



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 09/29/2022 | Report No: ESRSC03002



BASIC INFORMATION

A. Basic Project Data

| | | | |
|--------------------------------|--|--------------------------|----------------------------|
| Country | Region | Project ID | Parent Project ID (if any) |
| St Maarten | LATIN AMERICA AND CARIBBEAN | P177679 | |
| Project Name | Improving Mental Health Services in Sint Maarten | | |
| Practice Area (Lead) | Financing Instrument | Estimated Appraisal Date | Estimated Board Date |
| Health, Nutrition & Population | Investment Project Financing | 1/23/2023 | 3/23/2023 |
| Borrower(s) | Implementing Agency(ies) | | |
| Government of Sint Maarten | National Recovery Program Bureau (NRPB) | | |

Proposed Development Objective
Improve the capacity of mental health service delivery in Sint Maarten

| Financing (in USD Million) | Amount |
|----------------------------|-------------|
| Total Project Cost | 8.00 |

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The project has three main components: (a) improving the capacity of the Mental Health Foundation (MHF) to provide quality mental health care services by expanding and strengthening its physical infrastructure and human resources; (b) supporting the prevention of and addressing risky behaviors (substance abuse and alcohol consumption); (c) ensuring project management, monitoring and evaluation.

D. Environmental and Social Overview



D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The proposed project will consist of three components: (a) support the strengthening of the national mental health sector; (b) improving the capacity of the Mental Health Foundation (MHF) to provide quality mental health care services by expanding and strengthening its physical infrastructure and human resources; (c) ensuring project management, monitoring and evaluation. No Contingent Emergency Response Component (CERC) is envisioned at Concept Note stage.

Component 1 will provide training to key mental health service providers and other stakeholders such as law enforcement officers regarding mental health issues and services; strengthen existing and develop new treatment and referral protocols as needed; promote mental health; and explore supporting legislative changes to address gaps in mental health service delivery including the ineligibility of substance abuse treatment for funding through the Health and Social Insurance Fund (SZV).

Component 2 will finance the construction of a mental health facility for the Sint Martin Mental Health Foundation (SMHF). The 6,267 square meters facility will be located in a flat land in the St. Johns area, about 4 kilometers north west of Phillipsburg.

The location of the new mental health facility is in a new estate in Sint John which is a residential area within the Cul de Sac district. The Cul de Sac district is mainly a residential area with access to a main road- the LB Scott Road. The site is located next to public facilities and abuts an apartment building, a school, and opposite there is a care facility for the elderly and the physically disabled- the Yellow and White Cross Foundation. The new building will be built on flat, undeveloped, uninhabited land with a total size area of 6,267 square meters with access to water, electricity, and sewer lines. Infrastructure must comply with existing land use planning, building codes and construction permits that the Ministry of Infrastructure, Environment and Spatial Planning (VROMI) has in place. The site for the new facility is not currently zoned, however draft zoning demarcation for the site shows that the intended planned use is “mixed-use”.

This component will finance works and care service provision for individuals with chronic mental health illnesses, day treatment, and crisis intervention rooms; staff development; and strengthening existing and developing new treatment protocols. This component will include civil works as well as technical assistance to develop sustainable financial mechanisms. The designs will also consider climate-smart options where possible. The project’s beneficiaries are people with mental illness and their families living on the island of Sint Maarten.

Component 3 will support all activities related to project management and coordination.

D. 2. Borrower’s Institutional Capacity

The National Recovery Program Bureau (NRPB) will be the Project Implementing Unit (PIU). The NRPB will be responsible for project management and coordination, including M&E and reporting, procurement, financial management, environmental and social risk management, and citizen engagement. The Bank has been engaging with



NRPB since 2018 and NRPB has gained experience with the Bank's ESF policies and requirements. NRPB has demonstrated improved capacity in managing and implementing projects financed by the Sint Maarten Hurricane Irma Reconstruction, Recovery and Resilience Trust Fund and administered by the World Bank. The NRPB has a large and experienced team to support portfolio management.

The Bureau consists of qualified project coordinators, procurement specialists, environmental specialists, social specialists, and communication specialists. NRPB has recruited a dedicated project manager for this project. The World Bank anticipates that additional staff is needed to manage the social risks of the project. The level of effort required (i.e., full time or part time), the depth of experience and the type of expertise needed will be decided on during project preparation and this will be included in the ESCP. The position of program manager is currently being recruited.

The Bank has recommended that the client add additional capacity to the project team during preparation to provide support to early consultations.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Moderate

The environmental risk for this project is moderate at the concept stage. The main environmental risks and impacts of the project are related to the construction of the new facility. Some traffic disturbance, dust and noise pollution from construction might occur during works where the facility will be located. These risks will be localized, temporary and managed through guidance of the environmental risks management instruments to be developed according to the Bank's ESF. Given the nature of proposed works, there is no need for dedicated environmental specialists for the project as the current NRPB safeguards team is expected to provide sufficient support throughout the project life cycle in all aspects pertaining environment and occupational health and safety.

Social Risk Rating

Substantial

The social risk for this project is rated as substantial. The project's interventions are designed to have direct positive social impacts as they will provide needed support to the country's mental health system through improvements in physical infrastructure and human capital. Project activities however may generate the following social risks: uncertainty about the availability and access to improved services; concerns about the location of the new facility possibly perceived by neighboring residents and the adjacent school; and stretched social capacity within the PIU which effects their ability to anticipate, identify, and respond to sensitive issues and to conduct meaningful consultations with the target beneficiaries. These risks are manageable, if addressed early, throughout implementation, and with the suitable expertise. The project will explore through its stakeholder engagement process the barriers to accessing care and approaches to alleviating them. Likewise, consultations on the mental health facility's location will need to begin during project preparation and be led by the NRPB. This is because the potential for neighborhood objections derailing the local approval process needs to be assessed, and because generally having early engagement with the neighbors of a construction site will build a positive relationship. The proposed location of the mental health facility, which will include long term housing for chronically mentally ill persons in the largely



residential area of Sint John, will require carefully planned community engagement with residents and the adjacent school. Given the increasing number of project NRPB is managing, the staffing needs will be assessed during project preparation to ensure adequate level of consultations and engagement with key stakeholders. Given the size of the current portfolio the proposed project will need to strengthen the NRPB's capacity around community engagement and social risk management, with the specific approach to be identified during early preparation. The extent to which the NRPB's social team needs to be bolstered will partly be based on the skill set of the person recruited for the project manager role, particularly if this position is filled by an individual with a strong understanding of mental health issues and engaging around this topic.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The overall risks expected for the project are associated with the construction of the new facility which include disposal of construction waste, traffic disturbance, dust, and noise pollution. The construction of the expansion site may also affect the health and safety of the people living in the proximity of the construction sites as well as SH/SEA risks. There is also risk of spread of COVID-19 and other communicable diseases in the neighboring areas from project works during construction.

The environmental risks and potential impacts will likely be moderate, site specific, limited to immediate surroundings, and can be managed through implementation of specific mitigation measures. During project preparation, the NRPB will need to carry out an environmental and social screening of the works and assess specific potential risks and mitigation measures. The screening will also assess the relevance of each of the Environmental and Social Standard (ESS). The NRPB will incorporate in the screening and mitigation measures the applicable ESSs, the standards from Government of Sint Maarten (GOSXM), World Bank Group Environmental Health and Safety Guidelines, and specific Environmental and Social Guidelines for Health Care Facilities. The national legislation in Sint Maarten is weak in terms of assessment and management of environmental and social risks and impact. As such, this project will follow the Bank's ESF requirements and develop an Environmental and Social Management Plan (ESMP) for the works in Component 2. The mitigation measures will be reflected in the ESMP and in the detailed designs of the facility. The draft ESMP will be prepared and disclosed prior to appraisal for purposes of public consultations and then it will be finalized, adopted, and disclosed before negotiations for the Project.

Regarding screening for social risks and impacts, the project is expected to provide social benefits by improving and rebuilding services for persons with mental illness across the country. The national health insurance scheme includes a category for indigent patients and the MHF has a policy of not turning away patients. There is nonetheless the possibility that exclusion arises from screening type statements on the MHF website regarding requirements for making appointments, these are: referral letter from a General Practitioner, valid ID or Passport, and a valid insurance card from SZV or private insurance. While such requirements are typical for government financed health care they may also present barriers to seeking care which for some are not overcome easily. These barriers and methods to alleviate them will be explored as part of stakeholder engagement and will be described in the ESMP and other relevant instruments.



The Mental Health Foundation as the main provider of mental health service in Sint Maarten and the NRPB will prepare as part of the SEP a detailed analysis of the beneficiaries and from this design targeted methods for meaningful engagement with them during project preparation and implementation. All consultations for the project will follow all necessary World Bank and in country COVID-19 protocols, if there is a low infection rate on the island, meetings could be carried out in-person in small groups provided they meet such protocols, and these could be complemented with virtual meetings.

The current capacity within the PIU to design and lead such consultations is limited. Current social staff are very stretched on other projects under preparation and implementation, however, the PIU has been able to assign a social specialist to this project. There is a need for that person to begin connecting with the school and other neighbors around the new facility, and to design and begin consultations with beneficiary groups including those with mental illness, so that results can feed into project design before appraisal. Given the delicacy of conducting such consultations with persons who may have a mental illness, consultations will need to be guided by specific protocols and involve a person experienced with this population; this expertise has yet to be identified.

Areas where “Use of Borrower Framework” is being considered:

The use of the Borrower Framework will not be considered for this project.

ESS10 Stakeholder Engagement and Information Disclosure

Under component 2 the project’s main beneficiaries will be patients of a new mental health facility, their families, and the staff who will work at the facility. These are the primary stakeholders in addition to the Ministries and other foundations who work on mental health and substance abuse reduction activities in the country. Other important stakeholders are those who use and live in the residential neighborhood of St Johns where the new facility will be built. These stakeholders include a school community, those who live in homes in the estate, a few small businesses, and the Sister Basilica Center which is a residential care facility of the White and Yellow Cross Care Foundation which is also located in the estate.

During project preparation the NRPB will need to communicate the project activities with these beneficiaries and stakeholders while taking into account the COVID-19 related restrictions and prevention protocols. The conduct of consultations will be guided by the “Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings March 20, 2020”.

Particular efforts will need to be made to consult and gather the thoughts of project beneficiaries (patients and staff) on the needs they have for the short and long term care facility, as well as their experiences within the mental health system to inform the development of patient protocols. These meetings need to be led by someone experienced working with those who have mental illness and who has the skills to translate beneficiary feedback into options for project improvements, this specific experience has yet to be identified. The residents and school community surrounding the site for the new facility will need to be fully identified for early and ongoing engagement. In addition



to the construction impacts there may be specific concerns around the location of the facility and these need to be identified and mitigated.

During project preparation the NRPB will develop a Stakeholder Engagement Plan (SEP) which will detail the characteristics and interests of the relevant stakeholder groups as well as the timing and methods of engagement for each throughout the life of the project, and in alignment with key events on the design and construction of the new facility. Important engagements will occur prior to appraisal, and depending on the nationwide mobility restrictions, virtual consultations could be an acceptable approach for some public engagement on the project, but this will need to occur alongside targeted meetings with both the beneficiaries (staff and patients) and stakeholders in the residential area. Many of the mental health patients will be also be vulnerable so tailored approaches will be provided in the draft SEP for this group.

A draft SEP for consultations will be prepared and consulted with stakeholders during project preparation, consultation will include public disclosure of the SEP. Stakeholder analysis will identify those stakeholders at risk from not being reached easily by consultations and specific methods will be identified. This would likely be the elderly and speakers of languages other than Dutch or English. Consultations with stakeholders and beneficiaries will begin prior to project appraisal and results will be documented in the appraisal stage SEP. The final SEP will be submitted to the World Bank for clearance before project negotiations.

All E&S documents/reports will be made accessible to project stakeholders and will be publicly disclosed prior to the conclusion of project appraisal on the website of the NRPB which is already functioning.

The project will benefit from the existence of the functioning Grievance Redress Mechanism which serves all projects being implemented by the NRPB, this is currently being updated and should be finalized by the time this project goes to appraisal. The existing GRM has been in place since the NRPB was established and since this time has received and processed complaints effectively with designated staff in key roles. While there are multiple means for submitting a grievance, the process needs to be improved to make submitting anonymous complaints easier, and concrete business standard for handling the complaint and responding to complainants need to be put in place. The approach for handling complaints relating to gender-based violence and sexual harassment will be included in the updated GRM.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

ESS2 is relevant. Staff working in the NRPB and assigned to this project are civil servants and will retain their civil servant contracts, and as such ESS2 requirements applicable to civil servants will apply. The project will also involve direct and contracted workers, including contractors, subcontractors and design and supervision services for the civil works proposed under component two. Similar to other projects that include construction of works that NRPB manages the contractor workforce is expected to be hired locally except for a few skilled workers who may come from the region or internationally, as such labor influx and the associated risks are not anticipated. Direct workers



will also include full-time and part-time consultants employed by the NRPB for different activities associated with project design and implementation.

Labor Management Procedures (LMP) will be prepared by the NRPB during project preparation. NRPB will submit a draft LMP before project appraisal and a final before project negotiation. This LMP will specify the terms and conditions of employment, non-discrimination and equal opportunities, workers' organizations, measures against child and forced labor, occupational safety and health measures for the workers, and provisions to prevent and manage SH/SEA risks. A grievance redress mechanism for labor disputes is already developed as part of the NRPB's update to their program wide GRM which is expected to be finalized during the preparation of this project.

The project will also require contractors to prepare labor management procedures for the management of their workers and such requirement will be specified in the request for bids for the works to be implemented. The procedures will require contractors to include standard industry codes of conduct, which includes measures to prevent sexual harassment/sexual exploitation and abuse (SH/SEA).

Community workers are not expected to be involved in the civil works for the new mental health facility, however this will need to be verified during project preparation.

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS3 is relevant. The ESMP for the civil works will address the risks and impacts from construction, disposal of construction waste, energy and resource efficiency to ensure the implementation of the works adhere to the safety measures in this standard. The ESMP will also include mitigation measures for dust, traffic, wastewater, solid waste, and hazardous waste management and final disposal of medical waste and hazardous material.

ESS4 Community Health and Safety

ESS4 is relevant. The construction of the expansion site might affect the health and safety of the people living in the proximity of the construction site. Hence, the requirements of ESS4 as well as the World Bank Group Environmental Health and Safety guidelines will apply. These requirements will be set out in the ESMP to ensure safety and accessibility of infrastructure (including universal access design), management of the nuisance impacts of construction, road safety management, and matters related to workers' conduct including to prevent SH/SEA risks.

The potential issue of construction workers engaging with residents or the neighboring school will need to be addressed through codes of conducts with the workers. This will be stipulated as a requirement of the contractors bidding documents.

To address the potential spread of COVID-19 and other communicable diseases in the neighboring areas from project works during construction, the contractor and any subcontractors will be required to have in place strict health and safety protocols, including on COVID prevention, when its work force engages with the neighboring community in adherence with local guidelines. As such, COVID-19 prevention measures will follow applicable World Bank guidance



as well as Government of Sint Maarten prevention guidelines which are based on the guidelines provided by the Kingdom of the Netherlands.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

ESS5 is not currently relevant. At the current stage of preparation, no land acquisition and/or restrictions on land use and/or involuntary resettlement are expected under this project. Component 2 will finance new construction, but the construction will be done on a plot already owned by the Mental Health Foundation and which does not have any informal or formal occupants. This will be further reconfirmed during project preparation.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is not currently relevant for the project. The proposed Project will neither finance nor support any civil works or policies that might affect biodiversity or management of living natural resources.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

ESS7 is not currently relevant for the project. The country does not have people who are considered Indigenous Peoples under ESS7.

ESS8 Cultural Heritage

ESS8 is relevant. The site of the new building is clear of vegetation but is in close proximity to the Emilio Wilson Estate, an old sugar plantation which is part of the SXM Historic Site. The ESMP shall include a clear chance find procedure so that potential artifacts are managed properly, if encountered.

ESS9 Financial Intermediaries

Not currently relevant for the project. No FI are considered for this project.

B.3 Other Relevant Project Risks

none.

C. Legal Operational Policies that Apply

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|--|----|
| OP 7.50 Projects on International Waterways | No |
| OP 7.60 Projects in Disputed Areas | No |

Public Disclosure



III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

None

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

Preparation, disclosure, and consultation of the following draft instruments before project appraisal:

1. Draft Environmental and Social Commitment Plan (ESCP).
2. Draft Stakeholder Engagement Plan (SEP), including Project Grievance Redress Mechanism (GRM).
3. Draft Environmental and Social Management Plan for the Project (ESMP).
4. Draft Labor Management Procedures (LMP).

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

1. During project implementation, update the ESMP with the terms of reference for detailed technical designs of the Mental Health Facility.
2. Request for bids for works under Component 2 to require contractors to develop a site specific Contractor-ESMP.
3. No works will start until consultation with beneficiaries have taken place.
4. Quarterly monitoring and reporting on ESF project issues.
5. ESMP to be finalized, adopted, and disclosed by negotiations.
6. SEP to be finalized, adopted, and disclosed by negotiations.
7. LMP to be finalized, adopted, and disclosed by negotiations.
8. Full time Social Specialist in the PIU appointed and in place for preparation or before implementation depending on staffing make up.

Public Disclosure

IV. CONTACT POINTS

World Bank

| | | | |
|---------------|-------------|--------|--------------------------|
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Borrower/Client/Recipient

Borrower: Government of Sint Maarten

Implementing Agency(ies)



Implementing Agency: National Recovery Program Bureau (NRPB)

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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|-------------------------------|---|
| Task Team Leader(s): | Ana Mercado |
| Practice Manager (ENR/Social) | Maria Gonzalez de Asis Recommended on 26-Sept-2022 at 09:31:38 GMT-04:00 |
| Safeguards Advisor ESSA | Angela Nyawira Khaminwa (SAESSA) Cleared on 02-Feb-2022 at 21:10:30 GMT-05:00 |