Unleashing the Blue Economy of the Caribbean (UBEC)

Environmental and Social Management Framework

Government of Saint Vincent and the Grenadines

Government of Saint Lucia

Government of Grenada

OECS Commission

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LIST OF ACRONYMS

BDS	Business Development Services
CBO	Community-based Organisation
CCRIF	Caribbean Catastrophe Insurance Facility
CERC	Contingent Emergency Response Component
COAST	Caribbean Ocean and Aquaculture Sustainability Facility
EIA	Environmental Impact Assessment
E&S	Environmental and Social
EHS	Environmental Health & Safety
ESCP	Environmental and Social Commitment Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
FAD	Fish Aggregating Device
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
LMP	Labour Management Procedures
MSME	Micro, Small and Medium-sized Enterprise
NAP	National Adaptation Plan
NGO	Nongovernmental Organization
OECS	Organisation of Eastern Caribbean States
O&M	Operation and Maintenance
OHS	Occupational Health and Safety
PDO	Project Development Objective
PIU	Project Implementation Unit
PSC	Project Steering Committee
RAP	Resettlement Action Plan
RPF	Resettlement and Process Framework
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
SIDS	Small Island Developing States
SVG	Saint Vincent and the Grenadines
UBEC	Unleashing the Blue Economy of the Caribbean Program

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1. INTRODUCTION

1.1 Program Description

The Unleashing the Blue Economy of the Caribbean (UBEC) Program is to be implemented as a Series of Projects (SOP) over a five to fifteen-year period, with each project implemented over a five-year period as per projected country demand[1]. The Project's Development Objective (PDO) is to strengthen the enabling environment for the blue economy, economic recovery and resilience of selected coastal assets in participating countries and at sub-regional level. The PDO serves as an overall framework for strengthening the management and resilience of marine and coastal assets to stimulate select OECS economies at the regional, national and community levels. In particular, participating countries will benefit from improved competitiveness in two critical, interconnected sectors – tourism and fisheries – and one underlying enabling infrastructure service, waste management.

The SOP approach enables countries to join the program when they are ready, and to participate at different implementation levels within the same PDO framework. Investment projects to be initiated in FY2022 are to be led by the governments of Grenada, Saint Lucia, Saint Vincent and the Grenadines (SVG) and the OECS Commission (see Figure 1). A second phase comprising at least one additional country-level investment projects is expected to be initiated in FY2023-2025. Other Caribbean countries may participate from FY2024 onwards. The design of the second and subsequent phase of projects will consider the capacity of institutions, technical competencies, and challenges, and will benefit from lessons learned from phase one.

The Project is comprised of four components implemented in the tourism, fisheries and waste management sectors in the three Eastern Caribbean countries and at the regional level through the OECS Commission. A summary of the components is as follows with a detailed description in Annex 1.

COMPONENT 1: STRENGTHENING GOVERNANCE, POLICIES AND CAPACITY BUILDING FOR KEY PRODUCTIVE SECTORS

This component, through its two sub-components, targets national and regional policies, strategies, institutions, legal frameworks, and capacity building by the public sector necessary to support economic recovery and jobs and to improve the management of natural assets contributing to the regional marine environmental health and resilience.

COMPONENT 2 - SCALE UP ACCESS TO FINANCE AND INFRASTRUCTURE INVESTMENTS IN THE BLUE ECONOMY

Delivered through two subcomponents, this component includes an innovative financing mechanism to enable private sector-led growth and direct investments into economic activities that enhance ocean health and resilience leading to an increase in employment and greater GDP contribution from ocean assets, and broader uptake of climate resilient approaches.

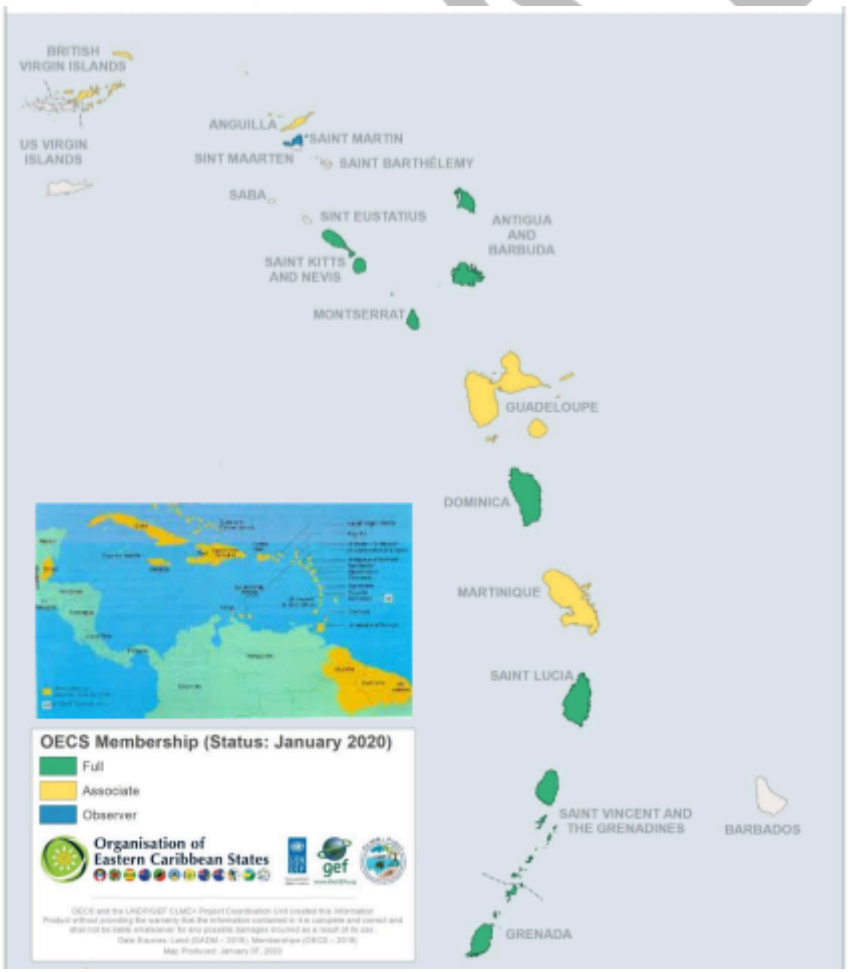
Subcomponent 2.1-Scale Up Access to Finance to Micro, Small and Medium-sized Enterprises (MSMEs) and Fisherfolk Communities: The project will focus on two financing mechanisms under

[1] The term "Program" refers to a Series of Projects (SOP). The SOP approach provides flexibility for considerable economies of scale and facilitates positive spillovers that accommodate for financial constraints.

this subcomponent: Regional MSME matching grants program and Expansion of the regional climate-risk insurance for fisheries.

Subcomponent 2.2 Scale Up Infrastructure Investments for Economic Resilience and Ocean Health: This subcomponent will support direct investments in resilient coastal infrastructure that generate jobs in the short-term and lay the foundation for long-term recovery through investments that help build a low-carbon, less polluting, more sustainable and resilient coastal economy that is adaptive to climate change. Public investments supported by this sub-component will serve to de-risk private investment by improving, restoring or preserving healthy and functioning marine ecosystems, and measures to prevent further degradation of key marine/coastal hotspots. Example of activities to be financed will include: i) enhancements of marine-based tourism infrastructure (e.g. visitor information, signage, access) to improve visitor experience and generate value from marine and coastal natural assets; ii) targeted investments in waste collection, segregation, recycling and disposal infrastructure to improve solid waste management systems and reduce plastics pollution; iii) pre- to post-harvest fisheries improvements to increase the value of fish products (such as small-scale solar powered processing and cold storage facilities), and investments in aquaculture to support food security and economic diversification for local communities; and, iv) restoration of nature-based infrastructure for coastal resilience and adoption of innovative technologies to strengthen monitoring and surveillance of the marine ecosystems.

Figure 1. The Eastern Caribbean Region[2]



[2] Source: https://clmeplus.org/doculibrary/members-of-the-organisation-of-the-eastern-caribbean-stated-oecs-map/

COMPONENT 3: CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC)

The CERC will support the capacity of participating countries to respond rapidly in the event of a future eligible emergency defined as "an event that has caused, or is likely to imminently cause, a major adverse economic and/or social impact associated with natural or man-made crises or disasters."

COMPONENT 4 - PROJECT MANAGEMENT, COMMUNICATION AND REGIONAL COORDINATION

The objective of this component is to ensure effective project implementation, monitoring of activities and final project evaluation. The component will finance the expenditures of Project Implementation Unit (PIU) in each country, including compliance with environmental and social safeguards stakeholder and citizens' engagement mechanism and the grievance redress mechanism.

1.2 Purpose of the Environmental and Social Management Framework (ESMF)

The ESMF establishes a process and defines the roles and responsibilities for screening and addressing environmental and social (E&S) issues for sub-projects from selection through review and approval, to implementation and monitoring across the three sectors covered by the Project. The guidance is presented as a framework as the location and design of the UBEC sub-projects are not known during project preparation.

The ESMF focuses primarily on Subcomponent 2.2. Scale up infrastructure investments for economic resilience and ocean health. Additionally, the ESMF addresses the potential E&S impact of Subcomponent 1 Strengthening Governance, Policies and Capacity Building and Subcomponent 2.1 Regional MSME matching grants program. This ESMF is complemented by the following instruments:

- Resettlement and Process Framework (RPF)
- Stakeholder Engagement Plan (SEP)
- Labour Management Procedures (LMP)
- Environmental and Social Commitment Plan (ESCP)

At its core, the ESMF offers guidance for the assessment and management of E&S risks and impacts associated with the implementation of sub-projects through a methodologically rigorous process of due diligence. The ESMF defines generic measures according to the mitigation hierarchy of avoidance, minimization, mitigation, offset or compensation. The ESMF includes a negative list of activities that will not be supported by UBEC.

Box 1 World Bank Environmental & Social Standards Mitigation Hierarchy

1: Avoidance. The most preferred form of mitigation. As a first step, the environmental and social assessment will identify and evaluate technically and financially feasible alternatives. When determining technical and financial feasibility of alternatives, both cost and benefits should be considered. The evaluation should impact on project design enabling the Borrower to choose alternatives that anticipate and avoid adverse environmental and social risks and impacts.

2: Minimization. Where avoidance is not possible, the environmental and social assessment will identify specific actions to minimize or reduce adverse environmental and social risks and impacts that are likely to arise throughout the project life cycle.

3: Mitigation. To manage the residual risks and adverse impacts after the avoidance and minimization steps, the environmental and social assessment will identify mitigation measures by establishing specific actions to ensure the project will meet the requirements of applicable ESSs and comply with relevant national laws and regulations. In case of existing facilities, these actions will include measures to rectify the prevailing risks and adverse impacts identified in the environmental and social audits or due diligence reports. All these measures normally form part of the environmental and social management plan for the project.

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4: Offset or Compensation. Where avoidance, minimization, or mitigation is not adequate to manage significant adverse risks and impacts, it may be appropriate to design and implement measures that compensate/ offset for residual risks and impacts. These measures do not necessarily eliminate the identified adverse risks and impacts, but they seek to offset them with comparable positive ones.

Source: World Bank. 2018. ESS1 Guidance note.

Due diligence for sub-projects also includes the identification of the most vulnerable populations as identified in the SEP including persons with disabilities and Lesbian, Gay, Bisexual, Transgender and Intersex (LGBTI) people. ESMF provides guidance to ensure the participation of these vulnerable populations in project activities and that corresponding mitigation measures are taken. The ESMF also offers guidance to identify the potential for Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). .

The ESMF explains the institutional context within which the E&S risk assessment and response is to occur. This includes a description of the institutional roles and responsibilities to ensure sound E&S management during project implementation, and an analysis of the legal and institutional framework of each of the three participating countries. Any gaps between the requirements of the World Bank Environmental and Social Standards (ESSs) and national laws and regulations are identified with corresponding measures to address these gaps.

As the CERC (component 3) is designed to provide swift response in the event of an eligible crisis or emergency. Annex 2 includes E&S guidance for when the CERC is activated. Specific training and capacity building actions and activities are also included to address environmental and social risks and enhance positive outcomes.

1.3 Institutional Roles and Responsibilities

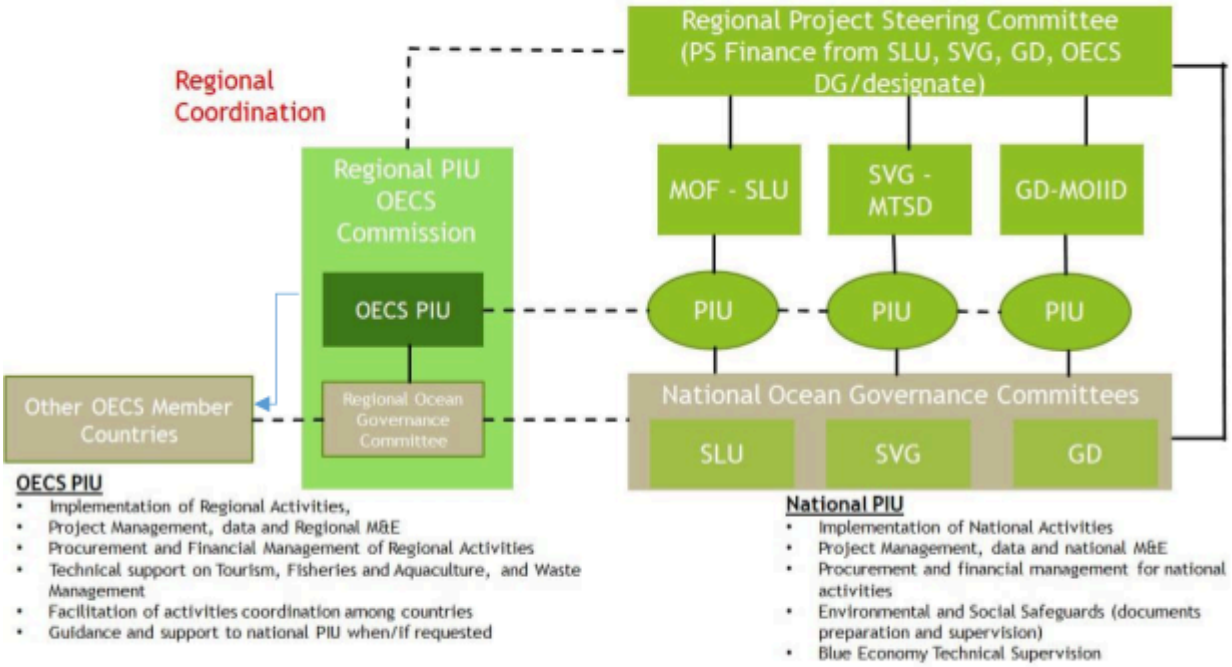
UBEC will be implemented at both the national and regional levels, under a coordinated framework. The implementation arrangements are designed to ensure clear ownership of the project components and to strengthen regional and inter-ministerial coordination among and within the participating countries. The implementation of this ESMF requires involvement of several stakeholders each with different roles and responsibilities to ensure sound environmental and social management during project implementation, as shown in Figure 2.

At the national level, the Ministry of Implementation (MOIID) in Grenada, the Ministry of Finance, Economic Development and Youth Economy (MoF) of Saint Lucia, and the Ministry of Tourism, Civil Aviation, Sustainable Development and Culture (MTSD) of Saint Vincent and the Grenadines will be responsible for project execution, in close collaboration with the implementing line ministries for each component. At the regional level, the OECS Commission will be the institution principally responsible for regional coordination, knowledge exchange, and providing additional capacity to project implementation and monitoring of impacts.

The Regional Project Steering Committee (PSC) will conduct the overall management/oversight of the project. The PSC would be composed of a Permanent Secretary-level representative from the Ministry of Finance from each country, and a representative from the OECS Commission (Director General or delegate). The PSC will be responsible for: 1) oversight of annual workplans, 2) regional procurement decisions, 3) discussion and agreement on regional policy issues related to the blue economy, 4) oversight of regional fiduciary matters; and 5) oversight of reporting requirements from National PIUs. The chair of the PSC will rotate among the three participating countries with the OECS Commission acting as Secretariat and member of the PSC

A dedicated PIU will be established within the OECS Commission and within each participating country. The regional PIU will be led by a full-time Project Manager and will include an environmental specialist and social specialist.

Figure 2. Institutional Arrangements for the Project



The regional PIU will be responsible for (i) facilitating the regional coordination of the Project through implementation support to the National PIUs, and (ii) implementing the regional grant-financed activities. More specifically, the regional PIU will be responsible for (a) providing input and coordinating support to the PSC on strengthening and harmonizing regional policies among the three participating countries to support economic recovery, jobs and ecosystem health (Subcomponent 1.1); (b) providing input to the Regional Steering Committee on overall implementation progress and any coordination challenges among participating countries; (c) managing and monitoring the Regional Micro, Small and Medium-sized Enterprises (MSME) Grant program to foster the recovery and the resilience of SMEs in the region (Subcomponent 2.1a), with support from a consulting firm (or group of consultants); (c) managing regional M&E and consolidating M&E data received from the national PIUs; and (d) fiduciary functions (procurement and financial management) for regional activities.

Each country will have a national PIU responsible for implementing national-level activities and coordinating with relevant national ministries. National level PIUs will have a full-time project manager that will be housed at the Ministry of Implementation for Grenada, the Ministry of Finance, Economic Development and Youth Economy of Saint Lucia for SLU, and the Ministry of Tourism, Civil Aviation, Sustainable Development and Culture for SVG. The full-time project manager will be responsible for ensuring the delivery of all national activities, including obtaining the necessary approvals for E&S documents. Each national PIU will also have an environmental specialist and a social specialist. The E&S specialists of the PIUs will be responsible, inter alia, to:

- Ensure that the ESMF is implemented in compliance with National Legislations and the World Bank Group Environmental and Social Standards (ESSs) requirements.
- Ensure that the necessary environmental authorizations and permits are obtained.
- Carry out screening applying the exclusion list to the potential sub-projects.
- Determine the scope of environmental work i.e., identify the magnitude, sensitivity and risk category of the sub-projects.
- Develop or hire consultants to develop the required instruments such as Environmental and social Impacts Assessment (ESIA), Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAPs);
- Conduct consultations for the sub-projects, documenting the consultations results and taking appropriate actions based on the consultations.
- Disclose the E&S instruments of the sub-projects.
- Undertake socialization, implementation, monitoring and reporting of the Project-level Grievance Redress Mechanism (GRM).
- Include the requirements and mitigation measures from ESMPs and LMP in the bidding documents and contractor contracts.
- Review all Terms of Reference for analytical work (such as drafting of policies, strategies and feasibility studies) to ensure E&S aspects are incorporated.
- Supervise and monitor on the ground implementation of sub-projects (either by hiring a supervision consultant or through designated E&S supervisors for daily on-site supervision).
- Ensure that contractors have an Environmental Health and Safety Officer (EHS), if needed.
- Review progress reports by the supervision engineer/consultant during civil works and conduct inspection of the sites.
- Ensure timely implementation of the actions agreed in the Environmental and Social Commitment Plan.
- Send ESIAs and associated ESMPs to the World Bank for approval.
- Send sub-project screening documents and site specific ESMPs to World Bank for approval.
- Send monthly progress reports to the world Bank capturing the status of subproject activities based on the template in Annex 3.
- Send bi-annual Project progress reports to the World Bank, based on the template provided in Annex 4 of this ESMF

2. LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 World Bank Environmental and Social Framework

The World Bank Environmental and Social Framework (ESF) protects people and the environment from potential adverse impacts that could arise from Bank-financed projects and promotes sustainable development. This framework provides broad coverage, including important advances on transparency, non-discrimination, social inclusion, public participation and accountability. The ESF also places more emphasis on building Borrower governments' own capacity to deal with E&S issues.

The ESF consists of:

- The World Bank's Vision for Sustainable Development.
- The World Bank's Environmental and Social Policy for Investment Project Financing, which sets out the requirements that apply to the Bank.
- Ten Environmental and Social Standards (ESSs), which set out the requirements that apply to Borrowers.
- Bank Directive: Environmental and Social Directive for Investment Project Financing.
- Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups.

Table 1 depicts the ESSs that are relevant to the Project and offers an overview of the relevance of the Standard for the Project.

Table 1. World Bank Environmental & Social Standards Relevant to the Project

Environmental & Social Standard	Relevance	Justification
ESS1 Assessment and Management of Environmental and Social Risks and Impacts	Relevant	Preliminary investments identified include, amongst others: (i) in fisheries and aquaculture: investments in harvest and post-haverst fisheries like small-scale solar powered processing/cold storage facilities and solar dryers; (ii) in tourism: upgrading tourism sites to enhance visitor experience (e.g., visitor centers, seafront upgrades, signage,), and rehabilitating coral reefs ; and (iii) in waste management: construction of a plant for the separation, recovery and treatment of waste, construction / installation of green points for waste collection, construction of a composting plant and, closure and rehabilitation of existing landfills. Impacts from these activities are expected to be site specific that can be mitigated. Typical construction related impacts are likely for new construction and refurbishment such as those related to waste management; air, water and noise pollution; sedimentation; occupational and community health and safety. The ESMF provides information on the requirements and processes for E&S due diligence of future activities.
ESS2 Labour and Working Conditions	Relevant	Project implementation will involve various workers, ranging from PIU staff to specialized personnel of consulting and implementation firms as well as unskilled labourers. Hence, the Project anticipates relying on direct and contracted workers. It is not defined if the Project will engage primary supply and community workers, but related provisions have been considered. In all cases, project stakeholders must adhere to the higher standard of either national labour laws or the World Bank ESS.

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Environmental & Social Standard	Relevance	Justification
		Government and, OECS employees involved in project implementation will remain subject to the terms and conditions of their contracts unless there is an effective legal transfer of their employment to the project. For this category of worker, only the OHS requirements under ESS2 apply. If community workers are engaged, the project will determine whether the labour will be voluntary or based on individual or community agreements. For community labour, the client will be guided by paragraphs 34-38 of ESS2. Potential labour risks include discrimination, workplace injuries and the transmission of COVID-19. ESS2 identifies the minimum age for employing or engaging a worker in project activities as the higher of age 14 or the age prescribed by national law. Each of the project countries establishes a minimum legal age for employment of 14 or older: age 16 in Grenada, 15 in Saint Lucia and 14 in St. Vincent and the Grenadines. Employment or engagement in project activities of a child over the minimum age permitted under national law and under the age of 18 will be subject to rigorous scrutiny and by no means they can be exposed to hazardous activities. Labour Management Procedures (LMP) with a dedicated Grievance Redress Mechanism (GRM) for project workers including provision on SEA/SH have been developed and disclosed.
ESS3 Resource Efficiency and Pollution Prevention and Management	Relevant	Investments in waste management such as improving collection, segregation, recycling and disposal of waste with emphasis to reduce plastic pollution are likely to have a positive environmental effect. During the upgrading of landfill(s) to improve their operation, leachate, toxin and GHG emissions will have to be managed to avoid environmental impacts. In addition, during civil works, impacts related to air, water and noise pollution along with waste disposal are likely. The ESMF describes the process to screen potential sub-projects and manage the E&S risks during implementation.
ESS4 Community Health and Safety	Relevant	The project will fund civil work activity that will take place within communities and fishing landing sites. Noise generated from construction works and the movement of heavy vehicles depending on the scale of the construction activities are potential community health impacts. These, however, are likely to be short term and not cause excessive nuisance. The ESMF includes guidance to assess the risk to community health and safety of any infrastructure investment. Mitigation measures will be included in the relevant ESMPs. Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) risks are considered low. A list of available SEA/SH services and points of service, including contact information for participating countries is included in the LMP. A person will be assigned in each PIU and trained to deal with SEA/SH grievances, should they arise. Staff of PIU, consultancy firms, contractors and supervision firms will be required to sign a workers' code of conduct, including provisions on SEA/SH. A

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Environmental & Social Standard	Relevance	Justification
		sample of Code of Conduct is included in the ESMF as annex 5 and also in the LMP.
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Relevant	Component 1 will finance the strengthening of regional and national policies that may create potential restriction of access to fishers, tourism tour operators and the yachting sector to areas in which they usually earn a livelihood. Regulations for sensitive marine protected areas may result in areas that are traditionally used for tourism or fishing activities becoming exclusion areas. Under Component 2.2, the UBEC Project will fund blue economy-based infrastructure in fisheries and aquaculture, tourism and waste management. The type and location of these activities has not yet been determined. Therefore, it is not yet known whether the project will result in any land acquisition, involuntary resettlement or economic displacement or even temporary relocation as a result of these activities. To address potential risks and impacts under ESS5, the participating countires developed a Resettlement and Process Framework (RPF). Once the location of subprojects is determined and the specific information is available, Resettlement Actions Plans (RAPs) will be prepared for those subprojects causing impacts covered under ESS5 and in line with the RF. No construction activities will be undertaken before all compensation and assistance, in line with the requirements of ESS5, is given to all affected persons.
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	Relevant	Through sub-component 2.2, the Project will fund activities aiming to enhance visitor experience from marine and nature-based tourism. Investments in the restoration and management (e.g., zoning demarcation) of key marine habitats (i.e., corals, mangroves, seagrasses), coral reef development/restoration and aquaculture technologies are some of the activities envisaged. The ESMF includes screening criteria for sub-project selection and based on the risks identified due deligence will be carried out to ensure that project activities do not alter or cause destruction to critical or sensitive natural habitats. The project also aims to support development and implementation of sector standards, policies, and operational guidelines across the three sectors. The ToR for the analytical work will be reviewed and the E&S considerations included to protect the marine and terrestrial ecosystems during future investments.
ESS7 Indigenous Peoples/ Historically Underserved Traditional Local Communities	NOT Relevant	There is no population in the areas of intervention that can be considered indigenous peoples as per the four cumulative criteria set forth in ESS7.
ESS8 Cultural Heritage	Relevant	Project activities will be implemented in areas that may be valued for their cultural heritage, both tangible and intangible. The implementation of the project is not expected to have any negative impact on cultural heritage sites, but rather enhance them for the benefit of the blue economy. The ESMF includes chance find procedures in line with the national legislation and the ESS8 requirements. Additionally, the ESMF includes the requirements needed to prepare a Cultural Heritage Management Plan to ensure all

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Environmental & Social Standard	Relevance	Justification
		potential impacts on traditional conservation practices, and/or natural features with cultural significance to local communities are properly managed.
ESS9 Financial Intermediaries	NOT relevant	The project design does not involve any financial intermediaries.
ESS10 Stakeholder Engagement and Information Disclosure	Relevant	Stakeholders are: (i) national government ministries, departments and agencies working directly or indirectly in the three prioritized sectors (tourism, fisheries and aquaculture, and waste management); (ii) OECS Commission; (iii) micro, small and medium-sized enterprises (SME) and the associations representing their interests active in these sectors (e.g., domestic commercial/artisanal/subsistence fishing, crab harvesting and sea moss harvesting; diving & snorkelling, yachting & marine charters, water taxis, vendors, small tour guides, tour operators, chambers of commerce, bottle processing firms); (iv) civil society organisations and civil society at large (e.g., non-governmental organizations (NGOs), community-based organisations (CBOs), universities and technical schools, the media); (v) government and civil society organisations active in the tourism, fisheries & aquaculture and waste management sectors operating at a regional scale; and (vi) vulnerable individuals and groups, including female headed households and those less able to care for themselves, notably children, the elderly, persons with disabilities, seasonal resource users and LGBTI. The three participating countries developed, consulted and disclosed a Stakeholder Engagement Plan (SEP) in proportion to the nature and scale of the project and its associated risks and impacts, including a project level GRM. During implementation and consistent with the SEP and ESMF, as well as ESS10, stakeholder engagement will be continuous and, in this regards, public consultations will take place at the subproject level with affected and other interested parties, including vulnerable groups, prior to subproject development.

2.2 National Policy and Legal Frameworks and Applicability with the World Bank ESF

This section provides an overview of the national legal frameworks versus the requirements set forth in the World Bank ESSs and a summary of international laws and treaties applicable in the Borrower countries. A detailed listing of these is presented in Annex 6. The section also compares this framework to the requirements of the relevant ESSs, identifies any gaps and suggests measures to address these gaps.

International and Regional Treaties and Conventions

The three participating OECS member states have made binding commitments to a number of international treaties and conventions covering the three sectors under which sub-projects will be financed. Five of these are presented in Table 2. More details are presented in Annex 6.

Table 2. Relevant treaties and conventions

Treaty/Convention	Description
International Convention for the Prevention of pollution from ships (MARPOL)	The main international convention covering prevention of pollution of the marine environment by ships from operational or accidental causes, adopted in 1973.

Treaty/Convention	Description
Caribbean Regional Fisheries Mechanism (CRFM)	An inter-governmental organization with a mission to promote and facilitate the responsible utilization of the region's fisheries and other aquatic resources for the economic and social benefits of the current and future population of the region. The CRFM was established in 2002 and is headquartered in Belize City, Belize.
United Nations Convention on the Law of the Sea (UNCLOS)	An international agreement signed in 1982. The convention has resolved several important issues related to ocean usage and sovereignty, such as establishing freedom-of-navigation rights, setting territorial sea boundaries 12 miles offshore and setting exclusive economic zones up to 200 miles offshore.
The Convention for the Protection and Development of the Marine Environment in the Wider Caribbean Region (the Cartagena Convention)	A regional legal agreement for the protection of the Caribbean Sea signed in 1973 and supported by three protocols on Oil Spills, Specially Protected Areas and Wildlife (SPAW) and Land Based Sources of Marine Pollution (LBS).
Convention on Biological Diversity (CBD)	The overall objective of the 1993 CBD is to develop a national strategy for the conservation and sustainable use of biological diversity. The CBD is often viewed as the key document regarding sustainable development. As of 2016, the convention has 196 parties, including all full members of the OECS.

National Legal Frameworks

As depicted in tables 3, 4 and 5 there are several acts and regulations relevant to the UBEC project across the three sectors in the participating countries. Details of some of the laws are given in Annex 6. The various instruments developed for the project detail the measures to be followed to ensure the project activities are in accordance with the ESF requirements.

Grenada

Key legislation governing the preparation of environmental and social studies and assessments includes the *Physical Planning and Development Control Act, 2016* and the Waste Management Act of 2001. Table 3 identifies national laws, policies and plans corresponding to the World Bank's ESF and that address the development of Grenada's blue economy with particular emphasis on tourism, fisheries & aquaculture and waste management.

Several important legislative and regulatory gaps must be considered in implementing the ESMF. These include:

- The absence of a statutory National Physical Development Plan or National Land Use Policy
- Draft status of EIA regulations
- Draft status of the Climate Resilience, Environment and Natural Resource Management Bill, which will broaden the Department of Environment's environmental protection mandate
- The lack of National Biodiversity Strategy goals dedicated to pollution
- The lack of a Social Protection Act, combined with an outdated Country Poverty Assessment, last conducted in 2008.

Table 3. Grenada legislation, policies and plans relevant to development of a blue economy

National Laws, Policies and Plan	ESS2	ESS3	ESS4	ESS5	ESS6	ESS8	ESS10
Abatement of Litter Act, 2015		✔			✔		
Accidents and Occupational Diseases (Notification) Act	✔		✔				
Beach Protection Act		✔			✔		

Carriacou Land Settlement and Development Act				✔	✔		
Coastal Zone Task Force		✔			✔		
Constitution Order 1973	✔			✔			
Employment Act of 1999	✔		✔				
Environmental Impact Assessment (EIA) Legislation				✔		✔	
Environmental Impact Assessment Regulations, 2011					✔	✔	
Environmental Management Act, 2014		✔			✔		
Fisheries (Marine Protected Areas) Regulations		✔			✔		
Fisheries Act 1986		✔			✔		
Forest, Soil and Water Conservation Act					✔		
Grenada Integrated Water Resources Management Plan 2019		✔			✔		
Grenada National Biodiversity Strategy and Action Plan 2016-2020					✔		
Grenada National Hazard Mitigation Policy					✔		
Grenada National Land Policy					✔		
Grenada National Ocean Policy		✔			✔		
Grenada National Water Policy 2019		✔			✔		
Grenada Protected Area System Plan					✔		
Grenada Solid Waste Management Authority Act		✔					
Grenada Tourism Authority Act, 2013					✔	✔	
Grenada : Marine Non-Native Species Management Framework					✔		
Grenville Local Area Plan					✔	✔	✔
Integrated Coastal Zone Management Act, 2019		✔			✔		
Integrated Coastal Zone Management Policy, 2015		✔			✔		
Land Acquisition Act (CAP 159), 1945 and Land Acquisition (Amendment) Act 16, 1991				✔			
Land and Marine Management Strategy for Grenada		✔			✔		
National Climate Change Adaptation Plan (NAP) for Grenada, Carriacou and Petite Martinique 2017-2021		✔			✔		
National Conservation Trust Fund					✔		
National Disaster (Emergency Powers) Act			✔				
National Disaster Management Plan			✔				
National Environment Policy & Management Strategy					✔		
National Heritage Protection Act					✔	✔	
National Parks and Protected Areas Act					✔	✔	
National Physical Development Plan (Draft)		✔			✔	✔	✔
National Sustainable Development Plan 2020-2035					✔		
National Trust Act					✔		

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National Water and Sewerage Authority Act		✔			✔		
Non-Biodegradable Waste Control Act, 2018		✔					
Oil in Navigable Waters Act		✔					
Oyster Fishery Act					✔		
Pesticides Control Act		✔			✔		
Petroleum and Natural Gas Deposits Act		✔			✔		
Physical Planning and Development Control Act, 2016		✔		✔	✔	✔	✔
Ports Authority Act					✔		
Power-Craft Act		✔					
Protected Area, Forest and Wildlife Act					✔		
Public Health Act		✔	✔				
Revised Forest Policy for Grenada, Carriacou and Petite Martinique					✔		
Sauteurs Local Area Plan					✔	✔	✔
Strategic Program for Climate Resilience		✔			✔		
Strategy for the implementation of the National Forest Policy 2018-2028 for Grenada, Carriacou and Petit Martinique					✔		
The Factories Act	✔		✔				
The Land Settlement Act (CAP 161) of 1933				✔			
Waste Management Act 2001		✔			✔		
Water Quality Act		✔					

Saint Lucia

Key legislation governing the preparation of environmental studies and assessments includes the Physical *Planning and Development Act, 2005*. Table 4 identifies national laws, policies and plans corresponding to the World Bank's ESF that address the development of Saint Lucia's blue economy with particular emphasis on tourism, fisheries & aquaculture and waste management.

Several important legislative and regulatory gaps must be considered in implementing the ESMF. These include:

- The absence of a statutory National Physical Development Plan or National Land Use Policy
- Absence of legislation to enable the existing Integrated Coastal Zone Management Policy.
- Draft status of the Systems Plan for Protected Areas
- Draft status of the Environmental Management and Climate Change Bill
- Social Protection legislation remains in draft form.

Table 4. Saint Lucia Legislation, policies and plans relevant to development of a blue economy

National Laws, Policies and Plan	ESS2	ESS3	ESS4	ESS5	ESS6	ESS8	ESS10
Beach Protection Act, 1967					✔		
Biodiversity Conservation and Sustainable Use Bill (draft), 2008					✔		
Climate Change Adaptation Policy, 2015					✔		
Coastal Zone Management in Saint Lucia: Policy, Guidelines and Selected Projects, 2004		✔			✔		

Constitution of Saint Lucia, Cap 1.01, 1979				✔			
Crown Lands Act, 2002					✔		
Disaster Management Act, 2006					✔		
Environment Impact Assessment Regulations (draft)		✔			✔		
Environment Management Bill (draft), 2014		✔			✔		
Fisheries Act, 1984		✔			✔		
Forest, Soil and Water Conservation Act, 1945					✔		
Hazard Mitigation Policy, 2006		✔			✔		
Land Acquisition Act, Cap 5.04, 1946				✔			
Land Conservation and Improvement Act, 1992					✔		
Maritime Areas Act, 1984					✔		
Minerals (Vesting) Act, 1989					✔		
National Adaptation Plan (NAP) 2018-2028		✔			✔		
National Agricultural Policy, 2009 – 2015		✔			✔		
National Biodiversity Strategy and Action Plan, 2000					✔		
National Conservation Authority Act, 1999					✔		
National Environment Policy (NEP) and National Environmental Management Strategy (NEMS), 2004		✔			✔		
National Fisheries Plan (draft), 2013					✔		
National Invasive Species Strategy (draft), 2011					✔		
National Land Policy, 2007		✔			✔		
National Tourism Policy (draft), 2009		✔			✔	✔	
National Vision Plan, 2008					✔		
Oil in Navigable Waters Act, 1984		✔					
Oil Spill Contingency Plan, 2007		✔			✔		
Parks and Beaches Commission Act, 1983					✔		
Physical Planning and Development Act, 2005		✔		✔	✔	✔	✔
Public Health Act, 1975		✔					
Saint Lucia Air and Sea Ports Authority Act, 1983							
Saint Lucia Education Act (1999)	✔		✔				
Saint Lucia Employees (Occupational Health and Safety) Act (1985)	✔		✔				
Saint Lucia Equality of Opportunity and Treatment in Employment and Occupation Act (2000)	✔		✔				
Saint Lucia Labour Code, no. 37 of 2006	✔		✔				
Saint Lucia Minimum Wages Act (1999; amended)	✔		✔				
Saint Lucia National Trust Act, 1975					✔		
Sectoral Adaptation Strategy and Action Plan for the Agricultural Sector (Agriculture SASAP) 2018-2028					✔		

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Sectoral Adaptation Strategy and Action Plan for the Fisheries Sector (Fisheries SASAP) 2018-2028					✔		
Sectoral Adaptation Strategy and Action Plan for the Water Sector (Water SASAP) 2018-2028		✔			✔		
Shipping Act, 2000		✔					
Village Tourism Policy and Strategy (draft), 2019					✔	✔	
Tourism Strategy and Action Plan 2020-2030 (2019)					✔	✔	
Waste Management Act, 2004					✔		
Water and Sewerage Authority Act, 1999		✔			✔		
Wildlife Protection Act, 1980		✔			✔		

Saint Vincent and the Grenadines

Key legislation governing the preparation of environmental and social studies and assessments includes the Town and Country Planning Act of 1992 and the 1991 Environmental Health Services Act. Table 5 identifies national laws, policies and plans corresponding to the World Bank's ESF and that address the development of Saint Vincent and the Grenadines' blue economy with particular emphasis on tourism, fisheries & aquaculture and waste management.

Several important legislative and regulatory gaps must be considered in implementing the ESMF. These include:

- The lack of a statutory National Physical Development Plan limits capacity to adequately address natural resource management and unregulated land use.
- A draft Environmental Management Bill, which would strengthen environmental assessment.
- A a gap in legislation to properly address water quality in the marine environment.

The lack of a Social Protection Act, combined with an outdated Country Poverty Assessment last conducted in 2008.

Table 5. Saint Vincent and the Grenadines legislation, policies and plans relevant to development of a blue economy

National Laws, Policies and Plan	ESS2	ESS3	ESS4	ESS5	ESS6	ESS8	ESS10
Accidents and Occupational Diseases (Notification) Act, 1952	✔		✔				
Beach Protection Act of 1981		✔			✔		
Birds and Fish Protection (Amendment) Ordinance (No. 18 of 1954)					✔		
Central Water & Sewerage Authority Act of 1991		✔					
Continental Shelf Act					✔		
Convention on Oil Pollution Damage Act		✔			✔		
Customs (Management Control) Act					✔		
Dumping at Sea Act of 2002		✔					
Electricity Supply Act, 1973					✔		
Employers and Servants Act, 1937	✔		✔				
Employment of Foreign Nationals and Commonwealth Citizens Act, 1973	✔		✔				

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Employment of Women, Young Persons and Children Act, 1935	✔		✔				
Environmental Health Services Act, 1991	✔	✔	✔		✔		
Environmental Management Bill, 2009				✔			
Equal Pay Act, 1994	✔		✔				
Factories Act, 1955 (Cap. 335)	✔		✔				
Fisheries Act of 1986 and Regulation of 1987					✔		
Forestry Resource Conservation Act of 1945					✔		
General Guidelines for Organisations: Safe Working During the COVID–10 Pandemic – SVGNS 85:2020	✔		✔				
Grenadines Trans-boundary Multi-use Marine Zoning Plan					✔		
High Seas Fishing Act and Regulation of 2001					✔		
Land Acquisition Act, CAP 322, 1947				✔			
Land Adjudication Act CAP 5:06, 1984				✔			
Land Settlement and Development Act, CAP 242, 2009				✔			
Litter Act of 1991		✔			✔		
Management of Ship-Generated Solid Waste Act of 2002		✔					
Marine Parks Act of 1997		✔			✔		
Marine Pollution Prevention Act of 2015		✔			✔		
Maritime Areas Act of 1989		✔			✔		
Maritime Security Act					✔		
Mayreau Environmental Development (SVG) Incorporation Act		✔			✔		
Medium-Term Economic Strategy					✔		
Mineral (Vesting) Act					✔		
Mustique Conservation Act of 1989					✔		
National Economic and Social Development Plan 2013-2025					✔		
National Emergency and Disaster Management Act, 2006					✔		
National Environmental Management Act (Draft), 2009		✔			✔		
National Environmental Management Strategy and Action Plan (NEMS)		✔			✔		
National Fisheries and Aquaculture Policy					✔		
National Parks Act, 2002		✔			✔	✔	
National Parks and Protected Areas Systems Plan 2010-2014					✔	✔	
National Tourism Policy (2003)					✔	✔	

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Occupational Safety and Health Act of 2017	✔		✔				
Oil Fuel (Handling and Storage) Act *(RSVGPF)*		✔			✔		
Oil in Navigable Waters Act		✔			✔		
Oil Pollution (Liability and Compensation) Act		✔			✔		
Petroleum (Production) Act		✔			✔		
Port Authority Act of 1987					✔		
Powercraft Act					✔		
Protection of Employment Act, 2003	✔		✔				
Public Health Act No. 9 of 1977		✔			✔		
Public Health (Amendment) Act, 2020	✔		✔				
Public Health (COVID–19) Rules, 2021	✔		✔				
Revised National Biodiversity Strategy and Action Plan, 2017		✔			✔		
Constitution Order 1979, Updated 2005	✔		✔	✔			
National Ocean Policy (NOP), 2018					✔		
National Energy Policy (NEP) and National Energy Action Plan, 2009					✔		
Sustainable Integrated Development & Biodiversity Conservation in the Grenadines Islands					✔		
National Trust Act, 2007 (as amended)					✔	✔	
Tobago Cays Marine Parks Act of 1999		✔			✔		
Town & Country Planning Act No. 45, 1992 (amended in 2005)				✔	✔	✔	✔
Trade Disputes (Arbitration and Inquiry) Act, 1940	✔		✔				
Trade Unions Act, 1950	✔		✔				
Wages Councils Act, 1953	✔		✔				
Waste Management Act of 2000		✔			✔		
Wildlife Protection Act of 1987					✔		

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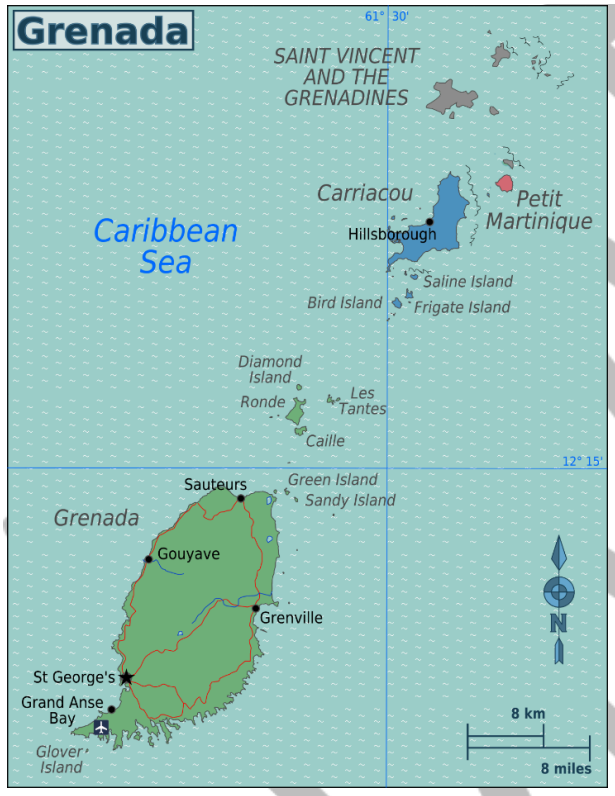
3. ENVIRONMENTAL AND SOCIAL SETTING

The OECS countries share many common characteristics of topography, geology, ecology, water resources, history and demographics. **Annex 7** provides a brief summary of physical, biological and socio-economic conditions of each of the countries.

Grenada

It is the southernmost island of the north-south arc of the Lesser Antilles, lying in the eastern Caribbean Sea about 100 miles (160 km) north of the coast of Venezuela. Oval in shape, the island is approximately 21 miles (34 km) long and 12 miles (19 km) wide. The southern Grenadines—the largest of which is Carriacou, about 20 miles (32km) north-northeast, with an area of 13 square miles (34 square km)—are a dependency.

Figure 3. Map of Grenada[3]



Saint Lucia

Saint Lucia, island state in the Caribbean Sea. It is the second largest of the Windward group in the Lesser Antilles and is located about 24 miles (39 km) south of Martinique and some 21 miles (34 km) northeast of Saint Vincent. Saint Lucia is 27 miles (43 km) long and has a maximum width of 14 miles (23 km). The capital and major port is Castries.

[3] Source: https://commons.wikimedia.org/wiki/File:Grenada_Regions_map.svg

Figure 4. Map of Saint Lucia[4]



Saint Vincent and the Grenadines

Saint Vincent and the Grenadines, a multi-island country lying within the Lesser Antilles, in the eastern Caribbean Sea. It consists of the island of Saint Vincent and the Grenadine Islands, which stretch southward toward Grenada. The island of Saint Vincent lies about 20 miles (32 km) southwest of Saint Lucia and 100 miles (160 km) west of Barbados. It is 18 miles (30 km) long and has a maximum width of 11 miles (18 km). The larger islands of the Grenadines associated with Saint Vincent are Bequia, Canouan, Mayreau, Mustique, Prune (Palm) Island, Petit Saint Vincent Island, and Union Island. The Tobago Cays, just to the east of Mayreau, have been designated a wildlife reserve.

[4] Source: https://upload.wikimedia.org/wikipedia/commons/3/3f/Saint_Lucia_geography_map_en.png

Figure 5. Map of Saint Vincent and the Grenadines[5]



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[5] Source: https://upload.wikimedia.org/wikipedia/commons/thumb/8/86/Saint_Vincent_and_the_Grenadines.svg/330px-Saint_Vincent_and_the_Grenadines.svg.png

4. ENVIRONMENTAL AND SOCIAL PROCEDURES

This section describes the environmental and social procedures to follow for the selection and implementation of sub-projects.

4.1 Potential Environmental and Social Risks from the Project

The environmental and social risk ratings of the project are both "Substantial" under the World Bank ESF. Potential environmental and social risks identified based on the typology of potential sub-projects are summarized in table 6.**Table 6. Summary of Environmental and Social Risks Associated with Investment in Tourism, Fisheries & Aquaculture and Waste Management**

Driver	Potential Environmental Risks	Example of UBEC Activities
Infrastructure/ Construction	• Air pollution from improper dust management at the site • Noise pollution • Poor solid waste management • Soil and water pollution caused by runoff of concrete dust or petroleum compounds from leaking equipment or stored materials • Contamination of groundwater and surface water by discharged effluent • Sedimentation • Occupational health and safety risks • Damage to natural habitat and loss of species and habitat • Road and traffic safety • Unsafe working conditions	• Enhancement of tourism sites including construction/upgrades to visitor centers, seafront upgrades. • Construction/rehabilitation of pre and post harvesting facilities
Landfill works	• Noise pollution • Groundwater contamination • Greenhouse gas emissions • Leachate management • Release of toxins	• Upgrade existing landfills to improve their operational conditions • Closure of small landfill and potentially creation of a new sanitary landfill
Reef rehabilitation and activities in sensitive areas	• Stress on reefs from increased tourism • Loss of species and habitats • Disturbance to flora and fauna	• coral reef development/restoration • Tours, conservation, research at Ramsar site
Improvements to increase fish harvesting	• Over extraction of wild species/overfishing • Physical disturbance to the seabed • Input of litter (solid waste, micro-sized litter, discarded or abandoned fishing gear) • Alteration of migration routes • Redistributing stocks • Damage to coral reefs through improper fishing techniques/poor vessel navigation	• Construction and installation of Fish Aggregating Devises • Enhancement of Reef Fishery
Aquaculture	• Sedimentation of nearshore coastal habitats • Input of nutrients from diffuse and point sources • Input of organic matter – diffuse sources and point sources	• Aquaculture technologies improvements
Driver	**Potential Social Risks**	**Example of UBEC Activities**

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Physical geography	• Wide geographical area encompasses both onshore and offshore areas of three countries in the OECS, including some small islands and cays. These are difficult to reach and can present challenges to monitoring of social standards	• Monitoring community health and safety and labour conditions
Strengthened Regulations and policies	• Potential restriction of access to fishers, tourism tour operators and yachting sector to areas in which they usually earn a livelihood	• Establishment of Marine Protected Area
	• Negative reaction of formal and informal businesses in the three sectors to new policies and standards (e.g., licensing system for tourism operators, phytosahnitary standards applicable for those in the fisheries sector, financial framework for waste management), with otential that they could be cost restrictive	• Develop standards for beaches, marinas and boat operators
Inadequate socialization of project activities	• Potential exclusion of some groups from project benefits and activities, particularly if there is no adequate socialization of project activities, criteria does not account for the wide range of potential beneficieries including informal businesses, and if no measures are taken to avoid elite capture	• Access to MSME grant matching scheme, COAST insurance and infrastructure investments
Public works	• Potential land acquisition, involuntary resettlement and/or economic displacement at the subproject level • Other limited adverse site-specific impacts derived from construction works	• Infrastructure works under component 2.2

These potential environmental and social risks are exacerbated due to the lack of existing E&S capacity at the country level to assess, manage and monitor them – PIUs will need to be created and social specialists to be hired.

The UBEC project will support strengthening of policies and institutions to foster the blue economy, an innovative grant mechanism to boost MSMEs in the three prioritized value-chains (fisheries and aquaculture, tourism and waste management), the expansion of the COAST climate risk insurance and scale up of infrastructure investments in the prioritized sectors. The activities to be undertaken under the proposed Project will create economic and social benefits to MSMEs and informal businesses with a robust enabling environment to economic growth and job generation as well as to formalize them and hence, access a broader range of financing opportunities. Infrastructure investments will go beyond, benefitting communities in general, by enhancing tourist influx, boosting job creation and economic recovery.

4.2 Disadvantaged and Vulnerable Groups

All three participating countries are Small Island Developing States (SIDS) which are highly vulnerable to natural hazards and heavily dependent on foreign tourism and domestic marine fisheries for income generation, foreign exchange, jobs, and food security. While they are considered upper-middle income economies[6], the three participating countries rank low in the Human Development Index (HDI) relative to other Eastern Caribbean countries, with correspondingly high rates of household poverty (see Table 7).

6 https://datahelpdesk.worldbank.org/knowledgebase/articles/906519-world-bank-country-and-lending-groups

Table 7. Indicators of Well-being for Eastern Caribbean countries[7]

Country	HDI Ranking (2019)	Household Poverty Levels
St. Vincent and the Grenadines	97	30.2%
Dominica	94	28.8%
Saint Lucia	86	28.8%
Grenada	74	37.7%
Antigua and Barbuda	78	18.3%
St. Kitts and Nevis	74	21.0%
Barbados	58	15.0%

In addition to low-income households that depend on fisheries or tourism, vulnerable populations include lone parent and female-headed households and those less able to care for themselves, notably children, the elderly, and persons with disabilities. Other vulnerable groups include the landless, disenfranchised/seasonal workers in the tourism and fisheries sectors, immigrant groups with precarious residency status – including refugee claimaints, and LGBTI communities.

The most vulnerable persons working in the blue economy sectors are identified in Table 8. The sectors most likely to be affected includes fisheries and related marine resource-based activities. A second sector includes coastal and marine-based tourism. Finally, pollution-generating upstream economic activities such as agriculture and agro-forestry may be affected where these activities impact downstream marine ecosystems and water quality. Other types of adverse impacts on livelihoods may occur as a result of new or expanded development activity. These include economic displacement due to changes in land use or an expansion of development activities, or physical displacement due to land acquisition for the purposes of new development. These types of adverse impacts are addressed in the RPF.

Table 8. Vulnerable sectors and populations

Potentially Affected Sector	Potentially Affected Livelihoods[8]
Fisheries & other marine-based resource extraction activities Exploitation of marine fish stocks	• Domestic commercial fishing • Artisanal fishing • Subsistence fishing • Crab harvesting • Sand & aggregate mining • Sea moss harvesting • Sea urchin harvesting
Marine-based tourism activities Tourist facilities in low-lying coastal areas which pose risks to local ecosystems through over-use of recreational areas; disposal of untreated sewage; and generation of large volumes of solid waste.	• Diving & snorkelling • Yachting & marine charters • Water taxis • Vending • Horseback riding • Small tour guides • Sport fishermen

[7] HDI Ranking from UNDP. 2020. Human Development Report. http://hdr.undp.org/en/content/latest-human-development-index-ranking; Poverty levels from *UN. (2016). Sub-regional country programme document for Barbados and the OECS (2017-2021).* *https://www.bb.undp.org/content/barbados/en/home/library/sdg/sub-regional-country-programme-document-for-barbados-and-the-oec.html*

[8] Many of these livelihoods overlap. For example, tour guides may also rely on fishing.

Potentially Affected Sector	Potentially Affected Livelihoods[8]
	• Tour operators • Tourist resorts
Upstream activities within the coastal zone with a negative impact on downstream marine environments Agricultural activities in upland watersheds resulting in harmful amounts of pollutants to flow into estuaries and coastal waters	• Agriculture • Aquaculture • Forestry • Quarrying

Adapted from OECS. 2019. CROP Process Framework.

The risk of vulnerable and disadvantaged groups being excluded from project activities and/or benefits will be mitigated by means of several actions integral to project design. These include eligibility criteria for access to funded project activities designed to reach otherwise marginalized groups, equal opportunities for employment in project activities by addressing discrimination and a robust stakeholder engagement process. Stakeholder engagement in particular will be designed to ensure that all vulnerable and disadvantaged groups are identified, consulted, and provided with opportunities to participate in and benefit from project activities.

Stakeholder engagement will be guided by the project's Stakeholder Engagement Plan (SEP) which identifies key stakeholders and offers guidance on how they will be engaged, the timing of stakeholder engagement throughout project life cycle, how feedback will be solicited, recorded and monitored, the implementation of a monitoring and evaluation mechanism, who will be responsible for stakeholder engagement.

The ESMF gives special consideration to gender inclusion. A gender-responsive approach, supportive of gender equality and women's empowerment, will be adopted in the design, implementation and monitoring of the overall project and of the individual sub-projects designed and implemented by contractors under Component 2. All contractors and beneficiaries will be expected to comply with the project's gender guidelines included in the project's LMP, and their performance with regard to gender mainstreaming will be tracked throughout the project by means of a Gender Tracking Tool. In addition, the SEP provides a project level GRM with considerations for Sexual Exploitation and *Abuse* and Sexual Harassment (*SEA*/*SH*).

4.3 Environmental and Social Process

The process whereby environmental and social risks in relation to individual sub-projects are identified, assessed and managed is set out below. The assessment of environmental and social risks relates to Subcomponent 2.

Step 1. Screening of sub-projects

All potential sub-projects will be screened by the national E&S specialists of each PIU. During the screening, all potential sub-projects will be reviewed (i) against a negative list given in Annex 8, and (ii) a checklist list to identify the possible negative impacts (Annex 9). Sub-projects proposing activities on the negative list will be either rejected or allowed to proceed only if the sub-project is redesigned to remove these activities.

Sub-projects will be screened against the following criteria to help identify possible risks. The screening checklist in Annex 9 is to be completed for each sub-project. This screening can be informed by available information such as maps showing key features such as national parks, protected areas, forests, rivers, etc.; topographic maps; cultural heritage maps; planning records;

literature review and site visits. If "yes" is answered to any question, then in Step 2 the magnitude of the risk will be analysed to inform the sub-project risk rating.

- Will the subproject have the potential to cause adverse impacts to natural habitats?
- Will the sub-project negatively impact protected areas or defined buffer zones?
- Will the sub-project have potential impacts on threatened and/or endangered species and their habitats?
- Will the sub-project have direct impacts on ecosystem services that may result in adverse health and safety risks to affected communities?
- Will the sub-project generate hazardous waste?
- Will the sub-project affect groundwater quality or the quality of water bodies?
- Will the sub-project lead to sedimentation?
- Will the sub-project involve activities that are likely to have adverse impacts on the local community?
- Will the sub-project result in potential traffic and road safety risks to workers, communities and road users throughout the sub-project life cycle?
- Will the sub-project induce encroachment of nearby areas?
- Will the sub-project lead to negative impacts on the health of the local population?
- Will the sub-project negatively affect surrounding properties?
- Will the sub-project lead to diverse and multiple E&S impacts extended over a large area?
- Will the sub-project potentially cause irreversible impacts or impacts not easily mitigated?
- Will the sub-project result in reduced or restricted access to the resources in a protected area?
- Will the sub-project result in removal or eviction of anyone from a protected area?
- Will the subproject require the acquisition of land?
- Will the subproject activities lead to physical or economic displacement?
- Will the sub-project include any activities that might impact the health or safety of project staff or other people associated with the project?
- Will the sub-project involve the removal or alteration of any physical cultural resources?
- Will the proposed project take place in difficult to access areas?

Based on the results of the screening, the sub-project may be rejected (based on the negative list) or further assessed to determine the E&S risk (see Step 2).

Step 2. Risk assessment

After screening, risk assessment will be carried out for projects that are not rejected in step 1. The E&S specialists at each PIU will assess the magnitude of each risk/impact against criteria of probability and severity, as shown in Table 9. The probability of each risk/impact will be rated from "rare" (least probable) to "almost certain" (most probable), while the severity of each risk/impact will be rated from "negligible" (least severe) to "catastrophic" (most severe).

Table 9. Risk Assessment Matrix

Probability of risk/impact	**Severity of risk/impact**			
	Low	Moderate	Substantial	High
High	Moderate	Substantial	High	High
Substantial	Moderate	Substantial	Substantial	High
Moderate	Low	Moderate	Substantial	Substantial
Low	Low	Low	Moderate	Substantial

Based upon these ratings, each risk/impact will be assigned a rating of "low", "moderate", "substantial" or "high". The overall sub-project will take the highest risk rating for individual risks/impacts. For example, a project with three "low" risks and one "substantial" risk will be given the overall rating of "substantial".

Step 3. Determining Environmental and Social Documents to be Prepared

The E&S specialists at the PIU will determine which ESF documents are to be prepared, in line with the scale of the proposed activity and the level of risk. The documents to be prepared at the sub-project level may include one or more of the following:

(i) Initial Environmental Examination Report
(ii) Environmental & Social Impact Assessment (ESIA)
(iii) Environmental & Social Management Plan (ESMP), including measures for stakeholder Engagement and GRM and associated plans such as Community Health and Safety Plan including guidance on COVID-19 prevention; waste management plan; and traffic management plan
(iv) Resettlement Plan or/and livelihoods recovery plan
(v) Cultural Heritage Plan
(vi) E&S Good Practice Guidance

Preparation of documents at the subproject level will be in line with the following guidance:

- ✔ Sub-projects with an overall risk rating of "**low**" will only be required to prepare simplified versions of the documents.
- ✔ Sub-projects with an overall risk rating of "**moderate**" will be required to prepare documents for the applicable ESS(s), as shown in Table 10.
- ✔ Sub-projects with an overall risk rating of "**substantial**" will be required to prepare documents for the applicable ESS(s), as shown in Table 10 and will be subjected to enhanced monitoring and further due diligence.
- ✔ Sub-projects with an overall risk rating of "**high**" will be rejected.

Table 10. Documentation Requirements by Risk Rating

ESS	Risk rating			
	Low	Moderate	Substantial	High
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Good Practice Guide capturing appropriate measures	Initial Environmental Examination (IEE) / ESMP	ESIA and ESMP	N/A (application rejected)
ESS2: Labour and Working Conditions	Implementation of Project LMP, with GRM for project workers. Specific labour guidance will be included in the ESMP, as warranted. GRM for workers by contractors			N/A (application rejected)
ESS3: Resource Efficiency and Pollution Prevention and Management	**None**	Waste management plan as part of the ESMP	Waste management plan either as part of the ESMP or a separate document	N/A (application rejected)
ESS4: Community Health and Safety	Community health and safety	Community health and safety Plan, Traffic	Community health and safety plan, Traffic management plan,	N/A (application rejected)

ESS	Risk rating			
	plan as part of the Guidance	management plan, emergency response plan, infectious disease prevention and response procedure as part of the ESMP	emergency response plan, infectious disease prevention and response procedure as part of the ESMP	
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	RAPs and/or livelihoods recovery plan to be developed, consulted and disclosed if impacts covered under ESS5 are identified for the subproject, regardless of the level of risk.			N/A (application rejected)
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	**None**	Initial Environmental Examination / Environmental Management Plan	Environmental Impact Assessment / Environnemental Management Plan	N/A (application rejected)
ESS8: Cultural Heritage	**None**	Chance Find Procedures as part of the ESMP	Chance Find Procedures as part of the ESMP Cultural Heritage Plan (as needed)	N/A (application rejected)
ESS10: Stakeholder Engagement and Information Disclosure	Implementation of Project SEP, with GRM. Specific actions on stakeholder engagement will be included in the ESMP, as warranted, including specific details for GRM at the subproject site.			N/A (application rejected)

Step 4. Preparation of sub-project ESF documents

The E&S specialists at the national PIU will either prepare the documents or contract out the work. If the work is contracted out, the E&S specialists of the PIU will prepare the ToRs based on the results of the screening, site visits, and risk rating.

The Good Practice Guide will include measures to manage any possible E&S risks and will include as needed a community health and safety plan.

The Initial Environmental Examination is conducted where significant impacts are not likely. An IEE assesses the potential impacts, describes mitigation and management measures.

An Environmental and Social Impact Assessment assesses the potential E&S impacts of the proposed sub project, evaluates alternatives, and describes appropriate mitigation, management, and monitoring measures. The ESIA covers the entire life cycle of the subproject from construction to operations and closure.

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The ESMP includes measures to be taken during the implementation and operation of a project to eliminate the adverse environmental and social impacts, or to reduce them to acceptable levels. It will include a waste management plan, community health and safety plan, traffic management plan, emergency response plan, infectious disease prevention and response procedure as needed based on the risk assessed. A brief description of these plans is given below.

Waste management plan (WMP)

The generation of waste must be considered from the very beginning - during the planning contracting, construction and implementing phases of a subproject. Measures should be taken to minimize, manage, and dispose all types of waste that could be generated by all the project activities. A WMP where needed must be developed for subproject activities. It will include the management of solid, liquid, and gases wastes. It shall include measures to manage asbestos and other dangerous materials (electrical wastes, toxic chemicals and paints, etc.), that could be used or be generated during the demolition, construction, upgrade or renewal of installations and infrastructure; as well during implementing activities (paper, office materials, paints, etc.). The WMP must comply with the existing country legislation and regulations. The basic content should include:

- Objective of the WMP
- Description of waste generating activities and types of waste likely to be generated
- Measures for managing the waste generated
- Permitting requirements for the disposal of the different types of wastes
- Any special considerations such as avoiding burning of waste, community outreach or precautions in case of hazardous waste
- Monitoring requirements
- Adaptive management arrangements

The WMP will be included as part of the ESMP in the case of Moderate risk subprojects and either be a part of the ESMP or a standalone document for Substantial risk projects. The ESIA would identify if a separate WMP is required. Based on the WMP, the contractor would develop a site-specific waste management plan to be approved prior to construction by the PIU/supervising engineer.

Traffic Management Plan

The traffic management plan is meant to provide specific measures to be implemented to ensure proper traffic management while minimizing accident risks and other impacts to communities. The plan should consider amount of vehicular traffic, pedestrian use, access to sites, the uses of signs, and control mechanisms to allow the free, safe and orderly movement. The basic contents of a traffic management plan should include:

- Objective of the Traffic management plan
- Potential sites or traffic routes
- Traffic management measures to be implemented during construction with particular focus on sensitive receptors
- Any special considerations such as construction vehicles avoiding certain areas or times of the day, community outreach to make people aware of possible changes to current traffic patterns
- Implementation plan
- Monitoring requirements
- Adaptive management

The Traffic management plan requirements will be included as part of the ESMP. Based on this, the contractor would develop a site-specific a traffic management plan to be approved prior to construction by the PIU/supervising engineer.

Cultural Heritage Plan (CHP)

The purpose of the CHP is to avoid any negative impact or potential risks to the cultural or natural heritage of a nation where a project is implemented. The basic contents of a Cultural Heritage Plan should include:

- Subproject description
- Objectives of the Cultural Heritage Plan
- Legislative, International and World Bank Requirements. This can include any national laws or acts that govern or are relevant to the management of heritage, permitting requirements international Requirements, requirements under the ESF
- Status of area to be impacted
- Cultural heritage present
- Potential risks and impacts
- Measures to preserve cultural heritage
- Roles and Responsibilities:
- Timeline and resources
- Monitoring requirements
- Consultations undertaken and planned
- Chance Find Procedure

Emergency Response Procedure (ERP)

At the project planning stage, it is essential to determine the possible incidents and emergencies which could arise during construction works and plan accordingly. These may include:

- pollution incidents – spillages, failure of temporary works, vandalism, fire, etc.
- extreme weather events – heavy rainfall, flooding, high winds.
- Accidents.

The basic contents of an ERP should include:

- Objective of the Emergency Readiness Plan
- Description of the subproject and site characteristics
- Measures to be taken in case of an emergency by the contractor such as collaborating with local authorities and communities and developing procedures when an external emergency event is triggered
- Capacity building and trainings to be conducted by the contractor
- Implementation plan
- Monitoring requirements
- Adaptive management arrangements

The ERP requirements will be included as part of the ESMP. The contractor must have in place procedure for dealing with emergencies and how to communicate this procedure to all site staff before works commences. The Emergency Response Plan prepared by the contractor will cover both project-specific and emergencies in the communities This plan must be approved by the PIU/supervision engineer. Site staff responsible for taking action in emergencies must be:

- aware of their responsibilities.

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- trained in the appropriate response and must know how to use the necessary equipment such as spill control equipment and shut-off valves.

The occupational health and safety plan for the subproject would also have information on emergency response requirements.

Infectious Disease Prevention and Response Procedure (IDPRP)

The IDPRP will focus on methods to reduce of community exposure to diseases for potential communicable infectious diseases which could affect project workers such as COVID-19 and dengue. The IDPRP requirements will be included as part of the ESMP. The contractor will be responsible for developing and actively implementing an IDPRP. The IDPRP will include specific measures to (i) reduce the exposure and spread of diseases such as COVID-19 at the work site; (ii) evaluate measures in place to ensure the work site is not a source of contagion in the surrounding area; (iii) training schedule for workers on the IDPRP; and, (iv) identify potential healthcare facilities to ensure effective case management.

Community Health and Safety Plan (CHSP)

A CHSP addresses the risks and impacts of the project on the health and safety of affected communities during the project life cycle, including those who, because of their particular circumstances, may be vulnerable. Mitigation measures identified in the plan should comply with national legal requirements, Environmental, Health and Safety Guidelines (EHSGs) and Good International Industry Practice (GIIP). The CHSP requirements will be included as part of the ESMP. The basic content of a CHSP should include:

- Objectives based on the findings of an environmental and social assessment or similar document(s).
- Activities to be carried out, along with any specific project requirements needed to achieve the intended objectives. This should cover at a minimum
    - Safety of Services, including the provision of services to communities
    - Traffic and Road Safety, involving potential traffic and road safety risks to workers, affected communities, and road users throughout the project life cycle; vehicles or fleets of vehicles owned or leased for project purposes; and the use of project equipment that could have an impact on public roads or other public infrastructure
    - Community Exposure to Health Issues, including community exposure to waterborne, water based, water-related, and vector-borne diseases, and communicable and non-communicable diseases that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups
    - Security Personnel**,** addressing risks posed by direct or contracted workers providing security to safeguard its personnel and property to those within and outside the project site.
- Project requirements that the implementing entities follow to achieve objectives.
- An implementation schedule for the key activities, taking into account the planned timing of construction and other project activities.
- Institutional responsibilities for plan implementation.
- Cost estimate for plan implementation, including up-front investment costs and long-term recurrent costs. The plan also specifies funding sources for these costs.

The CHP can also cover traffic and road safety, management of hazardous waste and emergency preparedness and response.

Outlines for ESIA and ESMPs are given in Annex 10 and can serve as a guide for the preparation of these documents. To inform the ESMP preparation generic mitigation measures based on potential impacts are given in Table 11. These measures can be complemented with others that are considered relevant for the specific E&S potential impacts of the subproject.

Table 11. Potential Impacts and Mitigation Measures (Links risks and impacts to those described in Section 3.1)

Risk/Impact	Measure/Action			
	Avoidance	**Minimization**	**Mitigation**	**Offset/ Compensation**
Environmental Risks				
Damage to terrestrial habitat including loss of species	Exclude sub-projects that risk permanent loss of species and causes irreversible damage to the natural habitat	Prohibit disturbance of species and critical habitat	Incentivize conservation and/or restoration of critical and natural habitats and species	n/a
Impacts on marine habitats and coastal environment	Exclude sub-projects posing risks to coral reefs and the marine environment	Subject to monitoring capacity, introduce provisions and implement a system of penalties and fines intended to prevent damage to coral reefs	Implement protocols on safe navigation practices; deliver training; implement health and safety plan	**n/a**
Over Fishing	Exclude sub-projects that could lead to harvesting of species protected under national law, species with low reproductive rates	Implement measures to regulate seasons, areas, catch effort and/or gear; introduce quotas per household, community or cooperative	Improve habitat quality / area for harvested species	n/a
Sedimentation of nearshore coastal habitats	Exclude sub-projects that contribute to sedimentation affecting sensitive coastal habitats	Implement system of penalties and fines for activities contributing to sedimentation	Incentivize conservation and/or restoration of critical and natural habitats and species	n/a
Waste Management	Exclude sub-projects that fail to clearly propose measures to	Implement a system of penalties and fines for unauthorized disposal of solid waste	Implement protocols on disposal of solid waste; deliver staff training;	**n/a**

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Risk/Impact	Measure/Action			
	Avoidance	**Minimization**	**Mitigation**	**Offset/ Compensation**
	manage solid waste		implement health and safety plan	
Increase in organic matter in aquatic environment	Exclude sub-projects that fail to clearly propose measures to manage organic waste	Implement a system of enforceable penalties and fines for unauthorized disposal of organic waste.	Implement protocols on disposal of organic waste into marine environments; deliver staff training; implement health and safety plan	**n/a**
Noise pollution	Exclude sub-projects that generate noise beyond the recommended level	Noise will be restricted in areas with sensitive wildlife	• Mechanical equipment to be enclosed • Construction hours to be regulated	
Air Pollution	Exclude sub-projects that will lead to continuous air pollution		• Wet dry areas on a regular basis. • Cover spoils with plastic or other materials to minimize dust emission. • Remove spoils from the site as early as possible. • Conduct quantitative dust monitoring. • Workers to wear dust mask when dust becomes a nuisance.	
Road safety, traffic and community risk			• Inform the community at least two weeks in advance of the works • and discuss alternative route(s). • Install road directional signs	

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Risk/Impact	Measure/Action			
	Avoidance	Minimization	Mitigation	Offset/ Compensation
			• Store materials to avoid hindrance to traffic and pedestrian movement. • Complete works in a timely • manner. • Use flagmen to direct traffic	
Social Risks and Impacts				
Hazards to project workers	Avoid scheduling project activities during hurricane season, especially ones involving boat travel or visits to remote sites	Use well maintained vehicles; limit boat travel to essential journeys only; avoid travel at night.	Provide workers with personal protective equipment; provide field teams with safety, first aid and communication equipment; implement health and safety plan	Provide workers compensation insurance for all direct workers
Hazards to local people	Avoid scheduling travel or in-person gatherings during hurricane season	Minimize number of local people participating in sub-project activities (e.g. surveys, patrolling, etc.)	Provide training in health and safety to local people; provide personal protective equipment; implement health and safety plan	N/A
Physical, psychological or sexual abuse of project workers	Conduct background checks for new regional and national workers, in compliance with applicable local law. .	Sign Code of Conduct as part of workers contracts. Provide workers with workplace environment training. Ensure that GRM is able to address SEA/SH complaints.	Effective GRM; maintain a list of SEA/SH service providers and ensure that their services are available to project workers. Enforce the Code of Conduct and apply sanctions, as warranted.	N/A
Unfair treatment or discrimination of project workers	Provide project workers with copies of their employer's human resources policies.	Sign Code of Conduct as part of workers contracts. Provide managers with hiring / firing authority training in fair treatment / nondiscrimination	Effective GRM. Enforce the Code of Conduct and apply sanctions, as warranted.	N/A

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Risk/Impact	Measure/Action			
	Avoidance	Minimization	Mitigation	Offset/ Compensation
Security personnel engaging in unlawful or abusive acts against local people	Prohibit use of project funds to purchase weapons or support salaries of government security personnel; Conduct background checks for security personnel.	Provide training for security personnel in the appropriate use of force, and appropriate conduct towards communities. Sign Code of Conduct as part of workers contracts	Effective GRM, maintain a list of SEA/SH providers and ensure that their services are available to project workers. Enforce the Code of Conduct and apply sanctions, as warranted.	N/A
Transmission of COVID-19 or other communicable diseases	To the extent possible, organize virtual meetings and monitor remotely; comply with applicable (e.g. WHO) guidance and advisories when scheduling travel or in-person gatherings	Minimize number of visits / visitors to remote, rural communities; minimize number and size of in-person gatherings. Request written authorization from local authorities prior to visit a community.	Contractors to implement COVID-19 protocols. Provide project workers and local people with personal protective equipment, hand sanitizer and disinfectant; implement health and safety plan; deliver first aid/ CPR training.	N/A
Involuntary resettlement of people, due to physical and/or economic displacement	Assess different design alternatives to avoid impacts under ESS5.	Assess different design alternatives to minimize impacts under ESS5. Prepare RAP.	Follow the guidelines of the RPF to mitigate these impacts and prepare and implement a RAP prior to the start of works or any activities under the project with ESS5 impacts.	N/A
Restrictions on access to natural resources within a protected area or communally managed property	Use alternative area-based conservation measures, such as voluntary commitments.	Minimize area / activities covered by restrictions; exempt community members in highly vulnerable groups.	Develop and introduce restrictions in a participatory manner; establish and promote GRM; implement other measures identified in the RPF	Provide affected people with cash / in-kind compensation or alternative livelihoods

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Risk/Impact	Measure/Action			
	Avoidance	Minimization	Mitigation	Offset/ Compensation
Disturbance or damage to cultural heritage	Assess different design alternatives to avoid impacts under ESS8.	Assess different design alternatives to minimize impacts under ESS8. Include Chance Find Procedures in all contracts relating to construction or civil works.	Appy Chance Find Procedures.	N/A
Risk of elite capture and/or social exclusion	Implement actions included in the SEP to ensure that vulnerable groups are adequately identified and consulted on project activities.	Implement actions included in the SEP to ensure that vulnerable groups are adequately identified and consulted on project activities.	Find additional ways to involve stakeholders.	N/A
Impact on Persons with disabilities	Use of universal designs and measures to enhance their inclusion in project activities.			

4.4 E&S requirements for Policy actions, analytical studies and MSME selection

Under Sub-component 1.1 and 1.2, the UBEC project will support strengthening of regional and national policies, institutions, and capacity building and under Sub-component 2.2 analytical studies may be undertaken to inform the specific on-the-ground investment. The activities include drafting/review of policies, plans, strategies, and regulations and these can have direct or indirect E&S impacts when implemented through future investments. The E&S specialists of the PIUs should review the ToR for all such activities to address and incorporate E&S aspects in line with the requirements of the ESF to ensure the outcomes of the analytical work do not have negative E&S impacts. Some potential impacts are identified in Table 12. If the need for additional E&S information is identified which would require an environmental assessment then the E&S specialists should identify the scope of the assessment, draft the ToR and working with the Project Manager to ensure that the assessment is completed timely to inform the anaytical study.

Table 12. Potential environmental impacts from analytical work[9]

[9] This table is adapted from CROP Coastal Master and Marine Spatial Planning Annex E2 Situation Analysis and has been updated to reflect priority activities identified by sector for the UBEC Project.

Example of UBEC Activities	Pressures
Capacity study for internal tourism transportation services (land and marine)	• Input or spread of non-indigenous (invasive) species • Input of organic matter from diffuse and point sources • Introduction of non-synthetic compounds (e.g. heavy metals, organotins[10] and hydrocarbons) • Pollution (solid waste, micro-sized litter, fishing gear) • Potential collisions with coral reefs and slow-moving organisms
National policy for enhanced management of the yachting, cruise shipping and diving sectors	• Physical disturbance to the seabed • Input of nutrients from diffuse and point sources • Input of organic matter – diffuse sources and point sources • Introduction of non-synthetic compounds (e.g. heavy metals, organotins and hydrocarbons) • Potential collisions with coral reefs and slow-moving organisms
Legislation for expansion of fixed Fisheries Aggregating Devices (FADs) – offshore fisheries.	• Overfishing • Redistribution of fish stocks • Impacts on fish migration
Aquaculture policy to diversify jobs and investment Review the regulatory framework governing marine aquaculture activities	• Sustainability of the aquaculture sector • Increase in nutrients in aquatic environment • Pollution of the water bodies

Under Subcomponent 2.1, development services and matching grants to increase the productivity, job creation, and upgrade the capabilities of MSMEs and communities within blue economy value chains (e.g., tourism, fisheries and waste management) will be given. The MSMEs should be screened against the screening criteria laid out in section 3.3. Even though the project is strengthening the capability of the MSMEs, those selected should not be engaged in activities that are harmful to the environment. Those engaged in the negative list of activities or those undertaking activities with the potential to have High E&S risks should not be supported by the Project.

The grant program will be implemented and managed by the OECS Commission. The environmental and social specialist of the OECS Commission would be responsible for evaluating the eligibility of the MSMEs against the E&S criteria. The criteria for the selection of MSMEs will enhance social inclusion of the activities to be financed.

4.5 Stakeholder engagement and consultation at sub-project level

Consultations with key stakeholders, beneficiaries and affected people will be systematically carried out during preparation and implementation of each sub-project and other project activities, relying on guidance provided by the Project's SEP.

Meaningful consultations will be undertaken in a manner that provides affected communities and other stakeholders with opportunities to express their views on E&S risks and impacts of the sub-projects, and mitigation measures (including the GRM). Feedback from stakeholders should be documented and taken into account into the Project.

[10] Organotins are pollutants with tin that are used widely by industry as disinfectants, pesticides, and most frequently as biocides

When developing site specific ESMPs, they should include a section on stakeholder engagement including: (i) consultations for the preparation of site specific ESMP; (ii) stakeholder engagement to take place during implementation of the subproject; and, (iii) description of the GRM, including site-specific information for available channels and other adjustments. Any consultations at subproject level need to be well documented in the specific ESMP, including details on how stakeholder feedback was reflected and incorporated in the Project.

Consultations may take the form of one-on-one interviews, small-group consultations, public meetings or stakeholder workshops. Consultations may be in-person or virtual. Indeed, virtual meetings may be a necessity, as long as social distancing, travel restrictions and other measures to control transmission of the COVID-19 virus remain in place. For any possible face-to-face consultations, the project will adhere to proper physical distancing protocols, in line with the World Bank Technical Note, "Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings, March 20, 2020".

Whichever forms of consultation are used, attention will be given to ensuring that voices of men and women are both heard. In some contexts, this may require holding separate consultations for men and women. Stakeholder engagement will also be used to ensure that all vulnerable groups within the project area are identified and consulted.

Citizen engagement will be measured through beneficiary feedback surveys and the overall efficiency of the Project's Grievance Redress Mechanism to address and respond to grievances. The Project's intermediate results framework includes disaggregated measures of beneficiary satisfaction.

4.6 Implementation of the Sub-Projects

In addition to meeting the requirements of the ESMF, the PIU should ensure all sub-projects fulfil the national environmental requirements and all necessary permits are obtained.

Bidding Documents and Contracts

The ESMPs or Good Practice Guidance requirements for sub-projects along with any other contractor requirements should be incorporated by the PIU into bidding documents for the works. Contractors should be aware of their obligations upfront and should include the cost of implementing the E&S (including health and safety) requirements and conducting self-monitoring in their proposals. Contractors' contracts should also include all the E&S health and safety requirements, including compliance with ESMPs during construction for issues such as noise, traffic, labour and grievances by workers and communities and carrying out self-monitoring during implementation.

Purchase of materials should be only from approved sites. Some sub-projects might also generate construction waste that require appropriate environmental disposal. The identification of suitable sites for waste disposal, the environmental management necessary (compacting, re-soiling and re-vegetation, drainage control), and the associated transportation costs should be included in project design and cost estimates.

Construction Environmental and Social Management Plans

Based on requirements of the ESMPs, contractors are required to develop contractor ESMPs (CESMPs) for issues such as noise, traffic and waste. The purpose of the CESMP is to outline how during construction the contractor will avoid, minimize or mitigate effects on the environment and surrounding area based on the requirements given in the subproject ESMP. CESMPs are 'live' documents that should be reviewed and updated at regular intervals throughout the project life cycle. The CESMP should be approved by the Supervision Engineer.

Based on the specific requirements of the subproject ESMP, CESMP may be structured as follows:

- Introduction – General purpose, scope and structure of the document.
- Scope of work and sub-project description.
- Environmental requirements and controls – Policy and planning, environmental impacts, risks and mitigation, procedures for monitoring the construction processes against environmental objectives, pollution control measures, environmental risk register.
- Consents and permissions.
- Management plans – Specific management plans such as noise and vibration, traffic, labour, grievances etc.
- Health and safety procedures.
- Community engagement.
- Training.
- Incident reporting and investigation.
- Emergency response measures/plans.

Environmental Supervision during Construction

The PIU E&S specialists will be responsible for overall supervision of the works but a supervision engineer may oversee the daily on-site construction activities and ensure compliance with the contractor environmental and social management plans and E&S specifications. Where non-compliances are observed, the E&S specialists/supervision engineer will stop the works and work with the contractor to rectify the problem in coordination with the PIU. Chance Find Procedures (Annex 11) will be followed if tangible cultural heritage is encountered during civil works.

4.7 Project-level Grievance Redress Mechanism (GRM)

Objectives of the GRM

A grievance refers to an issue, concern, problem or claim, whether actual or perceived, that affects the physical, social and/or economic conditions of individuals and/or communities in the project area of influence. A GRM refers to methods and processes by which a redressal to a grievance is sought and provided. Its design can be specific to a project or it can build on existing institutions and processes whether they are formal or informal.

The project GRM is an effective tool for early identification, assessment and resolution of complaints. It provides an opportunity to voice complains or concerns, and to clarify and resolve misconceptions about project activities. It must be noted that this GRM covers grievances that relate to the impacts that the project may have on people as presented in the Stakeholder Engagement Plan (SEP), the Resettlement and Process Framework (RPF) and the Resettlement Action Plans (RAP).

Grievances that relate to project workers are to be handled by a separate Workers GRM which is included as part of the project's Labour Management Procedures (LMP) that has been prepared.

The GRM also specifies an individual who will be responsible for dealing with any Sexual Exploitation and *Abuse* and Sexual Harassment (*SEA*/*SH*) issues, should they arise.

The objectives of the project-level GRM are:

1. Receive, address, resolve and respond to all grievances emanating from the Project activities in a timely manner; and
2. Establish relationships of trust between Project staff and stakeholders.

The Grievance Redress Process

The GRM process identified in the ESMF is the same as the GRM described as part of the SEP and RPF and involves a number of steps summarized in Figure 6. Complaints or grievances are also assessed using a three-level classification systems, as follows: Level 1 (Low Risk), Level 2 (Moderate Risk) and Level 3 (High Risk). This risk assessment level and the associated response procedures are described in Table 13. As the level of risk associated with a grievance increases, responsibility moves from the national Environmental & Social (E&S) Specialists to the national Project Manager (PM) to the national Grievance Redress Committee (GRC).

The GRC may be established as an ad hoc committee during the life of the project and is to be chaired in each participating country by the Permanent Secretary of the ministry hosting the national PIU. The GRC will include representation by a Civil Society Member, the Project Manager, the E&S safeguard specialists, and other line ministries participating in the project, as appropriate.

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Figure 6. Six steps in the GRM Process

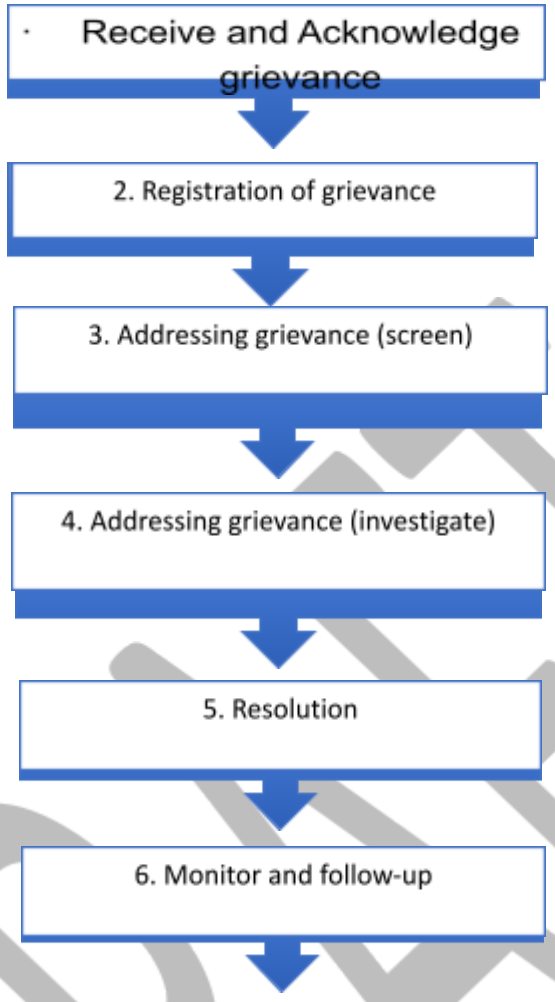


Table 13. Levels of grievances

Grievance Category	Description	Internal response	Responsibility
Level 1 Low risk	When an answer can be provided immediately. E.g., issues with the communication of information regarding the project.	Respond immediately to complainant. Record and report. It does not require internal consultation	Social Specialist
Level 2 moderate risk	One-off grievance that requires measured response and actions/ commitments to resolve complaint. E.g., dissatisfaction with response received at level 1; reports of health and safety concerns, complaints about project timeline issues, field staff or civil works.	Social specialist will review and classify the complaint. If it is classified as a level 2 grievance, the PM will investigate and respond in coordination with the E&S Specialists.	Project Manager
Level 3 High risk	Legal violations on the part of project staff or beneficiaries; Repeated, extensive and high-profile grievances that may	Social specialist will review and classify the complaint. If it is classified as a level 3 grievance, the PM will form a GRC that will be in	GRC

Grievance Category	Description	Internal response	Responsibility
	jeopardize the reputation of the project. E.g., cases of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), reports of fraudulent disbursement funds, failure to deliver promised inputs.	charge of addressing this level complaint. The GRC will provide advice on how to solve complaints within this level. For SEAH cases, a list of SEA/SH service providers will be kept available by the project. If an incident is reported through the GRM, a survivor-centered approach will be used. Any cases of SEA/SH brought through the GRM will be documented but remain closed/sealed to maintain the confidentiality of the survivor.	

GRM steps, roles, responsibilities and timeline

The three main actors for the implementation and functioning of the GRM are the national E&S safeguards specialists, the national PM and the national GRC. Roles and responsibilities for the GRM are described in the following table.

Table 14. GRM steps, roles, responsibilities and timeline

Steps	Role	Responsibilities	Timeline
1. Socialization / Publicization of the GRM Proper and timely notification about the GRM	Social specialist	● Inform the Project stakeholders about the available channels to submit grievances.	Throughout project cycle.
	Social specialist	● Coordinate the establishment of a signpost in project sites.	In place Before civil works start and maintained during construction, and after finalization.
	Social specialist	● Support and guide Project stakeholders wishing to file grievances (in person, by telephone, email, phone calls, or during public/community interaction).	Throughout project cycle.
2. Reception	Social specialist	● Receive grievances (including grievances submitted by phone, email, in person, and during public meetings)	Throughout project cycle.
3. Registration	Social specialist	● Record the grievance on the Grievance Information Form (SEP Annex 2). Add the date of reception and assign a registration number to the aggrieved person.	Immediately upon receipt of grievance. .
	Social specialist	● Categorize the grievances into level 1,2, or 3 for resolution. ● The Social specialist reviews the complaint, determines the grievance level and determines who will be responsible for its resolution. ● Grievances in levels 1, 2, and 3 will be monitored by the Social specialist.	Immediately upon receipt of grievance. receipt of grievance.

Steps	Role	Responsibilities	Timeline
	Social specialist	● Lodge the grievance in the Grievance Redressal Registration Monitoring Sheet (SEP Annex 4).	Immediately upon receipt of grievance.
	Social specialist	● Maintain hard copy and electronic records of grievance register and monitor any correspondence.	Throughout project cycle.
4. Acknowledgment	Social specialist	● Acknowledge the complaint (including providing a description of the process and estimated times to process the grievance). The E&S safeguards specialist will use SEP Annex 3 form.	Within 2-3 working days upon reception of grievance.
5. Investigation/ Resolution The investigation will include, but is not limited to, meetings with the grievant/ complainant, in site visits, meetings/ interviews with Project staff and collection of relevant documentation and other forms of evidence. Meeting deliberations and decision will be recorded on the Meeting Record Form (SEP Annex 5). Community representatives or representatives of the complainant will be allowed to sit in on these meetings.	Social specialist	● For level 1 complaints, investigate and evaluate the grievance and provide a response to the grievance.	Within 3-5 working days upon reception of complaint.
		● Provide proper and timely information on the solution worked out for each grievance for all levels.	Depending on the level of grievance, but no longer than within 10 working days of receipt of grievance
		● Inform the PM on level 2 and 3 grievances at the earliest plausible time.	Within 1 working day of registration of level 2 or 3 grievance.
		● Ensure the GRM procedure is being adhered to and followed correctly for all levels	Whenever a complaint is addressed.
		● Ensure all grievances are satisfactorily resolved in a timely manner.	Within 3-5 working days for level 1, 5-10 for level 2 and -10-30 for level 3.
	PM	● For level 2 complaints, in coordination with the Social specialist, investigate and evaluate the grievance and provide a response to the grievance	Within 5-10 working days upon receipt of complaint.
	Social specialist	● Support PM in handling level 2 grievances (including registration, communication with stakeholders, meetings organization, etc.)	Whenever a level 2 grievance is addressed
	GRC	● For level 3 complaints, investigate and evaluate the grievance and provide a response to the grievance	Within 15-30 working days upon reception receipt of complaint.
	E&S specialist	● Support GRC in handling level 3 grievances (including registration, communication with stakeholders, meetings organization, etc.). For meetings, the E&S safeguards specialist will fill the form in SEP Annex 5).	Whenever a level 3 grievance is addressed

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Steps	Role	Responsibilities	Timeline
	PM	● Inform the WB about all level 3 grievances as soon as possible.	No later than 5 working days after receiving the level 3 complaint
	Social specialist	● Once a resolution has been agreed and accepted, the complainant's acceptance will be obtained on the Disclosure Form included as SEP Annex 5. The Social specialist will provide this form to the aggrieved for any level 1,2 or 3 complaints.	Within 3-5 working days of resolution.
6. Monitoring and reporting	Social specialist	● Prepare the Quarterly Report on the GRM of the Project.	Quarterly
	PM and Social specialist	● Ensure the grievance mechanism procedure is being adhered to and followed correctly.	Throughout project cycle.
	PM and Social specialist	● Ensure all grievances (including those in level 3) are satisfactorily and timely resolved.	Throughout project cycle.
	PM and Social specialist	● Adjust the GRM process based on lessons learned during implementation.	Throughout project cycle.

Available channels to submit grievances

Complaints can be made in person, writing, verbally over the phone, emails or social media. The public, especially persons living in the project area of influence, must be informed about the project activities, as well as where they can submit their concerns, who will be responsible and the timeframe of the response.

The UBEC Stakeholder Engagement Plan document provides a number of GRM forms, including

- Grievance Information Form (GIF) – SEP Annex 2
- Grievance Acknowledgement Form (GAF) – SEP Annex 3
- Grievance Redressal Registration Monitoring Sheet – SEP Annex 4
- Meeting Record Form – SEP Annex 5
- Resolution Form – SEP Annex 6

The following contact persons may be reached by stakeholders with any questions, concerns, recommendations regarding the project at the level of each implementing entity (See Table 15). Upon staffing of all PIUs, the contact information will be updated to that of the Social Specialist or Project Manager in each national and regional PIU.

Table 15. Project contacts

Contact	Grenada	Saint Lucia	SVG	OECS Commission

Name	Candice Ramessar	Haward Wells	Dr. Resa Noel-McBarnett	David Robin (Mr.)
Title	Social Specialist	Director - National Integrated Planning and Programme Unit	Permanent Secretary, Ministry of Tourism, Civil Aviation, Sustainable Development and Culture	Ocean Governance and Fisheries Programme Director
Telephone	(473) 440-2731 592-604-2216	1-758 - 468 5590	784 457 1502	(758) 285 5459
Email address	digitalgrm@gov.gd	nippunit@gmail.com	mintourismsvg@gmail.com	david.robin@oecs.int
Physical Address	Ministry of Finance Building 5 St. George's, Grenada	Department of Finance 2nd Floor Financial Administrative Centre, Pointe Seraphine, Castries	2nd floor, NIS Building Kingstown	OECS Commission, Morne Fortune, P.O.Box 179, Castries, Saint Lucia

Available channels may be adjusted for the implementation of the GRM at the subproject level, with the inclusion of additional channels to submit grievances. All grievances at the national or local level will be recorded in the log and reported to the World Bank every 6 months.

GRM Appeals

An appeals process will be made available at a national and regional level for concerns that cannot be resolved directly by the GRM. Appeals should be submitted either by email to the regional or national PIU contact, or by contacting the national PIU by telephone or in writing.

Socialization/Publicization of the GRM

The regional and national social specialists will be responsible for coordination of information dissemination regarding the GRM. The social specialist will inform all project staff working for the OECS, national PIUs, the sub- projects including consultants and contractors, and the staff of the individual country Ministries of the project GRM and explain to them the procedures and formats to be used including the reporting procedures.

Awareness campaigns will be conducted targeting project stakeholders to inform them on the availability of the mechanism; various mediums will be used- as detailed in the SEP. The GRM will also be published on the OECS website, responsible Ministries in each participating country's website and the project website or Facebook page if there is one. A project site board will be erected on the sites of sub-projects indicating the existence of the mechanism and a phone number, email and address for further information. The GRM will be translated into local and colloquial expressions if determined to be needed.

Anonymity

Grievances can be submitted without providing the complainant's name or contact details with the understanding this might result difficult in some cases. If the grievance registration form is not available, the following key information should be noted:

a. The Project's name
b. Name of the person lodging the grievance (if provided)

c. Contact information of affected person (if provided)

Freedom from Retaliation

There will be no retaliation towards individuals seeking to resolve a grievance by means of the grievance redress mechanism.

OECS Grievance Redress Tool

An existing online Grievance Redress tool has been established by the OECS through the World Bank-supported Caribbean Regional Oceanscape Project (CROP) and will be updated to make specific reference to the UBEC.

The OECS Grievance Redress Mechanism is a complaint mechanism through which people and communities affected by projects and other activities being implemented through the OECS Commission may raise their concerns. Complaints can be reported online and addressed using the OECS Grievance Redress Mechanism Capture Form available at https://oecs.org/en/grievance-redress.

World Bank Grievance Redressal Service (GRS)

The complainant has the option of approaching the World Bank if they find the project-level GRM cannot resolve the issue. It must be noted that this GRS should ideally only be accessed once the project GRM has first been utilized without an acceptable resolution. World Bank Procedures requires the complainant to express their grievances in writing to World Bank office in Washington DC by completing the bank's GRS complaint form which can be found at the following URL link: https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service.

Email: grievances@worldbank.org

Fax: +1-202-614-7313

By letter: The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018NW,
Washington, DC 20433, USA

Addressing Project-related Sexual Harassment and Sexual Exploitation and Abuse (SEA/SH)

The project will follow the guidance provided by World Bank Technical Note "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Civil Works". This GRM will follow the official WB definitions described on the Technical Note.

Sexual Exploitation (SE) refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual Abuse (SA) is an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual Harassment (SH) is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

SH/SEA grievances can be received through any of the available channels and will be considered level 3 grievances investigated and addressed by the GRC. A list of SEA/SH service providers will be kept

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available by the Project. Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centred approach[11]. Any cases of SEA/SH brought through the GRM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The WB will be notified as soon as the Project Manager and the E&S specialists learn about the complaint.

Annex 5 includes a Code of Conduct that addresses procedures for referring SEA/SH incidents to the corresponding legal authorities, including for potential prosecution under the Criminal Code. If a SEA/SH-related incident occurs, it will be reported through the GRM, as appropriate keeping the survivor information confidential. Annex 2 of the LMP and SEP provides an initial mapping of SEA/SH services by country that will be updated annually to ensure the information is current.

4.8 Occupational Health and Safety (OHS) Procedures and Plan

Mitigation measures responding to the risks related to project labour and OHS conditions will be incorporated by standardized clauses in contract documents so that the contractors will be aware of their obligations under the Project. The national level PIUs will ensure compliance with the OHS procedures, including compliance by contractors. Employment Contracts will be prepared by each employer, in compliance with the policies and procedures laid out in the LMP.

Purpose of OHS procedures

The primary purpose of the OHS measures is the health and safety of any and all project workers at work. The measures also establish and define the authority for the implementation of the OHS plan and associated safety systems. These measures will be enforced on all activities of the PIUs, project contractors and project beneficiaries through contractual arrangements as is appropriate.

Scope of OHS Procedures/plan

OHS is concerned with the safety, health, and welfare of people at work. Safety is defined as “the well-being of project employees whilst at work or carrying out work duties”. OHS Management System is a set of standards, policies and guidelines that addresses project worker's safety, monitoring and evaluation of safety, worker's health, work and general environment.

OHS procedures

OHS procedures will be developed covering the following:

- Compliance with all national and international OHS legislation that are applicable to the participating country governments and the World Bank
- Compliance with the Environmental and Social Standards of the World Bank
- World Bank Environmental Health and Safety (EHS) Guidelines[12]
- Prevention of injury and ill health of all project workers
- Identification and assessment of hazards

[11] The survivor-centered approach is based on a set of principles designed to guide professionals-regardless of their role-in their engagement with survivors who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor’s interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor’s capacity to make decisions about possible interventions.

[12] http://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf

- Measures to manage the hazards including establishment of safety systems, processes and performance
- Continuous improvement of Safety Systems
- Prevention of use of faulty equipment or sub-standard equipment;
- Compliance with COVID-19 protocols
- Training and awareness
- Investigation and reporting of incidents. The World Bank guidance given in the Environment and Social Incident Response Toolkit (ESIRT) can be used as a guide to report incidents.

The Project will commit to safety considerations in all its activities and that of contractors, sub-contractors and beneficiaries.

The Project will provide systems, processes, procedures, the necessary safety equipment and gears such as personal protective equipment, and training for all project employees so that all activities are conducted in a safe environment. It will also develop and implement systems, processes, policies, and services in compliance with national and international legal requirements including industry standards and best practices in relation to safety.

Workers will be responsible, subject to their roles, for the maintenance of a safe environment including the assessment of risks and actions to minimize, mitigate, and manage risks. Workers at all levels have the authority to stop any activity they consider to be a danger to themselves or other workers, the public or the environment. Workers in this situation must rely on the project's GRM, which lays out procedures and timeframes for resolution. The LMP also requires incidents and accidents to be logged and reported by the PIU Project Manager to the Regional PIU and the World bank in line with the World Bank Environment and Social Incident Response Tool (See Annex 3 Guidance on Reporting of Incidents/Accidents).
There will be no retaliation to project workers for stop-work whistle blowing.

Each environmental specialist and social specialist attached to each PIU and the OECS Commission is responsible for the implementation and monitoring of the safety management systems of the project. The E&S specialists will develop guidelines, instructions and training and awareness materials to support the OHS measures and procedures.

The project will also ensure that all employees:
- Ascribe to the principle of not harming people;
- Understand that discrimination and SEA/SH will not be tolerated in the workplace;
- Are hired based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment;
- Receive training on Code of Conducts and OHS measures required under ESS2;
- Comply with the laws of the Countries at all times; and,
- Adhere to all health and safety measures as laid out in the ESS2.

The subproject ESMPs will include OHS provisions and based on the ESMP requirements an Occupational, Health and Safety Plan (OHSP) must be prepared by the contractor and approved by the E&S specialists of the PIU/supervision engineer prior to any works commencing on site. The OHSP must demonstrate the Contractor's understanding of how to manage safety and a commitment to providing a workplace that enables all work activities to be carried out safely. The OHSP must

detail reasonably practicable measures to eliminate or minimize risks to the health including COVID-19 protocols, safety and welfare of workers, contractors, visitors, and anyone else who may be affected by the operations. The OHSP must be prepared based on the requirements detailed in the ESMP and in accordance with the World Bank's EH&S Guidelines and the relevant country health and safety legislation.

OHS Policy Dissemination and Awareness

The OHS policy will be disseminated to all project workers, contractors and beneficiaries before start of contract. The information will be disseminated in various formats including an adapted and summarized version to be prepared by each of the PIU E&S specialists.

4.9 Capacity Building

Specific training and capacity building actions to strengthen the implementation capacity of the PIUs will be required to enable compliance with the project ESMF. This will include training for all PIU staff and contractors to develop, guide the preparation of and monitor the implementation of ESF instruments.

As reflected in the ESCP, training to be provided to PIU staff and Project contractors/workers on:

- ESF requirements including E&S documents
- Waste management
- Stakeholder engagement and GRM
- SEA/SH
- Occupational health and safety including emergency preparedness and response
- Infectious Disease Prevention and Response
- Community and worker health and safety

Where specific needs in relation to compliance with the ESSs are identified, the PIUs and contractors will be trained. This training could be classroom based, adopting appropriate protocols to prevent transmission of COVID-19, or it could be online, using materials available on the project website. Training sessions will be held in various formats, including workshops, lectures or hands-on activities in the field.

In addition to the capacity building that they will deliver directly, if any of the national PIUs determine that a contractor has inadequate legal or technical capacity to carry out key E&S assessment functions, they may require the contractor to include explicit measures related to capacity building. This could involve training for contractor workers and resources to employ or engage staff or consultants with relevant expertise, on, for instance, gender, anti-harassment or GRM.

4.10 Monitoring and Reporting

Monitoring during project implementation provides information about key E&S aspects of the project, particularly the E&S impacts and the effectiveness of mitigation measures. This allows the Project to evaluate the success of mitigation as part of project supervision and allows corrective action to be taken when needed. National PIUs will have ultimate responsibility for monitoring compliance with the E&S requirements. Annexes 3 and 4 have the formats for the monthly reporting on sub-project activities and the bi-annual reports that have to be submitted to the World Bank.

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4.11 Budget

The budget for the implementation of the ESMF will be Funded as part of overall Project management cost. Table 16 presents an indicative list of items to be covered and annual budget for the implementation of some of the items.

Table 16. Annual Budget for ESF implementation (USD)

#	Item	Grenada	St. Lucia	SVG	OECS Comm.	Total
1	Environmental Specialist	12,500.00	12,500.00	12,500.00	12,500.00	50,000.00
2	Social Specialist	12,500.00	12,500.00	12,500.00	12,500.00	50,000.00
3	Staff travel	5,000.00	5,000.00	5,000.00	5,000.00	20,000.00
4	Consultation (20 activities per year)	20,000.00	20,000.00	20,000.00	20,000.00	80,000.00
5	Information Production & Dissemination	10,000.00	10,000.00	10,000.00	10,000.00	40,000.00
6	Grievance Redress Mechanism	25,000.00	25,000.00	25,000.00	25,000.00	100,000.00
7	Trainings	TBD	TBD	TBD	TBD	TBD
8	Field visits by the PIU during sub-project preparation	TBD	TBD	TBD	TBD	TBD
9	Monitoring visits during subproject implementation	TBD	TBD	TBD	TBD	TBD

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ANNEX 1. PROGRAM DESCRIPTION – UBEC[13]

The UBEC Program[14] will be implemented as a Series of Projects (SOP) over a fifteen-year period (each project has a five-year implementation period) as per country demand. UBEC employs a multi-country approach for which the SOP will be used to support a multi-sectoral objective based on a common analytical diagnosis with multiple borrowers. The program provides an overarching framework for integrating investments in the tourism, fisheries, and waste management sectors around a common developmental goal. The Program includes interventions at the national and regional levels, which need to be integrated for a sustainable and effective approach for the small island states in the Eastern Caribbean region, as that will allow for the leveraging of economies of scale as well as a harmonized approach. Finally, the SOP will afford countries the opportunity to join when they are ready.

The expected projects in the series are:

- FY22: Grenada, Saint Lucia, Saint Vincent and the Grenadines and OECS Commission
- FY23-FY25: At least one additional country-level investment project each FY
- FY24 onwards: other Caribbean countries

Project Development Objective

The Project Development Objective is to strengthen the enabling environment for the Blue Economy, economic recovery and resilience of selected coastal assets in participating countries and at sub-regional level.

Project Components

The Project, under phase 1 of the SOP, is designed to stimulate economic recovery and support marine and coastal resilience in Grenada, Saint Lucia and Saint Vincent and the Grenadines by strengthening the sustainability and competitiveness of two critical, interconnected sectors – tourism and fisheries – and one underlying enabling infrastructure service, waste management. Growth and jobs in these areas have been heavily impacted by COVID. For full recovery of these economies, the Program will achieve its objectives by: (a) strengthening regional and national policies and institutional frameworks to bring back business and attract new investments; (b) scaling up innovative financing mechanisms aimed at enhancing employment, productivity and liquidity in the tourism, fisheries and waste management value chains through a regional MSME matching grants program and a regional climate-risk fisheries insurance scheme; (c) supporting investment in key infrastructure to de-risk and leverage private investment in blue economy activities, and build resilience; and, (d) adopting a contingency emergency response mechanism to promptly respond to future crises, including natural disasters. While these challenges are regional in nature, addressing them will require interventions at both regional and national levels. Coordinating actions among the three participating countries is critical to maximize synergies given their common dependence on tourism, their shared marine ecosystems and fishery resources, and their joint goal of reducing marine pollution.

[13] World Bank. 2021. Project Appraisal Document for The Series Of Projects Under The Unleashing The Blue Economy Of The Caribbean (UBEC) Program. Report No: PAD4167. September 8.

[14] The term “Program” in this document refers to a Series of Projects (SOP)

The Project will be financed with US$56 million in National IDA and Regional IDA credits and grants over a five-year period. In view of the regional approach being employed and the potential cross-country spillover benefits of project investments, Regional IDA funding has been mobilized to support financing of the Project. The Project is comprised of four components implemented in the tourism, fisheries and waste management sectors in three Eastern Caribbean countries and at the regional level through the OECS Commission.

COMPONENT 1: STRENGTHENING GOVERNANCE, POLICIES, AND CAPACITY BUILDING FOR KEY PRODUCTIVE SECTORS/AREAS (**US$10.8m).** A robust enabling environment that unlocks and sustains economic growth, job generation, environmental health, and climate resilience is critical to the viability and competitiveness of blue economy sectors. The COVID-19 pandemic has further underscored the urgency for these reforms and inter-regional cooperation to take place. This component targets regional and national policies, strategies, institutions, and capacity building by the public sector necessary to support economic recovery, jobs and improve management of natural assets contributing to regional marine environmental health and climate resilience.

Subcomponent 1.1: Strengthening Regional Policies, Institutions and Coordination - (US$1.5m) Harmonizing regulations and government procedures and boosting regional cooperation will allow for stronger economies of scale in the region. The OECS Commission plays a strategic role in strengthening regional integration and helping manage a regionally shared economic resource in the interest of the OECS countries. The regional approach is essential to address potential transboundary issues and increase the impact of national interventions. This is particularly important for transboundary fisheries, intra-regional tourism, and for coordination of initiatives to phase out single use plastics. This subcomponent will support: i) renewal of the OECS Common Tourism Policy to increase competitiveness based on a blue economy approach; ii) update of the OECS Regional Fisheries Policy and develop a regional strategy for Illegal, Unreported and Unregulated (IUU) fishing; and, iii) the use of Management Strategy Evaluation processes to enhance collaboration between resource managers and decision makers and to explore the trade-offs in performance of promising candidate management strategies through national, subregional and regional processes, and iv) the development of an OECS Waste Management Policy and Action Plan, and other regional policy reforms to address marine litter. This subcomponent, implemented by the OECS Commission, will also support the development and management of regional knowledge and data systems (e.g., regional blue economy data platform) and regional knowledge exchanges for increased regional integration and collaboration including with the private sector.

Subcomponent 1.2: Strengthening National Policies, Institutions and Capacity Building - (US$9.3m) This subcomponent is designed to strengthen governance and the regulatory framework of tourism, fisheries and waste management at the national level. It aims to support development and implementation of sector standards, policies, and operational guidelines[15] to support a transition to a blue economy in the participating countries. Activities will support policy measures aimed at

[15] Guidelines will focus on key areas including (but not limited to): 1) enhancing environmental protocols within new health, hygiene and safety standards, also strengthening the focus on climate adaptation/mitigation; 2) waste reduction and management with a focus on plastics and sanitation chemicals; 3) resource efficiency including circular economy tactics, water and energy usage; 4) nature-based solutions (e.g. climate change adaptation, destination stewardship and waste management); 5) sustainable procurement (e.g. local sourcing, fabrics that do not result in microplastic leakage, etc.); and 6) use of digital platforms.

increasing investments in value addition across sector outputs as well as upstream policies in the circular economy to reduce plastics pollution and enhancing domestic waste management. This subcomponent will also support capacity development to ensure the region has access to a skilled workforce as it recovers and grows in the context of increased competition post-COVID-19. Capacity building activities will include specialized skills targeting new tourism and fisheries products to reach domestic and export markets with a special emphasis on women; internet and social media marketing; greening operations to address climate adaptation and mitigation; adoption of health and safety protocols, among others.

COMPONENT 2: SCALE UP ACCESS TO FINANCE AND INFRASTRUCTURE INVESTMENTS IN THE BLUE ECONOMY (US$39.2m). This component includes a financing mechanism to enable private sector-led growth and direct investments into innovative economic activities that enhance ocean health and resilience leading to an increase in employment, greater GDP contribution from ocean assets, and broader uptake of climate resilient approaches. This component will finance: (i) a regional matching grants program to foster the recovery and the resilience of MSMEs, ensure business continuity, create jobs and mitigate the socio-economic impacts of COVID19; and a fisheries risk insurance scheme to support fishers' livelihoods against extreme climatic events; and (ii) scale up coastal infrastructure investments in tourism, fisheries and waste management that are sustainable, technologically advanced and climate resilient. The ongoing pandemic has amplified the need for resilient and adaptive infrastructure that can operate efficiently during singular and multiple system shocks, including natural disasters.

Subcomponent 2.1: Scale Up Access to Finance to MSMEs and Fisher Communities (US$8.4m)

2.1 (a): Regional MSME matching grants program (US$5.5m): This subcomponent is designed to finance business development services (BDS) and matching grants to increase the productivity, job creation, and upgrade the capabilities of MSMEs and communities within blue economy value chains (e.g., tourism, fisheries and waste management). The Regional MSME matching grants program seeks to fund activities that will: (a) support tourist operators, fish workers, service providers, and coastal communities to increase employment, productivity and innovation while ensuring sustainable management of the marine and coastal natural resources; and (b) enhance market linkages and business relations for target beneficiaries with other value chain actors. The matching grants will be provided at the individual firm level (Window 1) and at the value chain group level (Window 2). Specific attention will be given to assisting youth and women owned MSMEs to be successful, and those that work within regional supply chains to address and build business ideas out of critical regional challenges such as plastics or sargassum. Eligibility criteria will ensure MSMEs with commercial viability adopt an approach of building back better, respecting the integrity and resilience of the regional coastal ecosystems. The program will be managed at the regional level by the OECS Commission to foster greater regional collaboration. Details pertaining to management of the program will be included in the Project Operational Manual.

2.1.(b): Expansion of the regional climate-risk insurance for fisheries (US$2.9m): the Caribbean Ocean and Aquaculture Sustainability Facility (COAST) fisheries risk insurance scheme is a hydrometeorological and climate risk insurance product designed to promote food security, enhanced livelihoods, resilient fisheries, and improved fisheries management in the Caribbean. The COAST insurance product supports governments' efforts to rapidly channel financial resources to

those fishers most impacted by extreme weather events, by providing governments with funding to cover the most immediate needs of fishers following a natural disaster or extreme weather event. COAST enhances inclusiveness by covering, among others, fish vendors and processors, most of whom are women. Through formal registration in the scheme, these women, for the first time, will be insured to support their livelihoods. On a pilot basis, the Caribbean Catastrophe Insurance Facility (CCRIF) SPC has made the COAST product available to two countries, Grenada and Saint Lucia, for the 2019/20, 2020/21 and 2021/22 policy years. This Project UBEC will now extend this risk insurance product to SVG and continue to support Grenada and Saint Lucia to scale up efforts in the application of this insurance product.

Subcomponent 2.2: Scale up Infrastructure Investments for Economic Resilience and Ocean Health (US$30.8m)

Direct investments in resilient coastal infrastructure (US$30.8m): This activity will target coastal infrastructure investments that generate jobs in the short term and lay the foundation for long-term recovery through investments that help build a low-carbon, less polluting, more sustainable and resilient coastal economy that is adaptive to climate change. The countries either have existing coastal and marine spatial plans or strategies of acceptable quality with priority investments identified or have undertaken assessments that list priority actions for more resilient coastal infrastructure. These public investments aim to de-risk private investment by improving, restoring or preserving healthy and functioning marine ecosystems, and support measures to prevent further degradation of key marine and coastal hotspots. All infrastructure works will be supported by pre-feasibility studies, climate risk screening, cost-benefit analyses, environmental and social impacts, and public consultations, as required.

Activities will be selected based on the following criteria: a) potential for job creation; b) potential economic impact in the short term; c) sustainability and resilience; and d) potential for catalyzing private sector investment. Example of activities to be financed will include: i) enhancements of marine-based tourism infrastructure (e.g. yachting, mooring buoys, visitor information, signage, access) to improve visitor experience and generate value from marine and coastal natural assets; ii) targeted investments in waste collection, segregation, recycling and disposal infrastructure to improve solid waste management systems and reduce plastics pollution; iii) pre- to post-harvest fisheries improvements to increase the value of fish products (such as small-scale solar powered processing and cold storage facilities), and investments in aquaculture to support food security and economic diversification for local communities; and, iv) restoration of nature-based infrastructure for coastal resilience (e.g. replanting coastal mangroves) and adoption of innovative technologies to strengthen monitoring and surveillance of the marine ecosystems.

COMPONENT 3: CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC) (US$0). The objective of this component is to support participating countries to be ready to rapidly respond in the event of a future eligible crises or emergencies defined as “an event that has caused, or is likely to imminently cause, a major adverse economic and/or social impact associated with natural or human-made crises or disasters.” Such events may include a disease outbreak, such as the COVID-19 pandemic, and natural disasters. Following an eligible crisis or emergency, the Borrower may request the World Bank to re-allocate project funds to support emergency response and reconstruction. This component would draw from the uncommitted loan resources, as defined in the Financing Agreement for each country, under the Project from other project components (within each

country's financing envelope) to cover the emergency response.[16] The Project will follow a dedicated CERC Manual that will describe how the Component would be triggered and include clear step-by-step guidelines on disbursement.

COMPONENT 4: PROJECT MANAGEMENT, COMMUNICATION AND REGIONAL COORDINATION (US$6m)

The objective of this component is to ensure effective project implementation, monitoring of activities and final project evaluation. The component will finance goods, consulting and non-consulting services, training and operating costs of the Project Implementation Units (PIU) in each country for expenditures related to project activities, including: (a) project coordination and management; (b) compliance with environmental and social standards; (c) monitoring, evaluation, and impact assessment; (d) data collection; fiduciary administration, accounting and financial and technical audits, procurement processes; (f) stakeholder and citizens' engagement, including application of a grievance redress mechanism; (g) communications; and (h) regional coordination. The costs associated with management and coordination at the regional level by a Regional IDA grant managed by the OECS Commission.

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[16] Refer to the CERC Annex of the Project Operations Manual (POM) for detailed information on eligible crisis or emergency and procedure specific information.

ANNEX 2. CONTINGENT EMERGENCE RESPONSE (CERC) GUIDANCE

Introduction

This CERC Annex in the ESMF serves as an instrument specifically addressing Component 3 of the UBEC Project which is the Contingent Emergence Response Component. The CERC is guided by the CERC Annex of the Project Operations Manual which provides the framework for CERC activation and approved activities that will be coordinated and implemented according to World Bank and national policies and procedures agreed. This CERC Annex provides additional information on E&S requirements in case of activation of the CERC.

Objective

This CERC section outlines a screening process built around the positive (eligible) list for key E&S risks. This is linked to identifying institutional arrangements for oversight of any required additional E&S due diligence and monitoring. Implementing agencies can use the existing institutional structure that has been established under the UBEC Project. All activities financed through the CERC are subject to the WB's Environmental, Health and Safety (EHS) Guidelines.

This annex in particular

- Provides positive and negative list of CERC related activities.
- Defines procedures to assess the E&S impacts of these activities.
- Sets out measures/plans to reduce, mitigate and/or offset adverse impacts.
- Defines implementation arrangements of CERC E&S issues.

CERC Activation

The nature of activities to be financed under CERC are event and demand driven and should be consistent with CERC's purpose of providing short-term bridge financing for immediate recovery needs according to eligible emergency. There is no limit to the number of times the CERC may be activated, but the procedures described should be followed for each activation.

An Eligible Crisis or Emergency is defined by the World Bank as an event that has caused or is likely to imminently cause a major adverse economic and/or social impact associated with natural or man-made crises or disasters. This may include, inter alia: (i) hurricane: (ii) earthquake; (iii) storm; (iv) storm surge and strong waves; (v) tornado; (vi) tsunami; (vii) volcanic eruption; (viii) flood; (ix) landslides; (x) forest fires; (xi) drought; (xii) severe weather; (xiii) extreme temperature; (xiv) high winds; xv) any natural disaster; and (xvi) health emergencies.

An official letter will be sent from the Government to the World Bank requesting to activate the CERC along with the activation package that includes the following information:

a. Explicit request for CERC activation.
b. Explicit endorsement of the evidence provided for the emergency.
c. A brief summary of nature of the emergency and its impacts, and confirmation of causal relationship between the event and the need to access the funding through CERC.
d. As an attachment [if not shared previously]: the declaration of emergency or equivalent evidence as agreed in the CERC Manual (official declaration, UN Agency report, statement of facts on the imminent threat issued by international agency, etc.)
e. Total amount requested through the CERC, the amounts and disbursement categories for reallocation to the CERC, and the respective adjustment to component costs.
f. Rapid Needs Assessment

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g. Emergency Action Plan (EAP)

The Government will prepare the EAP, which explains what will be financed under the CERC (the activities), the emergency and its impacts, how much it will cost, who will implement, and how it will be implemented and monitored. For the E&S aspects the EAP will include:

- Rapid Assessment of potential Environmental and Social risks and impacts of activities to be financed by CERC.
- Preliminary Mitigation measures and instruments that will need to be adjusted/developed.
- Institutional arrangements.
- Grievance Redress Mechanism
- Monitoring and Reporting
- Annexes (e.g. positive and negative lists)

If deferral of E&S completion is agreed upon CERC activation, it should include an action plan for such completion.

The Government may seek support from the Bank to select a list of activities for financing under the CERC based on (i) the positive and the negative list outlined in the CERC Annex to the ESMF, and (ii) priorities identified at the Rapid Needs Assessment of the emergency's impact. The Government may request WB technical assistance to undertake the activities (e.g., Rapid Needs Assessment and other related preparatory activities to support CERC activation and implementation activities). This request can be made directly to the Country Director in a written form via letter or electronic communication.

In no case shall the activities for financing under the CERC exceed the E&S risk of UBEC or trigger any new ESS.

The following list of goods, services and works will be deemed as eligible under the CERC[17].

CERC Positive List

The positive list of works, services, non-consulting services and goods eligible for CERC component is shown in Table A-1 below.

Table A-1. Positive list of goods, services and works

Item
Goods
● Medical equipment and supplies ● Non-perishable foods, bottled water and containers ● Tents for advanced medical posts, temporary housing, and classroom/daycare substitution ● Equipment and supplies for temporary housing/living (gas stoves, utensils, tents, beds, sleeping bags, mattresses, blankets, hammocks, mosquito nets, kit of personal and family hygiene, etc.) and school ● Gasoline and diesel (for air, land and sea transport) and engine lubricants ● Spare parts, equipment and supplies for engines, transport, construction vehicles

[17] These are based on the draft CERC Manual Table 3, positive list of goods, services and works.

- Lease of vehicles (Vans, trucks and SUVs)
- Equipment, tools, materials and supplies for search and rescue (including light motor boats and engines for transport and rescue)
- Tools and construction supplies (roofing, cement, iron, stone, blocks, etc.)
- Equipment and supplies for communications and broadcasting (radios, antennas, batteries)
- Water pumps and tanks for water storage
- Equipment, materials and supplies for disinfection of drinking water and repair/rehabilitate of black water collection systems
- Equipment, tools and supplies for agricultural, forestry, and fisheries
- Feed and veterinary inputs (vaccines, vitamin tablets, etc.)
- Construction materials, equipment and industrial machinery
- Water, air, and land transport equipment, including spare parts
- Any other item agreed to between the World Bank and the Recipient (as documented in an Aide-Memoire or other appropriate formal Project document)
- Temporary toilets
- Groundwater boreholes, cargos, equipment to allow access to site, storage units

Services

- Consulting services related to emergency response including, but not limited to urgent studies and surveys necessary to determine the impact of the disaster and to serve as a baseline for the recovery and reconstruction process, and support to the implementation of emergency response activities
- Feasibility study and technical design
- Works supervision
- Technical Assistance in developing TORs, preparing Technical Specifications and drafting tendering documents (Bidding Documents, ITQ, RFP).
- Non-consultant services including, but not limited to drilling, aerial photographs, satellite images, maps and other similar operations, information and awareness campaigns
- Non-consultant services to deliver the activities described in the “Goods” section of this table (e.g., debris removal, dump trucks, drones survey)

Works

- Repair of damaged infrastructure including, but not limited to water supply and sanitation systems, dams, reservoirs, canals, roads, bridges and transportation systems, energy and power supply, telecommunication, and other infrastructure damaged by the event
- Re-establishment of the urban and rural solid waste system, water supply and sanitation (including urban drainage)

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● Repair of damaged public buildings, including schools, hospitals and administrative buildings ● Repair, restoration, rehabilitation of schools, clinics, hospitals ● Removal and disposal of debris associated with any eligible activity.
Training
● Conduct necessary training related to emergency response including, but not limited to the Implementation of EAP. ● Training on rapid needs assessment and other related assessments.
Emergency Operating Costs
● Incremental expenses by the Government for a defined period related to early recovery efforts arising as a result of the impact of an eligible emergency. This includes but is not limited to costs of staff attending emergency response, operational costs and rental of equipment.

CERC Negative List

The following uses of UBEC resources by the CERC are prohibited:

i. Uses of goods and equipment involving forced labour, child labour, or other harmful or exploitative forms of labour
ii. Purchase and use of formulated projects that fall in the World Health Organization classes IA and IB or formulations of products in class II if they are likely to be used by, or be accessible to, lay personnel, farmers or others without training, equipment and facilities to handle, store and apply these products properly.
iii. Funding salaries or salary supplements of government security personnel.
iv. Financing of elections or election campaigning.
v. Purchase of firearms or other weapons.
vi. Activities that contravene local laws related to purchase and consumption of tobacco, alcoholic beverages and other drugs.
vii. Manufacture of alcohol for local consumption and/or cultivation of crops for this purpose.
viii. Activities carried out in relation to the adjudication of lands under dispute.
ix. Purchase of land.
x. Activities that have potential to causes adverse impacts to critical habitat.
xi. Activities that lead to conversion, deforestation or degradation of natural forests or other natural habitats, including, among others, conversion to agriculture or tree plantations.
xii. Activities affecting protected areas (or buffer zones thereof)
xiii. Activities related to commercialization of illegal timber and non-timber forest products.
xiv. Construction and/or restoration of religious buildings.
xv. Removal or alteration of any physical cultural heritage property (includes sites having archaeological, paleontological, historical, religious or unique natural values).
xvi. Uses of goods and equipment for military or paramilitary purposes
xvii. Uses of goods and equipment in response to conflict, in any area with active military or armed group operations

Potential Environmental and Social Impacts

The proposed positive list of activities and works as identified in Table A-1 are likely going to be of moderate scale that will not trigger new ESS. The expected negative impacts will be managed based on the existing ESS instruments and will be supervised and monitored by the E&S specialists of the PIU. The activities will be implemented under emergency situation as paragraph 12 of the IPF Policy applies once the CERC is triggered, and will need prompt actions from E&S specialists to ensure E&S protection measures are included and implemented through ESMPs, as warranted. The ESMPs will be prepared in line with the UBEC ESMF requirements and guided by the WBG Environment, Health and Safety (EHS) Guidelines.

The Implementing Agency, through the E&S specialist, will identify based on the activities and works proposed in the EAP, the potential E&S negative impacts, and the studies or plans required for their management.

The Implementing Agencies, contractors, other workers and labourers who will be supervising, working, managing and monitoring civil works or other works under emergency situation will be subjected to the project Code of Conduct, and must observe and prevent all forms of Sexual Exploitation and *Abuse* and Sexual Harassment (*SEA*/*SH*), forced labour, child labour and other harmful or exploitation forms of labour in the workers' camps or surrounding communities.

Environmental and Social Process

The implementation of the CERC will be consistent with ESMF requirements as follows:

Screening

The ESMF provides the procedure for screening and defines how screening should be done for sub-projects. Similar process will be followed for CERC sub-projects.

ESIA/ESMP

Depending on sensitivity, issues and potential impacts and risks identified during the screening, the E&S specialists of the PIU shall identify if a more detailed E&S assessment is required (e.g., E&S Impact Assessment) and what E&S instruments (e.g., ESMP, RAP) shall be prepared for the CERC activities/sub-project. The CERC ESMP should provide description of the works/activities, associated impacts, proposed mitigation measures, implementers or key players and associated costs.

The contractors shall ensure occupational health and safety (OHS) measures and guidelines, are incorporated and considered in all activities during implementation. If land acquisition is required, an abbreviated RAP will be prepared. Consultations with local authorities and communities, including the Project Affected People (PAP), shall be undertaken in line with the UBEC SEP. The World Bank E&S specialists shall oversee all E&S issues. The budget for implementation of E&S instruments, including implementation of the GRM shall be included and agreed as part of the instruments.

Review and Approval processes

The prepared ESMP/ESIA and Abbreviated RAPs shall be subjected to review and approval. These documents will be reviewed by both the PIU and the World Bank.

Implementation

After approval, ESMP and other E&S instruments, will be implemented in accordance with the agreed implementation arrangement. The E&S specialists of the PIU will be the main supervisor to the

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contractors implementing the sub-projects. The World Bank will also monitor through supervision missions.

Institutional Arrangements

The Ministry of Finance & Economic Planning, Sustainable Development & Information Technology in SVG; Ministry of Finance, Economic Growth, Job Creation, External Affairs and the Public Service in SLU; and Ministry of Finance, Planning, Economic Development and Physical Development in GRE will serve as the Executing Agency for the CERC in close collaboration with the national UBEC Project Implementation Unit (PIU). The National Emergency Management Office agency or any other department as decided by executing agency in agreement with the Bank will serve as the Implementing Agency for Component 3 on the CERC. The Implementing Agency, with the support from executing agency and PIU will be responsible for the preparation of the EAP and its day-to-day implementation, including E&S compliance.

The Implementing Agency (with support from the executing agency and PIU) will prepare the package to trigger the CERC after the declaration of disaster, and will ensure that the latest impact assessment, situation reports, and the list of goods and works are included in the EAP.

The relevant Line Ministries will provide the requisite technical assistance to the Implementing Agency as related to the finalization of procurement bidding documents and the technical supervision of the post recovery and reconstruction works. The Line Ministries will provide technical inputs for terms of references (ToRs), invitations to quote (ITQs), and any other procurement documents as well as provide technical specifications for goods and participate in evaluation of bids.

A final evaluation report will be prepared by the implementing agency once all emergency activities are finished and submitted to the World Bank. The implementing agency with support of PIU and the Bank will be responsible to ensure adequate closing within six months of end of EAP implementation date. This will include submission of audit reports and any other agreed technical, fiduciary and E&S reports.

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ANNEX 3. FORMAT FOR E&S MONITORING AT SUB-PROJECT LEVEL

Environmental and Social Monitoring Report
[Month]

A. General Information on subprojects covered such as location, start date, etc. Please include all subprojects covered in this reporting period

B. Status of Implementation

ACTIVITY	STATUS

C. Environmental and Social Compliance
Describe the challenges faced and the measures taken to overcome the challenges to ensure E&S compliance.

Provide a summary of the COVID-19 prevention measures taken at subproject site and stakeholder engagement actions]

D. Status of the Grievance Redress Mechanism
Provide a summary of GRM socialization and implementation. And complete the following table

Grievance	Date received	Status	Resolution	Date closed	Comments

E. Lessons learned

F. Annexes
Screening forms completed for sub-projects

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ANNEX 4. BI-ANNUAL PROJECT PROGRESS REPORTING TEMPLATE

UNLEASHING THE BLUE ECONOMY OF THE CARIBBEAN (UBEC) – P171833
Monitoring report on Environmental and Social Standards
Country: [official name of the country reporting]
Period: [State period of reporting]

SECTION I – PROJECT PROGRESS

SUMMARY OF OVERALL PROJECT PROGRESS -In relation to the implementation of the Environmental and Social Standards relevant to the project and in accordance with the project Environmental and Social Commitment Plan (ESCP)

SECTION II - ESCP

	MATERIAL MEASURES AND ACTIONS	**DETAILS**
MONITORING AND REPORTING		
A	**REGULAR REPORTING** The project has been submitting bi-annual monitoring reports on the environmental, social, health, and safety (ESHS) performance and the implementation of the ESCP? ☐Yes ☐No	If YES: provide dates of previous Reports If NO, please briefly explain.
B.	**INCIDENTS AND ACCIDENTS** Any incidents and/or accidents during the reporting period? ☐Yes ☐No	If YES, please provide details on: (i) the incident/accident, (ii) when and how was brought to the attention of the Association; (iii) immediate measures taken or that are planned to be taken to address it, and (iv) any information provided by any contractor and supervising entity, as appropriate.
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		

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	MATERIAL MEASURES AND ACTIONS	DETAILS
1.1	**ORGANIZATIONAL STRUCTURE** Does the project have a qualified environmental specialist in place? ☐Yes ☐No Does the project have a qualified social specialist in place? ☐Yes ☐No	If YES: provide dates on which they were hired. If NO, please briefly explain
1.2.	**MANAGEMENT OF TOOLS AND INSTRUMENTS** a) Are E&S instruments integrated into the POM? ☐Yes ☐No b) Have ESAs and ESMPs been prepared for subprojects and other relevant Project activities, in accordance with the ESMF? ☐Yes ☐No	a) If YES: provide date of completion. If NO, please briefly explain. b) If YES: please provide detail on how many were prepared, dates and status of implementation. If NO, please briefly explain.
1.3.	**MANAGEMENT OF CONTRACTORS** a) Are relevant aspects of the ESCP and the ESSs into the procurement documents? ☐Yes ☐No b) Do 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 contract?	a) Briefly explain in which contracts and what aspects are included. b) Briefly explain status of compliance.
1.4	**CONTINGENT EMERGENCY RESPONSE** Have the CERC been activated? ☐Yes ☐No	If YES, please provide date of activation and status.
ESS 2: LABOUR AND WORKING CONDITIONS		

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	MATERIAL MEASURES AND ACTIONS	DETAILS
2.1	**LABOUR MANAGEMENT PROCEDURES** a) Do project workers have knowledge of the LMP including the worker GRM and the code of conduct of the project? ☐Yes ☐No b) In the second column, mention how many workers by category: direct, contracted, community workers, primary supply workers (if any) c) In the second column, mention how many female workers in proportion to male workers.	a) Briefly explain b) Direct workers: Contracted workers: Community workers: Primary supply workers: c) Female workers: Male workers:
2.2	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** Were any grievances captured in the grievance log for the reporting period? ☐Yes ☐No	If YES, please give the number of grievances and briefly explain the content. Include the updated grievance log for project workers as an Annex to this report.
2.3.	**OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES** a) Are specific OHS measures included in the respective ESMPs? ☐Yes ☐No b) Have OHS measures been incorporated into bidding documents and contracts with consulting firms, contractors and supervision firms? ☐Yes ☐No c) Do consulting firms, contractors, and supervision firms implement OHS measures for each work site/activity? ☐Yes ☐No	For each question: If YES: provide details. If NO, please briefly explain.
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		

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	MATERIAL MEASURES AND ACTIONS	DETAILS
	MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS Are waste management measures included in the ESMPs developed? ☐Yes ☐No Have waste management been incorporated into bidding documents and contracts? ☐Yes ☐No Do the contractors require permission to dispose waste at the disposal site? ☐Yes ☐No	If Yes, list for which sub-projects and provide details
ESS 4: COMMUNITY HEALTH AND SAFETY		
4.1	**COMMUNITY HEALTH AND SAFETY** Are community occupational health and safety measures adopted in subproject sites? ☐Yes ☐No	Briefly explain status of implementation of these measures at subproject sites.
4.2.	**SEXUAL EXPLOITATION AND ABUSE (SEA) AND SEXUAL HARASSMENT (SH)** a) Is a list of services for victims of SEA/SH available? ☐Yes ☐No b) Did all workers sign the code of conduct? ☐Yes ☐No c) Is the GRM able to address SEA/SH grievances? ☐Yes ☐No	Briefly explain status of implementation of these measures.
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		

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MATERIAL MEASURES AND ACTIONS		DETAILS
5.1.	**RESETTLEMENT PLANS** Have RAPs been developed in line with the RPF? ☐Yes ☐No	Please provide details on RAPs, including, inter alia: number of PAPs, status of implementation, consultations, challenges.
5.2.	**WILLING SELLER / WILLING BUYER TRANSACTIONS** Have any "willing buyer-willing seller" transactions taken place in the context of the Project? ☐Yes ☐No	If YES, please provide details of the transaction, especially evidence that it was voluntary and informed.
5.3.	**LAND DONATION** Has any land donation taken place in the context of the Project? ☐Yes ☐No	If YES, please provide details of the transaction, especially evidence as set forth in 5.3. of the ESCP.
	GRIEVANCE MECHANISM Have any grievances related to impacts covered under ESS5 been received through the GRM? ☐Yes ☐No	If YES, please give the number of grievances and briefly explain the content. Include the updated grievance log for ESS5 as an Annex to this report.
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES		
6.1.	**BIODIVERSITY RISKS AND IMPACTS** During the risk assessments were any risks identified that could have negative impacts on terrestrial and marine ecosystems/habitats? ☐Yes ☐No Have mitigation and management measures for those biodiversity risks been included in the ESMPs? ☐Yes ☐No	If YES, please summarize
ESS 8: CULTURAL HERITAGE		
8.1.	**CHANCE FINDS** Have a "chance find" taken place while implementing subprojects? ☐Yes ☐No	If YES, please briefly explain procedure used, dates and current status.
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		

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MATERIAL MEASURES AND ACTIONS		DETAILS
10.1.	**STAKEHOLDER ENGAGEMENT PLAN** Any new consultation during this reporting period? ☐Yes ☐No Have other types of stakeholder/citizen engagement taken plan in the reporting period? ☐Yes ☐No	If YES, to a) and or b), please provide dates, purpose, places and topics. Also, explain how feedback from stakeholders influenced the decision-making of the project. Include an stakeholder engagement report as an Annex to this report for more details on implementation of the SEP.
10.2.	**PROJECT GRIEVANCE MECHANISM** Were any grievances captured in the grievance log for the reporting period? ☐Yes ☐No	If YES, please give the number of grievances and briefly explain the content. Include the updated grievance log as an Annex to this report.
CAPACITY SUPPORT		
	TRAINING Any new training activities to project workers and contracted workers during this reporting period? ☐Yes ☐No	If YES, please provide dates, places, number of participants and topics. Also, explain how these trainings are building capacity to manage environmental and social risks. You may include a brief report on training activities as an annex to this report.

SECTION III – CONTEXT

Mention aspects of the socio-economic, cultural or political context of your concern that can or has impacted - either positively or negatively- the project's Environmental and Social Standards' performance (detected for the present reporting period)

SECTION IV – CHALLENGES AND LESSONS LEARNED

Mention any challenges faced during Project implementation in the reporting period, measures taken to overcome those challenges and lessons learned.

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SECTION V: OTHER RELEVANT INFORMATION

Any additional relevant information to mention in this report, including compliance with agreed actions in the latest Aide Memoir.

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ANNEX 5. CODE OF CONDUCT TEMPLATE

I, _____, staff at the PIU in [name of Ministry/Agency where the PIU sits) for the Project [name of Project], acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing Gender Based Violence (GBV), including sexual exploitation and abuse (SEA), and sexual harassment (SH) at the workplace, is important in and outside the context of this project, as further set out in this Code of Conduct. As such, we acknowledge this Code of Conduct identifies the behaviour that is expected of all PIU staff for the Project [name of the Project].

Our workplace is an environment where unsafe, offensive, abusive or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

For the purpose of this Code of Conduct, it is important to note that GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (that is, gender) differences between male and female individuals. GBV includes acts that inflict physical, mental, or sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV includes the following concepts:

- **Sexual Exploitation and Abuse (SEA):** Sexual exploitation is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual harassment (SH):** occurs between personnel and staff on the project and means any unwelcome sexual advance, request for sexual favors, and other verbal or physical conduct of a sexual nature.

A violation to this Code of Conduct, including failure to follow ESHS and OHS standards, or engaging in activities constituting GBV including SEA/SH—be it on the workplace, work sites, work site surroundings, at workers' camps, or the surrounding communities—, constitute acts of serious misconduct, which contravenes the terms of employment, and are therefore grounds for disciplinary action up to and including termination of employment for PIU staff. Acts that may violate the laws of [country] will be additionally referred to the corresponding legal authorities, including for potential prosecution under the Criminal Code.

Commitments under this Code of Conduct

I agree that while working on the project I shall:

General:

1. carry out my duties competently and diligently.
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Project staff, workers, and any other person.

Regarding ESHS and OHS

3. Attend and actively partake in training courses related to ESHS and OHS as requested by my employer.
4. Always wear my personal protective equipment (PPE) when at the work site or engaged in project related activities.
5. Implement the OHS Management Plan.
6. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties.
7. Report work situations that are not safe or healthy and remove myself from a work situation which I reasonably believe presents an imminent and serious danger to my life or health.

Regarding equality of opportunity and treatment

8. Treat women, children (persons under the age of 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

Regarding discrimination and violence based on gender

9. Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
10. Not engage in SEA with project beneficiaries and members of the surrounding communities.
11. Not engage in sexual harassment with other project personnel and staff —for instance, comments on the appearance of another worker (either positive or negative) and sexual desirability. making unwelcome sexual advances, looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; and offering or giving personal gifts.
12. Not engage in sexual favours —for instance, making promises of favourable treatment (e.g. promotion), threats of unfavourable treatment (e.g. loss of job) or payments in kind or in cash, dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviour.
13. Unless there is the full consent[18] by all parties involved, not have sexual interactions with members of the surrounding communities or work colleagues. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex (including prostitution). Such sexual activity is considered “non-consensual” within the scope of this Code.

Regarding children under the age of 18

[18] Consent is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance or agreement to do something. Consent must be informed, based on a clear appreciation and understanding of the facts, implications and future consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force or threats). No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. For the purpose of this Code of Conduct, consent cannot be given by children under the age of 18, even if national legislation introduces a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

14. Not engage in any form of sexual contact or activity with children under the age of 18—including grooming or contact through digital media. Mistaken belief regarding the age of a child or his/her consent is not a defense or excuse.
15. Bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.
16. Wherever possible, ensure that another adult is present when working in the proximity of children.
17. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
18. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.
19. Refrain from hiring children below the minimum age of 18.
20. Comply with all relevant local legislation, including labour laws in relation to child labour.
21. When photographing or filming a child for work related purposes, I must:
    a) Before photographing or filming a child, assess and endeavour to comply with local traditions or restrictions for reproducing personal images.
    b) Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
    c) Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive way. Children should be adequately clothed and not in poses that could be sexually suggestive.
    d) Ensure images are honest representations of the context and the facts.
    e) Ensure file labels do not reveal identifying information about a child when sending images electronically.

Disciplinary measures

The Ministry of [specify ministry where the PIU sits] shall be responsible for making decisions on the specific sanctions to be imposed on workers for violations to this Code of Conduct. I understand that if I breach this Code of Conduct, the Ministry of [specify ministry where the PIU sits] will take disciplinary action according to the seriousness of the offense which could include:

- verbal notification (For Public Officers)/ warning for PIU staff employed by the Ministry of [specify ministry where the PIU sits]
- written notification (For Public Officers)/ warning for PIU staff employed by the Ministry of [specify ministry where the PIU sits]
- termination of employment

Infringements sanctioned with verbal notification

Those behaviours that do not cause relevant risks to the Ministry of [specify ministry where the PIU sits], other workers and/or its relationship with the communities. Verbal warnings may involve a reminder of the Code of Conduct and its applicability.

Infringements sanctioned with written notification

Those behaviours that cause minor risk to the Ministry of [specify ministry where the PIU sits], other workers and/or its relationship with the communities and/or the environment.

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Infringements sanctioned with termination of employment

Those behaviours that cause substantive risks to the Ministry of [specify ministry where the PIU sits], other workers and/or its relationship with the communities and/or the environment, or behaviours that constitute serious misconduct in accordance with this Code of Conduct. In such cases, the termination of employment may be accompanied by a referral to the corresponding legal authorities. Cases of SEA or SH will always be considered serious misconduct. Recurrent offences to the Code of Conduct will also be considered serious misconduct.

Termination of employment shall be carried out in accordance with the Labour Code of [country].

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met; that I will adhere to the occupational health and safety management plan; and, that I will avoid actions or behaviors that could be construed as GBV, including SEA and SH. Any such actions will be a breach of this Code of Conduct. I do hereby acknowledge that I have read the foregoing Code of Conduct, agree to comply with the standards contained herein, and understand my roles and responsibilities to prevent and respond to ESHS, OHS, and GBV issues. I understand that any action inconsistent with this Code of Conduct or failure to act, may result in disciplinary action.

Staff Signature: _____

Printed Name: _____

Title: _____

Date: _____

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ANNEX 6. NATIONAL REGULATORY FRAMEWORK

The annex identifies a number of international treaties and conventions that the participating countries are parties to. The annex includes a summary of key relevant legislations related to the Project. This annex must read together with Section 2.2 National Policy and Legal Frameworks.

International and Regional Marine Agreements Relevant to the Wider Caribbean Region

	UNCLOS	UNFSA	UNFCCC	CBD	SOLAS	MARPOL 73/78	Cartagena	CRFM	ICCAT	WECAFC
GND	B 1991	B 1995	B 1994	B 1994	B 2004	B 2018	B 1987	B		C
SLA	B 1985	B 1996	B 1994	B 1993	B 2004	B 2000	B 1984	B		C
SVG	B 1993	B 2010	B 1996	B 1996	B 1984	B 1984	B 1990	B	B 2006	C

B = a binding commitment to the agreement by ratification, accession, acceptance, or adoption; C = agreement to cooperate by signing

UNCLOS 1982 United Nations Convention on the Law of the Sea

UNFSA 1995 United Nations Fish Stocks Agreement

UNFCCC 1992 United Nations Framework Convention on Climate Change

CBD 1993 Convention on Biological Diversity

SOLAS International Convention for the Safety of Life at Sea, 1974

MARPOL 1973/1978 International Convention for the Prevention of pollution from ships

Cartagena Convention for the Protection and Development of the Marine Environment in the Wider Caribbean Region

CRFM Caribbean Regional Fisheries Mechanism

ICCAT International Convention for the Conservation of Atlantic Tunas

WECAFC Western Central Atlantic Fisheries Commission

Regional:

- St. George's Declaration (SGD) at the OECS level
- Caribbean Challenge Initiative
- Eastern Caribbean Regional Ocean Policy (ECROP)
- Revised Treaty of Basseterre
- The Treaty of Chaguaramas
- Regional Security System (RSS)

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Grenada

Grenada Environmental Impact Assessment (EIA) Requirements
The national government has the ability to require the preparation of environmental studies and assessments with regard to development in coastal environments.

The *Physical Planning and Development Control Act, 2016* allows the Planning and Development Authority to require that an EIA be prepared as part of the approvals process for the development of land if the proposed development could significantly alter the environment or in instances where development would occur within an identified Environmental Protection Area. The act specifically identifies development within the coastal zone as that which would normally require preparation of an EIA as part of the development approvals process.

Previously-drafted legislation which was not enacted would have granted similarly-broad powers to require EIA studies regarding development in the coastal environment. The draft *Environmental Management Act, 2005* would have enabled the creation of an Environmental Management Agency, with responsibility for assessing "developmental activities which may have an adverse effect on the environment… before such activity is commenced". That agency would have the power to require that an EIA be prepared prior to the granting of any development approvals for "any project which may have a significant effect on the environment", where "environment" was defined as "the land, water and atmosphere of the earth". Accordingly, while not specific to the coastal space, this requirement for an EIA could have applied to projects within the coastal space.

Several policy frameworks offer direction on the preparation of environmental studies in the context of coastal development. These include:

- *Grenada National Ocean Policy*, which directs decision makers to use environmental impact assessments as part of a risk-based approach to ensuring that activities and developments in the coastal zone are climate resilient and sustainable; and
- *Sauteurs Local Area Plan*, which recommends that EIA studies be undertaken as part of any project to develop port infrastructure in the Sauteurs area.

Solid Waste Management Authority Act (1995)
An act to establish a Solid Waste Management Authority charged with the duty of developing the solid waste management facilities and improving the coverage and effectiveness of solid waste storage, collection and disposal facilities.

Saint Lucia

Saint Lucia Environmental Impact Assessment (EIA) requirements
The national government has the ability to require the preparation of environmental studies and assessments with regard to development in coastal environments. The Planning Act makes the provision of undertaking EIA for specific projects, which may likely affect the environment. Depending on the nature of the proposed development work and likely negative impact on the

environment, an EIA report has to be submitted in order to evaluate the application and make decisions. The EIA has to be undertaken on agreed terms of reference and by a qualified professional.

Physical Planning and Development Act (2005)
The Physical Planning and Development Act is to make provision for the development of land, the assessment of the environmental impacts of development, the grant of permission to develop land and for other powers to regulate the use of land, and for related matters. A person shall not commence or carry out the development of any land in Saint Lucia without the prior written permission of the head of the Physical Planning and Development Division. An application to the Head of the Physical Planning and Development Division for permission to develop land shall be made on the prescribed form and shall be accompanied by:
a) a map sufficient to identify the land to which it relates and such plans, drawings and other materials as are necessary to describe the development which is the subject of the application;
b) notice in writing signed by the owner or agent of the owner of the land to which the application relates acknowledging that the owner has knowledge of and does not object to the making of the application;
c) any statutory consent which the applicant is required to obtain for or in connection with the development prior to applying for the permission of the Head of the Physical Planning and Development Division;
d) in cases where this is required by regulations made under this Act, the certificate of an engineer registered under the Engineers (Registration) Act; and
e) proof of payment of such fees as may be prescribed by regulations made under this Act.
This act may be relevant to the rehabilitation and retrofitting of existing training centres.

Saint Lucia Solid Waste Management Authority (1996)
The Authority was given the following mandate:
Manage, regulate, control and treat waste in Saint Lucia
• Establish, maintain, improve and regulate the use sanitary landfills and facilities, in accordance with established scientific principles and practices
• Establish and manage facilities for the collection and treatment of all including hazardous waste
• Establish and maintain transfer stations
• Establish and promote a resource recovery system
• Oversee scheduling, safety and maintenance issues associated with solid waste management
• Promote and oversee public education related to solid waste management in collaboration with the relevant ministries
• Develop a network to receive, monitor and respond to public complaints.

<u>Saint Vincent and the Grenadines</u>

Saint Vincent and the Grenadines Environmental Impact Assessment (EIA) requirements

The Physical Planning and Development Board can require the submission of an environmental impact assessment (EIA), as per the Town and Country Planning Act[19]:

- *where it is aware that any person proposes to undertake in a prescribed area any enterprise, construction or development of a prescribed description or category; or*
- *where it is of the opinion that the activities of any enterprise, construction or development which has already been established or operational within such prescribed area is causing or is likely to cause pollution or is otherwise having or is likely to have an adverse effect on the environment.*

[19] Amendments to the TCPA, including EIA regulations, were submitted to the Attorney General in 2019.

Failure to submit an EIA to the Board can result in an offence and a potential fine. Project monitoring falls under the mandate of Environmental Health. Cooperation and coordination between the Physical Planning and Development Board and the Environmental Health agency is lacking which hinders the EIA process.

The Town and Country Planning Act (TCPA), 1992, allows the Physical Planning and Development Board to require that an EIA be prepared as part of the approvals process for the development of land if the proposed development where it is of the opinion that the activities of any enterprise, construction or development which has already been established or operational within such prescribed area is causing or is likely to cause pollution or is otherwise having or is likely to have an adverse effect on the environment. As "land" is defined in that act to include "including land covered by water" this requirement could be applied to instances of development involving works taking place on the seabed.

Article 29 of the Town and Country Planning Act requires an EIA for environmentally sensitive projects or activities. The Physical Planning Unit has the legal authority for environmental management in general under this Act, including the evaluation of the need for and level of EIA required. The scope of the EIA is determined through discussion with the PPU.

The draft Environmental Management Bill, 2009 requires that special conditions be placed on coastal, industrial and hillside developments. The draft regulations associated with the draft legislation calls for Environmental Impact Assessments to be used to gauge the degree of risk associated with development in certain geographic areas.

The National Ocean Policy allows the government to require an EIA for developments/projects in coastal and marine spaces:

- Policy 4, Goal 4.2 of the NOP
  "To ensure the environmental impacts of all marine and land-based developments and activities are rigorously assessed in a transparent manner"
- Action 7.1 of the NOP SAP
  "Adopt measures to protect vulnerable coastal and marine ecosystems from adverse impacts of development activities, including the use of environmental impact assessments"
- Action 10.2 of the NOP SAP

"Strengthen research facilities for systematic observation of marine pollution, environmental impact assessment and development of control mechanisms."

Waste Management Act (2000)
This Act contains rules for the public management and disposal of solid waste as defined in section 2 and including hazardous waste as defined in Schedule 1 to this Act, and provides for appointment, functions, etc. of the National Solid Waste Management Authority.

Environmental Health Services Act (1991)
This act makes provision for the conservation and maintenance of the environment in the interest of health generally and in particular in relation to places frequented by the public. It contains, *inter alia*:
• Prohibitions and obligations in the interest of the environment
• Certificate of approval for certain matters
• Notification of emission or discharge etc. of contaminant or pollutant

This Act requires a certificate of approval to be obtained from the Environmental Health Division for the construction, alteration, restoration or replacement of any equipment, apparatus or mechanism which may emit or discharge a pollutant into any part of the environment; or to carryon

or alter a process or rate of production with the result that a contaminant or pollutant may be emitted.

ANNEX 7. ENVIRONMENTAL AND SOCIAL SETTING

Physical Environment

Grenada

The capital, St. George's, on the southwest coast, is also the main port, having a fine natural harbour, and its picturesque pastel-coloured houses rise up the hillsides from the waterfront. The waterfront itself is known as the Carenage because island schooners were once careened (beached for cleaning or repair) there. St. George's is the yachting and charter-boat centre of the eastern Caribbean.

Grenada is volcanic in origin, with a ridge of mountains running north and south—the steeper slopes to the west and a more gradual incline to the east and southeast. The highest point is Mount St. Catherine (2,757 feet [840 metres]) in the northern part of the interior. The landscape is scenic, with fairly deep steep-sided valleys and about 10,000 acres (4,000 hectares) of forest.

Saint Lucia

The island is of volcanic origin and is bisected from north to south by a central ridge of wooded mountains, the highest point being Mount Gimie (3,145 feet [959 metres]). Many streams flow from the mountains through fertile valleys. In the southwest are the Gros and Petit Pitons (2,619 feet [798 metres] and 2,460 feet [750 metres], respectively), two immense pyramids of rock rising sharply from the sea and enclosing a small bay. Near Petit Piton, in the crater of an ancient volcano, are the boiling sulphur springs from which the nearby town of Soufrière takes its name. A choice tourist site, the springs also contain substantial energy potential.

Saint Vincent and the Grenadines

The island of Saint Vincent has thickly wooded volcanic mountains running north-south and many short swift streams. Though numerous, the streams are small except after heavy rains. There are no navigable rivers. The island's two highest peaks are both on the volcano Soufrière (4,048 feet [1,234 metres] and 3,864 feet [1,178 metres]), in the north, which erupted disastrously in 1812 and 1902, seriously affecting the country's agriculture and temporarily displacing residents of communities around the foothills of the volcano. The 1902 eruption coincided with that of Mount Pelée on Martinique. Soufrière became active again in 1979, repeating the cycle of agricultural damage and massive evacuation. The volcanic ash, which spread as far as Barbados, is said to have enhanced the fertility of the soil. Other noteworthy peaks on the island include Grand Bonhomme and Mount St. Andrew.

Biological Resources

Grenada

Data indicated that in 2015, nearly 50% of Grenada's total area was covered in forests. Grenada's forest cover has remained relatively stable from 2004 to 2015 mainly due to the policies put in place by the Grenadian government. The Grenadian forests are used for a variety of purposes such as the production of timber and providing habitat for the country's wildlife. The Grenadian forests are also crucial to the country's economy because they attract significant numbers of tourists each year.

Saint Lucia

Saint Lucia is part of the Lesser Antilles, an arc of volcanic peaks located in the Eastern Caribbean. Though the island has a relatively small landmass, it possesses a high degree of biodiversity and

species endemism and productive coastal and nearshore habitats, earning it international recognition as a biodiversity hotspot. The island and its waters support a number of globally and regionally important habitats and species, including 17 major vegetation types (e.g., dry forest, mangroves, rainforest), the Pitons Management Area United Nations Educational, Scientific, and Cultural Organization World Heritage site, the Ma Koté Mangrove and Savannes Bay Ramsar sites, and over 200 endemic species (e.g., the pygmy gecko, the Saint Lucia racer snake, and the Saint Lucia parrot). Saint Lucia's marine habitats and biodiversity provide ecosystem services that buffer the impacts of storms and climate change, provide residents with valuable natural resources and opportunities for sustainable livelihoods, and support economically important agriculture and tourism industries.

Saint Vincent and the Grenadines

Saint Vincent and the Grenadines boasts a diverse collection of biological resources. St. Vincent is rugged and mountainous with steep slopes and fertile yellow earth, volcanic ash and alluvial soils. The country has about 12,700 ha of tropical forests, including primary and secondary rainforest, palm brakes, elfin woodland, littoral woodland, dry scrub woodlands and mangrove forest. The significant tropical forests provide natural habitat for wildlife including the St. Vincent Parrot and other endemic species. The Grenadines, in contrast, consists of low dry islands surrounded by extensive coral reefs and sea grass beds.

Physical Cultural Resources, Human Settlement and Land Use

Grenada

The last population census conducted in Grenada in 2011 revealed that the island has 106, 667 people. The Census also showed that there are more males than females indicating numbers of 53, 898 and 52, 769 respectively. The age group with the largest number of people is the 20-24 grouping with a percentage of 9.29 of the entire population and is closely followed by the 15-19 age range with 9.27 %. Sixty three percent (63 %) of the population are below 40 years old. The Census also showed that the highest concentration of the population is concentrated in the St. George's area (35.9 %). That is not at all surprising given the fact that it is the parish where the capital is located and quite understandably, is the main commercial and industrial centre. The parish with the second highest concentration of the population is that of St. Andrews with 24.8 %. So essentially, over 60 % of the entire population reside in St. Georges and St. Andrews. The St. Andrews parish is considered as the main breadbasket of the island, having the highest agricultural production output.

Saint Lucia

As of 2002 St Lucia's population was about 183,600. Despite being one of the smallest countries in the world (617 square kilometers or 238 square miles) and ranking 191st in size, St Lucia has a fairly high population density of 298 people per square kilometer, which ranks 41st. The capital and largest city is Castries, with a 2014 population of 70,000, or more than one-third of the total population. Castries is a major tourist destination and a cruise ship port. St Lucia's population is evenly split between rural and urban areas, despite the high population in Castries.

The population is mostly African or of mixed African-European descent, with a small population of Indo-Caribbeans (3%). Afro-Caribbeans account for 68% of the population, followed by mixed (17%) and European (5%).

Saint Vincent and the Grenadines

The last population census undertaken in 2012 indicated that St Vincent and the Grenadines has

a population of 109,991, with a ratio of 1.05 males for every female. The country is densely populated with 307 people per square kilometre (792/sq mi), which ranks 39th in the world. The capital and largest city is Kingstown, with a population estimated at 35,000.

Socio-Economic

Grenada

Grenada's economy over the years has been transformed into a predominantly service sector economy with the Tourism sector being the main contributor to Gross Domestic product (GDP). In recent times the Government has been placing enormous emphasis on the development of that sector by promoting the development of high-end quality resorts, investing more in promotional activities and seeking to enhance the country as pure and pristine. Grenada has a lot of attractions to offer, very favourable weather conditions, excellent beaches, lakes, waterfalls, very friendly and hospitable people, low crime rate, good infrastructure, exceedingly clean and pristine environment, fairly close proximity to the USA market etc. have placed Grenada in a very advantageous position to capitalize on the tourism market.

Saint Lucia

The country's economy depends primarily on tourism (65% of GDP), banana production, and light manufacturing. The per capita GDP increased slightly, from US$ 6,626 in 2010 to US$ 6,848 in 2014. According to an International Monetary Fund report, Saint Lucia's economic activity has recovered, and the country's fiscal situation became stronger in 2014, mainly due to strong tourism inflows and lower oil prices. After the 2012 recession and close-to-zero growth in 2013, in 2014 the economy has again showing signs of recovery, with GDP growth reaching 0.5%, mainly driven by the transportation and hotel industries, although the construction, communication, and agriculture sectors remained in decline.

Saint Vincent and the Grenadines

Saint Vincent and the Grenadines is considered a lower-middle income country with a Gross Domestic Product per capita of US$6,443.00. The economy depends on agriculture, tourism, construction, remittances, and a small offshore banking sector. Many fundamentals for greater economic freedom, such as flexible regulations, an efficient legal system that secures private property, and macroeconomic stability, are in place. Greater access to private financing and more openness to trade and international investment would improve the business climate. The economy was negatively affected by U.S. economic sanctions imposed on Venezuela in 2018.

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ANNEX 8. NEGATIVE LIST OF ACTIVITIES

Access to project and sub-project financing in support of any of the following activities listed in this annex are prohibited:

1. Uses of goods and equipment involving forced labour, child labour, or other harmful or exploitative forms of labour.
2. Purchase and use of formulated projects that fall in the World Health Organization classes IA and IB or formulations of products in class II if they are likely to be used by, or be accessible to, lay personnel, farmers or others without training, equipment and facilities to handle, store and apply these products properly.
3. Financing of elections or election campaigning.
4. Funding salaries or salary supplements of government security personnel.
5. Purchase of firearms or other weapons.
6. Activities that contravene local laws related to purchase and consumption of tobacco, alcoholic beverages and other drugs.
7. Manufacture of alcohol for local consumption and/or cultivation of crops for this purpose.
8. Activities carried out in relation to the adjudication of lands under dispute.
9. Purchase of land.
10. Activities that have potential to causes adverse impacts to critical habitat.
11. Activities that lead to conversion, deforestation or degradation of natural forests or other natural habitats, including, among others, conversion to agriculture or tree plantations.
12. Activities affecting protected areas (or buffer zones thereof).
13. Activities related to commercialization of illegal timber and non-timber forest products.
14. Construction and/or restoration of religious buildings.
15. Removal or alteration of any physical cultural heritage property (includes sites having archaeological, paleontological, historical, religious or unique natural values).
16. Uses of goods and equipment for military or paramilitary purposes.
17. Uses of goods and equipment in response to conflict, in any area with active military or armed group operations.

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ANNEX 9. ENVIRONMENTAL & SOCIAL SCREENING FORM

Sub-project Name:

Location:

Date:

Screening carried out by:

SNo	Question	Response Y/N	Remarks (briefly explain the response)
1.	Will the subproject have the potential to cause adverse impacts to natural habitats?		
2.	Will the sub-project negatively impact protected areas or defined buffer zones?		
3.	Will the sub-project have potential impacts on threatened and/or endangered species and their habitats?		
4.	Will the sub-project have direct impacts on ecosystem services that may result in adverse health and safety risks to affected communities?		
5.	Will the sub-project generate hazardous waste?		
6.	Will the sub-project affect groundwater quality or the quality of water bodies?		
7.	Will the sub-project lead to sedimentation?		
8.	Will the sub-project involve activities that are likely to have adverse impacts on the local community?		
9.	Will the sub-project result in potential traffic and road safety risks to workers, communities and road users throughout the sub-project life cycle?		
10.	Will the sub-project induce encroachment of nearby areas?		
11.	Will the sub-project lead to negative impacts on the health of the local population?		
12.	Will the sub-project negatively affect surrounding properties?		
13.	Will the sub-project lead to diverse and multiple E&S impacts extended over a large area?		
14.	Will the sub-project potentially cause irreversible impacts or impacts not easily mitigated?		
15.	Will the sub-project result in reduced or restricted access to the resources in a protected area?		

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16.	Will the sub-project result in removal or eviction of anyone from a protected area?		
17.	Will the subproject require the acquisition of land?		
18.	Will the subproject activities lead to physical or economic displacement?		
19.	Will the sub-project include any activities that might impact the health or safety of project staff or other people associated with the project?		
20.	Will the sub-project involve the removal or alteration of any physical cultural resources?		
21.	Will the proposed project take place in difficult to access areas?		

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ANNEX 10. ENVIRONMENTAL & SOCIAL IMPACT ASSESSMENT & ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN TEMPLATES[20]

The objectives the Environmental and Social Impact Assessment are to:

- Establish the baseline conditions of the study area through a combination of desk review, consultations and site visits taking account of any committed development projects which could change the baseline in the future;
- Identify environmental and social constraints and opportunities associated with the study area;
- Identify and assess any environmental and social impacts (both positive and negative) which could result from the proposed sub-project;
- Identify and incorporate into project design and operation, features and measures to avoid or mitigate adverse impacts and enhance beneficial impacts; and
- Assess the level of significance of all residual effects (direct and indirect, adverse and beneficial, short-term and long-term, permanent and temporary) taking into account of the proposed mitigation measures

The **ESIA** should encompass the following:

1. Executive summary

2. Legal and Regulation Framework
   - Analyzes the legal and institutional framework for the sub-project, within which the environmental and social assessment is carried out, including the issues set out in ESS1, paragraph 26 of the World Bank ESF.
   - Compliance with World Bank Group Environmental, Health and Safety Guidelines

3. Project Description

Concisely describes the proposed subproject and its geographic, environmental, social, and temporal context. Through consideration of the details of the project, indicates the need for any plan to meet the requirements of ESS1 through 10, includes a map of sufficient detail, showing the subproject site and the area that may be affected by the project's direct, indirect, and cumulative impacts.

4. Baseline Data
   - Identify the baseline data that is relevant to decisions about project location, design, operation, or mitigation measures. This should include estimation of the extent and quality of available data, key data gaps, and uncertainties associated with predictions.
   - Based on current information, assesses the scope of the area to be studied and describe relevant physical, biological, socioeconomic and cultural heritage conditions, including any changes anticipated before the project commences.
   - Site investigation results.

5. Alternatives analysis
   - Site selection criteria
   - For each of the alternatives, quantify the environmental and social impacts to the extent possible, and attaches economic values where feasible.

[20] From World Bank. 2018. ESF Guidance note for ESS1. Annex 1 Section D. Indicative Outline of ESIA and Section E. Indicative Outline of ESMP

- With and without subproject scenario
- Description of selected site
- Feasibility of subproject in selected site i.e environmental, social and economic

6. E&S Risks and Impacts

This should take into account all relevant environmental and social risks and impacts of the subproject. This will include the environmental and social risks and impacts specifically identified in the relevant ESS's and any other environmental and social risks and impacts arising as a consequence of the specific nature and context of the project, including the risks and impacts identified in ESS1, paragraph 28. It should include the positive environmental and social outcomes as well.

7. Mitigation Measures

Identifies mitigation measures to manage the environmental and social impacts and significant residual negative impacts that cannot be mitigated and, to the extent possible, assesses the acceptability of those residual negative impacts. Identifies differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable. Assesses the feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of proposed mitigation measures, and their suitability under local conditions; and the institutional, training, and monitoring requirements for the proposed mitigation measures. Covers Environmental and workers health and safety measures and any measures to protect cultural heritage. Includes a monitoring plan identifying parameters to be monitored, frequency and responsible authority.

8. Public consultation and information disclosure

Stakeholder engagement carried out

Grievance Redress System (the same as in the SEP)

9. Institutional Arrangements and Reporting

Annexes

- List of the individuals or organizations that prepared or contributed to the environmental
- and social assessment.
- References—setting out the written materials both published and unpublished, that have been used.
- Record of meetings, consultations and surveys with stakeholders, including those with affected people and other interested parties.

Outline of Environmental and Social Management Plan

Based on the requirements laid out in the ESMF, the ESMP should describe the mitigation, monitoring, and institutional measures to be taken during implementation and operation to eliminate adverse environmental and social risks and impacts. The ESMP should also include the measures and actions needed to implement these measures.

The ESMP should encompass the following:

1. Objectives of the ESMP
2. Project Description

This summarizes the subproject and provides maps map of sufficient detail, showing the project site and the area that may be affected by the project's direct and indirect impacts.

3. Mitigation Measures

This should identify and summarize all anticipated adverse environmental and social impacts and describe with technical details each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate. It should also estimate any potential environmental and social impacts of these measures.

4. Public Consultation and Stakeholder Engagement

This section should provide:

- A summary of consultations undertaken during subproject preparation
- A description of how the stakeholder engagement will take place during subproject implementation
- How the GRM is implemented in the local context i.e. how the Project GRM will be adapted

5. Monitoring Plan

This should identify the monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the ESIA (or IEE) and the mitigation measures described. This is meant to provide (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

6. Capacity Development and Trainings

This should provide a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training).

7. Implementation Schedule and Cost Estimates

For all three aspects (mitigation, monitoring, and capacity development), the ESMP should include (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables.

8. Integration of ESMP with Project

The individual mitigation and monitoring measures and actions and the institutional responsibilities relating to each, and the costs of so should be integrated into the project's overall planning, design, budget, and implementation.

9. Legal requirements and bidding/contract documents

The ESMP should be incorporated in all legal documents to enforce compliance by all contractors participating in the project. The ESMP should be summarized and incorporated in the bidding and contract documents.

Annexes

Any site specific plan required

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ANNEX 11. CHANCE FIND PROCEDURES

Purpose

During sub-project implementation/construction, there is the possibility that previously unknown cultural heritage items may be discovered. This Chance Find Procedure is intended to manage impacts to unknown cultural heritage items. The procedure should be implemented in collaboration with the relevant national authority responsible for cultural heritage. It is important that all sub-project staff and contractors be aware of the potential to discover chance finds and the procedures outlined here. Prior to start of the UBEC project, a relevant contact person at the national authority responsible for cultural heritage will be identified who can be contacted in case of chance finds.

Objectives

- Define the steps that must be followed to manage the discovery of previously unknown cultural heritage, including the preservation and appropriate treatment of these finds, while also minimizing the potential disruption to the sub-project schedule.
- Enable compliance with relevant national laws and regulations along with other requirements that relate to the discovery of heritage items.

Scope

The Chance Find Procedures (CFP) for identification, protection from theft, and treatment of discovered artifacts shall be included in the bidding documents and followed by the contractor, project supervisor, and all responsible local authorities.

Steps

If a chance find is discovered the following steps should be undertaken by the contractor:

1. Issue a STOP WORK order in the vicinity of the find.
2. Inform the supervision engineer.
3. Inform the PIU of the country where the find was encountered.
4. Install temporary site protection measures, such as warning tape of avoidance signs, to establish a restricted area around the Chance Find.
5. The Project Manager will record details (location and description) of the find and inform the identified national authority responsible for cultural heritage
6. Inform sub-project personnel about the Chance Find and restricted area.
7. The PIU will Invite the identified contact person at the national authority responsible for cultural heritage to document the Chance Find, perform a preliminary evaluation to determine whether the Chance Find is cultural heritage and if so, whether it is an isolate or part of a larger site or feature.
8. Determine with the identified personnel when civil works can resume in the vicinity of the find.
9. Artifacts should be left in place if possible; if materials are collected, they will be placed in bags and labelled by an archaeologist and transported to the relevant agency. ***Artifacts are not allowed to be taken by any sub-project personnel as personal possession.***
10. The find should be documented via the use of photography, notes, GPS coordinates and maps, as appropriate.
11. If the Chance Find proves to be an isolated find or not of cultural heritage, the archaeologist appointed by the national authority for cultural heritage will authorize the removal of the site protection measures and the resumption of activity in the area.

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12. If, however, the archaeologist appointed by the national authority for cultural heritage confirms the Chance Find as a cultural heritage of significance, the relevant national authority will be informed within three days of that determination and initiate discussions about treatment.
13. Prepare and retain archaeological monitoring records, including initial reports, whether they are later confirmed or not. The record shall include coordinates of all observations to be retained by the sub-project.
14. Develop and implement treatment plans for confirmed finds using the services of qualified cultural heritage experts.
15. If a Chance Find is a verified cultural heritage site, a final Chance Find report shall be prepared once treatment has been completed.
16. While investigation is on-going, there will be coordination with sub-project personnel aimed at keeping them informed about the status and schedule of the investigations into the chance find. Sub-project personnel will also be informed as timing of the resumption of sub-project activities in the vicinity of the find.

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RESOURCES

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