



## **ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN**

### **CONSTRUCTION OF THE CYBER SECURITY OFFICE**

MORNE JALOUX, ST GEORGES GRENADA



**MINISTRY OF MOBILISATION, IMPLEMENTATION AND TRANSFORMATION**

**GOVERNMENT OF GRENADA**

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# 1.0 INTRODUCTION

The Government of Grenada (GoG) is implementing the Caribbean Digital Transformation Project with World Bank Group (WBG) funding. The development objective of the regional project is to increase access to digital services, technologies and skills by governments, businesses, and individuals in the participating Eastern Caribbean countries. The project is expected to contribute to increased digital connectivity, digital public services, and the creation of technology-enabled businesses and jobs across the participating countries: the Commonwealth of Dominica, Grenada, Saint Lucia, and Saint Vincent and the Grenadines. The project consists of the following components:

- ✓ **Component 1:** Digital Enabling Environment: This component will support the development of a positive enabling environment for the region's digital economy that drives competition, investment, and innovation while promoting trust and security of online transactions.
- ✓ **Component 2:** Digital Government Infrastructure, Platforms, and Services: This component will support public sector modernization, resilience, and delivery of digital public services to individuals and businesses.
- ✓ **Component 3:** Digital Skills and Technology Adoption: This component aims to better equip individuals and businesses across the region for future jobs and economy and spur innovation and productivity growth. (*Details of the CARDTP project can be found on the CARDTP website: [cardtp.gov.gd](http://cardtp.gov.gd).)*

Under Component 2 of the project, the GoG proposes constructing a building in Morne Jaloux, Grenada, dedicated to housing the cybersecurity agency. This activity's environmental and social risks are addressed under the Environmental and Social Management Framework (ESMF) for the project. Based on the screening conducted for this project (see Annex 1), an Environmental and Social Management Plan (ESMP, this document) is required to identify and appropriately manage environmental and social risks. This ESMP provides guidelines and requirements to ensure the protection of construction workers, government workers (the future occupants of the building), and the community from environmental and social risks associated with the Cyber Security Building, mainly waste management, worker and community health and safety, and timely and clear public information. The ESMP will ensure that the construction and operation of the cyber security building are done in compliance with national and regional environmental regulations and consistent with international best practices, as well as the World Bank Environmental and Social Framework (ESF) under the ESMF created for the project.

This ESMP will be disclosed on the GoG website and/or Facebook page of the Ministry of Economic Development, Planning, Tourism, ICT Creative Economy, Culture, Agriculture and Lands, Forestry, Marine Resources, and Cooperatives. The disclosure records will be documented and recorded.

## 2.0 Project Description

This section focuses on the existing conditions and specific works related to the design, construction, and operations of the Cybersecurity agency building. General information on the environmental and social baseline conditions relevant to the Grenadian context is provided in the project ESMF document and is not repeated here.

### Project Site

The project site is in Morne Jaloux, coordinates N 12.031712 and W -61.732239, an area of moderate slopes with some areas of 20-30 degrees. The size of the land for the project is approximately 20,000 square feet. The topsoil consists mainly of clay with sand. The bedrock is of volcanic origins called pyroclastic Tuff. It's a locally pronounced tuff. This is an extrusive lithified rock made of ash, sands, silts, and gravels with the occasional isolated boulder. The vegetation on the site consists of tertiary successional vegetation, mainly shrubs and grasses of no economic value.

The Government of Grenada owns the land and vegetation on it. There is a single mango and breadfruit tree on the property, which will be removed for the building. There is no evident fauna on the land except for a few birds that occupy the mango tree and some butterflies.

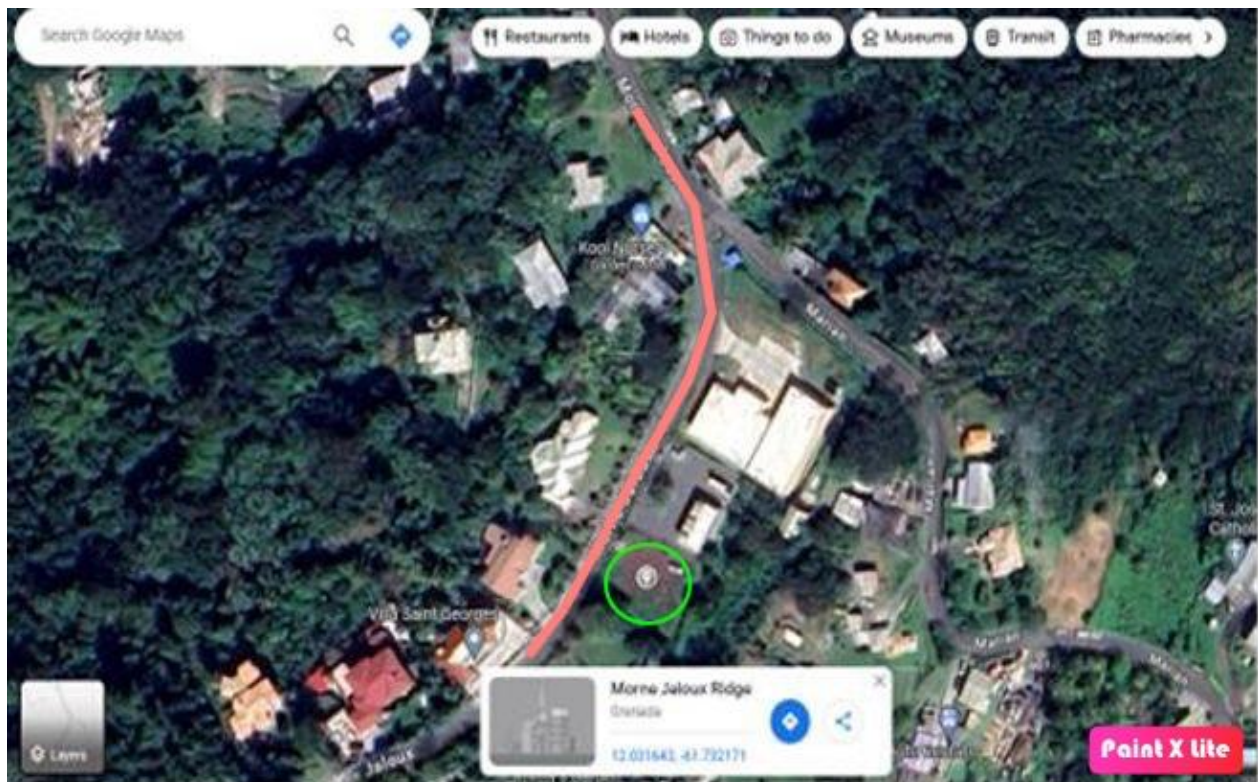


Image 1: Location of Project Site

### Description of the Social Surroundings

The building will be in a built-up area of St. George's, the capital city of Grenada. Morne Jaloux, the proposed site, was previously an estate. It has since been converted to residential and commercial land uses. The site is bordered by residential and other government properties, including the National Disaster Management Agency (NADMA) office.

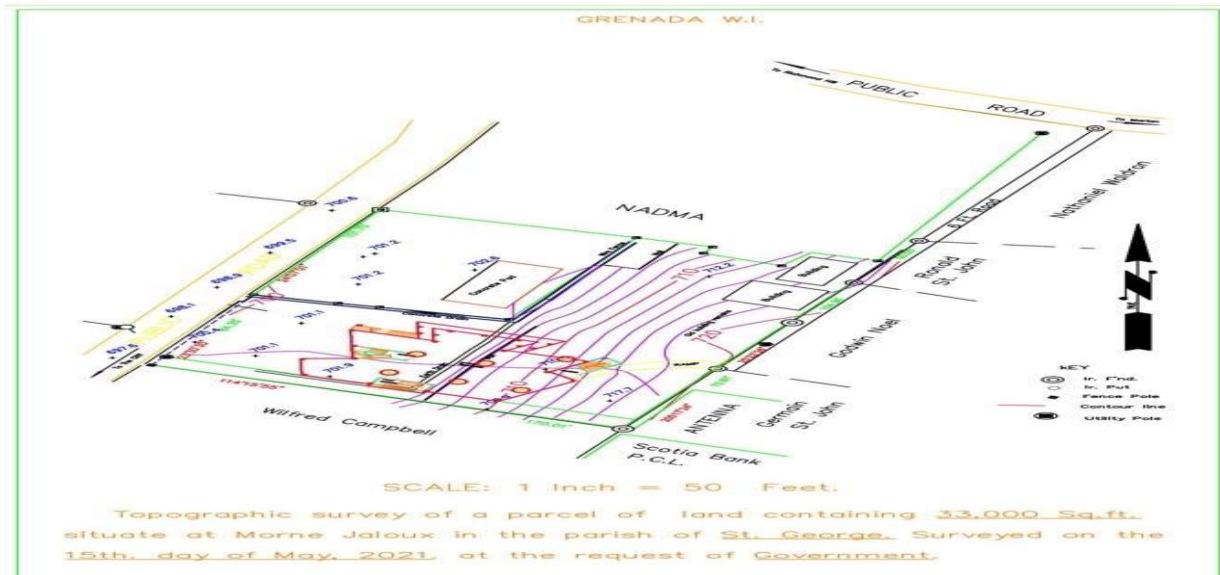


Figure 1: Social setting of the project site showing surrounding land use

To the North of the building is the NADMA property, and to the South is a residential dwelling home. On the Eastern side is an empty plot with shrubs and grasses, and on the Western side is a 16-inch drain parallel to the main road. There are earthen drains on the east and south that are 5 feet to 7 feet in width.



Image 2: Eastern boundary of the site along the masonry wall (Eastern end)



Image 3: Concrete Box drain along NADMA Premises (Northern end)

Two other residential dwellings are on the opposite side of the main road. The residential properties in the area can be considered upper-middle class status. The buildings are concrete structures with three or four bedrooms. The immediate properties around the site have existed for about 30 years.



**Image 4: Dwelling on the west of the project site (Western end)**

The site is accessible by the main road, which runs from East to West.



**Image 5: Proposed site access along Morne Jaloux Road**

The estimated traffic on the main road, which residents, and others, including government agency workers, use, is 100 persons<sup>1</sup>. However, the numbers may be higher presently as commuters use it as a bypass to avoid congestion on other roads in the area.

## Building Description

The Cybersecurity building is a two-story facility designed to cater to the needs of Grenada's national cybersecurity and operational center for digital services within the public sector. This structure will be a hub for remote and backend functions essential for ICT (Information and Communication Technology) and digital transformation initiatives. Key functionalities of the NOC include a Help Desk, Remote Network Monitoring capabilities, dedicated space for robust computer systems and devices, and areas for staff gatherings and training sessions.

Primarily, the NOC will function as the central network operating center for monitoring the national data center and overseeing network activities under the CARCIP (Caribbean Regional Communications Infrastructure Program) project. Additionally, it will play a critical role in monitoring external internet traffic originating from government and school networks. The NOC aims to enhance cybersecurity, ensure the efficient operation of digital services, and contribute to the overall advancement of ICT infrastructure in Grenada.

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<sup>1</sup> This number was calculated from previous traffic studies done in the area. by the Ministry of Infrastructure.

The building will house the core backend staff, which will be about 10 to 12 staff at any given time, but it will also serve as the main gathering point for ICT meetings and stakeholder consultation.

## Building Features

### Exterior

#### Building Form:

- A modern and secure design with minimalistic aesthetics.
- Retaining reinforced concrete walls to mitigate against soil erosion
- Exterior finishes to include durable materials such as concrete blocks, with a focus on resilience and durability

#### Ground floor:

- Area: 4879 Square feet
- Exterior walls: 8" thk hollow concrete blocks filled and reinforced (security requirement)
- Interior walls: 8" thk hollow concrete blocks
- 

#### First floor:

- Area: 5034 Square feet
- Exterior walls: 6" thk hollow concrete blocks
- Interior walls: 6" thk hollow concrete blocks & prefabricated 4" sheet rock

#### Entrance:

- Controlled access points with secure entry systems.
- The foyer is designed for visitor screening and identity verification.

#### Windows and Doors:

- Reinforced windows with shatter-resistant glass.
- Secure entrance doors with access control from the top floor to the ground floor.
- Hurricane-proofing system for windows.

### Interior:

#### Layout:

- Two floors are designed for specific functionalities.
- Ground floor for cybersecurity operations and monitoring.
- The operational staff of the ICT department will sit in cubicles to conduct their work.
- First floor for offices and collaborative spaces.
- Living in space for team members in the event of a cyber emergency and extended work hours during crises.

#### Office Spaces:

- Open plan offices for collaboration.
- Private offices for sensitive discussions.
- Ergonomic furniture for employee comfort.

#### Conference Rooms:

- Well-equipped conference rooms with advanced audiovisual systems.
- Secure video conferencing capabilities.
- Overhead projectors and monitors

#### Server Room:

- A dedicated and secure server room with climate control is needed.
- Redundant power supply and backup systems.
- Raised flooring to protect equipment in case of floods.



## Technological Infrastructure:

### Network Infrastructure:

- Advanced network cabling for high-speed data transfer.
- Redundant network connections for reliability.

### Cybersecurity Equipment:

- State-of-the-art threat detection tools and software.
- Secure storage for cybersecurity hardware.

## Security Measures:

### Surveillance Systems:

- CCTV cameras strategically placed for comprehensive coverage.
- Surveillance monitoring room with real time access.
- Angled façade for maximum monitoring of surroundings at the main entrance from public road

### Access Control:

- Card key access for restricted areas.

## Sustainable Features:

### Energy Efficiency:

- LED lighting throughout the facility.
- Energy efficient Air conditioning system

### Water Management:

- Rainwater harvesting system for non-potable water use.
- Low flow plumbing fixtures for water conservation.

## 5. Safety Features:

### Fire Safety:

- Advanced fire detection system at the Cyber Security and Server rooms.
- Emergency exits and evacuation plans.
- Fire exit door with panic bar on the interior (specification=FD60 rating- 60 minutes of fire resistance on all floors)

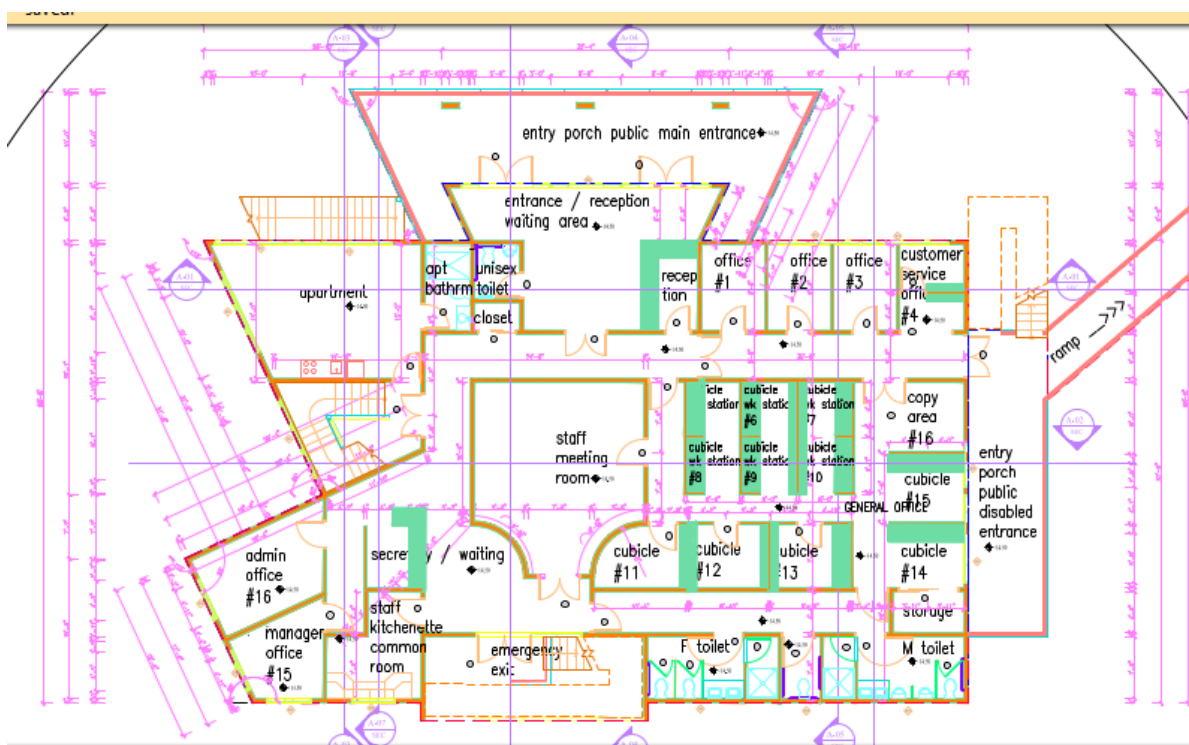


Figure 2: Floor plan showing fore exits

### Emergency Power

- Backup generators to ensure continuous operations during power outages.

### Walls

- A thicker wall will ensure added security to the ground floor.

### Universal Access:

Ramped access to the service entrance on the ground floor

Interior ramp access to work areas of the ground floor to facilitate easy heavy-duty equipment installations and physically challenged individuals

Raised wooden floor and ceiling spaces to accommodate all M&E mechanical and electrical installations.

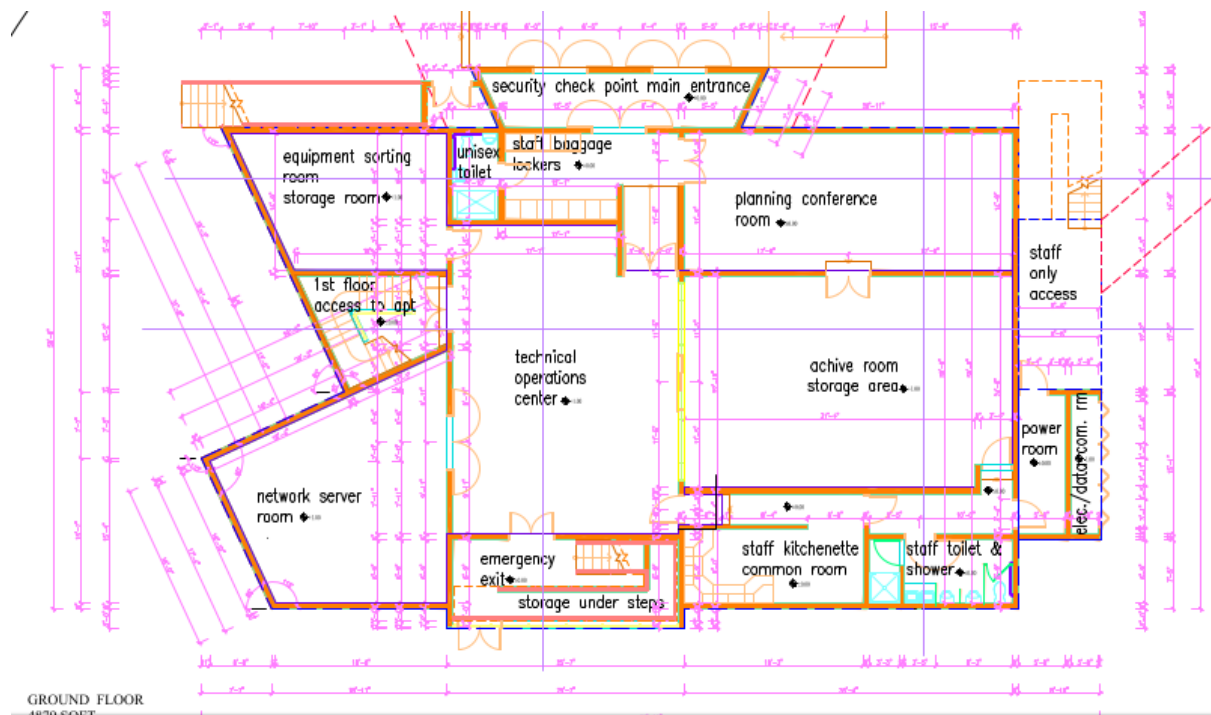


Figure 2: Floor layout showing universal access

### 3.0 THE LEGAL AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL MANAGEMENT

The legal framework for the project is guided by several national laws, which can be found in the project's ESMF. In addition, as per World Bank Environmental and **Social Standards (ESS)**, the CARDTP Project is a Moderate risk project, meaning that any negative environmental and social impacts are site-specific, few, if any of them are irreversible. In most cases, mitigation measures can be designed more readily than for projects with significant adverse negative impacts. The Following Environmental and Social Standards (ESS) apply to this project activity:

The World Bank ESS, which are relevant to the project, are as follows:

**ESS 1 Assessment and Management of the Environmental and Social Risks and Impacts** - to help ensure the project's environmental and social soundness and sustainability. 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 project's direct and indirect environmental impacts and recommend mitigation measures.

**ESS 2 Labour and Working Conditions**- addresses the risks associated with the physical and other works. The standard promotes sound worker-management relationships and enhances the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. It promotes safety and health at work and the fair treatment, nondiscrimination and equal opportunity of project workers as well as protects project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, per this ESS), and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. The ESMP contains mitigation measures to address labor risks identified in the environmental screening exercise.

**ESS3: Resource Efficiency and Pollution Prevention and Management** establishes the requirements for addressing air, water, and land pollution that project activities may generate. In addition, project activities may consume finite resources that threaten people, ecosystem services, and the environment at the local, national, and regional levels. The environmental screening of the project identifies the resources that the project will utilize and the mitigation measures to address resource efficiency and pollution prevention and management. The project seeks to avoid, minimize, and/or manage project-related nonhazardous and hazardous waste, including e-waste.

The project will also promote the sustainable use of energy and water during the construction and operational phases as necessary.

**ESS4: Community Health and Safety** addresses the health, safety, and security risks and impacts on project-affected communities and the measures to avoid or minimize such risks and impacts, with particular attention to vulnerable people. The standard is relevant. The construction and operation of the center will occur in a residential community. There will be associated activities such as the transportation of materials, and equipment, which may increase the risk of traffic hazards.

**ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources** addresses the protection and conservation of biodiversity and sustainable management of living natural resources, including ecological functions of habitats, including forests and the biodiversity they support. The standard is currently relevant. At the same time, the construction activities will not occur near natural or critical habitats.

The project will occur in a built area but in the natural environment. The environmental screening has identified the risks related to this standard and will seek to avoid associated activities to the extent possible.

**ESS8: Cultural Heritage** assists in preserving cultural heritage and avoiding destruction or damage. Cultural heritage includes both tangible and intangible heritage. Tangible cultural heritage includes archaeological, paleontological, historical, architectural, and religious resources (including graveyards and burial sites) and aesthetic or other cultural significance. Intangible cultural heritage comprises practices, representations, expressions, knowledge, skills- as well as the instruments, objects, artifacts, and cultural spaces associated therewith. The project activities will not occur near physical, cultural, and/or archaeological heritage sites; the standard is considered relevant because of the construction activities may result in chance find. The project will rely on a Chance Find procedure as part of the construction contracts to be awarded under the project.

**ESS10: Stakeholder Engagement and Information Disclosure** is an essential component of good governance for the Government of Grenada and applies to all projects funded by the World Bank. The ESS recognizes the importance of open and transparent engagement between project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve projects' environmental and social sustainability, enhance project acceptance, and significantly contribute to successful project design and implementation. The project will implement the project-level Stakeholder Engagement Plan (SEP), and the contractor will develop and implement his/her SEP.

## 4.0 Site-Specific Environmental and Social Impacts

Implementing appropriate mitigation and management measures will assist in reducing any potential negative impacts from the construction of the Cybersecurity building. Table 1 outlines several measures the contractor must implement 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 close to the site are several residential buildings (houses) and the office of the National Disaster Management Agency (NADMA) in the in-direct Area of Influence. The houses are occupied by families of between one to five persons. Residents also have cars used to commute to work and for household tasks. The office of the NADMA is utilized for the agency's everyday functioning. 10 workers occupy the building during normal operations. The building also hosts national disaster committee meeting, which usually involves about 20-30 persons. In the event of a national emergency, the building will be the command center for national emergency response. It will be occupied by the national disaster committee, including the Prime Minister.

Mitigation measures such as developing and implementing a traffic management plan and a site management plan are included to ensure residents continued free access to and from their homes. The NADMA is an important agency in Grenada, and its workers' continued access to the building is important. Potential impacts of noise and dust pollution associated with construction activities will also require measures to mitigate to ensure that the project activities do not affect the residents' quality of life in the area.

The project site is in an area of mixed residential and commercial activity and includes vehicular and pedestrian traffic. The environmental and social mitigation measures listed in Table 3 address the use of roadways, traffic congestion, pedestrian safety, damage to existing road infrastructure, and the deposit of soil and sedimentation on the roadway. These measures will safeguard this existing road infrastructure. Though there are few houses and one government office in the immediate area of the site (Direct Area of Influence), the road is often used as a bypass by residents and workers. The contractor will, therefore, erect signage to indicate the time of hauling and movement of equipment and vehicles so that residents can be advised. Part of the traffic management plan will include engagements with residents of the

To ensure that the other sensitive receptors in proximity to the site, mainly the government office and residential buildings near the site, 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, 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 Morne Jaloux area is not located near any major watershed or the sea, so the potential for runoff to pollute the marine environment or any watershed is very low. However, the contractor will be expected to adhere to the guidelines in Table 3 below to ensure that sedimentation to drains in the neighborhood is not impacted. The project is not expected to contribute to flooding as the site is small, and the drains in the area are adequate and functional.

Though the area has mild slopes, it is not expected that any soil erosion processes of soil movement will occur. No slopes are expected to be modified in the land clearance and geo-structural activities. The project employed a structural geologist, and a structural study of the project site was completed.

The project will not utilize the use and demand of freshwater resources or have any negative impacts on nearby surface waters. No other impacts on surface water or bodies of water were identified.

The project's social impacts on nearby receptors are mixed. The positive social impacts will include improved cybersecurity in Grenada and the improvement of the country's digital network. Other positive social impacts included limited employment for about 20 persons during construction. These persons will come from other areas in Grenada as the immediate surrounding area is a middle-class area of professionals. The employment of these persons will result in income means of sustenance for the twenty households. Through consultations with neighborhoods, they have expressed concerns about the presence of the workers in their neighborhoods and the potential for conflict with the workers. Mitigation measures in the ESMP include a Code of Conduct for workers.

*Table 1: List of Potential Environmental and Social Impacts*

Positive Impact	Limited employment opportunities created both during construction and operations of the new facility
	Improved digital operations including digital governance
	Improved cyber security in Grenada
Negative Impacts	Increased vibration and noise level during civil works disturbing users of residents and employees in nearby offices.
	Increased 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,
	Construction waste generation and improper disposal
	Increased sedimentation of drains and other waterways
	Traffic delays/congestion caused by road detours or closures during the works,
	Increased traffic, especially heavy vehicles such as trucks in the main street
	Occupational safety and health risk to workers on the construction site including sexual harassment and Gender Based Violence.
Conflict between neighbours and construction workers	

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 documents.

## Purpose of the ESMP

Development activities often have unintended impacts on people and the environment. National laws and the World Bank's ESS are crafted to prevent and mitigate undue harm to people and their environment in the development process.

This ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during the 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, minimize or offset adverse impacts and promote beneficial impacts, enhancing the overall environmental performance of this activity. Effective environmental and social management can only be achieved if it is carried out within a formalized 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 and socially sustainable project that meets its intended purpose, functions efficiently throughout its life, and results in minimal adverse environmental and social 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 that might prejudice the project's environmental and social performance.

Environmental and social management procedures 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 strong commitment at all project management levels and in all bodies concerned if worthwhile results are to be achieved. Effective and timely liaison between the various relevant bodies is also vital.

Environmental and social monitoring is a basic tool for project management's decision-making. It should be organized to facilitate the early recognition of potential problems so that appropriate remedial action can be initiated before serious environmental or social damage, danger, or inconvenience has been caused.

## 5.0 INSTITUTIONAL ARRANGEMENTS

As shown in Figure 3 implementing this ESMP requires the involvement of several stakeholders, each with different roles and responsibilities, to ensure sound environmental and social management.

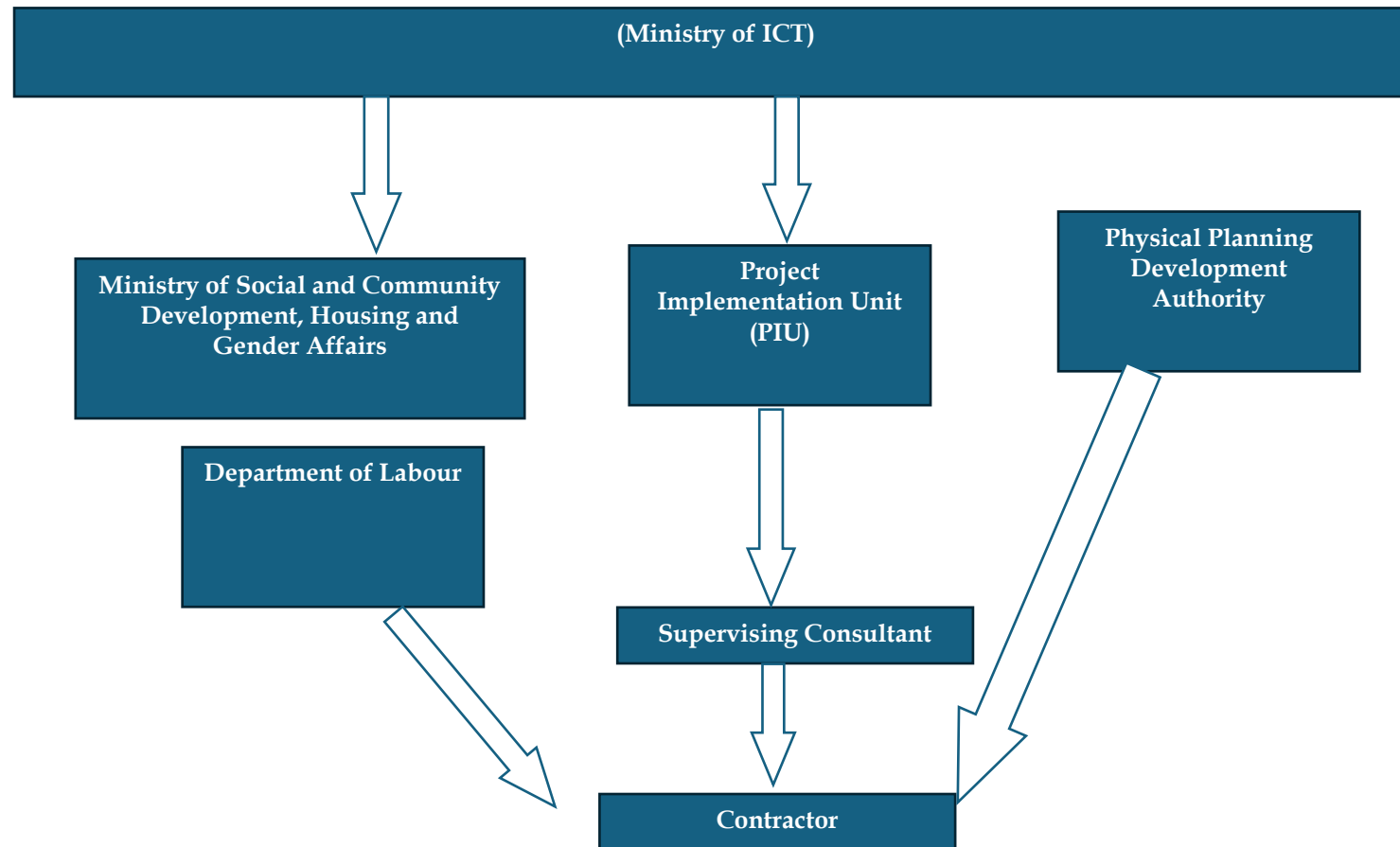


Figure 3: Institutional Arrangements for Environmental and Social Management



## Roles and Responsibilities

### Ministry of ICT

- Provide overarching supervision of the PIU and the sub-project
- Ensure that the PIU meets the environmental and social commitments of the Government of Grenada and the World Bank.
- Represent the Government of Grenada in meetings related to sub-projects as the implementing agency.

### Project Implementation Unit (PIU)

**The project implementation unit comprises of the project manager, the Procurement team, the project's environmental and social specialist and the finance team**

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.

Engaging with project stakeholders.

Socialization of the Grievance Redress Mechanism and addressing any grievance as per the GRM procedures.

Systematically document evidence of its activities and outcomes and provide information to the World Bank team as needed.

Support with the necessary and required permits from government authorities.

Together with the Supervision Consultant drafting the Environmental, Social, Health and Safety requirements in the bidding and contract documents in accordance with the ESMP; integrating the ESMP in to contract documents.

Review and approve of the various documents prepared by the Contractor such as CESMP, code of conduct, labor procedures, job hazard analysis, monitoring reports, etc.

Provide recommendations for implementation of corrective actions for any noncompliance's and suggest improvements for contractor's performance.

Investigate, with Supervisor's support all incidents related to environmental, social and health aspects. Carry out root cause analysis for all major incidents, and recommended actions to be taken to rectify the failure that led to these incidents. Implement the above roles for the Ministry of ICT et al.

### Physical Planning and Development Authority

- Approval of all building plans and provide building guidelines
- Permitting physical works by implementing all physical planning policies
- Provide guidance on sustainable land practices

### Ministry of Legal Affairs, Labour & Consumer Affairs

- Through the Labour Department ensure that the sub-project adheres to all national Occupational Health and Safety regulations.

### Ministry of Social and Community Development, Housing and Gender Affairs

- To provide guidance and support in mainstreaming gender and social protection in the project activities, including resolving issues from the GRM.

### Supervisor Consultant

- Oversee the implementation of the ESMP by the contractor
- Ensure that adequate ESHS staff are appointed for the Project.
- Inform their own personnel through environmental awareness training of their roles and responsibilities in terms of the ESMP during operations
- Supervision of the implementation of the CESMP and its related sub-plans by the Contractor
- Supervise works, ensuring compliance with all design parameters including quality requirements and ESMP implementation.
- Ensure that all staff and personnel have signed the Code of Conduct under this Project.
- Provide guidance to the Contractor on implementation of ESHS aspects and provide training to the Contractor's staff if necessary.
- Prepare weekly progress reports on ESHS performance and monitoring to submit to PIU.
- Support with the investigation and reporting of all incidents related to environmental, social and health aspects. Carry out root cause analysis for all major incidents, and recommended actions to be taken to rectify the failure that led to these incidents
- Support the PIU with consultations with the stakeholders.
- Review and advise PIU on compliance, of the various documents prepared by the contractor such as CESMP, code of conduct, labour procedures, job hazard analysis, monitoring reports, and so on.
- Inform the PIU of any incidents and accidents immediately upon learning of such incidents
- 

### The Contractor

- Obtain all necessary licenses/permits from relevant agencies.
- Responsible for implementing measures to address all the social and environmental requirements.
- Responsible for developing site-specific plans as needed, such as Traffic management plans and workers' codes of conduct.
- 
- Implement all the measures as identified in this ESMP and as instructed by PIU.
- Implement all mitigation measures to address potential environmental and social risks and impacts as described in the ESMP and CESMP.
- Review the CESMP periodically, at least quarterly, and update in a timely manner.
- Conduct toolbox training to the laborers on health and safety risks of the Project works.
- Report all accidents and incidents within 24hrs to the supervision consultant and PIU and facilitate incidents investigation.
- Nominate an ESHS staff who will be responsible for implementing the Contractors' environmental, social, health and safety responsibilities, and liaising with government agencies.
- Inform staff through environmental awareness training of their roles and responsibilities in terms of the ESMP during operations;

- Have a complaint and communication procedure in place and operate it accordingly. Report where necessary, as described in this ESMP.
- Prepare monthly ESHS reports on ESMP implementation.
  
- Comply with all relevant national regulations such as Waste Management and Labour Acts
- To implement these requirements successfully, it is necessary to hire professionals with the appropriate project management and other specialist skills. These should include the Site Supervisor, Occupational Health and Safety Officer, and Environmental Monitoring Officer.
- Developing a Grievance Redress Mechanism for workers and addressing project grievances.
- Draft and implement a Code of Conduct that all workers follow. The Code should include E&S and SEA/SH measures.
- Make sure that all workers have signed the Code of Conduct prior to the start of works and have followed training in Gender Based Violence sensitization.

## 6.0 PROJECT PHASES AND ENVIRONMENTAL AND SOCIAL MANAGEMENT

### Pre-Construction Phase

For environmental **and social** management, the pre-construction phase is considered to extend from the initial stages of project preparation to CARDTP 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 the World Bank Environmental and Social Standards are collated before the** commencement of construction;

Detailed designs incorporate appropriate, specific features aimed at minimizing adverse impacts and enhancing beneficial impacts;

Bid documents for contractors contain appropriate clauses to require the effective and efficient control of environmental and social impacts arising from construction activities;

**The project stakeholder engagement plan addresses communications on the works, including the GRM's socialization. The project GRM is available and operational, and consultations and awareness sessions are conducted with relevant stakeholders.**

The design recommendations for improved environmental and social 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 practices 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

### 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 **the** 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 and social impacts;

Ensuring that contractors are properly briefed about the importance of environmental and social protection during construction and

Managing environmental and social aspects of construction implementation so 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 **World Bank ESS**.

**Environmental and social submissions are required** as part of the bid.

Construction supervision will include monitoring and reporting on environmental and social aspects **daily**.

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 imposed on contractors to minimize the occurrence and severity of construction impacts.

Emphasis on the need for pricing **bids to consider compliance with environmental and social requirements set out in the bid documents** to facilitate compliance.

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 Contractor's ESMP (**CESMP**). The CESMP shall provide details such as the Contractor's commitment to environmental protection, the 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 implementing the ESMP.

- Construction Programme
- Environment, Social, Health, and Safety Policy Statement
- Workers' Code of Conduct
- Health and Safety Plan
- Traffic Management Plan

The relevant authorities, such as the Physical Planning Authority, Ministry of Infrastructure, Ministry of Economic Development, Planning, Tourism, Creative Economy, Culture, Agriculture and Lands, Forestry, Marine Resources and Cooperatives, Ministry of Legal Affairs, Labour & Consumer Affairs, **Ministry of Legal Affairs, Labour & Consumer Affairs, Ministry of Social and Community Development, Housing and Gender Affairs and Physical Planning Development Authority** should review these submissions 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 from 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 CARDTP 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.

## Operations Phase Environmental and Social Management Activities and Responsibilities

This phase commences when construction is finalized, at which point the Ministry of Economic Development is expected to assume responsibility for facility management. The Ministry of Economic Development should enlist the support of relevant agencies, such as the Ministry of Infrastructure, in developing a maintenance plan to address operations phase requirements from inception and guide the Ministry's inspection and maintenance protocols.

The Ministry of Economic Development will also be responsible for landscaping, including maintaining new vegetation in the long term. Management requirements will be most onerous early in the operational phase, as vegetation planted will still be establishing and maturing. Once the vegetation is established, the attention required will significantly decline and be limited to nominal maintenance, which the Ministry should have sufficient capacity to manage.

## 7.0 ENVIRONMENTAL AND SOCIAL MONITORING AND REPORTING

Environmental and social monitoring can help determine if construction works **impact** the environment and people. This can help assess the effectiveness of mitigation measures and provide early warning of **any** pollution, impacts on **quality of life**, and other incidents so that corrective action can be taken. Monitoring is an essential tool concerning environmental and social management as it provides the basis for rational decisions regarding impact control. The monitoring for this project will be undertaken to check on whether mitigation and benefit enhancement measures have 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 **using** inspection and/or inquiries; 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 **most** impact controls take the form of environmental and social protection measures incorporated in the design and contract documents, and the extent to which the **contractor(s) complies with these** plays a major part in determining the overall environmental and social performance of the project. Compliance monitoring **allows** a rapid response to construction impacts. **No effects monitoring is** recommended for this project.

### 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 **an** Environmental and Social Compliance Monitoring Officer to **observe all site activities systematically**. This person may have other responsibilities **if** 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 emphasize the early identification of environmental and social problems and the initiation of suitable remedial action through communications with contractors. Where remedial actions have been required, further checks will need to be made to ensure these are implemented according to the agreed schedule and in the required form. As experience of the principal problem areas is gained, attention will be concentrated on activities that are known to be the most troublesome.

The Supervising Consultant's Environmental and Social Compliance Monitoring Officer will report to his/her Project Manager daily, using conventional report forms whose coverage will be extended to include key environmental and social matters (**see Appendix 4 for A E&S 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 and Social Compliance

Monitoring Officer regarding environmental and social matters. **Regarding** 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 if** environmental severe damage or public nuisance/safety hazard is either imminent or has already been caused.

Weekly reports prepared by the Project Manager will summarize the results of the daily site monitoring, remedial actions that have been initiated, and whether the resultant action is having the desired result. Weekly reports will be submitted to the supervision consultant who will review, verify and forward to the PIU. The reports will also identify any unforeseen environmental problems and will recommend suitable additional actions. The supervision consultant as part of their duties will monitor the works including the ESMP implementation.

## Monitoring by CARDTP and Governmental Agencies

The Client, represented by the CARDTP Project Engineer, will inspect the works periodically to ensure that the contractor follows approved documents. Statutory agencies may also monitor and investigate matters arising from public complaints concerning implementing any project components that fall under their 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 commencing their monitoring.

## Progress Meetings and Monthly Reports

**Bi-monthly** meetings should be convened with the PIU, the Supervising Consultant, **and the Contractor** in attendance. The Environmental and Social Compliance Monitoring Officer should also be present. The fortnightly progress meetings shall include an agenda item specifically covering environmental and social matters particularly those highlighted in the weekly report. Since environmental and social matters will likely form a relatively small part of the overall business to be discussed at such meetings, this can be the first item on the meeting agenda.

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

## Costs Associated with Environmental and Social Management Plan Implementation

Costs to the contractors for complying with environmental and social protection clauses in the contract, including approved environmental and social plans, will be incorporated in unit rates and bill items, and thus included in the bid prices. Generally, compliance with environmental and social protection clauses requires the contractors to behave responsibly with the environment following good international construction practices. Environmental and social management and monitoring should be integral to construction supervision duties and will be covered by the construction supervision budget.



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

**Table 2: ESMP Implementation Costs incurred by Contractors**

<b>ESMP Activity incurring cost</b>	<b>Estimated cost (US\$)</b>
Signage for vehicular and pedestrian traffic management (8 signs @ USD 700)	3, 595.00
Traffic safety provisions (barriers, cones, lighting, etc.)	4, 000.00
Public announcements and communications with stakeholders	2,000.00
<b>Total</b>	<b>9595.00</b>

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

## 8.0 PROJECT MITIGATION PLANS

The following are detailed in Tables 3 and 4 for the potential impacts identified during construction:

- Project action or activity possibly resulting in impacts.
- Environmental and social impacts.
- Mitigation measures are recommended.
- Responsibility for mitigation measures identified, as well as the recommended timing and frequency of such measures.

In Tables 3 and 4, mitigation measures are provided for the design and construction phases, respectively.

## Design Phase Mitigation

The mitigation measures for the impact of the design phase are provided in Table 3 below.

**Table 3: Design Phase Environmental and Social Management Impacts and Mitigation Measures**

## Construction Phase Mitigation

Project Action or Activity	Environmental/ Social Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
1.New designs could affect the aesthetics of the area	Introduction of an office building may detract from the aesthetic of the area.	1.Engage relevant stakeholders in early consultation, for guidance and promote the use of the GRM  2. Present draft designs to relevant stakeholders for their review and feedback before finalisation.  3. Facilitate easy access to up-to-date design information, and feedback mechanisms.	Architect, for engaging stakeholders through the design period as required.  CARDTP PIU for facilitating engagements and feedback from stakeholders.  CARDTP PIU for being responsive in provision of requisite information on design and soliciting feedback from relevant stakeholders.  CARDTP PIU for facilitating stakeholder engagement and communicating with the design team.

The potential direct and indirect, on-site, and off-site environmental and social impacts associated with the project are presented in Table 4 below and include:

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

**Table 4: Construction Phase Environmental and Social Impacts and Mitigation Measures**

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 particularly the foundation.</p>	<p>1.1 If waste is improperly managed, it will create</p> <ul style="list-style-type: none"> <li>• A health and safety hazard, caused by dust affecting the homes and health of nearby residents especially older citizens, young children, and immune comprised individuals.</li> </ul> <p>Increased sedimentation, resulting in the increased silt load of drains resulting in impairment of drainage system function back-up of water and flooding in surrounding</p>	<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"> <li>- 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. This will agree with the PIU, supervision consultants and Grenada SWMA prior to start of construction.</li> <li>- Spoil will be kept separate from other construction waste and reused on site with appropriate sediment control.</li> <li>- Spoil generation will be minimized as Contractor will balance any cut and fill within the site.</li> </ul> <p>2. Solid waste will not be permitted to enter drainage systems and roadways through sieve and other catchment methods</p> <p>3. Provision of adequate non-polluting worksite sanitary facilities including provision of a sufficient number of</p>	<p><b>Design Consultants</b>, for works design and specifications, and identification of possible spoil reuse sites within the worksite (<i>design phase</i>)</p> <p><b>Owners of proposed disposal sites</b>, for approval of site use and guidance on intended after use (<i>prior to bidding</i>)</p> <p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costing (<i>bid preparation</i>)</li> <li>· identification of potential spoil disposal sites and acquiring permits as needed</li> <li>· implementation of recommendations (<i>throughout construction</i>)</li> </ul> <p><b>CARDTP PIU</b>, for approval of appropriate spoil disposal sites proposed by Contractor, after consultation with Solid Waste Management Authority</p> <p><b>Supervision Consultant</b> for monitoring compliance of Contractor during implementation</p> <p>(<i>continuous through construction</i>)</p>

	<p>properties due to decreased run off</p> <ul style="list-style-type: none"> <li>• Soil on the road affecting traffic safety and inconveniencing public users as well as immediate surrounding residents and NADMA workers</li> </ul> <p>Improper garbage disposal by workers flowing into the streets and residents' yards leading to pest infestation</p> <p>Quantities of waste generated are not expected to be large enough to significantly compromise landfill life, but efforts will be made to minimize the quantum of waste disposed at the landfill through sustainable engineering methods</p>	<p>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><b>Solid Waste Management Authority</b>, for monitoring in accordance with their mandate.</p>
<p>2. Drilling and other activities generating noise, vibration, smoke, and dust, such as:</p> <p>(I) equipment and vehicle operation in site</p>	<p><b>2.1</b> Noise and dust affecting:</p> <ul style="list-style-type: none"> <li>· Adjacent properties in particular sensitive receptors, such as the</li> </ul>	<p>1. The contractor to use best practices for the mitigation of noise and dust risk.</p> <p>2. Utilize PPE and include in the <i>Occupational Health and Safety (OHS) Plan</i></p>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costings (<i>bid preparation</i>)</li> </ul>

<p>preparation, fill placement, materials /waste /equipment haulage, etc.,</p> <p>(ii). wind forces on exposed surfaces and aggregate /spoil heaps.</p>	<p>NADMA office,, and residences nearby.</p> <p>· Road and sidewalk users (pedestrian and vehicular) and workers,</p>	<p>3. To minimize the effects on residences restrict use of specified equipment and tools based on noise levels</p> <p>4. Use of noise and vibrating equipment will only be permitted during the hours of 9am to 5pm.</p> <p>5.Any construction work proposed to take place outside of standard construction hours will be subject to a case-by-case approval process and will only be conducted with the knowledge and consent of residents.</p> <p>7. Implement measures to minimize 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).</p> <p>8. Avoid use of vibratory rollers near sensitive areas.</p> <p>9/ Timely maintenance of construction equipment.</p>	<p>· implementation of Recommendations and approved Management Plans (<i>through construction</i>)</p> <p><b>Design Supervisor</b>, for monitoring compliance of Contractor during implementation</p> <p>(Continuous through construction).</p> <p><b>Ministry of Infrastructure, Department of Labour and Environmental Health</b> for monitoring in accordance with their legislation (intermittently through construction, and in investigation of complaints referred to them by CARDTP).</p>
<p>3. Activities causing water pollution, such as:</p> <p>(I) leakage of fuels and oils from equipment</p>	<p>3.1 Water pollution, resulting in:</p> <p>· Health impacts on persons who may meet the water.</p>	<p>1. The contractor will use best practices and take all necessary precautions for protection of the environment; and mitigation of land and water pollution.</p> <p>2. Contractor should be responsible at his own cost for taking immediate</p>	<p><b>Contractor</b>, for:</p> <p>· incorporation of recommendations</p> <p>into work plan and costings (<i>bid preparation</i>)</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 in a built-up area, but these may get into the drains and eventually into the nearest watershed.</p>	<p>-Land and water pollution of residences drains affecting their vegetation, household members and pets.</p>	<p>remedial action and payment of compensation for any environmental damage resulting from his actions.</p> <p>3. Contractor should minimize and carefully control use of chemicals including establishing Datasheets for all chemicals used.</p> <p>5. Contractor should advise of type and quantity of chemicals to be stored on site for construction purposes.</p> <p>6. Temporary storage location of permissible quantities will be approved by the relevant authorities, and appropriate precautions taken. These include:</p> <p>-Construction of a dedicated chemical storage structure to be roofed with a lockable door.</p> <p>-The floor to be equipped with a continuous curb to retain spilled materials.</p> <p>-Chemicals not to be stored near burning material or hot work (welding, grinding) or in shop areas.</p> <p>-Adequate space and shelving to be provided to properly segregate chemicals.</p>	<p>· implementation of recommendations and approved Management Plans (<i>throughout construction</i>)</p> <p><b>Design Supervisor</b>, for monitoring compliance of Contractor during implementation</p> <p>(<i>Continuous throughout construction</i>).</p> <p><b>Solid Waste Management Authority</b>, for monitoring in accordance with their Act</p>
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		<p>-Dry materials to always be placed above liquids, never vice versa.</p> <p>-Liquids not to be stored above eye level.</p> <p>- Storage for PPE to be provided where it is easily accessible in the event of emergency, but not in the chemical storage area.</p> <p>-Appropriate emergency wash area to be provided.</p> <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</p>	
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		<p>trays during on-site refueling 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>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>14. 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. 15. All workers to be required to use these facilities.</p>	
4. Workforce Deployment	4.1 Creation of construction employment opportunities for residents.	<p>1. The contractor should make maximum use of local labour.</p> <p>2. The contractor should maximize use of labor-intensive construction methods rather than mechanization.</p> <p>3. The contractor should maximize participation of local suppliers of materials, services, equipment, and sub-contractors.</p>	The contractor is responsible for employment, as well as the procurement of goods and services.

	<p>4.2 Development of social conflict between the contractor's workforce and the residents and NADMA Staff.</p>	<ol style="list-style-type: none"> <li>1. The contractor should assign responsibility for dealing with complaints from the public to the site foreman, whose name and contact details should be shown on the project signboard.</li> <li>2. A Grievance Redress Mechanism (GRM) will be established for the communities to receive and resolve complaints in a timely manner. Information on the GRM will form part of the information disseminated during consultations.</li> <li>3. The contractor should take appropriate measures to ensure that the site is fenced with a barrier of a minimum five feet in height.</li> <li>4. The contractor should ensure that the site is well secured to protect assets on site.</li> <li>4. Contractor should develop and maintain a code of conduct (CoC) which will be signed by all personnel, including sub-contractors for site activities. The CoC will include provisions related to SEA/SH incidents.</li> <li>5. All the contractor's and sub-contractor's workers will receive sensitization/training on the CoC prior</li> </ol>	<p>The contractor to implement the mitigation measures</p>
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		<p>to commencing working on any project activities. This sensitization should also include information on maintaining positive community relations.</p>	
	<p>4.3 Health and safety hazards to the workforce arising from participating in physical work activities..</p>	<p>1. The Contractor will promote a culture of safety in all activities and ensure the safety of all persons on the site</p> <p>2. The contractor will be guided by the health and safety guideline of the Government of Grenada particularly Occupational Health and Safety Policy, THE Factories Act, Employment Act, and the Accidents and Occupational Diseases (Notification) Act.</p> <p>The Factories Act and the Occupational Health and Safety (OHS) Guidance should be developed as part of this plan and implemented by the contractor.</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>The contractor to implement the mitigation measures</p>

4. The contractor should provide personal protective equipment (PPE) 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 PPE to prevent the spread of Covid 19 and should ensure that employees use the equipment.

5. The contractor should convene regular health and safety meetings with the workforce to reinforce safe work practices and expectations.

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.

7. The contractor should procure the requisite insurances.

		<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> <p>Accidents and incidents will be immediately reported to the PIU</p>	
	<p>4.4 Environmental damage caused by the workforce.</p>	<p>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 issues arising because of his methods of operation, including the following:</p> <ul style="list-style-type: none"> <li>- Train workers in environmental issues and measures to be taken.</li> <li>- Designate an officer to supervise and ensure compliance with environmental obligations.</li> <li>- incorporate environmental and other issues into the agenda of regular meetings with workers.</li> <li>- 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</li> </ul>	<p>The Contractor</p>

		<p>accordance with the instructions of the relevant authorities.</p> <ul style="list-style-type: none"> <li>- 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 behaviors.</li> <li>- Provide and enforce worker use of appropriate, accessible solid waste disposal facilities.</li> </ul>	
<p>5. Excavations resulting in chance finds of physical cultural resources (PCR).</p>	<p>5.1 Damage or loss to cultural heritage due to improper application of Chance Find Procedure</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 consultant team should be informed.</p> <p>2. Follow guidance in the Chance Find Procedures (CFP)- Annex 6.</p>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costings (<i>bid preparation</i>)</li> <li>· implementation of Recommendations and approved Management Plans (<i>through construction</i>)</li> </ul> <p><b>Supervision Consultant</b>, for monitoring compliance of Contractor during implementation (<i>continuous through construction</i>).</p> <p><b>CARDTP PIU</b> for monitoring and referring to relevant agencies.</p> <p><b>Line agencies (National Trust, A &amp; H Society, National Archives)</b> for monitoring in accordance with their legislation or mandate (<i>intermittently through construction, and in investigation and management of chance finds referred to them by CARDTP</i>).</p>

<p>6. Traffic delays and road closures, from:</p> <p>(i) Trucks and transport of other heavy equipment to the construction site slowing down traffic for residents and NADMA Staff</p> <p>(ii) Traffic jams in the main roadway because of the street which is used as a detour being blocked off.</p> <p>(iii) Residents unable to access their homes and driveways due to trucks blocking their entrances and the street in general</p>	<p><b>6.1 Traffic delays and road closures, impacting:</b></p> <ul style="list-style-type: none"> <li>· All road users (vehicular and pedestrian) originating from or traversing through the area</li> <li>· Residents in the streets and NADMA workers and visitors</li> </ul>	<ol style="list-style-type: none"> <li>1. Develop traffic management plan based on the Environmental &amp; Social Best Practices</li> <li>2. Avoid full road closures as much as possible</li> <li>3. Ensure that residents in the area and NADMA workers are informed of the work timings so they can schedule their activities accordingly</li> <li>4. Ensure proper traffic controls are in place in accordance with best practice and the <i>traffic management plan</i> (signage, personnel, and barriers).</li> <li>5. Ensure that worksites are properly signed and cordoned off to always facilitate safe passage of vehicles, including during periods that the site is inactive;</li> <li>6. Ensure that emergency responders are kept abreast of the location of works and implications for traffic.</li> <li>7. Collaborate with the public in a public awareness campaign, including timely Public Service Announcements (this will be part of the broader project communications plan);</li> </ol>	<p><b>CARDTP PIU:</b></p> <p>support in implementation of public awareness campaign (<i>in advance of implementation in affected area</i>).</p> <p><b>Contractor</b>, for: incorporation of Recommendations into work plan and costings (<i>bid preparation</i>)</p> <p>implementation of recommendations and approved Management Plans (<i>through construction</i>)</p> <p><b>Supervisor</b>, for: monitoring compliance of Contractor during implementation (<i>continuous through construction</i>)</p> <p><b>Consultant monitoring</b> compliance of Contractor during implementation (<i>continuous through construction</i>)</p>
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		8. if a road closure is unavoidable, plan this outside of peak traffic times;	
<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>(iii) Working in proximity to road traffic adjacent to the worksite.</p> <p>(iv) Exposure to noise and dust.</p> <p>(vi) Exposure to Covid19 when working in groups.</p>	<p>7.1 <b>OSH impacts</b>, impacting workers health negatively, reduced work output, possible 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>2. Comply with the Occupational Health and Safety (OHS) Guidance of Grenada</p> <p>3. The contractor will adopt and promote a culture of safety on the project sites and be responsible for ensuring that the site is free of potential hazards to human health.</p> <p>5. All works will be carried out in accordance with the approved plans.</p>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costing (<i>bid preparation</i>)</li> <li>· implementation of recommendations and approved Management Plans (<i>throughout construction</i>)</li> </ul> <p>Ensuring that Covid 19 protocols are followed.</p> <p><b>Supervisor</b>, for monitoring compliance of Contractor during implementation (<i>Throughout construction</i>).</p> <p><b>Labour Department, Physical Planning Authority, and Ministry of Infrastructure</b> for routine inspections, handling of complaints referred to them by CRADTP,</p> <p>CARDTP will hand public or workers complaint</p>
<p>8. Community 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>8.1<b>Public Health and Safety concerns</b>, through:</p> <ul style="list-style-type: none"> <li>· reduced air quality in the vicinity of the works, affecting road users and users of adjacent properties</li> <li>· reduced safety of passage near the works for pedestrians and vehicles</li> </ul>	<p>1. Apply the approved Traffic Management Plan.</p> <p>2. Follow the Environmental &amp; 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) Socialize the GRM of the project and the contractor’s GRM among the</p>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costings (<i>bid preparation</i>)</li> <li>· implementation of recommendations and approved Management Plans (<i>continuous through construction</i>)</li> </ul> <p><b>Supervisor</b>, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).</p> <p><b>Ministry of Infrastructure</b>, and for routine inspections, handling of complaints referred to them by CARDTP.</p>



<p>(iii) Harassment and discrimination of workforce and the public (iv) Unfenced site leading to accessibility by minors, pets, and other animals</p>	<p>. The Contractor and Supervisor treating employees differently because of gender, and ability . Contractor employees engaged in harassment of the public, sexual and otherwise. . Harassment among the contractor's personnel.</p>	<p>residents, NADMA workers, contractors' workers, and project workers. GRM will include measures to address SEA/SH. (5) Dissemination and Enforcement of the Code of Conduct. (6) Awareness of the workforce on the Code of Conduct.</p>	<p><b>The contractor and supervisor</b> for ensuring adherence to the Code of Conduct, promoting the GRM among the employees, and ensuring adherence to the Grenada Labour laws. <b>CARDTP</b> for promoting the GRM to the public and referring complaints to the Ministry of Social and Community Development</p>
<p>9. Damage, destruction, and improper handling of cultural heritage</p>	<p>9.1 Damage to landscape, cultural heritage, by improper handling of chance finds.  Chance finds of physical cultural resources are highly unlikely and not considered to be a high-risk during these works.</p>	<p>1.. Mitigation measures during earthworks  2. Chance find procedure (Annex 6) operationalized.</p>	<p><b>Contractor</b>, for:  · incorporation of Recommendations into work plan and costings (<i>bid preparation</i>) implementation of recommendations and approved Management Plans (<i>through construction</i>)  <b>Supervisor</b>, for monitoring compliance of Contractor during implementation  (<i>Continuous through construction</i>).  <b>Grenada National Museum</b>,  For monitoring in accordance with their legislation (<i>intermittently through construction and investigation of complaints referred to them by CARDTP</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 \residents, workers, and members of the public.</p>	<p>1. No stockpiling of materials will be allowed along the roads and accessways.</p> <p>2. Stockpiling of materials on the site would be limited due to the size of the site.</p>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations</li> </ul> <p>into work plan and costing (<i>bid preparation</i>)</p> <ul style="list-style-type: none"> <li>· implementation of recommendations and approved Management Plans</li> </ul> <p>(<i>through construction</i>)</p> <p><b>Supervisor</b>, for monitoring compliance of Contractor during implementation</p> <p>(<i>continuous through construction</i>).</p>
	<p>10.2 Impedance of access to/from residential properties adjacent to the worksite.</p>	<p>1. All operations will be carried out so as not to interfere unnecessarily or improperly with access to and use and occupation of public or private roads, footpaths, and properties.</p> <p>2. Neighboring users will be informed in advance of any activity that has the potential to impede access to their properties or other public spaces.</p> <p>3. Identifying and preparing for the use of alternative access routes by users of the project site.</p>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations</li> </ul> <p>into work plan and costing (<i>bid preparation</i>)</p> <ul style="list-style-type: none"> <li>· implementation of recommendations and approved Management Plans</li> </ul> <p>(<i>through construction</i>)</p> <p><b>Supervisor</b>, for monitoring compliance of Contractor during implementation</p> <p>(<i>continuous through construction</i>).</p>

	<p>10.3 Increased road safety hazards and inconvenience to road users and the public caused by the construction traffic/works interfering with normal traffic flow.</p>	<ol style="list-style-type: none"> <li>1. Contractor should always take care to protect the public and facilitate the uninterrupted flow of traffic during his operation and use of public roads.</li> <li>2. Contractor should erect appropriate (approved) signage on the road to alert other road users to the possibility of slow construction traffic/heavy equipment crossing lanes etc.</li> <li>3. Construction vehicles will be licensed in accordance with Transport Board stipulations.</li> </ol>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costing (<i>bid preparation</i>)</li> <li>· implementation of recommendations and approved Management Plans (<i>through construction</i>)</li> </ul> <p><b>Supervisor</b>, for monitoring compliance of Contractor during implementation</p> <p>(<i>Continuous through construction</i>).</p>
	<p>10.4 Damage to existing road pavements and structures caused by overloaded haulage traffic.</p>	<ol style="list-style-type: none"> <li>1. Contractor should prevent damage to roads or bridges</li> <li>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.</li> <li>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.</li> </ol>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costing (<i>bid preparation</i>)</li> <li>· implementation of recommendations and approved Management Plans (<i>through construction</i>)</li> </ul> <p><b>Supervisor</b>, for monitoring compliance of Contractor during implementation</p>

		<p>3. Contractor should consider location in his selection of suppliers, to minimize 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. 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><i>(Continuous through construction).</i></p>
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		11. Public roads which have material deposited on them because of the contractor's activities will be cleaned and kept free of mud, soil, and other materials.	
	10.5 Competition for scarce potable water resources with existing users.	<p>1. Contractor should conserve water.</p> <p>2. Contractor should have water storage for construction purposes.</p>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costing (<i>bid preparation</i>)</li> <li>· implementation of recommendations and approved Management Plans (<i>through construction</i>)</li> </ul> <p><b>Supervisor</b>, for monitoring compliance of Contractor during implementation <i>(Continuous through construction).</i></p>
	10.6 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.	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costing (<i>bid preparation</i>)</li> <li>· implementation of recommendations and approved Management Plans</li> </ul>

			<p><i>(through construction)</i></p> <p><b>Supervisor</b>, for monitoring compliance of Contractor during implementation</p> <p><i>(Continuous through construction).</i></p>
	<p>10.7 Creation of dust nuisance from construction activities on- and off- site</p>	<p>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 because of his methods of operation.</p> <p>2. Contractor should take appropriate measures to minimize dust generation including regular watering of works sections, aggregate, and soil stockpiles where dust is likely to cause nuisance.</p> <p>3. All material to be stockpiled within the worksite will be kept clean and free of mud, soil, and other materials.</p> <p>4. Access roads will be regularly swept.</p> <p>5. Contractor should minimize quantum of mud and dust tracked onto public roadways from the site.</p>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costing <i>(bid preparation)</i></li> <li>· implementation of recommendations and approved Management Plans</li> </ul> <p><i>(through construction)</i></p> <p><b>Supervisor</b>, for monitoring compliance of Contractor during implementation</p> <p><i>(Continuous through construction).</i></p>

		<p>6. Selection of aggregate sources will minimize haul distances to site, and disruption to other road users.</p> <p>7. All construction waste taken off site and aggregate brought onto the site will be covered by a tarpaulin to minimize dust emissions.</p> <p>8. Contractor should not stockpile material along the public roadway.</p> <p>9. Implementation of the GRM as a complaint and feedback mechanism for PAPs</p>	
	<p>10.8 Creation of noise nuisance and air pollution caused by haulage vehicles/ construction plant and machinery operation.</p>	<p>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 because 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</p>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costing (<i>bid preparation</i>)</li> <li>· implementation of recommendations and approved Management Plans (<i>through construction</i>)</li> </ul> <p><b>Supervisor</b>, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).</p>

		<p>accordance with Labour Department standards for the occupational environment.</p> <p>5. Internal combustion engines will be fitted with silencers.</p> <p>6. Implementation of the GRM and workers GRM as a complaint and feedback mechanism for PAPs and project workers</p> <p>7. Records of complaints will be kept.</p>	
	<p>10.9 Land sterilization/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>	<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 authorities. Any such site shall also be properly cleared and remediated upon works completion.</p>	<p><b>Contractor</b>, for:</p> <ul style="list-style-type: none"> <li>· incorporation of recommendations into work plan and costing (<i>bid preparation</i>)</li> <li>· implementation of recommendations and approved Management Plans (<i>through construction</i>)</li> </ul> <p><b>Supervisor</b>, for monitoring compliance of Contractor during implementation</p> <p>(<i>Continuous through construction</i>).</p>



## Operations Phase Mitigation

The Ministry of ICT is expected to develop a Maintenance Programme, with assistance from relevant government agencies and departments, such as the Ministry of Infrastructure, for routine maintenance of the works. All costs should be integrated into the Ministry's recurrent maintenance costs.

Key impacts and mitigation measures are:

**Table 5: Operational Phase Environmental and Social Impacts and Mitigation Measures**

<b>Impacts</b>	<b>Mitigation Measures</b>
<ul style="list-style-type: none"><li>• Traffic congestion due to increased movement of workers and users of the centre</li></ul>	<ul style="list-style-type: none"><li>• continued implementation of a traffic management system</li></ul>
<ul style="list-style-type: none"><li>• Increased energy use by the centre affects local electricity availability, and the grid</li></ul>	<ul style="list-style-type: none"><li>• the centre will utilize solar electricity as part of its energy source</li></ul>

## 9.0 Training and Environmental and Social Awareness

The Contractor should ensure that all concerned employees know the relevant environmental and social requirements stipulated in local environmental legislation and the Contract specifications. The Contractor is responsible for providing appropriate training to all staff, tailored to suit their level of responsibility for environmental and social matters.

The Contractor should also ensure all site staff know the emergency response procedures. All staff should receive environmental induction training, and managerial staff should receive additional training. Training should also include an 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 for each project activity where possible for easy access during site audits or inquiries. Environmental and social training records (e.g., attendance records for environmental awareness training, topics covered) should be kept.<sup>2</sup>

# Appendix 1 Template for Monitoring the ESMP

Disclosure				
ESMP Monitoring				
Period Covered by Report				
ESS	Describe the progress of implementing the required tools			
Grievance Redress Mechanism				
Stakeholder Engagement Plan				
Information Disclosure				
Environment and Social Impacts	Mitigation Measures	Colour Coding	Describe status of completion. Suggest solutions where problems exist	Early judgement. Is this measure effective
New ESMP Risks				

Coding:

On Schedule/ Ahead of Schedule/Completed	Slightly Delayed	Major Delays Issues
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## Appendix 2 Project GRM

### Grievance Redress Mechanism

To ensure the implementation of the Project in a timely manner and effectively address any anticipated and unanticipated risks that would be encountered during implementation, including the development of the necessary actions of mitigation and avoidance, a Grievance Redressal Mechanism (GRM) was developed. The GRM will enable the Project Authorities to address any grievances against the Project. It must be noted that this GRM covers grievances that relate to the impacts that the project may have on people.

Grievances that relate to project workers will be handled by a separate mechanism, which is included as part of the project's Labour Management Procedures (LMP).

### Objectives of the Grievance Redress Mechanism

The objectives of the Grievance Redress Mechanism are as follows:

1. Ensure that the World Bank Environmental and Social Standards are adhered to in all subprojects and activities;
2. Address any negative environmental and social impacts of all sub-projects and activities;
3. Resolve all grievances emanating from the project activities in a timely manner;
4. Establish relationships of trust between project staff and stakeholders;
5. Create transparency among stakeholders including affected persons through an established communication system;
6. Bolster the relationship trust amongst the project staff and the affected parties.

### Grievance Redressal Process

The key stages involved in the project's grievance redressal process are summarized below and described in the sections that follow.

<b>Level One</b>	<ol style="list-style-type: none"><li>1. Receive grievance</li><li>2. Acknowledge grievance</li><li>3. Register/Log</li><li>4. Screen</li><li>5. Investigate</li><li>6. Resolution</li></ol>
<b>Level Two</b>	Grievance Redress Committee (GRC)
<b>Level Three</b>	Local Courts

## First Level of Redress

### Receive Grievance

All complaints should be received by the Project Manager/ Environmental and Social Specialist of each implementing PIU. This includes the project contact personnel in each of the participating countries. Through the consultation process in each participating country, stakeholders will be formed of various avenues through which the mechanism can be accessed. Complaints can be made in person, writing, verbally over the phone, by fax, emails, or any other media. The point of receipt of complaints is listed below:

Table 0.1- Contact information for persons to receive grievances

<b>Contact</b>	
Name	<a href="#">Finley Jeffrey</a>
Title	<a href="#">Permanent Secretary w.r.f. ICT</a>
Telephone	<a href="#">(473) 440-7952</a>
Email address	<a href="mailto:ps@ict.gov.gd">ps@ict.gov.gd</a>
Physical Address	<a href="#">Ministerial Complex</a> <a href="#">Sir Eric Gairy Gardens</a> <a href="#">St. George</a> <a href="#">Grenada</a>

**All grievances received by the established points of contact within the individual nations should be forwarded to the Project Manager within 24 hours of receipt.**

### Modes of Receiving Grievances

Complaints can be made in person, writing, verbally over the phone, by fax, emails, or any other media. The person receiving the complaint will try to obtain relevant

information regarding the grievance and the complainant and will immediately inform the Project Manager (PM) at each PIU in the format – Grievance Information Form (GIF) as given in Annex 1.

### **Acknowledge Grievance**

All grievances will be acknowledged by telephone or in writing by the PM using the Grievance Acknowledgment Form (Annex2) within 48 hours of receipt and the complainant informed of the approximate timeline for addressing the complaint if it can't be addressed immediately. The PM will work with the Country Ministries or contractors to ensure the speedy resolution of the grievance. If the complaint cannot be resolved at this level it is taken to the next level.

### **Register/Log Grievance**

After receiving and recording the grievance on the GIF, it will be registered in the Grievance Redressal Registration and Monitoring Sheet (GRRMS) (Annex 3).

### **Screen**

The concerned PM reviews the complaint and assign a grievance owner. The complaint will be forwarded to the grievance owner who will be responsible investigating the claim and liaising with both the aggrieved party and project staff to come to a mutually acceptable resolution. The grievant owner will be given a specific timeline for resolving the claim. Meetings with grievant/complainant will be held, if necessary, to resolve the matter.

### **Investigate**

The grievance owner will investigate the complaint. This investigation will include, but is not limited to, meetings with the grievant/complainant, site visits, meetings/interviews with project staff and collection of relevant documentation and other forms of evidence. For meetings, the deliberations and decision will be recorded on the Meeting Record Form included as Annex 4. Community representatives or representatives of the complainant will be allowed to sit in on these meetings.



## **Resolution**

The resolution at the first tier should normally be completed within 15 working days of receipt of grievance and notified to the concerned party through the Disclosure Form (Annex 5). If the grievance is not resolved within this period, it can be referred to the next level of the Grievance Redressal system. However, once it is determined that progress is being made towards a resolution, the grievance will be retained at this first level. The complainant will be informed of this decision and an estimated time for the resolution of the matter will be given either verbally or in writing. If the issue cannot be resolved within 25 working days, it will be transferred to the next level. Once a resolution has been agreed and accepted, the complainant's acceptance will be obtained on the Disclosure Form included as Annex 5. If the proposed resolution is not accepted the grievance will be escalated to level 2.

**NB The complainant may request that the issue be transferred to the next level if he or she does not feel that the grievance is being adequately addressed by the PM.**

## **Second Level of Redress**

A Grievance Redressal Committee (GRC) will be formed in each implementing entity, that will consist of members of their respective Project Steering Committees (Regional project Steering Committee, in the case of OECS), civic leaders and relevant representatives. The GRC will be called into place when a first-tier resolution is not found, but it could also meet on a quarterly basis to evaluate the performance of the project level GRM. From this perspective it is a standing body.

This committee will be chaired by the representative of the implementing line ministry/agency in the corresponding Project Steering Committee. The permanent secretaries of the participant ministries will assign their respective representative to the GRC. The way in which the representative of the civil society will be defined is still TBD, but line ministry or the PIU can invite active NGOs to nominate a representative.

## **Terms of Reference for GRC:**

The functions of the GRC are as follows are to:

1. Provide relief and support to the affected persons in a timely manner;
2. Prioritize grievances and resolve them at the earliest reasonable time;

3. Provide information to PIUs on serious cases at the earliest plausible time;
4. Coordinate the process of the Affected Persons getting proper and timely information on the solution worked out for his/her grievance.
5. Study the normally occurring grievances and advise the PM as to their scale and scope.

The PM will coordinate the convening of the meetings of the GRC. He / She is also responsible for briefing the GRC on the deliberations of the first level of Redressal and on the views of both parties. (Complainant and the Project).

The GRC will hold the necessary meetings with the affected party / complainant and the concerned officers and attempt to find a solution acceptable at all levels. GRC will record the minutes of the meeting in the format using the same format detailed in Annex 4. The decisions of the GRC will be communicated to the complainant formally and if she/he accepts the resolutions, the complainant's acceptance will be obtained on the disclosure format as in Annex 5.

If the complainant does not accept the solution offered by the GRC, then the complaint is passed on to the next level / or the complainant can activate the next level. It is expected that the complaint will be resolved at this level within 35 working days of receipt of the original complaint. However, if both parties agree that meaningful progress is being made to resolve the matter may be retained at this level for a maximum of 60 working days.

### Third Level of Redress

If the affected party / complainant does not agree with the resolution at the 2nd level, or there is a time delay of more than 60 working days in resolving the issue, the complainant can opt to consider taking it to the third level. This level involves the complainant taking legal recourse within the local courts.

## 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

## Annex 1- Grievance Information Form

<b>Date/Time received:</b>	<b>Date: (dd-mm-yyyy)</b>  <b>Time:</b> <input type="checkbox"/> <b>am</b>  <input type="checkbox"/> <b>pm</b>	
<b>Name of Grievant:</b>		<input type="checkbox"/> You can use my name, but do not use it in public.  <input type="checkbox"/> You can use my name when talking about this concern in public.  <input type="checkbox"/> You cannot use my name at all.
<b>Company applicable) (if</b>		<input type="checkbox"/> You can use my company name, but do not use it in public.  <input type="checkbox"/> You can use my company name when talking about this concern in public.  <input type="checkbox"/> You cannot use my company name at all
<b>Contact Information:</b>	<b>Phone:</b>  <b>Email address:</b>  <b>Address:</b>	

	(Kindly indicate the preferred method of communication)
<b>Details of grievance:</b>  (Who, what, when, where)	<input type="checkbox"/> One-time incident/complaint <input type="checkbox"/> Happened more than once (indicate how many times): _____ <input type="checkbox"/> Ongoing (a currently existing problem)
<b>How would you like to see issue resolved?</b>	
<b>Attachments to the grievance/complaint:</b>  (e.g. pictures, reports etc.)	List here:

\_\_\_\_\_

\_\_\_\_\_

**Grievant/Complainant Signature (if applicable)**

**Date (dd-mm-yyyy)**

\_\_\_\_\_

Signature- Project personnel (to confirm receipt only)

Date (dd-mm-yyyy)

**For PIU use only:**

Grievance No: \_\_\_\_\_

**Grievance Category:**

- |   |   |
|---|---|
| <input type="checkbox"/> Problems during material transport | <input type="checkbox"/> Smell                      |
| <input type="checkbox"/> Blocked road access                | <input type="checkbox"/> Problem with project staff |
| <input type="checkbox"/> Dust                               | <input type="checkbox"/> Other (specify): _____     |
| <input type="checkbox"/> Noise                              |   |

Grievance Owner/ Department: \_\_\_\_\_

## Annex 2- Grievance Acknowledgement Form

The project acknowledges receipt of your complaint and will contact you within ten (10) working days.

<b>Date of grievance/complaint:</b>  (dd/mm/yyyy)	
<b>Name of Grievant/Complainant:</b>	
<b>Complainant's Address and Contact Information:</b>	
<b>Summary of Grievance/Complaint:</b>  (Who, what, when, where)	
<b>Name of Project Staff Acknowledging Grievance:</b>	
<b>Signature:</b>	
<b>Date:</b>  (dd/mm/yyyy)	

## Annex 3- Grievance Log

No.	Name of Grievant/Complainant	Date Received	Grievance Description	Name of Grievant Owner	Requires Further Intervention	Action(s) to be taken by PIU	Resolution Accepted or Not Accepted and Date of Acceptance/Non-acceptance
1.							
2.							
3.							
4.							



# Annex 4- Meeting Record Form

Date of the Meeting: ..... Grievance No:  
.....

Venue of meeting:  
.....  
.

Details of Participants:

Complainant	Project/Government/OECS

Summary of Grievance

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.....  
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Meeting Notes:

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.....

**Decisions taken in the meeting / Recommendations of  
GRC.....**

.....  
.....

.....  
.....

.....  
.....

**Issue Resolved / Unresolved: .....**

**Signature of Chairperson of the meeting:**  
.....

**Name of Chairperson: ..... Date**  
**(DD/MM/YYYY): .....**

# Annex 5- Disclosure/Release Form

## *Result of Grievance Redressal*

<b>Grievance No:</b>	
<b>Name of Grievant/Complainant:</b>	
<b>Date of Complaint:</b>	
<b>Summary of Complaint:</b>	
<b>Summary of Resolution:</b>	
<b>Resolved at:</b>	<input type="checkbox"/> First Level <input type="checkbox"/> Second Level <input type="checkbox"/> Third Level
<b>Date of grievance resolution (DD/MM/YYYY):</b>	

**Signature of Complainant in acceptance of the suggested grievance resolution:**

.....

**Name:** .....

ID number: .....

Type of ID:

Date (DD/MM/YYYY): .....

**Signature of Environmental and Social Development Specialist and Project Coordinator:**

1.....

2.....

**1.Name:**.....

**Place:**.....

**Date:(dd -mm - yyyy):** .....

**2.Name:**.....

**Place:**.....

**Date:(dd -mm - yyyy):** .....

## Annex 6 Chance Find Procedure

The project works could impact sites of social, sacred, religious, or heritage value. “Chance finds” procedures would apply when those sites are identified during the design phase or during the actual construction period.

Cultural property includes monuments, structures, works of art, or sites of significant points of view, and are defined as sites and structures having archaeological, historical, architectural, or religious significance, and natural sites with cultural values. This includes cemeteries, graveyards, and graves.

In the event of finding of properties of cultural value during construction, the following procedures for identification, protection from theft, and treatment of discovered artifacts should be followed and included in standard bidding document.

- The Contractor to immediately stop the construction activities in the area of the chance find.
- Contractor to delineate the discovered site or area.
- Contractor to secure the site to prevent any damage or loss of removable objects.
- Contractor to Notify the supervisory Engineer who in turn will notify the responsible local authorities and PIU.
- Responsible local authorities and the relevant Ministry would oversee protecting and preserving the site before deciding on subsequent appropriate procedures.
- Decisions on how to handle the finding shall be taken by the responsible authorities and the relevant Ministry. This could include changes in the layout (such as when finding an irremovable remain of cultural or archeological importance), conservation, restoration, and salvage.
- Implementation of the authority decision concerning the management of the finding shall be communicated in writing by the relevant Ministry of Cultural, Sport and tourist.
- Construction work could resume only after permission is given from the responsible local authorities and the relevant Ministry concerning safeguard of the heritage.
- The World Bank needs to be notified by PIU on the issues and actions taken.
- These procedures must be referred to as standard provisions in construction contracts. During project supervision, the Site Engineer shall monitor the above regulations relating to the treatment of any chance find encountered.

- Relevant findings will be recorded in Progress Reports and the overall effectiveness of the project's cultural property mitigation, management, and activities will be assessed.

# Appendix 7 Sample Code of Conduct

## Workers Code of Conduct

### CODE OF CONDUCT

I [*enter name of Project Worker*] have signed a contract with NABI, for ..... These Works will be carried out at [*enter the Site and other locations where the Works will be carried out*].

This Code of Conduct is part of the measures to deal with environmental and social risks related to the Project.

This Code of Conduct identifies the behaviour that will be required of me.

The workplace is an environment where unsafe, offensive, abusive or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

#### REQUIRED CONDUCT

I shall:

- (a) carry out my duties competently and diligently;
- (b) comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other project Personnel and any other person;
- (c) maintain a safe working environment including by:
  - a) ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
  - b) wearing required personal protective equipment (PPE);
  - c) following applicable emergency operating procedures.
- (d) report work situations that I believe are not safe or healthy and remove myself from a work situation which I reasonably believe presents an imminent and danger to my life or health;
- (e) treat other people with respect and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
- (f) not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature with other Project Workers or Employer's Personnel;
- (g) not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

- (h) not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal coercive conditions;
- (i) not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
- (j) complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
- (k) report violations of this Code of Conduct;
- (l) not retaliate against any person who reports violations of this Code of Conduct, whether to the Employer who makes use of the grievance mechanism for Project Workers.

### **RAISING CONCERNS**

If I observe behaviour that I believe may represent a violation of this Code of Conduct, or that otherwise concerns me, I should raise the issue promptly. This can be done in either of the following ways:

1. Contact

My identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. All reports of possible misconduct will be taken seriously and investigated by the Employer.

There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

### **CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT**

Any violation of this Code of Conduct may result in serious consequences, up to and including termination and possible referral to legal authorities.

#### **FOR EMPLOYEE/CONTRACTED WORKER:**

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact *[enter name of Employer's contact person(s) with relevant experience (including for sexual exploitation, abuse and harassment cases) in handling those types of cases]* requesting an explanation.



Name of Employee/Contracted Worker: *[insert name]*

Signature: \_\_\_\_\_

Date (day/month/year/):

\_\_\_\_\_

Countersignature of authorized representative of the Employer:

Signature:

\_\_\_\_\_

Date (day/month/year/):

\_\_\_\_\_