

HSSP PBF – RICHFOND WELLNESS CENTRE RENOVATION WORKS
Environmental and Social Code of Practice (ESCoP)



Saint Lucia Health System Strengthening Project
(P166783)

September 2024

Acronyms and Abbreviations

| | |
|-------------------|---|
| CARPHA | Caribbean Public Health Agency |
| CERC | Contingent Emergency Response Component |
| C-ESMP | Contractor's Environmental and Social Management Plan |
| CoC | Code of Conduct |
| EHD | Environmental Health Department |
| EHS | Environment, Health and Safety Guideline |
| EPHS | Essential Package of Health Services |
| ESMF | Environmental and Social Management Framework |
| ESCoP | Environmental and Social Code of Practice |
| ESMP | Environmental and Social Management Plan |
| ESHS | Environmental Social Health and Safety |
| E&S | Environmental and Social |
| GBV | Gender Based Violence |
| GCC | General Contract Condition |
| GM | Grievance Mechanism |
| GoSL | Government of St. Lucia |
| H&S | Health and Safety |
| HSSP | Health System Strengthening Project |
| MoHWEA PIU | Ministry of Health Wellness and Elderly Affairs Project Implementation Unit |
| OSH | Occupational Safety and Health |
| SEA | Sexual Exploitation and Abuse |
| SH | Sexual Harassment |
| SLSWMA | St. Lucia Solid Waste Management Authority |
| PBF | Performance Based Financing |
| PIU | Project Implementation Unit |
| PPD | Physical Planning Department |
| PPE | Personal Protective Equipment |
| RSLPF | Royal St. Lucia Police Force |
| SH | Sexual Harassment |
| SEA | Sexual Abuse and Exploitation |
| TOR | Terms of Reference |
| USD | United States Dollars |
| WBG | World Bank Group |

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1.0 Background

The Health System Strengthening Project (HSSP) is one of the most recent initiatives forged out of a partnership with the Government of Saint Lucia and the World Bank Group. The aim of the project is to improve the accessibility, efficiency, and responsiveness of healthcare delivery in Saint Lucia to its population. Improvement of the island's healthcare sector has been a long-standing priority for the Government of Saint Lucia (GoSL), however the high prevalence of non-communicable diseases coupled with the continuing threat of highly infectious diseases such as Coronavirus (COVID-19) and dengue have highlighted the demand for a heightened momentum to this commitment.

Within the HSSP there is a focus on four (4) major components which are as follows: Design and Implementation of an Essential Package of Health Services (EPHS); Strengthening of the Health sector's service delivery in support of the essential Package of Health Services (EPHS); Institutional Capacity building, Project Management and Coordination; and Contingent Emergency Response Component (CERC).

The first phase of HSSP implementation comprises the component of the Design and Implementation of the Essential Package of Health Services.

The aim of the second component is to strengthen the healthcare service delivery in support of the Essential Package of Health Services. The improvement of healthcare service delivery will be facilitated by the implementation of a Performance-Based Financing (PBF) system, the strengthening of the supply of healthcare services, and the improvement of public health emergency preparedness and response. To further execute the second component, steps will be taken to strengthen the supply of services at the primary health facilities and build capacity of the staff within the Department of Health and Wellness. The HSSP will support the Ministry of Health & Wellness and Elderly Affairs (MoHWEA) in identifying and addressing gaps in service provision inclusive of infrastructure, equipment, supplies and training of the healthcare sector workers and health facilities to ensure the necessary conditions and skills to provide the services.

The HSSP is managed by a stand-alone Project Implementation Unit (PIU), located within the Ministry of Health and Wellness. The PIU is responsible for the execution of the project components which includes oversight of refurbishment projects, compliance with local safeguards and local permit requirements during refurbishments/rehabilitations.

2.0 Introduction

The HSSP will be financed under Component 2, Strengthening of the Health sector's service delivery in support of the essential Package of Health Services (EPHS). The environmental and social impacts related to these renovation works are expected to be minor, temporary, localized and readily managed by industry standard and typical mitigation measures. Negative impacts expected during renovation are related to: air pollution caused by dust generated from cleaning of the old walls; noise; construction traffic movements; pollution from construction waste; working in confined spaces at height, and with electrical circuits; and undertaking the construction works within an operational hospital. Reflecting the nature and small scale of the proposed renovation work under the project, this Environmental and Social

Codes of Practice (ESCoP) describes the mitigation measures to be applied by the contractor to ensure that the environmental, social and health and safety risks are minimized. The mitigation measures are identified by reference to the General Conditions of Contract (GCC) of the World Bank's Small Works Standard Procurement Document that will be used to procure the Contractor undertaking the works. Where necessary, the ESCoP identifies E&S Specifications that are to be added to the procurement document to supplement the GCC, and ESCoPs that set out the detailed actions that the Works Contractor must undertake to deliver works to the agreed standard.

2.1 Purpose of the ESCoP

This ESCoP describes the avoidance, mitigation and/or management measures need to address the potential adverse E&S risks and impacts associated with activities during the renovation of the Richfond Wellness Centre, clearly identifying where the provisions of the Standard Procurement Document are adequate or where additional E&S Specifications are needed. Where delivery of good environmental, social, and health and safety practices require specific actions to be taken by the contractor, these have been described in sufficient detail for the Contractor to be able to implement without further planning.

Not only does the ESCoP identify the potential risks and impacts that may arise from the Wellness Centre refurbishment works, it also indicates what controls need to be integrated into the procurement process to ensure that the Contractor delivers the works in compliance with project requirements.

3.0 Scope of Refurbishment Works

The works are mainly minor rehabilitation works to include:

- (i) Removal and disposal of old metal water tank
- (ii) Repairing damaged rainwater guttering
- (iii) Replacement of all waste water pipes
- (iv) Installation of AC units in 2 treatment rooms
- (v) Drainage of existing AC units
- (vi) Installation of wall fans in patient waiting area
- (vii) Installing smoke detectors in all rooms (battery operated)
- (viii) Installation of Didier cupboard in pharmacy
- (ix) Extend walls to ceiling / rafters for consultation room
- (x) Fabrication of waiting benches
- (xi) Relocate 20 ft storage container and convert into a storeroom and small office
- (xii) Application of 2" of external concrete to address water issue at entrance canopy
- (xiii) Termite and rodent treatment
- (xiv) Pressure washing of external concrete surfaces, water tanks and generators.

4.0 Applicable National Environmental Policy and Legal framework

The Physical Planning and Development Act (No. 29 of 2001) Revised 2021, makes provisions 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 in Saint Lucia. The objects and purpose of the Act of is to maintain and improve the standard of building construction so as to secure human health and safety. Section 17 Subsection (1) (a) Uses and Operations Constituting and not Constituting Development, states that: the carrying out of works for the maintenance, improvement or other alteration of any building, if the works affect only the interior of the building or do not materially affect the external appearance of the building shall not be deemed for the purposes of this Act to involve the development of land and therefore does not require planning permission or Development Control Authority (DCA) approval. Given the small scale of the project works, and the nature of the works planning permission and DCA approval are not required. Nevertheless, all pertinent regulations for the protection of the environment and the safety of workers, including the Labour Code and applicable regulations will be adhered to during the construction activity.

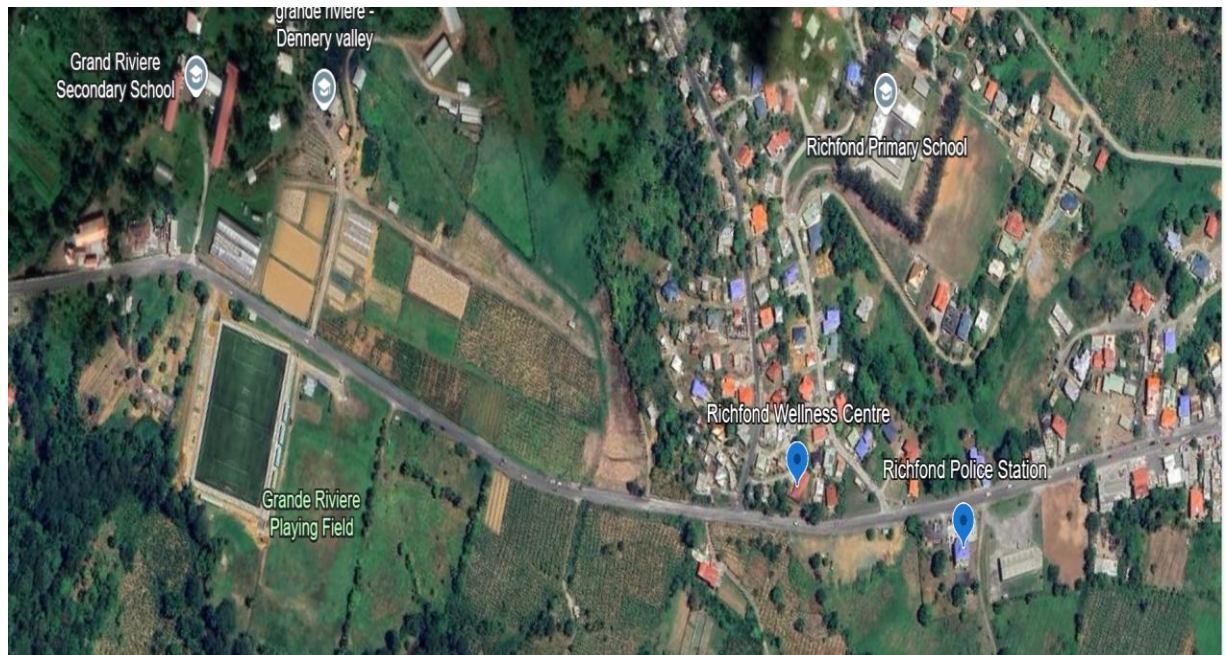
5.0 World Bank Safeguard Policies Triggered

OP/BP 4.01 Environmental Assessment is triggered for this project. There are likely to be some concerns relating to inconvenience or nuisance (e.g., dust, noise, and construction waste) to surrounding areas during construction. These potential impacts are regarded as minor, site-specific, and reversible in nature, and for which mitigation measures can be readily identified. Given the small scale and nature of these rehabilitation works it is considered appropriate to prepare an EScOP to address any potential adverse environmental and social impacts. No other environmental safeguard policies are triggered. Specifically, OP/BP 4.04 Natural Habitats is not triggered since civil works will occur at existing facilities, and as such will not cause any degradation of natural habitats. Similarly, the project will not degrade critical forest areas as defined under OP/BP 4.36 Forests. While the project will involve procurement and use of pesticides, OP 4.09 Pest Management was not triggered because the project Environmental and Social Management Framework (ESMF) specifies that only licensed, registered service providers will be used for termite and rodent treatment, for which a specification has been developed. No significant impacts on physical cultural resources are anticipated as defined under OP/BP 4.11 Physical Cultural Resources.

6.0 Site Specific Potential Environmental Risks and Impacts

The project will undertake the renovation of the existing Richfond Wellness Centre. Richfond also called the Valley, is a northern community in the Dennery district. The Richfond Wellness Centre is located on a slight elevation on the western periphery of the community bordering the Castries to Vieux Fort Highway, the main thoroughfare which links the districts along the eastern side of the island to Castries. A minor road which will serve as the main access for construction vehicular traffic links the Centre, to the highway.

Richfond has a population of approximately 763 (2022 *Population and Housing Census*) but the centre also serves a number of neighbouring communities including Grande Riviere, Morne Panache, Thomazo, Grande Ravine and La Caye with an approximate population of 2607 (2022 *Population and Housing Census*). The centre's operational hours are 8:00 am to 4:30 pm and the services include, doctor's clinics, pharmacy services, pre-natal and post-natal clinics, diabetic and hypertensive clinics.



Location of the Richfond Wellness Centre



Richfond Wellness Centre

A few private residences surround the centre. Approximately 287 metres away is the Richfond Primary School, the Grande Riviere Secondary School is 708 metres away and the Richfond Police Station is located roughly 186 metres away.

It is anticipated that the Wellness Centre will continue operations during the works consequently, internal construction activities will be undertaken mainly at night, but external activities a safe distance from the main Wellness Centre thoroughfares can be scheduled during the day. The La Ressource Wellness Centre which is a five-minute drive from the highway can also be utilized by clients seeking service.

The potential environmental and social impacts associated with civil works at the facility may include:

- impacts to contractors' personnel health and safety;
- Impacts on community health and safety particularly for patients and staff of the facility as works will be ongoing while the facility remains operational;
- issues arising from air pollution caused by dust and other air emissions;
- noise and vibration generated by construction equipment and trucks;
- damage caused by concrete wash water / pressure washing runoff and earth works;
- risks associated with the lack of and inconsistent use of personal protective equipment (PPE) by the contractor's personnel;
- hazards related to construction traffic;
- hazards from construction waste generation and disposal;
- risks associated with handling hazardous materials such as paints, fuels, oils, and pesticides;
- hazards from handling biomedical waste;
- unearthing items of historical or archaeological significance;
- personnel involved in construction activities will be exposed to typical risks associated with undertaking construction activities including the chance of injury from falls, burns, abrasions and electrocution and becoming adversely affected by exposure to chemicals and strong chemical odours;
- exposure to infectious / communicable diseases;
- disturbance to the normal operations of the centre;
- workplace discrimination.

It is anticipated that the potential negative environmental and social impacts will be minor, short-term and site-specific. These risks will be mitigated mainly through construction worker training and site management procedures. In the event of an onsite incident, investigation and response plans will be executed to mitigate their impact on individuals and on the wider community.

The fact that work will be ongoing while the Wellness Centre is still operational may pose further social and environmental risks which will require close monitoring of the ongoing works to identify areas requiring immediate remedial actions, to protect the health and safety of the patients and staff of the facility.

The positive impacts of this activity are expected to be, better public health outcomes as a result of an improved healthcare facility in the medium- long term, and in the short term increased economic activity related to the renovation works being undertaken at the wellness

centre. This may include the employment of persons from the community and increased revenue for truckers and other service providers.

6.1 Mitigation of the Associated Risks

The identified risks are readily manageable through standard operating procedures and good construction practices and the mitigation measures, monitoring and supervision responsibilities will be included in the contracts for the works.

Taking into consideration the type, location, sensitivity and scale of the planned works and the characteristics and size of potential impacts, preparation of the ESCoP is considered the most appropriate environmental safeguard instrument for this project. In preparing the ESCoP, references were made to applicable national environmental legal framework, World Bank operational policies and procedures, the project ESMF,¹ World Bank Group Environment Health and Safety Guidelines (EHSGs), and local construction guidelines.²

Rigorous application of the ESCoP will ensure that any adverse impacts caused by the works are avoided or minimized. Contractor specifications will address environmental issues, including construction dust and noise control, waste management and disposal, site management, and occupational and community health and safety measures covered in the ESCoP. These contractor specifications will be included in contractor bidding documents and/or in guidance provided by the Engineer to the contractor carrying out the works. Compliance is to be monitored throughout construction and the responsibilities, as detailed below, along with the corresponding General Contract Conditions (GCCs) to which the contractor must adhere.

¹ The project ESMF can be found at the following website:

<https://documents.worldbank.org/en/publication/documents-reports/documentdetail/217921528453817811/environmental-and-social-management-framework>

² The relevant EHSGs can be found at the following websites:

<https://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf> and

<https://documents1.worldbank.org/curated/en/118311496115696454/pdf/115328-WP-ENGLISH-Health-Care-Facilities-PUBLIC.pdf>

6.2 Table of Impacts & Mitigation Measures

Table 6.2 Construction Phase Impacts and Mitigation Measures

| Area | Potential Impacts / Issues | Mitigation Measures | Monitoring Requirements | Responsibility for Mitigation | Responsibility for Monitoring and Supervision | Comments / Relevant GCC |
|-------------------------------|------------------------------------|---|-------------------------|-------------------------------|---|--|
| Environmental Quality Control | Dust / air quality Moderate | <ul style="list-style-type: none"> – Keep roads and paths free of debris to minimize dust. – Cover construction materials storage areas. – Suppress dust around construction site through regular water spraying and/or installation of dust screen enclosures. – Do not permit open burning of construction and other waste materials on site. – Regularly maintain construction vehicles and machinery to minimize air emissions. – Discourage excessive idling of construction vehicles on site. – Cover materials while being moved in construction vehicles off site. | Throughout Construction | Contractor | PIU | <i>GCC 18.3 (b)</i> covers this requirement. |
| | Noise | <ul style="list-style-type: none"> – Choose construction machinery and equipment with low noise levels if utilizing. – During operations generators, air compressors and other powered mechanical equipment should be shielded, and equipment placed as far away from residential areas as possible. – Regularly maintain construction vehicles and machinery to avoid noise emissions. – Minimize construction vehicle speeds and use of | Throughout Construction | Contractor | PIU | <p><i>GCC 18.3 Protection of the environment</i></p> <p><i>(a) The Contractor shall take all necessary measures to: protect the environment (both on and off the Site); and</i></p> <p><i>(b) limit damage and nuisance to people and property resulting from pollution, noise and other results of the Contractor's operations and/or activities.</i></p> |

| Area | Potential Impacts / Issues | Mitigation Measures | Monitoring Requirements | Responsibility for Mitigation | Responsibility for Monitoring and Supervision | Comments / Relevant GCC |
|------|---|--|-------------------------|-------------------------------|---|--|
| | | horns especially at night. | | | | |
| | Water Pollution and Liquid Waste Management | <ul style="list-style-type: none"> Construction-related liquid wastes must not be allowed to accumulate on or off-site, and flow uncontrollably off the site. Runoff control measures such as hay bales and/or silt fences must be utilized to prevent damage to the ground from waste water, concrete wash water/ pressure washing runoff | Throughout Construction | Contractor | PIU | <i>GCC 18.3 covers this requirement.</i> |
| | Sanitary facilities during construction | <ul style="list-style-type: none"> Construction sites must be equipped with a toilet for workers. | Throughout Construction | Contractor | PIU | <i>18.2 and 18.3 covers this requirement. As the renovation works will be undertaken while the Wellness Centre remains operational, separate toilets for the workers may not be required, however, a specification will be included to ensure that the Contractor maintains any washrooms utilized by staff in a safe and sanitary condition, to not disrupt the hospital's operations</i> |
| | Solid Waste Management During Construction | <ul style="list-style-type: none"> Construction wastes should be separated into general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers. Contractors should minimize waste generation. Construction waste should be collected and disposed properly off site to the approved landfill. Records of waste disposal should be maintained as proof of proper management. Whenever feasible contractors should reuse and recycle appropriate and viable materials. | Throughout Construction | Contractor | PIU | <i>GCC18.3 – Protection of the environment covers this requirement.</i> |

| Area | Potential Impacts / Issues | Mitigation Measures | Monitoring Requirements | Responsibility for Mitigation | Responsibility for Monitoring and Supervision | Comments / Relevant GCC |
|---------------------|-------------------------------|---|-------------------------|-------------------------------|---|--|
| Safety and Security | Traffic and Pedestrian Safety | <ul style="list-style-type: none"> Contractors should put in place a traffic management system and conduct worker training to ensure safe public passage and to minimize traffic disruption by construction vehicles. Where reasonably practicable all loading and unloading of construction vehicles should be within the site boundary. No parking or stockpiling of materials will be allowed along the public roadway. No materials shall be stored so that they encroach on, or in any way adversely affect operation of, sections of roadway which are in use by the public or result in siltation or blockage of drains. Deliveries and collections should be scheduled to coincide with normal working hours. Access to and from construction sites should be organized to allow vehicles to enter and leave the site in a forward gear. Adequate lighting must be provided onsite particularly if work is to proceed after hours. Installation of proper signage and instructions. Onsite personnel should wear high-visibility clothes and reflective vests. Compliance with all guidelines and protocols established by the Department of Transport and Royal St. Lucia Police Force (RSLPF). | Throughout Construction | Contractor | PIU | <p><i>GCC 9.3 sets out the requirement for the contractor to put in place everything necessary for safe use of roads.</i></p> <p><i>The bidding document and contract will reference and/or incorporate the ESHS Specifications annexed to this ESCOP document, to which the Contractor will be bound.</i></p> |
| | Access Management | <ul style="list-style-type: none"> Construction sites should be fully enclosed to protect the public and deter unauthorized entry. Temporary safety fences should be | | | | |

| Area | Potential Impacts / Issues | Mitigation Measures | Monitoring Requirements | Responsibility for Mitigation | Responsibility for Monitoring and Supervision | Comments / Relevant GCC |
|--|----------------------------|---|-------------------------|-------------------------------|---|--|
| | | <p>appropriately high above ground level.</p> <ul style="list-style-type: none"> – When necessary, a gate marshal should be deployed to ensure the safety of pedestrians using adjacent public footpaths. – Working hours should be adjusted to take into account local traffic patterns, avoiding major transport activities during busy periods. – Contractors should ensure safe and continuous access to the Wellness Centre and residences. | | | | |
| Occupational and Community Health and Safety | Worker safety | <p>The bidding document and contract will require that the content of the Health and Safety Manual as required by the GCC shall only be the ESHS Specifications annexed to this ESCOP document, unless otherwise instructed by the Supervising Engineer. In addition:</p> <ul style="list-style-type: none"> – Skilled personnel should be engaged. – Appropriate sign-posting of construction sites should inform workers of rules and regulations to be followed. – Occupational health and safety training should be conducted regularly and reinforced by supervisory staff at construction sites. – Workers' PPE should comply with industry good practice (i.e., always hard hats and safety shoes, and as needed protective masks, safety glasses, hearing protection, and harnesses). – Contractors should adopt low noise equipment and reduce mechanical noise at construction sites. – All staff on site will receive training on reducing the risk of slippage and falls. | Throughout Construction | Contractor | PIU | <p><i>GCC 18.2 – sets out the safety requirements that the contractor will comply with. GCC 18.1, 9.4.2, 30.3 and 30.4 and contract Appendix B (Environmental and Social (E&S) Metrics for Progress Reports) are also applicable.</i></p> <p><i>As per GCC 9,1 qualified personnel must be engaged.</i></p> <p><i>As a minimum the Contractor will ensure that all workers participate in the general induction: General Induction for Construction Workers: Safety, Health and the Environment to be found here, https://www.wbgkggtf.org/node/3823 shall be provided as training to all Contractor's Personnel. Each Contractor's Personnel shall receive the general induction prior to their start of any Works activity on site, and at least midway through the work period.</i></p> <p><i>Records of the general induction training provided shall be kept. The record shall include a</i></p> |

| Area | Potential Impacts / Issues | Mitigation Measures | Monitoring Requirements | Responsibility for Mitigation | Responsibility for Monitoring and Supervision | Comments / Relevant GCC |
|------|--|---|-------------------------|-------------------------------|---|--|
| | Slippage and Falling, Working at Heights | <ul style="list-style-type: none"> Personnel will be required to wear appropriate PPE at all times. Scaffolding and harnesses will be utilized for working at heights. | | | | <p><i>copy of the induction given and as a minimum the following details:</i></p> <ul style="list-style-type: none"> <i>Name and signature (or mark) of trainee</i> <i>Employer/ organization they work for</i> <i>Date of induction training attended</i> <p><i>ESHS Specification No. 3 requires the Contractor to perform measures to handle specific risks associated with the performance of tasks at heights.</i></p> |
| | Working with Hazardous Substances | <ul style="list-style-type: none"> Staff are to be provided with adequate PPE and training for interactions with medical waste, fuels and other hazardous materials, including pesticides. | | | | <p><i>ESHS Specification No. 2 requires the Contractor to follow measures to handle specific risks associated with the performance of tasks particularly tasks which may involve the handling of hazardous wastes. The specification also mandates that the Contractor adhere to National, Regional and International regulations regarding the use of pesticides and not use banned or prohibited pesticides during the works as well as to purchase pesticides from an approved supplier and use a registered licensed pest control service company.</i></p> |

| Area | Potential Impacts / Issues | Mitigation Measures | Monitoring Requirements | Responsibility for Mitigation | Responsibility for Monitoring and Supervision | Comments / Relevant GCC |
|------|--|---|-------------------------|-------------------------------|---|---|
| | Exposure to VOCs | <p>Painting and the use of chemicals with strong odours can have an adverse effect on the construction team and users of the facility. The following are therefore required:</p> <ul style="list-style-type: none"> - Proper Use of PPE - Scheduling painting for periods when the facility will be closed - Use of water-based paints where possible | | | | <p><i>GCC 18.2 – sets out the safety requirements that the contractor will comply with.</i></p> <p><i>GCC 18.3 protection of the environment is also relevant</i></p> <p><i>A specification will be included to ensure that paints and other chemicals with strong odours are utilised outside of the hospital’s operating hours.</i></p> |
| | Exposure to infectious / communicable diseases | <p>Although COVID-19 is no longer a public health emergency, staff may also encounter other workers onsite who may present with infectious diseases including those of a respiratory nature. Accordingly:</p> <ul style="list-style-type: none"> – The Contractor must ensure that persons presenting with symptoms of respiratory illness should remain off the project site until they recover. – Alternatively based on the recommendation of the worker’s healthcare provider, the worker may be allowed to work onsite while maintaining strict social distancing and wearing appropriate PPE. | | | | <p><i>GCC 18.2 is relevant</i></p> |
| | Working with Biomedical Waste | <p>Onsite staff may encounter medical waste during renovation. In such cases:</p> <ul style="list-style-type: none"> – The Contractor will follow the National Guidelines | | | | |

| Area | Potential Impacts / Issues | Mitigation Measures | Monitoring Requirements | Responsibility for Mitigation | Responsibility for Monitoring and Supervision | Comments / Relevant GCC |
|------|---|--|-------------------------|-------------------------------|---|--|
| | | <p>for the handling and disposal of bio- medical waste</p> <ul style="list-style-type: none"> – The contractor will provide employees with adequate PPE and training for interactions with medical waste and other hazardous materials. | | | | |
| | Security of public | <p>The use of signage to inform the public of the ongoing works. The sign should include relevant information on the contractor, client, funding agency and the timeframe.</p> <p>The use of lights, guards, fencing etc. for protection of the works and for the safety and convenience of the public.</p> <ul style="list-style-type: none"> – The contractor should procure the requisite insurances. – Undertake a public awareness campaign to inform the public of the works and the need to be vigilant and to adhere to security measures that are in place at the site. – Publicize the grievance mechanism at stakeholder engagements and during the public awareness campaign. | | | | <p><i>GCC 18.2 and 29 set out the safety requirements that the contractor will comply with.</i></p> <p><i>The bidding document and contract will reference and/or incorporate the ESHS Specifications annexed to this ESCOP document, to which the Contractor will be bound.</i></p> <p><i>The PIU will undertake the communication with the public.</i></p> |
| | Risk of Social Conflict with the Contractor's personnel and the wider public. | <ul style="list-style-type: none"> – Any conflict between the onsite personnel and members of the public should be reported to the PIU and the relevant authorities. – The Contractor should assign responsibility for dealing with complaints from the general public to the site foreman or supervisor. Reports will also be accepted during consultations with stakeholders | Throughout Construction | Contractor | PIU | <p><i>GCC 9.4.1 and contract Appendix C cover this requirement.</i></p> <p><i>The COC in section IV (bidding Forms) will apply.</i></p> |

| Area | Potential Impacts / Issues | Mitigation Measures | Monitoring Requirements | Responsibility for Mitigation | Responsibility for Monitoring and Supervision | Comments / Relevant GCC |
|------|----------------------------|--|-------------------------|-------------------------------|---|--|
| | Stakeholder Engagement | <p>and the wider public.</p> <ul style="list-style-type: none"> – The Contractor should establish a Grievance Redress Mechanism (GRM) for the communities and workers which sets out the relevant dates, details of the complainant, the nature of the complaint, action taken, and other relevant details. – The contractor should take appropriate measures to ensure protection against discrimination. – The Contractor will maintain a CoC for all personnel, including the sub-contractors for site activities. The CoC will form part of the workers’ and sub-contractor contracts. Worker training shall include sensitization on the CoC and interactions with the general public. – The CoC will prohibit all forms of sexual exploitation and abuse and sexual harassment (SEA/SH). – Ensure protection against discrimination. – The GRM will have a channel for the uptake of grievances related to SEA/SH and gender-based violence (GBV). <p>The Contractor shall:</p> <ul style="list-style-type: none"> – Promote the GRM through ongoing community outreach and consultation. – Ensure that there is adequate stakeholder consultation. – Provide relevant contract-related information, as the Employer and/or Project Manager may reasonably request to conduct Stakeholder | | | | <i>GCC 26.1 covers this requirement.</i> |

| Area | Potential Impacts / Issues | Mitigation Measures | Monitoring Requirements | Responsibility for Mitigation | Responsibility for Monitoring and Supervision | Comments / Relevant GCC |
|--|--|---|-------------------------|-------------------------------|---|--|
| | | engagements. – Directly participate in Stakeholder engagements, as the Employer and/or Project Manager may reasonably request. | | | | |
| Excavation | Collapse or cave - in Falls into the trench | – The Contractor will use measures to prevent cave-ins or collapses. – The Contractor will use barriers to prevent falls into any excavated areas. – Additional precautions will be taken at night to prevent falls. | During excavation | Contractor | PIU | <i>GCC 29.1, 27.3, 18.1, 18.2 covers this requirement. A specification will be included to ensure that the Contractor puts measures such as sturdy wire mesh, fencing, barricades, or other similar type of fencing in place to prevent persons falling into any trenches.</i> |
| Physical Cultural and Historical Resources | Damage to chance finds or cultural heritage | – The Contractor shall not damage archaeological sites, protected areas and cultural heritage. – If items of cultural or historical significance are unearthed or discovered, works must stop immediately, and the Supervision team must be informed. The Contractor will also notify the National Trust Department and other relevant agencies upon encountering any artefacts, remains or other notable objects immediately. – The Contractor shall follow the Chance Find Procedures and ensure that training is provided to all project workers on the Chance Find Procedures. – If human remains are unearthed, work must stop immediately and the Contractor must notify the Supervising Consultant who will inform the PIU. | | | | <i>GCC 19.1 is applicable to this section.</i> |

| Area | Potential Impacts / Issues | Mitigation Measures | Monitoring Requirements | Responsibility for Mitigation | Responsibility for Monitoring and Supervision | Comments / Relevant GCC |
|------|----------------------------|--|-------------------------|-------------------------------|---|-------------------------|
| | | <ul style="list-style-type: none">– The PIU will report the finding to the Police and the site will remain closed until an investigation is conducted and the all clear is given to resume work. | | | | |

6.3 Management Strategies and Implementation Plans (MSIPs)

The contractor will need to provide Management Strategies and Implementation Plans (MSIPs) to address key risks or impacts identified, some of which are outlined within the mitigative measures highlighted in table 6.2. These plans must offer comprehensive and concise details outlining means and methods to address the respective risk areas. Specific MSIPs are required for key ESHS risks due to the potential for impacts on the community and the hospital's operations. In addition to adhering to the mitigation measures in the table above, the Contractor will be required to prepare an MSIP for the following:

Traffic and Road Network Management: The access to the centre branches off the busy Vieux Fort to Castries Highway, as such the safety of commuters, residents, Wellness Centre staff, particularly ambulance operators, and the contractor's workforce on the narrow road is crucial. Proper traffic management procedures are essential to prevent vehicular and pedestrian conflicts and ensure road safety, particularly during transportation of construction materials and equipment and when construction activities take place at night.

7.0 Implementation Arrangements / Responsibilities

The MoHWEA PIU and the Contractor are the key entities responsible for implementation of the ESCoP.

Key responsibilities of the Supervising Consultant, MoHWEA PIU and the Contractor are as follows:

(a) MOHWEA & Project Implementation Unit (PIU) will be responsible for:

- Ultimately ensuring proper management of the environmental and social risks and impacts by ensuring that the Supervising Consultant is providing adequate oversight and reporting on ESHS issues.
- Engagement with project-affected peoples and other stakeholders.
- Evaluate the monitoring and supervision of project activities and ex-post evaluations.
- Publicising the Grievance Redress Mechanism and Grievance Redress Management.
- Systematically documenting evidence of its activities and outcomes and providing information to the World Bank team as needed.
- Informing promptly the WB if incidents or accidents occur.

(b) The Supervising Consultant (SC) will be responsible for:

- Addressing potential construction and operational ESHS risks.
- Final review of ESHS aspects of designs to ensure that they form a sound and comprehensive basis for addressing potential construction and operational ESHS.
- Preparation of ESHS Specifications for inclusion in the tender document and the subsequent works contract.
- Supervision of the contractor's compliance with contractual obligations.
- Reviewing and approving the Method Statements and MSIPs (collectively the C-ESMP), and requiring revisions and updates as needed.
- Ensuring that contractors are properly briefed in relation to the importance of ESHS matters during construction.
- Thereby ensuring that the requirements of this Environmental and Social Management Plan, including in relation to Health and Safety and the GRM requirements associated with the design and construction process are satisfactorily implemented.

(c) The Contractor

- The Contractor must assign a qualified, competent individual to serve as E&S Officer to be present on site as required and to ensure compliance with mitigation measures provided in the ESCoP and fulfill the corresponding conditions in the contract. Additionally, the Contractor must provide an Accident Prevention Officer or HS Manager as required by the GCC.
- Contractor is required to obey other national relevant legal regulations and laws.

Annex 1: ESHS Specifications for the Key Specific Risks.

The list of ESHS Specifications prepared for the Project is listed below.

ESHS Specification 1: Waste Management

ESHS Specification 2: Fuels and Hazardous Materials Management

ESHS Specification 3: Safety at Heights

ESHS Specification 4: Safety on Existing Roads

ESHS Specification 5: Site and Access Management

ESHS Specification 6: Stormwater Runoff Management

ESHS Specification 7: Working with Electrically Charged Equipment

ESHS Specification 8: Site Layout and Management

ESHS Specification 9: Occupational Health and Safety

ESHS Specification 1: Waste Management

| Project Activity/ Impact Source | Environmental Impacts | Typical Measures / Management Strategies |
|------------------------------------|---|---|
| General Waste | Soil and water pollution from the improper management of wastes and excess materials from the construction sites. | <p>The Contractor will:</p> <p>Adhere to good management practice as per GCC 18.2 for various specific waste streams (e.g., reusable waste, flammable waste, construction debris, food waste etc.) The Contractor shall abide by the provisions of the Waste Management Act of 2004, the Litter Act of 1983 and its amendments (1985 and 1993), and the Public Health Act of 1975 and its Regulations. and follow the guidelines of the St. Lucia Solid Waste Management Authority (SLSWMA³)</p> <p>Organize disposal of all wastes generated during construction in the designated disposal sites approved by the Project.</p> <p>Minimize the production of waste materials by using the 3Rs (Reduce, Recycle and Reuse) approach.</p> <p>Segregate and reuse or recycle all the wastes, wherever practical.</p> <p>Cover vehicles transporting solid waste with tarps or nets to prevent spilling waste along the route.</p> <p>Train and instruct all personnel in waste management practices and procedures as a component of the environmental induction process.</p> <p>Provide refuse containers at each worksite. Three (3) lidded containers will be positioned near the entrance to the site and clearly labelled for the collection of different types of wastes.</p> <p>One container will be illustrated and/or labelled to collect oily rags, filters, paints, chemicals etc., a second will be labelled 'wood', and the third 'all other forms of waste'.</p> <p>Personnel will pick up litter and sweep up working areas at the end of each shift, disposing of the wastes in the appropriate bin.</p> <p>Arrangements for each bin to be collected regularly (such that it is not overflowing at any time) for off-site disposal. 'All other wastes' shall be taken by registered carriers to the landfill site at Deglos.</p> <p>'Oily rags will be dried and disposed of at the approved site.</p> |

³ <https://www.slswma.org/wp-content/uploads/2020/03/Waste-Management-Plans-for-Developments-Rev-Sep2013.pdf>

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| | | <p>The Contractor will supply one refillable container suitable to hold 1.5 litres of drinking water to each worker, and supply a bulk/20 litre container of potable water from which workers can refill them.</p> <p>Where the option is available, the Contractor will request suppliers provide materials on a loose tip basis, to reduce the amount of waste generated at site.</p> <p>Request suppliers to minimize packaging where practicable.</p> <p>Place a high emphasis on good housekeeping practices and ensure that all areas are cleaned at the end of every work period to allow for the continued operations of the Hospital.</p> <p>Maintain all construction sites in a cleaner, tidy and safe condition and provide and maintain appropriate facilities as temporary storage of all wastes before transportation and final disposal.</p> <p>Potable water will be supplied in bulk containers to reduce the quantity of plastic waste (plastic bottles). Plastic bag use will be avoided.</p> |
| Hazardous and Biomedical waste Management | Health hazards and environmental impacts due to improper waste management practices | <p>The Contractor will:</p> <p>Store all chemical wastes in sealed containers, appropriately labelled for safe transport to an approved chemical waste depot in keeping with the National Bio Medical Waste Management Plan⁴</p> <p>Store, transport, and handle all chemicals, avoiding potential environmental pollution.</p> <p>Store all hazardous wastes appropriately in bunded areas.</p> <p>Make available Material Safety Data Sheets (MSDS) for hazardous materials on-site during construction.</p> <p>Collect hydrocarbon wastes, including lube oils, for safe transport off-site for reuse, recycling, treatment or disposal at approved locations in keeping with the guidelines provided by the SLSWMA</p> <p>Store, handle and dispose of biomedical waste in compliance with the National <i>Medical Waste and Other Bio-Hazardous Waste Management Plan</i>.</p> |

⁴ https://nemo.gov.lc/Portals/0/Documents/National_Plan/BioMedWasteManPlan.pdf?ver=2017-09-15-161118-000

ESHS Specification 2: Fuels and Hazardous Materials Management

| Project Activity/ Impact Source | Environmental Impacts | Typical Measures / Management Strategies |
|------------------------------------|---|--|
| Fuels and hazardous materials. | Materials used in construction have the potential to be a | Prepare spill control procedures and submit them for approval. Train the relevant construction personnel in the handling of fuels and spill control procedures. |

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| | <p>source of contamination. Improper storage and handling of fuels, lubricants, chemicals (pesticides) and hazardous goods/materials on-site and potential spills from these goods may harm the environment or the health of construction workers.</p> | <p>Store dangerous goods in banded areas on top of a sealed plastic sheet.</p> <p>Store and use fuels in accordance with material safety data sheets (MSDS). Make available MSDS for chemicals and dangerous goods on-site.</p> <p>Transport waste of dangerous goods, which cannot be recycled, to a designated disposal site.</p> <p>Provide absorbent and containment material (e.g., absorbent matting) where hazardous materials are used and stored, and ensure personnel are trained in their correct use.</p> <p>Make sure all containers, drums, and tanks that are used for storage are in good condition and are labelled with the expiry date. Any container, drum, or tank that is dented, cracked, or rusted might eventually leak. Check for leakage regularly to identify potential problems before they occur.</p> <p>Store and use fuels in accordance with material safety data sheets (MSDSs).</p> <p>Store all liquid fuels in fully banded storage containers with appropriate volumes, a roof, a collection point and an appropriate filling/decanting point.</p> <p>Store hazardous materials above flood level considered for construction purposes</p> <p>Put containers and drums in temporary storage in clearly marked areas where they will not be run over by vehicles or heavy machinery. The area shall slope or drain to an impermeable and safe collection area in the event of a spill.</p> <p>Take all precautionary measures when handling and storing pesticides, fuels and lubricants, avoiding environmental pollution.</p> <p>Avoid the use of materials with greater potential for contamination by substituting them with more environmentally friendly materials.</p> |
| Pesticide Management | | <p>Focus on careful selection of the type of pesticides and management of their use (timing, dose, mode of application etc) to reduce the environmental risks to acceptable levels;</p> <p>Allow only qualified, registered professionals to handle and apply pesticides;</p> <p>Ensure that pesticides selected and applied should be specific for the target pest;</p> |

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| | | <p>Purchase pesticide services from authorized dealers which are permitted under the country's regulations and WHO and PAHO recommended classification of pesticides by hazards;</p> <p>Create awareness among workers on aspects such as safe usage, handling and disposal of pesticides;</p> <p>Ensure that pesticides are stored in the original container with a legible label and according to label directions;</p> <p>Ensure that pesticides are not used just prior to pressure washing or activities that will result in water runoff.</p> <p>Provide safety equipment and PPE such as masks, gloves, coveralls and eye protection during the application of pesticides.</p> |
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ESHS Specification 3: Safety at Heights

| Project Activity/ Impact Source | Environmental Impacts | Typical Measures / Management Strategies |
|------------------------------------|-------------------------|--|
| Working at heights | Increased risk of falls | <p>Working at height remains one of the biggest causes of fatalities and major injuries on construction sites. Common cases include falls from roofs, ladders, and through fragile surfaces. 'Work at height' means work in any place where, if there were no precautions in place, a person could fall a distance liable to cause personal injury (for example a fall through a fragile roof down an unprotected lift shaft, stairwells).</p> <p>To reduce the inherent risks associated with working at heights the Contractor shall adopt the guidelines in the OECS Building Code⁵ and adhere to the following:</p> <p>LADDERS</p> <p>All ladders, when in use, shall be set up in a manner to be secure and to prevent slipping; and ladders, except stepladders or other self-supporting ladders, shall be securely fastened to a permanent support at the top, and if necessary, at the bottom, and braced to prevent swaying, bending or shaking.</p> <p>Ladders, leading to floors, stagings or platforms, shall extend at least three feet above the level of such floors, stagings or platforms.</p> <p>No single ladder shall exceed 6m (20 feet) in length. When greater heights are to be reached, intermediate platforms shall be erected. Ladder landings shall be at least 1.2m (4 feet) square and equipped with handrails and toe boards.</p> <p>Ladder rungs shall be spaced uniformly as near to 300mm (12 inches) as is practicable.</p> <p>When used temporarily, in place of stairways or runways, ladders serving traffic in both directions simultaneously shall be at least 1m wide. If separate ladders are provided for going up and coming down, they shall be marked "UP" and "DOWN" respectively at each floor and platform level.</p> |

⁵ <https://oece.int/en/our-work/knowledge/library/sustainable-energy/oece-building-codes?start=36>

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| | | <p>Ladders, other than sectional or extension ladders, shall not be extended by joining two or more together.</p> <p>SCAFFOLDS</p> <p>Properly constructed scaffolds shall be provided for all work which cannot be done safely by workmen standing on permanent or solid construction, except when such work can be done safely from ladders. All such scaffolds shall be substantially constructed, to support at least four times the maximum load and shall be secured to prevent swaying.</p> <p>Planks used in the construction of stationary scaffolds shall be not less than 50mm (2 inches) nominal thickness. Where such planks overlap at the ends, the overlap shall be not less than 150mm (6 inches).</p> <p>Planks shall be so placed that they cannot tip under the weight of the worker at any point. Nails used in the construction of scaffolds shall be of ample size and length to carry the loads they are intended to support, and all nails shall be driven full length. No nails shall be subject to direct pull.</p> <p>Ropes, cables and blocks used in the support of swinging scaffolds shall be of sufficient size and strength to sustain at least six times the maximum loads to which they will be subject. Where acids are likely to come into contact with them, ropes shall not be used in the support of scaffolds, but steel cables properly protected by grease or oil or other effective method shall be used instead.</p> <p>Every scaffold, the platform level of which is more than 1.8m (6 feet) above the ground or above a permanent or temporary floor, other than iron workers' scaffolds and carpenters' bracket scaffolds, shall be provided with guard rails and toe board extending the full length of the scaffold and along the ends except where ramps or runways connect with them, unless otherwise enclosed or guarded. On suspended, swinging and pole scaffolds, the space between guard rails and toe boards shall be fitted with wire mesh screens securely attached.</p> <p>Where objects are likely to fall on a scaffold from above, a substantial overhead protection shall be provided. Not more than 3m (10 feet) above the scaffold platform, and at doorways, passageways or other points where workers must pass under scaffolds, a substantial overhead protection shall be provided. No materials or equipment, other than required by the workers, shall be placed on scaffold platforms.</p> |
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| | | <p>Fit all fall protection equipment properly to the workers' bodies.</p> <p>Carry out a dynamic risk assessment prior to undertaking work at heights.</p> <p>Employees with medical conditions such as seizures or vertigo not allowed to work at heights as the condition may impair their ability to work safely.</p> |
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ESHS Specification 4: Safety on Existing Roads

| Project Activity/ Impact Source | Environmental Impacts | Typical Measures / Management Strategies |
|------------------------------------|--|---|
| Construction vehicular traffic | Increased use of the road by construction vehicles will affect the movement of normal road traffic and the road users' safety. | <p>The Contractor will:</p> <p>Prepare a Traffic Management Plan for approval by the Supervising Engineer.</p> <p>Follow all road traffic laws and regulations in keeping with the Motor Vehicles and Road Traffic Act of St. Lucia⁶.</p> <p>Use the existing roads and access routes for the operations that are approved by the Supervising Engineer.</p> <p>Keep such roads in a clean and safe condition and any damage reinstated on the day that it occurs and on completion of the Works as directed by the Supervising Engineer.</p> <p>Supply, erect, maintain, and remove on completion of the Works all road signs and warnings as necessary for the safety of all.</p> |

⁶ <https://attorneygeneralchambers.com/laws-of-saint-lucia/motor-vehicles-and-road-traffic-act>

ESHS Specification 5: Site and Access Management

| Project Activity / Impact Source | Impacts/Concerns | Typical Measures / Management Strategies |
|----------------------------------|----------------------------------|---|
| All construction activities | Unauthorised entry into the site | <p>Provide and erect one (1) suitable notice board as detailed by the Supervising Engineer not less than 2.4 meters wide by 1.2 meters high mounted on suitable posts at a location to be advised by the Supervising Engineer. Colours, text and size of lettering shall be to the approval of the Supervising Engineer. Each sign shall give the following information:</p> <ul style="list-style-type: none"> (a) Project Title (b) Name and logo of Employer (c) Name and contact information of Consultants / Supervising Engineer (d) Name and contact information of Contractor (e) Name and logo of Funding Agency <p>Place sign prominently so that it can be seen and read easily from each frontage of the parcel of land on where the building work is taking place.</p> <p>Do not erect any other notice boards or signs of any description unless directed or approved.</p> <p>Identify an employee who will have responsibility for controlling access of employees and other authorized personnel and authorized vehicles unto the site.</p> <p>Set out the site so that it supports good housekeeping such as designated delivery and storage areas, waste management, walkways and vehicle parking.</p> <p>Provide, furnish, equip, maintain and clean a site office as detailed for the use of the Supervising Engineer. The office(s) shall be ready for use and occupation within 7 days of the Date of Commencement of the Works and fully serviced within 14 days of that date.</p> |

ESHS Specification 6: Stormwater Runoff Management

| Project Activity / Impact Source | Impacts / Concerns | Typical Measures / Management Strategies |
|----------------------------------|---|--|
| Heavy Rainfall during the works | Damage to materials, equipment, and the works; and, runoff of sediment to sensitive marine environments . | <p>The contractor will:</p> <p>Implement appropriate measures for the site to ensure that stormwater runoff may leave the site without carrying pollutants, debris, or sediment.</p> <p>The following measures will be utilized:</p> <ul style="list-style-type: none"> - Site entrance cleaning: Clean tires and other equipment of site contamination before leaving the site. - On-going training: Keep employees educated on runoff, pollution, and the local ordinances to follow. - Use of silt fencing, sediment pits, haybales, screens or filters, to prevent the off-site transport of silt, sediment, debris, or pollutants to streets, drains, ditches, or canals. - |

ESHS Specification 7: Working with Electrically Charged Equipment

| Project Activity/ Impact Source | Impacts/Concerns | Typical Measures / Management Strategies |
|------------------------------------|---|--|
| Electrical works | Electrocution resulting in serious injury or death. | <p>A Safe Attitude towards Electricity may Save life and property.</p> <p>Advise LUCELEC of any anticipated dramatic increase in electricity consumption. Overloading the system may result in problems on the site and neighbouring communities.</p> <p>Do not tamper with any meters, as this can result in damage to property, and increase the risk of fatal injury to workers.</p> <p>If there is need to cut large trees near power lines, inform LUCELEC which will assist by lowering the lines so that the danger to life and property is reduced.</p> <p>Always dry hands before handling plugs or switches.</p> <p>Do not substitute the fuse in panels with ordinary wire or anything else. This can cause a fire and can even be deadly.</p> <p>Only proper plugs must be inserted into sockets. Avoid using loose wires.</p> <p>Do not break off an earth pin to fit a plug into a different socket.</p> <p>Do not clean equipment while they are still plugged in.</p> <p>Do not put electrical equipment off by pulling the cord out of the outlet. This will damage the equipment or could cause a fire.</p> <p>Know the wattage of all equipment. Never plug too many pieces of equipment into the same outlet, as this poses a serious fire risk. Two or three plugs is the maximum; have additional sockets fitted. Too many pieces of electrical equipment on the same circuit can lead to overloading which leads to</p> |

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| | | <p>overheating and may consequently lead to an electrical fire.</p> <p>Extension cords should be only for temporary use.</p> <p>Only use tools that are properly insulated and carry essential marks of safety and integrity compliance: British Standard Kitemark (BSI) the American Underwriters Limited mark (UL) or the European IEC approval on any electrical equipment.</p> <p>Do not drill holes into walls without ascertaining the location of buried electrical wires.</p> <p>Do not climb power poles and transmission towers.</p> <p>Keep ladders and scaffolds away from power lines.</p> <p>Perform a Risk Assessment to identify the hazards, the risks arising from those hazards, and the control measures you should use.</p> <p>Add a lock-out system to avoid anyone working with charged equipment unknowingly.</p> <p>Check that the electrical equipment is suitable for the work and way in which it is going to be used.</p> <p>Check that the electrical equipment is in good condition.</p> <p>Check that the equipment is suitable for the electrical supply with which it is going to be used, and the electrical supply is safe.</p> <p>It is often beneficial to use a Residual Current Device (RCD) between the electrical supply and the equipment.</p> <p>Make sure that the user of the equipment is trained to use it safely.</p> <p>Make sure the user knows which personal protective equipment to wear, how to use it, and make sure they do.</p> |
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ESHS Specification 8: Site Layout and Management

| Project Activity / Impact Source | Impact / Concerns | Typical Measures / Management Strategies |
|----------------------------------|---|---|
| All construction activities | Unsafe site conditions posing a risk to Employee health and safety. | <p>Provide hygienic and weatherproof meal and shelter facilities in an area accessible to the building under construction at the earliest opportunity.</p> <p>These facilities should include:</p> <ul style="list-style-type: none"> • adequate seating which could include a board across two trestles and other alternatives to chairs. • a clean surface upon which to place food. • a rubbish bin with a lid or appropriate alternatives for the hygienic disposal of food scraps <p>Provide access to conveniently located toilet facilities. For an acceptable standard of hygiene and privacy, the toilet must be:</p> <ul style="list-style-type: none"> • kept clean • well-lit and well ventilated, either naturally or artificially • provided with a hinged seat and lid • provided with a door which can be locked from inside • provided with a plentiful supply of toilet paper <p>Provide hand washing facilities within or adjacent to each toilet or urinal, and provide clean water and soap for the purposes of washing.</p> <p>The Contractor shall provide a constant supply at least 1.5 litres per person per day and a 5-gallon refill of clean potable water suitable for human consumption.</p> <p>Have available accessible consultation sheets for review in case of contingency or emergency situations. These should have</p> |

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| | | <p>phone numbers for police, fire-fighters, Red Cross, personal supervisor or project leader.</p> <p>Have a fire extinguisher available on site and employees trained to use the extinguisher.</p> |
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ESHS Specification 9: Occupational Health and Safety

| Project Activity / Impact Source | Impact / Concerns | Typical Measures / Management Strategies |
|----------------------------------|--|---|
| All construction activities | Work activities impacting the health and safety of workers | <p>The Contractor will have full regard for the safety of all persons entitled to be on the site and manage the site and works in an orderly manner appropriate to avoidance of dangers.</p> <p>The standards and guidelines regarding health and safety, namely the St. Lucia Labour Code, The Factories Regulations (Cap 106 of 1948), and Employees (Occupational Health and Safety) Act (No. 10 of 1985), as well as relevant sections of the OECS Building Code, will be adhered to.</p> <p>The Contractor will:</p> <p>Provide workers with PPE that comply with industry good practice. Provide protective clothing, safety boots, helmets, masks, gloves, and goggles, to the construction personnel, appropriate to the materials in use.⁷</p> <p>Designate a qualified senior member of the site staff to serve as Health and Safety Officer with the responsibility to ensure that all workforce health and safety matters are properly and fully addressed.</p> <p>Carry the requisite insurances.</p> |

⁷ The appropriate PPE needs to be identified and in place before starting work, used and maintained regularly, and its use and maintenance monitored;

- Eye and face protection for flying particles, molten metal, liquid chemicals, gases or vapours, light radiation: safety glasses with side-shields, protective shades.
- Head protection for falling objects, inadequate height clearance, and overhead power cords: plastic helmets with top and side impact protection.
- Hearing protection for noise: ear plugs or ear muffs.
- Foot protection for falling or rolling objects, pointed objects, corrosive or hot liquids: safety shoes and boots.
- Hand protection for hazardous materials, cuts or lacerations, vibrations, extreme temperatures: gloves made of rubber or synthetic materials (Neoprene), leather, steel, insulating materials.
- Respiratory protection for dust, fogs, fumes, mists, gases, smokes, vapours: facemasks with appropriate filters for dust removal and air purification.

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| | | <p>Provide adequate on-site first aid facilities with qualified first-aiders, together with evacuation plans/and procedures for seriously injured persons.</p> <p>Conduct regular health and safety training and convene regular health and safety meetings with workforce to emphasize safe work practices and expectations.⁸</p> <p>Engage persons who are skilled and qualified for the tasks to which they are assigned, in accordance with the other ESHS Specifications in this EScOP.</p> <p>Ensure that extinguishers and adequate water for firefighting are available at the entrance to the site.</p> <p>Ensure safety around excavations, pits, or trenches, by installing temporary barriers such as wire fencing, netting and road pins, chestnut paling fencing, or similar.</p> <p>Report accidents and incidents to the Supervising Engineer and Labour Department within 24 hours, and follow subsequent reporting and follow-up procedures as directed by the Supervising Engineer.</p> |
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⁸ As a minimum the Contractor will ensure that all workers participate in the general induction: General Induction for Construction Workers: Safety, Health and the Environment to be found here, <https://www.wbgkggtf.org/node/3823> shall be provided as training to all Contractor's Personnel. Each Contractor's Personnel shall receive the general induction prior to their start of any Works activity on site, and at least midway through the work period. Records of the general induction training provided shall be kept. The record shall include a copy of the induction given and as a minimum the following details: Name and signature (or mark) of trainee; Employer/ organization they work for; Date of induction training attended.

Annex 2: E&S Screening Checklist

St. Lucia Health System Strengthening Project

Screening Form for Potential Environmental and Social Risks

Richfond Wellness Centre Minor Rehabilitation Works

Objective

The purpose of the E&S screening is to assess the potential E&S risks of the proposed sub-project or activity, provide guidance on any national permitting requirements, determine if it is eligible under the project, and identify what types of E&S management instrument is needed.

In order to achieve the above, the screening process follows three stages:

- **Stage 1:** Identify whether the proposed activity or sub-project would require any national or local permitting. This provides an early indication of the potential E&S impacts of the project.
- **Stage 2:** Screen the sub-project against the **High Impact Criteria/Checklist**. The objective of this Checklist is to identify projects which would have highly significant and sensitive E&S impacts (which would raise the risk category to A as per WB OP and thereby require project restructuring).
- **Stage 3:** Screen the sub-project against **Criteria/Checklist 2– Detailed Impact Assessment Checklist**, to assess the level of significance of potential E&S impacts, and determine the E&S management instrument needed (ESIA, ESMP, ESCOPs, or none).

Scope of Works

The works are mainly minor rehabilitation works to include:

- (xv) Removal and disposal of old metal water tank
- (xvi) Repairing damaged rainwater guttering
- (xvii) Replacement of all waste water pipes
- (xviii) Installation of AC units in 2 treatment rooms
- (xix) Drainage of existing AC units
- (xx) Installation of wall fans in patient waiting area
- (xxi) Installing smoke detectors in all rooms (battery operated)
- (xxii) Installation of Didier cupboard in pharmacy
- (xxiii) Extend walls to ceiling / rafters for consultation room
- (xxiv) Fabrication of waiting benches

- (xxv) Relocate 20 ft storage container and covert into a storeroom and small office
- (xxvi) Application of 2” of external concrete to address water issue at entrance canopy
- (xxvii) Termite and rodent treatment
- (xxviii) Pressure washing of external concrete surfaces, water tanks and generators.

Stage 1. National Permitting Requirements

The sub-project or activity involves physical works. It may require approval from the Development Control Authority (DCA), either as design review or an EIA depending on the evaluation that DCA performs. Accordingly, the contractor with support from the PIU should confirm with DCA the permitting process and ensure that the activities will not be interrupted or halted due to lack of permit or approval.

Stage 2: High Impact Checklist (to identify projects with Category A impacts)

If any of the answers to the questions below is **Yes**, then the sub-project would have resulted in the project being classified as World Bank Category A. **Therefore, they will not be eligible for investment, since the project has been rated Category B.**

| Sub-project title: Richfond Wellness Centre – Minor Rehabilitation Works | |
|---|------------------------|
| Sub-project brief description: See above scope of works | |
| Question | Answer (Yes/No) |
| Will the project: | |
| 1. Cause sensitive (direct and or cumulative) impacts? Examples of Sensitive impacts are those, which may be irreversible, or those which raise issues related to natural habitats and or physical and cultural resources. | No |
| 2. Cause diverse (direct and or cumulative) impacts? Diverse impacts are those impacting different media (air quality, water quality, noise level, risk to the community) at the same time. | No |
| 3. Cause unprecedented impacts? Unprecedented impacts are those, which have not been experienced before in the project's area of influence (i.e. those which occur for the first time in the area) | No |
| 4. Have an area of influence that significantly exceeds its footprint? | No |

Conclusion: the proposed works or activities are consistent with E&S Risk Category B and are therefore eligible under the project.

Stage 3: Detailed Impact Assessment Checklist

For Eligible projects, apply the checklist below:

If the answer is YES to any of the questions, then the sub-project or activity should have an E&S management instrument to prevent or reduce any potential impacts. The E&S instrument should address each of the risks identified, in the level of detail commensurate with the risks (ESIA, ESMP, or ESCOP), according to WB OP 4.01.

If the answer is “No” to all questions, then the project would not have any potential E&S risks, and no management instrument would be required, according to WB OP 4.01.

| Question | | Answer (Yes/No) | Other categories affected |
|-----------|---|--------------------|------------------------------|
| | Water (quality and resources) | | |
| | | | |
| W1 | Is the sub-project adjacent to waterways? | No | |
| W2 | Will the sub-project generate solid waste? | Yes | |
| W3 | Will the sub-project generate liquid waste? | No | |
| W4 | Will the sub-project generate demolition waste? | No | |
| W5 | Will the sub-project generate hazardous waste(grease, oil, empty paint containers, etc..)? | Yes | Paints |
| W6 | Will the sub-project consume an amount of potable water higher than 3m ³ /site/day | No | |
| W7 | Will the project cause interruption to water flows? | No | |

| Question | | Answer Yes/No | Other Categories Affected |
|-----------|--|------------------|------------------------------|
| | | | |
| | Air (Quality and Noise level) | | |
| | | | |
| A1 | Will the sub-project use of chemicals, agrochemicals, corrosives, and solvents? | Yes | Pesticides |
| A2 | Will the sub-project use machinery? | Yes | |
| A3 | Will the sub-project involve refurbishment works (marble, concrete, ceramics, wood, etc.)? | Yes | |
| A4 | Will the sub-project activities generate volatile Organic Compounds VOCs (paints, asphalt heating, preparation and application, etc.)? | No | |
| A5 | Will the sub-project involve major and/or minor demolition works? | No | |
| A6 | Will the sub-project involve Asbestos management? | No | |
| A7 | Will the sub-project involve the installation of air conditioning units/systems? | Yes | |
| A8 | Will the sub-project involve waste burning? | No | |
| A9 | Will the sub-project involve Generation of odors? | No | |
| | Soil (quality and erosion) | | |
| | | | |
| S1 | Will the sub-project cause soil erosion? | No | |
| S2 | Will the sub-project cause topsoil loss? | No | |
| S3 | Will the sub-project involve soil compaction? | No | |
| S4 | Will the sub-project involve concrete foundations /impervious layers? | No | |
| S5 | Will the sub-project involve equipment on-site fueling? and storage? | No | |

| | | | |
|-------------|--|----|--|
| | | | |
| | Social impacts and community health & safety | | |
| | | | |
| CHS1 | Will the sub-project involve temporary labor influx (more than 20 workers)? | No | |
| CHS2 | Will the sub-project cause traffic impacts and accessibility issues? | No | |
| CHS3 | Could the sub-project cause utility damage? | No | |
| CHS4 | Will the sub-project affect physical integrity of weak structures/houses adjacent to construction sites? | No | |

| Occupational Health and Safety | | | |
|---------------------------------------|--|-----------------|---------------------------------|
| Question | | Answer (Yes/No) | Other categories affected |
| OHS1 | Will the sub-project involve potential physical hazards? | No | |
| OHS2 | Will the sub-project involve fire hazards? | No | |
| OHS3 | Will the sub-project involve slippage, falling & working at heights? | Yes | Ladders, work site housekeeping |
| OHS4 | Will the sub-project involve manual handling and lifting? | Yes | |
| OHS5 | Will the sub-project involve the risk of electrocution? | Yes | Electrical upgrades |
| OHS6 | Will the sub-project involve excavation works? | No | |
| | Biodiversity | | |
| BIO1 | Will the sub-project involve works in rivers, canals, or drains? | No | |
| BIO2 | Will the sub-project involve land disturbance or site clearance? | No | |
| | Physical Cultural Resources | | |
| CR1 | Is the sub-project located near a recognized PCR conservation area or heritage site? | No | |
| CR2 | Does the sub-project involve significant excavations and/or movement of earth? | No | |

Conclusions and Recommendations:

1. Proposed Environmental and Social Risk Ratings (High, Substantial, Moderate or Low). Provide Justifications.

The proposed E&S risk rating is **Moderate**. The proposed works will present minor E&S risks that are typical of small rehabilitation or renovation activities, as identified in the Stage 3 matrix (above). All can be minimized or avoided with standard E&S protocols.

2. Proposed E&S Management Plans / Instruments

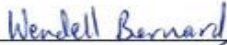
To ensure that the small-scale works are managed in accordance with best practice, a simple ESMP with ESCoPs for the key specific risks, will be created to describe the specific key requirements and working methods to be adopted by contractors performing the works.

Prepared by:



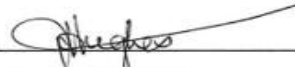
Project E&S Specialist

Reviewed by:



Project Manager / E&S Focal Point

Approved by:



Project Coordinator