**Saint Lucia**

**Human Capital Resilience Project-P1700445**

**DRAFT ENVIRONMENTAL and SOCIAL**

**COMMITMENT PLAN (ESCP)**

**November 30, 2019**

**Saint Lucia**

**Human Capital Resilience Project-P1700445**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. Saint Lucia is planning to implement the Human Capital Resilience Project, (the ***Project***), with the involvement of the following Ministries: Ministry of Education, Innovation and Gender Relations (hereinafter Ministry of Education), Ministry of Equity, Social Justice, Empowerment and Human Services (hereinafter Ministry of Equity), Ministry of Labor, Ministry of Economic Development, Transport and Civil Aviation and the Ministry of Finance. The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. Saint Lucia will implement material measures and actions so that the Project is implemented in accordance with the World Bank Environmental and Social Standards (***ESSs***). This Environmental and Social Commitment Plan (***ESCP***) sets out the material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The ESCP will also comply with the provisions of any other environmental and social documents required under the ESSs and referred to in this ESCP, such as the Social Assessment (SA), the Stakeholder Engagement Plan (SEP) and the Labor Management Procedures (LMP) that have been developed for the Project.
4. Saint Lucia is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the Saint Lucia as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and Saint Lucia, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, Saint Lucia, through the Minister responsible for Education will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Minister responsible for Education. The Ministry of Education will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Saint Lucia shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

| **MATERIAL MEASURES AND ACTIONS**  | **TIMEFRAME** | **RESPONSIBILE ENTITY/AUTHORITY**  |
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| **MONITORING AND REPORTING** |
| A | **REGULAR REPORTING** Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s). | Bi-annual (every 6 months) throughout Project implementation.  | Ministry of Education. |
| B | **INCIDENTS AND ACCIDENTS** Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.  | Any incident or accident shall be notified to the Association within 72 hours after taking note of the incident or accident. Timing on the submission of any subsequent report would be specified by the Association.  | Ministry of Education. |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** |
| 1.1 | **ORGANIZATIONAL STRUCTURE** The PIU to be established under the Department of Education will include one (1) Environmental and Social Specialist with qualifications and experience acceptable to the Association, to support management of the ESHS aspects of the Project.  | E&S Specialist will be on board within 3 months of Project effectiveness and maintained throughout Project implementation*.*  | Ministry of EducationMinistry of Equity  |
| 1.2 | **SOCIAL ASSESSMENT**Implement the measures contained in the Social Assessment (SA) prepared for the Project, in a manner acceptable to the Association. | Draft SA has already been prepared (Oct 30), and will be finalized and disclosed in external websites by December 12, 2019. Identified measures contained in the Social Assessment will be carried out throughout the Project implementation. | Ministry of Education. |
| 1.3. | **TECHNICAL ASSISTANCE to be contract by the PIU.**Ensure that the terms of reference for studies, capacity building, training and any technical assistance activities carried out under the Project are acceptable to the Association and duly incorporate and take into consideration, the provisions of the Social Assessment, the Stakeholder Engagement Plan, the ESCP and the requirements of the ESSs, as applicable.  | Throughout Project implementation | Ministry of Education |
| 1.4 | **MANAGEMENT OF CONSULTANTS**Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with consultants. Thereafter ensure that the consultants comply with the ESHS specifications of their respective contracts. | Prior to the preparation of procurement documents. Implement throughout Project implementation. | Ministry of Education |
| **ESS 2: LABOR AND WORKING CONDITIONS**  |
| 2.1 | **LABOR MANAGEMENT PROCEDURES**Update the draft Labor Management Procedures (LMP) that have been developed for the Project, and thereafter, implement the revised LMP, in a manner acceptable to the Association.  | The revised LMP will be finalized no later than two (2) weeks after Project effectiveness and implemented throughout Project implementation. | Ministry of Education |
| 2.2 | **GRIEVANCE MECHANISM FOR PROJECT WORKERS** Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.  | Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation. | Ministry of Education |
| 2.3 | **OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES**Prepare, adopt, and implement occupational, health and safety (OHS) measures as described in the LMP. | Same timeframe as 2.1 | Ministry of Education |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**  |
|  | This Standard is currently not relevant |  |  |

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| **ESS 4: COMMUNITY HEALTH AND SAFETY**  |
|  | This Standard is currently not relevant |  |  |

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| **ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT**  |
|  | This Standard is currently not relevant |  |  |
| **ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES**  |
|  | This Standard is currently not relevant |  |  |
| **ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES**  |
|  | This Standard not relevant |  |  |
| **ESS 8: CULTURAL HERITAGE**  |
|  | This Standard is currently not relevant |  |  |

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| **ESS 9: FINANCIAL INTERMEDIARIES**  |
|  | This Standard is currently not relevant |  |  |
| **ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE** |
| 10.1 | **STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION**Implement the measures contained in the Stakeholder Engagement Plan (SEP). | October 30, 2019. Review Maintained and implemented throughout Project implementation. | Ministry of Education |
| 10.2 | **PROJECT GRIEVANCE MECHANISM**: Establish, maintain and operate a grievance mechanism, as described in the SEP. | The GRM is part of the SEP and is already in place (Oct 30). It will be maintained and implemented throughout Project implementation. | Ministry of Education |
| **CAPACITY SUPPORT (TRAINING)** |
| CS1 | Training on:* Environmental and Social Standards
* Citizen engagement and stakeholder engagement.
* Monitoring and Evaluation
 |  Once the of PIU is established and staffed, especially, Project coordinator, technical officer, procurement specialist and Safeguards Specialists | Ministry of Education |