efficiency (EE) retrofitting and the installation of distributed renewable energy generation (DRE) systems in public buildings and other facilities in Grenada, Guyana, and Saint Lucia. These structures may include central and regional administrative buildings, universities and schools, hospitals and clinics, stadiums, airports, and water supply and sewage utilities. To benefit from economies of scale, the participating countries will procure these EE and DRE investments in public buildings through a process called pooled procurement with support from the Organization of Eastern Caribbean States (OECS). The Project will also include technical assistance to address regulatory and technical constraints to EE and renewable energy (RE) investments, and build capacity in the planning, implementation, and sustainable operation of these investments.

**Project Development Objective (PDO):** The PDO is to save energy, increase the use of renewable energy in public buildings and facilities, and enhance the regulatory framework for investments in energy efficiency and renewable energy in participating Caribbean countries. The project comprises of the following components:

**Component 1: Investment in EE measures and distributed RE systems in the public sector.** This component will finance investments in EE retrofits and the installation of new DRE systems in public buildings and other facilities, along with technical assistance for identification, design, and implementation supervision of the EE and RE investment. It will also support grid integration of distributed photovoltaic (DPV) systems. The EE retrofits may include active and passive EE measures, improvements in building-control systems and safe disposal of used equipment and materials. The Project envisages investment in EE and DRE for about 500 buildings, across three participating countries, to be implemented in batches until all allocated funds have been utilized. Component 1 will build resilience in the country's power system by reducing reliance on imported fossil fuels, through substantial EE measures and integration of distributed RE into the system. Distributed RE and battery storage, and utility scale BESS, will also build resilience against power outages in the grid due to extreme climate events by supporting a continuous and more reliable electricity service. Subproject eligibility criteria at the screening stage will include

confirmation from the energy assessment/audits that the proposed measures will result in an estimated energy savings of 20 percent or more and a maximum payback period of 20 years for the overall EE and DRE investment. Component 1 will consist of three subcomponents, one for each of the participating countries, as described below.

*Subcomponent 1.1: Saint Lucia's investment in EE measures and distributed RE systems* This subcomponent will support the implementation of subprojects to improve EE performance and increase use of RE in selected public buildings and facilities in Saint Lucia. It will also provide technical and operational assistance for identification, design, construction, and operation phases of the subprojects. A Global Environment Facility (GEF) grant will co-finance activities focused on subprojects in Saint Lucia Water and Sewerage Company Inc. (WASCO) and selected grid integration to support investment in DPVs. The subcomponent will also enhance resilience to climate risks and strengthen the adaptive capacity of the country's power system.

*Subcomponent 1.2: Grenada's investment in EE measures, distributed RE systems and variable RE Integration.* This subcomponent will be divided into two parts as follows:

- *Subcomponent 1.2.a:* It will support the Implementation of subprojects to improve EE and increase use of RE in selected public buildings and facilities in Grenada along with the provision of technical and operational assistance for identification, design, construction, and operation phases of the subprojects. This sub-component will also include selected investments for the integration of DPVs in the power grid.
- *Subcomponent 1.2.b.* It will cover technical support and investment for: (i) installation of utility-scale BESS at the Maurice Bishop International Airport (MBIA) and (ii) associated transmission system upgrade for connecting the BESS to the national grid. The Grenada Electricity Services Ltd. (GRENLEC) is the implementing agency for this activity. The transmission system upgrade will include: (i) a new transmission substation at MBIA to house the BESS; (ii) upgrading of an existing substation at Grand Anse and two short 33 kV transmission lines (one overhead and one underground) connecting these two substations.

*Subcomponent 1.3: Guyana's investment in EE measures and distributed RE systems.* This sub-component will support the implementation of subprojects to improve EE and increase use of RE in selected public buildings and facilities in Guyana. It will also provide technical and operational assistance for identification, design, construction, and operation phases of the subprojects. These activities will also enhance resilience to climate risks and strengthen the adaptive capacity of the country's power system.

**Component 2: Regulatory Framework Development.** This component will have four subcomponents. Subcomponents 2.1, 2.2, and 2.3 will support the development of regulatory frameworks for scaling up EE and RE investments in Saint Lucia, Grenada, and Guyana, respectively, and promoting harmonization with relevant regional regulations and rules. The subcomponent for each country may include: (i) support for the development of tariff policies and regulations on DPVs, such as net billing, grid codes, and a standardized contract for RE; (ii) policies and regulations and guidelines for EE building retrofits, EE equipment and appliances; Minimum Energy Performance Standards, EE labeling, electric vehicles and charging infrastructure, and existing buildings' benchmark regulations, and (iii) other activities, including climate risk assessments, studies and capacity building, to develop and strengthen the national regulatory frameworks in harmonization with regional regulations and rules. Subcomponent 2.4 will support multiple regional regulatory and policy development activities. An assessment was carried out to confirm An assessment was carried out to confirm the Caribbean Centre for Renewable Energy and Energy Efficiency (CCREEE) eligibility to receive the IDA grant from Regional Window and its capability to carry this sub-component. The activities will include: (i) updating of the existing Caribbean Community (CARICOM) Regional Energy Efficiency Building Code; (ii) design of a regional waste-management strategy and regulation for waste streams from EE and RE investments; (iii) the implementation of other relevant aspects of regional regulatory development; dissemination and capacity building activities to facilitate EE and RE market expansion; and (iv) provision of technical support to the pooled procurement process.

**Component 3: Support to Pooled Procurement and Project Implementation, Capacity-Building and Gender Program.** Subcomponents 3.1, 3.2, and 3.3 will support project implementation in Saint Lucia, Grenada, and Guyana, respectively, as well as the gender-related training program in Guyana. Subcomponent 3.4 will support pooled procurement and communications with stakeholders, as well as the establishment of a regional Project Implementation Unit (PIU) and related capacity building.

*Subcomponent 3.1: Saint Lucia's Project Implementation Support, and Capacity-Building.* This subcomponent will support strengthening the capabilities of the national PIU, stakeholder engagement and capacity-building in planning, execution and operation of EE and distributed RE investment. It will also provide technical and operational assistance for coordination, financial management, procurement, environmental and social risk and impact management, monitoring and evaluation, and auditing of the Project.

*Subcomponent 3.2. Grenada's Project Implementation Support, and Capacity-Building.* It will support strengthening the national PIU to manage investment in: (i) EE measures and distributed RE systems in public buildings; and (ii) the installation of a utility-scale BESS and the upgrading of the transmission system. This support will encompass: (i) stakeholder engagement and capacity-building in planning, execution and operation investment; (ii) provision of technical and operational assistance for coordination, financial management, procurement, environmental and social risk and impact management; (iii) monitoring and evaluation, and (iv) auditing of the Project.

*Subcomponent 3.3. Guyana's Project Implementation Support, Capacity-Building and Gender Program.* It will support strengthening the capabilities of the national PIU, stakeholder engagement and capacity-building for: (i) planning, execution and operation of EE and distributed RE investment; (ii) implementation of a gender program to increase female competency and employment in the energy sector; and (iii) provision of technical and operational assistance for coordination, financial management, procurement, environmental and social risk and impact management, monitoring and evaluation, and audit of the Project.

*Subcomponent 3.4. Support to Pooled Procurement, Communication and Capacity.* This subcomponent will support: (i) establishment and operation of a regional PIU; (ii) provision of technical assistance for implementing a pooled procurement for the participating countries; (iii) creation of stakeholder communication programs at the regional level; (iv) provision of capacity-building support for procurement and dissemination of regional regulations on EE and RE; and (v) facilitation of harmonized regulations, standards and tools for EE and DRE. The OECSC is the implementing agency for this sub-component.

A Regional PIU with project officers will be created under its Environmental Sustainability Division within the OECS Commission. The Regional PIU will provide the Pooled Procurement services (PPS) to the participating countries for their investment in EE and DPVs and implement the regional capacity building activities financed under Component 3, by providing comprehensive procurement training and resources, *inter alia*, on effectively utilizing framework agreements for building retrofits and contract management.

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 1 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. The regional waste management strategy will recommend solutions for the safe treatment and disposal of waste including hazardous waste.
ESS4 Community Health and Safety	ESS4 is relevant. Adverse impacts on the health and safety of surrounding communities, building tenants and staff may occur while works are being undertaken in the buildings or at utility-scale battery site(s).
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, if a sub-project requires land acquisition, a resettlement action plan (RAP) will be prepared and implemented. A resettlement framework (RF) has been prepared.
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 relevant as some of the buildings under consideration are designated as historically important public buildings.
ESS10 Stakeholder Engagement and Information Disclosure	ESS10 is 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 Guyana are committed to meeting their National Determined Contribution (NDC)<sup>1</sup> 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, which set the target of reducing of greenhouse gas emissions by 30% of the 2010 level by 2025 of which 20% come from implementing EE measures and 10% from adding RE into the production mix.

In January 2021, Saint Lucia published its updated NDC with increased mitigation target of 7% reduction of GHG relative to 2010 by 2030 in the energy sector (compared with 2% in the first NDC submission).

Guyana's 2015 NDC covers areas of land use, energy, and climate adaptation. Guyana has committed to eliminating its near complete dependence on fossil fuels. Using natural gas as a bridge away from heavy fuel oil, followed by an expansion of hydropower, solar, wind and biomass, Guyana will see a massive expansion of renewable energy across the country, with a target of 59% by 2030.

<sup>1</sup> NDCs are country-level climate action plans to cut emissions and adapt to climate impacts. Countries set targets for mitigating the greenhouse gas emissions that cause climate change and for adapting to climate impacts. The plans define how to reach the targets, and elaborate systems to monitor and verify progress so it stays on track. NDCs help countries shift to development that is greener and more sustainable and provides an opportunity for rethinking how a society produces and consumes.

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 Guyana 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 2016/2017, 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 became operational in July 2019. It is responsible for developing the regulatory framework to implement the ESA. The PURC has developed a modern tariff setting methodology and regulations on competitive procurement for RE generation, in line with the ESA's principles. To promote the scaling up of RE, in April 2021, PURC launched a pilot self-generation program and based on its results, plans to develop a more extensive program.

**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:** 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.

**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 Bill:** While it does not have legislation in place, Grenada introduced its Data Protection Bill in 2023 to establish a comprehensive framework for managing the processing of personal data. More specifically, the bill provides for data subject rights such as the right of access to personal data, the right to notice and time when access is requested, the right to denial of access to personal data, and the right to rectification of personal data. The bill establishes seven data protection principles, including data integrity and disclosure. Lastly, the bill provides for the creation of the Information Commission which shall be formed by three members having expertise in data protection and will have the following functions, among others:

- monitoring compliance by public and private bodies with the provisions of the bill, including issuing notices;
- advising public and private bodies of their obligations under the bill;
- receiving and investigating complaints about alleged violations of data subject rights, and in respect thereof make reports to complainants;
- undertaking educational programs to promote understanding of the bill; and
- enforcement functions.

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	✓		✓				
Carriacou Land Settlement and Development Act				✓	✓		
Constitution Order 1973	✓			✓			
Data Protection Bill, 2023							✓
Employment Act of 1999	✓		✓				
Environmental Impact Assessment (EIA) Legislation				✓		✓	
Environmental Management Act, 2014		✓			✓		
Grenada Integrated Water Resources Management Plan 2019		✓			✓		
Grenada National Hazard Mitigation Policy					✓		

Grenada National Land Policy				✓		
Grenada National Water Policy 2019		✓		✓		
Grenada Solid Waste Management Authority Act		✓				
Grenada Mitigation Technology Needs Assessment Barrier Analysis and Enabling Framework (2018)	✓					
Grenville Local Area Plan				✓	✓	✓
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		✓		✓		
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				✓		
National Heritage Protection Act				✓	✓	
National Parks and Protected Areas Act				✓	✓	
National Sustainable Development Plan 2020-2035				✓		
National Trust Act				✓		
National Water Policy 2020	✓					
National Water and Sewerage Authority Act		✓		✓		
Non-Biodegradable Waste Control Act, 2018		✓				
Pesticides Control Act		✓		✓		
Physical Planning and Development Control Act, 2002		✓		✓	✓	✓
Public Health Act		✓	✓			
Roadmap on Building a Greener Economy for Sustainable Development for Carriacou and Petite Martinique 2012	✓					
Sauteurs Local Area Plan				✓	✓	✓
Strategic Program for Climate Resilience		✓		✓		
The Factories Act	✓		✓			
The Land Settlement Act (CAP 161) of 1933				✓		
Waste Management Act 2001		✓			✓	
Water Quality Act		✓				

## Saint Lucia's Legal Frameworks

**National Energy Policy (2010):** The objective of the National Energy Policy is to create an enabling environment, both regulatory and institutional, for the introduction of high levels of indigenous RE to the national energy mix, thus achieving greater energy security, independence, and price stability. The National Energy Policy of 2010 built on the Sustainable Energy Plan from 2002 to ensure Saint Lucia a safe, secure, affordable, and clean energy supply. It lays out the framework for the usage of renewable energy sources and reducing carbon emissions and identifies short and medium-term renewable targets.

**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		✓			✓		

## Guyana'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.

**Low Carbon Development Strategy (LCDS):** In 2009, Guyana launched the first Low Carbon Development Strategy (LCDS), setting out a vision for inclusive, sustainable development - while simultaneously maintaining the country's forests, about 85% of the country's territory, to help meet some of the most urgent challenges the world faces. The

updated 2030 LCDS sets out how Guyana can stay true to the vision set out in 2009. The LCDS 2030 outlines steps for creating a model for avoiding deforestation and maintaining forests, while at the same time growing the economy five-fold over 10 years and keeping energy emissions flat; investing in urban, rural and Amerindian development; protecting the coast and hinterland from climate change; creating jobs in a suite of low carbon sectors; aligning the education and health sectors with low carbon development and integrating Guyana's economy with its neighbors. The LCDS 2030 sets out four inter-linked objectives for Guyana:

- Value Ecosystem Services
- Invest in Clean Energy and Stimulate Low Carbon Growth
- Protect Against Climate Change and Biodiversity Loss
- Align with Global Climate and Biodiversity Goals

**Constitution of the Cooperative Republic of Guyana Act 1980:** Guyana's commitment to the environment and sustainable development is enshrined in the Constitution which states that "Every citizen has a duty to participate in activities to improve the environment and protect the health of the nation" and "In the interest of the present and future generations the state will protect rational use of its flora and fauna and will take all appropriate measures to conserve and improve the environment" (GoG, Constitution of the Cooperative Republic of Guyana Act, 1980). Further, the Constitution charges that the wellbeing of the nation depends on preserving clean air, fertile soils, pure water and the rich diversity of plants, animals, and ecosystems.

**Guyana Energy Agency Act 1997:** This Act came into effect in 1997 and established the Guyana Energy Agency (GEA), which falls under the purview of the Office of the Prime Minister. The GEA has responsibility for advising and recommending to the subject minister methods to secure effective management of energy and sources of energy, and for the development and utilization of alternative sources of energy. The Agency has responsibility for development and implementation of the National Energy Policy and acts as a consultative body to the minister as it relates to instructions for compliance in energy matters. Additionally, the GEA is responsible for conducting research into more effective sources of energy and utilization of energy.

**Electricity Sector Reform Act 1999:** This Act established the licensing requirements to be adhered to by a commercial entity supplying electricity to any person, premises, or geographical areas (GoG, Electricity and Reform Act, 1999). The Act further sets out the conditions which must be satisfied for the issuance of a license to an Independent Power Producer (IPP) for the generation of electricity for sale to a public supplier.

**Environmental Protection (EP) Act 1996:** The EP Act under which the Environmental Protection Agency (EPA) was established provides for the management, conservation, protection, and improvement of the environment (EPA, Environmental Protection Act, 1996). It also has provisions for the prevention or control of pollution, assessment of the impact of economic development on the environment and the sustainable use of natural resources. The Act mandates the conduct of Environmental Impact Assessments for projects with potential significant impacts on the environment. The EP Act also allows for the development of regulations to govern environmental protection in Guyana. In 2000, five different regulations were enacted under the Act as follows:

- Environmental Protection Authorizations Regulations
- Environmental Protection Water Quality Regulations
- Environmental Protection Air Quality Regulations
- Environmental Protection Hazardous Wastes Management Regulations
- Environmental Protection Noise Management Regulations

**Environmental Protection (Authorization) Regulations 2000:** The Regulations outlines the procedure and requirements for issuing Environmental Authorizations (Permit) for any developmental activity which may have adverse impacts on the environment (EPA, Environmental Protection (Authorisation) Regulations, 2000). Due to the nature of the proposed project and the potential negative impacts that the installation of transmission lines may have on the environment if not properly managed, the Project may be required to have an Environmental Authorization which will stipulate permitted conditions for ensuring and maintaining environmental integrity of the area before the commencement of activities and throughout the life of the project.

**Environmental Protection (Water Quality) Regulations 2000:** The Regulations was established to protect the country's inland and coastal water resources by controlling and managing effluent discharge (EPA, Environmental Protection (Water Quality) Regulations, 2000). These regulations require that any developer who is desirous of commencing any operation, construction, modification and/or extension of a facility which discharges or has the potential to discharge effluent must first apply for an Environmental Authorization. The regulations further state that effluents discharged in inland/ coastal water or land shall not exceed established discharge parameter limits set by the Guyana National Bureau of Standards (GNBS). The provisions reiterate that there must be the establishment of sampling points; effective record keeping, reporting on effluent discharges, water quality and biological integrity; management of spills/accidental discharges and encouragement of proper disposal/treatment of effluents discharge. This project, therefore, will ensure that there is adherence to the water quality regulations, where necessary, to safeguard the environment and ensure that the project activities are conducted in keeping with the legal requirements of the country.

**Environmental Protection (Air Quality) Regulations 2000:** The Regulations outlines the allowable amount of air pollutants which may be emitted into the atmosphere (EPA, Environmental Protection (Air Quality) Regulations, 2000). The regulations require that any developer involved in any construction, installation, operation, modification and/or extension of any facility that emits air contaminant must apply for an environmental authorization from the EPA. The regulations also include the air contaminants for which parameter limits are to be established.

**Environmental Protection (Noise Management) Regulations 2000:** The Regulations seeks to manage and control noise emission levels within Guyana. According to these regulations, it is required that any Developer involved in any construction, installation, operation, modification and/or extension of a facility that emits noise must apply for an environmental authorization from the EPA (EPA, Environmental Protection (Noise Management) Regulations, 2000). The regulations also stipulate that noise decibel levels are not to be greater than the established permissible noise levels/limits of the GNBS which have been adopted by the EPA.

**State Lands Act 1903:** The Act was enacted to provide for the proper regulation of public lands, rivers and creeks of the state (GoG, State Lands Act, 1903, 1903). The Act was amended in 1929 and 1953, and later consolidated on January 01, 2012. All state lands fall under the jurisdiction of the Guyana Lands and Surveys Commission (GLSC) which is a national-level institution established on June 01, 2001, through the implementation of the Guyana Lands and Surveys Act, 1999. The GLSC is the custodian of all public lands, rivers and creeks of Guyana and oversees the administration of lands for the development and benefit of landowners and the state.

**National Land Use Plan 2013:** The GLSC has developed a draft National Land Use Plan (NLUP) 2013 which "provides a strategic framework to guide land development in Guyana.". A draft National Land Use Policy is in existence and provides the policy context for all land uses in the country. Regional land use plans are being developed through a phased process to ensure more localized and contextual land use planning and management.

**Environmental Protection (Hazardous Waste Management) Regulations 2000:** The Regulations was developed with the primary aim of protecting the environment by controlling the discharge of hazardous waste materials. The regulations require that any Developer involved in any operations that generates, transports, treats, stores or disposes of hazardous waste must apply for an Environmental Authorization (EPA, Environmental Protection (Hazardous Wastes Management) Regulations, 2000). The regulations also outline the provisions for reporting, record keeping, emergency preparedness planning and transportation of hazardous waste, while at the same time encouraging that Developers utilize appropriate disposal and/or treatment mechanisms of hazardous waste identified in the regulations.

**The Data Protection (Amendment) Bill 2023:** The Data Protection Bill regulates the collection, keeping, processing, use and dissemination of personal data. It sets a statutory framework to safeguard against rights to data protection. The Bill prescribes that a body be established, recognized as the Data Protection Office, which shall be responsible for the administration and implementation of the Act. The President will also be empowered to appoint a Data

Protection Commissioner. The Bill was drafted in keeping with the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights.

**Table 4 Other Guyana legislation, policies and plans relevant to the Project**

National Laws, Policies and Plans	ESS2	ESS3	ESS4	ESS5	ESS6	ESS8	ESS10
Acquisition of Lands for Public Purposes Act				✓			
Acquisition of Land (Land Settlement) Act				✓			
Acquisition of Lands (Not Beneficially Occupied) Act				✓			
Deeds Registry Authority Act				✓			
Electricity Sector Reform Act			✓				
Employment Exchanges Act		✓					
Employment of Young Persons and Children Act	✓						
Energy Sector (Harmonisation of Laws) Act 2002		✓					
Environmental Protection Act		✓			✓		
Environmental Protection (Litter Enforcement) Regulations 2013		✓	✓		✓		
Environmental Protection (Litter Enforcement) Regulations 2013 Litter Regulations		✓	✓		✓		
Environmental Protection (Litter Enforcement) Regulations 2013 (EPA AIR Pollution Regs)		✓	✓		✓		
Environmental Protection (Litter Enforcement) Regulations 2013 Authorisations Regulations 2000		✓	✓		✓		
Environmental Protection (Litter Enforcement) Regulations 2013 Hazardous Wastes Regulations		✓	✓		✓		
Environmental Protection (Litter Enforcement) Regulations 2013 EPA Noise Management Regs		✓	✓		✓		
Environmental Protection (Litter Enforcement) Regulations 2013 EPA Water Quality Regs		✓	✓		✓		
Geological Survey Act				✓			
Guyana Energy Agency Act		✓					
Guyana Lands and Surveys Commission Act				✓			
Guyana Water Authority Act					✓		
Hydro-Electric Power Act			✓		✓		
Industries Aid and Encouragement Act	✓						
Industrial Training Act		✓					
Labour Act		✓					
Lands Department Act				✓			
Land Registry Act				✓			
Land Registry (Validation of Awards) Act				✓			
Land Surveyors Act				✓			
Public Lands (Private Roads) Act				✓			
Public Utilities Commission Act			✓				
Regional Development Authorities Act		✓	✓				✓
State Lands Act					✓		
State Lands Resumption Act					✓		
State Planning Commission Act					✓		
Title to Land (Prescription and Limitation) Act					✓		
Trade Unions Act			✓				
Trade Union Recognition Act		✓					
Wages Councils Act		✓					
Water and Sewerage Act			✓				

## 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 ESIAAs. Schedule III of the Planning Act lays out 23 types of development which require an ESIA by law. Development of land (as defined) requires written permission from the PDA and the PDA may require an environmental and social impact assessment report in addition to specified information to be provided by an applicant.

**Grenada's Net Metering Program:** Grenada has a Self-Generator program that employs a net metering compensation mechanism. The Self-Generator program allows residential and commercial entities to install renewable energy systems with capacity up 120% and 60% of their average daily consumption respectively. Subscribers to the program consume their generated energy before exporting energy surplus to Grenada Electricity Services Ltd. (GRENLEC). Under the net metering mechanism, self-generators are credited for their excess exports at the renewable energy rate. Conversely, if the self-generators consumption from the grid exceeds their exports, they pay the prevailing retail energy rate as applicable to the customer's class for net energy withdrawn from the grid. The process of becoming a Self-Generator follows:

- Citizens and businesses apply to the Public Utilities Regulatory Commission (PURC) for a Self-Generator Permit. The Self-Generator application form is accompanied by application and permit fee, a copy of the applicant's most recent electric bill, a single-line diagram of the proposed system, and technical specifications of the equipment to be used.
- The system application is reviewed and relayed to the Minister in charge of public utilities for final approval for the issuance of a Self-Generator Permit.
- Upon issuance of the Self-Generator Permit and following the installation of the approved system, the Electrical Inspectorate inspects the system to ensure it meets national standards.
- Citizens/businesses sign the Net Metering Agreement for Self-Generation (SG) Systems. This Tri-Party Agreement is between the Self-Generator, GRENLEC, and the PURC.
- GRENLEC inspects the system to ensure that it meets their interconnection requirements prior to interconnecting the system to the national grid.

The Self-Generator program incentivizes Grenadians to invest in renewable energy systems as they can financially benefit from generating and using all their energy demand and selling their excess energy to the grid, hence reducing their reliance on the Utility.

**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 renovations and electrical upgrades 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 Lucia's Net Metering Program:** Saint Lucia has a net metering program that serves distributed generators, which are solar photovoltaic systems installed by commercial and domestic customers. In 2009, LUCELEC began a program to study the impact of solar PV on grid operations, safety, and cost. The program's outcome is a detailed plan that will outline how to best combine conventional and renewable energy technologies into the national electricity grid. The new program will involve receiving credit from utility companies, rather than money so that there is no taxable income. When the electricity produced by the system exceeds the customer's consumption, Saint Lucia' National Utilities Regulatory Commission (NURC) will determine the rates to be paid for the electricity. This rate is based on avoided cost and external benefits.

Under the current net metering program, an application procedure is in place for persons or businesses wishing to generate electricity through grid interconnection of systems beyond the set capacity limits with written justification for the application. In order to install a PV system in Saint Lucia, citizens and businesses must first get permission from the NURC. The applicant or a representative on their behalf is required to apply to the NURC. This application requires the applicant to input general information about themselves, details about the system including photovoltaic and inverter information as well as land registry information. Other documents including the following are required to be submitted.

- Electrical Schematic of PV system
- Authorization Letter
- Land Register
- Certificate of Incorporation (For Businesses)
- Certificates of Conformity
- Copy of LUCELEC Electricity Bill

An application checklist is also required to be submitted along with the application form, both of which can be downloaded on the NURC's website. The document must be submitted to the NURC via email, delivered in person or sent via registered post with acknowledgement of receipt. The time limit for examining the application is approximately 1 month from the date of the receipt.

Those who wish to remain connected to the grid in order to get a credit on their surplus electricity production, must submit a connection request to the relevant grid operator. This process is usually done between the NURC (the regulators) and LUCELEC. The NURC will send over the application for technical inspection and then LUCELEC returns the application back to the NURC with its approval/disapproval. Once the NURC receives confirmation from LUCELEC The application then has to be approved by the board. Once the NURC board has approved of the application, a

permission letter will be granted to authorize the installation of the solar system. Once installed an application is prepared and sent to the electrical department at the Ministry of Infrastructure. Then, an approval certificate from the electrical department along with the LUCELEC application for a net metering agreement.

Once approved, LUCELEC will come to the site to inspect the system and program it with the installers assistance to meet their grid frequencies and safety standards. After the system is approved by LUCELEC, they will issue an approval document and authorize for the installation of a directional meter. This meter tracks the excess power produced by the solar system which is sent back to the grid. This gives citizen/business a credit which can be applied to their monthly electric bill. Once all of this is complete, commissioning can then be carried out.

**Guyana's Environmental and Social Assessment and Permitting:** The Environmental Protection Act, No. 11 of 1996, Part IV requires that developers of proposed projects which are deemed by the Agency to have potentially significant impacts on the environment or listed in the Fourth Schedule must apply to the Agency for Environmental Authorisation (EPA-Environmental Guidance for the Development, Implementation and Operations of Projects, 2006). The Environmental Protection Agency's (EPA's) Permitting and Compliance department in Guyana issues environmental authorization for developmental activities and ensures compliance with the permit conditions. The technical program areas also work to develop standards and guidelines for operators within the various economic sectors.

**Guyana's Net Metering Program:** Guyana allows private citizens and businesses to install PV systems and tie-in to the grid. Interim Technical Guidelines have been established by Guyana Power and Light Inc. (GPL) for these installations. Customers who wish to establish an interconnection agreement with GPL must meet the following technical requirements:

- PV installations must be compliant with the National Electric Code 2014 (NEC), particularly but not limited to Article 690 and Article 705. All interconnection equipment (inverters, charge controllers, etc.) must conform with the IEEE 1547 Standard and be listed under the UL 1741 Standard. (See Interim Interconnection Requirements).
- Customers are allowed to install systems under 100kWac (Inverter Rating) regardless of their consumption, subject to GPL's requirements for interconnection. However, systems 100kWac and greater will be subject to approval based on the customer's maximum demand.
- All installations 100kWac and over will be subject to an interconnection assessment in accordance with GPL's Grid Code and Interim Interconnection Requirements before approval is given. This is to ensure that the interconnection of these larger installations does not have detrimental technical impacts on the distribution networks in the surrounding area.
- All customers must submit an electrical one-line diagram of the installation, the specifications of the inverter(s) used in the installation, and a Certification of Inspection (COI) from the Government Electrical Inspectorate (GEI) that certifies the installation as safe. This COI has to be applied for by the licensed Electrician/Contractor completing the installation.
- In addition, GPL conducts an interconnection inspection in order to ensure that prospective customer can be safely integrated with the company's distribution network. This is to avoid any possible technical, safety and/or security issues that can result from non-compliant connections to the distribution network.

Customers interested in interconnecting these installations must submit a request for interconnection of electricity from solar installations with GPL's network to the Divisional Director – Customer Services. Requests should clearly identify the account that the grid-tied system would be installed on and the electrical one-line diagram and specifications of the inverter(s) should be included if available.

The customer/prosumer with a grid-tied installation sign a Standard Offer Contract (SOC) with GPL. GPL compensates the Prosumer for excess energy exported to the National Grid. i.e. (i) the electric service provided by the Company (energy delivered to the Prosumer) and (ii) excess generation exported (energy received by the Company) by the Prosumer. If during the billing period, the received energy charge is greater than the delivered energy charge, the received energy credit is applied to the 'Energy Credits Bank' for application to future bills with net Energy. If the delivered energy charge is greater than the received energy charge, then available credits can be withdrawn from the 'Energy Credits' Bank to reduce or liquidate the net Energy Charge. Subject to the deduction of monies owed to the Company, any unused credit remaining at the end of a twelve-month period will be paid to the Prosumer at a rate of 90% of the tariff at the time.

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

The recent population census conducted in Grenada in 2021 revealed that the island has 109,021 people. The Census also showed that the highest concentration of the population is concentrated in the Saint George's area (38.6 %). The parish where the capital is located is the main commercial and industrial centre. The parish with the second highest concentration of the population is that of Saint Andrews with 22.7%. Over 60 % of the entire population reside in Saint Georges and Saint Andrews. The Saint Andrews parish is considered the main breadbasket of the island, having the highest agricultural production output.

Grenada's economy over the years has been transformed into a predominantly service sector economy with the tourism sector being the main contributor to Gross Domestic product (GDP). In recent times the Government has been placing enormous emphasis on the development of that sector by promoting the development of high-end quality resorts, investing more in promotional activities, and seeking to enhance the country as pure and pristine. Grenada has a lot of attractions to offer, favourable weather conditions, excellent beaches, lakes, waterfalls, friendly and hospitable people, low crime rate, good infrastructure, clean and pristine environment, and proximity to the USA market have placed Grenada in an advantageous position to capitalize on the tourism market.

### 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 Soufrière 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 191<sup>st</sup> 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.

## Guyana Environmental and Social Context

Guyana is an English-speaking Caribbean country located on the South American mainland and the Atlantic coast and shares borders with Suriname, Brazil, and Venezuela. Guyana is endowed with extensive grasslands, tropical rainforests, deposits of gold, bauxite, and diamonds, abundant water resources, and newly discovered oil and gas reserves off its Atlantic coast. Resource-based development has created a limited number of jobs. Over 80 percent of Guyana's land mass is covered by tropical rainforest and mountains, and the population is concentrated along the coastal plain. Poverty rates are highest in the sparsely populated interior, where communities have limited access to economic opportunities, healthcare, and public services. Guyana is an ethnically and religiously diverse society, encompassing Indo-Guyanese, Afro-Guyanese, Mixed-Guyanese, indigenous Amerindian, Portuguese, Europeans and Chinese.

Guyana's territory (land area) is 214,969 Sq. Km with a population of 744,962 (2018). In the 2012 census Guyana's population density was 3.5 persons per Sq. Km but 9.6 persons per sq. km in coastland regions (where 89% of the total population lives within the capital city Georgetown having a density of 140 persons per sq. km) and 4 persons per sq. km in the hinterland (hinterland possess two-thirds of total land area where only 11% of the total population lives). Despite these densities, in 2012, 26% of Guyana's household population (191,810) lived in the urban areas (the average for LAC is 80%), with 62% clustered in Georgetown while 74% (535,193) lived in rural areas. Urban population growth was projected at less than 1 percent in 2018 (0.7%).

## Potential Environmental and Social Risks

The Project will have overall positive environmental and social impacts as it will reduce energy consumption while increasing electricity supply resilience of public buildings and thus of essential public services. Identified risks and impacts summarized in this section are primarily related to activities under Component 1 of the Project.

**Environmental risks and impacts** are primarily related to waste management and construction practices. Specifically, these include generation and disposal of hazardous waste such asbestos-containing materials, lead-based paints, refrigerants, old appliances, batteries, etc.; non-hazardous materials including construction waste, LED bulbs, oil, and grease; and noise and dust management (if identified at the sites). Retrofitting of roofs for PV arrays may require use of pesticides, mildewcides, or other chemicals and replacement of roofs would include associated worker health and safety risks. Utility-scale battery storage could involve construction of new structures within

existing government premises such as car parking areas and works to ensure adequate drainage and access control. Risks related to construction will be short-term, localized, and reversible and could be addressed through standard mitigation measures and good international industry practice delineated in the **WB Group General Environmental, Health and Safety (EHS) Guidelines**.

**Social risks and impacts** are associated with labor and working conditions, occupational health, and safety (OHS), and community health and safety. Given the size of the installation and maintenance service contracts expected under the Project, contracted firms are expected to hire local labor under the project, and thus the risks related to labor influx are expected to be limited. As most subprojects are expected to be implemented within the existing footprints of public buildings, the Project is not expected to have any land acquisition impacts. However, a Resettlement Framework (RF) has been prepared as a precautionary measure in case land acquisition and/or involuntary physical/economic displacement is required in one or more subproject sites.

Table 5 details preliminary environmental and social risks/impacts and mitigation measures identified during the project preparation stage. This section is based on input from the stakeholder engagement activities during project preparation and will be updated during project implementation.

**Table 5 E&S Risks**

Key E&S Aspects	Risks
Pollution	<ul style="list-style-type: none"> <li>- Air pollution from improper dust management at the site</li> <li>- Noise pollution</li> <li>- Soil and water pollution caused by runoff or petroleum compounds from leaking equipment or stored materials</li> <li>- Contamination of groundwater and surface water by discharged effluent</li> </ul>
Waste	<ul style="list-style-type: none"> <li>- Improper sanitary facilities during construction</li> <li>- Inadequate solid waste management</li> <li>- Hazardous waste management</li> </ul>
Community Health and Safety	<ul style="list-style-type: none"> <li>- 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</li> <li>- Public Health and Safety concerns, through reduced air quality and safety of passage near the works for pedestrians and vehicles</li> <li>- Risk of Social Conflict with the Contractor's personnel and the wider public.</li> <li>- Workplace discrimination</li> <li>- Lack of stakeholder consultations and public disclosures</li> </ul>
Occupational Health and Safety	<ul style="list-style-type: none"> <li>- Slippage and falling from working at heights</li> <li>- Electrocution</li> <li>- Working with Hazardous Substances</li> </ul>
Stakeholder Engagement	<ul style="list-style-type: none"> <li>- Potential exclusion of some groups particularly vulnerable groups from project benefits and activities, particularly if there is no adequate socialization of project activities</li> </ul>

## 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
<b>a. Subproject conceptualization/pre-feasibility:</b> Subproject identification	Screening	<ul style="list-style-type: none"> <li>- During subproject identification, ensure subproject eligibility by referring to the Exclusion List <a href="#">in Annex 2</a>.</li> <li>- For all activities not excluded, use the Screening Form in <a href="#">Annex 3</a> to identify and assess potential environmental and social impacts, and identify the appropriate risk level of each activity</li> </ul>
<b>b. Feasibility and Design:</b> Planning for subproject activities, including human and budgetary resources and monitoring measures.	Assessment	<ul style="list-style-type: none"> <li>- Based on the level of risk, adopt environmental and social procedures and/or prepare relevant plans.</li> <li>- For activities requiring Environmental and Social Management Plans (ESMPs), submit the first 5 ESMPs for prior review and no objection by the WB.</li> <li>- Ensure that the contents of the ESMPs are shared with relevant stakeholders in an accessible manner and consultations are held with the affected communities.</li> </ul>
<b>c. Construction and Operation:</b> Implementation support and continuous monitoring of activities.	Implementation of E&S measures	<ul style="list-style-type: none"> <li>- Incorporate relevant environmental and social mitigation measures into contractor bidding documents</li> <li>- Ensure implementation of procedures and plans E&amp;S measures through site visits, regular reporting from the field and other planned monitoring.</li> <li>- Track grievances/beneficiary feedback.</li> <li>- Continue awareness raising and training for relevant staff, volunteers, contractors, communities.</li> </ul>
<b>d. Review &amp; Evaluation:</b> Qualitative, quantitative and/or participatory data collection on a sample basis.	Completion	<ul style="list-style-type: none"> <li>- Assess whether mitigation measures have been effectively implemented.</li> <li>- Ensure that physical sites are properly restored.</li> </ul>

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

As a first step, the Environmental Specialist, and the Social Specialist (E&S Specialists)<sup>2</sup> 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 2](#)). As a second step, the E&S Specialists/Social and Environmental Officer will use the Environmental and Social Screening Form ([Annex 3](#)) 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/Social and Environmental Officer 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

<sup>2</sup> In Guyana, one Social and Environmental Officer (in lieu of separate E&S Specialists) within the PIU will be charged with implementing these activities outlined in the Project's SEP, ESMF and LMP.

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 of 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/Social and Environmental Officer will determine which E&S documents are to be prepared, proportionate to the scale of the 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 8.
- Sub-projects with an overall risk rating of “substantial” will be excluded.
- 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
<b>ESS1:</b> Assessment and Management of Environmental and Social Risks and Impacts	Apply ESCOPs capturing appropriate measures	Implement ESMP*	N/A (site excluded)	N/A (site excluded)
<b>ESS2:</b> 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)	N/A (site excluded)
<b>ESS3:</b> Resource Efficiency and Pollution Prevention and Management	Apply ESCOPs capturing appropriate measures	Implement ESMP which includes detailed waste management procedures	N/A (site excluded)	N/A (site excluded)
<b>ESS4:</b> 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)	N/A (site excluded)
<b>ESS5:</b> Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	ESS5 is not expected to be relevant since subprojects are expected to be implemented within the existing footprints of public buildings. If land acquisition in one or more subproject sites appears to be likely, a Resettlement Policy Framework (RPF) will be prepared.		N/A (site excluded)	N/A (site excluded)

ESS	Risk rating			
	Low	Moderate	Substantial	High
<b>ESS8: Cultural Heritage</b>	Apply Chance Find Procedures as part of ECOP	Apply Chance Find Procedures as part of the ESMP and a Cultural Heritage Plan (as needed)	N/A (site excluded)	N/A (site excluded)
<b>ESS10: Stakeholder Engagement and Information Disclosure</b>	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)	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 4) maybe adopted or Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs) (Annex 5) 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 10 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 Guyana will be submitted to the WB for prior review and no objection.

**Table 9 Environmental and Social Risks and Mitigation Measures**

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	Minimize	Mitigate	Compensate/Offset
<b>Risks related to planning, supervision, assessments, and unintended impacts (ESS1)</b>	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 <a href="#">Annex 3</a> 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.	
<b>Occupational health and safety risks (ESS2)</b>	<p>Works will require work at heights for the installation of rooftop PV systems. Weak and deteriorating roofing, instable scaffolding, and inadequate harnessing/safety gear expose workers to significant risk of falls.</p> <p>Workers are also exposed to the risk of electrocution under the works considered under the Project.</p> <p>Other risks include exposure to physical hazards from using heavy equipment and increasing levels of dust and noise.</p>	<p>Support investments only in buildings that have been approved via the investment grade audit to avoid potential structural integrity issues in the buildings.</p> <p>All contractors must develop an OHS plan per the ESMP requirements.</p> <p>Do not allow contractors' work commencement without an approved OHS plan.</p> <p>Educate and train the workers on the OHS standards regularly.</p> <p>Make OHS Specialist requirements mandatory in contractors' bidding documents and an OHS team.</p> <p>Appropriate signposting of construction sites should inform workers of rules and regulations to be followed.</p>	<p>Identify all hazards and include them in the OHS plan</p> <p>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</p> <p>Monitor and inspect the work area regularly</p> <p>Tidy wiring for easy maintenance and reduces the risk of accidents.</p> <p>Personnel will be required to wear appropriate PPE at all times.</p> <p>Apply LMP (<a href="#">Annex 6</a>)</p>	<p>Conduct audits by independent reviewers of the sites, identify unsafe conditions and acts and engage leadership to ensure compliance.</p> <p>Raise contractor and building manager awareness on electrical hazards and health and safety concerns, as well as proper maintenance of solar panels</p>	<p>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.</p>

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	Minimize	Mitigate	Compensate/Offset
		Scaffolding and harnesses will be utilized for working at heights.			
<b>Generation, management, and disposal of hazardous and non-hazardous waste (ESS3)</b>	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 management of the equipment, appliances, and batteries.	N/A
<b>Construction-Related Dust Generation, Vibration,</b>	Construction-related risks are expected to be short-term, localized, and reversible.	Restrict noise during peak use times of sub-project site	Minimize transporting dust, noise, and odor-generating material through residential areas.	Apply mitigation measures and good international industry practice as delineated in <b>WB Group</b>	N/A

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	Minimize	Mitigate	Compensate/Offset
<b>Noise, Standing Water and Odor (ESS2, ESS3, ESS4)</b>	<p>While works on most sub-project sites are expected to take place during off-peak hours, work on sites such as the hospitals will have to be accommodated through other measures.</p> <p>Air pollution is expected to be minimal.</p>	<p>Avoid transport without putting proper measures in place.</p> <p>Avoid earthen roads for transporting construction materials</p> <p>Avoid storing construction materials near water bodies and community areas.</p> <p>Place the dust generation equipment and other powered equipment away from sensitive receptors to avoid complaints.</p>	<p>Mechanical equipment to be enclosed</p> <p>Maintain a buffer zone between the project site and residential areas to lessen the impact of noise.</p> <p>Stocking of construction materials and machinery must be within a limited area.</p> <p>Stockpiles of construction materials must be covered to protect them from wind and weathering action.</p> <p>Limiting activities for producing fugitive dust particles, e.g., handling of the construction materials etc.</p> <p>Transport vehicles must not be overloaded.</p> <p>Avoid queueing vehicles adjacent to the site, particularly near sensitive receptors, including housing.</p> <p>Switch off / throttle down all site vehicles, water vessels, generators and machinery when not in use.</p>	<p><b>General Environmental, Health and Safety (EHS) Guidelines</b></p> <p>Create a construction management plan that determines the dust, noise, and odour-generating areas and activities. Have mitigating measures for any such activities.</p> <p>Wet dry areas on a regular basis</p> <p>Workers to wear PPE such as dust masks</p> <p>Repair and maintain machineries for safe and quiet operation.</p> <p>Vehicle speed restrictions (must be enforced to control dust generation).</p> <p>Construction materials must be covered to protect from wind</p> <p>Regular air monitoring must be carried out near the sensitive receptors to ensure ambient air quality remains within limits defined by national standards</p> <p>Create a Traffic Management Plan to reduce vehicular and pedestrian congestion.</p>	

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	Minimize	Mitigate	Compensate/Offset
<b>Asset Damage and Corrosion (ESS3)</b>	Climate-related impacts on infrastructure: damage and loss of hardware in storms and hurricanes and increased air temperatures leading to increased asset corrosion.		<p>Additional measures to secure PV panels or to have them as stand-alone structures that can be readily dismantled and removed before storms/hurricanes and remounted afterwards.</p> <p>The cutting of trees/branches near to site with potential to break off and cause damage to installation during high winds.</p>	<p>Select sites based on certain criteria/based on exclusion criteria</p> <p>Re-plant to replace cut trees, if applicable</p> <p>Insurance to replace damaged assets</p>	
<b>Mold affecting overall air quality (ESS4)</b>	Some of the proposed sub-project sites have issues with mold growth in air conditioning systems. Remediation measures in the past have not been successful and some parts of the sites are deemed unusable.	Exclude the building as a possible sub-project site	Assess past mold remediation efforts and implement new measures as needed.	Assess past mold remediation efforts and implement new measures as needed.	
<b>Pest Control (ESS2, ESS3, ESS4)</b>	<p>Many of the PV systems will be installed on rooftops. Prior to installation, inspections may find that the sites have problems with bat, termite, rodent infestations.</p> <p>Improper pest control measures using chemicals/pesticides could lead to allergic and other harmful reactions in site users, such as children and health compromised individuals.</p>	Exclude the site if requires extensive pest control		<p>Develop a Pest Control Plan</p> <p>Contract only licensed and certified pest control firms</p>	
<b>Disturbance or damage to cultural heritage sites (ESS8)</b>	In both Grenada and St Lucia, some of the proposed sub-project sites are designated as cultural heritage sites. Works on these sites are expected to be short-term, localized, and reversible.	Assess design alternatives to avoid impacts under ESS8.	<p>Assess different design alternatives to minimize impacts under ESS8.</p> <p>All facades worked on will be returned to their original form.</p> <p>Include Chance Find Procedures in all contracts</p>	<p>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.</p>	N/A

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	Minimize	Mitigate	Compensate/Offset
			relating to construction or civil works. ( <a href="#">Annex 11</a> )	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. ( <a href="#">Annex 11</a> )	
<b>Exclusion of disadvantaged and vulnerable persons/communities<sup>3</sup> (ESS10)</b>	Selected sub-project sites may affect disadvantaged and vulnerable 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.	Follow the relevant measures included in the project design and the Stakeholder Engagement Plan (SEP) prepared for the project.	In identifying subproject activities and 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	Proactively identify, consult with, and reach 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.	N/A
<b>Forced Labour (ESS2)</b>	The procurement of solar panels and solar components involves a risk of forced labor in the global supply chain.			The OECS Commission (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	

<sup>3</sup> In the SEP and through stakeholder consultations, the following disadvantaged and vulnerable communities were identified: 1) Persons with disabilities 2) women in the energy sector and building trades, 3) Primary school age children and in the case of Grenada, 4) Prison Inmates, who currently participate in a vocational training program, could also be trained on installing and maintaining PV technologies.

Risks/Impacts (Relevant ESS)	Rationale	Measures			
		Avoid	Minimize	Mitigate	Compensate/Offset
				(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, the Project will include enhanced language on forced labor in the procurement contracts.	
<b>Data Privacy Breaches</b>  (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. E&S Implementation of E&S Measures*

In Grenada and Saint Lucia, the E&S Specialists, with the support of Community Liaison Officers (CLOs) and sub-project focal points will monitor the implementation of E&S risk management mitigation plans as part of monthly project monitoring visits while works are taking place at the sub-project site.

In Guyana, one Social and Environmental Officer (in lieu of E&S Specialists) within the PIU will be charged with implementing the activities outlined in the Project's SEP, ESMF and LMP. Guyana's PIU will count on the support of additional PIU staff (such as staff engineers, a monitoring and evaluation assistant and a public communications officer) and sub-project focal points in monitoring the implementation of E&S risk management mitigation.

**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 bi-annual basis. (Annex 13 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 12 which must 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/Social and Environmental Officer 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 and focal points as well as the E&S Specialists/Social and Environmental Officer 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 9](#) 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/Social and Environmental Officer 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/Social and Environmental Officer 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/Social and Environmental Officer 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/Social and Environmental Officer 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 OECS member 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. (See Figure 1 below)

The Project will be implemented at the national and regional levels, under a regional coordination framework. The implementation arrangements are designed to: (i) ensure strong ownership of the PDO and the implementation of components by the participating countries, (ii) facilitate synergy and economies of scale, and (iii) strengthen coordination among Caribbean countries at the regional level. At the national level, the line ministry and agency responsible for the energy sector in each of the participating countries will be responsible for the Project's execution, in close collaboration with the Ministry of Finance (MOF) and other ministries associated with project sub-components. A regional steering committee (RSC) with senior official representatives appointed by the participating countries, as well as by OECSC and CCREEE, will be created to provide strategic oversight of Project implementation. (See Figure 1 below)

**OECS Commission.** Through expanded Pooled Procurement services (PPS) for the energy sector, a Regional PIU with project officers will be created under its Environmental Sustainability Division. The Regional PIU will provide the PPS to the participating countries for their investment in EE and DPVs and implement the regional capacity building activities financed under Component 3, by providing comprehensive procurement training and resources, *inter alia*, on effectively utilizing framework agreements for building retrofits and contract management.

**CCREEE.** The CCREEE will be strengthened with a technical team, consisting of CCREEE staff and external consultants,

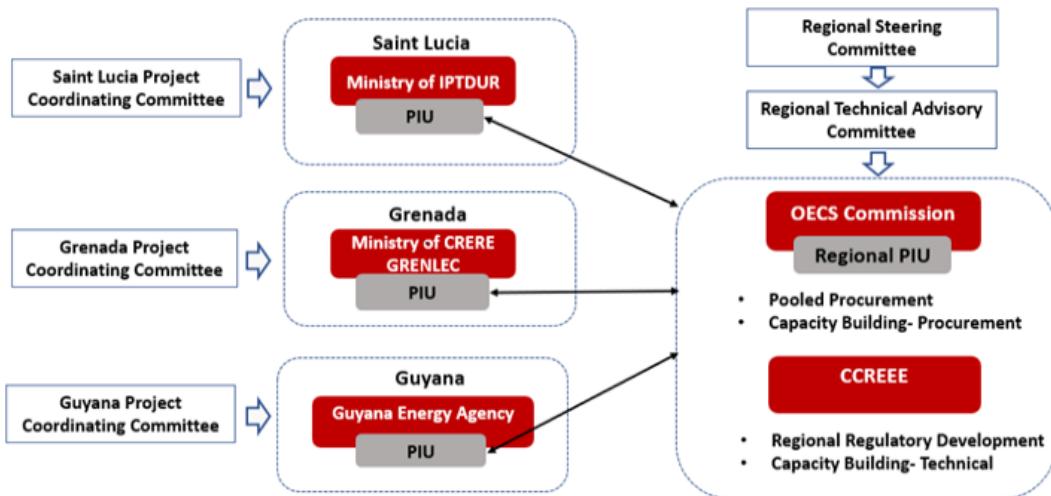
to implement activities for the development of the regional regulatory framework and related regional capacity-building under Subcomponent 2.4. The CCREEE will also provide technical inputs, as necessary, to the pooled procurement process led by the OECSC, through its members appointed to the regional RSC and TAC.

**Grenada.** A new PIU will be created for all activities under the Project. Accounting staff from the Project Accounting Unit (PAU) in the Accounting General Department (AGD) and procurement staff from Project Coordination Unit within the MOF will be assigned to the CEGEB Project. The PIU will be established under a National Coordinating Committee (NCC), chaired by the Grenada Ministry of Climate Resilience, the Environment and Renewable Energy (MCRERE). MCRERE will manage the public buildings retrofits and GRENLEC the MBIA VRE Integration subproject.

**Saint Lucia.** The existing PIU for the Renewable Energy Sector Development Project (P161316) under Saint Lucia's Ministry of Infrastructure, Ports, Transport, Physical Development and Urban Renewal (MIPTDUR) will be expanded and strengthened for the implementation of Saint Lucia's activities under the Project. The NCC for Saint Lucia will include representatives of MOF, other relevant ministries and entities, the NURC, etc. The NCC will coordinate and oversee the project activities at country level.

**Guyana.** A new PIU for the Project's activities in Guyana will be created under the GEA, with professional staffs from GEA and additional consultants to be recruited, as may be needed. The NCC for Guyana will be established for overseeing the Project with representatives from the MOF, other relevant ministries, public entities, and Guyana's PUC.

Figure 1 Institutional Arrangements



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 such as Screening Forms and ESMPs as relevant.

Each PIU will also employ Environmental Specialist and Social Specialists (a Social and Environmental Officer in the case of Guyana). 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 policies 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 bi-monthly progress reports to the WB capturing the status of subproject activities~~
- Send bi-annual 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/Social and Environmental Officer 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.

In Grenada and Saint Lucia, 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

In Guyana, GEA's energy engineers will provide technical support to the Project including through conducting energy audits, supporting data collection and analysis, procurement of goods and services related to the project, project monitoring, site visits and evaluations, stakeholder consultations and preparation and review of reports and other related documents. A monitoring and evaluation assistant will be responsible for measuring, monitoring, and evaluating Project activities to ensure consistency in objectives and using output indicators to deliver timely and relevant reports referenced in Project documents.

In all Project countries, sub-project focal points will provide daily on-site supervision, help disseminate project information and gather grievances and feedback from stakeholders. These focal points, who will most likely be

building managers and engineers, will be trained in maintenance of the newly installed equipment and as well as related fire and life safety issues.

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 in order 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 9 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	<p>ESMF/LMP and approach:</p> <ul style="list-style-type: none"> <li>- Identification and assessment of E&amp;S risks</li> <li>- Selection and application of relevant E&amp;S risk management measures/instruments, especially preparation and implementation of the ESMPs</li> <li>- Monitoring of ESMP/C-ESMP implementation</li> <li>- Application of SEP and the grievance/beneficiary feedback mechanism</li> <li>- E&amp;S monitoring and reporting</li> <li>- Incident and accident reporting</li> <li>- Stakeholder engagement and grievance management</li> </ul>
Project site level	PIU E&S Specialists	PIU staff Supervision Consultant	<ul style="list-style-type: none"> <li>- E&amp;S risks and instruments developed under the Project</li> <li>- Incorporation of the E&amp;S mitigation measures into the bidding documents</li> <li>- Monitoring of ECOPs/MSIP/C-ESMP implementation</li> <li>- Application of SEP and the grievance/beneficiary feedback mechanism</li> <li>- E&amp;S reporting</li> <li>- Incident and accident reporting</li> <li>- Stakeholder engagement</li> </ul>

Sub-project site level	Supervision Consultants/ PIU E&S Specialists	Contractors	<ul style="list-style-type: none"> <li>- Implementation of the ECOPs/MSIP/C-ESMP</li> <li>- Application of LMP, including Code of Conduct, incident reporting, workers' grievance management, among other topics</li> <li>- OHS measures and use of PPE</li> <li>- Application of SEP and the grievance/beneficiary feedback mechanism</li> <li>- Fire and life safety trainings</li> </ul>
Sub-project site level/Community Level	CLOs	Community members	<ul style="list-style-type: none"> <li>- Community health and safety issues</li> <li>- Grievance management</li> </ul>

## 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 (1 trip/year, ferry round trip, accommodations for 3 days)	500
Paraphernalia, training materials, brochures, and other promotional materials**	12,000
Miscellaneous expenses	5,000
<b>TOTAL</b>	<b>30,700</b>
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
<b>TOTAL</b>	<b>30,000</b>
GUYANA	
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
<b>TOTAL</b>	<b>30,000</b>

\*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 Guyana have been prepared for the Project. 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.

**Initial consultations in Grenada** included meetings with:

- National Consultation with diverse stakeholders in the energy, environment, and other related sectors (April 13th, 2023)
- Cultural Heritage Stakeholders Meeting, (April 14, 2023)
- Grenada Green Group representatives (May 8, 2023)

Representatives from the National Climate Change Committee, Representatives from the Sustainable Development Council and staff of the Ministry for Implementation also submitted written comments on this ESMF, LMP and the SEP.

**Initial consultations in Saint Lucia** included meetings with:

- National Consultation with diverse stakeholders in the energy, environment, and other related sectors, in-person and virtual (April 6th, 2023)
- Fire service, Deputy Fire Chief, Assistant Divisional Officers (May 11, 2023)
- Youth Emergency Action Committees, two administrative personnel representing youth members. There are over 120 active members of these committees who are responsible for project implementation, job placements and capacity building of youth members. (May 11, 2023)
- National Insurance Property development and management (NIPRO), CEO and two subordinate Officers (May 16, 2023)
- Carmen Renee Memorial Primary School, approximately 400 students and 10 teachers at a special assembly (May 18, 2023)

**Initial consultations in Guyana** were held in December 2023 and included a meeting with:

- Representatives from the first 13 selected buildings
- Regional Education Officers for schools under their purview (Region 3,4 and Georgetown)
- Regional Health Officers for Health facilities under their purview (Region 3,4,5,6)
- The Ministry of Health Drugs Bond Buildings located in Kingston, Georgetown stakeholder was absent for the meeting, however the regional health officer (region 4) with responsibility for the building under its purview was present.

Subsequently, a second round of consultations was held in January 2025 with representatives from the additional 17 selected buildings:

- Representatives from 15 of the 17 buildings attended the meeting. The Call and Business Centre for Persons with Disabilities and St. Winefride Secondary School were unable to participate.
- A summary report and presentation were provided to the principal of St. Winefride Secondary School, who confirmed that she had no further questions or comments regarding the project and its activities.
- Representatives from the Call and Business Centre for Persons with Disabilities did not attend any meetings. However, prior engagement occurred between the Centre's management and the GEA engineer during the energy audit walkthrough for data collection purposes.

Once initial consultations were completed, key feedback on the disclosed ESMF was recorded and considered by the PIUs. The SEPs that have been prepared for this project have been disclosed in draft form on the following websites:

- Grenada: [Government of Grenada General Website](#), first draft disclosed on April 3, 2023.
- Saint Lucia: [Government of Saint Lucia Website](#) on April 13, 2023.
- Guyana: [Guyana Energy Agency's Website](#) on December 8, 2023.

## ANNEX 1: PROPOSED SUB-PROJECT SITES

### Grenada Proposed Sub-Project Sites

Sub-Project Site Type	Sub-Project Site Name
<b>Government Administrative and Other Buildings</b>	1. Ministerial Complex 2. Ministry of Education 3. Ministry of Finance 4. Courthouse
<b>Educational Institutions</b> <i>(Primary and Secondary Schools, Community Colleges)</i>	5. Grenada Boys Secondary School (SS) 6. Boca SS 7. Greenville SS 8. Saint Patrick Roman Catholic College 9. MacDonald College 10. TAMCC, Saint Georges 11. TAMCC, Sauteurs
<b>Healthcare Institutions</b> <i>(Hospital, medical clinics)</i>	12. General Hospital 13. Medical Station, Snug Corner 14. Medical Station, Sauteurs
<b>Fish Markets</b>	15. Melville Street 16. Greenville 17. Gouyave
<b>Others</b>	18. Airport 19. National Stadium 20. His Majesty's Prison 21. Police Training School 22. National Marketing and Importing Board

### Saint Lucia Proposed Sub-Project Sites

Sub-Project Site Type	Sub-Project Site Name
<b>Government Administrative and Other Buildings</b>	1. Heraldine Rock Bldg. 2. Sir Stanislaus James Bldg. 3. NIC (Waterfront) Francis Compton 4. Fisheries Building Complex 5. Financial Administrative Center 6. Forensics Lab 7. Police Training School 8. Vieux Fort Marine Police 9. Tissue Culture Unit -Union- Ministry of Agriculture
<b>Educational Institutions</b> <i>(Primary and Secondary Schools, Community College)</i>	10. Carmen Rene Memorial School 11. Gros Islet Primary School 12. Saint Lucia Sports Academy 13. Corinth Secondary School 14. Castries Comprehensive Secondary School 15. Leon Hess Secondary School 16. Entrepot Secondary School 17. Soufriere Comprehensive 18. Bocage Secondary School 19. Sir Ira Simmons Secondary School 20. Au Leon Combined School 21. Dennery Schools Complex-Clendon Mason 22. Anse Ger Secondary School 23. Piaye Combined School 24. Roblot Combined School 25. Sir Arthur Lewis Community College
<b>Healthcare Institutions</b>	26. Victoria Hospital 27. Soufriere Hospital 28. Owen King EU Hospital
<b>Sports Facilities</b>	29. Daren Sammy Cricket Grounds 30. Philip Marcellin Grounds 31. National Tennis Center 32. Mindoo Phillip Park
<b>Fire Stations</b>	33. Gros Islet Fire Station 34. Dennery Fire Station 35. Vieux Fort Fire Station

### Guyana Proposed Sub-Project Sites

Sub-Project Site Type	Sub-Project Site Name	Locations	Regions
Government Administrative Buildings	1. Regional Democratic Council	Vreed – en – hoop	Region 3
	2. Guyana Lands and Surveys Commission	Crane, WCD	
	3. Guyana Revenue Authority	Parika	
	4. EPA Office	Whim, EBC	Region 6
	5. Guyana Elections Commission, Head Office	Georgetown	
	6. Buxton Post Office	Buxton, ECD	Region 4
	7. Guyana Rice Development Board	La Bonne Intention	
Educational Institutions	8. Good Hope Secondary School	East Coast Demerara	
	9. East Ruimveldt Secondary School	East Ruimveldt, Georgetown	
	10. Sophia Training Centre	Sophia, ECD	
	11. Government Technical Institute	Thomas Lands, Georgetown	
	12. St. Winefride's Secondary School	East Ruimveldt, Georgetown	
	13. West Ruimveldt Primary School	Georgetown	
	14. Yarrowkabra Secondary School	Linden/ Soesdyke Highway	
	15. Zeeburg Secondary School	Zeeburg	Region 3
	16. Lenora Technical & Vocational Training Centre	Leonora, WCD	
	17. De Willem Secondary School	De Willem, WCD	
	18. Mahaicony Technical and Vocational Training Center	Plantation Park, Mahaicony	Region 5
	19. New Amsterdam Technical Institute	New Amsterdam, East Berbice	
	20. Vryman's Erven Secondary School	127 Republic Road, New Amsterdam	Region 6
Healthcare Institutions	21. Parika Health Center	Parika	Region 3
	22. Cotton Tree Health Centre	Cotton Tree, WCB	
	23. Rosignol Health Center	Rosignol	
	24. Experiment Health Centre	Experiment, WCB	Region 5
	25. National Ophthalmology Hospital	Port Mourant	
	26. Port Mourant District Hospital	Port Mourant	
	27. Call and Business Centre for Persons with Disabilities	Palmyra Village, EBC	
	28. Ministry of Health Central Supplies Unit	Water Street, Georgetown	Region 4
	29. Ministry of Health Materials Management Unit	Diamond, East Bank Demerara	
	30. Ministry of Human Services & Social Security - Children & Family Care Centre, Plum Park	Diamond, East Bank Demerara Georgetown	

## ANNEX 2: 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 cause 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 3: ENVIRONMENTAL AND SOCIAL SCREENING FORM

*This form is to be filled out by the E&S Specialists/Social and Environmental Officer 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.*

### 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	
<b>ESS1</b>			
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 small-scale infrastructure, such as windows, doors, ceilings, or shelters?			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.
<b>ESS2</b>			
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. <sup>4</sup>			If "Yes": Provide details to determine the level of risk.
<b>ESS3</b>			

<sup>4</sup> "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.

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.
<b>ESS4</b>			
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.
<b>ESS5</b>			
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.
<b>ESS6</b>			
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.
<b>ESS8</b>			
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.

## 1. Conclusion

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

## ANNEX 4: 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	<ul style="list-style-type: none"> <li>a) Provide adequate drainage in the building's immediate surroundings to avoid standing water, insect related diseases (malaria, etc.) and unsanitary conditions. (Implementation phase)</li> <li>b) Include sanitary facilities such as toilets and basins for hand-washing. (Implementation phase)</li> <li>c) Restrict use of asbestos cement tiles as roofing. (Implementation phase)</li> <li>d) Tiled floors are preferred for easier cleaning and more hygienic. (Planning and implementation phases)</li> </ul>
2. Noise during construction	<ul style="list-style-type: none"> <li>a) Plan activities in consultation with communities so that noisiest activities are undertaken during periods that will result in least disturbance.</li> <li>b) Use when needed and feasible noise-control methods such as fences, barriers, or deflectors (such as muffling devices for combustion engines).</li> <li>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.</li> <li>d) Repair and maintain machineries for safe and quiet operation.</li> </ul>
3. Solar power supply	<ul style="list-style-type: none"> <li>a) Tidy wiring for easy maintenance and reduces the risk of accidents. (Implementation phase)</li> <li>b) Need to raise community awareness on electrical hazards and health and safety concerns, as well as proper maintenance of solar panels (Implementation and post-implementation phases)</li> <li>c) Need to raise community awareness on proper disposal of solar panels, specifically avoiding disposal of panels near water bodies (Post-implementation phase)</li> <li>d) Need to raise community awareness on energy conservation (Post-implementation phase)</li> </ul>
4. Soil erosion	<p>Protect slopes from erosion and landslides by the following measures (Implementation phase):</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>c) For steep slopes, a stepped embankment (terracing) is needed for greater stability.</li> <li>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.</li> <li>e) Rocks (riprap) can be used in addition to protect the slope.</li> </ul>
5. Soil Pollution	<ul style="list-style-type: none"> <li>a) Storage for hazardous materials should be above ground and isolated.</li> <li>b) Establishing an appropriate disposal area for hazardous materials and waste which prevents hazardous material from leaching into the soil and surface water.</li> </ul>
6. Air quality	<ul style="list-style-type: none"> <li>a) Minimize dust from exposed work sites by applying water on the ground regularly during dry season.</li> <li>b) Reduce dust generation through application of water where practical.</li> <li>c) Avoid burn site clearance debris (trees, undergrowth) or construction waste materials.</li> </ul>

	<p>d) Keep stockpile of aggregate materials covered to avoid suspension or dispersal of fine soil particles during windy days or disturbance from stray animals.</p> <p>e) Reduce the operation hours of generators /machines /equipment /vehicles as much as possible.</p> <p>f) Control vehicle speed when driving through community areas is unavoidable so that dust dispersion from vehicle transport is minimized.</p> <p>g) Limit idling of vehicles, machineries equipment.</p>
7. Water quality and availability	<p>a) Activities should not affect the availability of water for drinking and hygienic purposes.</p> <p>b) No soiled materials, solid wastes, toxic or hazardous materials should be poured or thrown into water bodies for dilution or disposal.</p> <p>c) Avoid the use of wastewater pools particularly without impermeable liners.</p> <p>d) Provision of toilets with temporary septic tank.</p> <p>e) Separate as best as possible concrete works in waterways and keep concrete mixing separate from drainage leading to waterways.</p> <p>f) Avoid any activity causing excessive erosion and turbidity.</p> <p>g) Keep waste and hazardous materials away from surface water bodies, drinking water sources and do not dispose of waste in creeks or rivers.</p> <p>h) Properly dispose contaminated wastewater and hazardous materials, if any, passing through conventional treatment process such as screening, settling, oil-water separation, etc.</p>
8. 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.
9. Solid and hazardous waste	<p>a) Segregate construction waste as recyclable, hazardous and non-hazardous waste.</p> <p>b) Reuse and recycle appropriate and viable materials.</p> <p>c) Collect, store and transport construction waste to appropriately designated/ controlled dump sites, where possible.</p> <p>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.</p> <p>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.</p> <p>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).</p> <p>g) Waste depots/storage/disposal should be contained, sealed and/or roofed/covered to prevent storm water contamination. Wastes need to be emptied regularly.</p> <p>h) After each construction site is decommissioned, all debris and waste shall be cleared.</p>
10. Asbestos	<p>a) If asbestos or asbestos containing materials (ACM) are found at a construction site, they should be clearly marked as hazardous waste.</p> <p>b) When possible, the asbestos should be appropriately contained and sealed to minimize exposure.</p> <p>c) Prior to removal, if removal is necessary, ACM should be treated with a wetting agent to minimize asbestos dust.</p> <p>d) If ACM is to be stored temporarily, it should be securely placed inside closed containers and clearly labeled.</p> <p>e) Removed ACM must not be reused.</p> <p>f) Dispose ACM as per national regulations and procedures</p>
11. Worker and Community Health and Safety	<p>a) When planning activities of each subproject, discuss steps to avoid people getting hurt. (Planning phase) It is useful to consider:</p> <ul style="list-style-type: none"> <li>• Construction place: Are there any hazards that could be removed or should warn people about?</li> <li>• The people who will be taking part in construction: Do the participants have adequate skill and physical fitness to perform their works safely?</li> <li>• The equipment: Are there checks you could do to make sure that the equipment is in good working order? Do people need any particular skills or knowledge to enable them to use it safely?</li> </ul>

	<ul style="list-style-type: none"> <li>• 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?</li> <li>b) Mandate the use of personal protective equipment for workers as necessary (gloves, dust masks, hard hats, boots, goggles). (Implementation phase)</li> <li>c) Follow the below measures for construction involve work at height (e.g. 2 meters above ground (Implementation phase): <ul style="list-style-type: none"> <li>• Do as much work as possible from the ground.</li> <li>• 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.</li> <li>• Only allow people with sufficient skills, knowledge and experience to perform the task.</li> <li>• Check that the place (eg a roof) where work at height is to be undertaken is safe.</li> <li>• Take precautions when working on or near fragile surfaces.</li> <li>• Clean up oil, grease, paint, and dirt immediately to prevent slipping; and</li> <li>• Provide fall protection measures e.g. safety harness, simple scaffolding/guard rail for works over 4 meters from ground.</li> </ul> </li> <li>d) Keep worksite clean and free of debris on daily basis. (Implementation phase)</li> <li>e) Provision of first aid kit with bandages, antibiotic cream, etc. or health care facilities and enough drinking water. (Implementation phase)</li> <li>f) Keep corrosive fluids and other toxic materials in properly sealed containers for collection and disposal in properly secured areas. (Implementation phase)</li> <li>g) Ensure adequate toilet facilities for workers from outside of the community. (Implementation phase)</li> <li>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)</li> <li>i) Ensure structural openings are covered/protected adequately. (Implementation phase)</li> <li>j) Secure loose or light material that is stored on roofs or open floors. (Implementation phase)</li> <li>k) Keep hoses, power cords, welding leads, etc. from laying in heavily traveled walkways or areas. (Implementation phase)</li> <li>l) If school children are in the vicinity, include traffic safety personnel to direct traffic during school hours, if needed. (Implementation phase)</li> <li>m) Control driving speed of vehicles particularly when passing through community or nearby school, health center or other sensitive areas. (Implementation phase)</li> <li>n) During heavy rains or emergencies of any kind, suspend all work. (Implementation phase)</li> <li>o) Fill in all earth borrow-pits once construction is completed to avoid standing water, water-borne diseases and possible drowning. (Post-Implementation phase)</li> </ul>
12. Shelters, community centers, schools, kindergartens.	<ul style="list-style-type: none"> <li>a) Design of schools, community centres, markets should follow relevant requirements on life and fire safety required by National Building Codes and relevant guidelines from the concerned Ministries. (Planning phase)</li> <li>b) Schools: Maximise natural light and ventilation systems to minimise needs for artificial light and air conditioning; use large windows for bright and well-ventilated rooms. (Planning phase)</li> </ul>
13. Other	<ul style="list-style-type: none"> <li>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)</li> <li>b) No hunting, fishing, capture of wildlife or collection of plants. (Implementation phase)</li> <li>c) No use of unapproved toxic materials including lead-based paints, un-bonded asbestos, etc. (Implementation phase)</li> <li>d) No disturbance of cultural or historic sites. (Planning and implementation phases)</li> </ul>

## ANNEX 5: 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. Include permit and licensing requirements. It should also include the applicable World Bank ESSs (Environmental and Social Standards). Also include a section on the relevant EHSGs (Environmental, Health and Safety Guidelines).*

### 3. ESMP Matrix: Risk and Impacts, Mitigation, and Monitoring

*This section should identify and summarize all anticipated adverse environmental and social risks and impacts and describe with technical details each mitigation measures to address these risks and impacts (attach designs, equipment descriptions, and operating procedures, as needed); and list the General Conditions of Contract/Particular Condition of Contract GCC/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 5 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.*

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 8 for guidance on some of these plans).*

## ANNEX 6: 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 Guyana 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 Guyana 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
<b>Conditions of employment</b> 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 15 in Guyana  In Grenada and Saint Lucia, there are gaps in the legal protections given to children under the age of 18 from involvement in hazardous work. Guyana prohibits employment of persons under the age of 18 where any work is likely to jeopardize the health, safety and morals of young persons.	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.
<b>Anti-discrimination and SEA/SH</b> 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.
<b>Industrial relations</b> 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 Guyana's Labor Act.	The LMP and associated CoC will be shared with employers and workers' organizations.
<b>Occupational health and safety</b>	Legislation and regulations necessary to develop and implement procedures to establish and maintain a safe working	Information dissemination and awareness raising regarding the LMP will be

ESS2 requirement	Gaps between legislation and ESS2	Mitigation measures
ESS2 imposes general requirements related to occupational health and safety to all project workers.	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.	prioritized from project inception and designed to reach all project workers.

### Labour Relations and Occupational Health and Safety Legislation in Grenada

The overarching major national labour 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 Labour. The guiding principles reside on the prohibition of forced labour, discrimination, equal pay for equal work, as well as remedies for infringements of rights. The Employment Act strictly prohibits discrimination of employees based on race, colour, 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, organisation 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 Labour Legislation

Legislation	Description
<b>Employment Act of 1999</b>	Regulates the terms and conditions of employment and contains provisions on the establishment and functions of the Department of Labour
<b>The Factories Act of 1973</b>	The main law governing occupation safety and health implemented by means of a number of detailed regulations.
<b>The Accidents and Occupational Diseases (Notification) Act, 1951</b>	Regulates notification of accidents and occupational diseases.
<b>Right of Association (Agriculture) Convention, 1921 (No. 11)</b>	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.
<b>Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)</b>	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.
<b>Occupational Safety and Health Convention, 1981 (No. 155)</b>	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.

### **Labour 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
<b>Labour Act of Saint Lucia (Amended 2006)</b>	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.
<b>Saint Lucia Education Act (1999)</b>	Sets the minimum school leaving age as 15.

#### **Labour Relations and Occupational Health and Safety Legislation in Guyana**

Pursuant to Article 22 of Guyana's Constitution, every citizen has the right to work and its free selection in accordance with social requirements and personal qualifications. He or she has the right to be rewarded according to the nature, quality and quantity of his work. Women and men have the right to equal pay for equal work. The Constitution guarantees the right to rest, recreation and leisure. Article 29 of the Constitution states that "women and men have equal rights and the same legal status in all spheres of political, economic, and social life. All forms of discrimination against women based on their sex is illegal". In addition, the Constitution lists a number of women's rights, such as the access to academic, vocational, and professional training, equal opportunities in employment, remuneration and promotion, paid leave for mothers and expectant mothers. In accordance with Article 140 of the Constitution, no person shall be held in slavery or servitude, nor be required to perform forced labour. Article 147 specifically recognizes freedom of association and the right to form trade unions. There are a number of laws and regulations that make up what is referred to as the labour laws.

Specifically, Guyana's Labour Act specifies the conditions that an employer must observe in the contracting employees. The Labour Act of 1942 is an Act to provide or the establishment of a Department of Labour, for the regulation of the relationship between employers and employees and for the settlement of differences between them. The Act deals with the Regulation of Wages, the Rights of the Employees and Duties and Obligations of Employees, Payment of Wages and Deductions therefrom. It outlines the Hours of Work of the Employers, Collective Agreements, and Miscellaneous such as information sharing and appointment and powers of Labour Officers.

#### **Guyana National Labour Legislation**

Legislation	Description
<b>The Labour Act of 1942 (Amended 1997)</b>	The Labour Act of 1942 specifies the conditions that an employer must observe in the contracting employees. The Labour Act of 1942 is an Act to provide or the establishment of a Department of Labour, for the regulation of the relationship between employers and employees and for the settlement of differences between them. The Act deals with the Regulation of Wages, the Rights of the Employees and Duties and Obligations of Employees, Payment of Wages and Deductions therefrom. It outlines the Hours of Work of the Employers, Collective Agreements, and

	Miscellaneous such as information sharing and appointment and powers of Labour Officers.
<b>Occupational Health and Safety Act of 1997 (Amended 2009)</b>	The Occupational Safety and Health Act Chapter 99:06 was enacted in 1997 and was amended in 2009. It is an Act to promote and provide for the wellbeing of the employees as it relates to their interaction with the physical work environment. The Act defines the responsibilities of management and workers with respect to safety and health and applies to every workplace in Guyana. The Act makes provisions for the establishment of an Occupational Safety and Health Authority, the establishment of a National Advisory Council on Occupation Safety and Health, the duties of employers, workers and other persons, treatments of accidents and occupational diseases, and occupational safety and health regulations.
<b>Prevention of Discrimination Act 1997</b>	<p>The Prevention of Discrimination Act Chapter 99:08 of 1997 provides for the elimination of discrimination in employment, training, recruitment and membership of professional bodies and the promotion or equal remuneration to men and women in employment who perform work of equal value, and for matter connected therewith. The Act outlines the prohibited ground for discrimination, which includes race, sex, religion, colour, ethnic origin, indigenous population, national extraction, social origins, economic status, political opinions, disability, family responsibility, pregnancy, marital status, or age, except for purpose of retirement and restriction on work and employment on minors.</p> <p>The 1997 Act further states that any act or omission, or any practice or policy that directly or indirectly result in discrimination against a person on the grounds stated is an act of discrimination regardless of whether the person the person responsible for the act or omission or the practice or policy intended to discriminate.</p> <p>The Prevention of Discrimination Act 1997 advocates for the promotion of equal remuneration by stating that every employer and every person acting on behalf of such employer shall be obligated to pay equal remuneration to men and women performing work of equal value for such employer.</p>
<b>The Employment of Young Persons and Children Act 1938 (Amended 1999)</b>	The Employment of Young Persons and Children Act 1938, amended 1999, is an Act relating to the employment of young person and children. It established that no child under the age of fifteen shall be employed, and no young person under the age of sixteen shall be employed at night in any industrial undertakings except to the extent to which and in the circumstances in which such employment is permitted under the International Labour Organisation (ILO) Convention. The Act outlines the offences and regulations as it relates to the employment of young person and children.

### 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.
- 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 as COVID-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 and 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. There are allegations of forced labor risks associated with suppliers of polysilicon, a high-purity form of silicon that is a key raw material in the PV supply chain. To help Project countries benefit from economies of scale in procuring the necessary equipment, the OECS Commission will provide a pooled procurement service to the Project. The OECS Commission, 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 is a significant risk of forced labor related to primary supply workers, the OECS Commission will require the primary supplier to identify those risks and if forced labor cases are identified, the OECS Commission will require the primary supplier to take appropriate steps to remedy them. Ultimately, where remedy is not possible, the OECS Commission 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 OECS Commission will undertake market analysis to identify the possible sellers of solar panels to the project. The bidding documents will emphasize forced labor risks in solar panels and components and will require that sellers of solar panels 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.

### **Institutional Arrangement for Implementation of the LMP**

The PIUs will carry the main responsibility for the implementation and monitoring of the LMP. In Grenada and Saint Lucia, 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. In Guyana, the Social and Environmental Officer will be responsible for this activity.

## **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 COVID-19 transmission. For non-urgent complaints, the Grievance Coordinator will aim to resolve complaints within 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 7: CODE OF CONDUCT TEMPLATE (PIU STAFF)

I, \_\_\_\_\_, staff at the PIU in [name of Ministry/Agency where the PIU sits] for the Caribbean Efficient and Green-Energy Buildings 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:

#### General:

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<sup>5</sup> 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.

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<sup>5</sup> 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.

#### 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.
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] (Grenada, Saint Lucia)/Office of the Prime Minister (Guyana) 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] (Grenada, Saint Lucia)/Office of the Prime Minister (Guyana) 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] (Grenada, Saint Lucia)/Office of the Prime Minister (Guyana)
- termination of employment

#### Infringements sanctioned with verbal notification:

Those behaviours that do not cause relevant risks to the Ministry of [specify ministry where the PIU sits] (Grenada, Saint Lucia)/Office of the Prime Minister (Guyana), other workers and/or its relationship with the communities. Verbal warnings may involve a reminder of the Code of Conduct and its applicability.

Infringements sanctioned with written notification:

Those behaviors that cause minor risk to the Ministry of [specify ministry where the PIU sits] (Grenada, Saint Lucia)/Office of the Prime Minister (Guyana), other workers and/or its relationship with the communities and/or the environment.

Infringements sanctioned with termination of employment:

Those behaviours that cause substantive risks to the Ministry of [specify ministry where the PIU sits] (Grenada, Saint Lucia)/Office of the Prime Minister (Guyana), 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 8: 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:

22. carry out their duties competently and diligently;
23. 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;
24. 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.
25. 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;
26. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;

27. 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;
28. 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;
29. 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;
30. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
31. 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);
32. report violations of this Code of Conduct; and
33. 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 9: 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

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

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

<b>C2: Corrective Actions from the investigation to be implemented (To be fully described in Corrective Action Plan)</b>		
Action	Responsible Party	Expected Date

<b>C3a: Fatality/Lost time Injury information</b>						
Cause of fatality/injury for worker or member of the public (please check all that apply):						
1. Caught in or between objects <input type="checkbox"/> 2. Struck by falling objects <input type="checkbox"/> 3. Stepping on, striking against, or struck by objects <input type="checkbox"/>						
4. Drowning <input type="checkbox"/> 5. Chemical, biochemical, material exposure <input type="checkbox"/>						
6. Falls, trips, slips <input type="checkbox"/>						
7. Fire & explosion <input type="checkbox"/>						
8. Electrocution <input type="checkbox"/> 9. Homicide <input type="checkbox"/> 10. Medical Issue <input type="checkbox"/> 11. Suicide <input type="checkbox"/> 12. Others <input type="checkbox"/>						
Vehicle Traffic: 13. Project Vehicle Work Travel <input type="checkbox"/> 14. Non-project Vehicle Work Travel <input type="checkbox"/> 15. Project Vehicle Commuting <input type="checkbox"/>						
16. Non-project Vehicle Commuting <input type="checkbox"/> 17. Vehicle Traffic Accident (Members of Public Only) <input type="checkbox"/>						
Name	Age/DOB	Date of Death/Injury	Gender	Nationality	Cause of Fatality/Injury	Worker (Employer)/Public

<b>C3b: Financial Support/Compensation Types (To be fully described in Corrective Action Plan template)</b>			
1. Contractor Direct <input type="checkbox"/> 2. Contractor Insurance <input type="checkbox"/> 3. Workman's Compensation/National Insurance <input type="checkbox"/>			
4. Court Determined Judicial Process <input type="checkbox"/> 5. Other <input type="checkbox"/> 6. No Compensation Required <input type="checkbox"/>			
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 impairment 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 10: 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.

Stage	Mitigation Measures <sup>6</sup>
Before using pesticides	<ol style="list-style-type: none"><li>1. Minimize the need for pesticides by practicing integrated management by control strategies such as cultural control, mechanical control, physical control, biological control and chemical control.</li><li>2. Receive recommendations from [relevant national agencies] for proper management method for specific crop.</li></ol>
General precautions	<ol style="list-style-type: none"><li>1. Only choose the pesticides labelled in the national language and do not use the pesticides without any label or with foreign language labels.</li><li>2. Select the pesticide which is suitable for specific pests and target plants as described on the label.</li><li>3. Do not mix any two or more pesticides at the same time.</li><li>4. Follow the instructions for use and the pre-harvest interval (PHI) as prescribed on the label.</li><li>5. Use appropriate and correct application techniques to ensure safety for the health of humans, animals and the environment.</li></ol>
Label Reading	<ol style="list-style-type: none"><li>1. Check the pesticide registration number on your product.</li><li>2. Review the date of manufacture and date of expiry.</li><li>3. Read the active ingredient and pesticide group on your product.</li><li>4. Read the target pests, dosage of product.</li></ol>

<sup>6</sup> Instructions from Safe Use of Pesticides by WHO.

Stage	Mitigation Measures <sup>6</sup>
	<p>5. Read the pre-harvest interval (PHI).</p> <p>6. Read the storage and disposal procedure for the product.</p> <p>7. Read the first aid procedure.</p> <p>8. Follow the instructions and safety precautions precisely written on the label.</p>
Storage and Transport	<p>1. Store pesticides in a certain place that can be locked and not accessible to unauthorized people or children.</p> <p>2. Never be kept in a place where they might be mistaken for food or drink.</p> <p>3. Keep them dry but away from fires and out of direct sunlight.</p> <p>4. Store away from water sources.</p> <p>5. Should be transported in well-sealed and labelled containers.</p> <p>6. Do not carry them in a vehicle that is also used to transport food.</p>
Handling / Application	<p><b>From Environmental Safety Aspect –</b></p> <p>1. Application rates must not exceed the manufacturer's recommendations.</p> <p>2. Avoid application of pesticides in wet and windy conditions.</p> <p>3. Pesticides must not be directly applied to streams, ponds, lakes, or other surface bodies.</p> <p>4. Maintain a buffer zone (area where pesticides will not be applied) around water bodies, residential areas, livestock housing areas and food storage areas.</p> <p><b>From Health and Safety of User Aspect –</b></p> <p>1. Use suitable equipment for measuring out, mixing and transferring pesticides.</p> <p>2. Do not stir liquids or scoop pesticides with bare hands.</p> <p>3. Do not spray pesticides at the down-stream direction and during the strong wind.</p> <p>4. Do not spray pesticides during the highest temperatures of the day (noon).</p> <p>5. Do not suck or blow the blocked nozzle.</p> <p>6. Do not assign pregnant women, lactating mother and children under 18 for handling and use of pesticides.</p> <p>7. Protective gloves, shoes, long-sleeved shirt and full trousers shall always be worn when mixing or applying pesticides.</p> <p>8. Respiratory devices (nose mask) shall be used to avoid accidental inhaling.</p> <p>9. In case if any exposure/body contact with the pesticide, wash-off and seek medical aid.</p>
Disposal	<p><b>From Environmental Safety Aspect –</b></p> <p>1. Dispose any left-over pesticide by pouring it into a pit latrine.</p> <p>2. It should not be disposed of where it may enter water used for drinking or washing, fish ponds, creeks or rivers.</p> <p>3. Do not dispose any empty containers into river, creek, fish ponds and water way.</p> <p>4. Do not burn any empty containers.</p> <p>5. Decontaminate the pesticide containers by triple rinsing and use for next application. i.e. part-filling the empty container with water three times and emptying into a bucket or sprayer for next application.</p> <p>6. All empty package and containers should be returned to the designated organization / individual for safe disposal.</p> <p>7. If safe disposal is not available, bury the empty package and containers at least 50cm (20 inches) from ground level as much as possible.</p> <p>8. The hole / disposal site must be at least 100 meters (~300 ft) away from the streams, wells and houses.</p> <p>9. Do not reuse empty pesticide containers for any purposes.</p>
Personal Hygiene	<p>1. Never eat, drink or smoke while handling pesticides.</p> <p>2. Change clothes immediately after spraying pesticides.</p> <p>3. Wash hands, face, body and clothes with plenty of water using soap after pesticides handling.</p>
Emergency Measures	<p><b>Indications of Pesticide Poisoning</b></p> <p><b>General:</b> extreme weakness and fatigue.</p> <p><b>Skin:</b> irritation, burning sensation, excessive sweating, staining.</p> <p><b>Eyes:</b> itching, burning sensation, watering, difficult or blurred vision, narrowed or widened pupils.</p> <p><b>Digestive system:</b> burning sensation in mouth and throat, excessive salivation, nausea, vomiting, abdominal pain, diarrhea.</p> <p><b>Nervous system:</b> headaches, dizziness, confusion, restlessness, muscle twitching, staggering gait, slurred speech, fits, unconsciousness.</p>

Stage	Mitigation Measures <sup>6</sup>
	<p><b>Respiratory system:</b> cough, chest pain and tightness, difficulty with breathing, wheezing.</p> <p><b>Responsiveness</b></p> <p><b>General:</b> If pesticide poisoning is suspected, first aid must be given immediately, and medical advice and help must be sought at the earliest opportunity. If possible, the patient should be taken to the nearest medical facility.</p> <p><b>First Aid Treatment</b></p> <p><b>If breathing has stopped:</b> Give artificial respiration (i.e. mouth to mouth resuscitation if no pesticide has been swallowed.)</p> <p><b>If there is pesticide on the skin:</b> Remove contaminated clothing from the patient and remove the patient from the contaminated area. Wash the body completely for at least 10 minutes, using soap if possible. If no water is available, wipe the skin gently with cloths or paper to soak up the pesticide. Avoid harsh rubbing or scrubbing.</p> <p><b>If there is pesticide in the eyes:</b> Rinse the eyes with large quantities of clean water for at least five minutes.</p> <p><b>If there is ingestion:</b> Rinse mouth, give water to drink. Never induce vomiting in unconscious or confused persons, seek medical advice immediately.</p>

**Trainings.** Trainings on pesticide management should be provided to the workers. The following trainings on pesticide management are recommended to be provided:

- Training on Policy, Laws and Regulations Regarding to Pesticides Use: To provide basic knowledge about the national laws, rules and regulations.
- Trainings for Pest Management: To provide trainings to clearly understand the technical aspect of pesticide and skill in using them such as what are the eligible and prohibited items of pesticide under national regulations, the level of negative impact of each eligible item, how to use them, how to protect and minimize the negative impact on the environment and human while using them, how to keep them before and after used etc.
- Storage, handling, usage and disposal of pesticide; To provide trainings about the procedures of storage, handling, usage of pesticide and disposal of pesticides residues or empty containers without affecting the health and safety of user, nearby community and the environment.

## ANNEX 11: 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 12: BI-ANNUAL PROJECT PROGRESS REPORTING TEMPLATE

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

### **The Caribbean Efficient and Green-Energy Buildings Project (P179519)**

#### **Monitoring report on Environmental and Social Standards**

**Country:** [Official name of the country reporting]

**Period:** [Period of reporting]

#### **SECTION I – PROJECT PROGRESS**

<b>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)</b>

#### **SECTION II - ESCP**

<b>MATERIAL MEASURES AND ACTIONS</b>		<b>DETAILS</b>
<b>MONITORING AND REPORTING</b>		
A	<b>REGULAR REPORTING</b> The project has been submitting bi-annual monitoring reports on the environmental, social, health, and safety (ESHS) performance and the implementation of the ESCP?  <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES: provide dates of previous Reports  If NO, please briefly explain.
B.	<b>INCIDENTS AND ACCIDENTS</b> Any incidents and/or accidents during the reporting period?  <input type="checkbox"/> Yes <input type="checkbox"/> 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.
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>		

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

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

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

MATERIAL MEASURES AND ACTIONS		DETAILS
	<p><b>TRAINING</b></p> <p>Any new training activities to project workers and contracted workers during this reporting period?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	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 III – 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 IV – 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 Memoir.**

Staff Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## ANNEX 13: 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/Social and Environmental Officer and appropriate CLO (see 6.1c on Implementation and Monitoring).*

### 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 Manager: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Date: \_\_\_\_\_