GOVERNMENT OF ST. LUCIA

# ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN
# FOR

# THE DEMOLITION OF THE MARKETING BOARD BUILDING TO ACCOMMODATE CONSTRUCTION OF A BOX PARK AS PART OF THE CASTRIES MARKET REDEVELOPMENT PROJECT

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

|April 2021|

# Contents

**ACRONYMS AND ABBREVIATIONS**

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

## 1.0 INTRODUCTION

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

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

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

To accommodate the construction of the Box Park, the building, which was until very recently used by the St. Lucia Marketing Board, has to be demolished. The demolition of the said building is not financed under the ORTCP, however, because the demolition is specifically to accommodate the Construction of the Box Park which is funded by the ORTCP, in keeping with the World Bank policies, the building to be demolished is considered an "Associated Facility". According to World Bank policy, Associated Facilities are facilities or activities that are not funded as part of the project and, in the judgment of the Bank, are: (a) directly and significantly related to the project; and (b) carried out, or planned to be carried out, contemporaneously with the project; and (c) necessary for the project to be viable and would not have been constructed, expanded or conducted if the project did not exist. The Policy explains that where a common approach has been agreed for the project, the common approach will apply to the Associated Facilities. In this case an Environmental and Social Management Plan (ESMP) has been developed for the Construction of the Box Park, and continuing with this approach this ESMP is being presented to ensure that the Bank's environmental and social safeguard policies are utilised to prevent and mitigate undue harm to people and their environment by the demolitions. The ESMP consists of the set of mitigation, monitoring and institutional measures to be taken during implementation to eliminate adverse environmental and social impacts, or offset them or reduce them to acceptable levels. The Plan also includes the actions needed to implement these measures.

## 2.0 PROJECT DESCRIPTION /SCOPE

The scope of the project is to demolish the existing Marketing Board building to accommodate the proposed Box Park building. The building to be demolished is a single storey concrete framed and blockwork building, with a flat concrete roof. Due to the size and height of the structure, it is anticipated that the building can be demolished without the use of implosion, or explosive means, but rather by the use of excavators and jack hammers, which will reduce the level of vibration required.

## 3.0 DEMOLITION METHODOLOGY

Demolition Requirements for Compliance with Environmental, and Health and Safety Measures for The St. Lucia Marketing Board Building

### 3.1 Introduction

The demolition of the St. Lucia Marketing Board building involves the demolition of a mainly single storey, with a small two storey section, of a concrete frame and blockwork structure with mainly concrete flat roof and small timber frame with metal roof covering area. The building is some 7,750 sq.ft. or 720 sq.m. in area, and is at least 60 years old. The site is located on the corner of Jean Baptiste Street and Carl Crescent, a small side street, which traverses the front of the Castries Development Complex (CDC) buildings opposite the Marketing Board.

The demolition is necessary to facilitate construction of the proposed Box Park, as part of the ORTCP projects.

### 3.2 Site Investigation

A site investigation was carried out on Tuesday April 13, 2021. Photographs taken are included below. During the site visit the following was noted:

1) The building is largely single storey, with only a small section to the western side of the building being two storeys with a suspended slab. There is a section of the building to the northwest that is two storeys in height, but has no internal first floor slab, which accommodates a large walk-in freezer.
2) Most of the soffit of the concrete roof slab is exposed as the internal ceiling, with a few areas having plywood drop ceilings. The concrete on much of these exposed soffits is spalling, with areas of rebar clearly visible.
3) The existing roof slab is leaking and there are several indications of mold throughout the structure.
4) There was no indication of any asbestos within the structure.
5) There was no indication of lead paint within the structure.
6) There was a large amount of termite damage throughout the structure, especially to some timber framed walls and ceilings.
7) There are no indication of persons occupying the premises or persons that could be affected by the demolition, as the operations of the Marketing Board have been relocated from April 07 2021.

### 3.3 Demolition

Demolition or dismantling refers to breaking up of buildings or structures either fully or partially. When carrying out demolition work, the requirements relating to construction work must be complied with.

Demolition techniques may include:

1) Non-Engineering Demolition
- Manual Demolition

2) Engineering Demolition
- Mechanical Method
- Implosion
- Deconstruction Method

1) Non-Engineering Demolition

Manual Demolition: This is normally carried out by contractors using manual tools which are portable, and tools used may include Sledgehammers, Jack Hammers and Drillers.

This is an expected form of demolition to be undertaken in this instance.

2) Engineering Demolition

Mechanical Methods may include the following:

1. Wrecking Ball Method
2. Pusher Arm technique
3. Thermic Lance Technique
4. Non – Explosive Demolition
5. Concrete Sawing Method
6. Deliberate Collapse Method
7. Pressure Jetting

The only technique, in this instance, which may be employed under engineering demolition is the Pusher Arm Technique.
Pusher Arm Technique: A Hydraulically powered pusher arm machine is mounted on tracked or wheeled chassis, for example an excavator or backhoe.

**3.4 Precautions Before and During Demolition / Removal**

**Precautions before and during demolition shall be as follows:**

Precautions must be taken before and during demolition in accordance with BS 6187:2011, 'Code of practice for full and partial demolition'.

*"This Code recommends good practice methods for the demolition (both partial and whole), as well as decommissioning, of sites including buildings and structures. It takes into account safety, health and issues which affect the protection of environment. Recommendations are included for:*

*a) the proper, and effective, management of the demolition process;*

*b) maintaining structural stability, through the provision of temporary structural support, where necessary;*

*c) managing deliberate structural collapse.*

*The Code gives recommendations for:*

*– identifying and establishing responsibilities during all phases of the demolition process;*

*– acquiring a knowledge of the site, including its former uses;*

*– appropriate environmental management;*

*– managing health and safety hazards;*

*– carrying out risk assessments, and planning the work accordingly;*

*– establishing and managing procedures effectively;*

*– determining and managing safe exclusion zones."*

3.4.1 The demolition shall not be commenced until precautionary measures have been inspected

and approved by the Project Engineer of the Ministry of Tourism (MOT). It is advisable to inform adjoining properties prior to the demolition so that they may close windows or take other measures.

3.4.2 **Before demolition is commenced and also during the progress of such work, all electric cables, poles or apparatus which are liable to be a source of danger, other than a cable or apparatus used for the demolition works, shall be disconnected.**

3.4.3 During the progress of demolition, the work shall be under the continuous supervision of the demolisher or an experienced foreman. Unless otherwise expressly approved, demolition shall be executed storey by storey commencing at the roof and working downward. All practicable precautions shall be taken to avoid danger from collapse of the building when any part of a frame of the building is removed. When the demolition site adjoins a street or public walkway, notices displaying the words "WARNING: DEMOLITION IN PROGRESS" are to be fixed to the hoarding or security fence.

3.4.4 When the site adjoins a footpath or public thoroughfare, in addition to hoarding, the footpath shall be covered by an overhead protective structure.

3.4.5 Workers should not be deployed at different levels unless adequate precautions are taken to ensure safety of them.

3.4.6 Stairs with hand railing should be kept in place as long as practicable to provide access and egress.

3.4.7 Workers should wear safety equipment including safety belts, harnesses, helmets, vests and gloves, as well as steel toed boots, and should adhere to all local Health and Safety measures.

3.4.8 Workers should not be deployed in areas where spalling concrete could create particular hazard to life, health and safety.

3.4.9 Workers must be provided with additional safety gear if working in areas affected by mold, including gloves, N-95 respirator or half-face respirator with HEPA filter, disposable overalls, goggles/eye protection.

3.4.10 Demolished material shall not be allowed to remain on any floor or structure if the weight of the material exceeds the safe carrying capacity of the floor or structure and such material shall be so piled or stacked that it will not endanger workmen or other persons, and shall be removed as soon as practicable from the site unless otherwise authorized by the Engineer.

3.4.11 Dust creating material, unless thoroughly dampened shall not be thrown or dropped from the building but shall be lowered by hoisting apparatus or removed by material chutes.

3.4.12 Chutes shall be completely enclosed and a danger sign shall be placed at the discharge end of every chute.

3.4.13 No wall or other structure or part of a structure shall be left unattended or unsupported in such a condition that it may collapse due to wind or vibration or otherwise become dangerous.

3.4.14 Protective outriggers shall be installed where necessary to guard against danger to life or property or when required by the Engineer.

3.4.15 Upon completion of the work, notification shall be given to the Engineer that the work has been completed satisfactorily.

**Current Site Photographs**

**Photo 1: St. Lucia Marketing Board front access from Carl Crescent.**


**Photo 2: Southern elevation.**

**Photo 3: Southwest corner of the building with 2 storey office area.**


**Photo 4: Internal former shop space to the eastern side of the building. Note the exposed concrete slab soffits and beams.**

**Photo 5: Exposed concrete slab soffits and beams.**

**Photo 6: Ingress of water from the roof slab above and presence of mold.**

**Photo 7: Ingress of water from the roof slab above and presence of mold.**

**Photo 8: Spalling of concrete from soffit of concrete roof slab.**

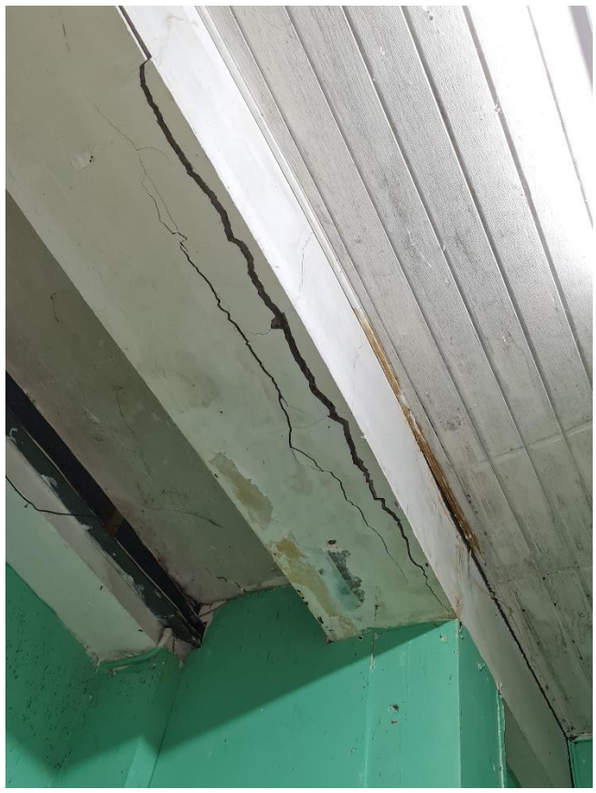

**Photo 9: Cracks in roof support beams.**

**Photo 10: Damage to base of columns with rebar exposure.**

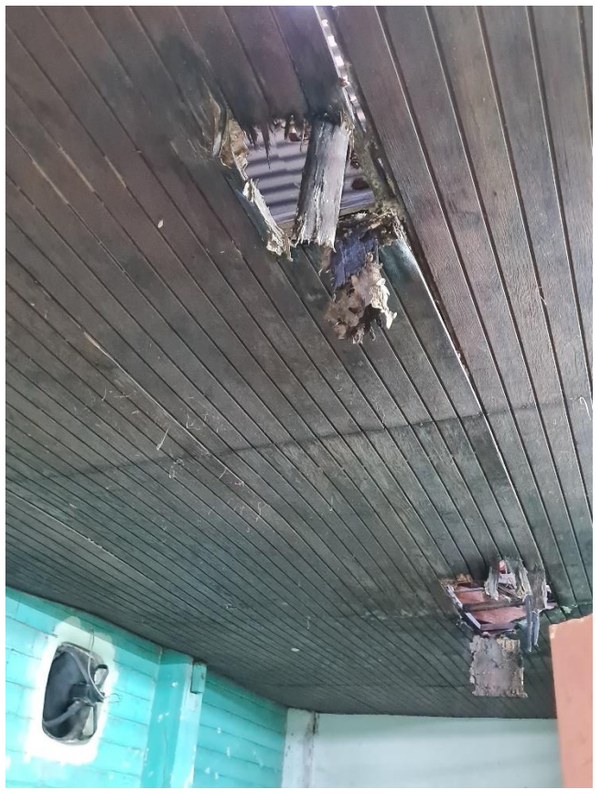

**Photo 11: Water damage to plywood ceiling.**

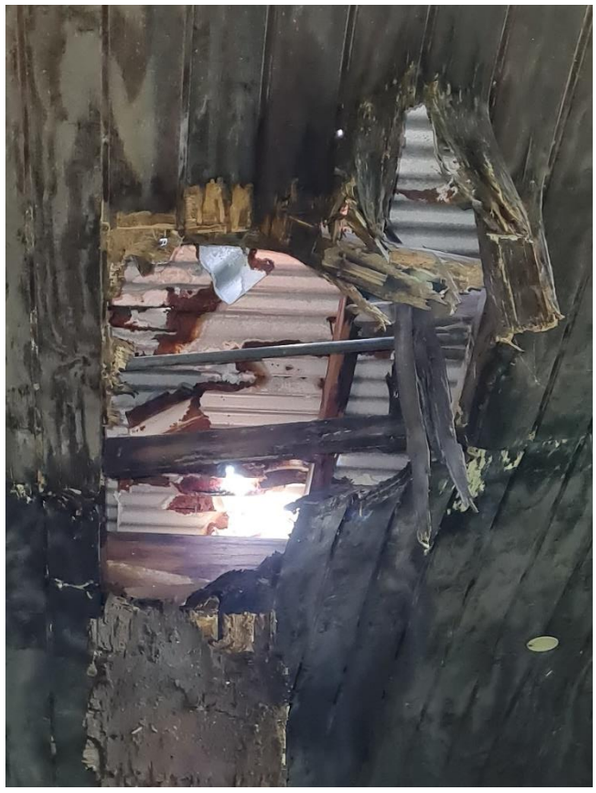

**Photo 12: Water damage to plywood ceiling and damage to roof sheeting.**

**Photo 13: Damage to stiffener column within blockwall.**

**Photo 14: Water and mold damage to timber plywood ceiling. Note proximity of electrical fan.**

**Photo 15: 2 storey section that houses freezer to right of picture.**

**Photo 16: Damaged and actively spalling concrete slab soffit with exposed rebar.**

**Photo 17, Small chunks of spalled concrete on floor from ceiling above.**

**Photo 18. Active termite nest above door in 2 storey office section.**

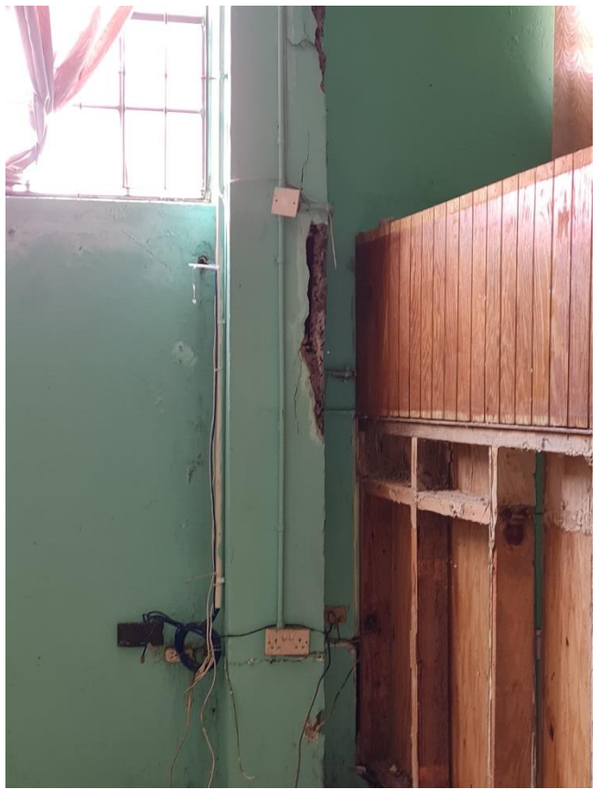

**Photo 19: Damage to column in 2 storey office area.**

**Photo 20: Damage to soffit of concrete roof slab in 2 storey office section.**

## 4. 0 CHARACTERISTICS OF THE PROJECT SITE

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

The site for the construction of the Box Park is within the Castries Market Complex, in the current footprint of the St. Lucia Marketing Board Building. Established in November of 1967 by an Act of Parliament, which makes it a statutory board of the Government, governed by a Board of Directors. The Marketing Board has been serving the agriculture economy by fulfilling its mandate to stimulate, facilitate, and improve the production, marketing and processing of fresh agricultural produce, and by securing the most favourable arrangements for the purchasing and resale, handling, transportation and exportation of the island's agricultural produce both locally and internationally.

Once a vibrant establishment the Marketing Board purchased mainly locally grown fruits and ground provisions from farmers throughout the island, to resell to patrons at competitive prices, as well as regularly supplying goods to local hotels and supermarkets. However, over the years both the number of products available for sale and the number of patrons have declined greatly. This decline may be due to the increase in activity at the Provision Market which is located in very close proximity to the depot, as well as the greater availability of provisions at the main supermarkets which are located in close proximity to the Marketing Board.

At the opening ceremony to mark the start of business at the new location on April 06 2021, the Senior Accountant at the Marketing Board, stated that after 54 years in operation, the structural integrity of the building had become weak and outdated and as such, it had become necessary to demolish the building and to construct a new one that is sound, conducive for shopping and with the right ambience for the 21st century. "It is important to note that this is where the retail outlet carries out most of its function and it normally attracts large numbers of customers daily. Because of the significant role that the department carries, it has become necessary for the St Lucia Marketing Board to temporarily relocate the retail function in preparation for the demolition of this building on Jn Baptiste Street", Mrs. Desir explained.

Also speaking at the ceremony was the Permanent Secretary in the Department of Agriculture, Mr. Barrymore Felicien who expressed that he holds high expectations for the agri-food sector saying that "the Marketing Board plays a pivotal supporting role in linking local farmers to consumers; an active illustration of the Agriculture ministry's slogan, "Eat Fresh; Saint Lucia's Best." He also remarked that the Marketing Board still has a dominant or prominent role to play in the agriculture sector today, and what is anticipated is a Marketing Board that comes back to its dominance, that features highly in the distribution, purchase, marketing sales, packaging and export of agricultural produce."

The Castries Market and the Marketing Board building occupies a strategic position in the city, directly opposite the Castries Waterfront, the Market is a huge tourist attraction, particularly for cruise visitors, who walk through the area coming from and going back to the main cruise ship port. The Castries Market houses the Castries Craft Market, the Provisions Market and the Fish Market, there are also fourteen (14) small units which sell a variety of dry goods and provide salon services on the eastern boundary of the site. The Box Park structure will occupy a portion of the land directly behind these huts which means that there is need for relocation of these structures during construction of the Box Park. However, there is adequate distance between the Marketing Board building and the huts to allow for hoarding during the demolition process, and does not necessitate the relocation of the huts before the demolition. Also, in proximity to the site for the construction of the Box Park is a Minibus Terminal which serves as the drop-off and pick-up point for four different bus routes.

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

The very busy John Compton Highway, runs along the front of the Market Complex and branches out into smaller streets such as Jn. Baptiste Street which runs directly along the project site and further along to Darling Road. The Independence Monument which was erected in 2019 located at a roundabout on the

John Compton Highway and the Castries Harbour are approximately twenty metres away. Pointe Seraphine a major cruise ship port is more distantly located but is quite visible from the Market Complex.

**Map of Castries Waterfront**


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

CCB - **Conway Carpark Building**

GB **- Government Buildings**

JBS **– Jn. Baptiste Street**

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

## 5.0 SITE SPECIFIC ENVIRONMENTAL AND SOCIAL IMPACTS

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

The major sensitive receptors in very close proximity to the site are the Camilla Alexander Fish Vending Facility, the Castries Provision Market, with over 100 booths, and the bus terminal which serves the La Clery, Babonneau, Bisee and Monchy bus routes. Pre- Covid 19, during the slowest part of the work day, there were more than 40 buses parked in the area near the project site as well as the drivers who usually

sit in their buses or congregate in small groups at different points in the terminal, which is mainly an open area with a very small covering which can accommodate one or two buses at a time. Given the current situation with congestion of minibuses along the streets in the city it is unlikely that the bus terminal can be relocated during demolition. Further, there are no plans to relocate the vendors who were displaced between 2019 and 2020 to accommodate the construction of the provision market and have since returned to operate at the new provisions market. For this reason, mitigation measures such as the development and implementation of a traffic management plan, and a site management plan, including provisions for pedestrian movement, and use of hoarding and signage is paramount to ensure the safety and security of the vendors, the bus drivers, their clients and their property and the general public. Formal correspondence to each minibus association as well as regular updates via the radio and television will be utilized to keep the bus drivers and the market vendors informed of the different stages of the demolition. Additionally, Whatsapp and text messages will be forwarded to the president of each bus association who will in turn inform their respective members.

To ensure that the other sensitive receptors in proximity to the site, mainly the government offices and residential apartment buildings near the site, will not be unduly affected during construction, the contractor will follow specific guidelines outlined in Table 3 below, regarding noise and dust pollution during their operations and the impacts on these receptors, but other measures such as consultation with the various stakeholders, through formal correspondence as well as notices on radio and television will be used to keep stakeholders informed of the project generally and activities that may create inconvenience beyond what is expected during normal construction work.

Measures to mitigate noise and dust pollution will also be important to ensure that the major stakeholders, the vendors, the bus drivers and the contactor can operate without disruption to each other's activities. Advisories on road closures and traffic diversions if required will be approved by the Traffic Department of the Royal St. Lucia Police Force (RSLPF) and given with sufficient notice to allow commuters and bus drivers to make necessary changes to their schedules In addition to the mitigation measures, the demolition will be undertaken during the slowest times in the city, which are Saturday afternoons, because most business places in the city stop operations mid- afternoon on a Saturday, or on a Sunday where there are almost no operations, in the city especially in the market.

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

The Castries Harbour is located in close proximity to the project site, although a section of the Provision Market and the John Compton Highway which runs directly to the front of the site acts as a buffer separating the waterfront from the site. For this reason, the likelihood of pollution of the marine environment is reduced. However, the contractor will also adhere to guidelines in Table 3 below to further reduce that occurrence especially because the area is prone to flooding during heavy rains.

Because the site for the demolition can be securely hoarded without affecting the operations of the vendors and because the demolition work will be implemented on the slowest business days, that is Saturday afternoon and Sunday, and also because the building can be demolished and the site cleared within two days, it is anticipated that the activity can be carried out without any major adverse effects to the vendors and their operations. Therefore, there will be no need to relocate the vendors before the demolition. However, as part of the communication plan and during consultation the vendors will be sensitized on the Grievance Redress Mechanism to ensure that they can lodge any complaints or grievances that they may have.

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

| | |
|---|---|
| Positive Impact | Employment opportunities created during the demolition. |
| | The demolition will facilitate the construction of a new and modern structure which will improve the aesthetics of the area, provide a more conducive workspace for the employees of the Marketing Board and a more welcoming environment for customers. It will also help create new opportunities for entrepreneurs who wish to invest in the city centre. |
| Negative Impacts | Increased vibration and noise level during demolition works disturbing users of the market, bus terminal, residents and employees in nearby offices and businesses. |
| | Potential for increase road safety issues for pedestrians, particularly the elderly and children, the disabled, and motorists. |
| | Reduced air quality (dust and other construction material, in addition to fumes that may affect workers on the site, residents, vendors, bus operators and commuters and occupants of nearby offices) |
| | Increased waste generation. |
| | Potential for pollution of the marine resource. |
| | Traffic delays/congestion caused by road detours or closures during the demolition, especially for the buses using the bus terminal close to the project area. |
| | Limited or no access to certain areas of the site during demolition. |
| | Occupational safety and health risk to workers on the site as well as vendors in the market, the bus drivers and their customers, including sexual harassment and Gender Based Violence. |
| | Conflicts arising between the various users (vendors and their customers as well as bus operators and commuters) of the complex and the contractors' workforce. |
| | |

## 6.0 STAKEHOLDER CONSULTATION

Stakeholder consultation began on May 26, 2020 when the Social Safeguards Officer and Grants Manager visited the Castries Market Complex to meet with the users of the facility. During that visit discussions were held with thirty-six (36) regular users of the complex, the most likely to be affected by the proposed works, including provision, fish and coconut vendors, and vendors operating from huts and caravans on Jn. Baptiste Street, to find out their views on the proposed redevelopment of the Castries Market, in particular the construction of the Box Park (*see the tables in Appendix VII*). While the vendors were generally of the view that the market complex needed to be improved and many supported the initiative, their main concern was the effect that the works would have on their operations and their ability to continue to earn an income. The vendors indicated that they were not opposed to being relocated, but would prefer to move to a high traffic location to avoid a large decline in their daily sales and revenue. The fish vendors indicated that if relocation was mandatory, they would comply but due to the nature of their trade, they preferred to remain within the complex, during the construction as long as the hoarding is erected in a manner that would not affect patrons' access as was the case during the recent construction of the provisions market. Officers of the CCC also met with the vendors on Jn. Baptiste Street on January 19 2021 to continue discussions with the vendors about their individual needs, such as the condition of their structures, and the amenities that each vendor requires at the relocation site. The CCC Officers have planned another meeting for Tuesday 20 April 2021 to discuss the demolition further and to finalize the arrangements for the relocation with each vendor.

Since this initial consultation, the CCC has made a number of changes to the operations within the market complex. Firstly, all provision vendors with stalls are now accommodated in the new provision market, which is not fully occupied, and farmers and coconut vendors, operating from trucks and vans now vend from the Old Fire Station Ground, a more spacious area, which helps relieve the congestion in the market area during the current COVID-19 pandemic. The Design consultant has been informed of the concern of the fish vendors in regards to access by the patrons when the area is hoarded, and this has been incorporated into the plan for hoarding the site. Moreover, both the Design Consultant and the Project

Engineer propose that the demolition can be undertaken without the relocation of the Jn. Baptiste Street vendors, since there is sufficient space between the Marketing Board building and the area where the vendors' huts and caravans are located. Nevertheless, the Officers of the CCC have held a number of meetings with individual Jn. Baptiste Street vendors to discuss their eventual relocation in time for the construction of the Box Park. More information on these consultations/meetings will be provided in the ARAP for the construction of the Box Park.

While the demolition is planned for the slow business days of Saturday and Sunday, which means that the offices in the Government Buildings on the Castries Waterfront will be unoccupied, and the number of shoppers at the nearby Massy Supermarket greatly reduced, these stakeholders will nevertheless be formally informed of the date and time of the demolition at least one week prior, in order to alert their employees and customers to the works. The minibus associations will also be formally informed at least one week prior to the demolition so that the individual drivers can be informed. The CDC residents will be informed via printed notices and flyers, as well as announcements on radio, and television at least one week before the demolition, while a town crier, will be ultilised closer to the actual date of the demolition, to remind not only the residents, but all users of the market and the bus terminal. The nearby Carpark has not been operational since a fire caused substantial damage to the building last year, but management will be informed as building security may be on the premises during the demolition works.

Since the vendors in the market and on Jn. Baptiste Street are tenants of the CCC, the staff of the Council has been spearheading the direct consultation with the vendors. However, the ORTCP team has engaged the CCC at three meetings on January 15 and April 08 and 12 2021, to discuss the specific requirements for the demolition and the eventual relocation of the vendors in preparation for the start of works on the construction of the Box Park. CCC has been apprised of the consultative process required for the demolition as well as the relocation of the vendors, particularly the need to inform the PAPs of the GRM.

The contact information for the assigned Officer will be provided to the major stakeholders to allow them an easily accessible channel for expressing concerns about the demolition. A television and radio publicity drive will be used to keep users of the provision market and of the bus service, as well as the general public and more specifically persons in vulnerable groups such as persons with disabilities informed of the progress of the demolition activities as well as to promote the Grievance Redress Mechanism (GRM).

All consultation engagements will continue to be undertaken bearing in mind the existing Covid-19 situation where gatherings are limited to ten persons. Thus, consultations in small-group sessions of no more than ten persons will held utilizing social distancing protocol, and where possible, meetings will be conducted through platforms such as Zoom and Skype.

## 7.0 PURPOSE OF THE ESMP

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

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

- Environmental and social management should be fully integrated within the overall project management framework, directed towards achieving an environmentally sustainable project which meets its intended purpose, functions efficiently throughout its life, and results in minimal adverse environmental impact.
- Environmental and social management should not be considered as separate from other activities relating to preparation, implementation and subsequent operation of the project.
- Individual management/monitoring responsibilities and functions need to be clearly defined to ensure that there are no gaps which might prejudice environmental performance of the project.

- Procedures relating to environmental and social management should be formulated to cause minimum disruption to, and fully integrate with, other aspects of project management. The usual management structure, reporting systems and meetings should be used for environmental and social management.
- Successful environmental and social management requires a strong commitment at all levels of project management, and in all bodies concerned, if it is to achieve worthwhile results. Effective and timely liaison between the various relevant bodies is also vital.
- Environmental and social monitoring is a basic tool to provide information for decision-making by project management. It should be organised in a manner that facilitates the early recognition of potential problems, so that appropriate remedial action can be initiated before serious environmental damage, danger or inconvenience have been caused.

## 8.0 THE LEGAL AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL MANAGEMENT

**Table 2. 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 21of 2001 |
| Development Control Authority (DCA) | The DCA is made up of a government appointed Board of various professional interest and main technical government offices which also includes the Chief Engineer of the Department of Infrastructure or his representative. The Board of the DCA has the power to review and decide on development proposals that are brought to it by its technical secretariat, the Physical Section of the Ministry of 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.<br><br>Amendments to the 1971 Land Interim Development Control Act |

| | | |
|---|---|---|
| Ministry of Health, Wellness, Human Services, and Gender Relations | Through its Environmental Health Department, it has the responsibility for reviewing plans, monitoring and enforcing public health and sanitation regulations and practices, and promoting public awareness on matters relating to public health and the environment. These include practices that affect health such as food preparation, sanitation, solid waste management, liquid and solid waste disposal, dust and air pollution, water quality, some occupational health and safety matters. | Public Health Act of 1975 and attendant Regulations to present.<br>No. 10, 11, 12, 13, 14, 15, 16, 18, 20, 21, and 22 of 1978]: Public Health [Nuisances] Regulations.<br>Public Health [Offensive Trades] Regulations:<br>Public Health [Communicable and Notifiable Disease]<br>Regulations:<br>Public Health [Water Quality Control] Regulations:<br>Public Health [Apartment Houses, Guest Houses and Hotels]<br>Regulations:<br>Public Health [Swimming Pools] Regulations:<br>Public Health [Disposal of Offensive Matter] Regulations:<br>Public Health [Sewage and Disposal of Sewage and Liquid<br>Industrial Waste Works] Regulations |
| Pesticides Control Board (in the Ministry of Agriculture) | Pesticides Control Board in the Ministry of Agriculture and is responsible for monitoring the importation and use of various chemical substances. | The Pesticides and Toxic Chemicals Control Act 1975 |
| Saint Lucia Solid Waste Management Authority | A statutory authority with the responsibility for providing a coordinated and integrated systematic approach to collection, treatment, disposal, and recycling of wastes 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. However, the site at Vieux Fort is not currently operating. | The Saint Lucia Solid Waste Management Authority Act No 8 of 2004,<br>Amendment of No 10 of 2007 |
| Saint Lucia National Trust | The Trust is a statutory body established in 1975 and has responsibility for the conservation and management of buildings and objects of historical and architectural value as well as areas of natural and scientific importance. Because it is charged with protecting and promoting natural and | The Saint Lucia National Trust Act of 1975 |

| | | |
|---|---|---|
| | cultural heritage it manages sites such as the historical Pigeon Island National Landmark and the Maria Islands Nature Reserve. The Trust has developed the System Plan for Saint Lucia, and is also trying to document and preserve the Architectural Heritage of Saint Lucia. While the Trust is a referral agency for the DCA, it is also very vocal on matters where it believes the matter of national heritage or preservation is threatened. | |

## 9.0 ROLES AND RESPONSIBILITIES

**Ministry of Tourism (MOT) / Project Implementation Unit (PIU)**

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

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

- To spearhead the consultation process with the vendors and other tenants in the Market
- Publicising the Grievance Redress Mechanism.
- Grievance Redress Management.

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

## 10.0 RESPONSIBILITY FOR IMPLEMENTATION

The MOT will have responsibility for all social and environmental safeguards management. Other agencies, Ministries and Departments e.g. CCC, Environmental Health Department (EHD), Department of

Infrastructure (DOI), Physical Planning Department (PPD), Labour Department, Public Utilities Department) will have responsibility for monitoring based on their mandate and the day-to-day responsibilities of their respective institutions. As such, environmental management and monitoring of this project by the public sector will involve several bodies, each with its own statutory responsibilities or other traditional roles, and organisational structure. These bodies should work cooperatively, within a coordinated framework, if efficient and effective environmental management from the public sector perspective is to be achieved. The input of the following agencies should be co-opted as required to ensure improved coordination of public responsibilities in relation to environmental and social management and monitoring on this project:

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

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

## 11.0 TRAINING AND ENVIRONMENTAL AND SOCIAL AWARENESS

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

## 12.0 COSTS ASSOCIATED WITH ENVIRONMENTAL MANAGEMENT ACTION PLAN IMPLEMENTATION

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

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

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

**Table 3 ESMP Implementation Costs incurred by Contractor**

| **ESMP Activity incurring cost** | **Estimated cost (US$)** |
|---|---|
| Signage for vehicular and pedestrian traffic management (4 signs @ EC$ 1,200) | 4,800.00 |
| Traffic safety provisions (barriers, cones, lighting, etc.) | 1, 000.00 |
| Public announcements and communications with stakeholders | 3,000.00 |
| **Total** | **$8, 800.00** |

## 13.0 RESETTLEMENT AND RELOCATION ACTION PLAN

To facilitate the demolition, the Management of the Marketing Board has undertaken and completed the relocation of the retail business to a building within the Castries Market Complex, which is within sight and yards away from the former location. Operations began at the new location on April 07, 2021. During discussions with the Manager of the Marketing Board, he indicated that a publicity campaign using notice boards, flyers, radio and television announcements would be utilized to inform customers of the relocation. Additionally, since the reopening of the upgraded Provision Market last year, the CCC has engaged in the relocation of vendors who previously operated on the periphery of the Marketing Board building to the Market, and those who could not be accommodated at the Market, mainly because they sell provisions and coconuts from trucks and vans, to a more spacious area to ensure compliance with COVID-19 protocols.

## 14.0 MITIGATION MEASURES FOR THE DEMOLITION OF THE MARKETING BOARD BUILDING

The table 3 below details the potential direct and indirect, on-site and off-site environmental impacts associated with the demolition of the Marketing Board building:

**(a) Anticipated impacts during demolition and**
**(b) Recommendations to mitigate these impacts and enhancement measures, where applicable**

**Project Activity: Demolition of the Marketing Board Building**

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| 1.0 Improperly managed waste<br>• A health and safety hazard, caused by dust and sedimentation, to stakeholders who continue to use adjacent spaces. Increases in the silt load of drains resulting in impairment of drainage system function and adverse effects on marine life, and water quality because the site is in close proximity to the Castries Waterfront.<br>• Mud on roadways affecting traffic safety and inconveniencing users as the John Compton Highway and other minor roads run directly across from the site. Additionally, a number of bus stops operate in very close proximity to the site.<br>• Land and water pollution, public health hazards, landscape degradation and reduction in amenity value, arising from inappropriate/ inadequate solid waste disposal practices.<br><br>Quantities of waste generated are not expected to be large enough to significantly compromise landfill life, but efforts | 1. The contractor should take all reasonable steps to dispose waste appropriately through careful planning of the works.<br>- The contractor is to haul site-generated waste following legal requirements for proper containment of the waste, and disposal will be at the Deglos Landfill[1]. (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) All loads must be covered when leaving the site.<br>2. Solid waste will not be permitted to enter drainage systems and roadways thus the requirements for provision of adequate non-polluting worksite sanitary facilities including provision of a sufficient number of adequate waste receptacles across the site (including appropriate and accessible containment for worker food waste) and regular collection services provided by a licensed collector.<br><br>3. Ponding of water that may encourage mosquito breeding will be avoided. | **Owners of proposed disposal sites**, for approval of site use and guidance on intended after use *(prior to bidding)*<br>**Contractor**, for:<br>· incorporation of recommendations into work plan and costing *(bid preparation)*<br>· identification of potential spoil disposal sites and acquiring permits as needed<br>·implementation of recommendations (*throughout construction)*<br>**MOT** for approval of appropriate spoil disposal sites proposed by Contractor, after consultation with Environmental Health and Solid Waste Management Authority<br>**Supervisor**, for monitoring compliance of Contractor during implementation<br>**Environmental Health** and **Solid Waste Management Authority**, for monitoring in accordance with their mandate<br>**CCC**, for timely removal of items that may be redeployed in other locations. |

[1] Under the guidance and direction of the Project Engineer, the Contractor will develop the Waste Management Plan for Developments (WMPD) (see Appendix III for template) as mandated by the St. Lucia Solid Waste Management Authority and will follow all the guidelines in the WMPD and the ESMP for disposing of all waste at the Deglos Landfill.

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| should be made to minimize the quantum of waste disposed at the landfill. | | |
| 2.0 Contractor workforce and the public coming into contact with asbestos | (1) If asbestos is located on the project site, it shall be marked clearly as a hazardous material.<br>(2) If work has already commenced, all work in the area must stop immediately.<br>(3) An asbestos management plan must be prepared by the contractor and approved by the relevant local health and waste management authorities.<br>(4) Where possible the asbestos and its location must be appropriately contained and sealed to minimize exposure.<br>(5) The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust.<br>(6) Asbestos will be handled and disposed by skilled & experienced professionals using appropriate PPE (personal protective equipment) such as respirators and Tyvek suites.<br>(7) If asbestos material is be stored temporarily, the wastes should be securely enclosed inside closed containments and marked appropriately.<br>(8) Security measures must be implemented against unauthorized removal of asbestos from the site.<br>(9) No removed asbestos will be reused. | **Owners of proposed disposal sites**, for approval of site use and guidance<br>**Contractor**, for:<br>· incorporation of recommendations into work plan and costing *(bid preparation)*<br>· liaising with the responsible agency for the disposal and acquiring permits as needed<br>·implementation of recommendations<br>**MOT**, for ensuring that the contractor follows the necessary procedures<br>**Supervisor**, for monitoring compliance of Contractor during demolition<br>**Environmental Health** and **Solid Waste Management Authority**, for monitoring in accordance with their mandate. |
| 3.0 Noise and dust affecting:<br>· Adjacent properties in particular sensitive receptors, such as the government offices, businesses and residencies nearby.<br>· Road and side walk users (pedestrian and vehicular) workers, and vendors in the Castries Market and bus drivers on the various bus stands. | 1. The contractor to use best practices for the mitigation of noise and dust risk.<br>2. Utilize PPE and include in the *Occupational Health and Safety (OHS) Plan in Appendix IV*<br>3. To minimize the effects on institutions and other nearby businesses restrict use of specified equipment and tools based on noise levels.<br>4. There will be no burning of waste on site. All waste will be disposed at the SLSWMA landfill site at Deglos.<br>5. Effective measures will be taken to minimise nuisance when working close to the nearby roadway or the sea, including use of | **Contractor**, for:<br>· incorporation of recommendations into work plan and costings *(bid preparation)*<br>· implementation of Recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation<br>**Department of Infrastructure, Labour Department** and **Environmental Health** for monitoring in accordance with their legislation. |

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| | methods which minimise dust generation and a restriction on working hours.<br>6. Limit high vibration-causing activities to standard construction hours where possible. Any construction work proposed to take place outside of standard construction hours will be subject to a case-by-case approval process.<br>7. Implement measures to minimise noise and vibration transference where necessary, for example using squawkers for reversing vehicles, noise barriers, noise and vibration monitoring (if guideline targets may be exceeded).<br>8. Avoid use of vibratory rollers near sensitive areas.<br>9. Complete property pre-condition surveys before demolition begins, where properties may be affected by vibration-causing activities.<br>10. Use water trucks where possible, to tamp down dust, on site and surrounding roadways. | |
| 4.0 Water pollution, resulting in:<br>· Health impacts on persons who may come into contact with the water.<br>-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. | 1. The contractor will use best practices and take all necessary precautions for protection of the environment; and mitigation of land and water pollution.<br>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.<br>3. Storage for PPE to be provided where it is easily accessible in the event of emergency, but not in the chemical storage area.4. Appropriate emergency wash area to be provided.<br>4.Contractor should abide by Public Health Act of 1975 and Regulations, in the provision of sanitary facilities for workers on site.<br>5. Sewage will not be permitted to enter the drainage systems.<br>6. Contractor should prohibit the use of worksite pit latrines.<br>7. Requirements for provision of adequate non-polluting worksite sanitary facilities include provision of sufficient number of adequate toilet facilities on the site, connected to suitable treatment, or otherwise collected and disposed of. Toilet facilities are available within the Castries Market Complex and the | **Contractor**, for:<br>· incorporation of recommendations into work plan and costings<br>· implementation of recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation<br>**CCC, Environmental Health,** and **Fisheries**, for monitoring in accordance with their legislation. |

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| | Contractor can make arrangements with the CCC for use of these facilities.<br>8. All workers to be required to use these facilities. Workers who refuse are to be subject to dismissal. | |
| 5.0 Development of social friction between the contractor's workforce and the public. | 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.<br>2. A Grievance Redress Mechanism (GRM) will be established for the communities and workers which sets out the relevant dates, details of the complainant, the nature of the complaint, action taken, and other relevant details.<br>3. The contractor should take appropriate measures to ensure that the site is well secured in order to protect assets on site.<br>4. Contractor should develop and maintain a code of conduct for all personnel, including sub-contractors for site activities. | **Contractor** |
| 6.0 Health and safety hazards to the workforce arising from participating in an inherently dangerous occupation. | 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.<br>2. The standards and guidelines regarding health and safety shall be the draft Labour Code. The Factories Regulations (Cap. 106 of 1948) and the Occupational Health and Safety (OHS) Guidance should be developed as part of this plan and implemented by the contractor. The OHS guidance will include guidance to prevent the transmission of COVID-19 throughout the workforce.<br>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.<br>4. The contractor should provide personal protective equipment such as protective helmets safety boots, protective clothing, ear mufflers, dust masks, gloves etc. suitable for the activities being undertaken by the workforce, and makes it a condition of employment that these are worn when needed. The contractor should provide personal protective equipment to prevent the | **Contractor** |

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| | spread of Covid 19 and should ensure that employees use the equipment.<br>5. The contractor should convene at least one health and safety meeting with the workforce to reinforce safe work practices and expectations.<br>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.<br>7. The contractor should procure the requisite insurances.<br>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. | |
| 7.0 Environmental damage caused by the workforce. | 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:<br>- Train workers in environmental issues and measures to be taken.<br>- Designate an officer to supervise and ensure compliance with environmental obligations.<br>- incorporate environmental and other issues into the agenda of regular meetings with workers.<br>- 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.<br>- 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.<br>- Provide and enforce worker use of appropriate, accessible solid waste disposal facilities. | **Contractor** |
| 8.0 Damage to archaeological sites and protected areas.<br><br>8.1 Damage to cultural heritage. | 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.<br>2. Follow guidance in the Chance Find Procedures (CFP). | **Contractor**, for:<br>· incorporation of recommendations into work plan and costings *(bid preparation)* |

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| | | · implementation of Recommendations and approved Management Plans *(through construction)*<br>**Supervisor**, for monitoring compliance of Contractor during implementation<br>**MOT** for monitoring and referring to relevant agencies.<br>**Line agencies (National Trust, A & H Society, National Archives)** for monitoring in accordance with their legislation or mandate. |
| 9.0 **Traffic delays and road closures**, impacting:<br>· All road users (vehicular and pedestrian) originating from or traversing through the area<br>· Businesses and other sensitive receptors operating in the area | The Contractor shall ensure traffic and road safety during performance of works and:<br>1. Develop a traffic management plan (TMP) based on the Environmental & Social Best Practices Guidance in Appendix V<br>2. Full road closures and inordinate delays may be avoided if the following approach is used:<br>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;<br>b. Ensure proper traffic controls are in place in accordance with best practice and the *traffic management plan* (signage, personnel, and barriers).<br>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;<br>d. Ensure that emergency responders are kept abreast of the location of works and implications for traffic.<br>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);<br>f. if a road closure is unavoidable, plan this outside of peak traffic times;<br>g. For the purpose of uninterrupted traffic movement during the demolition, the TMP shall include: detailed drawings of traffic solutions by showing all bypasses, temporary roads, temporary | **MOT** for:<br>·support in implementation of public awareness campaign *(in advance of implementation in affected area).*<br>**Contractor**, for: incorporation of Recommendations into work plan and costings<br>implementation of recommendations and approved Management Plans<br>**Supervisor**, for: monitoring compliance of Contractor during implementation<br>**Consultant monitoring** compliance of Contractor during implementation |

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| | turns, necessary barricades, signalization/lighting, traffic signs etc.<br>h. Ensure signs in strategic parts of the site.<br>i. Install and maintain a sign on site which will clearly indicate the following information:<br>- Duration of demolition<br>-Name and contact address/telephone number of responsible personnel<br>-Name and contact address/telephone number of contractor<br>- Plan of public transport, for example, timetable, change of timetable<br>- Circulation plans, including zones of entry and exit, routes for towing of material, turnaround points, parking areas, zones of interlocking with other traffic roads etc.,<br>- Routes for pedestrians and vehicles,<br>- Traffic controls for each expected intervention, including illustrations of barriers, paths, signalization plan, warning signs etc.,<br>- Requirements for special vehicles, for example, those of large dimensions,<br>- Construction works paths (access, ramps, loading, unloading),<br>- Expected interaction of pedestrians and vehicles,<br>- Roles and responsibilities of persons on construction site regarding traffic management,<br>- Instructions on the procedures regarding traffic control, including urgent situations.<br>TMP should be monitored (responsibility of the supervision engineer) and audited to ensure effective implementation and to take into consideration any changes on construction site. All workers on construction site should get acquainted with the TMP. | |
| 10.0 **OSH impacts**, resulting in worker illness, lost work time, disability, chronic health issues, or death. | 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.<br>2. Comply with the Occupational Health and Safety (OHS) Guidance | **Contractor**, for:<br>· incorporation of recommendations into work plan and costing<br>· implementation of recommendations and approved Management Plans<br>Ensuring that Covid 19 protocols are followed. |

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| | 3. Follow Environmental & Social Best Practices<br>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.<br>5. All works will be carried out in accordance with the approved plans. | **Supervisor**, for monitoring compliance of Contractor during implementation<br>**Labour Department, Environmental Health** and **Department of Infrastructure**<br>for routine inspections, handling of complaints referred to them by MOT, general public or workers. |
| 11.0 **Public Health and Safety concerns**,<br>through:<br>· reduced air quality in the vicinity of the works, affecting road users and users of adjacent properties<br>· reduced safety of passage near the works for pedestrians and vehicles<br>. The Contractor and Supervisor treating employees differently because of gender, ability or ethnicity.<br>. Contractor employees engaged in harassment of the public, sexual and otherwise.<br>. Harassment among the contractor's personnel. | *1.* Apply the approved Traffic Management Plan.<br>2. Follow the Environmental & Social Best Practices Guidance for general safety and convenience of the public; and Emergency procedures to be instituted.<br>3. See also, recommendations in this Table for noise and dust.<br>(4) The GRM should be promoted among the contractor's employees and the general public, specifically the vendors at the market, the bus drivers at the terminal and the residents.<br>(5) Dissemination and Enforcement of the Code of Conduct.<br>(6) Sensitizing the workforce on the Code of Conduct.<br>(7) Follow guidance provided to prevent the spread of Covid-19. | **Contractor**, for:<br>· incorporation of recommendations into work plan and costings<br>· implementation of recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation<br>**Department of Infrastructure, CCC** and **Environmental Health** for routine inspections, handing of complaints referred to them by MOT<br>**The contractor and supervisor** for ensuring adherence to the Code of Conduct, promoting the GRM among the employees, and ensuring adherence to the St. Lucia Labour Code<br>**MOT** for promoting the GRM to the public and referring complaints to the Department of Labour as well as the Department of Gender Relations. |
| 12.0 Damage to landscape, cultural heritage,<br>And the coastal waters by:<br>· sedimentation from the works area spoil, and aggregate stockpiles;<br>· Pollution of the coastal waters from leaking equipment or accidental spills.<br>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<br>2.General requirements for protection of the environment<br>3.Mitigation measures during earthworks<br>4. Mitigation of noise and dust risks<br>5. Mitigation of pollution from solid, liquid waste and hazardous materials/wastes<br>6. Chance find procedure operationalized.<br>7. There must be no unnecessary clearing of natural vegetation.<br>8. Avoid the use of chemicals. | **Contractor**, for:<br>· incorporation of Recommendations into work plan and costings<br>implementation of recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation<br>**CCC, Department of Infrastructure,**<br>For monitoring in accordance with their legislation |

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| | 9. All recognized natural habitats, particularly the Castries Harbour, in the immediate vicinity of the activity must not be damaged or exploited. | |
| 13.0 Improper storage of construction materials and parking of plant and vehicles, which may create a hazard for the users of the project area, particularly the minibus operators, vendors, residents and the users of services in the area. | 1. No parking or stockpiling of materials will be allowed along the accessways or in areas that would impede the movement of the users of the area.<br>2. No materials shall be stored so that they encroach on, or in any way adversely affect the operations of users of the project area.<br>The contractor should plan for the temporary storage of construction materials and wastes, and the parking of construction plant within the worksite only. This will be part of the Site Management Plan. | **Contractor**, for:<br>· incorporation of recommendations into work plan and costing<br>· implementation of recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation |
| 13.1 Impedance of access to/from lands adjacent to the worksite. | 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.<br>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.<br>3. Identifying and preparing for the use of alternative access routes by users of the project site. | **Contractor**, for:<br>· incorporation of recommendations into work plan and costing<br>· implementation of recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation |
| 13.2 Interference with traffic due to disposal of demolition and construction wastes, and other wastes. | 1. Contractor should abide by all solid waste regulations in the disposal of demolition waste.<br>2. Public roads will be kept free and clear of wastes.<br>3. Contractor should erect appropriate signage in the vicinity of the site to warn other road users of construction traffic.<br>4. Contractor should consult Transport Board and the Traffic Department of the Royal St. Lucia Police Force early for approval and advice if there is likely to be any traffic disruption. | **Contractor**, for:<br>· incorporation of recommendations into work plan and costing<br>· implementation of recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation |
| 13.3 Increased road safety hazards and inconvenience to road users and the general public caused by the construction traffic/works interfering with normal traffic flow. | 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.<br>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. | **Contractor**, for:<br>· incorporation of recommendations into work plan and costing<br>· implementation of recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation |

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| | 3. Construction vehicles will be licensed in accordance with Transport Board stipulations. | |
| 13.5 Damage to existing road pavements and structures caused by overloaded haulage traffic. | 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.<br>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.<br>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.<br>3. Contractor should consider location in his selection of suppliers, to minimise haul distances to site.<br>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.<br>6. Contractor should comply with speed restrictions imposed by the relevant authorities.<br>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.<br>8. Contractor should be responsible, at his own cost, for cleaning up spillages or shed loads without undue delay.<br>9. Contractor should minimize quantities of mud tracked onto the public roadways, and conduct haulage preferably during dry periods.<br>10. 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. | **Contractor**, for:<br>· incorporation of recommendations into work plan and costing<br>· implementation of recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation |
| 14.1 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 | **Contractor**, for:<br>· incorporation of recommendations into work plan and costing |

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| | consultation with/under the supervision of, the relevant authorities. | · implementation of recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation |
| 15.0 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.<br><br>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.<br>3. All material to be stockpiled within the worksite will be kept clean and free of mud, soil and other materials.<br>4. Access roads will be regularly swept.<br>5. Contractor should minimise quantum of mud and dust tracked onto public roadways from the site.<br>6. Selection of aggregate sources will minimize haul distances to site, and disruption to other road users.<br>7. All construction waste taken off site and aggregate brought onto the site will be covered by a tarpaulin to minimize dust emissions.<br>8. Contractor should not stockpile material along the public roadway. | **Contractor**, for:<br>· incorporation of recommendations into work plan and costing<br>· implementation of recommendations and approved Management Plan<br>**Supervisor**, for monitoring compliance of Contractor during implementation |
| 15.1 Creation of noise nuisance and air pollution caused by haulage vehicles/ construction plant and machinery operation. | 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.<br>2. Operations will be carefully designed, including selection of haulage routes within the site and location of stockpiles.<br>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. | **Contractor**, for:<br>· incorporation of recommendations into work plan and costing<br>· implementation of recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation |

| Potential Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|
| | 4. Noise specifications for construction equipment will be stipulated in accordance with Labour Department standards for the occupational environment.<br>5. Internal combustion engines will be fitted with silencers.<br>6. Records of complaints will be kept. | |
| 15.2 Increase in emissions of ozone-depleting substances (ODS) | 1. Contractor should select alternative materials and/or technologies to minimise the use of ODS within the property. | **Contractor**, for:<br>· incorporation of recommendations into work plan and costing<br>· implementation of recommendations and approved Management Plans<br>**Supervisor**, for monitoring compliance of Contractor during implementation |
| 15.3 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. | 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.<br><br>2. Lands beyond the boundaries of the worksite will not be used by the contractor for any purpose, unless he has the pre-approval of the relevant statutory authorities. Any such site shall also be properly cleared and remediated upon works completion. | **Contractor**, for:<br>· incorporation of recommendations into work plan and costing *preparation)*<br>· implementation of recommendations and approved Management Plans *(through construction)*<br>**Supervisor**, for monitoring compliance of Contractor during implementation *(Continuous through construction).* |

**14.1 Natural Disaster Mitigation and Environmental and Social Management**

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

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

**Table 4 – Natural Disaster Environmental and Social Management Plan**

| Natural Disaster | Environmental Impacts | Mitigation Measures Recommended | Responsibility Timing and Frequency |
|---|---|---|---|
| 1. Hurricane | 1. The risk of upended equipment from winds.<br><br>2. The risks of flooding from storm surge. This can cause flooding. In construction areas, toxic chemicals, like paint, gasoline and cleaning agents, are common, and flooding transport them to other areas.<br><br>3. Increased risk of flooding from extreme rainfall. | 1. Construction sites should never be occupied during a hurricane. The risk of injury to crew members is too high, so when a hurricane is approaching, work needs to shut down, and workers should be sent home.<br><br>2. Move long-term material storage away from areas prone to flooding. Material in flood areas will be damaged, and chemicals will leach into flood waters and hurt the surrounding communities. Store material above ground level if possible and away from high flood zones.<br><br>3. Create two teams, the Hurricane Response Team and the Hurricane Recovery Team. The Response Team will know how to prepare for the hurricane event, while the Recovery Team will be trained on how to deal with the aftermath of a storm.<br><br>4. Have a list of supplies and materials. Should something be damaged or go missing after a hurricane, having a list of the major material on site will help with identifying missing inventory.<br><br>5. Reduce the amount of accumulated debris and scrap metal on site. These can exacerbate flooding and can also easily become windblown hazards in a | **The Contractor-** assistance can be sought from NEMO as well as the DOI. |

| | | | |
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| | | hurricane, so eliminating them before the storm will help protect the job site and the surrounding community. Scrap that cannot be eliminated should be tied down and stored more securely or placed in a sealed dumpster.<br><br>6. Empty dumpsters before the storm hits. When a storm is approaching, empty all dumpsters. If they cannot be emptied in time, have them covered with nets to prevent the contents from turning into hazards.<br><br>7. Anchor or remove barricades and loose buildings like portable toilets. Barricades are easily picked up by the winds of a hurricane. Non-essential barricades should simply be removed during the storm. Essential ones should be properly anchored to reduce this risk.<br><br>8. Protect other large equipment from the storm. Top off fuel tanks, anchor lighter pieces of equipment and protect valuable equipment from flying debris.<br><br>9.Secure building framework. Banding, concrete fill, and heavy structural steel components can help keep building frameworks in place during a hurricane. When this isn't possible, remove the frameworks to prevent damage.<br><br>10. Protect the site from flooding, sandbags, and other similar products can help prevent some of the flooding associated with hurricanes.<br><br>11. Have a relocation plan for equipment. Large equipment like excavators can be damaged in a hurricane if your site is in the storm's path, so whenever possible, relocate costly equipment to higher or protected ground.<br><br>12. Have a system in place to notify the on-site crew when it is safe to return. Make sure the team knows when they should report back to work. Have a safety inspection crew ready to see the site, and a system in place to contact crew members so they can return to work only when it is safe to do so.<br><br>13. Establish an off-site place to meet. There may be a need to meet to discuss restoration after a hurricane. Establish an off-site place where the Hurricane Recovery Team can meet to discuss what needs to happen next. | |

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| | | 14. Use caution when assessing damage because of potential post-storm hazards. A construction site will have numerous hazards after a hurricane including toxic water, jagged debris, and unstable buildings. After getting the all-clear to return to the site to assess damage, crews must use extreme caution.<br><br>15. Have a plan for water removal. Water removal is one of the first and most important things to tackle after a hurricane. Water can not only damage the materials on the site, but it can also soften the ground, which hurts the structural stability of the project. Water needs to be emptied onto a street that has a stormwater system or pumped into tanker trucks to be hauled off-site safely.<br><br>16. Initiate salvage activities quickly. Sort out the damaged and undamaged materials, cover all equipment that has become exposed due to the storm, check for leaking gas lines, check for downed power lines, and ensure fire protection systems are restored to the property as quickly as possible to avoid additional damage and expense. | |
| 2. Earthquakes | 1. Ground displacement can cause uneven surfaces. Be aware of this when entering the construction site and preparing for repairs after an earthquake.<br><br>2. Fire is a serious risk. Broken power and gas lines leave the site vulnerable to fire.<br><br>3. Flooding is possible near waterways. Broken dams or levees can allow flooding in normally safe areas.<br><br>4. Buildings can topple in an earthquake. This includes buildings that are not yet complete, and some construction projects will be at | 1. Have a safe place designated on the construction site for earthquakes. . Aim to be away from the building, which could collapse, and away from any large equipment. Remember that most accidents after an earthquake happen within 10 feet of the building, including construction site buildings. However, try not to move too far from your current position, as the farther someone moves during an earthquake event, the greater the chance of injuries.<br><br>3. Practice “Drop, Cover, and Hold On”. Drop, cover, and hold on is an earthquake safety measure that anyone can practice, regardless of where they are when an earthquake hits. It refers to dropping to hands and knees, covering your head and neck with one arm and crawling to the closest shelter, then holding on to something steady until the shaking stops. Finding shelter is the challenge during an earthquake on a construction site, but even a large piece of equipment or a tree can serve as a shelter when needed. It is recommended to practice this technique at the start of construction. | The Contractor- assistance can be sought from NEMO as well as the DOI. |

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| | higher risk because their earthquake protection measures may not be completed. | 4. Hold earthquake drills to ensure that construction crew members know the proper response during an earthquake- This is a key preparation step because, in the chaos of the moment during an earthquake, people may experience moments of panic. Preparing ahead of time, can help prevent injury during an earthquake.<br><br>5. Watch for fires- Broken gas lines, even near construction sites, and damaged electrical components or electrical lines can cause fires. Also, the motion of the earthquake itself can release sparks, leading to a fire.<br><br>6. Keep an earthquake emergency supply kit on hand to protect those on the site.<br><br>6. If operating equipment when an earthquake hits, stop and exit the vehicle as soon as safely possible- It is difficult to control equipment and vehicles during an earthquake, and they can be deadly.<br><br>7. Know that after the shaking stops, there is always a possibility of aftershocks. For that reason, do not return to the site or work until you are confident all risk has passed.<br><br>8. If there is a clear path away from the construction site, exit as quickly as possible after the shaking has stopped. A construction site is not somewhere to be during aftershocks, so encourage the entire work crew to get away quickly for their safety.<br><br>9. If an aftershock hits, the area will be still recovering from the damages of the first quake. This means that the infrastructure could be weakened and not prepared for additional milder shaking, and the risk of a damaging collapse is higher.<br><br>10. Only enter the site to assess damage after all risk of aftershock has passed. Stay in contact with emergency personnel on an emergency radio to learn what is recommended.<br><br>11. If trapped, find something to tap to help rescue crews find you. Rescue crews are trained to listen for tapping on pipes or whistling, so use these tools to ensure you can be safely found. | |

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| | | 12. Wear protective clothing during clean-up. Long sleeves, heavy boots, and work gloves can protect you from damage from sharp objects that were dislodged during the shaking. | |
| Floods | 1. **Pollution-** Floods will wash chemicals and sewage into the water. The contaminated water will spread quickly over an area causing public health issues and killing fish.<br><br>2. **Loss of life-** Floods can cause death and injury. Workers can get trapped in buildings by the quick rising waters.<br><br>3. **Property-** As flood waters rise, they can flow into low-lying properties. The water will deposit huge amounts of debris and silt that will destroy floors, walls and any electrical gear. | 1. Identify any risks based on the site location. If the site is near water, ascertain whether there is natural drainage, if not identify if there is a way to add drainage. Use flood maps to assess this risk, then take measures to ensure the area can properly drain when needed.<br><br>2. Understand the impact of sediment runoff. Often in construction, the contour of the land is important to the construction project. When sediment runoff occurs, defining property boundaries can become difficult. Also, the grading that has occurred to make the building project possible will be damaged.<br><br>3. Have a plan to protect equipment and personnel if the site floods. Creating a site flooding plan if the site is at risk for a flood will save lives and money.<br><br>4. Assess the materials that will be damaged by flood waters. Steel construction material may be fine if it gets wet. Plasterboard or composite wood will be damaged. If a flood is coming, elevate those materials that need to be kept dry. If a flood occurs without warning, dispose of damaged material before moving on with the project.<br>5. Build portable barriers to prevent flood damage. Gates or flood walls and even sandbags can all help reduce the risk of financial damage and loss from flooding at a construction site.<br><br>6. Store electrical and mechanical equipment above projected flood heights. If there is a flood warning, make sure electrical and mechanical equipment is stored above the flood water's expected level.<br><br>7. Understand the risk of contamination from chemicals. Flood water can be contaminated with chemicals that are stored on a construction site, and this puts the surrounding community at risk. | The Contractor- assistance can be sought from NEMO as well as the DOI. |

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| | | 8. If a flash flood warning is issued, evacuate the area. Flash floods can kill in an instant, so take these warnings seriously. Even construction equipment is not safe from flash floods.<br><br>9. Flood water is not safe, hence, never wade in flood water on a construction site, because of the high risk of contamination, and the accumulation of debris which can cause injury. Wait until the water recedes or have it drained properly before entering the construction site to assess the damage. | |

**14.2 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.

## 15.0 GRIEVANCE REDRESS MECHANISM

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

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

• Does the project have clear, formal, and transparent internal mechanism

(e.g.) a grievance redress unit, grievance redress committees, designated grievance redress officers) and rules for addressing grievances?

• Do project officials responsible for grievance redress have the authority to take or demand remedial action?

• Are officials responsible for grievance redress obliged to take action on all grievances?

• Do project-affected people feel that they can lodge grievances without fear of retaliation?

• Are project beneficiaries aware of their right to file a grievance and of the grievance redress process in general?

• Are there internal processes in place to record, track, and monitor the grievances and the action taken on them?

• Does the GRM provide timely feedback (written or otherwise) to the petitioner on actions taken?

• Is there an appeal process in place that GRM users can access if they are not satisfied with how their grievance has been resolved?

**During the demolition, all grievances pertaining to the project would be managed by an officer assigned by the PS Ministry of Tourism. The SE identifies the problem area, then in collaboration with other support staff or/ and consultant, addresses the grievance as follows:**

- All grievances received, 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 Permanent Secretary of the Ministry of Tourism. The grievance notes should be signed and dated by the aggrieved person.

The Project Coordinator or another assigned Officer, 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, Ministry of Tourism. Copies of the complaint shall be sent to the PS for tabling within five business days following communication.
- If an agreement cannot be reached the aggrieved party or parties shall raise their concerns to Permanent Secretary, 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 | Grievances made verbally to the assigned Officer in person at stakeholder engagement meetings or to the Contractor's personnel.<br><br>By email to the following address- psmot@gosl.gov.lc<br><br>By letter, addressed to the: Permanent Secretary<br>Ministry of Tourism, Information &<br>Broadcasting, Culture & Creative Industries<br>Sir Stanislaus Building<br>The Waterfront<br>CASTRIES<br>By phone at number 468 5816 / 468 4610<br><br>Or call, text or WhatsApp to 721 9678, |
| Access Point | • The MOT serves as the access point for grievances |
| Grievance Log | • Grievances received verbally are documented, verified and signed by both parties.<br>• Grievances will be copied to the relevant authority |
| Assessment | • Grievances categorized by type. Determination of eligibility of grievance.<br>• The first assessment of the grievance is conducted by the assigned officer and technical officers from the pertinent GOV authorities.<br>• Letters acknowledging the grievance is issued by the Permanent Secretary, MOT.<br>• 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 PS MOT immediately when received. Should a dispute arise, the applicable Laws of Saint Lucia will prevail. |
| Resolution and Follow-up | • Development of an Implementation Plan for resolution of grievances including timeframes in which each step is completed as stated above in in the section on processing grievances. |

**Communicating a Grievance**

**(i)** Who can submit a Grievance?

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

**(ii)** How is the Grievance Communicated?

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

By email to the following address- psmot@gosl.gov.lc

By letter, addressed to the: The Permanent Secretary
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);

**Addressing Gender-Based Violence**

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

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

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

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

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

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

**Promoting GRM Awareness**

The Grievance Redress Mechanism (GRM) will be promoted through a public sensitization campaign which will include stakeholder engagement meetings and communication with stakeholders via email, WhatsApp and bulletins or flyers. The general public will be informed through public announcements through various media including the Government Information Service and website, television and radio announcements. All communication will provide contact information for the assigned 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.

## 16.0 APPENDICES

**Appendix I – GRM Form**

# GOVERNMENT OF ST. LUCIA

## 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, Grievance Redressal Procedure of the Ministry of Tourism, 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.*

**Appendix IV: Occupational Health and Safety (OHS) Plan**

**Appendix V: Environmental & Social Best Practices Guidance**

**Appendix VI:– Covid-19 National and International Health and Safety Guidelines**

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

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

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

   This includes but is not limited to:

   - Hard hats
   - Footwear
   - Gloves
   - Safety goggles
   - Coveralls
   - Dust mask or respirators based on the activities and the exposure. (respiratory protection is mandatory for all at the construction site)

2. Avoid close contact with other co-workers (6 feet distance).

3. Train workers in the proper use of personal protective equipment.

4. Ensure that employees use PPE at all times while performing duties. Employees shall not be allowed on the site without the necessary PPE.

5. Ensure fall protection measures (nets, scaffold) are in place for work at heights. Where collective fall protection measures are not possible, persons working at heights shall be provided with the appropriate fall arrest/restraint equipment such as harnesses.

6. Scaffolds **must** be erected and inspected by competent person(s) and the results recorded.

7. All work equipment, plant and machinery are to be maintained in a safe condition and inspected regularly before use. All tools and machinery shall be properly guarded and protected.

8. Appropriate first aid devices must be provided on site.

9. Portable drinking water must be provided on site and easily accessible by all employees.

10. Access to washroom and handwashing facilities or hand sanitizers.

11. Workers with flu symptoms should be removed from the work site and must receive medical attention.

12. Report all occupational accidents to the Department of Labour as stipulated in Section 246 of the Labour Act; that is within seventy-two (72) hours, however in the case of death, immediately.

13. Ensure systems are in place for consultation with workers on safety, health and welfare matters.

14. Encourage workers to report any safety and health concerns.

15. Approval will be granted by the Labour Department upon submission and review of the relevant documentation, plans and previous inspections where applicable.

16. Submit occupational safety and health plan/policy to the Department of Labour.

17. Pay particular attention to the provisions of the following Sections of the Act:
    256 - Duties of employers at construction sites
    257 - General Duties of employers
    260 - General Duties of employees
    261 - Duties of owners at construction sites

18. Adherence to all directives and guidelines from Chief Medical Officer.

19. The Department of Labour reserves the right to halt all activities at any site where there is a failure on the part of any party to comply with the stipulated guidelines.

COVID-19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS

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

(a) ASSESSING WORKFORCE CHARACTERISTICS: Many construction sites will have a mix of workers e.g. workers from the local communities; workers from different parts of the country; and even workers from other countries. Workers will be employed under different terms and conditions and be accommodated in different ways. Assessing these different aspects of the workforce will help in identifying appropriate mitigation measures:

• The Contractor should prepare a detailed profile of the project work force, key work activities, schedule for carrying out such activities, different durations of contract and rotations (e.g. 4 weeks on, 4 weeks off).

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

• Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.

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

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

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

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

• Providing cleaning staff with adequate cleaning equipment, materials and disinfectant.
• Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.

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

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

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

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

• Training medical staff, which should include current WHO advice on COVID-19 and recommendations on the specifics of COVID-19. Where COVID-19 infection is suspected, medical providers on site should follow WHO interim guidance on infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected. • Training medical staff in testing, if testing is available.
• Assessing the current stock of equipment, supplies and medicines on site, and obtaining additional stock, where required and possible. This could include medical PPE, such as gowns, aprons, medical masks, gloves, and eye protection. Refer to WHO guidance as to what is advised (for further information see WHO interim guidance on rational use of personal protective equipment (PPE) for COVID-19).

• If PPE items are unavailable due to world-wide shortages, medical staff on the project should agree on alternatives and try to procure them. Alternatives that may commonly be found on constructions 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).

**Appendix VII: Report on Consultations held with Vendors in the Area Earmarked for the Construction of the Box Park**

## Vendors who operate to the front and side of the St. Lucia Marketing Board

| Name | Gender and Age Range | Years on Site | Type of Goods Vended | Frequency on Site | Assets and Value | Average Daily Income XCD | Notes |
|---|---|---|---|---|---|---|---|
| 1. Elijah Louis | Male 33 | Over 15 years | Coconuts | Monday – Saturday 6:00 am – 5:00 pm | Crates Cooler ($800.00) | $1500.00 | Employs at least 6 assistants, who assist with tasks such as picking the coconuts, pushing a cart to sell the coconut, cutting the coconuts and bottling the water. Sells on average 800 coconuts a day, and would prefer to remain close to the market which is a high traffic area. |
| 2. Wayne Mathurin | Male (35 yrs) | 1 and a half years | Coconuts | Monday to Sunday | Trays, coolers $2500.00 | $100.00 | Has 1 assistant and his preferred relocation site is the Gros Islet Bus stop. |
| 3. Shervon Lionel | Male (40 yrs) | 6 years | Coconuts and provisions | Sunday to Thursday | Truck | $800.00 | Has at least 4 assistants. |
| 4. Martha Fevrier and Harold Fevrier | Female (68 yrs) Male (71 years) | 43 yrs 10 yrs | Vegetables and seasonings Coconuts | Tuesday and Friday Tuesday | Vehicle | $100.00 $200.00 | Farmers who sell their produce. |
| 5. Sherwin Antoine | Female (32 yrs) | Over 10 yrs | Provisions, vegetables and fruits | Monday – Friday | Vehicle and tray | $600. 00 | The items are purchased and then resold. |

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| and Lorina Eugene | Female (48 yrs.) | Almost 20 yrs | | 6:00 am – 5:00 pm | | | |
| 6. Alfred Gerald | Male (54 yrs) | 1 year | Provisions and fruits | Tuesday. Friday and Saturday 8:00 am – 1:00 pm | Sells from the back of a van | $800.00 | Is a farmer who sells his produce with the help of an assistant. Would like to remain close to the provision market |
| 7. Ina Julien | Female (64 yrs) | More than 5 years | Provisions, fruits and vegetables | Tuesday and Friday 9:30 am to 5:00 pm | Sells from a van | $300.00 | Is a farmer and sells her crops. Wants a location that will generate sales. |
| 8. Anonymous | Male (57 years) | More than 10 years | Provisions and fruits | Tuesday, Thursday and Saturday 7:00 am- 2:00 pm | Sells from a vehicle | $200.00 | Is a farmer who sells his produce. Is disgruntled as he was recently relocated from upper Jeremie Street to his present location. |
| 9. Melissia Bernard and Albert St. Cyr | Female (40 yrs) Male (47 yrs) | Over 15 years | Provisions, fruits and vegetables | Monday to Saturday 7:00 am- 2:00 pm | Sells from a vehicle | $1000.00 | Does farming as well and sells their produce. |

## Vendors who operate from huts and caravans on Jn. Baptiste Street

| Name | Gender and Age Range | Years on Site | Type of Goods Vended | Frequency on Site | Assets and Value | Average Daily Income XCD | Notes |
|---|---|---|---|---|---|---|---|
| 1. Anastasia Joseph 719 1462 | Female 50 (years) | 3 yrs | Meals | Monday – Saturday 6:00 am – 12:00 noon | Food truck $8000.00 | Before COVID 19 $1000.00 During pandemic $350.00 | Vends from a rented food truck. |
| 2. Nicholas John Joseph 486 2375 | Male 63 years | 20 yrs | Vegetarian Meals | Monday – Saturday | Food hut | Before COVID 19 $1000.00 During Pandemic $300.00 - $400.00 | |
| 3. Samantha Moise | Female 46 years | 20 yrs | Local juices, water, snacks | Monday-Saturdays | Vending hut $7000.00 | $150.00 | Thinks that existing vendors should be given first priority when market development is complete. |
| 4. Andy Kerr / Cindi<br>Tel:717 1640 | Female 55 years | 14 years | Drinks and food | Monday-Saturday 9:30 am to 5:00 pm | Food hut $20,000.00 | before COVID 19 $140.00 During pandemic $90.00 | Has no particular preference for relocation but wants a location that will generate income. |
| 5. Larry Alfred<br>Tel:713 0682 | Male 41 years | 9 yrs | Vegetarian foods and beverages | Monday – Friday | Food hut $15,000.00 | $200.00 before COVID During pandemic $90.00 | Relocation to an area that is comfortable. |

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| 6. Alleyne Guillete Milton Guilette<br><br>Tel:584 6518<br>714 9600 | Female 39 years Male | 14 yrs | Restaurant food and drinks | Monday – Saturday | -- | --- | --- |
| 7. Antonio Laurencin<br><br>Theodosia Laurencin<br>384 2080<br>717 0225 | Male<br><br>Female 51 years | 20 yrs | Dry goods and grocery items | Monday - Saturday | Hut | $900.00 before COVID 19<br>During Pandemic $300.00 | Information provided by Theodosia.<br>Preferred location closer to the provision market |
| 8. Melita Ashford 722 2941 | Female 38 years | 4 yrs | Full hair and nail salon. Sells products and drinks. | Monday – Saturday | $80,000.00 | $350.00 before COVID<br>During pandemic $150.00 | Has no preference for relocation but wants a place that is secure, as her business has been burglarized in the past. Does not want to be to the front of the Conway area. |
| 9. Tracey Edmund 719 5069 | Female 45 years | 14 yrs | Full hair salon | Monday – Saturday | $60,000.00 | $350.00 before COVID<br>During pandemic $100.00 | Would prefer to remain as near to the current location as possible<br>719 69 |
| 10. Nelista Raynald 716 3917 | Female | 10 yrs | Convenience Shop | Monday – Saturday | | | |
| 11. Euralis Joseph 713 0571 | Female | Restaurant | | Monday-Saturday | | | Operates from wooden caravan |
| 12. Francis Pamphile | Male | Beverages and snacks | | Monday – Saturday | | | Operates from wooden hut |

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|---|---|---|---|---|---|---|---|
| 519 7099 | | | | | | | |
| 13. Thecla | | | | | | | |
| 14. Marilyn | | | | | | | |

## Fish Vendors

| Name | Gender and Age Range | Years on Site | Type of Goods Vended | Frequency on Site | Assets and Value | Average Daily Income XCD | Notes |
|---|---|---|---|---|---|---|---|
| 1. Dave Jules<br>Tel:461 6730 | Male 34 years | 20 yrs | Fish | Sunday – Saturday 6:00 am – 12:00 noon | Fish vending cart | $215.00 | Wants to remain in the city centre, preferably close to Dilly's Supermarket. |
| 2. Cliff Taliam<br>Tel: 717 4523 | Male 34 years | 12 yrs | Fish, cigarettes, plastic bags | Monday – Saturday | Fish vending cart | $250.00 | |
| 3. Pirate | Male 53 years | 39 yrs | Fish | Sunday-Saturday | Fish vending cart | $350.00 | Preferred relocation site is the grounds of the Old Fire Station, however, electricity and water should be provided. |
| 4. Ignatius Henry | Male 54 years | 20 years | Fish | Monday-Saturday | | $250.00 before COVID-19<br>During pandemic $100.00 | Would prefer to remain close to the provision market, and the provision of electricity and water need to be considered. |

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| 5. Kevin Larcher | Male 40 years | 8 yrs | Fish | Monday – Saturday | Fish vending cart | $200.00 before COVID-19 During pandemic $90.00 | Prefers to be relocated close to the sea. Provision of electricity, water, garbage bins, drainage for fish water and fish scraps. |
| 6. Oslan Octave | Male 52 years | 14 yrs | Fish | Monday – Saturday | 2 Freezers | $80.00 | Has no preference for relocation. |
| 7. Markson Louison | Male 28 years | 10 yrs | Fish | Sunday - Saturday | 2 Freezers | $150.00 | |
| 8. Moore St. Louis | Male 56 years | 20 yrs | Fish | Sunday – Saturday | 2 Freezers | $350.00 before COVID During pandemic $150.00 | Relocation close to the sea or near the Fisheries Cooperative. |
| 9. Orin October | Male 57 years | 22 yrs | Fish | Monday – Saturday | 2 freezers Tools | $600.00 | Sells from stall #7 of the Camillia Alexander Fish Vending Market. The monthly rental is $350.00 but has not paid for sometime because the facility is in poor condition. |
| 10. Paul Loctor | Male 78 years | 5 yrs | Fish | Monday-Saturday | 2 freezers | $300.00 - $400.00 | Sells from stall # 4 of the Camillia Alexander Fish Vending Market. Sales was greatly affected during the reconstruction of the Castries Provision Market because a barrier was erected which blocked off an access which was frequently used by customers. Generally sells very little during the week. |
| 11. Cuthbert Francis | Male | 10 yrs | Fish | Monday - Saturday | 1 freezer, scales | $500.00 | Sells from stall # 1. Has one helper who carries fish from the boat to |

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| | | | | | | | the stall. Would like a quality workspace which is air-conditioned. Has not paid the $350.00 monthly fee because of the deplorable condition of the facility. |
| 12. Carol James | Female | - | Fish | Monday-Saturday | 2 freezers, scales | $600.00 - $1000.00 | Assistant Earl Phillip provided the information. Sells from stall #2. |
| 13. Andre | Male Middle age | - | Fish | Monday-Saturday | 1 freezer | $200.00 | Sells from #6 but also sells from a vending cart in the yard of the facility. Believes that his sales were affected when the access was blocked during the reconstruction of the Castries Provision Market. |