

Organization of Eastern Caribbean States (OECS)

UNLEASHING THE BLUE ECONOMY OF THE CARIBBEAN PROGRAM (P171833)

DRAFT Environmental and Social Commitment Plan (ESCP)

16 November 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Organization of Eastern Caribbean States – OECS - (hereinafter the Recipient) will implement the “Unleashing the Blue Economy of the Caribbean” Project (the Project), through the OECS Commission. The International Development Association (hereinafter, the Association) has agreed to provide financing for the Project.
2. The Recipient, through the OECS Commission, 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 OECS Commission, 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 OECS Commission. 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	REGULAR REPORTING 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.	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.	PIU/OECS Commission
B	INCIDENTS AND ACCIDENTS 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.	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.	PIU/OECS Commission

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	ORGANIZATIONAL STRUCTURE 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. This shall include, at minimum, the following key E&S staff: • One (1) Environmental Specialist • One (1) Social Specialist	Hire key staff no later than 90 days after the Project Effective Date. This organizational structure shall remain in place throughout Project implementation.	PIU/OECS Commission
1.2	MANAGEMENT TOOLS AND INSTRUMENTS 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. a)	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). b)	PIU/OECS Commission
1.3	TECHNICAL ASSISTANCE 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.	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.	PIU/OECS Commission
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES 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. b) Update as needed and implement the LMP.	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. b) Throughout Project implementation	PIU/OECS Commission

2.2	GRIEVANCE REDRESS MECHANISM (GRM) FOR PROJECT WORKERS a) Establish, maintain, and operate a grievance mechanism for Project workers as described in the LMP and consistent with ESS2. b) Incorporate the requirements of the GRM for workers into the bidding documents and the corresponding contracts with consulting firms.	a) Establish the GRM before contracting workers under the Project and maintain it throughout Project implementation. b) Before starting bidding processes and thereafter incorporate in the respective contracts.	PIU/OECS Commission
2.3	CODE OF CONDUCT Establish provisions in the bidding documents with consulting firms to include a Code of Conduct to be signed by all workers. PIU workers shall also sign the Code of Conduct. The Code of Conduct shall 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.	Throughout Project implementation.	PIU/OECS Commission
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
While ESS3 is relevant for the Project, it does not currently entail specific responsibilities for the OECS Commission given the regional activities to be implemented.			
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, prevention of communicable diseases (e.g., COVID-19), in accordance with the ESMF, and in a manner acceptable to the Association.	Throughout Project implementation	PIU/OECS Commission
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.	Throughout Project implementation	PIU/OECS Commission
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
While ESS5 is relevant for the Project, it does not currently entail specific responsibilities for the OECS Commission given the regional activities to be implemented.			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

6.1	BIODIVERSITY RISKS AND IMPACTS Include in the ToR of regional activities, as needed, measures to manage the potential risks and impacts to biodiversity, in accordance with the ESMF and ESS6.	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.	PIU/OECS Commission
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
ESS 7 is not currently relevant.			
ESS 8: CULTURAL HERITAGE			
While ESS8 is relevant for the Project, it does not currently entail specific responsibilities for the OECS Commission given the regional activities to be implemented.			
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. b) Six-monthly reporting as set out in action A above.	PIU/OECS Commission
10.2	PROJECT GRIEVANCE MECHANISM 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. b) Report on project-level GRM implementation.	a) Establish the grievance mechanism, prior to the implementation of project activities and thereafter maintain and operate the mechanism throughout Project implementation b) Report on GRM as part of the six-monthly reports required under action A above.	PIU/OECS Commission
CAPACITY SUPPORT (TRAINING)			

CS1	Training to be provided to PIU staff on: ▪ ESF requirements ▪ Stakeholder engagement and GRM ▪ SEA/SH	Within 90 days after action 1.1. has been completed. Training will continue throughout Project implementation.	PIU/OECS Commission (with technical support of the Association)
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