

Saint Lucia
Windward Island Sector Transformation
For Learning Enhancement (P508559)

ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

Negotiated Version

May 29, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Saint Lucia (the Recipient) will implement the Windward Islands Sector Transformation For Learning Enhancement Project (the Project), with the involvement of the Ministry of Education, Sustainable Development, Innovation, Science, Technology and Vocational Training (MOE), as set out in the Grant Agreement. The International Development Association (the Bank), has agreed to provide financing for the Project, as set out in Grant Agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Grant Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient's Representative specified in the Grant Agreement or Minister of Ministry of Education, Sustainable Development, Innovation, Science, Technology and Vocational Training. The Borrower shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT³			
A	ORGANIZATIONAL STRUCTURE e. Establish and maintain a project Implementing Unit (PIU) with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including an environmental and social specialist. f. Enter arrangements with entities or agencies with which the Ministry of Education, Sustainable Development, Innovation, Science, Technology and Vocational Training needs to engage to manage E&S risks and impacts of the Project.	e. Establish a PIU and hire or appoint one environmental and social specialist within 90 days of the Effective Date. Thereafter maintain the PIU and this position throughout Project implementation and for the management of environmental and social risks in accordance with the Project Operations Manual (POM). Before entities or agencies begin implementing project work.	MOE/PIU
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement training for PIU staff, contractors, relevant government agencies, stakeholders, communities, Project workers on environmental and social project requirements and on other training and capacity development events as the need arises.	Training program to commence within six (6) months of the Project Effective Date. Throughout Project implementation.	MOE/PIU
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: <ul style="list-style-type: none"> Status of preparation and implementation of E&S documents required under the ESCP. Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. 	Semestral (every six months) reports to the Bank throughout Project implementation, commencing after the Project's Effective Date. Submit each report to the Bank no later than Thirty (30) days after the end of each reporting period.	MOE/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> E&S performance of contractors and subcontractors as reported through [monthly] contractors' and supervision firms' reports. Number and status of resolution of incidents and accidents reported under action E below. Other aspects that may arise as relevant. 		
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors/ firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.</p>	Submit the monthly reports to the Bank upon request.	MOE/PIU
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the [Bank/Association] upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	MOE/PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS Prepare and implement Environmental and Social (E&S) Risk Management Provisions for the Project, in accordance with the applicable national laws and with recommended gap-filling measures to ensure consistency with the relevant ESSs, as part of the Projects Operations Manual (POM).		MOE/PIU
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Prepare and submit the E&S Provisions for the Bank's prior review and clearance prior to the finalization of the POM and thereafter incorporate the E&S Provisions as part of the POM. Implement E&S Provisions throughout Project implementation.	
1.2	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S Provisions of the POM and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the ECS specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Bank upon request.	MOE/PIU
1.3	TECHNICAL ASSISTANCE Carry out the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are conducted in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout Project implementation.	MOE/PIU
1.4	USE OF RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK Use of Saint Lucia National Labor Framework: Ensure that the labor management and working conditions of Project workers are consistent with this ESCP and with the Saint Lucia national labor framework, which includes, inter alia, the country's relevant policy, legal and institutional framework, including its national, departmental, or local implementing institutions, and the applicable laws, regulations, procedures, and implementation capacity.	Throughout Project Implementation	MOE/PIU
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p>Additional Measures to be implemented to the national labor laws to achieve consistency with the ESS 2. To this end, the following measures must be implemented:</p> <p>g. Adopt and implement occupational health and safety (including personal protective equipment, and emergency preparedness and response) measures, considering the General Environmental, Health and Safety Guidelines (EHSGs), the industry-specific EHSGs and other Good International Industry Practice (GIIP), as relevant;</p> <p>h. Establish a Grievance mechanism to allow project workers' complaints to be addressed speedily and amicably. Maintain and operate a grievance mechanism (GM) for project workers to know about its existence and benefit from it without free or retaliation. Ensure that the GM has dedicated channels to address worker complaints, as well as specific channels for addressing Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints. The GRM structure would be described in the Project Operations manual (POM). The Government e-service portal to include an additional means for workers under the project to submit grievances</p> <p>i. Incorporate the relevant requirements above in the ESHS specifications of the procurement documents and contracts with third parties that engage workers in the implementation of the Project.</p>	<p>g. Throughout implementation of the Project in a timeframe as adopted in the POM.</p> <p>h. Throughout implementation of the Project in a timeframe as adopted in the POM.</p> <p>i. Throughout implementation of the Project in a timeframe as adopted in the POM.</p>	MOE/PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures, including, inter alia, waste management measures to manage hazardous and no-hazardous waste including electronic waste (e-waste), in the E&S Provisions of the POM, to be prepared under action 1.1 above, consistent with ESS3.</p>	Same timeframe as for the adoption and implementation of the POM.	MOE/PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers and response to emergency situations, and include mitigation measures in the E&S Provisions of the POM, to be prepared under action 1.1 above.</p>	Same timeframe as for the adoption and implementation of the POM.	MOE/PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
Not Currently Relevant			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
Not Currently Relevant			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not Currently Relevant			
ESS 8: CULTURAL HERITAGE			
Not Currently Relevant			
ESS 9: FINANCIAL INTERMEDIARIES			
Not Currently Relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Update and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Submit updated SEP for the Bank's review and no objection, and disclosure no later than 90 days after project effective date and thereafter adopt and implement the SEP throughout project implementation.	MOE/PIU
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism (GM), to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Establish the GM along with the SEP, no later than 90 days after the Effective Date, and thereafter maintain and operate the GM throughout Project implementation.	MOE/PIU
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness:			
A.a Establish of Project Implementation Unit (PIU) and engagement of Environmental and Social Specialist			
1.1 Approved Project Operations Manual (POM)			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
10.1 Updated Stakeholder Engagement Plan (SEP) 10.2 Establish and operationalize Project Grievance Redress Mechanism (GM)		