

# **Saint Lucia**

## **Strengthening Prevention, Preparedness and Response to Emerging Health Threats in The OECS Region Project (P509060)**

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

**Appraisal Version**

**April 11, 2025**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. **Saint Lucia** (hereinafter the Recipient) will implement the proposed “Strengthening Prevention, Preparedness and Response to Emerging Health Threats in The OECS Region” Project (the Project) with the involvement of the “Ministry of Health and Wellness and Elderly Affairs (MOHWEA),” as set out in the Grant Agreement. The International Bank for Reconstruction and Development/International Development Association (hereinafter the “Bank”,) acting as an Implementing Entity of the Pandemic Prevention, Preparedness and Response Trust Fund, has agreed to provide financing for the Project, as set out in the referred Agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient’s Representative specified in the Agreement. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT<sup>1</sup></b>			
A	<b>ORGANIZATIONAL STRUCTURE</b> <p>a. Maintain the existing Project Implementation Unit (PIU) within the Ministry of Health and Wellness and Elderly Affairs (MOHWEA), that is tasked with E&amp;S management, with qualified staff and resources to support management of environmental, social, health and safety (E&amp;S) risks and impacts of the Project.</p> <p>b. Enter into arrangements with other entities or agencies that will co-implement project activities, with which the implementing agency needs to engage to manage the environmental and social (E&amp;S) risks and impacts of the project.</p>	<p>a. Hire or appoint the E&amp;S specialist no later than 30 days after the Effective Date and thereafter maintain the PIU and these positions throughout Project implementation.</p> <p>b. Before entities/ agencies begins co- implementing Project activities</p>	(MOHWEA)
B	<b>CAPACITY BUILDING PLAN/MEASURES</b> <p>Prepare and implement the capacity building plan to enhance the PIU awareness of potential environmental and social issues arising from Project activities and the implementation of Technical Assistance Outputs</p>	Formulate the Plan no later than 30 days after the Effective Date and implement it throughout the duration of the Project.	(MOHWEA)
<b>MONITORING AND REPORTING</b>			
C	<b>REGULAR REPORTING</b> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&amp;S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> <li>• Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.</li> <li>• Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> </ul>	Submit semestral reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 30 days after the end of each reporting period.	(MOHWEA),

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> <li>E&amp;S performance of firms/contractors/subcontractors as reported through monthly firm/s contractors' and supervision firms' reports.</li> <li>Number and status of resolution of incidents and accidents reported under action "D" below.</li> </ul>		
D	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank/Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	(MOHWEA),
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>Update as necessary and implement the Environmental and Social Management Framework (ESMF) prepared under the OECS Regional Health Project (P168539), for the Project, and ensure it is consistent with the relevant Environmental and Social Standards (ESSs)</p>	Update the ESMF to the start of Project activities and thereafter implement the ESMF throughout Project implementation.	(MOHWEA),
1.2	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout Project implementation.	(MOHWEA),

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The Terms of Reference (ToRs) for the development of Technical Assistance (TA) shall require that, where relevant, the implementation of the TA outputs considers measures to ensure infection control, safe management and use of chemicals, appropriate waste management, resilient building construction, inclusive stakeholder engagement, and adoption of protocols and procedures that will implement the TA outputs in line with Good International Industry Practice (GIIP)		
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Ensure that Project workers are engaged in the implementation of the Project consistent with ESS2.</p> <p>To this end, ensure that the following measures are carried out:</p> <ul style="list-style-type: none"> <li>a) Provide workers with information and documentation that is clear and understandable regarding their terms and conditions of employment through written contracts setting out their rights, including, inter alia, rights related to hours of work, wages, overtime, compensation and benefits, as well as written notice of termination of employment, and details of severance payments, as applicable.</li> <li>b) Implement occupational health and safety (including personal protective equipment, and emergency preparedness and response) measures, taking into account the General Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP) and, as appropriate, the industry-specific EHSGs and other Good International Industry Practice (GIIP);</li> <li>c) Implement measures, as applicable, to, inter alia: (i) prevent the use of all forms of forced labor and child labor; (ii) enable workers to benefit from, inter alia, access to grievance and redress mechanisms without fear of retaliation; and effective freedom to form and join workers organizations or alternative mechanisms for expressing their concerns and protect their rights related to labor and working conditions.</li> <li>d) Develop a code of conduct for workers, which shall include measures to prevent and respond to SEA and SH cases.</li> </ul>	Carry out the measures throughout the implementation of the Project.	(MOHWEA),

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>e) Incorporate the relevant requirements above in the ESHS specifications of the procurement documents and contracts with third parties that engage workers in the implementation of the Project.</p> <p>f) Ensure that the grievance mechanism (GM) has dedicated channels to address worker complaints, as well as specific channels for addressing Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) complaints.</p>		
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Update and implement the grievance mechanism developed under the OECS Regional Health Project (P168539), incorporating channels to address Project workers' grievances, and ensuring consistency with ESS2.</p>	Update the grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	(MOHWEA),
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p>Relevant aspects of this standard shall be considered in the technical assistance activities under action 1.2. above, as relevant. Relevant measures to be considered during the implementation of the TA outputs among others, are:</p> <p>a) Measures to prevent pollution of the environment and harm to workers and the public as a result of waste management, and the handling of chemicals or hazardous materials (ESS3)</p> <p>b) Constructions to comply with appropriate standards/building codes to protect workers and the public; Incident preparedness and response protocols will consider infection control measures to avoid exposure of the public to potential sources of harm; Where technically and financially feasible, apply the concept of universal access<sup>2</sup> to the design and construction of new buildings and structures; Etc. (ESS4)</p>	Same timeframe as for action 1.2 above.	(MOHWEA),
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Relevant aspects of this standard shall be considered in the technical assistance activities under action 1.2, including:</p>	Same timeframe as for action 1.2 above.	(MOHWEA),

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> <li>- Ensuring TA outputs comply with appropriate standards and building codes to protect workers and the public.</li> <li>- Incorporating incident preparedness and response protocols, as well as infection control measures, to prevent exposure of the public to potential sources of harm.</li> <li>- Conducting third-party life and fire safety audits for existing buildings prior to their use</li> </ul>		
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b> Not Currently Relevant			
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b> Not Currently Relevant			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b> Not Currently Relevant			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b>  The implementation of Technical Assistance (TA) outputs shall consider and address potential impacts on both tangible and intangible cultural heritage. The TA outputs will incorporate appropriate environmental and social mitigation measures as needed, in accordance with Environmental and Social Standard 8 (ESS 8)	Throughout Project implementation.	(MOHWEA),
<b>ESS 9: FINANCIAL INTERMEDIARIES</b> Not Currently Relevant			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b>  Incorporate stakeholder engagement and information disclosure measures in the implementation of the Project, in a manner consistent with ESS10.  To this end, ensure that the following measures are implemented: <ul style="list-style-type: none"> <li>a) Provide stakeholders with information about the environmental and social risks and impacts of the Project, in a timely, understandable, accessible and appropriate manner and format, including but not limited to any environmental and social instruments prepared as part of the Project. Related information shall be available in government offices involved in the implementation of the Project, and websites.</li> </ul>	Implement the stakeholder engagement activities throughout the implementation of the Project.	(MOHWEA),

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> <li>b) Consult stakeholders in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation, including with regards to any environmental and social instruments prepared as part of the Project.</li> <li>c) Document the stakeholder engagement activities, including: (i) stakeholder mapping; (ii) description of consultations and participation mechanisms utilized, and records of meetings held; (iii) feedback received and responses to said feedback; and (iv) measures to engage stakeholders who, because of their circumstances, may be disadvantaged or vulnerable.</li> </ul>		
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <ul style="list-style-type: none"> <li>a) Enhance the current grievance mechanisms, under the OECS Regional Health Project (P168539) to meet the needs of the project, including channels to address complaints related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH).</li> <li>b) Receive and facilitate resolution of concerns and grievances, including anonymous complaints, in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all parties affected by the Project at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</li> </ul>	<ul style="list-style-type: none"> <li>a) within 60 days of project effectiveness and implement it throughout the duration of the Project.</li> <li>b) Throughout implementation of the Project.</li> </ul>	(MOHWEA),
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>			
<p>The following actions are indicators for implementation readiness:</p> <p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> <li>A- Hire or appoint an environmental and social specialist to support management of ESHS risks and impacts of the Project.</li> <li>B- Prepare and implement the capacity building</li> </ul>			



MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>2.1 - Ensure that workers are engaged in the implementation of the Project consistent with ESS2.</p> <p>10.1 - Incorporate stakeholder engagement and information disclosure measures in the implementation of the Project, in a manner consistent with ESS10.</p> <p>10.2 - Enhance the current grievance mechanisms, under the OECS Regional Health Project (P168539) to meet the needs of the project, including channels to address complaints related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)</p>		