



ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN
FOR
THE CONSTRUCTION OF A BOX PARK AS PART OF THE CASTRIES MARKET
REDEVELOPMENT PROJECT

Ministry of Tourism, Information and Broadcasting,
Culture and Creative Industries |
| February 2021 |

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ACRONYMS AND ABBREVIATIONS

ARAP	Abbreviated Resettlement Action Plan
BOQ	Bill of Quantities
CBD	Central Business District
CCC	Castries Constituency Council
CDC	Castries Development Complex
CFP	Chance Finds Procedure
DCA	Development Control Authority
DOI	Department of Infrastructure
DOF	Department of Fisheries
EA	Environmental Assessment
EHD	Environmental Health Department
EMF	Environmental Management Framework
EMP	Environmental Management Plan
ESHS	Environmental Social Health and Safety
E&S	Environmental and Social
GRM	Grievance Redress Mechanism
H&S	Health and Safety
LUCELEC	Saint Lucia Electricity Services Ltd
MOA	Ministry of Agriculture
MOE	Ministry of Equity
MOT	Ministry of Tourism, Information & Broadcasting, Culture & Creative Industries
NEMO	National Emergency Management Organisation
ORTCP	OECS Regional Tourism Competitiveness Project
OSH	Occupational Safety and Health
PIU	Project Implementation Unit
PSC	Project Steering Committee
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SSO	Social Safeguards Officer
SLSWMA	St. Lucia Solid Waste Management Authority
PCR	Physical Cultural Resources
PPD	Physical Planning Department
PPE	Personal Protective Equipment
TOR	Terms of Reference
USD	United States Dollars
WASCO	Water and Sewerage Company

1.0 INTRODUCTION

Financing has been secured from the World Bank, towards the implementation of the OECS Regional Tourism Competitiveness Project (ORTCP). The Project principally aims to improve selected tourist sites in Castries. In this regard the Government of Saint Lucia (GoSL) has identified the Castries City Tourism Product as a priority for Saint Lucia with targeted investment sites and activities aimed at making downtown Castries more pleasant and attractive to tourists as well as to Saint Lucian residents. Therefore, as part of the ORTCP, the Government of Saint Lucia intends to implement several investment initiatives to revitalize downtown Castries.

In keeping with this intention, the GoSL has prioritized the Castries Market and its environs as a pull factor with tremendous potential to increase the number of visitors in the Castries city centre. Notwithstanding its potential, the GoSL has recognized that in order to fully leverage the opportunities for increased visitation by both locals and visitors, the Castries Market needs to be revitalized in order to become one of the city's most visited spots.

The scope of the overall Castries Market Redevelopment Project includes: the rationalization and revitalization of the iconic market, creation of covered vending stalls, rationalization of the open vending area, construction of a meat and fish market, and the creation of a box park. The underlying aim is to improve the general circulation, security features and aesthetics of the market compound to increase its attractiveness and appeal.

Project Description

The proposed construction of a Box Park is one of several components of the Castries market redevelopment and falls under the second phase of the redevelopment plan aimed at modernizing the city's competitiveness. The Box Park will be a two-storey rectangular structure designed to be implemented quickly with the intention of meeting the needs of vendors offering a diverse range of leisure services.

The box park will measure approximately 11,793.24 square feet. The ground floor will measure 5,864.65 square feet while the first-floor will measure 5,928.59 square feet.

The ground floor will consist of the following:

1. Sixteen (16) convenience shops
2. Eight (8) fish vending Shops
3. Six (6) meat Vending Shops
4. Two (2) Accessible toilets and a janitors' closet
5. Electrical and mechanical closets

The first floor will consist of a combination of twelve (12) shops (bars and restaurants), male and female toilets including two (2) accessible toilets and dining and circulation spaces. The two-storey structure will consist of a handicap friendly lower storey constructed with an insitu reinforced concrete column and beam frame with eight inch (8") thick structural reinforced block walls on the perimeter and 6 inch (6") thick structural reinforced block walls internally.

The foundation will be a six inch (6") thick grade supported insitu reinforced concrete raft slab with thickenings under the columns and block walls. The raft will be supported by compacted engineered fill material with a safe bearing capacity of four hundred kilonewton square meter (400kN/m²).

The upper storey will be made from eight (8) prefabricated forty (40) foot metal containers which will be securely bolted to the six inch (6") thick first floor insitu reinforced concrete slab. The prefabricated containers will be insulated and arranged in groups of two allowing for covered circulation space along the center, linked to three covered court yard spaces intended for public gathering and dining. The circulation areas between the containers are sheltered from the elements by a shed roof consisting of structural steel roof trusses, metal sheeting and insulation.

The structure has been designed to resist vertical dead and live loading, plus lateral loads from seismic forces and hurricane force winds.

2.0 PROJECT SITE

The iconic Castries Market was built in 1891 by Liverpool Engineers Bruce & Still Ltd. and opened to patrons in 1894. The Market was subsequently extended and remodeled in the early 1990's by the GoSL. The Castries Market is managed by the Castries Constituency Council (CCC) which is at the forefront of the efforts to enhance the City and will be integrally involved in every stage of project implementation.

The site for the construction of the Box Park is within the footprint of the Castries Market Complex. The Castries Market houses the Castries Craft Market, the Provisions Market and the Fish Market, there are also nine (9) small units which sell a variety of dry goods and provide salon services on the eastern boundary of the site. The Box Park structure will be located in the area directly behind these huts which means that there is need for relocation of these structures. Also, in proximity to the site for the construction of the Box Park is a Minibus Terminal which serves as the drop-off and pick-up point for four different bus routes.

Further east is the Conway Car Park Building, which houses a Massy Supermarket, and a number of Government offices. The buildings on the Castries Waterfront where the Government's main administrative zone is located, where offices such as the Prime Minister's Office and the Offices of a number of other Government Ministers are housed, is within a distance of forty to fifty metres.

The Independence Monument which was erected in 2019 located at a roundabout on the John Compton Highway and the Castries Harbour are approximately twenty metres away. Pointe Seraphine a major cruise ship port is more distantly located but is quite visible from the Market Complex.

The Market is the heartbeat of Castries, a hive of activity, where the talent of the best artisans is on showcase, and provision vendors from all across St. Lucia come to trade their produce, and for that reason should be a "must see" for all visitors to the city. The enhancements planned as part of the Castries Market Redevelopment will undoubtedly contribute to that outcome.

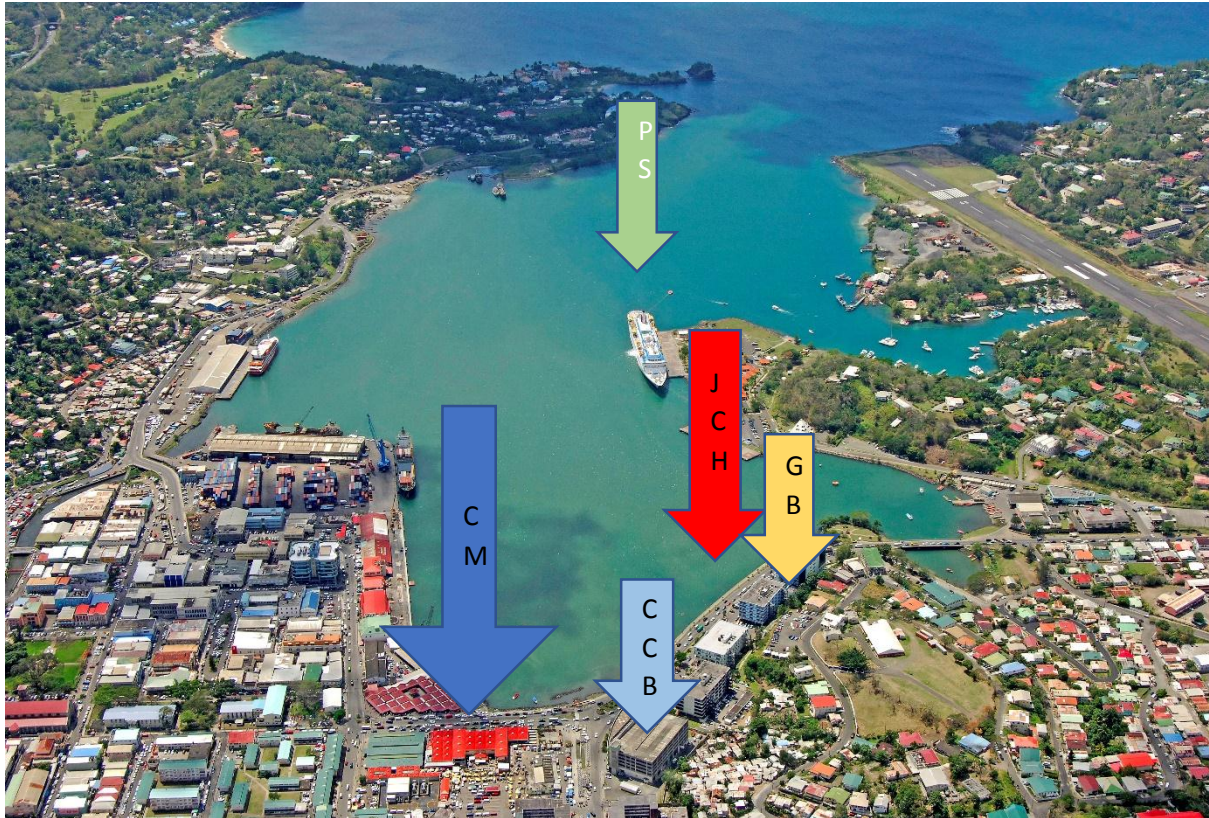
CHARACTERISTICS OF THE SITE

The Castries Market is a hubbub of activity in the city centre, with vendors from the length and breadth of the country congregating throughout the week and even larger numbers on Saturday, which is the traditional market day, to sell their goods. For this reason, the Market is always a hive of activity with patrons and vendors haggling over the price of locally grown provisions. However, the Market is more than a location for buying and selling of goods, it's also a place where people socialize and network, as vendors from rural communities reconnect with family members and friends who have migrated to the city.

Because it occupies such a strategic position in the city, directly opposite the Castries Waterfront, *see photo 1 below*, the Market is a huge tourist attraction, particularly for cruise visitors, who walk through the area coming from and going back to the main cruise ship port. The very busy John Compton Highway, runs along the front of the Market Complex and branches out into smaller streets such as Jn. Baptiste Street *see photos 2 a and b below*, which runs directly along the project site and further along to Darling Road.

The GoSL has completed a first phase of the Castries Market Redevelopment with the construction of the new Provisions Market in 2020, *see photo 3 below*, and is now seeking to continue the redevelopment of the Market with the construction of the Box Park. The enhancements planned as part of the Castries Market Redevelopment will undoubtedly contribute to the outcome of making the Castries Market a "must see" spot for locals and visitors alike.

Photo 1. Castries Harbour showing location of project site



CM - Castries Central Market Site – Site for Construction of a Box Park

CCB - Conway Carpark Building

JCH - John Compton Highway

GB - Government Buildings

PS – Pointe Seraphine Cruise Ship Berth



Photo 2 a: A roundabout at the John Compton Highway, which branches off into Jn. Baptiste Street which runs directly along the project site and the location of the vending huts to be relocated



Photo 2 b Sections of Jn. Baptiste Street with a view of the Castries Carpark and the vending huts to be relocated to accommodate the construction of the Box Park



Photo 3: The Bus Terminal and new Castries Provision Market in the background

3.0 THE LEGAL AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL MANAGEMENT

In Saint Lucia, a number of Government and statutory agencies have responsibility for environmental management in one form or another under various pieces of legislation.

The following provides a general overview of the agencies, laws and regulations pertaining to various sections that have relevance to environmental management and as well as to disaster mitigation. They cover such areas as environmental, land use, water management, domestic, commercial, and hazardous waste management, historical and cultural patrimony, public health, and disaster response.

Table 1 below summarizes a number of pertinent agencies, their responsibilities, and enabling legislation.

Table 1. Agencies with Environmental Management Responsibilities

Agency	Responsibility	Legislation
Department of Physical Planning	This Ministry has responsibility through the functions of its various departments/ sections which impact directly on the management of the country's natural resources. As such it has the authority to request an Environmental Assessment for any developmental activity. The Ministry is also responsible for the implementation of the Saint Lucia Building Codes and guidelines which are supposed to provide guides for best construction practices.	The Physical Planning and Development Act No 21 of 2001
Development Control Authority (DCA)	The DCA is made up of a government appointed Board of various professional interest and main technical government offices which also includes the Chief Engineer of the Department of Infrastructure or his representative. The Board of the DCA has the power to review and decide on development proposals that are brought to it by its technical secretariat, the Physical Section of the Ministry of	The Physical Planning and Development Act No 21 of 2001 (amended 2005) which superseded the 1971 Land Interim Development Control Act.

	Physical Development. The relevant Act provides the legislated authority 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. The final decision on an EIA is made by the Board of the Development Control Authority (DCA) who may approve the EIA with its recommendations and measures, along with the recommendations and measures of the referral agencies.	Amendments to the 1971 Land Interim Development Control Act
Ministry of Health,	Through its Environmental Health Department, it has the responsibility for reviewing plans, monitoring and enforcing public health and sanitation regulations and practices, and promoting public awareness on matters relating to public health and the environment. These include practices that affect health such as food preparation, sanitation, solid waste management, liquid and solid waste disposal, dust and air pollution, water quality, some occupational health and safety matters.	Public Health Act of 1975 and attendant Regulations to present. No. 10, 11, 12, 13, 14, 15, 16, 18, 20, 21, and 22 of 1978]:Public Health [Nuisances] Regulations. Public Health [Offensive Trades] Regulations: Public Health [Communicable and Notifiable Disease] Regulations: Public Health [Water Quality Control] Regulations: Public Health [Apartment Houses, Guest Houses and Hotels] Regulations: Public Health [Swimming Pools] Regulations: Public Health [Disposal of Offensive Matter] Regulations: Public Health [Sewage and Disposal of Sewage and Liquid Industrial Waste Works] Regulations
Pesticides Control Board (in the Ministry of Agriculture)	Pesticides Control Board in the Ministry of Agriculture and is responsible for monitoring the importation and use of various chemical substances.	The Pesticides and Toxic Chemicals Control Act 1975
Saint Lucia Solid Waste Management Authority	A statutory authority with the responsibility for providing a coordinated and integrated systematic approach to collection, treatment, disposal, and recycling of wastes	The Saint Lucia Solid Waste Management Authority Act No 8 of 2004,

	including hazardous wastes. The Authority is also responsible for the management of two sanitary disposal sites, one in the north at Deglos, and the other in the south in Vieux Fort.	Amendment of No 10 of 2007
Saint Lucia National Trust	The Trust is a statutory body established in 1975 and has responsibility for the conservation and management of buildings and objects of historical and architectural value as well as areas of natural and scientific importance. Because it is charged with protecting and promoting natural and cultural heritage it manages sites such as the historical Pigeon Island National Landmark and the Maria Islands Nature Reserve. The Trust has developed the System Plan for Saint Lucia, and is also trying to document and preserve the Architectural Heritage of Saint Lucia. While the Trust is a referral agency for the DCA, it is also very vocal on matters where it believes the matter of national heritage or preservation is threatened.	The Saint Lucia National Trust Act of 1975

As per World Bank Safeguards Policies, the ORTCP is classified as category B, meaning that any negative environmental impacts are site specific, few if any of them are irreversible and in most cases mitigation measures can be designed more readily than for projects with major adverse negative impacts. The following Safeguard Policies have been triggered under this project activity:

The World Bank Safeguard Policy OP 4.01 for Environmental Assessment (EA) - to help ensure the environmental and social soundness and sustainability of the project. An environmental screening exercise was conducted to determine the appropriate extent and type of environmental assessment (EA) so that appropriate studies are undertaken to determine the direct and indirect environmental impacts of the project and to recommend mitigation measures.

OP: 4.12 Involuntary Resettlement - to assess all viable alternative project designs to avoid, where feasible, or minimize involuntary resettlement and where this is not feasible, to assist displaced persons in improving or at least restoring their livelihoods and standards of living in real terms relative to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

OP 4.04 Natural Habitats - to promote environmentally sustainable development by supporting the protection, conservation, maintenance, and rehabilitation of natural habitats and their functions. It is advised to use a precautionary approach to natural resources management to ensure opportunities for environmentally sustainable development, and to determine if project benefits substantially outweigh potential environmental costs.

OP 4.11 Physical Cultural Resources - to assist in preserving physical cultural resources and avoiding their destruction or damage. PCR includes resources of archaeological, paleontological, historical, architectural, religious (including graveyards and burial sites), aesthetic, or other cultural significance. An environmental screening exercise was used to identify PCR and prevent or minimize or compensate for adverse impacts and enhance positive impacts on PCR.

All these Impacts have been identified and site-specific mitigation measures are presented in this Environmental and Social Management Plan (ESMP), and in other relevant safeguards documents.

4.0 SITE SPECIFIC ENVIRONMENTAL AND SOCIAL IMPACTS

The Construction of the Box Park sub-project can be categorized as a Category B project. A Category B project has potential adverse environmental impacts on human populations or environmentally important areas, such as coastal marine areas and other natural habitats which are less adverse than those of Category A projects. These impacts are site specific; few if any of them are irreversible; and in most cases mitigation measures can be designed more readily than for Category A projects. The implementation of appropriate mitigation and management measures will assist in reducing any potential negative impacts from the construction of the Box Park. Table 5 below outlines a number of measures which the contractor has to adhere to in order to mitigate social and environmental impacts. Additionally, the Environmental and Social (E&S) Requirements will be included in the Bidding Documents and Contract to ensure that the contractor complies with the requirements.

The major sensitive receptors in very close proximity to the site are the Camilla Alexander Fish Vending Facility, the Castries Provision Market, with over 100 booths, and the bus terminal which serves the La Clery, Babonneau, Bisee and Monchy bus routes. Pre- Covid 19, during the slowest part of the work day, there were more than 40 buses parked in the area near the project site as well as the drivers who usually sit in their buses or congregate in small groups at different points in the terminal, which is mainly an open area with a very small covering which can accommodate one or two buses at a time. Given the current situation with congestion of minibuses along the streets in the city it is unlikely that the bus terminal can be relocated during construction. Further, there are no plans to relocate the vendors who were displaced between 2019 and 2020 to accommodate the construction of the provision market and have since returned to operate at the new provisions market. For this reason, mitigation measures such as the development and implementation of a traffic management plan, and a site management plan, including provisions for pedestrian movement, and use of hoarding and signage is paramount to ensure the safety and security of the vendors, the bus drivers, their clients and their property and the general public.

Measures to mitigate noise and dust pollution will also be important to ensure that the major stakeholders, the vendors, the bus drivers and the contractor can operate with minimal disruptions to each other's activities.

The site for the project is located in a rather busy area in the city, both for vehicular and pedestrian traffic. The John Compton Highway which is the main link road between Castries and Gros Islet to the North runs directly to the west of the project site, and Jn. Baptiste Street which branches off from the John Compton Highway and runs along the eastern boundary of the site. The environmental and social mitigation measures as listed in table 5, dealing with the use of roadways, traffic congestion, pedestrian safety, damage to existing road infrastructure, and the deposit of soil and sedimentation on the roadway will have to be implemented to safeguard this existing infrastructure. Since the general area surrounding the site is also heavily trafficked by pedestrians, measures such as hoarding and the use of signage as well as measures to reduce noise and air pollution are paramount, public notices will also be aired on television and radio to inform all users of the market of ongoing works.

To ensure that the other sensitive receptors in proximity to the site, mainly the government offices and residential apartment buildings near the site *see photo 4 below*, will not be unduly affected during construction, the contractor will follow specific guidelines outlined in Table 5 below, regarding noise and dust pollution during their operations and the impacts on these receptors, but other measures such as consultation with the various stakeholders, through formal correspondence as well as notices on radio and television will be used to keep stakeholders informed of the project generally and activities that may create inconvenience beyond what is expected during normal construction work.

The Castries Harbour is located in close proximity to the project site, although a section of the Provision Market and the John Compton Highway which runs directly to the front of the site acts as a buffer separating the waterfront from the site. For this reason, the likelihood of pollution of the marine environment is reduced. However, the contractor will also adhere to guidelines in Table 5 below to further reduce that occurrence especially because the area is prone to flooding during heavy rains.

During construction, there is a possibility for the temporary relocation of at least 17 vendors including dry goods, provision and coconut vendors who do not operate from the new provision market but who use the huts along Jn. Baptiste Street, trucks and vans which are parked on the project site for trading.

Broad consultation spearheaded by the CCC and supported by the ORTCP Safeguards Officer and Communication Officer, will be held. Among the groups to be consulted are the Vendors and Minibus

Drivers’ Associations, the National Council on Public Transportation, the Transport Board and the residents in the project area. Due to the existing Covid-19 situation where gatherings are limited to ten persons, consultations in small-group sessions of no more than ten persons will be held utilizing social distancing protocols. If in-person meetings are not permitted, meetings can be conducted through platforms such as Zoom and Skype. The contact information for the Social Safeguards Officer will be provided to the major stakeholders to allow them an easily accessible channel for expressing concerns about the project. A television and radio publicity drive will be used to keep users of the provision market and of the bus service, as well as the general public and more specifically persons in vulnerable groups such as persons with disabilities informed of the progress of construction activities as well as to promote the Grievance Redress Mechanism (GRM).



Photo 4 – One of the CDC Residential Apartments near the project site

The table below provides a list of other site specific potential environmental and social impacts:

List of Potential Environmental and Social Impacts

Positive Impact	Employment opportunities created both during construction and operations of the new facility
	Construction of restrooms which will contribute to improving the sanitary conditions of the area
	Improved amenities to facilitate increased social activity and recreation by residents and tourists
	Improved vending facilities and improved aesthetics
Negative Impacts	Increased vibration and noise level during civil works disturbing users of the market, bus terminal, residents and employees in nearby offices and businesses.
	Potential for increase road safety issues for pedestrians, particularly the elderly and children, the disabled, and motorists.
	Reduced air quality (cement, dust, sand and other construction material, in addition to fumes that may affect workers on the site, residents, vendors, bus operators and commuters and occupants of nearby offices)
	Increased waste generation
	Potential for pollution of the marine resource.
	Traffic delays/congestion caused by road detours or closures during the works, especially for the buses using the bus terminal close to the project area
	Limited or no access to certain areas of the site during construction
	Occupational safety and health risk to workers on the construction site as well as vendors in the market, the bus drivers and their customers, including sexual harassment and Gender Based Violence.
	Involuntary resettlement
	Conflicts arising between the various users (vendors and their customers as well as bus operators and commuters) of the complex and the contractors’ workforce.

Mitigation measures to address the impacts listed above are presented in table 5.

5.0 PURPOSE OF THE ESMP

The objective of the World Bank's environmental and social safeguard policies is to prevent and mitigate undue harm to people and their environment in the development process. The ESMP consists of the set of mitigation, monitoring and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social impacts, offset them or reduce them to acceptable levels. The Plan also includes the actions needed to implement these measures.

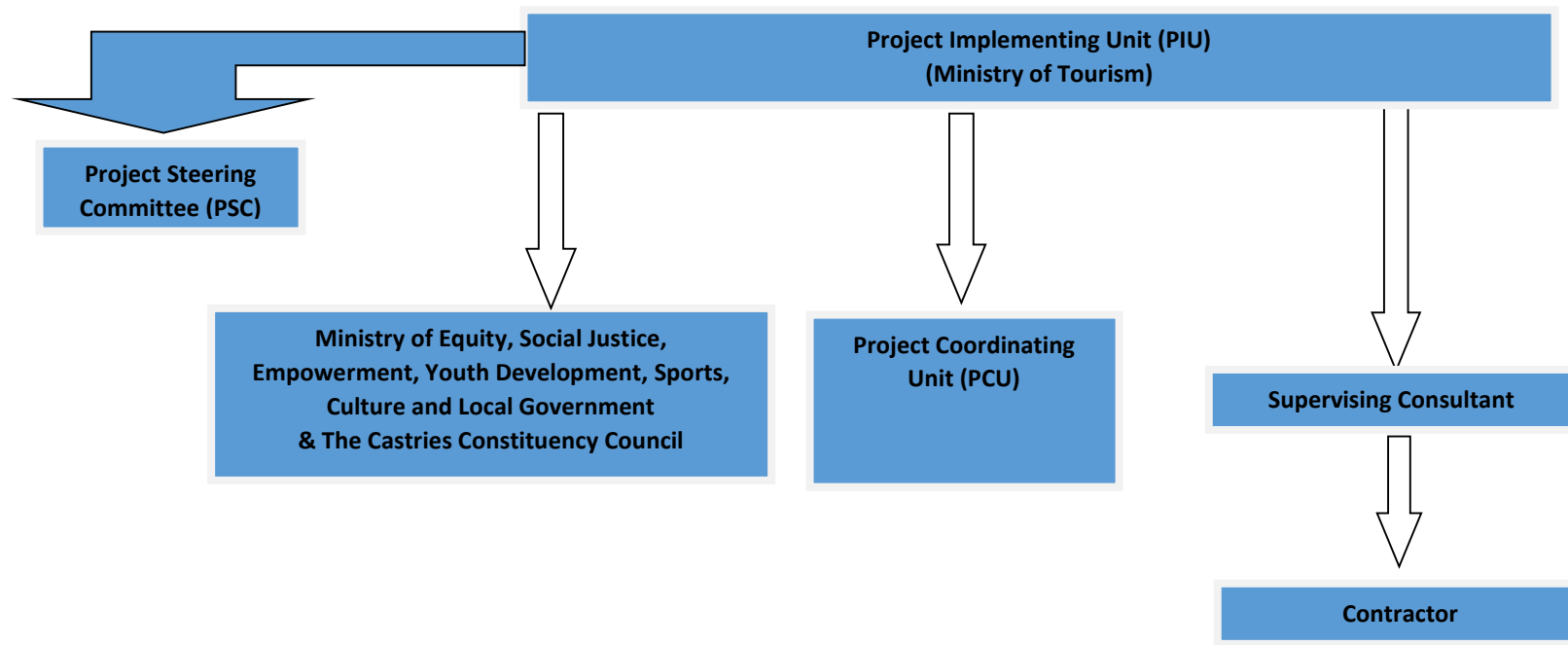
Efficient implementation of the recommended mitigation measures is necessary to avoid, minimise or offset adverse impacts and to promote beneficial impacts, resulting in an enhancement of the overall environmental performance of this activity. Effective environmental and social management can only be achieved if it is carried out within a formalised framework based on some fundamental general principles. These include:

- Environmental and social management should be fully integrated within the overall project management framework, directed towards achieving an environmentally sustainable project which meets its intended purpose, functions efficiently throughout its life, and results in minimal adverse environmental impact.
- Environmental and social management should not be considered as separate from other activities relating to preparation, implementation and subsequent operation of the project.
- Individual management/monitoring responsibilities and functions need to be clearly defined to ensure that there are no gaps which might prejudice environmental performance of the project.
- Procedures relating to environmental and social management should be formulated to cause minimum disruption to, and fully integrate with, other aspects of project management. The usual management structure, reporting systems and meetings should be used for environmental and social management.
- Successful environmental and social management requires a strong commitment at all levels of project management, and in all bodies concerned, if it is to achieve worthwhile results. Effective and timely liaison between the various relevant bodies is also vital.
- Environmental and social monitoring is a basic tool to provide information for decision-making by project management. It should be organised in a manner that facilitates the early recognition of potential problems, so that appropriate remedial action can be initiated before serious environmental damage, danger or inconvenience have been caused.

6.0 ORGANISATIONAL ASPECTS

The implementation of this ESMP requires involvement of several stakeholders each with different roles and responsibilities to ensure sound environmental and social management during implementation as shown in Figure 1.

Figure 1. INSTITUTIONAL ARRANGEMENT FOR E & S MANAGEMENT



6.1 Roles and Responsibilities

Ministry of Tourism (MoT) / Project Implementation Unit (PIU)

- Responsible for managing the environmental and social risks and impacts.
- Engagement with project-affected peoples and other stakeholders, monitoring and ex-post evaluations.
- Implementation of day-to-day project activities.
- Oversight of supervising consultant.
- Monitoring and supervision of project activities.
- Liaising with project stakeholders.
- Publicising the Grievance Redress Mechanism.
- Grievance Redress Management.
- Systematically document evidence of its activities and outcomes and provide information to the World Bank team as needed.

Project Coordinating Unit (PCU)

- Coordination of the Fiduciary Aspects of Project Implementation.

Project Steering Committee (PSC)

- Coordination of the Project Communication Strategy.
- Networking across the stakeholder groups.
- Monitoring and Evaluation of the overall project.
- Aligned Departments and Agencies will monitor based on their mandate and the day-to-day responsibilities of their respective institutions.

Ministry of Equity and Local Government (including the CCC which falls under this Ministry)

- To provide guidance and support in the implementation of the Abbreviated Resettlement Action Plan (ARAP).

The Contractor

- Responsible for implementing measures to address all the social and environmental safeguard requirements.
- Responsible for developing site specific plans as needed such as Traffic management plan, workers codes of conduct.
- Responsible for developing COVID-19 protocols for workers and site management.
- Comply with national regulations such as Waste Management Act of 2004, the Litter Act of 1983 and its amendments (1985 and 1993), and the Public Health Act of 1975.
- Hiring professionals with the appropriate project management and other specialist skills required for the successful implementation of these requirements. These include the Site Supervisor, Occupational Health and Safety Officer and the Environmental Monitoring Officer.
- Developing a Grievance Redress Mechanism for workers and addressing project grievances.
- Having a Code of Conduct that all workers follow. It will include E&S measures that the workers are expected to follow and socially acceptable behaviour.

6.2 The ORTCP and Line Agencies

The ORTCP PIU will have responsibility for all social and environmental safeguards management. Other agencies, Ministries and Departments (e.g. CCC), Environmental Health Department (EHD), Department of Infrastructure (DOI), Physical Planning Department (PPD), Labour Department, Public Utilities Department) will have responsibility for monitoring based on their mandate and the day-to-day responsibilities of their respective institutions. As such, environmental management and monitoring of this project by the public sector will involve several bodies, each with its own statutory responsibilities or other traditional roles, and organisational structure. These bodies should work cooperatively, within a coordinated framework, if efficient and effective environmental management from the public sector perspective is to be achieved. The ORTCP PSC also has project implementation oversight. Although all of

the following agencies are not represented, their participation should be co-opted as required to ensure improved coordination of public responsibilities in relation to environmental and social management and monitoring on this project:

1. Department of Infrastructure
2. Ministry of Agriculture
3. Transport Board
4. Police – Traffic Department
5. Labour Department
6. Environmental Health Department
7. Fire Service
8. Water and Sewerage Company (WASCO)
9. St. Lucia Electricity Company (LUCELEC)
10. FLOW C&W Communications Plc.
11. Castries Constituency Council (CCC)
12. The Department of Fisheries (DOF)
13. St. Lucia National Trust
14. The St. Lucia Craft and Dry Goods Vendors' Association
15. National Emergency Organisation (NEMO)

The Client (MOT) must make relevant line agencies and its own staff aware of the requirements for their monitoring of the construction upon commencement (as outlined in this ESMP), and the responsibilities will be agreed at the pre-design stage. The Ministry will take a lead role in construction monitoring on behalf of the public sector. It is assumed that the public sector agencies listed above will rely heavily on the MOT to monitor on a day-to-day basis, and call them in as needed, in light of the resource constraints that most of these agencies suffer. The ORTCP team comprises well-qualified persons with environmental and social expertise, and they will be required to routinely visit the sites, to identify potential issues, and interface with the supervision consultant's environmental specialist as well as their public sector counterparts, to ensure that environmental and social issues are adequately mitigated.

7.0 PROJECT PHASES AND ENVIRONMENTAL AND SOCIAL MANAGEMENT

7.1 Pre-Construction Phase

For the purposes of environmental management, the pre-construction phase is considered to extend from the initial stages of project preparation to ORTCP approval of final designs and bid documents. Environmental and social management activities during this phase include ensuring that:

- All government procedures relating to environmental and social matters, and in terms with the safeguards policies, have been (or will be) complied, prior to commencement of construction;
- Detailed designs incorporate appropriate, specific features aimed at minimising adverse impacts and enhancing beneficial impacts;
- Bid documents for contractors contain appropriate clauses to require the effective and efficient control of environmental impacts arising from construction activities;
- Work on the project communications plan is substantially completed. It is assumed that ORTCP will lead the development using in-house resources, and informed by recommendations emanating from this work. The ORTCP's grievance redress strategy will incorporate requirements related to these works;
- Project GRM is available and operational; and
- Consultations are conducted with relevant stakeholders.

The design recommendations for improved environmental performance will be incorporated into the project plans at the full design stage. The bid documents should include the following:

1. This ESMP

2. Environmental and Social Best practice to be applied by contractors with general requirements for site specific plans such as for construction management, traffic management, emergency response
3. Occupational Safety and Health Plan

7.2 Construction Phase Environmental and Social Management Activities and Responsibilities

For environmental and social management and monitoring, the construction phase is considered to extend from the pre-bidding activities to completion of the construction works.

Environmental and social management during the construction phase will cover three principal aspects:

- Final review of environmental and social aspects of designs and bid documents to ensure that they form a sound and comprehensive basis for addressing construction and operational environmental impacts;
- Ensuring that contractors are properly briefed in relation to the importance of environmental and social protection during construction; and
- Managing environmental and social aspects of construction implementation in such a way that adverse impacts associated with the construction process are satisfactorily mitigated and reduced to an acceptable level.

Briefings of interested bidders in the bid period should include the background and context of the approach to environmental and social management which will be taken during the construction phase, and should draw attention to the following:

- Contractual clauses intended to control adverse impacts, in line with meeting the environmental and social policies of the Government and the ORTCP.
- Requirements for environmental submissions as part of the bid.
- Construction supervision will include monitoring of, and reporting on, environmental aspects, on a daily basis.
- Environmentally-friendly construction involves little more than the adoption of good construction practices.
- A summary of key environmental and social adverse impacts and the contractual obligations which will be imposed on contractors in order to minimise occurrence and severity of construction impacts.
- Emphasis on the need for pricing of bids to take into account, compliance with environmental and social requirements set out in the bid documents, so as to facilitate compliance.
- The Abbreviated Resettlement Action Plan (ARAP) providing details on the likely impacts on project affected persons resulting from the Redevelopment of the Castries Market-Construction of a Box Park.

The environmental, social and other guidance provided in the bid document, is expected to help inform the bidders in the development of the following, to be included in the bid submissions:

- Method Statement including construction ESMP. The Contractor's construction ESMP shall provide details such as Contractor's commitment to environmental protection; methodology of implementing the project ESMP; environmental mitigation measures and monitoring program during different stages of the construction period, and the contractor's proposed resources for the implementation of the ESMP.
- Construction Programme
- Environment, Social, Health and Safety Policy statement
- Covid-19 management protocols at site
- Workers Code of Conduct
- Health and Safety Plan
- Traffic Management Plan

It is recommended that these submissions should be reviewed by the relevant authorities such as: the Departments of Environment Health, Transport, Physical Planning and Labour, and their comments factored into the bid review and award process. The approved plans that form part of the contract with the successful bidder, and any subsequent approved amendments to these, should be disseminated to all relevant line agencies so that they may be referred to for monitoring purposes. The plans must be

approved by the PIU, based on consultation and technical advice other departments as needed, before works commence.

Project management during construction, including general oversight and direction, will be the combined responsibility of the Contractor's Project Manager and the supervision consultants and the ORTCP team. Overall primary responsibility for day-to-day construction activities and contract management, and therefore for environmental management during construction, will lie with the Contractor's site supervisory staff.

7.3 Operations Phase Environmental and Social Management Activities and Responsibilities

This phase commences when construction is finalized, at which point the CCC is expected to assume responsibility for management of the facility. The CCC should enlist the support of relevant agencies such as the Department of Infrastructure in developing a maintenance plan to address operations phase requirements from inception, to guide the CCC inspection and maintenance protocols. Responsibility for routine cleaning will continue with CCC upon completion of construction.

The CCC will also be responsible for landscaping including the maintenance of new vegetation in the long term. Requirements for management will be most onerous early in the operational phase, as vegetation planted will still be establishing and maturing. Once the vegetation establishes, the attention required will significantly decline, and will be limited to nominal maintenance, which the CCC should have sufficient capacity to manage.

8.0 ENVIRONMENTAL AND SOCIAL MONITORING AND REPORTING

Environmental and social monitoring can help determine if construction works are having an impact on the environment, and on people. This can help assess the effectiveness of mitigation measures and provide early warning of pollution, impacts on livelihoods, and other incidents so that corrective action can be taken. Monitoring is an essential tool in relation to environmental and social management as it provides the basis for rational management decisions regarding impact control. The monitoring programme for this project will be undertaken to check on whether mitigation and benefit enhancement measures have actually been adopted and are proving effective in practice; to provide a means whereby any unforeseen impacts can be identified; and to provide a basis for formulating appropriate additional impact control measures if these appear to be necessary.

There are two basic forms of environmental and social monitoring:

1. **Compliance monitoring**- which checks whether prescribed actions have been carried out, usually by means of inspection and/or enquiries; and
2. **Effects monitoring**- which records the consequences of activities on one or more environmental or social components, and usually involves physical measurement of selected parameters or the execution of surveys, to establish the nature and extent of induced changes.

Compliance monitoring is usually given more emphasis in building construction projects because the majority of impact controls take the form of environmental protection measures incorporated in the design and contract documents, and the extent to which these are complied with by the contractor(s) plays a major part in determining the overall environmental performance of the project. Compliance monitoring affords the opportunity for a rapid response to construction impacts. There will be no effects monitoring recommended for this project.

8.1 Day-to-Day Monitoring and Reporting

Day-to-day environmental monitoring will be undertaken by a suitably qualified member of the Supervising Consultant's staff specifically assigned as Environmental Compliance Monitoring Officer to

undertake systematic observation of all site activities. This person may have other responsibilities, as long as s/he is able to properly meet the environmental and social monitoring requirements.

Monitoring will, for the most part, take the form of visual observations.

Site inspections will place an emphasis on early identification of any environmental problems and the initiation of suitable remedial action through communications to contractors. Where remedial actions have been required, further checks will need to be made to ensure that these are actually being implemented to the agreed schedule and in the required form. As experience of the principal problem areas is gained, attention will be concentrated on activities which are known to be the most troublesome.

The Supervising Consultant's Environmental Compliance Monitoring Officer will report to his/her Project Manager on a daily basis, using conventional report forms whose coverage will be extended to include key environmental matters, (*see Appendix 4 for A Safeguards Quarterly Report Template which can be utilized*). The Project Manager will decide on the appropriate course of action to be taken in cases where unsatisfactory reports are received from the Environmental Compliance Monitoring Officer regarding environmental matters. In the case of relatively minor matters, verbal interaction with the Contractor on the need for remedial action may suffice. In all serious cases the Project Manager has the responsibility to order a stop to any aspect of the works in the event where serious environmental damage or public nuisance/safety hazard is either imminent or has already been caused.

Bi- Weekly reports prepared by the Project Manager will summarize the results of the daily site monitoring, remedial actions which have been initiated, and whether or not the resultant action is having the desired result. The reports will also identify any unforeseen environmental problems and will recommend suitable additional actions.

8.2 Monitoring by ORTCP and Line Agencies

The Client represented by the ORTCP Project Engineer will inspect the works periodically to ensure that the contractor is in compliance with approved documents. Collaborating agencies may also carry out monitoring and investigation of matters arising from complaints by the public, in connection with implementation of any of the project components, which fall under its jurisdiction.

All relevant agencies including utility companies and emergency response agencies should be given adequate notice of the intended date of commencement of construction so that they can make the necessary arrangements for commencement of their monitoring.

The PSC should co-opt representatives of key line agencies when required to ensure effective monitoring.

8.3 Progress Meetings and Monthly Reports

Fortnightly meetings should be convened with the PIU, the Supervising Consultant and Contractor in attendance. The Environmental Compliance Monitoring Officer should also be in attendance. The fortnightly progress meetings shall include an agenda item which specifically covers environmental and social matters. Since environmental and social matters will probably, under normal circumstances, form a relatively small part of the overall business to be discussed at such meetings, it is also recommended that environmental and social matters should be the first item on the meeting agenda.

Environmental and Social issues will be specifically addressed and reported against in Fortnightly Progress Meetings and Reports. The report will include a section on environmental and social monitoring, which should be circulated by the Client agency to key line agencies.

9.0 COSTS ASSOCIATED WITH ENVIRONMENTAL MANAGEMENT ACTION PLAN IMPLEMENTATION

Costs to the contractors in complying with environmental protection clauses in the contract, including approved environmental plans, will be incorporated in unit rates and bill items, and will thus be included

in the bid prices. Generally, compliance with environmental protection clauses requires the contractors to behave in a responsible manner in relation to the environment, in accordance with good international construction practice. Environmental management and monitoring carried out should be an integral part of construction supervision duties and will be covered by the construction supervision budget.

Marginal costs to the contractors in complying with environmental protection clauses in the contract, including approved environmental plans, will be incorporated in unit rates and bill items, and will thus be included in the bid prices. Generally, compliance with environmental protection clauses merely requires the contractors to behave in a responsible manner in relation to the environment, in accordance with good international construction practice.

Table 2. identifies specific actions that should be stipulated in the BOQ to support environmental management in compliance with EMP recommendations.

Table 2 ESMP Implementation Costs incurred by Contractors

ESMP Activity incurring cost	Estimated cost (US\$)
Signage for vehicular and pedestrian traffic management (8 signs @ EC\$ 1,200)	3, 595.00
Traffic safety provisions (barriers, cones, lighting, etc.)	6, 000.00
Public announcements and communications with stakeholders	3,000.00
Total	12, 595.00

As part of the scope of services of the Supervision team, they are required to Review, implement and supervise the Environmental and Social Management Plan (ESMP) including Health and Safety requirements to ensure compliance, so as to mitigate environmental and social impacts. As part of the Supervision of works the Structural Engineer shall also function as the Environmental Supervisor with responsibilities for overseeing the implementation of the Environmental Plan.

10.0 PROJECT MITIGATION PLANS

The following are detailed in tables 4 and 5 for the potential impacts identified during construction:

- Project action or activity possibly resulting in impacts.
- Environmental and social impacts.
- Mitigation measures recommended. This often refers the reader to one or more separate documents containing best practice recommendations. These are Environmental and Social *Best Practices to be applied by Contractors* and *Occupational Health and Safety (OHS) Guidance*. In some instances, mention is made of the *Traffic Management Plan which should be developed*.
- Responsibility for mitigation measures identified, and the recommended timing and frequency of such measures.

In Tables 4 and 5 mitigation measures are provided for the design and construction phases respectively.

10.1 Design Phase Mitigation

The Mitigation measures for the design phase impacts are provided in Table 4 below

Table 4 - Design Phase Environmental and Social Management

Project Action or Activity	Environmental/ Social Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
1.New designs could affect the aesthetics of the area	<ul style="list-style-type: none"> Introduction of a taller building may obstruct the view from existing buildings and streets. 	<ol style="list-style-type: none"> Engage relevant stakeholders in early consultation, for guidance and promote the use of the GRM Present draft designs to relevant stakeholders for their review and feedback before finalisation. Facilitate easy access to up-to-date design information, and feedback mechanisms. 	<p>Designer, for engaging stakeholders through the design period as required. ORTCP and CCC for facilitating engagements and feedback from stakeholders. CCC, and ORTCP for being responsive in provision of requisite information on design and soliciting feedback from relevant stakeholders. ORTCP for facilitating stakeholder engagement and communicating with the design team.</p>
2. Plans for landscaping, greening of the site and water features	<ul style="list-style-type: none"> Competition for scarce water resources for landscape irrigation. 	<ol style="list-style-type: none"> The landscaping should be designed to minimise irrigation requirements, and should only be irrigated where and when necessary. Drought-resistant native or other well adapted non-invasive plants should be used where possible in the landscaping design. If possible, the design should maximise capture of rain water and storm runoff, with the intention to meet irrigation water requirements from these sources under normal conditions. 	<p>Designer for ensuring that the designs incorporate features that would maximise the use of rainwater harvesting. CCC, and Department of Infrastructure, Department of Forestry For being responsive in provision of requisite information and feedback.</p>

10.2 Construction Phase Mitigation

The potential direct and indirect, on-site and off-site environmental impacts associated with the project are presented in table 5 below, and includes:

- (a) Anticipated impacts during construction; and
- (b) Recommendations to mitigate these impacts and enhancement measures, where applicable

Table 5. Construction Phase Environmental and Social Management

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
<p>1. Activities generating waste such as site clearance and earthworks during the construction of the Box Park, particularly the foundation.</p>	<p>1.1 If waste is improperly managed, it will create</p> <ul style="list-style-type: none"> • A health and safety hazard, caused by dust and sedimentation, to stakeholders who continue to use adjacent spaces. Increases in the silt load of drains resulting in impairment of drainage system function and adverse effects on marine life, and water quality because the site is in close proximity to the Castries Waterfront. • Mud on roadways affecting traffic safety and inconveniencing users as the John Compton Highway and other minor roads run directly across from the site. Additionally, a number of bus stops operate in very close proximity to the site. • Land and water pollution, public health hazards, landscape 	<p>1. The contractor should take all reasonable steps to minimize the quantum of waste material generated through careful planning of the works.</p> <ul style="list-style-type: none"> - If contractor is hauling site-generated waste, legal requirements for proper containment of the waste will be observed, and disposal will be at an approved location. (A copy of the St. Lucia Solid Waste Management Authority Guidelines for the Submission of Waste Management Plans for Development is found in Appendix III) - Spoil will be kept separate from other construction waste and reused on site with appropriate sediment control. - Spoil generation will be minimised as Contractor will balance any cut and fill within the site. <p>2. Solid waste will not be permitted to enter drainage systems and roadways thus the requirements for provision of adequate non-polluting worksite sanitary facilities including provision of a sufficient number of adequate waste receptacles across the site (including appropriate and accessible containment for worker food waste) and regular collection services provided by a licensed collector.</p>	<p>Designers, for works design and specifications, and identification of possible spoil reuse sites within the worksite (<i>design phase</i>)</p> <p>Owners of proposed disposal sites, for approval of site use and guidance on intended after use (<i>prior to bidding</i>)</p> <p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · identification of potential spoil disposal sites and acquiring permits as needed · implementation of recommendations (<i>throughout construction</i>) <p>ORTCP, for approval of appropriate spoil disposal sites proposed by Contractor, after consultation with Environmental Health and Solid Waste Management Authority</p> <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>continuous through construction</i>)</p> <p>Environmental Health and Solid Waste Management Authority, for monitoring in accordance with their mandate (<i>intermittently</i>)</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
	<p>degradation and reduction in amenity value, arising from inappropriate/ inadequate solid waste disposal practices.</p> <p>Quantities of waste generated are not expected to be large enough to significantly compromise landfill life, but efforts should be made to minimize the quantum of waste disposed at the landfill.</p>	<p>3. Ponding of water that may encourage mosquito breeding will be avoided.</p>	<p><i>through construction, and in investigation of complaints referred to them by ORTCP).</i> CCC, for timely removal of items that may be redeployed in other locations.</p>
<p>2. Activities generating noise, vibration, smoke and dust, such as:</p> <p>(I) equipment and vehicle operation in site preparation, fill placement, materials /waste /equipment haulage, etc.,</p> <p>(ii) wind forces on exposed surfaces and aggregate /spoil heaps.</p> <p>(iii) burning on site IS NOT PERMITTED</p>	<p>2.1 Noise and dust affecting:</p> <ul style="list-style-type: none"> · Adjacent properties in particular sensitive receptors, such as the government offices, businesses and residencies nearby. · Road and side walk users (pedestrian and vehicular) workers, and vendors in the Castries Market and bus drivers on the various bus stands. 	<ol style="list-style-type: none"> 1. The contractor to use best practices for the mitigation of noise and dust risk. 2. Utilize PPE and include in the <i>Occupational Health and Safety (OHS) Plan</i> 3. To minimize the effects on institutions and other nearby businesses restrict use of specified equipment and tools based on noise levels. 4. There will be no burning of waste on site. All waste will be disposed at the SLSWMA landfill site at Deglos. 5. Effective measures will be taken to minimise nuisance when working close to the nearby roadway or the sea, including use of methods which minimise dust generation and a restriction on working hours. 6. Limit high vibration-causing activities to standard construction hours where possible. Any construction work proposed to take place outside of standard construction hours will be subject to a case-by-case approval process. 7. Implement measures to minimise noise and vibration transference where necessary, for example using squawkers for reversing vehicles, noise barriers, noise and vibration monitoring (if guideline targets may be exceeded). 8. Avoid use of vibratory rollers near sensitive areas. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costings (<i>bid preparation</i>) · implementation of Recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).</p> <p>Department of Infrastructure, Labour Department and Environmental Health for monitoring in accordance with their legislation (<i>intermittently through construction, and in investigation of complaints referred to them by ORTCP</i>).</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		9. Complete property pre-condition surveys before construction begins, where properties may be affected by vibration-causing activities.	
<p>3. Activities causing water pollution, such as:</p> <p>(i) leakage of fuels and oils from equipment</p> <p>(ii) accidental spills of fuels, oils, cement products or other chemicals.</p> <p>(iii) Improper site wastewater and solid waste management.</p> <p>(iv) Inadequate Sewerage disposal practices</p> <p>The site is across the road from the Castries Harbour but water runoff from the site may eventually drain into the harbour during heavy rains.</p>	<p>3.1 Water pollution, resulting in:</p> <ul style="list-style-type: none"> · Health impacts on persons who may come into contact with the water. -Land and water pollution and public health hazards arising from inappropriate/inadequate liquid waste disposal practices and spillages/ leakages of contaminating materials at the worksite. 	<ol style="list-style-type: none"> 1. The contractor will use best practices and take all necessary precautions for protection of the environment; and mitigation of land and water pollution. 2. Contractor should be responsible at his own cost for taking immediate remedial action and payment of compensation for any environmental damage resulting from his actions. 3. Contractor should minimise and carefully control use of chemicals. 5. Contractor should advise of type and quantity of chemicals to be stored on site for construction purposes. 6. Temporary storage location of permissible quantities will be approved by the relevant authorities, and appropriate precautions taken. These include: <ul style="list-style-type: none"> -Construction of a dedicated chemical storage structure to be roofed with a lockable door. -The floor to be equipped with a continuous curb to retain spilled materials. -Chemicals not to be stored near burning material or hot work (welding, grinding) or in shop areas. -Adequate space and shelving to be provided to properly segregate chemicals. -Dry materials to always be placed above liquids, never vice versa. -Liquids not to be stored above eye level. - Storage for PPE to be provided where it is easily accessible in the event of emergency, but not in the chemical storage area. -Appropriate emergency wash area to be provided. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costings (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>throughout construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>Continuous throughout construction</i>).</p> <p>CCC, Environmental Health, and Fisheries, for monitoring in accordance with their legislation (<i>intermittently through construction, and in investigation of complaints referred to them by ORTCP</i>).</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		<p>-Information of chemical locations, contents, appropriate emergency response and other details to be readily accessible to site management, in the event of spill or injury.</p> <p>-Procedures in the handling of chemicals or other hazardous material and in event of emergency to be clearly posted on the container.</p> <p>7. Contractor should install secondary containment for fuel stored on site.</p> <p>8. Contractor should adopt pollution prevention measures relating to fuel and oil storage/dispensing arrangements, to prohibit other than emergency maintenance of equipment and vehicles on the site, and require usage of spillage trays during on-site refuelling of minor equipment.</p> <p>9. Waste oils arising from emergency servicing of construction equipment will be disposed of at a licensed recycling facility.</p> <p>10. If required washing of vehicles, plant and tools to be carried out at designated areas within the work site which are provided with oil/grease traps.</p> <p>11. Contractor should abide by Public Health Act of 1975 and Regulations, in the provision of sanitary facilities for workers on site.</p> <p>12. Sewage will not be permitted to enter the drainage systems.</p> <p>13. Contractor should prohibit the use of worksite pit latrines.</p> <p>14. Requirements for provision of adequate non-polluting worksite sanitary facilities include provision of sufficient number of adequate toilet facilities on the site, connected to suitable treatment, or otherwise collected and disposed of. Toilet facilities are available within the Castries Market Complex and the Contractor can make arrangements with the CCC for use of these facilities.</p>	

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		15. All workers to be required to use these facilities. Workers who refuse are to be subject to dismissal.	
4. Workforce Deployment	4.1 Creation of construction employment opportunities for local residents.	<ol style="list-style-type: none"> 1. The contractor should make maximum use of local labour. 2. The contractor should maximise use of labour-intensive construction methods rather than mechanisation. 3. The contractor should maximise participation of local suppliers of materials, services, equipment and sub-contractors. 	The contractor is responsible for employment, as well as the procurement of goods and services.
	4.2 Development of social friction between the contractor's workforce and the public.	<ol style="list-style-type: none"> 1. The contractor should assign responsibility for dealing with complaints from the general public to the site foreman, whose name and contact details should be shown on the project signboard. 2. A Grievance Redress Mechanism (GRM) will be established for the communities and workers which sets out the relevant dates, details of the complainant, the nature of the complaint, action taken, and other relevant details. 3. The contractor should take appropriate measures to ensure that the site is well secured in order to protect assets on site. 4. Contractor should develop and maintain a code of conduct for all personnel, including sub-contractors for site activities. 	The contractor
	4.3 Health and safety hazards to the workforce arising from participating in an inherently dangerous occupation.	<ol style="list-style-type: none"> 1. Contractor will have full regard for the safety of all persons entitled to be on the site and manage the site and works in an orderly manner appropriate to avoid danger. 2. The standards and guidelines regarding health and safety shall be the draft Labour Code. The Factories Regulations (Cap. 106 of 1948) and the Occupational Health and Safety (OHS) Guidance should be developed as part of this plan and implemented by the contractor. 	The contractor

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		<p>The OHS guidance will include guidance to prevent the transmission of COVID-19 throughout the workforce.</p> <p>3. The contractor should designate a qualified senior member of his site staff as Health and Safety Officer with the responsibility to ensure that all workforce health and safety matters are properly and fully addressed.</p> <p>4. The contractor should provide personal protective equipment such as protective helmets safety boots, protective clothing, ear mufflers, dust masks, gloves etc. suitable for the activities being undertaken by the workforce, and makes it a condition of employment that these are worn when needed. The contractor should provide personal protective equipment to prevent the spread of Covid 19 and should ensure that employees use the equipment.</p> <p>5. The contractor should convene regular health and safety meetings with the workforce to reinforce safe work practices and expectations.</p> <p>6. The contractor will provide lights, guards, fencing etc. for protection of the works and for the safety and convenience of the public or others where necessary.</p> <p>7. The contractor should procure the requisite insurances.</p> <p>8. Accidents will be promptly reported to the Labour Department and requisite procedures followed. Near misses will be recorded by the Health and Safety Officer.</p>	
	4.4 Environmental damage caused by the workforce.	1. Contractor should take all reasonable steps to protect the environment on and off-site, and to avoid	The Contractor

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		<p>damage or nuisance to persons or property arising from pollution, noise or other issues arising as a consequence of his methods of operation, including the following:</p> <ul style="list-style-type: none"> - Train workers in environmental issues and measures to be taken. - Designate an officer to supervise and ensure compliance with environmental obligations. - incorporate environmental and other issues into the agenda of regular meetings with workers. - order immediate suspension or halt any activity which is causing, or is likely to cause significant environmental damage, and to commit to make good any such damage at his own expense, in accordance with the instructions of the relevant authorities. - Require the immediate and permanent dismissal from site of any member of the workforce who is committing or has committed acts prejudicial to the environment, including theft or interference with property and offensive behaviour. - Provide and enforce worker use of appropriate, accessible solid waste disposal facilities. 	
<p>5. Excavations resulting in chance finds of physical cultural resources (PCR) and destruction or loss of physical cultural resources.</p>	<p>5.1 Damage to archaeological sites and protected areas.</p> <p>5.2 Damage to cultural heritage.</p>	<p>1. Contractor should not damage archaeological sites, protected areas and cultural heritage. If any damage is done works should stop immediately and the supervision team should be informed.</p> <p>2. Follow guidance in the Chance Find Procedures (CFP).</p>	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costings (<i>bid preparation</i>) · implementation of Recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>continuous through construction</i>).</p> <p>ORTCP for monitoring and referring to relevant agencies.</p> <p>Line agencies (National Trust, A & H Society, National Archives) for monitoring in accordance</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
			with their legislation or mandate (<i>intermittently through construction, and in investigation and management of chance finds referred to them by ORTCP</i>).
<p>6. Traffic delays and road closures, from:</p> <p>(i) Works adjacent to the roadway that encroach on one or both lanes.</p> <p>(ii) Inappropriate contractor activity beyond the work site.</p>	<p>6.1 Traffic delays and road closures, impacting:</p> <ul style="list-style-type: none"> · All road users (vehicular and pedestrian) originating from or traversing through the area · Businesses and other sensitive receptors operating in the area 	<p>1. Develop traffic management plan based on the Environmental & Social Best Practices Guidance</p> <p>2. Full road closures and inordinate delays may be avoided if the following approach is used:</p> <ul style="list-style-type: none"> a. Ensure that operators and occupiers of premises immediately adjacent to the proposed worksite are informed of the proposed timing of the works, and of provisions to be put in place to facilitate access to their premises, so they may plan deliveries and other activities accordingly; b. Ensure proper traffic controls are in place in accordance with best practice and the <i>traffic management plan</i> (signage, personnel, and barriers). c. Ensure that worksites are properly signed and cordoned off to facilitate safe passage of vehicles at all times, including during periods that the site is inactive; d. Ensure that emergency responders are kept abreast of the location of works and implications for traffic. e. collaborate with the public in a public awareness campaign, including timely Public Service Announcements (this will be part of the broader project communications plan); f. if a road closure is unavoidable, plan this outside of peak traffic times; 	<p>Designer, for:</p> <ul style="list-style-type: none"> · identifying options for discussion with Relevant parties. <p>ORTCP, for:</p> <ul style="list-style-type: none"> · support in implementation of public awareness campaign (<i>in advance of implementation in affected area</i>). <p>Contractor, for: incorporation of Recommendations into work plan and costings (<i>bid preparation</i>) implementation of recommendations and approved Management Plans (<i>through construction</i>)</p> <p>Supervisor, for: monitoring compliance of Contractor during implementation (<i>continuous through construction</i>)</p> <p>Consultant monitoring compliance of Contractor during implementation (<i>continuous through construction</i>)</p>
<p>7. OSH concerns in all work activities, including:</p> <p>(i) Operation of heavy equipment.</p> <p>(ii) Working in proximity to operating equipment.</p>	<p>7.1 OSH impacts, resulting in worker illness, lost work time, disability, chronic health issues, or death.</p>	<p>1. Ensure utility companies and Fire Service are informed of works schedule, and conduct necessary inspections in advance of works, to properly identify the location of their infrastructure, and to monitor and supervise activities in proximity to assets of concern.</p>	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>throughout construction</i>)

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
<p>(iii) Working in proximity to road traffic adjacent to the worksite.</p> <p>(iv) Working in proximity to overhead and buried infrastructure.</p> <p>(v) Exposure to noise and dust.</p> <p>(vi) Exposure to Covid19 when working in groups.</p>		<p>2. Comply with the Occupational Health and Safety (OHS) Guidance</p> <p>3. Also refer to Environmental & Social Best Practices Guidance in Appendix 5</p> <p>4. The contractor will accept full responsibility for the adequacy, stability and safety of all operations and methods of construction, as well as have full regard for the safety of all persons entitled to be on the site and keep the site and works in an orderly state appropriate to avoidance of dangers.</p> <p>5. Construction will be carried out such as not to promote instability during construction</p> <p>6. All works will be carried out in accordance with the approved plans.</p>	<p>Ensuring that Covid 19 protocols are followed.</p> <p>Supervisor, for monitoring compliance of Contractor during implementation <i>(Throughout construction).</i></p> <p>Labour Department, Environmental Health and Department of Infrastructure for routine inspections, handling of complaints referred to them by ORTCP, general public or workers.</p>
<p>8. Public Health and Safety concerns, through:</p> <p>(i) Noise, dust and equipment emissions from nearby works.</p> <p>(ii) Vehicular and pedestrian traffic adjacent to the works</p> <p>(iii) Harassment and discrimination of workforce and the public</p>	<p>8.1Public Health and Safety concerns, through:</p> <ul style="list-style-type: none"> · reduced air quality in the vicinity of the works, affecting road users and users of adjacent properties · reduced safety of passage near the works for pedestrians and vehicles · The Contractor and Supervisor treating employees differently because of gender, ability or ethnicity. · Contractor employees engaged in harassment of the public, sexual and otherwise. · Harassment among the contractor's personnel. 	<p>1. Apply the approved Traffic Management Plan.</p> <p>2. Follow the Environmental & Social Best Practices Guidance for general safety and convenience of the public; and Emergency procedures to be instituted.</p> <p>3. See also, recommendations in this Table for noise and dust.</p> <p>(4) The GRM should be promoted among the contractor's employees and the general public, specifically the vendors at the market, the bus drivers at the terminal and the residents.</p> <p>(5) Dissemination and Enforcement of the Code of Conduct.</p> <p>(6) Sensitizing the workforce on the Code of Conduct.</p>	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costings <i>(bid preparation)</i> · implementation of recommendations and approved Management Plans <i>(continuous through construction)</i> <p>Supervisor, for monitoring compliance of Contractor during implementation <i>(Continuous through construction).</i></p> <p>Department of Infrastructure, CCC and Environmental Health for routine inspections, handing of complaints referred to them by ORTCP.</p> <p>The contractor and supervisor for ensuring adherence to the Code of Conduct, promoting the GRM among the employees, and ensuring adherence to the St. Lucia Labour Code</p> <p>ORTCP for promoting the GRM to the public and referring complaints to the Department of Labour as well as the Department of Gender Relations.</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
<p>9. Landscape, terrestrial, aquatic and marine ecologies affected by all work activities, in particular:</p> <p>(i) Equipment operation.</p> <p>(ii). Storage and use of cement and other chemicals on site.</p> <p>(iii) Stockpiling of materials (inputs and waste) within the worksite</p>	<p>9.1 Damage to landscape, cultural heritage, And the coastal waters by:</p> <ul style="list-style-type: none"> · sedimentation from the works area spoil, and aggregate stockpiles; · Pollution of the coastal waters from leaking equipment or accidental spills. <p>Chance finds of physical cultural resources are highly unlikely and not considered to be a high-risk during these works</p>	<ol style="list-style-type: none"> 1. Follow Environmental & Social Best Practices Guidance 2.General requirements for protection of the environment 3.Mitigation measures during earthworks 4. Mitigation of noise and dust risks 5. Mitigation of pollution from solid, liquid waste and hazardous materials/wastes 6. Chance find procedure operationalized. 7. There must be no unnecessary clearing of natural vegetation. 8. Avoid the use of chemicals. 9. All recognized natural habitats, particularly the Castries Harbour, in the immediate vicinity of the activity must not be damaged or exploited. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of Recommendations into work plan and costings (<i>bid preparation</i>) implementation of recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).</p> <p>CCC, Department of Infrastructure, For monitoring in accordance with their legislation (<i>intermittently through construction and investigation of complaints referred to them by ORTCP</i>).</p>
<p>10. General Construction Operations</p>	<p>10.1 Improper storage of construction materials and parking of plant and vehicles, which may create a hazard for the users of the project area, particularly the minibus operators, vendors, residents and the users of services in the area.</p>	<ol style="list-style-type: none"> 1. No parking or stockpiling of materials will be allowed along the accessways or in areas that would impede the movement of the users of the area. 2. No materials shall be stored so that they encroach on, or in any way adversely affect the operations of users of the project area. <p>The contractor should plan for the temporary storage of construction materials and wastes, and the parking of construction plant within the worksite only. This will be part of the Site Management Plan.</p>	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>continuous through construction</i>).</p>
	<p>10.2 Impedance of access to/from lands adjacent to the worksite.</p>	<ol style="list-style-type: none"> 1. All operations will be carried out so as not to interfere unnecessarily or improperly with the convenience of the public, or access to and use and occupation of public or private roads, footpaths and properties. 2. Neighbouring users will be informed in advance of any activity that has the potential to impede access to their properties or other public spaces. 3. Identifying and preparing for the use of alternative access routes by users of the project site. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>continuous through construction</i>).</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
	10.3 Interference with traffic due to disposal of demolition and construction wastes, and other wastes.	<ol style="list-style-type: none"> 1. Contractor should abide by all solid waste regulations in the disposal of demolition waste. 2. Public roads will be kept free and clear of wastes. 3. Contractor should erect appropriate signage in the vicinity of the site to warn other road users of construction traffic. 4. Contractor should consult Transport Board and the Traffic Department of the Royal St. Lucia Police Force early for approval and advice if there is likely to be any traffic disruption. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).</p>
	10.4 Increased road safety hazards and inconvenience to road users and the general public caused by the construction traffic/works interfering with normal traffic flow.	<ol style="list-style-type: none"> 1. Contractor should at all times take care to protect the public and facilitate the uninterrupted flow of traffic during his operation and use of public roads. 2. Contractor should erect appropriate (approved) signage on either side of the junction with the highway to alert other road users to the possibility of slow construction traffic/heavy equipment crossing lanes etc. 3. Construction vehicles will be licensed in accordance with Transport Board stipulations. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).</p>
	10.5 Damage to existing road pavements and structures caused by overloaded haulage traffic.	<ol style="list-style-type: none"> 1. Contractor should adopt every reasonable means to prevent damage to roads or bridges communicating with, or en route to the site, by his or his subcontractors' traffic. 2. Contractor should be responsible for the cost of reinstatement of pavement or structures which have been damaged by his or his subcontractors' haulage traffic. 3. All haulage will be carried out using vehicles of types and capacities appropriate to task and to require compliance with gross vehicle weight restrictions imposed by vehicle licensing authorities and all laws and regulations pertaining to vehicle use on public roads. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		<p>3. Contractor should consider location in his selection of suppliers, to minimise haul distances to site.</p> <p>5. Contractor should ensure that all tailgates and drop sides are properly secured, there is no overloading of loose materials above truck sides, and all loads are properly secured.</p> <p>6. Contractor should comply with speed restrictions imposed by the relevant authorities.</p> <p>7. All haulage will be carried out using vehicles of types and capacities appropriate to task, in compliance with gross vehicle weight restrictions imposed by vehicle licensing authorities and all laws and regulations pertaining to vehicle use on public roads.</p> <p>8. Particular care will be taken to ensure that concrete mix trucks and fuel tankers are loaded and driven in a manner which does not result in spillage.</p> <p>9. Contractor should be responsible, at his own cost, for cleaning up spillages or shed loads without undue delay.</p> <p>10. Contractor should minimize quantities of mud tracked onto the public roadways, and conduct haulage preferably during dry periods.</p> <p>11. Public roads which have material deposited on them as a result of the contractor's activities will be cleaned and kept free of mud, soil and other materials.</p>	
	<p>10.6 Competition for scarce potable water resources with existing users.</p>	<p>1. Contractor should conserve water.</p> <p>2. Contractor should have water storage for construction purposes.</p>	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
	10.7 Damage to and interference with public and privately owned services.	1. Contractor should identify and locate existing services on the site boundaries, and will take all reasonable precautions to protect services during construction and will repair and reinstate forthwith any damage arising from the works, at his expense, in consultation with/under the supervision of, the relevant authorities.	Contractor , for: · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) Supervisor , for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).
	10.8 Creation of dust nuisance from construction activities on- and off- site	1. Contractor should take all reasonable steps to protect the environment on- and off-site, and to avoid damage or nuisance to persons or property arising from pollution, noise or other causes arising as a consequence of his methods of operation. 2. Contractor should take appropriate measures to minimise dust generation including regular watering of works sections, aggregate, and soil stockpiles where dust is likely to cause nuisance. 3. All material to be stockpiled within the worksite will be kept clean and free of mud, soil and other materials. 4. Access roads will be regularly swept. 5. Contractor should minimise quantum of mud and dust tracked onto public roadways from the site. 6. Selection of aggregate sources will minimize haul distances to site, and disruption to other road users. 7. All construction waste taken off site and aggregate brought onto the site will be covered by a tarpaulin to minimize dust emissions. 8. Contractor should not stockpile material along the public roadway.	Contractor , for: · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) Supervisor , for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).
	10.10 Creation of noise nuisance and air pollution caused by haulage vehicles/	1. Contractor should take all reasonable steps to protect the environment on- and off-site, and to avoid damage or nuisance to persons or property arising	Contractor , for: · incorporation of recommendations into work plan and costing (<i>bid</i>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
	construction plant and machinery operation.	<p>from pollution, noise or other causes arising as a consequence of his methods of operation.</p> <p>2. Operations will be carefully designed, including selection of haulage routes within the site and location of stockpiles.</p> <p>3. All vehicles will be maintained in accordance with manufacturer's specifications and any vehicles/ plant /machinery which emit undue smoke or noise to be immediately removed from site for repair or maintenance.</p> <p>4. Noise specifications for construction equipment will be stipulated in accordance with Labour Department standards for the occupational environment.</p> <p>5. Internal combustion engines will be fitted with silencers.</p> <p>6. Records of complaints will be kept.</p>	<p><i>preparation</i>)</p> <ul style="list-style-type: none"> · implementation of recommendations and approved Management Plans <i>(through construction)</i> <p>Supervisor, for monitoring compliance of Contractor during implementation <i>(Continuous through construction)</i>.</p>
	10.11 Increase in emissions of ozone-depleting substances (ODS)	1. Contractor should select alternative materials and/or technologies to minimise the use of ODS within the property.	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing <i>(bid preparation)</i> · implementation of recommendations and approved Management Plans <i>(through construction)</i> <p>Supervisor, for monitoring compliance of Contractor during implementation <i>(Continuous through construction)</i>.</p>
	10.12 Land sterilisation/ reduction in post-construction land use options, adverse roadside or landscape visual impact and public health and safety hazards, arising from inadequate worksite clearance on completion of construction.	<p>1. Contractor should clear away and remove from the site all equipment, surplus material, rubbish and temporary works, and shall leave the site in a clean and workmanlike condition.</p> <p>2. Lands beyond the boundaries of the worksite will not be used by the contractor for any purpose, unless he has the pre-approval of the relevant statutory</p>	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing <i>(bid preparation)</i> · implementation of recommendations and approved Management Plans <i>(through construction)</i> <p>Supervisor, for monitoring compliance of Contractor during implementation</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		authorities. Any such site shall also be properly cleared and remediated upon works completion.	<i>(Continuous through construction).</i>
	10.13 Economic displacement and resettlement	<ol style="list-style-type: none"> 1. Formulation and implementation of an Abbreviated Resettlement Action Plan, including the Grievance Redress Mechanism (GRM) 2. Compensation for economic displacement/resettlement to be paid prior to the start of any project activities that will cause the displacement. 	<p>ORTCP for formulation and implementation of the ARAP and GRM</p> <p>CCC and Ministry of Equity for assistance in the implementation of the ARAP and grievance redress. Ensure payments are made prior to start of project activities resulting in the economic displacement/ resettlement.</p> <p>GoSL for the payment of compensation.</p> <p>Contractor and supervisor for accepting grievances and forwarding to ORTCP</p>
11. Building construction on land.	11. Dramatic alteration of views/diminished aesthetics of the site from the air, and the roadway.	<ol style="list-style-type: none"> 1. A Site Management Plan should be developed and implemented by the Contractor. 2. Hoarding will be erected to conceal construction activity from persons in close proximity to the site. 3. All electrical and telecommunications cables will be underground. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).</p>
12. Concrete works	12.1 Dust and other air pollution arising from the operation of concrete plant.	<ol style="list-style-type: none"> 1. The amount of concrete to be mixed on site will be minimised. Concrete requirements will be met by use of pre-mixed concrete. 2. Concrete mixed on site will be done within specially constructed mixing bays designed to contain fugitive emissions. 3. All moveable plant will be fitted with effective dust suppression equipment and operated and maintained in accordance with the manufacturer's manuals. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).</p>
	12.2 Pollution of water bodies and fish kills, resulting from entry of cement dust, fresh concrete and mixer wash in water.	<ol style="list-style-type: none"> 1. The amount of concrete to be mixed on site will be minimised. Concrete requirements will be met by pre-mixed concrete. 2. A concrete mixing bay will be constructed to minimize concrete losses. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>)

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		<p>3. Particular care will be taken when construction activities are carried out in or in the vicinity of drainage systems and over water bodies to ensure that pollution does not occur.</p> <p>4. Concrete will not be poured in exposed areas during rains.</p> <p>5. Although quantities of concrete mixed on site are anticipated to be small as premix will be preferentially used, special precautions will be taken to ensure that materials such as cement dust, fresh concrete and lime do not pollute water bodies.</p> <p>6. Washing of ready-mix equipment or dumping of excess concrete on site will be prohibited.</p>	<p>Supervisor, for monitoring compliance of Contractor during implementation <i>(Continuous through construction)</i>.</p>

10.3 Natural Disaster Mitigation and Environmental and Social Management

Although Climate Change has propelled the unpredictability of natural disasters, the official Caribbean hurricane season runs from 1st June through to 30th November annually. Thus, this time of year requires all to be alert and prepared for natural disasters, especially hurricanes. Depending on the severity of the disaster, losses may amount to millions of dollars of damage to property and people, including construction sites and crew. To mitigate such impacts, construction workers must understand the risks and how to avoid them, in order to be prepared when a disaster strike. Additionally, the city of Castries is prone to flooding which has become a key concern. Therefore, the following Natural Disaster Environmental and Social Management Plan is designed to serve a guide for managing and mitigating impacts related to natural disasters.

The natural disaster mitigation and environmental and social management plan should work in tandem with other plans including the Covid-19 health and safety guidelines.

Table 6 – Natural Disaster Environmental and Social Management Plan

Natural Disaster	Environmental Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
1. Hurricane	<ol style="list-style-type: none"> 1. The risk of upended equipment from winds. 2. The risks of flooding from storm surge. This can cause flooding. In construction areas, toxic chemicals, like paint, gasoline and cleaning agents, are common, and flooding transport them to other areas. 	<ol style="list-style-type: none"> 1. Construction sites should never be occupied during a hurricane. The risk of injury to crew members is too high, so when a hurricane is approaching, work needs to shut down, and workers should be sent home. 2. Move long-term material storage away from areas prone to flooding. Material in flood areas will be damaged, and chemicals will leach into flood waters and hurt the surrounding communities. Store material above ground level if possible and away from high flood zones. 3. Create two teams, the Hurricane Response Team and the Hurricane Recovery Team. The Response Team will know how to prepare for the hurricane event, while the Recovery Team will be trained on how to deal with the aftermath of a storm. 	<p>The Contractor- assistance can be sought from NEMO as well as the DOI.</p>

	<p>3. Increased risk of flooding from extreme rainfall.</p>	<p>4. Have a list of supplies and materials. Should something be damaged or go missing after a hurricane, having a list of the major material on site will help with identifying missing inventory.</p> <p>5. Reduce the amount of accumulated debris and scrap metal on site. These can exacerbate flooding and can also easily become windblown hazards in a hurricane, so eliminating them before the storm will help protect the job site and the surrounding community. Scrap that cannot be eliminated should be tied down and stored more securely or placed in a sealed dumpster.</p> <p>6. Empty dumpsters before the storm hits. When a storm is approaching, empty all dumpsters. If they cannot be emptied in time, have them covered with nets to prevent the contents from turning into hazards.</p> <p>7. Anchor or remove barricades and loose buildings like portable toilets. Barricades are easily picked up by the winds of a hurricane. Non-essential barricades should simply be removed during the storm. Essential ones should be properly anchored to reduce this risk.</p> <p>8. Protect other large equipment from the storm. Top off fuel tanks, anchor lighter pieces of equipment and protect valuable equipment from flying debris.</p> <p>9. Secure building framework. Banding, concrete fill, and heavy structural steel components can help keep building frameworks in place during a hurricane. When this isn't possible, remove the frameworks to prevent damage.</p> <p>10. Protect the site from flooding, sandbags, and other similar products can help prevent some of the flooding associated with hurricanes.</p> <p>11. Have a relocation plan for equipment. Large equipment like excavators can be damaged in a hurricane if your site is in the storm's path, so whenever possible, relocate costly equipment to higher or protected ground.</p> <p>12. Have a system in place to notify the on-site crew when it is safe to return. Make sure the team knows when they should report back to work. Have a</p>	
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		<p>safety inspection crew ready to see the site, and a system in place to contact crew members so they can return to work only when it is safe to do so.</p> <p>13. Establish an off-site place to meet. There may be a need to meet to discuss restoration after a hurricane. Establish an off-site place where the Hurricane Recovery Team can meet to discuss what needs to happen next.</p> <p>14. Use caution when assessing damage because of potential post-storm hazards. A construction site will have numerous hazards after a hurricane including toxic water, jagged debris, and unstable buildings. After getting the all-clear to return to the site to assess damage, crews must use extreme caution.</p> <p>15. Have a plan for water removal. Water removal is one of the first and most important things to tackle after a hurricane. Water can not only damage the materials on the site, but it can also soften the ground, which hurts the structural stability of the project. Water needs to be emptied onto a street that has a stormwater system or pumped into tanker trucks to be hauled off-site safely.</p> <p>16. Initiate salvage activities quickly. Sort out the damaged and undamaged materials, cover all equipment that has become exposed due to the storm, check for leaking gas lines, check for downed power lines, and ensure fire protection systems are restored to the property as quickly as possible to avoid additional damage and expense.</p>	
2. Earthquakes	<ol style="list-style-type: none"> 1. Ground displacement can cause uneven surfaces. Be aware of this when entering the construction site and preparing for repairs after an earthquake. 2. Fire is a serious risk. Broken power and gas lines leave the site vulnerable to fire. 3. Flooding is possible near waterways. Broken dams or levees can allow flooding in normally safe areas. 	<ol style="list-style-type: none"> 1. Have a safe place designated on the construction site for earthquakes. The safe places normally chosen, like under a table or desk or against an interior wall, will not work on a construction site. Aim to be away from the building, which could collapse, and away from any large equipment. Remember that most accidents after an earthquake happen within 10 feet of the building, including construction site buildings. However, try not to move too far from your current position, as the farther someone moves during an earthquake event, the greater the chance of injuries. 2. Practice earthquake smart construction techniques. Technology has improved significantly in recent years, resulting in structures that are much more likely to be earthquake resistant. By implementing these strategies early in the construction project, you can limit the amount of damage to the site and the risk of injury to construction crews. 	The Contractor- assistance can be sought from NEMO as well as the DOI.

	<p>4. Buildings can topple in an earthquake. This includes buildings that are not yet complete, and some construction projects will be at higher risk because their earthquake protection measures may not be completed.</p>	<p>3. Practice “Drop, Cover, and Hold On”. Drop, cover, and hold on is an earthquake safety measure that anyone can practice, regardless of where they are when an earthquake hits. It refers to dropping to hands and knees, covering your head and neck with one arm and crawling to the closest shelter, then holding on to something steady until the shaking stops. Finding shelter is the challenge during an earthquake on a construction site, but even a large piece of equipment or a tree can serve as a shelter when needed. It is recommended to practice this technique at the start of construction.</p> <p>4. Hold earthquake drills to ensure that construction crew members know the proper response during an earthquake- This is a key preparation step because, in the chaos of the moment during an earthquake, people may experience moments of panic. Preparing ahead of time, can help prevent injury during an earthquake.</p> <p>5. Watch for fires- Broken gas lines, even near construction sites, and damaged electrical components or electrical lines can cause fires. Also, the motion of the earthquake itself can release sparks, leading to a fire.</p> <p>6. Keep an earthquake emergency supply kit on hand to protect those on the site.</p> <p>6. If operating equipment when an earthquake hits, stop and exit the vehicle as soon as safely possible- It is difficult to control equipment and vehicles during an earthquake, and they can be deadly.</p> <p>7. Know that after the shaking stops, there is always a possibility of aftershocks. For that reason, do not return to the site or work until you are confident all risk has passed.</p> <p>8. If there is a clear path away from the construction site, exit as quickly as possible after the shaking has stopped. A construction site is not somewhere to be during aftershocks, so encourage the entire work crew to get away quickly for their safety.</p>	
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Floods	<ol style="list-style-type: none"> 1. Pollution- Floods will wash chemicals and sewage into the water. The contaminated water will spread quickly over an area causing public health issues and killing fish. 2. Loss of life- Floods can cause death and injury. Workers can get trapped in buildings by the quick rising waters. 3. Property- As flood waters rise, they can flow into low-lying properties. The water will deposit huge amounts of debris and silt that will destroy floors, walls and any electrical gear. 	<ol style="list-style-type: none"> 1. Identify any risks based on the site location. If the site is near water, ascertain whether there is natural drainage, if not identify if there is a way to add drainage. Use flood maps to assess this risk, then take measures to ensure the area can properly drain when needed. 2. Understand the impact of sediment runoff. Often in construction, the contour of the land is important to the construction project. When sediment runoff occurs, defining property boundaries can become difficult. Also, the grading that has occurred to make the building project possible will be damaged. 3. Have a plan to protect equipment and personnel if the site floods. Creating a site flooding plan if the site is at risk for a flood will save lives and money. 4. Assess the materials that will be damaged by flood waters. Steel construction material may be fine if it gets wet. Plasterboard or composite wood will be damaged. If a flood is coming, elevate those materials that need to be kept dry. If a flood occurs without warning, dispose of damaged material before moving on with the project. 	The Contractor- assistance can be sought from NEMO as well as the DOI.

		<p>5. Build portable barriers to prevent flood damage. Gates or flood walls and even sandbags can all help reduce the risk of financial damage and loss from flooding at a construction site.</p> <p>6. Store electrical and mechanical equipment above projected flood heights. If there is a flood warning, make sure electrical and mechanical equipment is stored above the flood water's expected level.</p> <p>7. Understand the risk of contamination from chemicals. Flood water can be contaminated with chemicals that are stored on a construction site, and this puts the surrounding community at risk.</p> <p>8. If a flash flood warning is issued, evacuate the area. Flash floods can kill in an instant, so take these warnings seriously. Even construction equipment is not safe from flash floods.</p> <p>9. Flood water is not safe, hence, never wade in flood water on a construction site, because of the high risk of contamination, and the accumulation of debris which can cause injury. Wait until the water recedes or have it drained properly before entering the construction site to assess the damage.</p>	
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10.4 COVID-19 Guidelines for Operations

Measures to address COVID-19 may be presented in different ways (as a contingency plan, as an extension of the existing project emergency and preparedness plan or as standalone procedures). The Contractor must convene regular meetings with the project health and safety specialists and medical staff (and where appropriate the local health authorities), and to take their advice in designing and implementing the agreed measures.

Where possible, a senior person should be identified as a focal point to deal with COVID-19 issues. This can be a work supervisor or a health and safety specialist. This person can be responsible for coordinating preparation of the site and making sure that the measures taken are communicated to the workers, those entering the site and the local community. It is also advisable to designate at least one back-up person, in case the focal point becomes ill; that person should be aware of the arrangements that are in place.

On sites where there are a number of contractors and therefore (in effect) different work forces there should be emphasis on the importance of coordination and communication between the different parties. Where necessary, the PIU should request the main contractor to put in place a protocol for regular meetings of the different contractors, requiring each to appoint a designated staff member (with back up) to attend such meetings. If meetings cannot be held in person, they should be conducted using whatever IT is available. The effectiveness of mitigation measures will depend on the weakest implementation, and therefore it is important that all contractors and sub-contractors understand the risks and the procedure to be followed.

The Contractor should seek the assistance of the PIU, either directly or through the Supervising Engineer, in identifying appropriate mitigation measures, particularly where these will involve interface with local services, in particular health and emergency services. This is encouraged as in many cases, the PIU can play a valuable role in connecting project representatives with local Government agencies, and helping coordinate a strategic response, which takes into account the availability of resources. To be most effective, projects should consult and coordinate with relevant Government agencies and other projects in the vicinity.

Workers should be encouraged to use the existing project grievance mechanism to report concerns relating to COVID-19, preparations being made by the project to address COVID-19 related issues, how procedures are being implemented, and concerns about the health of their co-workers and other staff.

WHAT SHOULD THE CONTRACTOR COVER?

The Contractor should identify measures to address the COVID-19 situation. What will be possible will depend on the context of the project: the location, existing project resources, availability of supplies, capacity of local emergency/health services, the extent to which the virus already exist in the area. A systematic approach to planning, recognizing the challenges associated with rapidly changing circumstances, will help the project put in place the best measures possible to address the situation.

PIUs and contractors should refer to guidance issued by relevant authorities, both national (see National Guidelines below) and international (e.g. WHO), which is regularly updated. Addressing COVID-19 at a project site goes beyond occupational health and safety, and is a broader project issue which will require the involvement of different members of a project management team. In many cases, the most effective approach will be to establish procedures to address the issues, and then to ensure that these procedures are implemented systematically. Where appropriate given the project context, a designated team should be established to address COVID-19 issues, including PIU representatives, the Supervising Engineer, management (e.g., the project manager) of the contractor and sub-contractors, security, and medical and OHS professionals.

Procedures should be clear and straightforward, improved as necessary, and supervised and monitored by the COVID-19 focal point(s).

Procedures should be documented, distributed to all contractors, and discussed at regular meetings to facilitate adaptive management.

See *Appendix VII* for specific National and International measures and guidelines for mitigating COVID-19 infection on the worksite.

10.5 Operations Phase Mitigation

Impacts in the operations phase are generally similar to those for construction but are much less in scale. The CCC is expected to develop a Maintenance Programme, with assistance from relevant government agencies and departments such as the Department of Infrastructure, for routine maintenance of the works. All costs should be integrated into CCC's recurrent costs for maintenance.

Key impacts and mitigation measures are:

- **Waste Management:**
Waste can be generated due to the vending activities which take place on the site as well as the anticipated increased in visitor activity in the Box Park, and this will be managed by the CCC with support from the St. Lucia Solid Waste Management Authority (SLSWMA).
- **Air and noise Pollution:**
Air and noise pollution can occur if the building is used for mass crowd activities and these will be managed by the CCC and the organiser of the activity following guidelines outlined in approvals from the Police and Fire Departments, and National Emergency Management Organisation.

In addition, it is important to maintain the area including the surrounding landscaping. The CCC should budget adequately for maintenance of the site. General public awareness should be carried out about the need to protect and preserve the area.

11. TRAINING AND ENVIRONMENTAL AND SOCIAL AWARENESS

The Contractor should ensure that all concerned employees are aware of the relevant environmental and social requirements as stipulated in local environmental legislation and the Contract specifications. The Contractor is responsible for providing appropriate training to all staff. This should be tailored to suit their level of responsibility for environmental and social matters. The Contractor should also ensure that all site staff members are aware of the emergency response procedures. All staff should receive environmental induction training and managerial staff should receive additional training. Training should also include overview of the conditions contained in the Code of Conduct.

Additional refresher training may be provided, and this should be scheduled following periodic internal review of requirements for the Project activity. Records should be maintained for staff environmental and social training. Records should be kept on site where possible for each project activity for easy access during site audits or enquiries. Environmental and social training records (e.g. attendance records for environmental awareness training, topics covered) should be kept.

12. THE ABBREVIATED RESETTLEMENT ACTION PLAN

For each activity under the Project that may involve resettlement, the World Bank requires a satisfactory resettlement plan that is consistent with the provision of the policy framework be submitted to the bank for approval, before the project is accepted for Bank financing. When the number of persons affected by the component exceeds 200, a resettlement plan shall be prepared. Where impacts on the entire affected population are minor, or fewer than 200 people are affected, an abbreviated resettlement plan may be agreed with the borrower. Impacts are considered minor if the affected people are not physically displaced and less than 10% of their productive assets are lost.

An Abbreviated Resettlement Action Plan (ARAP) will be prepared and will provide details on the likely impacts resulting from the Construction of the Box Park. The ARAP will contain the following elements:

- Estimated population displacement, and a summary of livelihood activities;
- Description of compensation and other resettlement assistance to be provided
- A record of consultations with displaced people about acceptable alternatives;
- A plan for additional consultations and participation, grievance redress mechanisms, and public information before and during project activity;
- Institutional arrangements for implementation and procedures for grievance redress;
- Arrangements for monitoring and implementation; and

- Timetable and budget

Table 6 below, shows categories of potential project affected persons with estimations based on the population that may be displaced.

Table 6 - Estimations based on population that may be displaced

Sub-Project: Construction of the Box Park		
Permanent Land acquisition	No	
Temporary land acquisition	No	
Temporary Loss of livelihoods	Possibly	
Permanent loss of livelihoods	No	
Loss of assets	No	
Resettlement (What needs to be moved?)	8 coconut vendors who operate on the site. 9 vendors in fixed huts on Jn. Baptiste Street.	The physical structures to be moved, include vending carts. Relocating the huts on Jn. Baptiste Street will provide the greatest challenge. Though most huts are full wooden structures, at least one (1) has concrete flooring.
Asset Compensation (What is to be compensated?)	Currently Uncertain	

13. GRIEVANCE REDRESS MECHANISM

Individuals and groups who may consider themselves deprived of appropriate treatment under the project will utilize the established grievance redress mechanism. The process includes: (i) a recording and reporting system, including grievances filed both verbally and in writing, (*A template of a Grievance log is in Appendix 2*) (ii) designating staff with responsibility for addressing grievances at various levels of Government, and (iii) a time frame to address the filed grievances. The functioning of the grievance redress mechanism will be monitored and evaluated by the Social Safeguards Officer of the PCU during its implementation.

The following questions will help to assess whether the GRM is functioning up to its full potential. If the answer to any of these questions is **No**, the team will consider improving it.

- Does the project have clear, formal, and transparent internal mechanism (e.g.) a grievance redress unit, grievance redress committees, designated grievance redress officers) and rules for addressing grievances?
- Do project officials responsible for grievance redress have the authority to take or demand remedial action?
- Are officials responsible for grievance redress obliged to take action on all grievances?
- Do project-affected people feel that they can lodge grievances without fear of retaliation?
- Are project beneficiaries aware of their right to file a grievance and of the grievance redress process in general?

- Are there internal processes in place to record, track, and monitor the grievances and the action taken on them?
- Does the GRM provide timely feedback (written or otherwise) to the petitioner on actions taken?
- Is there an appeal process in place that GRM users can access if they are not satisfied with how their grievance has been resolved?

During the life cycle of the project, all grievances pertaining to the project would be managed by the Social Safeguards Officer of the PCU. The SE identifies the problem area, then in collaboration with other support staff or/ and consultant, addresses the grievance as follows:

- All grievances received under the project, either by mail, fax, e-mail, will be invariably routed to the Social Specialist for processing. A copy of the complaint should be given to the aggrieved indicating receipt of the grievance.
- Grievances received by word of mouth should be recorded, re-read to the aggrieved person and signed by the aggrieved person in the presence of a witness and forwarded to the SE.
- The SE shall assess and discuss the gravity of the matter and decide whether it shall be dealt with immediately or should be forwarded directly to the Attorney General for independent attention.

Processing Grievances

After the final demarcation of the project sites, notification to the public about the pre project development will be provided. Notification should be given on radio via (or other pertinent media) about the project development, including at project site, with information as to where to direct all grievances. All grievances relating to the development of this project are to be directed to the PCU. The grievance notes should be signed and dated by the aggrieved person.

The Project Coordinator or the Social Safeguards Officer, of the PCU should acknowledge within five (5) business days, the receipt of the documentation. The nature of the grievance would be directly addressed by the SE along with the other relevant concerned government officials. The relevant personnel would ascertain the period (not exceeding thirty (30) business days) necessary to address the grievance and notification must be given to the aggrieved person.

- No grievance is to be rejected without having been independently examined, issued a reason and a reply.
- Complainants must be informed of the name, designation, office, and telephone number of the official who is processing the case. The time frame in which a final reply will be sent should also be indicated.
- All grievances concerning non-fulfilment of contracts, levels of compensation, or seizure of assets without compensation shall be made in writing, and addressed to the Permanent Secretary, Department of Economic Development. Copies of the complaint shall be sent to the PS and the PSC for tabling within five business days following communication to the PCU.
- If an agreement cannot be reached the aggrieved party or parties shall raise their concerns to the PCU, who shall refer the matter to the Attorney General within ten (10) business days. Should grievances remain unresolved at this level, they can be referred to the Court of Law.

The steps undertaken should a grievance arise are as follows:

Grievance Redress Procedures

Grievances from affected parties	<p>Grievances made verbally to the Social Safeguards Officer in person at stakeholder engagement meetings or to the Contractor’s personnel.</p> <p>By email to the following address- ortcpslu@govt.lc</p> <p>By letter, addressed to the: Project Manager ORTCP Ministry of Tourism, Information & Broadcasting, Culture & Creative Industries Sir Stanislaus Building The Waterfront CASTRIES</p>
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	By phone at number 468 5816 / 468 4610 Or call, text or WhatsApp to 721 9678,
Access Point	<ul style="list-style-type: none"> • The PCU serves as the access point for grievances
Grievance Log	<ul style="list-style-type: none"> • Grievances received verbally are documented, verified and signed by both parties. • Grievances will be copied to the relevant authority
Assessment	<ul style="list-style-type: none"> • Grievances categorized by type. Determination of eligibility of grievance. • The first assessment of the grievance is conducted by the PCU and technical officers from the pertinent GOV authorities. • Letters acknowledging the grievance is issued by the PCU • The Social Transformation Officer (STO) for the region provides assistance with dealing with conflict resolution and grievance. The STO will communicate all disputes and grievances to the PCU immediately when received. Should a dispute arise, the applicable Laws of Saint Lucia will prevail.
Resolution and Follow-up	<ul style="list-style-type: none"> • Development of an Implementation Plan for resolution of grievances including timeframes in which each step is completed as stated above in in the section on processing grievances.

Communicating a Grievance

(i) Who can submit a Grievance?

A Grievance can be registered by any individual or group of individuals who believes it has been or will be harmed by the Project. If a Grievance is to be lodged by a different individual or organization on behalf of those said to be affected, the Claimant must identify the individual and/or people on behalf of who the Grievance is submitted and provide written confirmation by the individual and/or people represented that they are giving the Claimant the authority to present the Grievance on their behalf.

(ii) How is the Grievance Communicated?

The GRM maintains a flexible approach with respect to receiving Grievances, thus a Grievance can be transmitted to the GRM by any of the following means:

By email to the following address- ortcpslu@govt.lc

By letter, addressed to the: Project Manager

ORTCP
Ministry of Tourism, Information & Broadcasting, Culture & Creative Industries
Sir Stanislaus Building
The Waterfront
CASTRIES

By phone at number 468 5816 / 468 4610 or call, text or WhatsApp to 721 9678, in person at stakeholder engagement meetings or to the Contractor's personnel.

(iii) What information should be included in a Grievance?

The Grievance should include the following information:

- (a) The name of the individual or individuals making the Complaint (the "Claimant");
- (b) A means for contacting the Claimant (email, phone, address, other);
- (c) If the submission is on behalf of those alleging a potential or actual harm, the identity of those on whose behalf the Grievance is made, and written confirmation by those represented of the Claimant's authority to lodge the Grievance on their behalf;
- (d) The description of the potential or actual harm;

(e) Claimant's statement of the risk of harm or actual harm (description of the risk/harm and those affected, names of the individual(s) or institutions responsible for the risk/harm, the location(s) and date(s) of harmful activity);

(f) Whether the Claimant wishes that their identity is kept confidential.

The World Bank Grievance Redress Service

The complainant has the option of approaching the World Bank, if they find the established GRM cannot resolve the issue. **It must be noted that this GRS should ideally only be accessed once the project's grievance mechanism has first been utilized without an acceptable resolution although the complainant has the right to utilize this service at any time.** 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](http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5) which can be found at the following URL link: <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service#5>. Completed forms will be accepted by email, fax, letter, and by hand delivery to the GRS at the World Bank Headquarters in Washington or World Bank Country Offices.

Email: grievances@worldbank.org
Fax: +1-202-614-7313
By letter: **The World Bank**
Grievance Redress Service (GRS)
MSN MC 10-1018 NW,
Washington, DC 20433, USA

Addressing Gender-Based Violence

The GRM will specify an individual who will be responsible for dealing with any gender-based violence (GBV) issues, should they arise. A list of GBV service providers will be kept available by the project. The GRM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

If a GBV related incident occurs, it will be reported through the GRM, as appropriate and keeping the survivor information confidential. Specifically, the GRM will only record the following information related to the GBV complaint:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of their knowledge, the perpetrator was associated with the project; and,
- If possible, the age and sex of the survivor.

Any cases of GBV brought through the GRM will be documented, but remain closed/sealed to maintain the confidentiality of the survivor. Here, the GRM will primarily serve to:

- Refer complainants to the GBV Services Provider; and
- Record the resolution of the complaint

The GRM will also immediately notify both the Implementing Agency and the World Bank of any GBV complaints **WITH THE CONSENT OF THE SURVIVOR.**

Promoting GRM Awareness

The Grievance Redress Mechanism (GRM) will be promoted through a public sensitization campaign which will include stakeholder engagement meetings and communication with stakeholders via email, WhatsApp and bulletins or flyers. The general public will be informed through public announcements through various media including the Government Information Service and website, television and radio announcements. All communication will provide contact information for the Social Safeguards Officer, who is responsible for receiving complaints. The project signs will also provide relevant information about the implementing agency for persons who wish register grievances.

APPENDICES

Appendix I – GRM Form



OECS REGIONAL TOURISM COMPETITIVENESS PROJECT

REGISTRATION OF GRIEVANCE

Please use CAPITAL LETTERS

Name of Project Site: _____

The complainant prefers to not have his / her name registered

From:

Name: _____

Gender: Female Male

Contact No: _____

Address: _____

Preferred method of contact: Telephone call WhatsApp / Messenger Letter

Email (Please provide address) _____

As per the Resettlement Policy Framework of the OECS Tourism Competitiveness Project, Grievance Redressal, I register my grievance as detailed:

“Details of Grievance” (a) Outline reasons why and how you are affected by the project. (overleaf if necessary)

(b) If land or other properties are being affected e.g. (agriculture), include copies of relevant documentation to support your claim. List documents and attach copies

(a) _____

(b) _____

(c) _____

(d) _____

Undertaking: I hereby certify that statements made in my Grievance and documentation enclosed are true and complete to the best of my knowledge. If at any time any part of the Grievance or the documentation is found to be false, I will be liable for any legal action that the Government may deem necessary.

Date: _____ Time of Reporting: _____

dd/mm/yy

Medium used for reporting grievance: **In Person** **Telephone** **Email** **Letter**
WhatsApp / Messenger

(Signature of aggrieved person) _____

Name of recording Officer: _____ (Signature) _____

(Please print)

List all documentation enclosed: (continue overleaf)

Appendix II – Grievance Log Template



SAINT LUCIA SOLID WASTE MANAGEMENT AUTHORITY

GUIDELINES FOR THE SUBMISSION OF WASTE MANAGEMENT PLANS FOR DEVELOPMENTS

(Revised September 2013)

Purpose of the Guidelines

These guidelines are intended to:

- a) Promote a coherent, integrated approach whereby the management of construction and demolition waste, green waste and other waste generated in the process of the development is given due consideration throughout the life cycle of the project.
- b) Outline the manner in which clients, planners, designers, contractors, subcontractors and all others involved in the project can act co-operatively in order to reduce and manage all waste arising from the project.
- c) Provide designers, developers, practitioners and competent authorities with an agreed basis for determining the adequacy of waste management plans.

The following information shall be submitted to the office of the Saint Lucia Solid Waste Management Authority.

P.S. Developers are required to follow the numbering/lettering sequence when submitting the Waste Management Plan for Developments. To avoid delays in the approval process, all information requested must be provided. In the event that any information is not presently available, developers must provide a statement to undertake to provide the necessary information once it becomes available.

1.0 Introduction

- 1.1 Name of Proposed Project/Development.
- 1.2 Brief description of the Proposed Project/Development.

2.0 Pre-Construction Phase

- 2.1 Site Description
 - a) Indicate whether the site is vacant.
 - b) Indicate whether there are any buildings on the site.
 - c) Indicate what materials/items will be removed from the site.
 - d) Indicate the estimated volume of material/waste to be removed from the site.

- e) Indicate how the waste will be managed?
- f) Indicate whether any hazardous waste will be generated and state how it will be managed.

2.2 *Waste Description & Quantities*

- a) Indicate the nature (type) and volume of waste which will be generated daily.
- b) State how each type of waste will be managed.

2.3 *Waste Diversion*

- a) Indicate the volume and nature (type) of waste which will be diverted away from the landfill.
- b) Indicate where the waste will be diverted and for what purpose.
- c) If applicable, provide written proof from the property owner for approval for use.

2.4 *Waste Transportation*

- a) Indicate the name and contact details of the private contractor(s)/waste hauler(s) who will be engaged to transport the waste to the landfill site.
- b) Indicate the license plate number of the vehicle(s) which will be transporting the waste.

3.0 **Construction Phase**

3.1 *Waste Description & Quantities*

- a) Indicate the nature (type) and volume of waste which will be generated daily.
- b) Indicate how each waste type will be managed.

3.2 *Waste Storage*

Indicate the type of receptacle(s) to be provided for the storage of waste generated from the construction activity.

3.3 *Waste Transportation*

- a) Indicate the name & contact details of the private contractor(s)/waste hauler(s) who will be engaged in transporting the waste.

b) Indicate the license plate number(s) and the type of the vehicle(s) which will be transporting the waste.

3.4 *Waste Collection Frequency and Spill Control*

Indicate the frequency with which waste will be disposed by the private contractor/waste hauler and the precautionary measures to be taken during transportation to prevent spillage.

3.5 *Indicate the estimated length of time for completion of the construction.*

4.1 Operational Phase

4.1 Indicate the propose use(s) of the development upon completion.

4.2 Indicate the number, capacity and type of waste receptacles which will be provided on the premises and where they be placed for the storage of waste generated.

4.3 Indicate the frequency with which the waste will be disposed and at which landfill.

4.4 Indicate what measures will be taken in order to prevent access by vagrants and members of the public to the stored solid waste.

4.5 Indicate the manner in which the waste will be placed out on the road curb/sidewalk for collection and the frequency.

4.6 Indicate whether the building will be used for both residential and commercial purposes.

4.7 For commercial establishments, indicate who will be responsible for the disposal of the waste. In accordance with the Waste Management Act No. 8 of 2004, section 33 subsection 1, "Any person who conduct industrial, commercial or institutional operations must make their own arrangements for waste management and shall ensure that any waste generated does not present a risk to human health, safety or the environment".

Please note:

1. *That a statement must be provided stating that the developer and the principal contractor will take all necessary steps to ensure that the waste is managed in accordance with the Waste Management Plan approved by the Authority as well as the Waste Management Act of 2004.*

2. *That the Waste Management Plan must be completed and signed by the developer or his/her representative.*
3. *That the Waste Management Plan must be submitted with a copy of the following:*
 - a. *A Site Plan*
 - b. *A Location Plan*

Appendix IV – Safeguards Quarterly Report Template



MINISTRY OF TOURISM, INFORMATION & BROADCASTING, CULTURE & CREATIVE INDUSTRIES
OECS REGIONAL TOURISM COMPETITIVENESS PROJECT
IDA Credit #6000-LC
Environmental and Social Safeguards Quarterly Report
[February 11, 2021]

A. Summary

The Construction of a Box Park is part of the Castries Market Redevelopment Project. The major activities undertaken to this point are the screening exercise to identify PAPs and discussions held with the Project Design Team to discuss the scope of the project and to identify the footprint of the project. consultations have also been held and will continue throughout the project, with the Castries Constituency Council, which is spearheading the consultation process and relocation of PAPs. The Promotion of the GRM and the implementation of the ARAP are the significant activities which will be undertaken during the next reporting period.

B. Sub-projects and Program Activities

SUB-PROJECT Activity	STATUS	ADVANCES & CHALLENGES	NEXT STEPS
Preparation of the ARAP	A Screening exercise was held to identify Project Affected Persons (PAPS) and a screening report was prepared. The data gathered from this exercise was shared with the Castries Constituency Council (CCC).	<ul style="list-style-type: none"> - The CCC which manages the Market Complex is responsible for the relocation of the users of the area. This has started with the CCC meeting with individual vendors and writing formally to them to discuss possible relocation sites. 	<ul style="list-style-type: none"> - The CCC will continue to spearhead the consultation process for relocating the vendors. This process is expected to be completed by March 31 2021. - The ORTCP Social Safeguards Officer will liaise with the CCC

		- Progress of consultations hampered by COVID-19 restrictions on gatherings.	and provide oversight of the process and keep a record of all activities undertaken under the ARAP. - The ARAP should be
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C. Environmental Management Actions Items

The Environmental and Social Management Plan has been prepared and submitted to the World Bank for review.

D. Status of the Grievance Redress Mechanism

The GRM has been developed and presented in the ESMP for approval. A Communication Plan to assist with promoting the GRM has also been developed. However, the promotion of the GRM to stakeholder groups has been hampered by restrictions against gatherings due to Covid 19. Other methods of communication, other than group meetings such as WhatsApp, Facebook, radio and television announcements, as indicated in the communication plan, will be utilized to promote the GRM to PAPs and the general public, including other stakeholders such as the Minibus drivers, residents, The Transport Board and the Traffic Department of the Royal St. Lucia Police Force.

E. Context

Social distancing protocols as well as restrictions on gatherings of more than ten (10) persons which are in force because of the Covid-19 pandemic has hindered efforts to meet with the various stakeholders. Additionally, a number of users of the project area, for example, the minibus drivers have reduced the number of days that they work making the consultation process even more challenging.

During construction the contractor will be expected to follow national as well as International guidelines for the prevention of Covid-19 among employees. The contractor is expected to adhere to section 9.4 and Appendix VII of this ESMP.

F. Conclusions and Recommendations

The preparation and implementation of the ARAP and the promotion of the GRM are the significant activities to be undertaken in the upcoming reporting period.

G. Annexes

Appendix V – Occupational Health and Safety (OHS) Guidance

Appendix VI – Environmental and Social Best Practices

Appendix VII – Covid-19 National and International Health and Safety Guidelines

OCCUPATIONAL SAFETY AND HEALTH CHECKLIST FOR QUARRIES, CONCRETE & CONSTRUCTION SITES

The Labour Act Cap 16.04 of the Revised laws of Saint Lucia at Part IV (Occupational Safety and Health) provides clear guidelines and sets out the obligations of Employers, Employees, Contractors and the like to protect workers and themselves from hazards in the workplace. We have consulted with the Chief Medical Officer on the issues as relates to COVID -19 for this sector and provide the following guidelines which MUST be adhered to:

- 1) Provide workers with all the necessary personal protective equipment (PPE) needed to perform his/her duties.

This includes but is not limited to:

- Hard hats
 - Footwear
 - Gloves
 - Safety goggles
 - Coveralls
 - Dust mask or respirators based on the activities and the exposure. (respiratory protection is mandatory for all at the construction site)
2. Avoid close contact with other co-workers (6 feet distance).
 3. Train workers in the proper use of personal protective equipment.
 4. Ensure that employees use PPE at all times while performing duties. Employees shall not be allowed on the site without the necessary PPE.
 5. Ensure fall protection measures (nets, scaffold) are in place for work at heights. Where collective fall protection measures are not possible, persons working at heights shall be provided with the appropriate fall arrest/restraint equipment such as harnesses.
 6. Scaffolds **must** be erected and inspected by competent person(s) and the results recorded.
 7. All work equipment, plant and machinery are to be maintained in a safe condition and inspected regularly before use. All tools and machinery shall be properly guarded and protected.
 8. Appropriate first aid devices must be provided on site.
 9. Portable drinking water must be provided on site and easily accessible by all employees.
 10. Access to washroom and handwashing facilities or hand sanitizers.
 11. Workers with flu symptoms should be removed from the work site and must receive medical attention.
 12. Report all occupational accidents to the Department of Labour as stipulated in Section 246 of the Labour Act; that is within seventy-two (72) hours, however in the case of death, immediately.
 13. Ensure systems are in place for consultation with workers on safety, health and welfare matters.
 14. Encourage workers to report any safety and health concerns.
 15. Approval will be granted by the Labour Department upon submission and review of the relevant documentation, plans and previous inspections where applicable.
 16. Submit occupational safety and health plan/policy to the Department of Labour.

17. Pay particular attention to the provisions of the following Sections of the Act:
 - 256 - Duties of employers at construction sites
 - 257 - General Duties of employers
 - 260 - General Duties of employees
 - 261 - Duties of owners at construction sites
18. Adherence to all directives and guidelines from Chief Medical Officer.
19. The Department of Labour reserves the right to halt all activities at any site where there is a failure on the part of any party to comply with the stipulated guidelines.

COVID-19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS

The issues set out below expected good workplace management but are especially pertinent in preparing the project response to COVID-19.

- (a) **ASSESSING WORKFORCE CHARACTERISTICS:** Many construction sites will have a mix of workers e.g. workers from the local communities; workers from different parts of the country; and even workers from other countries. Workers will be employed under different terms and conditions and be accommodated in different ways. Assessing these different aspects of the workforce will help in identifying appropriate mitigation measures:
 - The Contractor should prepare a detailed profile of the project work force, key work activities, schedule for carrying out such activities, different durations of contract and rotations (e.g. 4 weeks on, 4 weeks off).
- (b) **ENTRY/EXIT TO THE WORK SITE AND CHECKS ON COMMENCEMENT OF WORK** Entry/exit to the work site should be controlled and documented for both workers and other parties, including support staff and suppliers.
 - Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.
 - Training security staff on the (enhanced) system that has been put in place for securing the site and controlling entry and exit, the behaviours required of them in enforcing such system and any COVID - 19 specific considerations.
 - Training staff who will be monitoring entry to the site, providing them with the resources they need to document entry of workers, conducting temperature checks and recording details of any worker that is denied entry.
 - Confirming that workers are fit for work before they enter the site or start work. While procedures should already be in place for this, special attention should be paid to workers with underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.
 - Checking and recording temperatures of workers and other people entering the site or requiring self reporting prior to or on entering the site.
 - Providing daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.
 - During the daily briefings, reminding workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.
 - Preventing a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or (if that is not possible) isolating such worker for 14 days.
 - Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.
- (c) **GENERAL HYGIENE** Requirements on general hygiene should be communicated and monitored, to include:

- Training workers and staff on site on the signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular handwashing and social distancing) and what to do if they or other people have symptoms (for further information see WHO COVID-19 advice for the public and the National Regulations).
- Placing posters and signs around the site, with images and text in local languages.
- Ensuring handwashing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places throughout site, including at entrances/exits to work areas; where there is a toilet, canteen or food distribution, or provision of drinking water, at waste stations; at stores; and in common spaces. Where handwashing facilities do not exist or are not adequate, arrangements should be made to set them up. Alcohol based sanitizer (if available, 60-95% alcohol) can also be used.
- Setting aside an area for precautionary self-quarantine as well as more formal isolation of staff who may be infected prior to taking to healthcare facility

(d) **CLEANING AND WASTE DISPOSAL** Conduct regular and thorough cleaning of all site facilities, including offices, , common spaces etc. Review cleaning protocols for key construction equipment (particularly if it is being operated by different workers). This should include:

- Providing cleaning staff with adequate cleaning equipment, materials and disinfectant.
- Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.
- Where it is anticipated that cleaners will be required to clean areas that have been or are suspected to have been contaminated with COVID-19, providing them with appropriate PPE: gowns or aprons, gloves, eye protection (masks, goggles or face screens) and boots or closed work shoes. If appropriate PPE is not available, cleaners should be provided with best available alternatives.
- Training cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials).
- Any medical waste produced during the care of ill workers should be collected safely in designated containers or bags and treated and disposed of following relevant requirements (e.g., national, WHO).

(e) **ADJUSTING WORK PRACTICES** Consider changes to work processes and timings to reduce or minimize contact between workers, recognizing that this is likely to impact the project schedule. Such measures could include:

- Decreasing the size of work teams.
- Limiting the number of workers on site at any one time.
- Changing to a 24-hour work rotation.
- Adapting or redesigning work processes for specific work activities and tasks to enable social distancing, and training workers on these processes.
- Continuing with the usual safety trainings, adding COVID-19 specific considerations. Training should include proper use of normal PPE.
- Reviewing work methods to reduce use of construction PPE, in case supplies become scarce or the PPE is needed for medical workers or cleaners. This could include, e.g. trying to reduce the need for dust masks by checking that water sprinkling systems are in good working order and are maintained or reducing the speed limit for haul trucks.
- Arranging (where possible) for work breaks to be taken in outdoor areas within the site. • At some point, it may be necessary to review the overall project schedule, to assess the extent to which it needs to be adjusted (or work stopped completely) to reflect prudent work practices, potential exposure of both workers and the community and availability of supplies, taking into account Government advice and instructions.

(f) **PROJECT MEDICAL SERVICES** Consider whether existing project medical services are adequate, taking into account number of workers, medical staff, equipment and supplies, procedures and training. Where these are not adequate, consider upgrading services where possible, including:

- Training medical staff, which should include current WHO advice on COVID-19 and recommendations on the specifics of COVID-19. Where COVID-19 infection is suspected, medical providers on site should follow WHO interim guidance on infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected.
- Training medical staff in testing, if testing is available.
- Assessing the current stock of equipment, supplies and medicines on site, and obtaining additional stock, where required and possible. This could include medical PPE, such as gowns, aprons, medical masks, gloves, and eye protection. Refer to WHO guidance as to what is advised (for further information see WHO interim guidance on rational use of personal protective equipment (PPE) for COVID-19).
- If PPE items are unavailable due to world-wide shortages, medical staff on the project should agree on alternatives and try to procure them. Alternatives that may commonly be found on construction sites include dust masks, construction gloves and eye goggles. While these items are not recommended, they should be used as a last resort if no medical PPE is available.
- Establishing an agreed protocol for communications with local emergency/medical services.
- Agreeing with the local medical services/specific medical facilities the scope of services to be provided, the procedure for in-take of patients and (where relevant) any costs or payments that may be involved.
- A procedure should also be prepared so that project management knows what to do in the unfortunate event that a worker ill with COVID-19 dies. While normal project procedures will continue to apply, COVID-19 may raise other issues because of the infectious nature of the disease. The project should liaise with the relevant local authorities to coordinate what should be done, including any reporting or other requirements under national law.

(g) INSTANCES OR SPREAD OF THE VIRUS WHO provides detailed advice on what should be done to treat a person who becomes sick or displays symptoms that could be associated with the COVID-19 virus (for further information see WHO interim guidance on infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected). The project should set out risk-based procedures to be followed, with differentiated approaches based on case severity (mild, moderate, severe, critical) and risk factors (such as age, hypertension, diabetes) (for further information see WHO interim guidance on operational considerations for case management of COVID-19 in health facility and community). These may include the following:

- If a worker has symptoms of COVID-19 (e.g. fever, dry cough, fatigue) the worker should be removed immediately from work activities and isolated on site.
- If testing is available on site, the worker should be tested on site. If a test is not available at site, the worker should be transported to the local health facilities to be tested (if testing is available).
- If the test is positive for COVID-19 or no testing is available, the worker should continue to be isolated. This will either be at the work site or at home. If at home, the worker should be transported to their home in transportation provided by the project.
- Extensive cleaning procedures with high-alcohol content disinfectant should be undertaken in the area where the worker was present, prior to any further work being undertaken in that area. Tools used by the worker should be cleaned using disinfectant and PPE disposed of.
- Co-workers (i.e. workers with whom the sick worker was in close contact) should be required to stop work, and be required to quarantine themselves for 14 days, even if they have no symptoms.
- Family and other close contacts of the worker should be required to quarantine themselves for 14 days, even if they have no symptoms.
- If a case of COVID-19 is confirmed in a worker on the site, visitors should be restricted from entering the site and worker groups should be isolated from each other as much as possible.
- If workers live at home and has a family member who has a confirmed or suspected case of COVID19, the worker should quarantine themselves and not be allowed on the project site for 14 days, even if they have no symptoms.
- Workers should continue to be paid throughout periods of illness, isolation or quarantine, or if they are required to stop work, in accordance with national law.
- Medical care (whether on site or in a local hospital or clinic) required by a worker should be paid for by the employer.

(h) CONTINUITY OF SUPPLIES AND PROJECT ACTIVITIES Where COVID-19 occurs, either in the project site or the community, access to the project site may be restricted, and movement of supplies may be affected.

- Identify back-up individuals, in case key people within the project management team (PIU, Supervising Engineer, Contractor, sub-contractors) become ill, and communicate who these are so that people are aware of the arrangements that have been put in place.
 - Document procedures, so that people know what they are, and are not reliant on one person's knowledge.
- Understand the supply chain for necessary supplies of energy, water, food, medical supplies and cleaning equipment, consider how it could be impacted, and what alternatives are available. Early pro-active review of international, regional and national supply chains, especially for those supplies that are critical for the project, is important (e.g. fuel, food, medical, cleaning and other essential supplies). Planning for a 1-2-month interruption of critical goods may be appropriate for projects in more remote areas.
- Place orders for/procure critical supplies. If not available, consider alternatives (where feasible).
- Consider existing security arrangements, and whether these will be adequate in the event of interruption to normal project operations.
- Consider at what point it may become necessary for the project to significantly reduce activities or to stop work completely, and what should be done to prepare for this, and to re-start work when it becomes possible or feasible.

(i) TRAINING AND COMMUNICATION WITH WORKERS: Workers need to be provided with regular opportunities to understand their situation, and how they can best protect themselves, their families and the community. They should be made aware of the procedures that have been put in place by the project, and their own responsibilities in implementing them.

- It is important to be aware that in communities close to the site and amongst workers without access to project management, social media is likely to be a major source of information. This raises the importance of regular information and engagement with workers (e.g. through training, town halls, tool boxes) that emphasizes what management is doing to deal with the risks of COVID-19. Allaying fear is an important aspect of work force peace of mind and business continuity. Workers should be given an opportunity to ask questions, express their concerns, and make suggestions.
- Training of workers should be conducted regularly, as discussed in the sections above, providing workers with a clear understanding of how they are expected to behave and carry out their work duties.
- Training should address issues of discrimination or prejudice if a worker becomes ill and provide an understanding of the trajectory of the virus, where workers return to work.
- Training should cover all issues that would normally be required on the work site, including use of safety procedures, use of construction PPE, occupational health and safety issues, and code of conduct, taking into account that work practices may have been adjusted.
- Communications should be clear, based on fact and designed to be easily understood by workers, for example by displaying posters on handwashing and social distancing, and what to do if a worker displays symptoms.

(j) COMMUNICATION AND CONTACT WITH THE COMMUNITY Relations with the community should be carefully managed, with a focus on measures that are being implemented to safeguard both workers and the community. The community may be concerned about the presence of non-local workers, or the risks posed to the community by local workers presence on the project site. The project should set out risk-based procedures to be followed, which may reflect WHO guidance (for further information see WHO Risk Communication and Community Engagement (RCCE) Action Plan Guidance COVID-19 Preparedness and Response). The following good practice should be considered:

- Communications should be clear, regular, based on fact and designed to be easily understood by community members.
- Communications should utilize available means. In most cases, face-to-face meetings with the community or community representatives will not be possible. Other forms of communication

should be used; posters, pamphlets, radio, text message, electronic meetings. The means used should take into account the ability of different members of the community to access them, to make sure that communication reaches these groups.

- The community should be made aware of procedures put in place at site to address issues related to COVID-19. This should include all measures being implemented to limit or prohibit contact between workers and the community. These need to be communicated clearly, as some measures will have financial implications for the community (e.g., if workers are paying for lodging or using local facilities). The community should be made aware of the procedure for entry/exit to the site, the training being given to workers and the procedure that will be followed by the project if a worker becomes sick.
- If project representatives, contractors or workers are interacting with the community, they should practice social distancing and follow other COVID-19 guidance issued by relevant authorities, both national and international (e.g., WHO).

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