

Saint Lucia
Ministry of Finance, Economic Development and Youth Economy

**Saint Lucia Urban Resilient Flood Investment
Project (P504998)**

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

Negotiated

Date	Version
July 17, 2025	Appraisal Draft
August 16, 2025	Negotiation Draft (incorporating Client & Legal review comments)
August 19, 2025	Negotiated (as agreed during negotiations)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Saint Lucia (the Recipient) will implement the Saint Lucia Urban Resilient Flood Investment Project (the Project) with the involvement of the Ministry of Finance, Economic Development and Youth Economy (MoFEDYE). The International Development Association (hereinafter the Association) has agreed to provide financing for the Project, as set out in the Financing Agreement (the 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 Association. The ESCP is a part of the 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 Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association 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 Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association 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 of the Project 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
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	ORGANIZATIONAL STRUCTURE a. Hire and maintain an environmental and social specialist to proactively manage the E&S aspects throughout the implementation of the Project to the satisfaction of the Association. b. Prepare to the satisfaction of the Association terms-of-reference for the environmental and social specialist describing their duties, responsibilities, and reporting arrangements, that will include but not be limited to: i. develop and implement E&S criteria for informing the selection of options to progress under the Project; ii. review and update TOR for the detailed design development of the options to be progressed under the Project to ensure the selected options are developed on sustainable principles, including by reference to appropriate design standards, nature-based solutions, construction, and maintenance/management requirements in line with good international industry practice; iii. proactively discuss and review the developing designs, and constructively challenge to reduce environmental, health and safety and social impacts, and improve sustainability; iv. screen to the satisfaction of the Association each option to be progressed to determine the appropriate level of E&S Assessment required to meet the requirements of the ESCP, and to achieve any consents and permits that may be needed for national requirements; v. ensure appropriate E&S requirements are integrated into the procurement documents for construction works, support early market engagement and other procurement initiatives as needed to ensure bidders understand the contractors E&S obligations; vi. monitor regularly construction activities and supervise consulting engineers to ensure the works are carried out per the contract requirements; vii. assist and promote stakeholder engagement at appropriate stages of the Project; viii. to report to the Association as required by this ESCP.	a. The environmental and social specialist to be hired within 30 days of the Effective Date and maintained throughout the implementation of the Project. b. Within 30 days of the Effective Date.	Ministry of Finance, Economic Development and Youth Economy (MoFEDYE)
B	CAPACITY BUILDING PLAN/MEASURES Provide training to PCU staff, relevant government agencies, stakeholders, communities, contractors, and other relevant Project workers on the environmental and social project requirements in line with the following capacity building plan: a. Prepare to the satisfaction of the Association a capacity building plan that describes the activities, training and other measures that will be taken to develop knowledge and skills in environmental, social and health and safety matters. The plan shall indicate what measures (with brief description of the outline/content/intended learning outcomes) that will be provided, to whom,	a. No later than 60 days after the Effective Date. The plan to be reviewed and updated from time to time during the Project to ensure that it remains pertinent to the Project activities being undertaken.	MoFEDYE

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
and when. The plan shall recognize that in addition to general training requirements, different stages of the Project will have specific training needs, for example: i. General training in Project requirements should cover the following topics: ESF requirements; stakeholder engagement and grievance redress mechanism; and sexual exploitation or abuse (SEA)/sexual harassment (SH) risk management. ii. Capacity building measures to be provided during design should include training in the following topics: designing sustainable infrastructure projects; safety through design; design for disease prevention and healthy communities; and, procuring construction works for ESHS performance. iii. Capacity building measures to be provided during construction works should include training in the following topics: ESHS requirements of the contract; general induction for construction workers; code of conduct; and grievance redress. b. Deliver or cause to be delivered the capacity building measures as set out in the approved plan	b. Capacity building measures to be provided throughout the implementation of the Project, as appropriate to the Project activities being undertaken and as described in the approved plan.	
MONITORING AND REPORTING		
C REGULAR REPORTING Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety performance of the Project. The E&S information can be provided standalone or as part of another Project report, provided the information provides as a minimum, summary information on: • the Project activities undertaken during the reporting period, including the status of E&S documents required under the ESCP; • the actions performed by the environmental and social specialist to ensure that the Project activities have proceeded in accordance with the E&S requirements (as set out in this ESCP and documents prepared pursuant to the ESCP), including: ○ meetings held with designers, contractors and supervision consultants; ○ documents prepared, reviewed and updated; ○ design reviews undertaken and issues raised; ○ supervision, site visits and inspections carried out and any issues noted. • any incidents or accidents that have occurred and the actions taken to investigate the causes; • status of complaints received by the grievance mechanism(s); • stakeholder engagement activities including meetings that have been undertaken; • any other actions taken relevant to ensure the project complies with E&S requirements; • any issues or challenges with E&S aspects, and areas where assistance from the Association is requested; and • the activities and actions that are expected to be delivered during the next reporting period.	Submit semestral reports to the Association throughout Project implementation, commencing on the Effective Date. Submit each report to the Association no later than 45 days after the end of each reporting period or within a time frame acceptable to the Association.	MoFEDYE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.	Submit the monthly reports to the Association upon request.	MoFEDYE
C	INCIDENTS AND ACCIDENTS Notify the Association of any incident or accident which is likely to have or has had a significant adverse effect on the environment, public/communities, or workers, including: death or significant injury; 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 SEA/ SH; or disease outbreaks. Provide available details of the incident or accident to the Association. Undertake or arrange for an appropriate investigation of the incident or accident to establish its immediate, underlying and root causes, and identify the relevant systems and processes for ESHS management that need review or strengthening to prevent recurrence. Prepare 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 to the satisfaction of the Association.	Notify the Association within 24 hours of learning of the incident, and details as available upon request. Provide to the Association's satisfaction an investigation report within 10 days of the date of the incident, and a Corrective Action Plan within 30 days of the date of the incident, unless a different timeframe is agreed to in writing by the Association.	MoFEDYE
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS a. Prepare a 'baseline scoping report for options analysis' to the satisfaction of the Association that collates baseline environmental and social information that will assist with: i. comparison of options and deciding which options should be taken to detailed design; ii. identifying the main risks and impacts to be addressed during the detailed design development and construction phases The report shall: iii. identify and describe the E&S features within and adjacent to the catchments; iv. provide details of relevant national planning and permitting requirements, and indicate the timelines needed to achieve each consent; and, v. indicate land ownership based on readily available information sources. vi. describe a process for the efficient, robust and justifiable selection of appropriate options to take forward under the Project.	a. No later than 60 days after the Effective Date. b. The E&S Assessment to be undertaken will be agreed at the time of option selection.	MoFEDYE

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
b. Prepare or cause to be prepared for the options to be taken forward to detailed design an Environmental and Social Impact Assessment, Environmental and Social Management Plan, and/or Environmental and Social Code of Practice (E&S Assessment), and if needed Resettlement Action Plan. The E&S Assessment to be prepared for each option will be agreed in advance with the Association, taking account of the scale of predicted E&S impacts, national requirements and ESF. The agreed E&S Assessment will be prepared in conjunction with the development of the design (to ensure that E&S issues are addressed within the design as far as practicable) and draw as appropriate on the WBG EHS Guidelines for identifying appropriate mitigation.		
1.2		MoFEDYE
MANAGEMENT OF CONTRACTORS a. Prepare to the satisfaction of the Association terms of reference for works supervision firms that detail their ESHS roles and responsibilities for ensuring construction works are implemented in accordance with the contract ESHS requirements. b. Incorporate to the satisfaction of the Association relevant aspects of the ESCP (including inter alia relevant requirements of the E&S Assessments, labor management requirements, stakeholder engagement activities, code of conduct etc.) into the construction works bidding documents into the E&S requirements of the procurement documents, and as necessary, indicate in E&S specification approaches and methods that may be acceptable to deliver the work to ESHS requirements. Incorporate E&S aspects into the procurement documents to indicate relevant experience and suitability of bidders for undertaking construction works in accordance with the E&S requirements. c. Thereafter ensure that the supervising firms and contractors undertake the works in accordance with their contractual requirements.	a. & b. During the preparation of the procurement documents and respective contracts. c. Throughout Project implementation.	MoFEDYE
1.3	Throughout the implementation of the Project	MoFEDYE
ESS 2: LABOR AND WORKING CONDITIONS LABOR MANAGEMENT PROCEDURES Ensure that workers are engaged in the implementation of the activities consistent with ESS2. To this end, ensure that the following measures are carried out:		MoFEDYE

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
i. 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. ii. 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 GIIP; iii. 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; iv. Develop a code of conduct for workers, which shall include measures to prevent and respond to SEA and SH cases; and v. Include these measures in the terms of reference or employer's requirements of Project consultants and contractors to ensure their implementation during the Activities.		
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
3.1 Relevant aspects of this standard shall be integrated into the <i>assessments and/or plans</i> prepared under 1.1 to promote the sustainable use of resources, avoid adverse impacts on human health and the environment from pollution, and avoid the generation of hazardous and non-hazardous waste production.	The same timeframe as 1.1	MoFEDYE
ESS 4: COMMUNITY HEALTH AND SAFETY		
4.1 Relevant aspects of this standard shall be integrated into the <i>assessments and/or plans</i> prepared under 1.1 to avoid impacts on community health and safety, take account of climate change, and assist in the response to emergency events.	The same timeframe as 1.1	MoFEDYE
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		
5.1 Relevant aspects of this standard shall be integrated into the <i>assessments and/or plans</i> prepared under 1.1 to avoid or minimize involuntary resettlement, or in a Resettlement Action Plan as agreed with the Association.	The same timeframe as 1.1	MoFEDYE
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES		
6.1 Relevant aspects of this standard shall be integrated into the <i>assessments and/or plans</i> prepared under 1.1 to protect and conserve biodiversity that may be directly or indirectly affected.	The same timeframe as 1.1	MoFEDYE
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES ESS 7 is not currently relevant.		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 8: CULTURAL HERITAGE			
8.1	Relevant aspects of this standard, including when chance finds procedures are required during construction works, shall be integrated into the <i>assessments and/or plans</i> prepared under 1.1 to protect and conserve cultural heritage.	The same timeframe as 1.1	MoFEDYE
ESS 9: FINANCIAL INTERMEDIARIES			
ESS 9 is not currently relevant.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	Update and implement the Stakeholder Engagement Plan (SEP) for the Project, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. To achieve these 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: - Identify the relevant stakeholders. - Provide stakeholders with information about the environmental and social risks and impacts of the Activities 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 pre-feasibility and feasibility options and other activities as required, through the MoFEDYE's, public display boards in their offices, and other platforms used by the MoFEDYE for stakeholder engagement. - 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 pre-feasibility and feasibility options and other activities as required. - Document and report on stakeholder engagement, including: (i) stakeholder mapping; (ii) summary of consultations and records of meetings held; (iii) feedback received and responses to said feedback; (iv) actions to engage disadvantaged or vulnerable groups. - Create and report upon indicators to measure stakeholder engagement and grievance resolution.	Update the SEP and redisclose by no later than 60 days after the Effective Date and prior to the commencement of civil works and thereafter implement the SEP throughout the implementation of the project. Documentation shall be provided to the Association through the regular reports under action C above, and any time frame acceptable to the Association upon written request.	MoFEDYE
10.2	GRIEVANCES		MoFEDYE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Establish the grievance mechanism as integrated in the SEP no later than 30 days after Effective Date and thereafter maintain and operate throughout Project implementation.	
	INDICATORS FOR IMPLEMENTATION READINESS The following actions are indicators for implementation readiness: A – (a) and (b) Organizational Structure completed 10.1 Updated Stakeholder Engagement Plan (SEP), if required. 10.2 Establish and operationalize Project Grievance Redress Mechanism (GM)		