



**ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN
FOR
REDEVELOPMENT OF DEREK WALCOTT SQUARE**

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ACRONYMS AND ABBREVIATIONS

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

1.0 INTRODUCTION

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

In keeping with this intention, the GoSL has prioritized the Derek Walcott Square as a pull factor with tremendous potential to increase the number of visitors in the Castries City Centre. Notwithstanding its potential, the GoSL has recognized that in order to fully leverage the opportunities for increased visitation by both locals and visitors, the Square would require some enhancement in order to make it more aesthetically appealing. This initiative is in keeping with the recommendation proposed in the Castries 2030 Vision Plan for the “Re-Landscaping of the Derek Walcott Square” (page 89).

The Castries Vision 2030 document conceptualized by The National Integrated Planning and Programme Unit (NIPP) in collaboration with the United Nations Office for Project Services identifies several priority project interventions which were guided by the overarching vision of “Making Saint Lucia’s Capital a Vibrant, Resilient and Smart Heritage City for Residents and Visitors”.

Emanating from these priority project interventions was a key "quick win" project which involves the relandscaping of the Derek Walcott Square. Following several consultations with the Office of the Prime Minister, a directive was given to implement this project which will be undertaken in two phases with the first phase of this project tentatively scheduled to commence in September 2020.

The Redevelopment of the Derek Walcott Square which fits under the Broad Activity: *Improving the Visitor Experience Walking Through Downtown Castries*. This redevelopment project to enhance the existing square which is situated at the centre of the city has been conceptualized in two phases, however, only the first phase will be initially executed under the ORTCP. More specifically the works constituting Phase One will include:

- Demolition of perimeter walls and planters,
- Excavation works
- Minor Concrete works
- Metal works
- Minor landscaping and beautification works;
- Placement of pavers to improve sidewalks; and
- Maintaining existing parking spaces

The first approach will be the preparation of all technical documents, obtaining approvals and engaging all the necessary stakeholders to inform and seek recommendations regarding the execution of the project. The general public will be sensitized prior to the commencement of the project. The site works for the upgrade of the square will commence by first hoarding off one section of the square and using the appropriate signage to safeguard pedestrians and motorist. The space will be divided into eight (8) main sections and that all works should be completed before moving to the subsequent section.

The major demolition work will first commence with the perimeter walls and then the removal of all planters. All waste from each section will be hauled to a site recommended by the Solid Waste Management Authority. Following the demolition works, the site will be levelled off for the placement of pavers with grass subsequently utilized to improve the greenery.

Phase two of the project comprises a total remodeling and redesigning phase of the Square. All existing features such as the water fountain, gazebo, Obelisk, bust and also importantly the cluster of huge trees on its perimeter of the square should remain.

The following specific activities will be implemented under phase two:

- Monuments placed at key locations allowing for an obstructed viewing

- Allowance made for seating and vending in diverse modes within the space
- Creation of clear green space to facilitate performances and picnics
- Relocation of the existing fountain to relate to the library and allow free central space
- Walcott's monument strategically located to greet visitors from the city

While the works will be implemented in a phased approach, each phase is a stand-alone project, phase one will lay the ground work and phase two will focus on further enhancing the works from phase one. More specifically phase two will adopt the Madras (a patterned fabric which is a major theme in St. Lucia's heritage and culture) as a design generator, to give meaning, character and establish the poetics of the space. The design will highlight the green spaces which will contrast the rigid lines of the madras thereby reinforcing the island's English and French heritage.

2.0 PROJECT SITE

The Derek Walcott Square is located in the heart of the Castries Business District. First called Place D'Armes in the 1760's, it has also been known as Pomenade Square and Columbus Square. In 1993, it was renamed after Nobel Laureate, Sir Derek Alton Walcott who received the 1992 Nobel Prize in Literature. Busts of both of St. Lucia's Nobel Laureates, Sir Derek Walcott and Sir Arthur Lewis are erected at The Square.

The Derek Walcott Square is a public square situated on two acres of land and bounded by Bourbon, Brazil, Laborie and Micoud Street. The Square is strategically situated in the heart of St. Lucia's capital city, Castries. Colonial buildings line the surrounding streets, making it one of the city's most picturesque places as well as being an important cultural and historical center.

The most prominent feature of the Derek Walcott Square is the gigantic Saman Tree which is over 425 years old. The landmark Cathedral of the Immaculate Conception is located directly east of the Square and the Castries Central Library, a quaint historical building is located to the west. Several businesses and offices, many which occupy colonial buildings are also located in the periphery of the Square, making it one of the city's most picturesque places as well as being an important cultural and historical center.

Because of its size and central location, the Square is intricately involved in the social and recreational life of the city, as it has served as the location for traditional activities such as the annual New Years "Assou Square" fair, and *Jazz on the Square* as part of the St. Lucia Jazz Festival, as well as the Festival of Lights as part of National Day activities in December. The Square is also a preferred location for school activities such as science fairs and exhibitions. Due to its historical importance and central location, enhancement works at the Square would not only contribute to enhancing the aesthetics for Tourism purposes, but would also foster a greater sense of pride and ownership of the Park.

DEREK WALCOTT SQUARE UPGRADE

CONTEXT



DEREK WALCOTT SQUARE UPGRADE

CONTEXT1



Images of Redeveloped Derek Walcott Square



DEREK WALCOTT SQUARE UPGRADE – PHASE 2



3.0 THE LEGAL AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL MANAGEMENT

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

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

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

Table 1. Agencies with Environmental Management Responsibilities

Agency	Responsibility	Legislation
Department of Physical Planning	This Ministry has responsibility through the functions of its various departments/ sections which impact directly on the management of the country's natural resources. As such it has the authority to request an Environmental Assessment for any developmental activity. The Ministry is also responsible for the implementation of the Saint Lucia Building Codes and guidelines which are supposed to provide guides for best construction practices.	The Physical Planning and Development Act No 21 of 2001
Development Control Authority (DCA)	The DCA is made up of a government appointed Board of various professional interest and main technical government offices which also includes the Chief Engineer of the Ministry of Infrastructure or his representative. The Board of the DCA has the power to review and decide on development proposals that are brought to it by its technical secretariat, the Physical Section of the Ministry of Physical Development. The relevant Act provides the legislated authority to make provision for the development of land, the assessment of the environmental impacts of development, the grant of permission to develop land and for other powers to regulate the use of land, and for related matters. The final decision on an EIA is made by the Board of the Development Control Authority (DCA) who may approve the EIA with its recommendations and measures, along with the recommendations and measures of the referral agencies.	The Physical Planning and Development Act No 21 of 2001 (amended 2005) which superseded the 1971 Land Interim Development Control Act. Amendments to the 1971 Land Interim Development Control Act

<p>Ministry of Health, Wellness, Human Services, and Gender Relations</p>	<p>Through its Environmental Health Department, it has the responsibility for reviewing plans, monitoring and enforcing public health and sanitation regulations and practices, and promoting public awareness on matters relating to public health and the environment. These include practices that affect health such as food preparation, sanitation, solid waste management, liquid and solid waste disposal, dust and air pollution, water quality, some occupational health and safety matters.</p>	<p>Public Health Act of 1975 and attendant Regulations to present.</p> <p>No. 10, 11, 12, 13, 14, 15, 16, 18, 20, 21, and 22 of 1978]:Public Health [Nuisances] Regulations.</p> <p>Public Health [Offensive Trades] Regulations:</p> <p>Public Health [Communicable and Notifiable Disease] Regulations:</p> <p>Public Health [Water Quality Control] Regulations:</p> <p>Public Health [Apartment Houses, Guest Houses and Hotels] Regulations:</p> <p>Public Health [Swimming Pools] Regulations:</p> <p>Public Health [Disposal of Offensive Matter] Regulations:</p> <p>Public Health [Sewage and Disposal of Sewage and Liquid Industrial Waste Works] Regulations</p>
<p>Pesticides Control Board (in the Ministry of Agriculture)</p>	<p>Pesticides Control Board in the Ministry of Agriculture and is responsible for monitoring the importation and use of various chemical substances.</p>	<p>The Pesticides and Toxic Chemicals Control Act 1975</p>
<p>Saint Lucia Solid Waste Management Authority</p>	<p>A statutory authority with the responsibility for providing a coordinated and integrated systematic approach to collection, treatment, disposal, and recycling of wastes including hazardous wastes. The Authority is also responsible for the management of two sanitary disposal sites, one in the north at Deglos, and the other in the south in Vieux Fort.</p>	<p>The Saint Lucia Solid Waste Management Authority Act No 8 of 2004, Amendment of No 10 of 2007</p>
<p>Saint Lucia National Trust</p>	<p>The Trust is a statutory body established in 1975 and has responsibility for the conservation and management of buildings and objects of historical and architectural value as well as areas of natural and scientific importance. Because it is charged with protecting and promoting natural and cultural heritage it manages sites such as the</p>	<p>The Saint Lucia National Trust Act of 1975</p>

	<p>historical Pigeon Island National Landmark and the Maria Islands Nature Reserve. The Trust has developed the System Plan for Saint Lucia, and is also trying to document and preserve the Architectural Heritage of Saint Lucia. While the Trust is a referral agency for the DCA, it is also very vocal on matters where it believes the matter of national heritage or preservation is threatened.</p>	
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As per World Bank Safeguards Policies, the ORTCP is classified as category B, meaning that any negative environmental impacts are site specific, few if any of them are irreversible and in most cases mitigation measures can be designed more readily than for projects with major adverse negative impacts. The Following Safeguard Policies have been triggered under this project activity:

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

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

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

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

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

4.0 PURPOSE OF THE ESMP

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

Efficient implementation of the recommended mitigation measures is necessary to avoid, minimise or offset adverse impacts and to promote beneficial impacts, resulting in an enhancement of the overall environmental performance of this activity. Effective environmental and social management can only be

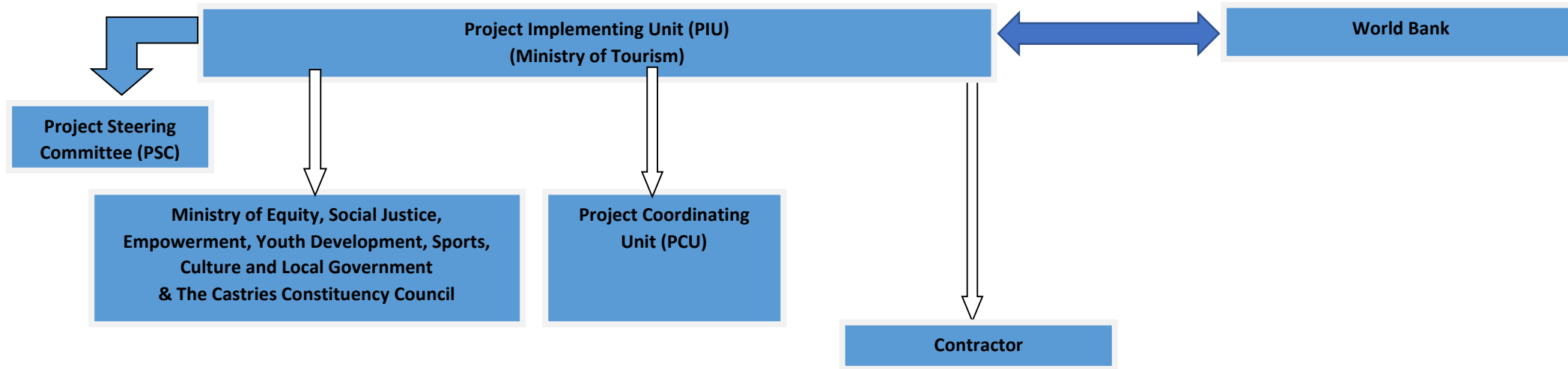
achieved if it is carried out within a formalised framework based on some fundamental general principles. These include

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

5.0 ORGANISATIONAL ASPECTS

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

Figure 1. INSTITUTIONAL ARRANGEMENT FOR E & S MANAGEMENT



5.1 Roles and Responsibilities

The World Bank

- Responsible for funding and implementation oversight.

Ministry of Tourism (M oT) / Project Implementation Unit (PIU)

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

Project Coordinating Unit (PCU)

- Coordination of the Fiduciary Aspects of Project Implementation.

Project Steering Committee (PSC)

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

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

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

The Contractor

- Responsible for implementing measures to address all the social and environmental safeguard requirements.
- Responsible for developing site specific plans as needed such as Traffic management plan, workers codes of conduct
- Responsible for developing COVID-19 protocols for workers and site management
- Comply with national regulations such as Waste Management Act of 2004, the Litter Act of 1983 and its amendments (1985 and 1993), and the Public Health Act of 1975.

- Hiring professionals with the appropriate project management and other specialist skills required for the successful implementation of these requirements. These include the Site Supervisor, Occupational Health and Safety Officer and the Environmental Monitoring Officer.
- Developing a Grievance Redress Mechanism for workers and addressing project grievances.

5.2 The ORTCP and Line Agencies

The ORTCP PIU will have responsibility for all social and environmental safeguards management. Other Agencies, Ministries and Departments (e.g. CCC), Environmental Health Department (EHD), Ministry of Infrastructure (MOI), Physical Planning Department (PPD), Labour Department, Public Utilities Department) will have responsibility for monitoring based on their mandate and the day-to-day responsibilities of their respective institutions. As such, environmental management and monitoring of this project by the public sector will involve several bodies, each with its own statutory responsibilities or other traditional roles, and organisational structure. These bodies should work cooperatively, within a coordinated framework, if efficient and effective environmental management from the public sector perspective is to be achieved. The ORTCP PSC also has project implementation oversight. Although all of the following agencies are not represented, their participation should be co-opted as required to ensure improved coordination of public responsibilities in relation to environmental management and monitoring on this project:

1. Ministry of Infrastructure
2. Department of Forestry
3. Transport Board
4. Police – Traffic Department
5. Labour Department
6. Environmental Health Department
7. Fire Service
8. WASCO
9. LUCELEC
10. FLOW
11. St. Lucia National Trust

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

6.0 PROJECT PHASES AND ENVIRONMENTAL AND SOCIAL MANAGEMENT

6.1 Pre-Construction Phase Environmental and Social Management Activities and Responsibilities

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

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

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

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

6.2 Construction Phase Environmental Management Activities and Responsibilities

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

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

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

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

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

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

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

If time permits, these submissions should be reviewed by the relevant authorities, 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, but PIU may also consult 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.

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.

6.3 Operations Phase Activities and Responsibilities

This phase commences when construction is finalized, at which point the CCC is expected to assume responsibility for management of the Square. However, the CCC can seek the assistance of the Ministry of Infrastructure in developing a maintenance plan to address operations phase requirements from inception, to guide the CCC inspection and maintenance protocols. Responsibility for routine cleaning will continue with CCC upon completion of construction.

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

7.0 ENVIRONMENTAL AND SOCIAL MONITORING AND REPORTING

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

There are two basic forms of environmental monitoring:

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

Compliance monitoring is usually given more emphasis in building construction projects because the majority of impact controls take the form of environmental protection measures incorporated in the design and contract documents, and the extent to which these are complied with by the contractor(s) plays a major part in determining the overall environmental performance of the project. Compliance monitoring affords the

opportunity for a rapid response to construction impacts. There will be no effects monitoring recommended for this project.

7.1. Day-To-Day Monitoring and Reporting

Day-to-day environmental monitoring will be undertaken by a suitably qualified member of the Supervising Consultant's staff specifically assigned as Environmental Compliance Monitoring Officer to undertake systematic observation of all site activities. This person may have other responsibilities, as long as s/he is able to properly meet the environmental monitoring requirements.

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

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

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

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

7.2 Monitoring by ORTCP and Line Agencies

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

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

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

7.3 Progress Meetings and Monthly Reports

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

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

8. COSTS ASSOCIATED WITH ENVIRONMENTAL MANAGEMENT ACTION PLAN IMPLEMENTATION

Costs to the contractors in complying with environmental protection clauses in the contract, including approved environmental plans, will be incorporated in unit rates and bill items, and will thus be included in the bid prices. Generally, compliance with environmental protection clauses requires the contractors to behave in a responsible manner in relation to the environment, in accordance with good international construction practice. Environmental management and monitoring carried out should be an integral part of construction supervision duties and will be covered by the construction supervision budget.

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

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

Table 2 EMP Implementation Costs incurred by Contractors

EMP Activity incurring cost	Estimated cost (US\$)
Signage for vehicular and pedestrian traffic management	1,500
Traffic safety provisions (barriers, cones, lighting, etc.)	1,000
Public announcements and communications with stakeholders	1,000
Total	3, 500

An Environmental Compliance Monitoring Officer is expected to be part of the Supervisor’s team, and it assumed that 50% of the individuals’ time will be dedicated to this role. Associated costs are estimated in Table 3.

Table 3. EMP Implementation Costs incurred by Supervisor

EMP Activity incurring cost	Estimated cost (US\$)
Part time Environmental Compliance Monitoring Officer, including overtime	900/month
Total	900/month

Costs of the recommended PMC operation are expected to be met by ongoing agency recurrent costs and ORTCP implementation costs and are not estimated here.

9. PROJECT MITIGATION PLANS

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

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

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

9.1 Design Phase Mitigation

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

Table 4 - Design Phase Environmental and Social Management

Project Action or Activity	Environmental Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
1.New designs could affect the aesthetics of the area	Introduction of new trees and objects could obstruct the view from existing buildings and streets.	<ol style="list-style-type: none"> 1.Engage relevant stakeholders in early consultation, for guidance and promote the use of the GRM 2. Present draft designs to stakeholders for their review and feedback before finalisation. 3. Facilitate easy access to up-to-date design information, and feedback mechanisms. 	<p>Designer, for engaging stakeholders through the design period as required.</p> <p>ORTCP and Ministry of Equity for facilitating engagements and feedback from stakeholders.</p> <p>CCC, and Ministry of Infrastructure,</p> <p>For being responsive in provision of requisite information and feedback.</p>
2. Plans for landscaping, greening of the site and water features	Competition for scarce water resources for landscape irrigation and fountain operation.	<ol style="list-style-type: none"> 1. The landscaping should be designed to minimise irrigation requirements, and should only be irrigated where and when necessary. 2. Drought-resistant native or other well adapted non-invasive plants should be used where possible in the landscaping design. 3. If possible the design should maximise capture of rain water and storm runoff, with the intention to meet irrigation water requirements from these sources under normal conditions. 4. The water for fountain operations should be recycled. 	<p>Designer for ensuring that the designs incorporate features that would maximise the use of rainwater harvesting.</p> <p>CCC, and Ministry of Infrastructure, Department of Forestry</p> <p>For being responsive in provision of requisite information and feedback.</p>

9.2 Construction Phase Mitigation

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

(a) Anticipated impacts during construction; and

(b) Recommendations to mitigate these impacts and enhancement measures, where applicable

Table 5. Construction Phase Environmental and Social Management

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
1. Activities generating waste such as site clearance and earthworks.	<p>1.1 If waste is improperly managed, it will create</p> <ul style="list-style-type: none"> • A health and safety hazard to stakeholders who continue to use adjacent spaces • Dust impacting adjacent properties and road users, • Increases in the silt load of drains resulting in impairment of drainage system function and adverse effects on marine life, and water quality. • Mud on roadways affecting traffic safety and inconveniencing users. • Land and water pollution, public health hazards, landscape degradation and reduction in amenity value, arising from inappropriate/ inadequate solid waste disposal practices. 	<ol style="list-style-type: none"> 1. The contractor should take all reasonable steps to minimize erosion. 2. Cleared areas should be vegetated as quickly as possible, using appropriate local species. 3. The contractor should develop an erosion control plan and the approved plan will be implemented before site earthworks commence. It will include use of vegetated swales to slow and infiltrate water and trap pollutants in soil where they can be naturally destroyed. 4. Ponding of water that may encourage mosquito breeding will be avoided. 5. Minimise quantum of waste material generated through careful planning of the works. 6. Directly connected impervious areas will be eliminated or minimised. 7. Use of pervious pavements should be maximised. Pervious paving would decrease storm water runoff and reduce nonpoint source pollution. 8. High permeability concrete will be used for pathways. 	<p>Designers, for works design and specifications, and identification of possible spoil reuse sites within the worksite (<i>design phase</i>)</p> <p>Owners of proposed disposal sites, for approval of site use and guidance on intended after use (<i>prior to bidding</i>)</p> <p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · identification of potential spoil disposal sites · implementation of recommendations (<i>throughout construction</i>) <p>ORTCP, for approval of appropriate spoil disposal sites proposed by Contractor, after consultation with Environmental Health and Solid Waste Management Authority</p> <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>continuous through construction</i>)</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
	<p>Quantities of waste generated are not expected to be large enough to significantly compromise landfill life, but efforts should be made to minimize the quantum of waste disposed at the landfill.</p>	<p>9. Use of natural systems to treat storm water runoff will be maximised.</p> <p>10. Solid waste will not be permitted to enter drainage systems.</p> <p>11. Requirements for provision of adequate non-polluting worksite sanitary facilities including provision of a sufficient number of adequate waste receptacles across the site (including appropriate and accessible containment for worker food waste) and regular collection services provided by a licensed collector.</p> <p>12. If contractor is hauling site-generated waste, legal requirements for proper containment of the waste will be observed, and disposal will be at an approved location. (A copy of the St. Lucia Solid Waste Management Authority Guidelines for the Submission of Waste Management Plans for Development is found in Appendix III)</p> <p>13. Spoil will be kept separate from other construction waste and reused on site with appropriate sediment control.</p> <p>14. Spoil generation will be minimised as Contractor will balance any cut and fill within the site.</p>	<p>Environmental Health and Solid Waste Management Authority, for monitoring in accordance with their mandate (<i>intermittently Through construction, and in investigation of complaints referred to them by ORTCP</i>).</p> <p>CCC, for timely removal of items that may be redeployed in other locations.</p>
<p>2. Activities generating noise, vibration, smoke and dust, such as: (I) equipment and vehicle operation in demolition of existing structures, fill placement, materials /waste /equipment haulage, etc.,</p>	<p>2.1 Noise and dust affecting:</p> <ul style="list-style-type: none"> · Adjacent properties in particular sensitive receptors such as churches, government offices and businesses. · Road and side walk users (pedestrian and vehicular) workers, and vendors. 	<ol style="list-style-type: none"> 1. The contractor to use best practices for the mitigation of noise and dust risk. 2. Utilize PPE and include in the <i>Occupational Health and Safety (OHS) Plan</i> 3. To minimize the effects on institutions and other nearby businesses restrict use of specified equipment and tools based on noise levels. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costings (<i>bid preparation</i>) · implementation of Recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
<p>(ii). wind forces on exposed surfaces and aggregate /spoil Heaps.</p> <p>(iii) burning on site</p>	<p>-Smoke and odour nuisance arising from on-site burning of construction waste.</p> <p>-Fire damage to surrounding properties.</p>	<p>4. There will be no burning of waste on site. All waste will be disposed at the SLSWMA landfill site at Deglos.</p> <p>5. Effective measures will be taken to minimise nuisance when working close to the nearby roadway or the sea, including use of methods which minimise dust generation and a restriction on working hours. See <i>Section 1 of this table.</i></p>	<p><i>(Continuous through construction).</i></p> <p>Ministry of Infrastructure, Labour Department and Environmental Health for monitoring in accordance with their legislation <i>(intermittently through construction, and in investigation of complaints referred to them by ORTCP).</i></p>
<p>3. Activities causing water pollution, such as:</p> <p>(I) leakage of fuels and oils from equipment</p> <p>(ii) accidental spills of fuels, oils, cement products or other chemicals.</p> <p>(iii) Improper site wastewater and solid waste management.</p> <p>(iv) Inadequate Sewerage disposal practices</p> <p>Although the site is not in too close proximity to the harbour, water runoff will eventually drain into the harbour during heavy rains.</p>	<p>3.1 Water pollution, resulting in:</p> <ul style="list-style-type: none"> · damage to land ecosystems in the Square, such as mortality of fauna, eutrophication, etc. · Health impacts on persons who may come into contact with the water. <p>-Land and water pollution and public health hazards arising from inappropriate/ inadequate liquid waste disposal practices and spillages/ leakages of contaminating materials at the worksite.</p> <p>3.2 Land and water pollution, public health hazards and reduction in amenity value, arising from inappropriate/ inadequate sewage disposal practices.</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 remedial action and payment of compensation for any environmental damage resulting from his actions.</p> <p>3. Contractor should minimise and carefully control use of chemicals.</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> <ul style="list-style-type: none"> -Construction of a dedicated chemical storage structure to be roofed with a lockable door. -The floor to be equipped with a continuous curb to retain spilled materials. -Chemicals not to be stored near burning material or hot work (welding, grinding) or in shop areas. -Adequate space and shelving to be provided to properly segregate chemicals. -Dry materials to always be placed above liquids, never vice versa. -Liquids not to be stored above eye level. 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costings <i>(bid preparation)</i> · implementation of recommendations and approved Management Plans <i>(throughout construction)</i> <p>Supervisor, for monitoring compliance of Contractor during implementation <i>(Continuous throughout construction).</i></p> <p>CCC, Environmental Health, and Fisheries, for monitoring in accordance with their legislation <i>(intermittently through construction, and in investigation of complaints referred to them by ORTCP).</i></p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		<ul style="list-style-type: none"> - Storage for PPE to be provided where it is easily accessible in the event of emergency, but not in the chemical storage area. -Appropriate emergency wash area to be provided. -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. -Procedures in the handling of chemicals or other hazardous material and in event of emergency to be clearly posted on the container. 7. Contractor should install secondary containment for fuel stored on site. 8. Contractor should adopt pollution prevention measures relating to fuel and oil storage/dispensing arrangements, to prohibit other than emergency maintenance of equipment and vehicles on the site, and require usage of spillage trays during on-site refuelling of minor equipment. 9. Waste oils arising from emergency servicing of construction equipment will be disposed of at a licensed recycling facility. 10. All washing of vehicles, plant and tools to be carried out at designated areas within the work site which are provided with oil/grease traps. 11. Contractor should abide by Public Health Act of 1975 and Regulations, in the provision of sanitary facilities for workers on site. 12. Sewage will not be permitted to enter the drainage systems. 13. Contractor should prohibit the use of worksite pit latrines. 14. Requirements for provision of adequate non-polluting worksite sanitary facilities include provision of sufficient number of adequate toilet facilities on the 	

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		<p>site, connected to suitable treatment, or otherwise collected and disposed of.</p> <p>15. All workers to be required to use these facilities. Workers who refuse are to be subject to dismissal.</p>	
4. Workforce Deployment	4.1 Creation of construction employment opportunities for local residents.	<p>1. The contractor should make maximum use of local labour.</p> <p>2. The contractor should maximise use of labour-intensive construction methods rather than mechanisation.</p> <p>3. The contractor should maximise 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.
	4.2 Development of social friction between the contractor's workforce and the public.	<p>1. The contractor should assign responsibility for dealing with complaints from the general public to the site foreman, whose name and contact details should be shown on the project signboard.</p> <p>2. The contractor should establish a Grievance Redress Mechanism (GRM) for the communities and workers which sets out the relevant dates, details of the complainant, the nature of the complaint, action taken, and other relevant details.</p> <p>3. The contractor should take appropriate measures to ensure that the site is well secured in order to protect assets on site.</p> <p>4. Contractor should develop and maintain a code of conduct for all personnel, including sub-contractors for site activities.</p>	
	4.3 Health and safety hazards to the workforce arising from participating in an inherently dangerous occupation.	<p>1. Contractor will have full regard for the safety of all persons entitled to be on the site and manage the site and works in an orderly manner appropriate to avoid danger.</p> <p>2. The standards and guidelines regarding health and safety shall be the draft Labour Code. The Factories Regulations (Cap. 106 of 1948) and the Occupational Health and Safety (OHS) Guidance should be developed as part of this and implemented by the contractor.</p>	

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		<p>3. The contractor should designate a qualified senior member of his site staff as Health and Safety Officer with the responsibility to ensure that all workforce health and safety matters are properly and fully addressed.</p> <p>4. The contractor should provide personal protective equipment such as protective helmets safety boots, protective clothing, ear muffers, dust masks, gloves etc. suitable for the activities being undertaken by the workforce, and make it a condition of employment that these are worn when needed.</p> <p>5. The contractor should convene regular health and safety meetings with the workforce to reinforce safe work practices and expectations.</p> <p>6. The contractor will provide lights, guards, fencing etc. for protection of the works and for the safety and convenience of the public or others where necessary.</p> <p>7. The contractor should procure the requisite insurances.</p> <p>8. Accidents will be promptly reported to the Labour Department and requisite procedures followed. Near misses will be recorded by the Health and Safety Officer.</p>	
	<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 as a consequence of his methods of operation, including the following:</p>	

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		<ul style="list-style-type: none"> - Train workers in environmental issues and measures to be taken. - Designate an officer to supervise and ensure compliance with environmental obligations. - incorporate environmental and other issues into the agenda of regular meetings with workers. - order immediate suspension or halt any activity which is causing, or is likely to cause significant environmental damage, and to commit to make good any such damage at his own expense, in accordance with the instructions of the relevant authorities. - Require the immediate and permanent dismissal from site of any member of the workforce who is committing or has committed acts prejudicial to the environment, including theft or interference with property and offensive behaviour. - Provide and enforce worker use of appropriate, accessible solid waste disposal facilities. 	
<p>5. Excavations resulting in chance finds of physical cultural resources (PCR) and destruction or loss of physical cultural resources.</p>	<p>5.1 Damage to archaeological sites and protected areas.</p> <p>5.2 Damage to cultural heritage.</p>	<p>1. Contractor should not damage archaeological sites, protected areas and cultural heritage. If any damage is done works should stop immediately and the supervision team should be informed.</p> <p>2. Follow guidance in the Chance Find Procedures (CFP).</p> <p>3. The statue of Derek Walcott should not be interfered with and should remain as is</p>	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costings (<i>bid preparation</i>) · implementation of Recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>continuous through construction</i>).</p> <p>ORTCP for monitoring and referring to relevant agencies.</p> <p>Line agencies (National Trust, A & H Society, National Archives) for monitoring in accordance with their legislation or mandate (<i>intermittently through construction, and in investigation and management of chance finds referred to them by ORTCP</i>).</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
<p>6. Traffic delays and road closures, from:</p> <p>(i) Works adjacent to the roadway that encroach on one or both lanes.</p> <p>(ii) Inappropriate contractor activity beyond the work site.</p>	<p>6.1 Traffic delays and road closures, impacting:</p> <ul style="list-style-type: none"> · All road users (vehicular and pedestrian) originating from or traversing through the area · Businesses and other sensitive receptors operating in the area 	<ol style="list-style-type: none"> 1. Develop traffic management plan based on the Environmental & Social Best Practices Guidance 2. Full road closures and inordinate delays may be avoided if the following approach is used: <ol style="list-style-type: none"> a. Ensure that operators and occupiers of premises immediately adjacent to the proposed worksite are informed of the proposed timing of the works, and of provisions to be put in place to facilitate access to their premises, so they may plan deliveries and other activities accordingly; b. Ensure proper traffic controls are in place in accordance with best practice and the <i>traffic management plan</i> (signage, personnel, and barriers). c. Ensure that worksites are properly signed and cordoned off to facilitate safe passage of vehicles at all times, including during periods that the site is inactive; d. Ensure that emergency responders are kept abreast of the location of works and implications for traffic. e. collaborate with the public in a public awareness campaign, including timely Public Service Announcements (this will be part of the broader project communications plan); f. if a road closure is unavoidable, plan this outside of peak traffic times; 	<p>Designer, for:</p> <ul style="list-style-type: none"> · identifying options for discussion with Relevant parties. <p>ORTCP, for:</p> <ul style="list-style-type: none"> · support in implementation of public awareness campaign (<i>in advance of implementation in affected area</i>). <p>Contractor, for: incorporation of Recommendations into work plan and costings (<i>bid preparation</i>) implementation of recommendations and approved Management Plans (<i>through construction</i>)</p> <p>Supervisor, for: monitoring compliance of Contractor during implementation (<i>continuous through construction</i>)</p> <p>Consultant monitoring compliance of Contractor during implementation (<i>continuous through construction</i>)</p>
<p>7. OSH concerns in all work activities, including:</p> <p>(i) Operation of heavy equipment.</p> <p>(ii) Working in proximity to operating equipment.</p> <p>(iii) Working in proximity to road traffic adjacent to the worksite.</p>	<p>7.1 OSH impacts, resulting in worker illness, lost work time, disability, chronic health issues, or death.</p>	<ol style="list-style-type: none"> 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. 2. Comply with the Occupational Health and Safety (OHS) Guidance 3. Also refer to Environmental & Social Best Practices Guidance (Appendix 6) 	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>throughout construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>Throughout construction</i>).</p> <p>Labour Department,</p>

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
(iv) Working in proximity to overhead and buried infrastructure. (v) Exposure to noise and dust. (vi) Initiation of instability arising from changes in natural slope geometry, with adverse implications for workforce safety during construction.		4. The contractor will accept full responsibility for the adequacy, stability and safety of all operations and methods of construction, as well as have full regard for the safety of all persons entitled to be on the site and keep the site and works in an orderly state appropriate to avoidance of dangers. 5. Construction will be carried out such as not to promote instability during construction. Excavated slopes will not exceed 2:1. 6. Excavation sides in excess of 1.5 m will be battered back or shored. 7. All works will be carried out in accordance with the approved plans.	Environmental Health and Ministry of Infrastructure for routine inspections, handling of complaints referred to them by ORTCP, general public or workers.
8. Public Health and Safety concerns, through: (i) Noise, dust and Equipment emissions from nearby works. (iii) Vehicular and pedestrian traffic adjacent to the works	8.1 Public Health and Safety concerns, through: · reduced air quality in the vicinity of the works, affecting road users and users of adjacent properties · reduced safety of passage near the works for pedestrians and vehicles	1. Apply the approved Traffic Management Plan. 2. Follow the Environmental & Social Best Practices Guidance for general safety and convenience of the public; and Emergency procedures to be instituted. 3. See also, recommendations in this Table for noise and dust.	Contractor, for: · incorporation of recommendations into work plan and costings (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) Supervisor, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>). Ministry of Infrastructure, CCC and Environmental Health for routine inspections, handling of complaints referred to them by ORTCP.
9. Landscape, terrestrial, aquatic and marine ecologies affected by all work activities, in particular: (I) Works that expose soils to erosion. (ii) Equipment operation. (iii). Storage and use of cement and other chemicals on site.	9.1 Damage to landscape, cultural heritage, terrestrial, ecologies by: · sedimentation from erosion of works area spoil, and aggregate stockpiles; · Pollution from leaking equipment or accidental spills. Chance finds of physical cultural resources are highly unlikely and not considered to be a high-risk during these works	1. Follow Environmental & Social Best Practices Guidance 2. General requirements for protection of the environment 3. Mitigation measures during earthworks 4. mitigation of noise and dust risks 5. mitigation of pollution from solid, liquid waste and hazardous materials/wastes 6. chance finds of cultural heritage	Contractor, for: · incorporation of Recommendations into work plan and costings (<i>bid preparation</i>) implementation of recommendations and approved Management Plans (<i>through construction</i>) Supervisor, for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>). CCC, Ministry of Infrastructure,

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
(iv) Stockpiling of materials (inputs and waste) within the worksite		<p>7. There must be no unnecessary clearing of natural vegetation.</p> <p>8. Avoid the use of herbicides or other chemicals.</p> <p>9. The contractor must ensure that there is minimal impact to flora and fauna within the work area.</p> <p>10. All recognized natural habitats, and protected areas in the immediate vicinity of the activity must not be damaged or exploited.</p> <p>11. A survey and an inventory shall be made of large trees in the vicinity of the construction activity, large trees shall be marked and cordoned off with fencing, their root system protected, and any damage to the trees avoided.</p>	<p>Environmental Health, Forestry and Fisheries Departments for monitoring in accordance with their legislation (<i>intermittently through construction and investigation of complaints referred to them by ORTCP</i>).</p>
10. General Construction Operations	10.1 Hazards associated with roadside storage of construction materials and parking of plant and vehicles.	<p>1. No parking or stockpiling of materials will be allowed along the public roadway.</p> <p>2. No materials shall be stored so that they encroach on, or in any way adversely affect operation of, sections of roadway which are in use by the public or result in siltation or blockage of drains.</p> <p>3. Contractor should plan for the temporary storage of construction materials and wastes, and the parking of construction plant within the worksite only. This will be part of the Site Management Plan.</p>	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>continuous through construction</i>).</p>
	10.2 Impedance of access to/from lands adjacent to the worksite.	<p>1. All operations will be carried out so as not to interfere unnecessarily or improperly with the convenience of the public, or access to and use and occupation of public or private roads, footpaths and properties.</p> <p>2. Neighbouring users will be informed in advance of any activity that has the potential to impede access to their properties or other public spaces.</p>	<p>Contractor, for:</p> <ul style="list-style-type: none"> · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) <p>Supervisor, for monitoring compliance of Contractor during implementation (<i>continuous through construction</i>).</p>

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

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

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

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

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		authorities. Any such site shall also be properly cleared and remediated upon works completion.	<i>(Continuous through construction).</i>
	10.13 Economic displacement	1. Formulation and implementation of an Abbreviated Resettlement Action Plan, including the Grievance Redress Mechanism (GRM)	ORTCP for formulation and implementation of the ARAP and GRM CCC and Ministry of Equity for assistance in the implementation of the ARAP and grievance redress Contractor and supervisor for accepting grievances and forwarding to ORTCP
11. Building construction on land.	11. Dramatic alteration of views/diminished aesthetics of the site from the air, and the roadway.	1. A Site Management Plan should be developed and implemented by the Contractor. 2. Hoarding will be erected to conceal construction activity from persons in close proximity to the site. 3. All electrical and telecommunications cables will be underground.	Contractor , for: · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations (<i>through construction</i>) Supervisor , for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).
12. Concrete works	12.1 Dust and other air pollution arising from the operation of concrete plant.	1. The amount of concrete to be mixed on site will be minimised. Concrete requirements will be met by use of pre-mixed concrete. 2. Concrete mixed on site will be done within specially constructed mixing bays designed to contain fugitive emissions. 3. All moveable plant will be fitted with effective dust suppression equipment and operated and maintained in accordance with the manufacturer's manuals.	Contractor , for: · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) Supervisor , for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).
	12.2 Pollution of water bodies and fish kills, resulting from entry of cement dust, fresh concrete and mixer wash in water.	1. The amount of concrete to be mixed on site will be minimised. Concrete requirements will be met by pre-mixed concrete. 2. A concrete mixing bay will be constructed to minimize concrete losses. 3. Particular care will be taken when construction activities are carried out in or in the vicinity of drainage systems and over water bodies to ensure that pollution does not occur.	Contractor , for: · incorporation of recommendations into work plan and costing (<i>bid preparation</i>) · implementation of recommendations and approved Management Plans (<i>through construction</i>) Supervisor , for monitoring compliance of Contractor during implementation (<i>Continuous through construction</i>).

Project Action or Activity	Potential Impacts	Mitigation Measures Recommended	Responsibility Timing and Frequency
		<p>4. Concrete will not be poured in exposed areas during rains.</p> <p>5. Although quantities of concrete mixed on site are anticipated to be small as premix will be preferentially used, special precautions will be taken to ensure that materials such as cement dust, fresh concrete and lime do not pollute water bodies.</p> <p>6. Washing of ready-mix equipment or dumping of excess concrete on site will be prohibited.</p>	

9.3 COVID-19 Guidelines for Operations

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

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

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

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

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

WHAT SHOULD THE CONTRACTOR COVER?

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

PIUs and contractors should refer to guidance issued by relevant authorities, both national (see National Guidelines below) and international (e.g. WHO), which is regularly updated. Addressing COVID-19 at a project site goes beyond occupational health and safety, and is a broader project issue which will require

the involvement of different members of a project management team. In many cases, the most effective approach will be to establish procedures to address the issues, and then to ensure that these procedures are implemented systematically. Where appropriate given the project context, a designated team should be established to address COVID-19 issues, including PIU representatives, the Supervising Engineer, management (e.g. the project manager) of the contractor and sub-contractors, security, and medical and OHS professionals.

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

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

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

9.4 Operations Phase Mitigation

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

Key impacts and mitigation measures are:

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

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

10. TRAINING AND ENVIRONMENTAL AWARENESS

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

members are aware of the emergency response procedures. All staff should receive environmental induction training and managerial staff should receive additional training.

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

11. THE ABBREVIATED RESETTLEMENT ACTION PLAN

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

An Abbreviated Resettlement Action Plan (ARAP) will be prepared and will provide details on the likely impacts resulting from the upgrade of Derek Walcott Square. The RAP will contain the following elements:

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

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

Table 6 Estimations based on population that may be displaced

Sub-Project: Construction of Visitor Centre		
Permanent Land acquisition	No	
Temporary land acquisition	No	
Temporary Loss of livelihoods	Possibly	
Permanent loss of livelihoods	No	

Loss of assets	No	
Resettlement (What needs to be moved?)	1 vendor who sells coconut oil. the vendor is more or less an itinerant trader and moves from site to site. Therefore, we will continue to monitor the site to assess existence of PAPs.	The vendor has no assets to be moved as he sits on one of the benches outside the Park and places the bottles on a low wall next to the bench.
Asset Compensation (What is to be compensated?)	None	

12. GRIEVANCE AND REDRESS MECHANISM

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

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

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

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

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

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

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

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

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

- Does the project have clear, formal, and transparent internal mechanism (e.g.) a grievance redress unit, grievance redress committees, designated grievance redress officers) and rules for addressing grievances?
- Do project officials responsible for grievance redress have the authority to take or demand remedial action?
- Are officials responsible for grievance redress obliged to take action on all grievances?
- Do project-affected people feel that they can lodge grievances without fear of retaliation?
- Are project beneficiaries aware of their right to file a grievance and of the grievance redress process in general?
- Are there internal processes in place to record, track, and monitor the grievances and the action taken on them?
- Does the GRM provide timely feedback (written or otherwise) to the petitioner on actions taken?
- Is there an appeal process in place that GRM users can access if they are not satisfied with how their grievance has been resolved?

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

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

Processing Grievances

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

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

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

The steps undertaken should a grievance arise are as follows:

Grievance Redress Procedures

Grievances from affected parties	<ul style="list-style-type: none"> • Grievances made verbally to the Social Safeguards Officer
Access Point	<ul style="list-style-type: none"> • The PCU serves as the access point for grievances
Grievance Log	<ul style="list-style-type: none"> • Grievances received verbally are documented, verified and signed by both parties. • Grievances will be copied to the relevant authority
Assessment	<ul style="list-style-type: none"> • Grievances categorized by type. Determination of eligibility of grievance. • The first assessment of the grievance is conducted by the PCU and technical officers from the pertinent GOV authorities. • Letters acknowledging the grievance is issued by the PCU

	<ul style="list-style-type: none"> The Social Transformation Officer (STO) for the region provides assistance with dealing with conflict resolution and grievance. The STO will communicate all disputes and grievances to the PCU immediately when received. Should a dispute arise, the applicable Laws of Saint Lucia will prevail.
Resolution and Follow-up	<ul style="list-style-type: none"> Development of an Implementation Plan for resolution of grievances.

Communicating a Grievance

(i) Who can submit a Grievance?

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

(ii) How is the Grievance Communicated?

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

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

By letter, addressed to the: Project Manager

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

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

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

The Grievance should include the following information:

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

(d) The description of the potential or actual harm;

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

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

APPENDICES

Appendix I- GRM Form



OECS REGIONAL TOURISM COMPETITIVENESS PROJECT

REGISTRATION OF GRIEVANCE

Please use CAPITAL LETTERS

Name of Project Site: _____

The complainant prefers to not have his / her name registered

From:

Name: _____

Gender: Female Male

Contact No: _____

Address: _____

Preferred method of contact: Telephone call WhatsApp / Messenger Letter

Email *(Please provide address)* _____

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

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

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

(a) _____

(b) _____

(c) _____

(d) _____

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

Date: _____ Time of Reporting: _____

dd/mm/yy

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

WhatsApp / Messenger

(Signature of aggrieved person) _____

Name of recording Officer: _____ (Signature) _____

(Please print)

List all documentation enclosed: (continue overleaf)

Appendix II– Grievance Log Template

Appendix III– Guidelines for the Submission of Waste Management Plans for Development



SAINT LUCIA SOLID WASTE MANAGEMENT AUTHORITY

GUIDELINES FOR THE SUBMISSION OF WASTE MANAGEMENT PLANS FOR DEVELOPMENTS

(Revised September 2013)

Purpose of the Guidelines

These guidelines are intended to:

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

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

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

1.0 Introduction

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

2.0 Pre-Construction Phase

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

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

2.2 *Waste Description & Quantities*

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

2.3 *Waste Diversion*

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

2.4 *Waste Transportation*

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

3.0 **Construction Phase**

3.1 *Waste Description & Quantities*

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

3.2 *Waste Storage*

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

3.3 *Waste Transportation*

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

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

3.4 *Waste Collection Frequency and Spill Control*

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

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

4.1 **Operational Phase**

- 4.1 Indicate the propose use(s) of the development upon completion.
- 4.2 Indicate the number, capacity and type of waste receptacles which will be provided on the premises and where they be placed for the storage of waste generated.
- 4.3 Indicate the frequency with which the waste will be disposed and at which landfill.
- 4.4 Indicate what measures will be taken in order to prevent access by vagrants and members of the public to the stored solid waste.
- 4.5 Indicate the manner in which the waste will be placed out on the road curb/sidewalk for collection and the frequency.
- 4.6 Indicate whether the building will be used for both residential and commercial purposes.
- 4.7 For commercial establishments, indicate who will be responsible for the disposal of the waste. In accordance with the Waste Management Act No. 8 of 2004, section 33 subsection 1, "Any person who conduct industrial, commercial or institutional operations must make their own arrangements for waste management and shall ensure that any waste generated does not present a risk to human health, safety or the environment".

Please note:

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

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

Appendix IV- Safeguards Quarterly Report Template

Appendix V – Derek Walcott Square Upgrade Occupational Health and Safety (OHS) Guidance

Appendix VI – Derek Walcott Square Upgrade Environmental and Social Best Practices

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

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

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

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

This includes but is not limited to:

- Hard hats
 - Footwear
 - Gloves
 - Safety goggles
 - Coveralls
 - Dust mask or respirators based on the activities and the exposure. (respiratory protection is mandatory for all at the construction site)
2. Avoid close contact with other co-workers (6 feet distance).
 3. Train workers in the proper use of personal protective equipment.
 4. Ensure that employees use PPE at all times while performing duties. Employees shall not be allowed on the site without the necessary PPE.
 5. Ensure fall protection measures (nets, scaffold) are in place for work at heights. Where collective fall protection measures are not possible, persons working at heights shall be provided with the appropriate fall arrest/restraint equipment such as harnesses.
 6. Scaffolds **must** be erected and inspected by competent person(s) and the results recorded.
 7. All work equipment, plant and machinery are to be maintained in a safe condition and inspected regularly before use. All tools and machinery shall be properly guarded and protected.
 8. Appropriate first aid devices must be provided on site.
 9. Portable drinking water must be provided on site and easily accessible by all employees.
 10. Access to washroom and handwashing facilities or hand sanitizers.

11. Workers with flu symptoms should be removed from the work site and must receive medical attention.
12. Report all occupational accidents to the Department of Labour as stipulated in Section 246 of the Labour Act; that is within seventy-two (72) hours, however in the case of death, immediately.
13. Ensure systems are in place for consultation with workers on safety, health and welfare matters.
14. Encourage workers to report any safety and health concerns.
15. Approval will be granted by the Labour Department upon submission and review of the relevant documentation, plans and previous inspections where applicable.
16. Submit occupational safety and health plan/policy to the Department of Labour.
17. Pay particular attention to the provisions of the following Sections of the Act:
 - 256 - Duties of employers at construction sites
 - 257 - General Duties of employers
 - 260 - General Duties of employees
 - 261 - Duties of owners at construction sites
18. Adherence to all directives and guidelines from Chief Medical Officer.
19. The Department of Labour reserves the right to halt all activities at any site where there is a failure on the part of any party to comply with the stipulated guidelines.

COVID-19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS

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

- (a) **ASSESSING WORKFORCE CHARACTERISTICS:** Many construction sites will have a mix of workers e.g. workers from the local communities; workers from different parts of the country; and even workers from other countries. Workers will be employed under different terms and conditions and be accommodated in different ways. Assessing these different aspects of the workforce will help in identifying appropriate mitigation measures:
 - The Contractor should prepare a detailed profile of the project work force, key work activities, schedule for carrying out such activities, different durations of contract and rotations (e.g. 4 weeks on, 4 weeks off).
 -

(b) ENTRY/EXIT TO THE WORK SITE AND CHECKS ON COMMENCEMENT OF WORK Entry/exit to the work site should be controlled and documented for both workers and other parties, including support staff and suppliers.

- Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.
- Training security staff on the (enhanced) system that has been put in place for securing the site and controlling entry and exit, the behaviours required of them in enforcing such system and any COVID - 19 specific considerations.
- Training staff who will be monitoring entry to the site, providing them with the resources they need to document entry of workers, conducting temperature checks and recording details of any worker that is denied entry.
- Confirming that workers are fit for work before they enter the site or start work. While procedures should already be in place for this, special attention should be paid to workers with underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.
- Checking and recording temperatures of workers and other people entering the site or requiring self reporting prior to or on entering the site.
- Providing daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.
- During the daily briefings, reminding workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.
- Preventing a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or (if that is not possible) isolating such worker for 14 days.
- Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.

(c) GENERAL HYGIENE Requirements on general hygiene should be communicated and monitored, to include:

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

- Setting aside an area for precautionary self-quarantine as well as more formal isolation of staff who may be infected prior to taking to healthcare facility

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

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

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

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

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

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

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

- If a worker has symptoms of COVID-19 (e.g. fever, dry cough, fatigue) the worker should be removed immediately from work activities and isolated on site.
- If testing is available on site, the worker should be tested on site. If a test is not available at site, the worker should be transported to the local health facilities to be tested (if testing is available).
- If the test is positive for COVID-19 or no testing is available, the worker should continue to be isolated. This will either be at the work site or at home. If at home, the worker should be transported to their home in transportation provided by the project.

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

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

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

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

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

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

- Communications should be clear, regular, based on fact and designed to be easily understood by community members.
- Communications should utilize available means. In most cases, face-to-face meetings with the community or community representatives will not be possible. Other forms of communication should be used; posters, pamphlets, radio, text message, electronic meetings. The means used should take into account the ability of different members of the community to access them, to make sure that communication reaches these groups.
- The community should be made aware of procedures put in place at site to address issues related to COVID-19. This should include all measures being implemented to limit or prohibit contact between workers and the community. These need to be communicated clearly, as some measures will have financial implications for the community (e.g. if workers are paying for lodging or using local facilities). The community should be made aware of the procedure for entry/exit to the site, the training being given to workers and the procedure that will be followed by the project if a worker becomes sick.

- If project representatives, contractors or workers are interacting with the community, they should practice social distancing and follow other COVID-19 guidance issued by relevant authorities, both national and international (e.g. WHO).

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