

Grenada

UNLEASHING THE BLUE ECONOMY OF THE CARIBBEAN PROGRAM (P171833)

DRAFT Environmental and Social Commitment Plan (ESCP)

3 December 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. **Grenada** (hereinafter the Recipient) will implement the “Unleashing the Blue Economy of the Caribbean” Project (the Project), through the Ministry of Finance, Planning, Economic Development & Physical Development. The International Development Association (hereinafter, the Association) has agreed to provide financing for the Project.
2. The Recipient, through the Ministry of Finance, Planning, Economic Development & Physical Development shall implement material measures and actions so that the Project is implemented in accordance with the World Bank’s Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents, or plans, as well as the timing for each of these.
3. The Recipient, through the Ministry of Finance, Planning, Economic Development & Physical Development, shall comply with the provisions of any other environmental and social (E&S) instruments required under the ESSs and referred to in this ESCP, including the Environmental and Social Management Framework (ESMF), Resettlement and Process Framework (RPF), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and site-specific E&S instruments, as well as the timelines specified in the present ESCP and the listed E&S instruments. The E&S instruments referenced in the ESCP may be updated with the prior written agreement of the Association.
4. The Recipient is responsible for ensuring compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1 above.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement.
6. As agreed by the Association and the Recipient, 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 an assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient shall agree to the changes with the Association and shall 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 the Ministry of Finance, Planning, Economic Development & Physical Development. The Recipient shall 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 Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

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

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain, as a part of the Project Implementation Unit (PIU), an organizational structure with qualified staff and resources to support, among others, the management of E&S risks.</p> <p>This shall include, at minimum, the following key E&S staff:</p> <ul style="list-style-type: none"> • One (1) Environmental Specialist • One (1) Social Specialist 	<p>Hire key staff no later than 90 days after the Project Effective Date.</p> <p>This organizational structure shall remain in place throughout Project implementation.</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical Development</p>
1.2	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Ensure that the Project is executed in accordance with the following requirements, and in a manner acceptable to the Association:</p> <p>a) Develop, consult, adopt, disclose and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs, and in a manner acceptable to the Association.</p> <p>b) Prepare, consult, adopt, disclose, and implement specific environmental and social impact assessments (ESIAs) and environmental and social management plans (ESMPs) and other plans as applicable for subprojects and other relevant Project activities, in accordance with the ESMF and in a manner acceptable to the Association.</p>	<p>a) Submit the final ESMF for the Association's no objection and adopt and disclose no later than sixty (60) days after the Project Effective Date, or before any project activity starts (whichever occurs first). It shall be implemented throughout Project implementation.</p> <p>b) The ESIAs/ESMPs shall be adopted upon WB's No objection and before launching the respective bidding processes. Implement ESMPs throughout the entire duration of the subproject or respective Project activity.</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical Development</p>

1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>a) Incorporate the relevant aspects of this ESCP, including, inter alia, the relevant requirements of the ESMF, Labor Management Procedures (LMP), ESIA/ESMPs, and codes of conduct, in the environmental, social, and health & safety specifications of the bidding and procurement documents and contracts with consulting firms, contractors, and supervision firms and in their respective contracts.</p> <p>b) Ensure that all consulting firms, contractors, and supervision firms comply with the environmental, social, and health & safety specifications as well as the codes of conduct of their respective contracts.</p>	<p>a) Prior to commencing the relevant bidding processes, and thereafter incorporate in the respective contracts.</p> <p>b) Throughout the implementation of each subproject or respective Project activity.</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical Development</p>
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that consultancies, studies, capacity-building activities, training and any other activity of technical assistance provided under the Project be carried out in accordance with Terms of Reference (TORs) which incorporate all ESSs relevant requirements, in a manner acceptable to the Bank.</p>	<p>Submit TORs for review and no objection of the Bank before launching the respective bidding process. This shall be carried out throughout the implementation of the Project.</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical Development</p>
1.5	<p>PERMITS, CONSENTS AND AUTHORIZATIONS</p> <p>Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant authorities. Comply or cause to comply, as appropriate, with the conditions established in these permits, consents, and authorizations.</p>	<p>As applicable, to be obtained prior to initiating activities that require permits, consents, and authorizations.</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical Development</p>
1.6	<p>CONTINGENT EMERGENCY RESPONSE</p> <p>a) Ensure that the Contingent Emergency Response Component (CERC) Manual includes a description of the ESHS assessment and management arrangements included in the Emergency Action Plan as established in the ESMF prepared for this Project.</p> <p>b) Prepare, consult, adopt, and disclose any E&S instrument which may be required for activities under Part 3 of the Project, in accordance with the CERC Manual, the ESMF, and the ESSs, and thereafter implement the measures and actions required under said instruments, within the timeframes specified in said instruments, all in manner acceptable to the Association.</p>	<p>a) The adoption of the CERC Manual, in form and substance acceptable to the Bank is a withdrawal condition, under [section] of the legal agreement for the Project.</p> <p>b) The E&S instruments shall be submitted for the Association's prior review and no objection, and thereafter adopted and disclosed before carrying out any activity under Part 3 of the Project that requires the preparation of these instruments. Once adopted, the instruments shall be implemented in accordance with their terms, in a manner acceptable to the Association, throughout the implementation</p>	<p>The entity/ministry/agency designated by Grenada, for Part 3 of the Project.</p>

		of activities under Part 3 of the Project.	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>a) Develop, consult, adopt and disclose Labor Management Procedures agreed during preparation, consistent with the relevant ESSs, and in a manner acceptable to the Association.</p> <p>b) Update as needed and implement the LMP.</p>	<p>a) The draft LMP shall be developed, consulted upon and, thereafter, revised, adopted and publicly disclosed within sixty (60) days following the effective date of the Project.</p> <p>b) Throughout Project implementation.</p>	PIU / Ministry of Finance, Planning, Economic Development & Physical Development
2.2	<p>GRIEVANCE REDRESS MECHANISM (GRM) FOR PROJECT WORKERS</p> <p>a) Establish, maintain, and operate a grievance mechanism for Project workers as described in the LMP and consistent with ESS2.</p> <p>b) Incorporate the requirements of the GRM for workers into the bidding documents and the corresponding contracts.</p>	<p>a) Establish the GRM before contracting workers under the Project and maintain it throughout Project implementation.</p> <p>b) Before starting bidding processes and thereafter incorporate in the respective contracts.</p>	PIU / Ministry of Finance, Planning, Economic Development & Physical Development
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>a) Develop and implement Occupational, Health and Safety Plans (OHSPs) as part of the development and implementation of site specific ESMPs, in accordance with relevant guidelines specified in the ESMF and LMP.</p> <p>b) Incorporate the OHS measures into bidding documents and contracts with consulting firms, contractors and supervision firms.</p> <p>c) Ensure that the OHS measures specified are implemented for each work site/activity.</p>	<p>a) Same timeframe than for action 1.2.b.</p> <p>b) Prior to commencing the corresponding bidding process of each works package and thereafter incorporate in the respective contracts.</p> <p>c) Throughout implementation of each individual subproject or respective Project activity.</p>	PIU / Ministry of Finance, Planning, Economic Development & Physical Development
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE</p> <p>Develop and implement Emergency Response Plan (ERP) as part of the site-specific ESMPs, in accordance with the guidelines specified in the ESMF. Ensure workers and contractors are trained to implement the ERP.</p>	Same timeframe than for action 1.2.b.	PIU / Ministry of Finance, Planning, Economic Development & Physical Development

2.5	CODE OF CONDUCT Establish provisions in the bidding documents with consulting firms, contractors and supervision firms to include a Code of Conduct to be signed by all workers, including subcontractors. The Code of Conduct must be based on the format contained in the LMP and should address, among other issues, the risk of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) in the workplace.	Before launching the bidding process.	PIU / Ministry of Finance, Planning, Economic Development & Physical Development
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT Develop and implement a waste management plan (WMP) as part of the site-specific ESIA's and ESMPs, in accordance with the guidelines specified in the ESMF	Same timeframe than for action 1.2. b	PIU / Ministry of Finance, Planning, Economic Development & Physical Development
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1.	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, site preparation and rehabilitation, management of traffic disruptions during construction works, prevention of COVID-19 and response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF, and in a manner acceptable to the Association.	Same timeframe than for action 1.2.b	PIU / Ministry of Finance, Planning, Economic Development & Physical Development
4.2.	SEXUAL EXPLOITATION AND ABUSE (SEA) AND SEXUAL HARASSMENT (SH) Implement sexual abuse and exploitation and sexual harassment (SEA/SH) prevention and response measures, proportionate to the risks of the Project, including availability of a list of services for victims of SEA/SH in the areas of intervention, adoption of the code of conduct by all workers, and adequate treatment of SEA/SH grievances in the Project level GRM, as reflected in the SEP and LMP. These measures shall also be included in site-specific ESMPs.	Throughout Project implementation	PIU / Ministry of Finance, Planning, Economic Development & Physical Development
4.3	UNIVERSAL ACCESS Where technically and financially feasible, civil work designs shall incorporate the concept of universal access as described in the ESMF, including during restoration/replacement of ramps, elevators, and toilets for persons with disabilities.	Same timeframe than for action 1.2. b	PIU / Ministry of Finance, Planning, Economic Development & Physical Development
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

5.1	<p>RESETTLEMENT PLANS</p> <p>a) Prepare, consult, adopt, disclose and implement a consolidated Resettlement Policy Framework and Process Framework (RPF) consistent with ESS5, in a manner acceptable to the Association.</p> <p>b) When warranted, prepare, consult, disclose, adopt, and implement resettlement action plans (RAPs) for each subproject or activity under the Project for which the Resettlement and Process Framework (RPF) requires such RAP, in accordance with ESS5, and thereafter adopt and implement the respective RAPs, in a manner acceptable to the Association.</p>	<p>a) The RPF shall be developed, consulted, submitted to the Association for no-objection, adopted, and disclosed no later than sixty (60) days after the Project Effective Date.</p> <p>b) Actions Plans shall be submitted for the Association’s no objection, and, thereafter adopted and, implemented prior to commencing the subproject o respective Project activities that involve impacts covered under ESS5.</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical Development</p>
5.2.	<p>WILLING SELLER / WILLING BUYER TRANSACTIONS</p> <p>Provide evidence if “willing buyer-willing seller” transactions are contemplated, to demonstrate that the sale-purchase of land for the implementation of civil works was voluntary and informed, in which the seller had a real opportunity to keep the land and refuse to sell it, without coercion or fear of reprisals, and that the negotiations were based on market prices and will not have any adverse effects on third parties, in accordance with ESS5.</p>	<p>Submit the evidence to the Association prior to the transaction.</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical Development</p>
5.3.	<p>LAND DONATIONS</p> <p>Provide evidence for any land donations for investments, in accordance with ESS5, on: a) potential donors have been adequately informed and consulted regarding the Project and the options available to them; b) potential donors are aware that refusal is an option and they have confirmed in writing their willingness to proceed with the donation; c) the amount of land being donated is small and will not reduce the remaining surface area of land of the donor below the necessary amount to maintain their current livelihood levels; d) no relocation of homes is involved; e) it is expected that the donor will benefit directly from the Project, f) for community or collectively owned land, the donation can take place only with the agreement of the individuals who use or occupy the land, g) there exist alternative areas for installation/construction of project infrastructure; and h) besides the legal owner, the occupants or users that will be physically or economically displaced have been consulted and their impacts compensated in accordance with ESS5.</p>	<p>Submit the evidence to the Association prior to the transaction.</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical Development</p>
5.4	<p>GRIEVANCE MECHANISM</p> <p>Implement the GRM included in the SEP and RPF and integrate it into each RAPs, as warranted. A separate log for claims and complaints related to ESS5 shall be maintained.</p>	<p>Throughout implementation of each RAP</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical</p>

			Development
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Include in the ESIA and ESMPs, as needed, measures to manage the potential risks and impacts to biodiversity, in accordance with the ESMF and ESS.	Same timeframe as for action 1.2. b	PIU / Ministry of Finance, Planning, Economic Development & Physical Development
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
ESS 7 is not currently relevant.			
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS Develop, adopt, and implement a chance finds procedure as part of each ESMP and in line with the ESMF prepared for the Project	Incorporate chance-find procedures into the ESMPs to be prepared under Action 1.2b. above, as required under the ESMF.	PIU / Ministry of Finance, Planning, Economic Development & Physical Development
8.2	CULTURAL HERITAGE As part of site-specific ESMPs, carry out screening/assessment of tangible and intangible cultural heritage present in areas which may be affected by Project activities in accordance with requirements specified in the ESMF. If the need for a Cultural Heritage Management Plan (CHMP) is identified, develop, adopt and implement such CHMP, in accordance with the requirements of ESS8.	Same timeframe than for action 1.2. b	PIU / Ministry of Finance, Planning, Economic Development & Physical Development
ESS 9: FINANCIAL INTERMEDIARIES			
ESS 9 is not currently relevant.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN a) Develop, consult, adopt and disclose a Stakeholder Engagement Plan (SEP) and implement it thereafter, consistent with the relevant ESSs, and in a manner acceptable to the Association b) Report on the implementation of the SEP.	a) Submit the final SEP for the Association's no objection and adopt and disclose no later than sixty (60) days after the Project Effective Date, or before any project activity starts (whichever occurs first). It shall be implemented throughout Project implementation. a) Six-monthly reporting as set out in action A above.	PIU / Ministry of Finance, Planning, Economic Development & Physical Development

10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>a) Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously and those related to SEA/SH, in a manner consistent with ESS10.</p> <p>a) Report on project-level GRM implementation.</p>	<p>a) Establish the grievance mechanism, prior implementation of project activities and thereafter maintain and operate the mechanism throughout Project implementation</p> <p>b) Report on GRM as part of the six-monthly reports required under action A above.</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical Development</p>
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training to be provided to PIU staff on:</p> <ul style="list-style-type: none"> ▪ ESF requirements ▪ Stakeholder engagement and GRM ▪ SEA/SH ▪ Occupational health and safety including emergency preparedness and response 	<p>Within 90 days after action 1.1. has been completed.</p> <p>Training will continue throughout Project implementation.</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical Development (with technical support of the Association)</p>
CS2	<p>Training to be provided to Project contractors/workers on:</p> <ul style="list-style-type: none"> ▪ Environmental and social requirements including E&S documents ▪ Waste management ▪ Occupation Health and safety for the workforce including emergency preparedness and response ▪ Infectious Disease Prevention and Response ▪ Community health and safety ▪ SEA/SH ▪ Stakeholder engagement and GRM 	<p>Prior to the start of activities.</p>	<p>PIU / Ministry of Finance, Planning, Economic Development & Physical Development</p>