

BARBADOS

**Ministry of Environment and National
Beautification, Green and Blue Economy
(MENB)**

**Barbados – Beryl Emergency Response and
Recovery Project
(P507190)**

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

Appraisal

September 8, 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Barbados (the Borrower) will implement the Barbados – Beryl Emergency Response and Recovery Project (the Project), with the involvement of the Ministry of Environment and National Beautification, Green and Blue Economy (MENB) and the assistance of Barbados Port Inc. (BPI), as set out in the Loan Agreement (the Agreement). The International Bank for Reconstruction and Development (the Bank) has agreed to provide financing for the Project, as set out in Agreement.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring, and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed, and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower's Representative specified in the Agreement or the Director of the Ministry of Finance, Economic Affairs, and Investment. The Borrower shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT¹			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. Establish and maintain a Project Executing and Coordinating Unit (PECU) with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including at least an environmental specialist and a social specialist. The responsibilities and qualifications of the E&S specialist will be detailed in the respective Terms of Reference, which will be included in the Project Operations Manual.</p> <p>b. Enter into arrangements with other entities or agencies with which the PECU needs to engage to manage E&S risks and impacts of the Project.</p>	<p>a. Establish a PECU and hire or appoint the environmental and social specialists, no later than three (3) months after the Project Effective Date, before the start of work, whichever comes first. Thereafter maintain the PECU and these positions throughout Project implementation.</p> <p>b. Before entities/ agencies begin implementing Project work.</p>	MENB/PECU
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>a. Prepare and implement training for PECU staff, Contractors, Relevant Government Agencies on the E&S Project requirements, and on other training and capacity development events as the need arises.</p> <p>b. Training on Environmental, Social and Health and Safety (ESHS) matters, including (i) <i>Environment, Social and Health and Safety considerations in Design</i>, (ii) <i>Integrating ESHS into Procurement Process</i> and (iii) <i>Contract Management for ESHS Performance</i>.</p> <p>c. As relevant, prepare and implement training for the FI and subprojects FI.</p>	<p>a. Training program to commence within six (6) months of the Project Effective Date. Throughout Project implementation.</p> <p>b. Prior to finalization of first (i) Design TOR, (ii) Bidding Documents for Works and (iii) Start of Works Contract.</p> <p>c. Prior to engaging with FI subprojects, and thereafter throughout FI and FI subprojects implementation</p>	MENB/PECU/FI
MONITORING AND REPORTING			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. • Other aspects that may arise as relevant. 	<p>Semestral (every six months) reports to the Bank throughout Project implementation, commencing after the Project's Effective Date. Submit each report to the Bank no later than forty-five (45) days after the end of each reporting period.</p>	MENB/PECU
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.</p>	<p>Submit the monthly reports to the Bank upon request.</p>	MENB/PECU
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets</p>	<p>Notify the Bank no later than forty-eight (48) hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Bank no later than ten (10) days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	MENB/PECU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	out the measures and actions to be taken to address the incident or accident and prevent its recurrence.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>1. Prepare and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for subcomponents 1.2 and 1.3 of the Project, consistent with the relevant ESSs. The risks associated with Component 1.1 (i) assistance for repair or replacement of vessels, will be managed through the Environmental and Social requirements outlined in the respective bidding documents, which will be incorporated into the contracts for repair or procurement of vessels.</p> <p>2. Require other entities that will implement Project activities to prepare ESMPs and to prepare and implement site specific Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP). The proposed activities described in the exclusion list set out in the Project's Operations Manual (POM) shall be ineligible to receive financing under the Project.</p>	<p>1. Prepare the ESIA and ESMP prior to the launching of the respective bidding documents, and thereafter implement the ESIA and ESMP throughout Project implementation.</p> <p>2. Prepare the ESMP and incorporate the ESMP as part of the respective bidding documents for the respective Project activity, prior to the carrying out of Project activity that requires the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project implementation.</p>	MENB/PECU/BPI
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i>, the Stakeholder Engagement Plan requirements, the Labor Management Procedures, and code of conduct, Traffic and Road Safety, Chance Finds, Universal Access, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Bank upon request.</p>	MENB/PECU/BPI
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Under components 1 and 2 of the Project carry out the consultancies, studies, including feasibility studies, for the Port and Fisheries Infrastructure Resilience; capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference</p>	<p>Throughout Project implementation.</p>	MENB/PECU/BPI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	acceptable to the Bank, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.		
1.4	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>a) Ensure that the CERC Manual and Emergency Action Plan include a description of the E&S assessment and management arrangements, including the CERC-ESMF Addendum that will be included or referred to in the CERC Manual for the implementation of the CERC Part of the Project in accordance with the ESSs.</p> <p>b) Adopt any E&S instruments which may be required for activities under the CERC component of the Project, in accordance with the CERC Annex and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>a) The preparation of the CERC Annex [and Emergency Action Plan] in form and substance acceptable to the Bank is a withdrawal condition under Section III(B)(d) of Schedule 2 to of XXX the Loan Agreement.</p> <p>b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.</p>	Borrower
1.5	<p>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</p> <p>Consistent with the Terms of Reference (ToR) for the environmental and social risk evaluation/audit related to retroactive financing; evaluate and ensure that activities under components 1 &2 of the Project, financed retroactively, comply with the requirements of the ESCP and other relevant E&S instruments. If necessary, conduct an amendment to existing work contracts, or a corrective action plan.</p>	Respective due diligence shall be completed within a timeframe acceptable to the Bank, and before a decision on retroactive financing is made.	MENB/PECU/BPI
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p>	Prepare the LMP no later than thirty (30) days after the Project Effective Date, or prior to the start of work, whichever comes first, and thereafter implement the LMP throughout Project implementation.	MENB/PECU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Prepare and implement a Labor Management Procedures (LMP) for the Project. The LMP will describe: the types of workers to be employed; the regulatory requirements that will govern the employment of workers, and any additional measures to ensure compliance with ESS2; the contractual arrangements (including details of their terms and conditions, pay, hours of work, holiday and other entitlements) that will apply; the approach for recruiting workers (reflecting requirements for non-discrimination, equal opportunity and avoidance of forced and child labour) and managing labour influx; a mechanism for raising grievances; and procedures on how to address GBV related grievances. The LMP will include the applicable Code of Conduct, as found in the World Bank's Standard Procurement Documents for Works.</p> <p>The LMP will be reviewed and updated throughout project implementation as required, considering the activities to be undertaken in each site-specific Project activities and as additional project activities unfold entailing additional labor related risks or issues.</p>		
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Require contractors and subcontractors to prepare and implement OHS Management Measures as part of their respective ESMPs in accordance with the ESF and Occupational health and safety guidelines (manual) of the World Bank.</p>	Include the OHS Management measures in ESMPs prior to the launching of bidding documents, and thereafter implement the plan throughout Project implementation.	MENB/PECU
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MENB/PECU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>As part of the ESMPs, describe the process and measures for identifying and characterizing wastes encountered, their management and subsequent disposal in accordance with ESS3 during:</p> <ol style="list-style-type: none"> Debris clearance and provide to the Bank as part of action 1.5 above (Activities Subject to Retroactive Financing) The implementation of Components 1 and 2 of the Project. <p>The ESMPs will include guidelines for contractors and subcontractors to prevent uncontrolled waste disposal and ensure that all waste disposal occurs only at licensed sites.</p>	Same timeframe as for actions 1.1 the preparation and implementation of the ESMP.	MENB/PECU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.	Same timeframe as for actions 1.1 the preparation and implementation of the ESMP.	MENB/PECU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.	Same timeframe as for actions 1.1 the preparation and implementation of the ESMP.	MENB/PECU
4.2	COMMUNITY HEALTH AND SAFETY Ensure that Barbados Building Inspectors working with the Project's Supervising Consultants verify that construction has been undertaken in accordance with Building Codes. The ESMPs will include measures to ensure proper management and safety of hazardous materials in alignment with ESS4.	Same timeframe as for actions 1.1 the preparation and implementation of the ESMPs.	MENB/PECU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Adopt and implement biodiversity management measures as part of the ESMPs to be prepared under action 1.1 above. For related activities, the Project will implement environmentally friendly technology and using Good International Industry Practice.	Same timeframe as for actions 1.1 the preparation and implementation of the ESMPs.	MENB/PECU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES: Currently not relevant			
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS Describe and implement the chance finds procedures, as part of the ESMPs of the Project.	Describe the chance find procedures in the ESMPs. Implement the procedures throughout Project implementation.	MENB/PECU
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	a) Develop, maintain, and implement an Environmental and Social Management System (ESMS) -to identify, assess, manage, and monitor the environmental and social risks and impacts of FI subprojects that receive support from the Project. The ESMS shall include labor management requirements under ESS2, and, inter alia, the following elements: <ul style="list-style-type: none"> • Identification of the FI subprojects that may receive support from the Project. 	Prior to engaging FI and Implement the ESMS throughout Project implementation.	MENB/PECU/FI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> • An environmental and social policy endorsed by the FI (TBD) senior management. • Clearly defined procedures for the identification, assessment and management of the environmental and social risks and impacts of FI subprojects, including, inter alia, stakeholder engagement and disclosure requirements applicable to FI subprojects. • Exclusion list with the activities that are not eligible for financing by FI Subprojects. • An organizational capacity and competency for implementing the ESMS with clearly defined roles and responsibilities as set out in actions (d) and (e) below. • Monitoring and reporting of environmental and performance of FI subprojects and the effectiveness of the ESMS. • Incidents and accidents notification and subsequent reporting requirements. • An external communications mechanism, including measures to respond to public enquiries and concerns in a timely manner. <p>b) Disclose a summary of each of the elements of the ESMS through the FI (TBD) website, including the exclusion list.</p> <p>c) Screen all proposed activities for FI subprojects, against the exclusion list set out in the Project Operations Manuals.</p> <p>d) Establish and maintain an organizational capacity and competency for implementing the ESMS with clearly defined roles and responsibilities for E&S management and as part of the organizational structure.</p> <p>e) Designate a senior management representative to have overall accountability for environmental and social performance of the FI subprojects that receive support from the Project.</p>		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN		
	<p>a) Update and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, <i>inter alia</i>, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	<p>a) Update the SEP no later than sixty (60) days after Project Effective Date, and thereafter implement the SEP throughout Project implementation.</p>	MENB/PECU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	b) Report on Stakeholder Engagement Indicators as defined in annex 4 of the SEP.	b) Yearly reporting after year two (2) of the Project as indicated in the timeframe of annex 4 of the SEP.	
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Establish the grievance mechanism within the same timeframe of action 10.1 above, and thereafter maintain and operate the mechanism throughout Project implementation.	MENB
<p>INDICATORS FOR IMPLEMENTATION READINESS</p> <p>The following actions are indicators for implementation readiness:</p> <p>1.5 Terms of Reference (ToR) for the environmental and social risk evaluation/audit related to retroactive financing.</p> <p>2.1 Approved Labor Management Procedure (LMP)</p> <p>10.1 Approved Stakeholder Engagement Plan (SEP)</p> <p>1.1 Approved Environmental and Social Impact Assessment and Environmental and Social Management Plans (before the start of works)</p>			