

**SAINT LUCIA**

**DATA FOR DECISION MAKING**

**[Draft]**

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

**November 1, 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Saint Lucia shall implement the OECS Data for Decision Making Project (the **Project**), with the involvement of its Ministry for Finance, Economic Development and the Youth Economy. The International Development Association (hereinafter referred to as the Association), has agreed to provide financing for the Project.
2. Saint Lucia shall implement material measures and actions so that the Project is implemented in accordance with the approved 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. Saint Lucia shall also comply with the provisions of any other Environmental and Social (E&S) instruments required under the ESSs and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Social Assessment (SA), Environmental and Social Management Plans (ESMPs), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and the timelines specified in those E&S documents.
4. Saint Lucia is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by Saint Lucia as required by the ESCP and the conditions of the Financing Agreement.
6. As agreed by the Association and Saint Lucia, this ESCP may be revised as necessary during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, Saint Lucia, through the Ministry for Finance, Economic Development and the Youth Economy shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP be documented through the exchange of letters signed between the Association and the Ministry for Finance, Economic Development and the Youth Economy, which 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, Saint Lucia 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
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Submitted to the Association semiannually during the implementation of the Project no later than 45 days after the end of each reporting period.</p> <p>The first report must be presented 6 months after the Project's Effective Date.</p>	Ministry for Finance, Economic Development and the Youth Economy
B	<p><b>INCIDENTS AND ACCIDENTS</b></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, including inappropriate disposal of hazardous wastes, construction accidents that result in death, serious or multiple injury, events of acute pollution due to air or noise emissions, cases of sexual exploitation and abuse, or sexual harassment. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association of any incident or accident within 48 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within the timeframe established by the Association following the initial notification.</p>	Ministry for Finance, Economic Development and the Youth Economy
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>Require contractors, including any supervising entities and consultants, to provide monthly reports on environmental, social, health and safety aspects to Ministry for Finance, Economic Development and the Youth Economy. Such monthly reports shall be submitted by Ministry for Finance, Economic Development and the Youth Economy to the Association, upon request.</p>	<p>Monthly reports submitted to the Association upon request.</p>	Ministry for Finance, Economic Development and the Youth Economy
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish an organizational structure within the Project Coordinating Unit (PCU) of Ministry for Finance, Economic Development and the Youth Economy with qualified staff to support the management of ESHS risks of the Project. This shall include, as a minimum (to be evaluated and adjusted during Project implementation, in consultation with the Association): An environmental and social specialist with qualifications and experience acceptable to the Association.</p>	<p>The environmental and social specialist shall be contracted or appointed, no later than 30 days after the Financing Agreement's Effective Date. It must be maintained throughout the implementation of the Project.</p>	Ministry for Finance, Economic Development and the Youth Economy

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK (ESMF)</b> Update, consult, finalize, adopt, disclose and implement a project level Environmental and Social Management Framework (ESMF) which shall include a Screening Tool and an Environmental and Social Assessment (ESA).</p>	<p>The ESMF shall be finalized, adopted and disclosed, in a manner acceptable to the Association no later than 30 days after the Financing Agreement's Effective Date. The ESMF shall be implemented throughout Project implementation.</p>	<p>Ministry for Finance, Economic Development and the Youth Economy</p>
<p>1.3 <b>ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS</b> Screen any proposed Project activities (at country level) in accordance with the ESMF prepared for the Project, and, thereafter, prepare, adopt, disclose and implement country-specific Environmental and Social Management Plans (ESMPs), as applicable.</p> <p>Any activities that would fall within the exclusion/ineligibility criteria of the ESMF shall not be supported. The exclusion criteria in ESMF includes, inter alia, Project activities that would involve permanent or temporary physical and economic displacement resulting from land acquisition or restrictions as specified under ESS5.</p>	<p>The ESMPs shall be prepared and submitted for the Association's review and no objection, and thereafter adopted and disclosed prior to launching the procurement process for the respective civil works and shall be implemented throughout the execution of said works. The ESMPs shall be included in the contracts with contractors.</p>	<p>Ministry for Finance, Economic Development and the Youth Economy</p>
<p>1.4 <b>SOCIAL ASSESSMENT</b> Update, consult, finalize, adopt, disclose and implement a Social Assessment for the Project.</p>	<p>The Social Assessment shall be adopted and disclosed, in a manner acceptable to the Association no later than 30 days after the Financing Agreement's Effective Date.</p>	<p>Ministry for Finance, Economic Development and the Youth Economy</p>
<p>1.5 <b>MANAGEMENT OF CONTRACTORS</b> Ensure that all contractors have the necessary capacity to comply with the corresponding ESMPs and the Project's Labor Management Procedures, other E&amp;S instruments and/or plans, and Code of Conduct throughout their contract. This includes:</p> <ul style="list-style-type: none"> <li>• Ensuring that the procurement documents include the necessary technical specifications for the adequate handling of issues contained in the ESMPs and Labor Management Procedures.</li> <li>• Ensuring that contractors have the necessary staff and capacity during the execution of the works to comply with said instruments.</li> </ul>	<p>Throughout Project implementation of the, including:</p> <ul style="list-style-type: none"> <li>• Prior to the preparation of procurement documents.</li> <li>• Before mobilization of each contractor, and maintained throughout the construction period.</li> </ul>	<p>Ministry for Finance, Economic Development and the Youth Economy</p>
<p><b>ESS 2: LABOR AND WORKING CONDITIONS</b></p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Update, adopt, and implement the Labor Management Procedures (LMP) including, inter alia, occupational, health and safety (OHS) measures that have been developed for the Project.</p>	<p>The LMP shall be adopted, in a manner acceptable to the Association, no later than 30 days after the Financing Agreement's Effective Date.</p> <p>The LMP shall be implemented throughout Project implementation.</p>	Ministry for Finance, Economic Development and the Youth Economy
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Grievance mechanism shall be operational prior to engaging Project workers and maintained throughout Project implementation.	Ministry for Finance, Economic Development and the Youth Economy
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>Prepare, adopt, and implement a Occupational Health and Safety Plan as part of the country specific ESMPs to be prepared, in line with the OSHP included in the ESMF and in compliance with the ESMF for the Project, and in line with the WBG EHS Guidelines and ESS2 to ensure the health and safety of workers during project activities. This OHS Plan shall also include measures related to prevention of COVID-19.</p>	Same timeframe as action 1.2 and 1.3 2 above.	Ministry for Finance, Economic Development and the Youth Economy
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN:</b></p> <p>Prepare, adopt, and implement a Waste Management Plan as part of the ESMF for the Project, which shall include measures to, inter alia, manage hazardous and non-hazardous wastes and e-wastes. These measures shall be included, as relevant, in the ESMP to be prepared in accordance with the ESMF.</p>	Same timeframe as actions 1.2 and 1.3 above.	Ministry for Finance, Economic Development and the Youth Economy
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b></p> <p>Resource efficiency and pollution prevention and management measures shall be covered under the respective ESMF, ESAs and/or ESMPs as necessary.</p>	Same timeframe as action 1.3 above.	Ministry for Finance, Economic Development and the Youth Economy
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <p>Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including, site preparation, retrofitting and rehabilitation works, and include these measures in the ESMPs.</p>	Same timeframe as action 1.3 above.	Ministry for Finance, Economic Development and the Youth Economy
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
ESS 5 is currently not relevant			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
ESS 6 is currently not relevant			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
ESS 7 is currently not relevant			
<b>ESS 8: CULTURAL HERITAGE</b>			
ESS 8 is currently not relevant			
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
ESS 9 is currently not relevant			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION:</b> Prepare, disclose, consult, update, adopt, implement a Stakeholder Engagement Plan (SEP) for the Project.	The SEP shall be consulted, updated, adopted and disclosed, in a manner acceptable to the Association, no later than 30 days after the Financing Agreement's Effective Date. The SEP shall be implemented throughout Project implementation.	Ministry for Finance, Economic Development and the Youth Economy
10.2	<b>PROJECT GRIEVANCE MECHANISM:</b> 1. Establish, maintain and operate a grievance mechanism (GRM), as described in the SEP.  2. Submit quarterly reports to the Association on the functioning of the GRM.	1. Same timeframe than action 10.1. Once established, the GRM shall be operational throughout Project implementation.  2. Submit to the Association quarterly monitoring reports throughout Project implementation, no later than 45 days after each reporting period. The first report should be submitted 3 months after the Financing Agreement's Effective Date.	Ministry for Finance, Economic Development and the Youth Economy
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	Training to be provided for PCU staff and key stakeholders on: <ul style="list-style-type: none"> <li>● Environmental and Social Standards (ESS 1-10)</li> <li>● Environmental, Health and Safety Guidelines</li> <li>● Stakeholder Engagement Plan</li> <li>● Grievance Redress Mechanism</li> </ul>	Training for direct Project workers shall be conducted before the start of works. Training will thereafter continue throughout Project implementation.  Training of PCU staff will be conducted within 30 days of action 1.1.	Ministry for Finance, Economic Development and the Youth Economy
CS2	Training for Project contractors/workers on E-waste, occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.	Prior to the start of works.	Ministry for Finance, Economic Development and the Youth Economy

