

GRENADA
Resilient Improvement Project (GRIP)
(P175720)

**Ministry of Infrastructure Development,
Transport and Implementation (MOIID)**

**ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

Draft
February 4, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Grenada, through the Ministry of Infrastructure Development, Transport and Implementation (MOIID), will implement the Grenada Resilient Improvement Project (GRIP). The Ministry of Infrastructure will closely collaborate with other relevant ministries, departments and Statutory Bodies critical to the components of the project. The International Development Association (hereinafter the **Bank**) has agreed to provide financing for the Project, including technical support relevant to the Bank's Environmental and Social Framework.
2. Grenada will implement material measures and actions so that the Project is implemented in accordance with the 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. Grenada will also comply with the provisions of any other environmental and social (E&S) documents required under the ESSs and referred to in this ESCP, such as the Environmental and Social Impact Assessment (**ESIA**), Environmental and Social Management Plans (**ESMPs**), Stakeholder Engagement Plan (**SEP**), Labor Management Procedures (**LMP**), and other E&S provisions and plans consistent with ESIA and ESMPs, and the timelines specified in those E&S documents.
4. Grenada is responsible for 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 one above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by the government as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and Grenada, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, MOIID, on behalf of Grenada, will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and Grenada (through its authorized representative under the legal agreement), will promptly disclose the updated ESCP.
7. Where there are Project changes, unforeseen circumstances, or Project performance results in changes to the risks and impacts during Project implementation, Grenada shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, safety, labor, gender-based violence, land acquisition, biodiversity or habitats, cultural heritage and stakeholder engagement.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank 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, occurrence of incidents and accidents, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Bi-Annual Reports will be submitted to the Bank on the implementation of the ESCP.</p> <p>Reports to be sent within the first 45 days after the end of each reporting period.</p> <p>Mid-term and completion reports will also be submitted, as required by the Bank, during Project implementation.</p>	MOIID
B	<p>INCIDENTS AND ACCIDENTS</p> <p>The government will promptly notify the Bank 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 injuries, excessive noise and dust pollution, disruptions to social and economic activities as a result of traffic delays, improper waste disposal..</p> <p>Provide sufficient detail of the accident or incident indicating immediate measures taken or that are planned to be taken to address an accident or incident, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>The Bank will be notified within 48 hours of the government/Ministry of Infrastructure learning of the incident or accident. Following such notification, the formal submission of the report of the incident or accident would be provided to the Bank in a timeframe acceptable to the Bank and or as requested.</p>	MOIID
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Require contractors to provide monthly monitoring reports to PIU.</p> <p>Monthly monitoring reports will include updates on environmental, social, health and safety (ESHS) of the construction sites, implementation of the ESMP, SEP and the GM. Monthly reports will be submitted to the Bank by MOIID upon request.</p>	<p>Monthly reports submitted to the PIU.</p> <p>Reports could be collated into quarterly reports for the Bank. Report submitted to the Bank upon request.</p>	MOIID

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>A project management structure or structure specifically designed to support the Project will be established at MOIID, which will include, <i>inter alia</i>, one (1) qualified Environmental Specialist and one (1) qualified social specialist, with qualifications and experience satisfactory to the Bank, and thereafter maintained throughout Project implementation.</p> <p>Adequate resources will be allocated to support management of ESHS risks of the Project inclusive of the implementation of the Stakeholder Engagement Plan (SEP) and the Grievance Mechanism (GM), the Labor Management Plan (LMP) and its GM and for training of contractors, project staff and the MOIID's staff in the E&S requirements.</p>	<p>The Environmental and Social Specialists will be designated within 60 days of the Effectiveness Date.</p> <p>The organizational structure as set out in this ESCP will function and be maintained throughout Project implementation.</p>	MOIID
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT (ESA), MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Assess the environmental and social risks and impacts of proposed Project activities for the physical works component of the project in a manner acceptable to the Bank.</p> <p>a) Finalize the draft Terms of Reference (ToRs) prepared prior to Appraisal for undertaking the Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs)</p> <p>b) Prepare, consult, adopt, disclose, and implement the 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 ESS's and in a manner acceptable to the Bank.</p>	<p>a) ToRs to be updated prior to undertaking the ESIA</p> <p>b) The ESIAs and 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>	MOIID
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, the site-specific ESMPs, pertinent aspects of the SEP and the LMP into ESHS specifications of the bidding documents for Contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p> <p>Require Contractors to prepare, adopt and implement a Contractors Construction Environmental and Social Management Plan (CESMP), detailing the methods to comply with the Project E&S instruments. Review and approve Contractors CESMP, and any other Contractor plans.</p>	<p>During the preparation of the bidding documents.</p> <p>Supervise Contractors' E&S performance throughout Project implementation.</p>	MOIID

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>CONTINGENT EMERGENCY RESPONSE</p> <p>a) Ensure that the contingent emergency response (CER) Manual includes a description of the E&S assessment and management arrangements and requirements in a manner consistent with the ESSs, including the preparation of any required environmental and social instruments for the activities to be carried under the Contingent Emergency Response component of the Project (Component 3).</p> <p>b) Prepare, adopt and disclose all the E&S instruments that may be required for activities under Component 3 of the Project in accordance with the CERC Manual and the ESSs, and thereafter implement the measures and actions required under said instruments, within the timeframes specified in said instruments, all in a manner acceptable to the Bank.</p>	<p>A CERC Environmental and Social Management Framework (ESMF) will be developed within sixty (60) days of project effectiveness.</p> <p>a) The adoption of the CERC Manual in form, substance and manner acceptable to the Bank is a withdrawal condition under the applicable Section and or Schedule of the legal agreement for the Project (section/schedule to be included).</p> <p>b) The E&S instruments will be submitted for the Bank's review and approval, and thereafter adopted before the carrying out of any activity under Component 3 of the Project that requires the preparation of these instruments. Once adopted, these instruments will be implemented in accordance with their terms, in a manner acceptable to the Bank throughout implementation of activities under Component 3.</p>	<p>MOIID or other ministry, agency or entity designated by the government for the Contingent Emergency Response component of the Project (Component 3) in accordance with the CERC Manual, with prior No Objection from the Bank.</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare, consult, update, adopt, and implement the LMP including, inter alia, occupational, health and safety (OHS) measures that have been developed for the Project, in a manner acceptable to the Bank.</p>	<p>LMP to be updated within 60 days of project effectiveness and implemented throughout project implementation.</p>	<p>MOIID</p>
2.2	<p>GRIEVANCE MECHANISM 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 GM for workers into the bidding documents and the corresponding contracts.</p>	<p>a) Grievance mechanism operational prior to the engagement of Project workers and maintained and monitored throughout Project implementation.</p> <p>b) Before starting bidding processes and thereafter incorporate into the respective contracts.</p>	<p>MOIID</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Develop and implement OHS measures as part of the development and implementation of the site specific ESMP in a manner acceptable to the Bank.</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 as for the preparation and implementation of the ESMPs, under action 1.2.</p> <p>b) Prior to commencing the corresponding bidding process of each works and thereafter incorporate in the respective contracts.</p> <p>c) Throughout implementation of each individual subproject or respective Project activity.</p>	MOIID
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE</p> <p>Develop and implement Emergency Response Plan (ERP) as part of the site-specific ESMPs. Ensure workers and contractors are trained to implement the ERP.</p>	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MOIID
2.5	<p>CODE OF CONDUCT</p> <p>Establish provisions in the bidding documents to include a Code of Conduct to be signed by all workers, including contractors and 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.</p>	<p>Before launching the bidding process.</p> <p>Code of conduct must be adhered to throughout Project implementation.</p>	MOIID
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT POLLUTION MANAGEMENT AND MATERIALS MANAGEMENT</p> <p>Develop and implement waste management measures, as part of the ESMPs.</p> <p>Require the Contractor to prepare Erosion and Sediment Control Plan (ESCP), Pollution Prevention and Control Plan (PPCP), Waste Minimization and Management Plan (WMMP) and Spill Management Plan (SMP) as part of the CESMP to comply with the ESMP.</p>	<p>Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.</p> <p>Supervise the CESMP throughout Project Implementation.</p>	MOIID
ESS 4: COMMUNITY HEALTH AND SAFETY			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Develop and implement Traffic and Road Safety Management measures to assess and manage traffic and road safety risks to motorists and the community in the ESMPs to be developed under action 1.2 above.</p> <p>Require the Contractor to prepare a Traffic and Road Safety Management Plan as part of the CESMP.</p>	<p>Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.</p> <p>Implement the Traffic and Road Safety Management Plan throughout Project Implementation.</p> <p>Supervise the CESMP throughout Project Implementation.</p>	MOIID
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Prepare, adopt, and implement Community Health and Safety measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including in relation to behavior of Project workers and any risks of labor influx in the ESMPs to be developed under action 1.2 above.</p> <p>Require the Contractor to prepare Community Health and Safety Plan (CHSP) as part of the CESMP to comply with the ESMP.</p>	<p>Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.</p> <p>Implement the CHSP throughout Project Implementation.</p> <p>Supervise the CESMP throughout Project Implementation.</p>	MOIID
4.3	<p>EMERGENCY MANAGEMENT</p> <p>Develop, adopt, and implement emergency preparedness and response measures in the ESMPs under action 1.2 above. It must cover emergencies such as fires or explosion or communicable diseases prevention such as COVID-19.</p> <p>Require the Contractor to prepare an Emergency Response Plan (ERP) as part of the CESMP to comply with the ESMP.</p>	<p>Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.</p> <p>Implement the ERP throughout Project Implementation.</p> <p>Supervise the CESMP throughout Project Implementation.</p>	MOIID
4.4	<p>SEXUAL EXPLOITATION AND ABUSE (SEA) AND SEXUAL HARASSMENT (SH)</p> <p>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.</p>	Throughout Project implementation	MOIID

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.5	<p>UNIVERSAL ACCESS</p> <p>Civil work designs and designs developed through Technical Assistance under the Project shall incorporate the concept of universal access.</p>	To be incorporated prior to the commencement of construction activities	MOIID
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT ACTION PLANS</p> <p>Prepare and implement Resettlement Action Plans (RAPs) to minimize land acquisition, restrictions on land use, involuntary resettlement or relocation (where avoidance is not possible) and to avoid or minimize economic displacement where possible. RAPs must contain measures to provide compensation, relocation assistance where required and GM for individuals, households and businesses affected by the project.</p>	RAPs should be submitted for the Bank's approval and shall be fully implemented (including the full payment of compensation at replacement cost and provision of resettlement assistance) prior to any displacement and the commencing of any Project activities that involve land acquisition and resettlement.	MOIID
5.2	<p>GRIEVANCE MECHANISM</p> <p>Prepare, adopt and implement the arrangements for the grievance mechanism to address re-settlement complaints as described in the RAPs and SEP.</p>	Same timeframe as 5.1	MOIID
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY MANAGEMENT</p> <p>Develop, adopt and implement measures to manage the potential risks and impacts to biodiversity as detailed in the ESMPs of the subprojects.</p> <p>Require the Contractor to prepare detailed methodologies in the CESMP to comply with the biodiversity management procedures</p>	<p>Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.</p> <p>Implement the ESMPs throughout Project Implementation.</p> <p>Supervise the CESMP throughout Project Implementation.</p>	MOIID
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not relevant for the Project.			
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
8.1	<p>CHANCE FINDS</p> <p>Develop, adopt, and implement the chance finds procedure (CFP) described in the ESMPs for the subprojects.</p> <p>Require the Contractor to prepare detailed methodologies in the CESMP to comply with the chance find procedures.</p>	<p>Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.</p> <p>Implement the ESMPs throughout Project Implementation.</p> <p>Supervise the CESMP throughout Project Implementation.</p>	MOIID
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant for the Project.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare, consult, adopt, disclose, update (as needed) and implement Stakeholder Engagement Plan (SEP) consistent with the relevant ESSs, in a manner acceptable to the Bank, to establish measures to allow for a continuous engagement and adequate communication strategies with all relevant stakeholders, including virtual consultations, throughout Project implementation.</p>	<p>A draft SEP was prepared, consulted, approved by the Bank and disclosed prior to appraisal. Submit the final SEP, incorporating and taking into account stakeholders' feedback, for the Bank's no objection and adopt and disclose no later than sixty (60) days after the Project Effective Date. The SEP shall be implemented throughout Project implementation</p>	MOIID
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>a) An accessible grievance mechanism shall be established, publicized, maintained, and operated 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.</p> <p>b) The grievance mechanism shall also receive, register, and address concerns and grievances related to sexual exploitation and abuse, sexual harassment in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers.</p> <p>c) Report on project-level GM implementation.</p>	<p>a) and b) Establish the grievance mechanism, prior to the implementation of project activities and thereafter maintain and operate the mechanism throughout Project implementation</p> <p>c) Report on GM as part of the six-monthly reports required under action a) and b) above.</p>	MOIID
CAPACITY SUPPORT (TRAINING)			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CS1	<p>TRAINING</p> <p>Training to be provided to PIU staff on:</p> <ul style="list-style-type: none"> ▪ ESF requirements ▪ Stakeholder engagement and GRM ▪ SEA/SH risk management ▪ Occupational health and safety including emergency preparedness and response 	<p>Within 90 days after the completion of action 1.1.</p> <p>Training will continue throughout Project implementation.</p>	MOIID
CS2	<p>Training to be provided to Project contractors/workers on:</p> <ul style="list-style-type: none"> ▪ Environmental and social requirements including ESHS requirements ▪ 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 risk management ▪ Stakeholder engagement and GM ▪ Preparation and implementation of the CESMPs 	<p>Prior to the start of works.</p>	MOIID