

Grenada

OECS- Skills and Innovation Project - P179210

Draft

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

September 7, 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Grenada (the Recipient) will implement its respective parts of the OECS - Skills and Innovation Project (the Project) with the involvement of its Ministry of Education (MoE), as set out in the Financing Agreement. The International Development Association (the Association) 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 Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred 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, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the National Project Coordinator of Grenada's Project Implementation Unit. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Submit 6-month annual reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 45 days after the end of each reporting period.</p>	MoE
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within 10 days of the initial notice of the incident or accident.</p>	MoE
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association as annexes to the reports to be submitted under action A above.</p>	MoE
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project including one E&S specialist.</p>	<p>Establish and maintain a PIU as set out in the Financing agreement. Hire or appoint the E&S specialist for the PIU no later than 60 days after the Effective Date and thereafter maintain these positions throughout Project implementation.</p>	MoE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Incorporate E&S provisions for the Project as part of the Project Operations Manual (POM), consistent with the relevant ESSs. The provisions shall include, inter alia, an E&S exclusion list, E&S screening form, E&S Codes of Practice, an E&S Management Plan template and simplified labor management procedures (LMP).</p>	Submit the E&S provisions for the Association’s prior review and no objection prior to the finalization of the POM, and incorporate the E&S Provisions as part of the POM. Thereafter implement the E&S provisions throughout Project implementation.	PIU/MoE
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S provisions of the POM, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p> <p>Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p>	PIU/MoE
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	PIU/MoE
1.5	<p>CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC) FINANCING</p> <p>a) Ensure that the CERC Manual, as specified in the Financing Agreement, includes a description of the ESHS assessment and management arrangements, including the CERC ESMF, for the implementation of the CERC, in accordance with the ESSs.</p> <p>b) Adopt the CERC ESMF for activities under the CERC component of the Project, in accordance with the CERC Manual and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>a) The adoption of the CERC Manual in form and substance acceptable to the Association is a withdrawal condition under Section III.B.1(b) of Schedule 2 of the Financing Agreement for the Project.</p> <p>b) Implement the CERC ESMF in accordance with the terms, throughout Project implementation.</p>	PIU/MoE
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p>	Same timeframe as for the adoption and implementation of the POM.	PIU/MoE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Develop, adopt and implement the simplified LMP for the Project as part of the E&S Provisions of the POM, to be prepared under action 1.2 above, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.		
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, consistent with ESS2 and as described in the simplified LMP.	Same timeframe as for the adoption and implementation of the POM.	PIU/MoE
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures, including, inter alia, waste management measures to manage hazardous and non-hazardous waste, including electronic waste (e-waste), in the E&S Provisions of the POM to be prepared under action 1.2 above, consistent with ESS3.	Same timeframe as for the adoption and implementation of the POM.	PIU/MoE
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers and response to emergency situations, and include mitigation measures in the E&S provisions of the POM, to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the POM.	PIU/MoE
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
Not Currently Relevant			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Not Currently Relevant			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not Currently Relevant			
ESS 8: CULTURAL HERITAGE			
Not Currently Relevant			
ESS 9: FINANCIAL INTERMEDIARIES			
Not Currently relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Update, consult, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, 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.</p>	Submit the final SEP for the Association’s prior review and no objection, and thereafter adopt and disclose the SEP no later than 60 days after the Effective Date.	PIU/MoE
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>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.</p> <p>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.</p>	Establish the grievance mechanism along with the SEP, no later than 60 days after the Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	PIU/MoE
CAPACITY SUPPORT			
CS1	<p>Training shall be facilitated and provided as applicable and appropriate to PIU staff, Project workers, contractors and supervision firms on:</p> <ul style="list-style-type: none"> ● environmental and social requirements and implementation ● community health and safety. ● SEA/SH prevention and response measures ● emergency preparedness and response 	Training to be delivered throughout Project implementation.	PIU/MoE