



ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN OLD TRAFFORD COMPLEX, SOUFRIERE

Ministry of Tourism, Information and Broadcasting,
Culture and Creative Industries
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ACRONYMS AND ABBREVIATIONS

BOQ	Bill of Quantities
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
SSC	Soufriere Constituency Council
SSO	Social Safeguards Officer
SLSWMA	St. Lucia Solid Waste Management Authority
SMMA	Soufriere Marine Management Area
PC	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. INTRODUCTION

The Ministry of Tourism, Information and Broadcasting, Culture and Creative Industries is currently implementing the OECS Regional Tourism and Competitiveness Project (ORTCP) - a six-year tourism development project, which commenced in August 2017. The Project is funded by the World Bank as a regional initiative that is concurrently being implemented in Grenada and St Vincent and the Grenadines by their respective national governments.

The original objectives of the Project were to: (i) facilitate the movement of tourists within the participating countries using ferries; (ii) improve selected touristic sites; and (iii) strengthen implementation capacity for regional tourism market development in the participating countries.

Those three Project Development Objectives constitute the three main Project Components. However, the ORTCP has been restructured to achieve the ultimate aim to: improve selected tourism sites and strengthen capacity to contribute to the recovery from Covid-19. The Ministry of Tourism in close collaboration with the Office of the Prime Minister has strategically identified some key sites for enhancement, with a view to enhancing the competitiveness and sustainability of Saint Lucia's tourism sector. The development of community-based tourism in the town of Soufriere is among several initiatives planned which closely align with the underlying premise of the 2020 Saint Lucia Tourism Strategy (developed under the ORTCP) which focuses on **balancing visitor value and diversifying the product towards a more appealing stayover prospect**. This activity was included following the restructuring in an effort to achieve the above Project Development Objective. Moreover, it is envisaged that this initiative will contribute significantly to boosting the resilience of the tourism sector, as the Ministry prepares for the resurgence of this vital sector.

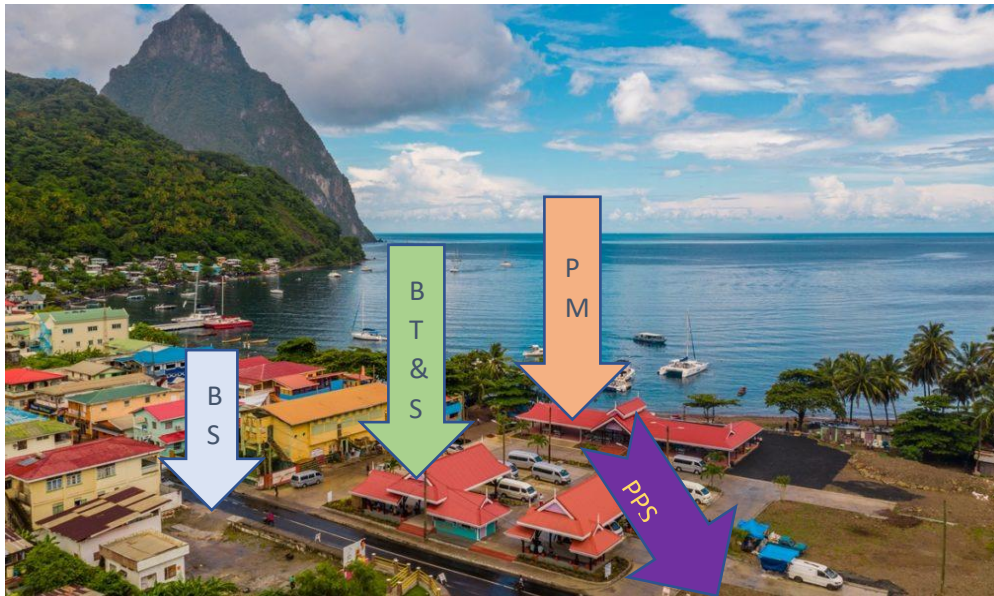
2. PROPOSED SCOPE OF WORKS

The proposed activity for the Old Trafford Complex Upgrade, will be the construction of a building measuring 30' x 12' and 360 square feet, to house two (2) concessionaires' booths, to serve as an ice cream parlour and dry goods outlet. The building will be 12 feet high with an additional section of roof three (3) feet high for a French Architecture finish. The foundation will consist of blockwork with a concrete slab. The superstructure will be 1"x8" Shiplap Boarding with Color Coated Roof Sheeting.

3. PROJECT SITE

Soufriere is the district with arguably the most touristic appeal on the island, and is often referred to as the mecca of tourism in St. Lucia. The oldest town, and once the capital of St. Lucia it is located on the western side of the island. Renowned for its natural beauty which includes dramatic vistas such as the iconic Pitons, two volcanic spires which rise from the Caribbean Sea, the only World Heritage Site on the island, which includes the Sulphur Springs, the world's only drive-in volcano, Soufriere is a major attraction for cruise and stayover visitors alike. For this reason, the town is home to a number of top-rated hotels such as the Jade Mountain, Ladera, and Sugar Beach: A Viceory Resort. Other major hotels include: Anse Chastanet, Hotel Chocolat, and Fond Doux Plantation & Resort. Also adding to the town's touristic appeal are a number of organized tours and hikes to natural attractions such as the Gros Piton, numerous waterfalls, botanical gardens and Colonial Estates. A recent addition to the tourism product is a beach park located at the Hummingbird Beach where a number of concessionaire booths are now operational.

The specific site to be upgraded under the ORTCP is the Old Trafford Complex, located in the heart of the town of Soufriere. With the recent thrust to bolster community tourism and to facilitate the trickling down of the benefits of tourism to the masses, the Soufriere Constituency Council, under the leadership of the Mayor, has begun implementation of the upgrade of the Old Trafford Complex. As part of this upgrade a first phase was completed, where a bus terminal, provision market and food court were constructed. Now the intention is to continue the upgrade with the construction of a building to house concessionaire's booths, mainly for touristic and commercial activities.



PM-Provision Market BS-Bridge Street BT&S- Bus Terminal and Snackettes PPS- Proposed Project Site

Photo 1: Section of Soufriere Town showing the Old Trafford Complex and the site for the project.

3.1 Characteristics of the Site

The Old Trafford Complex grounds is an enclosed area, which is bounded by Bridge Street to the East, the Soufriere Bay to the West, the Soufriere River to the North and the vacant Office of the Soufriere Constituency Office to the South. The Old Trafford Complex is located along the main throughfare (Bridge Street) in Soufriere Town. The complex is home to the Soufriere Bus Terminal, which is the drop off and pick-up point for three (3) bus routes serving Soufriere and neighbouring districts as well as to the capital city, Castries. This is the only bus terminal facility of its kind in Saint Lucia, with a sheltered seating area. A provision market which was not particularly busy at the time of the visit, as expected since it was Tuesday afternoon, and also because of the current Covid-19 protocols which are in effect, is located in the complex, as well as a food court. All of these amenities are within the complex and separated from the proposed site for the construction by the old Trafford access road and a spacious courtyard.



Photo 2: Mini-buses parked and awaiting passengers in the Bus Terminal at the Old Trafford Complex



Photo 3: The units housing the snackettes and the passenger waiting area at the Complex

The specific lot for the construction of the building to house the concessionaire's booths, is an empty lot directly west of the bus terminal within the footprint of the Old Trafford Complex, hence there is no need for demolition of any existing structure. The vacant lot to be utilized for the construction of the building allows for a fair distance between the site and the river, thereby reducing the risk of contamination to the river. Additionally, the site is sufficiently distanced from the hospital, fire station and the commercial buildings in the area because of the location of the bridge and the river, therefore, construction activities should not create any major negative impacts on their operations.



Photo 4a: A part of the vacant lot which is the site for the construction of the Building to house the Concessionaires' Booths



Photo 4b: Another section of the vacant lot which is the site for the construction of the Building to house the Concessionaires' Booths

Located almost directly east and across the Soufriere Bridge is a public restroom, further east of the area are the Soufriere Hospital, and the Soufriere Fire Station. A number of commercial and food service businesses are located within walking distance of the site, but because of the relatively enclosed nature of the project site, construction activities should not create any major inconvenience to the operations of the business houses. Residencies are scattered throughout the town centre but not in very close proximity to the site. Directly across the river is the Whispers' Night Club a popular socializing spot for residents of Soufriere and visitors from neighbouring districts.

Due to the nature of the services provided in the complex, particularly public transportation, food service outlets, and fresh market, the area is highly trafficked by both motor vehicles, mainly the minibuses, and pedestrians. During the two site visits the complex was not heavily trafficked, however, the Mayor pointed out that the area is spacious enough and the site can easily accommodate close to a hundred (100) vendors and forty (40) buses at the busiest period, a common occurrence on busy business days pre-Covid.



Photo 5a: The Provisions Market at the Old Trafford Complex on a slow business day



Photo 5b: Photo of the Provisions Market on a busy day of business

The site is located directly south of the Soufriere Bridge, which links Soufriere to its neighbouring village, Canaries and the capital city, Castries. The Soufriere River runs along the northern boundary of the site and drains into the Soufriere Bay which is further away from the site. The Soufriere Bay is part of the Soufriere Marine Management Area (SMMA), a 12-kilometre-long protected marine area. The SMMA oversees the use of the marine resource within the area to ensure that all users benefit equitably from the resource and in that way helps to reduce conflicts among the various users. Further north is the Soufriere Public Cemetery and beyond the Cemetery the Hummingbird Beach Park. The Soufriere Constituency Council Administrative Building, which is currently vacant, is along the southern boundary.



Photo 6: A view of the Soufriere Bay from the southern end of the Complex

4.0 THE LEGAL AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL MANAGEMENT

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

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

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

Table 1. Agencies with Environmental Management Responsibilities

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

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

	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.	
Soufriere Marine Management Area (SMMA)	The Soufriere Marine Management Association Inc. is a self-sustained not-for-profit NGO authorized by the Government of St. Lucia to manage both SMMA and the Canaries and Anse La Raye Marine Management Area (CAMMA). The Association is mandated to conserve the natural marine environment and ensure sustainable use and development of the Areas particularly within the fishing and tourism sectors.	Launched in June 1995

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

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

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

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

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

5.0 SITE SPECIFIC ENVIRONMENTAL AND SOCIAL IMPACTS

The Construction of the concessionaire’s booths at the Old Trafford Complex 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 concessionaires booth. 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 Soufriere Provision Market, with over 40 stalls on a Saturday but reduces to as low as 10 during the week, and the bus terminal which serves the Castries, Vieux Fort and Fond St. Jacques bus routes. For this reason, mitigation measures such as the development and implementation of a traffic management plan, and a site management plan, including provisions for pedestrian movement, and use of hoarding and signage is paramount to ensure the safety and security of the vendors, the bus drivers, their clients and their property and the general public. Measures to mitigate noise and dust pollution will also be important to ensure that the major stakeholders, the vendors, the bus drivers and the contractor can operate with minimal disruptions to each other's activities.

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

The Soufriere River and Bay are located in close proximity to the project site, and there is the potential for runoff and construction waste entering these resources. To reduce this occurrence the contractor will have to adhere to guidelines in Table 5 below. To ensure that the river and Bay are not negatively impacted by waste water and oil and fatty residue from the booths during operations, grease traps would have to be installed.

Consultation spearheaded by the SCC and supported by the ORTCP Safeguards Officer and Communication Officer, will be held. Among the groups to be consulted are the Vendors and Minibus Drivers' Associations, offices, business owners and residents in the project area. Due to the existing Covid-19 situation where gatherings are limited to ten persons, consultations in small-group sessions of no more than ten persons will be held utilizing social distancing protocols. If in-person meetings are not permitted, meetings can be conducted through platforms such as Zoom and Skype. The contact information for the Social Safeguards Officer will be provided to the major stakeholders to allow them an easily accessible channel for expressing concerns about the project. There are at least two (2) radio stations in Soufriere which have a very large listenership which can be utilized to disseminate information about the project to the wider community and more specifically persons in vulnerable groups such as the elderly and persons with disabilities informed of the progress of construction activities as well as to promote the Grievance Redress Mechanism (GRM).

Table 2: Showing the classification of Activities on Site and the Number of persons involved.

Category	Type of Activity
Vendors	Selling provisions, fruits and vegetables. The number was low on the Tuesday afternoon, numbering less than ten (10), but on Saturday the number had increased to over forty (40).
Bus operators and commuters	Providing transportation services from Soufriere Town to Fond St. Jacques, Vieux Fort and Castries. The number of buses on the site during the visit were reduced due to a system of rotation in place as a result of the Covid-19 pandemic. But during normal

Category	Type of Activity
	operations at least fifteen (15) buses can be parked at the terminal awaiting passengers. The number of commuters in the terminal vary from as high as 30 during the rush hours between 6:00 am to 8:00 am and 4:00 pm to 5:30 pm to as low as 10 during the slower periods in the day. The busiest periods are the times when construction activities would not have begun or just about to end, while the slow periods will coincide with the construction works.
Food Service Providers	Three units are operational. Providing food service to the vendors, their customers, the bus drivers, and passengers, as well as passersby. A total of nine (9) persons are employed, some on a part time basis due to the slowdown in economic activity resulting from the Covid-19 pandemic. An access road separates these outlets from the site and with the erection of hoarding the units should not be affected by the construction activities, allowing operations to continue as normal. Additionally, the snackette is designed in a way that allows patrons to be served without entering the compound.

Table 3: Pre-screening for categories of project affected persons

Sub-Project: Old Trafford Redevelopment Project - Construction of Concessionaire’s Booth		
Potential Social Impact	Likelihood	Observations
Permanent Land acquisition	No	The land is owned by the Crown
Temporary land acquisition	No	
Temporary Loss of livelihoods	No	The livelihood activities that are currently happening on the site can continue unhampered during construction. This is because the different units, that is the snackette, bus terminal and provision market are separated from the lot for the proposed construction by an access road and courtyard which provides sufficient space for their continued operations. Periodic site visits by the Safeguards Officer as well as daily monitoring by the Site Clerk will assess the level of dust and noise and ensure that the contractor utilizes the

		necessary mitigation measures to allow the continuation of operations of the various groups on site.
Permanent loss of livelihoods	No	All economic activities will continue undeterred throughout construction and therefore, the current group of operators on the site will remain post construction.
Loss of assets	No	
Resettlement (What needs to be moved?)	Nothing has to move or be relocated, neither will there be any economic displacement	All economic activities will continue undeterred throughout construction and therefore, the current group of operators on the site will remain post construction.
Asset Compensation (What is to be compensated?)	Not Applicable	There will be no temporary or permanent loss of livelihood of any kind neither any resettlement and therefore no need for compensation.

6.0 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:

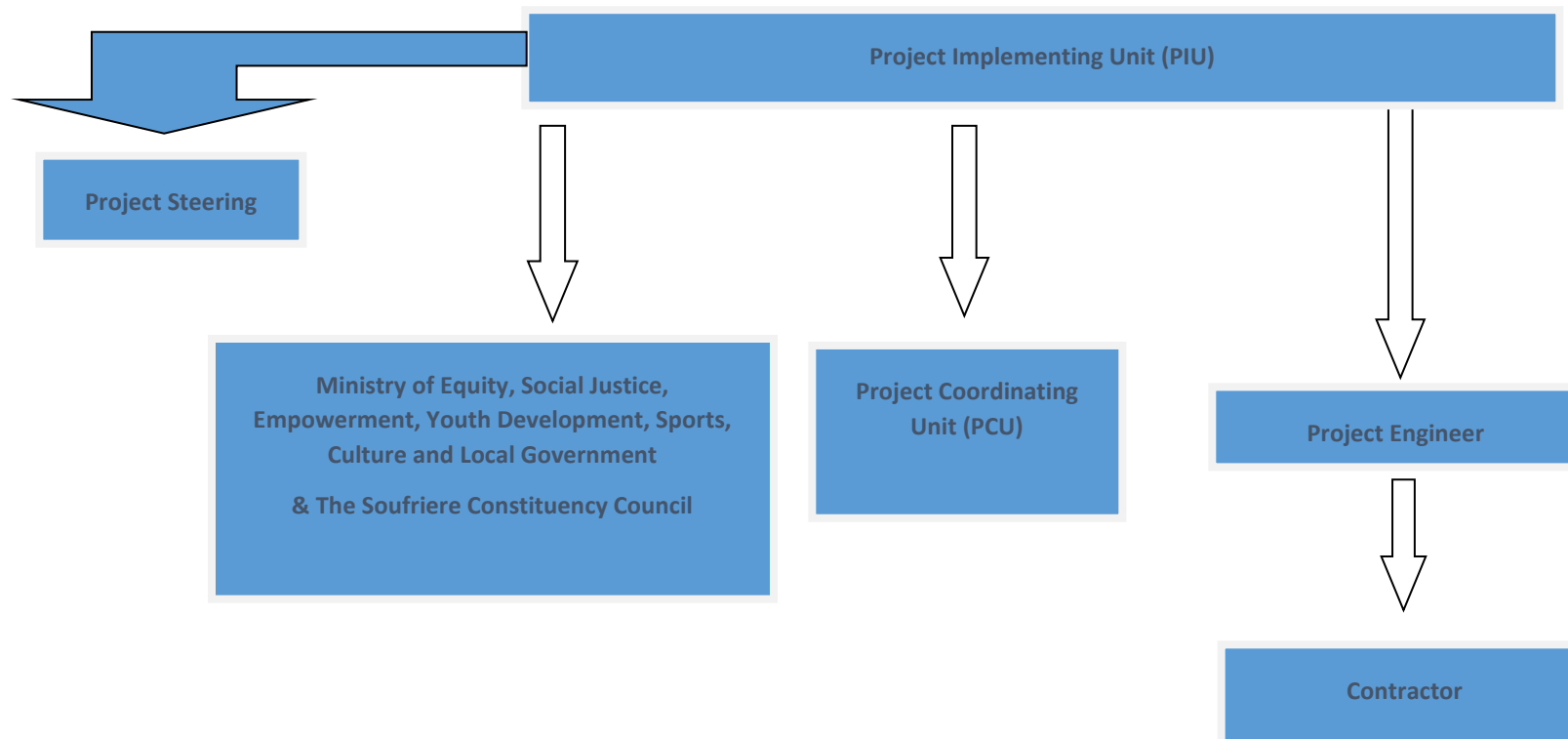
- Environmental and social management should be fully integrated within the overall project management framework, directed towards achieving an environmentally sustainable project which meets its intended purpose, functions efficiently throughout its life, and results in minimal adverse environmental 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.

7.0 ORGANISATIONAL ASPECTS

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

Figure 1. INSTITUTIONAL ARRANGEMENT FOR E & S MANAGEMENT



7.1 Roles and Responsibilities

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

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

Project Coordinating Unit (PCU)

- Coordination of the Fiduciary Aspects of Project Implementation.

Project Steering Committee (PSC)

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

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

- To provide support with the GRM

The Contractor

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

7.2 The ORTCP and Line Agencies

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

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

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

8.0 PROJECT PHASES AND ENVIRONMENTAL AND SOCIAL MANAGEMENT

8.1 Pre-Construction Phase

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

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

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

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

8.2 Construction Phase Environmental and Social Management Activities and Responsibilities

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

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

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

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

- Contractual clauses intended to control adverse impacts, in line with meeting the environmental and social policies of the Government and the ORTCP.
- Requirements for environmental submissions as part of the bid including identifying an E&S officer.
- Construction supervision will include monitoring of, and reporting on, environmental and social aspects, on a daily basis.
- Environmentally-friendly construction involves little more than the adoption of good construction practices.
- A summary of key environmental and social adverse impacts and the contractual obligations which will be imposed on contractors in order to minimise occurrence and severity of construction impacts.
- Emphasis on the need for pricing of bids to take into account, compliance with environmental and social requirements set out in the bid documents, so as to facilitate compliance.

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

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

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

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

8.3 Operations Phase Environmental and Social Management Activities and Responsibilities

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

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

9.0 ENVIRONMENTAL AND SOCIAL MONITORING AND REPORTING

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

There are two basic forms of environmental and social monitoring:

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

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

9.1 Day-to-Day Monitoring and Reporting

Day-to-day environmental monitoring will be undertaken by a suitably qualified employee, such as a Site Clerk employed by MOT and the contractor may identify an employee specifically assigned as Environmental Compliance Monitoring Officer to undertake systematic observation of all site activities. These employees may have other responsibilities, as long as they are able to properly meet the environmental and social monitoring requirements.

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

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

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

Bi- Weekly reports prepared by the Project Manager will summarize the results of the daily site monitoring, remedial actions which have been initiated, and whether or not the resultant action is having the desired result. The reports will also identify any unforeseen environmental problems and will recommend suitable additional actions. Additionally, the Safeguards Officer will hold informal discussions with the users of the complex to ascertain any negative impacts that the works may be having on their operations.

9.2 Monitoring by ORTCP and Line Agencies

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

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

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

9.3 Progress Meetings and Monthly Reports

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

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

10.0 COSTS ASSOCIATED WITH ENVIRONMENTAL AND SOCIAL 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 4 ESMP Implementation Costs incurred by Contractors

ESMP Activity incurring cost	Estimated cost (US\$)
Signage for vehicular and pedestrian traffic management (4 signs @ EC\$ 1,200)	1, 800.00
Traffic safety provisions (barriers, cones, lighting, etc.)	2, 000.00
Public announcements and communications with stakeholders	2,000.00
Total	5, 800.00

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

11.0 PROJECT MITIGATION PLANS

The following are detailed in tables 5 and 6 for the potential impacts identified during construction:

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

11.1 Design Phase Mitigation

The Mitigation measures for the design phase impacts are provided in Table 5 below

Table 5 - Design Phase Environmental and Social Management

Project Action or Activity	Environmental/ Social Impacts	Mitigation Measures Recommended
1.New designs could affect the aesthetics of the area	<ul style="list-style-type: none"> • Introduction of a building may obstruct the view from existing buildings and streets. 	<ol style="list-style-type: none"> 1.Engage relevant stakeholders in early consultation, for guidance and promote the use of the GRM. 2. Present draft designs to relevant stakeholders for their review and feedback before finalisation. 3. Facilitate easy access to up-to-date design information, and feedback mechanisms.
2. Plans for landscaping, greening of the site	<ul style="list-style-type: none"> • Competition for scarce water resources for landscape irrigation. 	<ol style="list-style-type: none"> 1. The landscaping should be designed to minimise irrigation requirements, and should only be irrigated where and when necessary. 2. Drought-resistant native or other well adapted non-invasive plants should be used where possible in the landscaping design. 3. If possible, the design should maximise capture of rain water and storm runoff, with the intention to meet irrigation water requirements from these sources under normal conditions.

11.2 Potential Environmental Impacts during Construction and Recommended Mitigation and Benefit Enhancement Measures

The potential direct and indirect, on-site and off-site environmental impacts associated with the project are presented in table 6 below, and includes:

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

Table 6. Anticipated Construction Impacts and Recommended Impact Mitigation/Benefit Enhancement Measures

Actions Affecting Resources	Potential Impact	Mitigation/Benefit Enhancement Measures
1 Workforce Deployment.	1.1 Creation of construction employment opportunities for local residents.	<ul style="list-style-type: none"> - Contractors should make maximum use of local labour. - Contractors should maximise use of labour-intensive construction methods rather than machinery-intensive. - Contractors should maximise participation of local suppliers of materials, services and equipment, and sub-contractors.
	1.2 Development of social friction between the contractor's workforce and the public.	<ul style="list-style-type: none"> - 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. - Contractor should establish a Grievance Redress Mechanism (GRM) for the communities and workers which sets out the relevant dates, details of the complainant, the nature of the complaint, action taken, and other relevant details. - Contractor should take appropriate measures to ensure that the site is well-secured in order to protect assets on site. - Contractor should develop and maintain a code of conduct for all personnel, including sub-contractors for site activities.
	1.3 Health and safety hazards to the workforce arising from	<ul style="list-style-type: none"> - 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 avoidance of dangers. The standards and guidelines

	<p>participating in an inherently dangerous occupation.</p>	<p>regarding health and safety shall be the draft Labour Code, The Factories Regulations (Cap 106 of 1948), and Employees (Occupational Health and Safety) Act (No. 10 of 1985).</p> <ul style="list-style-type: none"> - The Occupational Health and Safety Plan should be developed as part of this and implemented by the contractor. - 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. - Contractor should provide adequate on-site first aid facilities with qualified first-aiders, together with approved evacuation plans/procedures for seriously injured persons. - Contractor should provide personal protective equipment such as protective helmets, safety boots, protective clothing, ear mufflers, dust masks, gloves etc, appropriate to the activities being undertaken by the workforce, and make it a condition of employment that these are worn when appropriate. - Contractor should convene regular health and safety meetings with workforce to emphasize safe work practices and expectations. - The contractor will provide lights, guards, fencing etc for protection of the works and for the safety and convenience of the public or others. - Contractor should install a fire hydrant at the entrance to the site. - Contractor should carry the requisite insurances. - Accidents will be promptly reported to the Labour Department and requisite procedures followed. Near misses will be recorded by the Health and Safety Officer. - Contractor should ensure adherence to the National and International Guideline for preventing Covid-19.
	<p>1.4 Environmental damage caused by the workforce.</p>	<ul style="list-style-type: none"> - 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: - Train workers about environmental issues and measures to be taken in the event that actions to protect the environment are necessitated.

		<ul style="list-style-type: none"> - Designate an officer to supervise and ensure environmental obligations are complied with. - Incorporate environmental and other issues into the agenda of regular meetings with workers. - Order immediate suspension or a halt to any activity which is causing, or is likely to cause significant environmental damage, and to commit to make good any such damage at his own expense, in accordance with the instructions of the relevant authorities. - Require the immediate and permanent dismissal from site of any member of the workforce who is committing or has committed acts prejudicial to the environment including theft or interference with property and offensive behavior. - Provide and enforce worker use of appropriate, accessible toilet facilities and of appropriate, accessible solid waste disposal facilities.
2. Site clearance and earthworks.	2.2 Increased erosion and sediment levels in the Soufriere River as a result of construction activities.	<ul style="list-style-type: none"> - Contractor should take all steps to minimise erosion and siltation, and protect water resources, including construction of silt traps at strategic locations. - Cleared areas should be vegetated as quickly as possible, using appropriate local species. - Contractor should submit a construction drainage plan for approval by relevant authorities, in particular, proposals for trapping eroded sediment. - Ponding of water that may encourage mosquito breeding will be minimised. - Final drainage design will minimise erosion and sedimentation by featuring the following: <ul style="list-style-type: none"> - Vegetated swales will be used to slow and infiltrate water and trap pollutants in soil where they can be naturally destroyed. - No discharges from pipes will run directly to the river. - Directly connected impervious areas will be eliminated or minimised. - Use of pervious pavements should be maximised. Pervious paving would decrease stormwater runoff and reduce nonpoint source pollution. - High permeability concrete will be used for pathways.

		<ul style="list-style-type: none"> - Runoff from gutters and roof drains should be directed to storage for irrigation. Excess will be directed to permeable areas, to infiltrate near point of generation. - Use of natural systems to treat storm water runoff will be maximized. - Contractor should maintain setbacks from the river bank to minimise impacts on marine environment.
	<p>2.3 Smoke and odour nuisance arising from on-site burning of construction waste.</p> <p>2.4 Fire damage to surrounding properties.</p>	<ul style="list-style-type: none"> - There will be no burning of waste on site. All waste will be disposed at an approved location.
	<p>2.6 Damage to any chance finds and protected sites.</p> <p>2.7 Damage to cultural heritage.</p>	<ul style="list-style-type: none"> - 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. See Appendix IV for detailed Chance Find Procedure.
3 General construction operations.	3.1 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.	<ul style="list-style-type: none"> - All necessary precautions will be taken by the contractor to prevent land and water pollution. - 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. - Contractor should minimise and carefully control use of chemicals. - Contractor should advise of type and quantity of chemicals to be stored on site for construction purposes. Temporary storage location of permissible quantities will be approved by the relevant authorities, and appropriate precautions taken. These include: <ul style="list-style-type: none"> - Construction of a dedicated chemical storage structure to be roofed with a lockable door. - The floor to be equipped with a continuous curb to retain spilled materials. - Chemicals not to be stored near burning material or hot work (welding, grinding) or in shop areas.

		<ul style="list-style-type: none"> - Adequate space and shelving to be provided to properly segregate chemicals. - Dry materials to always be placed above liquids, never vice versa. - Liquids not to be stored above eye level. - Storage for PPE to be provided where it is easily accessible in the event of emergency, but not in the chemical storage area. - Appropriate emergency wash area to be provided. - Information of chemical locations, contents, appropriate emergency response and other details to be readily accessible to site management, in the event of spill or injury. - Procedures in the handling of chemicals or other hazardous material and in event of emergency to be clearly posted on the container. - Contractor should install secondary containment for fuel stored on site. - Contractor should adopt pollution prevention measures relating to fuel and oil storage/dispensing arrangements, to prohibit other than emergency maintenance of equipment and vehicles on the site, and require usage of spillage trays during on-site refueling of minor equipment. - Waste oils arising from emergency servicing of construction equipment will be disposed of at a licensed recycling facility. - There should be no washing of vehicles on site, washing of plant and tools to be carried out at designated areas within the work site which are provided with oil/grease traps.
	<p>3.2 Land and water pollution, public health hazards and reduction in amenity value, arising from inappropriate/inadequate sewage disposal practices.</p>	<ul style="list-style-type: none"> - Contractor should abide by Public Health Act of 1975 and Regulations, in the provision of sanitary facilities for workers on site. - Sewage will not be permitted to enter the drainage or coastal waters. - Contractor should prohibit the use of worksite pit latrines. - Requirements for provision of adequate non-polluting worksite sanitary facilities include provision of sufficient number of adequate toilet facilities

		<p>on the site connected to suitable treatment, or otherwise collected and disposed of. The contractor could also make arrangements for the use of the comfort station in close proximity to the site.</p> <ul style="list-style-type: none"> - All workers to be required to use these facilities. Workers who refuse are to be subject to dismissal.
	<p>3.3 Land and water pollution, public health hazards, landscape degradation and reduction in amenity value, arising from inappropriate/inadequate solid waste disposal practices.</p>	<ul style="list-style-type: none"> - Developer will abide by the provisions of the Waste Management Act of 2004, the Litter Act of 1983 and its amendments (1985 and 1993), and the Public Health Act of 1975 and Regulations. - Solid waste will not be permitted to enter drainage or coastal waters. - Requirements for provision of adequate non-polluting worksite sanitary facilities include provision of 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. - If contractor is hauling site-generated waste, legal requirements for proper containment of the waste will be observed, and disposal will be at an approved location. - Soil/spoil will be kept separate from other construction waste and reused on site with appropriate sediment control. - Spoil generation will be minimised as developer will balance cut and fill within the site.
	<p>3.4 Hazards associated with roadside storage of construction materials and parking of plant and vehicles.</p>	<ul style="list-style-type: none"> - No parking or stockpiling of materials will be allowed along the public roadway. - No materials shall be stored so that they encroach on, or in any way adversely affect operation of, sections of roadway which are in use by the public or result in siltation or blockage of drains. - 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. - Parking areas for employees' private vehicles will be located within the worksite only, in approved areas.

	3.5 Impedance of access to/from lands adjacent to the worksite.	<ul style="list-style-type: none"> - 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 roads, footpaths, properties and public beaches, or coastal waters. - Neighbouring users will be informed in advance of any activity that has the potential to impede access to their properties or other public spaces. - If needed, alternative access routes will be created.
	3.6 Interference with traffic due to disposal of construction wastes, and other wastes.	<ul style="list-style-type: none"> - Contractor should abide by all solid waste regulations in the disposal of demolition waste. - Public roads will be kept free and clear of wastes. - Contractor should erect appropriate signage in the vicinity of the site to warn other road users of construction traffic. - Contractor should consult Transport Board early for approval and advice if there is likely to be any traffic disruption.
	3.7 Increased road safety hazards and inconvenience to road users and the general public caused by the construction traffic/works interfering with normal traffic flow.	<ul style="list-style-type: none"> - Contractor should at all times shall take care to protect the public and facilitate the uninterrupted flow of traffic during his operation and use of public roads. - Contractor should erect appropriate (approved) signage on either side of the junction with the highway to alert other road users to possibility of slow construction traffic/heavy equipment crossing lanes etc. - Construction vehicles will be licensed in accordance with Ministry of Transport stipulations.
	3.8 Damage to existing road pavements and structures caused by overloaded haulage traffic.	<ul style="list-style-type: none"> - Contractor should adopt every reasonable means to prevent damage to roads or bridges communicating with, or en routes to the site, by his or his subcontractors' traffic. - Contractor should be responsible for the cost of reinstatement of pavement or structures which have been damaged by his or his subcontractors' haulage traffic. - 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.

		<ul style="list-style-type: none"> - Tracked equipment will be transported to site on appropriate transporters, and will not be permitted to track directly on the road pavement.
	3.9 Generation of road safety hazards on haul routes.	<ul style="list-style-type: none"> - Contractor should consider location in his selection of suppliers, to minimise haul distances to site. - Contractor should ensure that all tailgates and dropsides are properly secured, there is no overloading of loose materials above truck sides, and all loads are properly secured. - Contractor should comply with speed restrictions imposed by the relevant authorities. - 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. - 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.
	3.10 Competition for scarce potable water resources with existing users.	<ul style="list-style-type: none"> - Contractor should conserve water. - Contractor should have water storage for construction purposes.
	3.11 Competition for scarce water resources for landscape irrigation.	<ul style="list-style-type: none"> - The landscaping should be designed to minimise irrigation requirements, and should only be irrigated where and when necessary. - Drought-resistant native or other well adapted non-invasive plants should be used where possible in the landscaping design. - The design should maximise capture roof water and storm runoff, with the intention to meet irrigation water requirements from these sources under normal conditions.
	3.12 Damage to and interference with public and privately owned services.	<ul style="list-style-type: none"> - Contractor should identify and locate existing services on the site boundaries, will take all reasonable precautions to protect services during construction and will repair and reinstate forthwith any damage arising from the works, at his expense, in consultation with/under the supervision of, the relevant authorities.

	<p>3.13 Creation of dust nuisance from construction activities on- and off- site.</p>	<ul style="list-style-type: none"> - 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. - 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. - All material to be stockpiled within the worksite will be kept clean and free of mud, soil and other materials. - Access roads will be regularly swept. - All construction waste taken off site and aggregate brought onto the site will be covered by a tarpaulin to minimize dust emissions. - Contractor should not stockpile material along the public roadway.
	<p>3.14 Creation of noise nuisance and air pollution caused by haulage vehicles/ and machinery operation.</p>	<ul style="list-style-type: none"> - Contractor should take all 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. - Operations will be carefully designed, including selection of haulage routes within the site and location of stockpiles. - 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. - Noise specifications for construction equipment will be stipulated in accordance with Labour Department standards for the occupational environment. - Internal combustion engines will be fitted with silencers. - Records of complaints will be kept.
	<p>3.15 Increase in emissions of ozone-depleting substances (ODS)</p>	<ul style="list-style-type: none"> - Contractor should select alternative materials and/or technologies to minimise the use of ODS.

	3.16 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.	<ul style="list-style-type: none"> - 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. - 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.
4. Building construction on land.	4.1 Dramatic alteration of views/ diminished aesthetics of the site from the sea, the air, and the roadway.	<ul style="list-style-type: none"> - A Site Management Plan should be developed and implemented by the Contractor. - Hoarding will be erected to conceal construction activity from persons in close proximity to the site. - All electrical and telecommunications cables will be underground.
5. Concrete works	5.1 Dust and other air pollution arising from the operation of concrete plant.	<ul style="list-style-type: none"> - The amount of concrete to be mixed on site will be minimised. Concrete requirements will be met by use of pre-mixed concrete. - Concrete mixed on site will be done within specially constructed mixing bays designed to contain fugitive emissions. - All moveable plant will be fitted with effective dust suppression equipment and operated and maintained in accordance with the manufacturer's manuals.
	5.2 Pollution of waterbodies and fish kills, resulting from entry of cement dust, fresh concrete and mixer wash water.	<ul style="list-style-type: none"> - The amount of concrete to be mixed on site will be minimised. Concrete requirements will be met by pre-mixed concrete. - A concrete mixing bay will be constructed to minimize concrete losses. - Particular care will be taken when construction activities are carried out in or in the vicinity of drainage systems and over water bodies to ensure that pollution does not occur. - Concrete will not be poured in exposed areas during rains. - Although quantities of concrete mixed on site are anticipated to be small as premix will be preferentially used, special precautions will be taken to ensure that materials such as cement dust, fresh concrete and lime do not pollute water bodies.

		<ul style="list-style-type: none">- Washing of readymix equipment or dumping of excess concrete on site will be prohibited.
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11.3 Natural Disaster Mitigation and Environmental and Social Management

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

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

Table 6 – Natural Disaster Environmental and Social Management Plan

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

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

	<p>4. Buildings can topple in an earthquake. This includes buildings that are not yet complete, and some construction projects will be at higher risk because their earthquake protection measures may not be completed.</p>	<p>covering your head and neck with one arm and crawling to the closest shelter, then holding on to something steady until the shaking stops. Finding shelter is the challenge during an earthquake on a construction site, but even a large piece of equipment or a tree can serve as a shelter when needed. It is recommended to practice this technique at the start of construction.</p> <p>4. Hold earthquake drills to ensure that construction crew members know the proper response during an earthquake- This is a key preparation step because, in the chaos of the moment during an earthquake, people may experience moments of panic. Preparing ahead of time, can help prevent injury during an earthquake.</p> <p>5. Watch for fires- Broken gas lines, even near construction sites, and damaged electrical components or electrical lines can cause fires. Also, the motion of the earthquake itself can release sparks, leading to a fire.</p> <p>6. Keep an earthquake emergency supply kit on hand to protect those on the site.</p> <p>6. If operating equipment when an earthquake hits, stop and exit the vehicle as soon as safely possible- It is difficult to control equipment and vehicles during an earthquake, and they can be deadly.</p> <p>7. Know that after the shaking stops, there is always a possibility of aftershocks. For that reason, do not return to the site or work until you are confident all risk has passed.</p> <p>8. If there is a clear path away from the construction site, exit as quickly as possible after the shaking has stopped. A construction site is not somewhere to be during aftershocks, so encourage the entire work crew to get away quickly for their safety.</p> <p>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.</p>	
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		<p>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.</p> <p>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.</p> <p>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.</p>	
3. Floods	<ol style="list-style-type: none"> 1. Pollution- Floods will wash chemicals and sewage into the water. The contaminated water will spread quickly over an area causing public health issues and killing fish. 2. Loss of life- Floods can cause death and injury. Workers can get trapped in buildings by the quick rising waters. 3. Property- As flood waters rise, they can flow into low-lying properties. The water will deposit huge amounts of debris and silt that will destroy floors, walls and any electrical gear. 		

		<p>7. Understand the risk of contamination from chemicals. Flood water can be contaminated with chemicals that are stored on a construction site, and this puts the surrounding community at risk.</p> <p>8. If a flash flood warning is issued, evacuate the area. Flash floods can kill in an instant, so take these warnings seriously. Even construction equipment is not safe from flash floods.</p> <p>9. Flood water is not safe, hence, never wade in flood water on a construction site, because of the high risk of contamination, and the accumulation of debris which can cause injury. Wait until the water recedes or have it drained properly before entering the construction site to assess the damage.</p>	<p>The Contractor- assistance can be sought from NEMO as well as the DOI.</p>
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11.4 COVID-19 Guidelines for Construction and Operation

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 will follow the Guidelines in Appendix III, *Covid-19 National and International Health and Safety Guidelines* to develop the COVID Management Plan and should seek the assistance of the PIU, either directly or through the Supervising Engineer, as well as from the local health authorities when required.

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.

12. 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 VI*) (ii) designating staff with responsibility for addressing grievances at various levels of Government, and (iii) a time frame to address the filed grievances. The functioning of the grievance redress mechanism will be monitored and evaluated by the Social Safeguards Officer of the PCU during its implementation.

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

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

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

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

Processing Grievances

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

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

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

The steps undertaken should a grievance arise are as follows:

Grievance Redress Procedures

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

By letter, addressed to the: Project Manager ORTCP
 Ministry of Tourism, Information & Broadcasting,
 Culture & Creative Industries
 Sir Stanislaus Building
 The Waterfront
 CASTRIES

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

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

The Grievance should include the following information:

- (a) The name of the individual or individuals making the Complaint (the “Claimant”);
- (b) A means for contacting the Claimant (email, phone, address, other);
- (c) If the submission is on behalf of those alleging a potential or actual harm, the identity of those on whose behalf the Grievance is made, and written confirmation by those represented of the Claimant’s authority to lodge the Grievance on their behalf;
- (d) The description of the potential or actual harm;
- (e) Claimant’s statement of the risk of harm or actual harm (description of the risk/harm and those affected, names of the individual(s) or institutions responsible for the risk/harm, the location(s) and date(s) of harmful activity);
- (f) Whether the Claimant wishes that their identity is kept confidential.

The World Bank Grievance Redress Service

The Grievance Redress Service (GRS) is an avenue for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has or is likely to have adverse effects on them, their community, or their environment. The World Bank GRS can be found at the following URL link: <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

Complaints must be completed in writing and addressed to the GRS. They can be submitted using the following methods:

1. Online, by completing the online form:
<https://pubdocs.worldbank.org/en/743201426857500569/Grievance-Redress-Service-GRS-complaint-form.docx>
2. By email to grievances@worldbank.org
3. By letter or by hand delivery to the World Bank Headquarters in Washington D.C., United States or any World Bank Country Office- printing and using this form:
<https://pubdocs.worldbank.org/en/743201426857500569/Grievance-Redress-Service-GRS-complaint-form.docx>

Addressing Gender-Based Violence

The GRM will specify an individual who will be responsible for dealing with any gender-based violence (GBV) issues, should they arise. A list of GBV service providers will be kept available by the project. The

GRM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor.

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

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

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

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

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

Promoting GRM Awareness

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

Appendix I – GRM Form



OECS REGIONAL TOURISM COMPETITIVENESS PROJECT

REGISTRATION OF GRIEVANCE

Please use CAPITAL LETTERS

Name of Project Site: _____

The complainant prefers to not have his / her name registered

From:

Name: _____

Gender: Female Male

Contact No: _____

Address: _____

Preferred method of contact: Telephone call WhatsApp / Messenger Letter

Email (Please provide address) _____

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

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

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

(a) _____

(b) _____

(c) _____

(d) _____

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

Date: _____ Time of Reporting: _____

dd/mm/yy

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

WhatsApp / Messenger

(Signature of aggrieved person) _____

Name of recording Officer: _____ (Signature) _____

(Please print)

List all documentation enclosed: (continue overleaf)

Appendix II – Guidelines for the Submission of Waste Management Plans



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.*

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

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

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

This includes but is not limited to:

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

15. Approval will be granted by the Labour Department upon submission and review of the relevant documentation, plans and previous inspections where applicable.
16. Submit occupational safety and health plan/policy to the Department of Labour.
17. Pay particular attention to the provisions of the following Sections of the Act:
 - 256 - Duties of employers at construction sites
 - 257 - General Duties of employers
 - 260 - General Duties of employees
 - 261 - Duties of owners at construction sites
18. Adherence to all directives and guidelines from Chief Medical Officer.
19. The Department of Labour reserves the right to halt all activities at any site where there is a failure on the part of any party to comply with the stipulated guidelines.

COVID-19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS

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

- (a) **ASSESSING WORKFORCE CHARACTERISTICS:** Many construction sites will have a mix of workers e.g. workers from the local communities; workers from different parts of the country; and even workers from other countries. Workers will be employed under different terms and conditions and be accommodated in different ways. Assessing these different aspects of the workforce will help in identifying appropriate mitigation measures:
 - The Contractor should prepare a detailed profile of the project work force, key work activities, schedule for carrying out such activities, different durations of contract and rotations (e.g. 4 weeks on, 4 weeks off).
- (b) **ENTRY/EXIT TO THE WORK SITE AND CHECKS ON COMMENCEMENT OF WORK** Entry/exit to the work site should be controlled and documented for both workers and other parties, including support staff and suppliers.
 - Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.
 - Training security staff on the (enhanced) system that has been put in place for securing the site and controlling entry and exit, the behaviours required of them in enforcing such system and any COVID - 19 specific considerations.
 - Training staff who will be monitoring entry to the site, providing them with the resources they need to document entry of workers, conducting temperature checks and recording details of any worker that is denied entry.
 - Confirming that workers are fit for work before they enter the site or start work. While procedures should already be in place for this, special attention should be paid to workers with underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.

- Checking and recording temperatures of workers and other people entering the site or requiring self-reporting prior to or on entering the site.
- Providing daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.
- During the daily briefings, reminding workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.
- Preventing a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or (if that is not possible) isolating such worker for 14 days.
- Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.

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

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

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

- Providing cleaning staff with adequate cleaning equipment, materials and disinfectant.
- Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.
- Where it is anticipated that cleaners will be required to clean areas that have been or are suspected to have been contaminated with COVID-19, providing them with appropriate PPE: gowns or aprons, gloves, eye protection (masks, goggles or face screens) and boots or closed work shoes. If appropriate PPE is not available, cleaners should be provided with best available alternatives.

- Training cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials).
- Any medical waste produced during the care of ill workers should be collected safely in designated containers or bags and treated and disposed of following relevant requirements (e.g., national, WHO).

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

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

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

- Training medical staff, which should include current WHO advice on COVID-19 and recommendations on the specifics of COVID-19. Where COVID-19 infection is suspected, medical providers on site should follow WHO interim guidance on infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected. • Training medical staff in testing, if testing is available.
- Assessing the current stock of equipment, supplies and medicines on site, and obtaining additional stock, where required and possible. This could include medical PPE, such as gowns, aprons, medical masks, gloves, and eye protection. Refer to WHO guidance as to what is advised (for further information see WHO interim guidance on rational use of personal protective equipment (PPE) for COVID-19).
- If PPE items are unavailable due to world-wide shortages, medical staff on the project should agree on alternatives and try to procure them. Alternatives that may commonly be found on

construction sites include dust masks, construction gloves and eye goggles. While these items are not recommended, they should be used as a last resort if no medical PPE is available.

- Establishing an agreed protocol for communications with local emergency/medical services.
- Agreeing with the local medical services/specific medical facilities the scope of services to be provided, the procedure for in-take of patients and (where relevant) any costs or payments that may be involved.
- A procedure should also be prepared so that project management knows what to do in the unfortunate event that a worker ill with COVID-19 dies. While normal project procedures will continue to apply, COVID-19 may raise other issues because of the infectious nature of the disease. The project should liaise with the relevant local authorities to coordinate what should be done, including any reporting or other requirements under national law.

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

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

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

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

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

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

- Communications should be clear, based on fact and designed to be easily understood by workers, for example by displaying posters on handwashing and social distancing, and what to do if a worker displays symptoms.

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

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

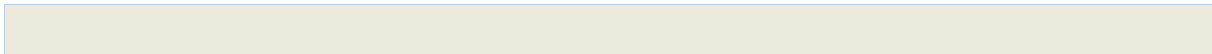
Appendix IV- Environmental and Social Best Practices Guidance



Environmental and Social Best Practices Guidance
For
Old Trafford Complex Upgrade

Acronyms and Abbreviations

CBD	Central Business District
CFP	Chance Find Procedures
EHD	Environmental Health Department
EMF	Environmental Management Framework
EMP	Environmental Management Plan
ESHS	Environmental Social Health and Safety
GRM	Grievance Redress Mechanism
H&S	Health and Safety
MOA	Ministry of Agriculture
MOI	Ministry of Infrastructure
NEMO	National Emergency Management Organisation
ORTCP	OECS Regional Tourism Competitiveness Project
OHS	Occupational Health and Safety
RPF	Resettlement Policy Framework
PCR	Physical Cultural Resources
PPE	Personal Protective Equipment
US\$	United States Dollars
WHS	Work, Health and Safety



Introduction

The following best practices are recommended for environmental impact mitigation for construction activities during the Old Trafford Complex Upgrade Occupational Health and Safety (OHS) considerations are contained in a stand-alone document.

All relevant regulatory requirements, design requirements and specifications should be complied with. The Contractor is required to prepare the following that should be guided by, among other things, the contents of this and the following documents:

1. Works programme
2. Method statement
3. ESHS Policy to guide ESHS performance during works implementation
4. Code of Conduct
5. Safety statement
6. Emergency response plan
7. Site management plan including the management of traffic and pedestrians in the project area.

All of these outputs should be approved before site works commence.

Planning and Execution of the Works

Staffing and compliance

1. Use appropriately trained personnel for planning, supervision and construction.
2. Clearly delineate project boundaries and sensitize equipment operators and other workers of the requirement to remain within these for all aspects of the works.
3. Comply with all design requirements and specifications, including ESHS requirements.
4. Select machinery appropriately for the intended job. Sometimes it is best to forego operational efficiency and substitute a different, less efficient machine for an improved outcome or to minimize impact on adjacent environment/uses/users e.g. use an excavator to shift and carefully place material rather than use a dozer which has less control over the material.
5. Make all construction personnel aware of the environmental values and the required mitigation measures.

Staging Area

1. Identify a staging area for stockpiling of aggregates and storing materials. Vacant areas in close proximity to the site can be considered, subject to the owner's agreement. A staging area will require appropriate security around the clock, and suitable mitigation measures to prevent pollution of the adjacent environment, or adverse impacts on the health and safety of nearby residents and road users. The contractor is expected to identify and negotiate for the use of such areas, but mitigations must be instituted as if this area(s) was an extension of the worksite, to the approval of the engineer.

General Requirements for Protection of the Environment

1. The Contractor is to 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 contractor methods of operation, including the following:
 - a. Employ relevant qualified and experienced personnel to ensure that the ESHS requirements of the project are adhered to during works implementation.
 - b. Ensure that all relevant consents and permits for proposed aspects of the work are in place before that work commences.
 - c. Ensure that works do not encroach beyond the designated project boundary unless there are mitigating circumstances that warrant this, and the works supervisor has clearly outlined the conditions under which such Works may proceed.
 - d. Incorporate environmental and other issues into the agenda of regular meetings with workers.
 - e. Order immediate suspension or a halt to any activity which is causing, or is likely to cause significant environmental damage, and commit to make good any such damage at his expense, in accordance with the instructions of the relevant authorities.
 - f. 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.
 - g. Provide and enforce worker use of appropriate, accessible toilet facilities and of appropriate, accessible solid waste disposal facilities.
2. The Contractor is to be held responsible at his own cost for taking immediate remedial action and payment of compensation for any environmental damage resulting from his actions.

General Safety and Convenience of the Public

Aside from measures to be instituted to ensure worker and public safety as outlined in the *Occupational Health and Safety (OHS) Guidance* and to safely minimize traffic interruptions through the work site, the Contractor is required to:

1. Carry out all works 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, and building entrances.
2. Adopt every reasonable means to prevent damage to buildings, roads or bridges beyond the project boundary. The Contractor will be held liable by the Ministry of Infrastructure for any repairs required to road or ancillary infrastructure beyond the project boundary that is damaged by activity related to this project construction. The Chief Engineer or an officer of the Ministry of Infrastructure (as appropriate) is to be notified to provide advice prior to any such repairs being undertaken. Any damage to buildings or other property adjacent to the works by the contractor or his agents will be remedied to the satisfaction of the building owner or other authorized person.

3. Carry out all haulage using vehicles of types and capacities appropriate to task and comply with gross vehicle weight restrictions imposed by the Ministry of Infrastructure and all laws and regulations pertaining to vehicle use on public roads.
4. Move heavy equipment to the work site with traffic assistants to ensure that the safety of motorists and other road users is not compromised.
5. Comply with speed restrictions.
6. Parking along the public roadway must not increase hazards associated with the works.
7. Clearly delineate the works and confine all works to within the project boundary.
8. No materials shall be stockpiled so that they encroach on, or in any way adversely affect operation of, sections of roadway which are in use by the public.
9. Keep records of complaints and actions taken in response.

Refer to the *Preliminary Occupational Health and Safety (OHS) Guidance* for further information.

Traffic Management

1. The work site should be clearly and safely delineated and all project activity confined to this area, to among other things, assure worker and pedestrian safety.
2. Erect clearly visible warning signs and barriers to warn the public of all potential hazards.
3. Develop the work schedule cognizant of local traffic patterns, e.g. avoid major works during rush hours.
4. Safe access through the works to business places and other premises by staff, customers and other users during working hours must be safely provided for. This may require scheduling some aspects of the works on evenings, weekends and holidays, when business places and institutions are closed.

Vendors and Minibus Operators

1. Erect signage to guide the public to ensure their safety and security.

Mitigation Measures during Earthworks

Earthworks Proposed

Base material will typically have to be removed in some areas, and replaced with suitable material and compacted in compliance with the design. If existing material is suitable, it may be removed and reinstated into the works, suitably compacted. This will require the following:

1. Removal of unacceptable base material and stockpiling it for later removal to suitable disposal site, Or,
Removal of acceptable base material and stockpiling it for later replacement at the same location

2. Offloading and stockpiling of new base material
3. Carting away of unsuitable material, by loading onto a truck
4. Disposal of waste material at an approved location, in compliance with requirements of the engineer

Areas identified for vegetation may also require removal of existing surfaces and replacement with suitable topsoil, with similar steps as outlined above, in relation to stockpiling of waste and new material, loading and offloading, and placement of material.

Possible Impacts

The works will be conducted fairly close to the Soufriere River and Bay, and runoff during heavy rains may end up in the river and sea. It is critical that these works do not contribute to degradation of these resources through chemical pollution or sedimentation. Earthworks can lead to adverse environmental effects, in particular the risk of sedimentation in the river and sea which may negatively impact the coral reefs. Large areas of exposed soil or fine aggregate will either cause dust pollution or quickly erode and then cause sedimentation in downstream drainage.

Loading or offloading of trucks (for removal of unsuitable material or delivery of new material) whether manually or with an excavator, may have the following impacts:

1. Traffic delays if trucks or excavators encroach into active traffic lanes
2. Damage to passing vehicles or injury to drivers or pedestrians if material falls during the loading or offloading process

Poor placement of spoil material may have drainage, sedimentation, and dust issues associated.

Impact Mitigation

The following guidance should be followed during construction for mitigation of adverse earthworks impacts:

Scheduling

1. Undertake all vegetation clearing in a phased manner in accordance with the approved construction programme to minimise large exposed open areas for long periods, to minimise the possibility of soil erosion.
2. Backfill and grade excavated areas as quickly as possible. Use cut material or recycled demolition waste from elsewhere on site where appropriate.
3. Re-vegetate cleared areas as quickly as possible, using approved species.
4. Undertake earthworks when conditions are suitable.
5. Stabilise exposed areas as soon as practicable after construction.
6. Remove waste stockpiles or use up material stockpiles quickly, to reduce the risk of sedimentation. Stockpiles must be suitably covered and confined to reduce risks of dust generation, siltation and blockage of drains.
7. Ensure supervisors regularly visit to clearly control the extent of clearing and earthworks.

Prevention of Dust, Mud, Erosion and Sedimentation

1. Integrate strategies to effectively control sediment and protect water resources. The following principles should be followed to minimize the volume of contaminated runoff generated:
 - Divert clean water away from exposed soils and working areas.
 - Prevent contaminated water from entering water courses untreated.
2. Use existing (paved) roads to the extent possible to minimize sediment generation by equipment tracking through the site.
3. Wet stockpiles as required to mitigate dust issues.
4. Any drain clogged by construction material or sediment must be unclogged as soon as possible to prevent overflow and flooding.
5. For vegetated areas, establish and maintain temporary drainage and sediment control during and after the construction period, until the site has stabilized.

Other

1. Minimise ponding of water that may encourage mosquito breeding.

Chance Finds Procedure (CFP)

Physical cultural resources include monuments, structures, works of art, or sites of significance, and are defined as sites and structures having archaeological, historical, architectural, or religious significance, and natural sites with cultural values. This includes cemeteries, graveyards and graves.

Consultations and field investigations during the design phase have not identified any known or possible sites of physical cultural resources (PCR) that could be directly affected by planned project activities.

If sites of cultural value are found during the course of the works, the following Chance Find Procedures (CFP) for identification, protection from theft, and treatment of discovered artifacts should be included in the bid documents and followed by the contractor, project supervisor, and all responsible local authorities. The contact details of the archeological expert/department should be made available prior to the start of the works so that if required they can be contacted quickly to avoid delays.

1. The Contractor will issue a STOP WORK order in the vicinity of the find;
2. Contractor will inform the Project Engineer;
3. Install temporary site protection measures such as warning tape of avoidance signs- establishment of restricted area around the Chance Find;
4. Project Engineer will record details (location and description) of the find and inform the local/District archeological department and Project Manager;
5. Inform project personnel about Chance Find and restricted area;
6. The archeological expert will document find, perform a preliminary evaluation to determine whether the Chance Find is cultural heritage and if so, whether it is an isolate or part of a larger site or feature;

7. Artefacts should be left in place if possible; if materials are collected they will be placed in bags and labelled by an archaeologist and transported to the relevant agency. **Artefacts are not allowed to be taken by any Project personnel as personal possessions;**
8. The find should be documented via the use of photography, notes, GPS coordinates and maps, as appropriate;
9. If the Chance Find proves to be an isolated find or not of cultural heritage, the archeologist will authorize the removal of the site protection measures and the resumption of activity in the area;
10. If however, the archeologist confirms the Chance Find as a cultural heritage of significance, the relevant national authority will be informed within 3 days of that determination and initiate discussions about treatment;
11. Prepare and retain archaeological monitoring records including initial reports whether they are later confirmed or not. The record shall include coordinates of all observations to be retained by the project;
12. Develop and implement treatment plans for confirmed finds using the services of qualified cultural heritage experts;
13. If a Chance Find is a verified cultural heritage site, a final Chance Find report shall be prepared once treatment has been completed;

While investigation is on-going, there will be coordination with project personnel aimed at keeping them informed about the status of and schedule of the investigations into the chance find. Project personnel will also be informed as timing of the resumption of project activities in the vicinity of the find.

Relevant findings are to be recorded in Supervision Reports. Implementation Completion Reports will assess the overall effectiveness of the project's cultural property mitigation and management activities.

Mitigation of Noise, Vibration and Dust Risks

1. Take measures to minimise dust, noise and vibration generation.
2. Restrict working hours. Where activities take place outside the hours of 7:00 am to 6:30 pm, adopt appropriate measures to reduce noise levels. No construction work should be conducted within 200 m of any occupied building outside of these hours.
3. The contractor's public awareness plan must incorporate the following:
 - Inform adjacent building managers or occupiers as appropriate, of the proposed timeframe for operations in their area, and as far as possible;
 - Inform the public and adjacent residents in advance of any work activities to occur outside of normal working hours or on weekends.
4. Store cement within a shed or container.
5. Utilise or remove (as appropriate) stockpiled materials as quickly as possible to minimize quantities exposed to wind.
6. Wet stockpiles and exposed areas as required to minimize dust generation.
7. Cover friable materials in stockpiles with a tarpaulin or other suitable material, to minimize dust emissions and erosion.

8. Cover/secure granular/light loads brought on site, and waste materials brought off site by a tarpaulin to minimize dust emissions and blowing of debris off vehicles during transportation.
9. Erect hoarding at staging areas where there is a risk that neighbouring users may be affected by noise and dust.
10. Erect suitable fencing on the worksite perimeter, to define the boundary for workers and the public.
11. Minimise quantum of mud and dust tracked onto the public roadways from this or any site.
12. Keep the surrounding environment free of debris to minimize dust.
13. Ensure that trucks are loaded and driven in a manner which does not result in spillage. Do not overload trucks. Ensure that all truck tailgates and dropsides are properly secured, there is no overloading of loose materials above truck sides, and all loads are properly secured.
14. Public roads which have material deposited on them as a result of the activities of the contractor or his agents are to be cleaned and kept free of mud, soil and other materials. The contractor will be responsible, at his own cost, for cleaning up spillages or shed loads without undue delay.
15. Fit all moveable plant with effective dust suppression equipment and operate and maintain plant in accordance with the manufacturer's manuals.
16. Ensure that noise specifications for equipment are compliant with acceptable international standards for the occupational environment. Noise suppression equipment or systems supplied by manufacture will be utilized.
17. Locate project equipment within the defined works area at all times, except when transiting on or off site.
18. Ensure that there is no excessive idling of construction vehicles at sites.
19. No burning of construction / waste material is permitted.

Mitigation of Pollution from Solid and Liquid Waste and Hazardous Materials/Wastes

General

1. Take all necessary precautions to prevent land and water pollution.
2. Take particular care when construction activities and operations are carried out in the vicinity of drainage systems and waterways to ensure that pollution does not occur.
3. Locate areas of high pollution risk away from water courses and drainage paths. These include material stockpiles, fuel and chemical storage, refuelling areas, and laydown/site compound/parking areas.
4. All waste will be collected and disposed of properly in approved landfills by licensed collectors.
5. The records of waste disposal will be maintained as proof for proper management.
6. Construction related liquid wastes must not be allowed to accumulate on or off the site, or to flow over or from the site in an uncontrolled manner or to cause a nuisance or health risk due to its contents.
7. The Contractor's Waste Management Plan is to be reviewed and approved by the Department of Environmental Health and the Solid Waste Management Authority.

Solid Waste

1. Abide by the provisions of the Saint Lucia Solid Waste Management Authority Act and the Litter Act.
2. Plan for collection and disposal of solid waste as part of a site management plan, to address the following requirements:
 - a) Size solid waste receptacles on the assumption that solid waste will be carted off site to a prescribed schedule.
 - b) Implement requirements for provision of adequate non-polluting worksite sanitary facilities including:
 - a. Provision of a sufficient number of adequate waste receptacles across the site (including appropriate and accessible containment for worker food waste).
 - b. Location of suitably sized solid waste receptacles to minimise possible adverse traffic safety, environmental and aesthetic impacts.
 - c. Do not permit solid waste to enter drainage or coastal waters.
 - d. Observation of legal requirements for proper containment of the waste.
 - e. Regular solid waste removal from the site, with transportation to be in compliance with standards set by the Saint Lucia Solid Waste Management Authority. Arrange for daily collection of putrescible waste.
3. Enforce worker use of appropriate, accessible solid waste disposal facilities.
4. Prohibit burning of waste on site.
5. Dispose of solid waste at the approved disposal site.
6. Reuse and recycle materials where possible.
7. Keep soil/spoil and green waste separate from other construction waste, to be reused on or near the site where possible, with appropriate sediment control, or taken to approved spoil disposal site or landfill as appropriate.

Chemicals

1. Do not use paints with toxic ingredients or solvents or lead-based paints. This is prohibited.
2. Do not use banned chemicals. This is prohibited.
3. If termite treatment is to be utilized, appropriate chemical management measure will be implemented to prevent contamination of surrounding areas and use only licensed and registered pest control professionals with training and knowledge of proper application methods and techniques.
1. Take particular care to ensure that concrete mix trucks are loaded and driven in a manner which does not result in spillage.
2. Prohibit application of fertilisers and pesticides on site.
3. Minimise solvent use.
4. Minimise and carefully control use of chemicals.
5. All hazardous or toxic substances are to be stored in safe containers labelled with details of composition, properties and handling information.

Hazardous Solid and Liquid Wastes

10. Properly dispose (recycle or transport to an appropriate facility) solvents, oils, and other hazardous waste in consultation with the Saint Lucia solid Waste Management Authority.
11. Reduce the amount of hazardous waste generated through use of alternative solvents or practices.
4. Do not mix wastes, in particular, separate waste oils for possible reuse as directed by the Solid Waste Management Authority.
5. Place containers of hazardous substances in a leak-proof container to prevent spillage and leaching.
6. Transport wastes by specially licensed carriers for disposal as directed by the Solid Waste Management Authority.

Measures to Minimize Depletion of Finite/Non-renewable Natural Resources

1. Minimise wastage, thereby minimizing requirements for transportation to disposal sites with its attendant impacts.
2. Reduce haulage requirements by re-using materials as described below, as close to the point of generation as possible.
 - a) Utilise resources available on site to the extent possible within the standards set, and maximise re-use of waste materials to the extent possible, as approved.
3. Conserve water and power.

Emergency Procedures to be Instituted

1. At the project planning stage, it is essential to think through the possible incidents and emergencies which could arise during construction works and plan accordingly (risk assessments). These may include:
 - pollution incidents – spillages, failure of temporary works, vandalism, fire, etc.;
 - extreme weather events – heavy rainfall, flooding, high winds.
 - Accidents.
2. Put in place an emergency response plan on site with a procedure for dealing with emergencies and communicate this procedure to all site staff before works commence. This plan must be approved by the client before works commence.
3. Site staff responsible for taking action in emergencies must be:
 - aware of their responsibilities;
 - trained in the appropriate response and must know how to use the necessary equipment such as spill control equipment and shut-off valves.
4. Refer also to the preliminary occupational health and safety plan for the project, for further information on emergency response requirements.

Appendix V - Site Management OH&S Guidance



SITE MANAGEMENT OH&S GUIDANCE

Introduction

Accidents do not just happen. They are caused because someone acted unsafely or failed to act in a responsible, safe manner. This document sets out an Occupational Health and Safety Guidance for the Construction of a building to house Concessionaire's Booths as part of the Old Trafford Complex Upgrade and contains information and procedures to provide for the occupational safety and health of personnel on the site. The Government of Saint Lucia is committed to providing a safe project environment free from recognized hazards. This can only occur if everyone cooperates and becomes safety conscious.

In general, the relationship of on-the-job activities to health effects is not well understood, especially those relationships between continued exposure over long periods of time and the resulting impact on an individual's health. As a result, this OHS Guidance takes a conservative approach in an attempt to reduce the overall occupational exposure of individuals to workplace hazards.

Site Management

The contractor will manage the site in accordance with the requirements outlined in the project contract document and that of the Development Control Authority with respect to the above-mentioned project.

- Proper lockable storage containers will be provided on site for the duration of the project. Bulky storage location, fixed plant/machinery, other temporary building, garbage disposal tipping point for collection will be established on site in a manner to avoid inconvenience to workers and the general public.
- There will be no vehicular access across the work site.
- The work site along the access road will be enclosed with hoarding to control access to the site. Entrance gate will be provided.
- No pedestrian access will be allowed across the work site.

Sequence of Works for the Preparation of the Site

- The site preparatory works will commence with the contractor identifying and marking with proper signage the main working area and all necessary caution signs warning of works in progress and danger zones/points inclusive of the limit of the works location. All potential hazards and risk factors will be identified and all necessary control measures will be put in place to mitigate against those factors.
- Site office, and lockable storage facilities will be established on site in the selected agreed location.
- Potable water will be established on site.
- Toilet facilities are a minute walk away from the project site and easily accessible.
- All stockpiling of bulking materials will be done in clean storage area and will be delivered/removed in a manner to avoid contamination.

Material Delivery and Management

Vehicles transporting construction material will enter the site through the designated access route and will be directed to their designation holding/storage areas. All off loaded vehicles will be removed from working zone immediately.

All materials being delivered to site will be checked to ensure conformity to project specifications.

The management and control of all construction vehicles entering the work site will be controlled by the contractor's site personnel/s responsible for procurement.

All construction personnel vehicles will be parked in the designated parking area to be identified by the contractor. Visitors to the work site will be required to use the same parking area or along the main road in a manner to avoid obstruction to vehicular traffic.

Material Storage and Protection

No materials will be left within the working zone at the end of the day. It will be removed and taken back to the storage point.

Apart from bulky materials all other materials will be stored in lockable containers/shed.

Site Safety Policy for Users/Public During the Works

The approach to the works will be methodological to ensure that any inconvenience to third parties all employees and the general public will be minimized. All public access will be kept free from obstruction due to construction traffic and proper signage will be placed to give indication of disruption of the regular flow.

The contractor shall provide a healthy and safe work environment, together with being responsible for the health and safety of all employees.

The contractor must be dedicated to the objective of eliminating the possibility of injury and illness and shall take all reasonable precautions to prevent harm to all workers.

All open trenches will be properly protected with all appropriate signage and safety nets.

The contractor's supervisors will be accountable for ensuring that workers use all safe work policies and PPE to protect their health and safety during site operations and will from time to time provide the necessary training to supervisors in OH&S.

The workers, as part of their duties will be encouraged to report to the supervisor or site manager, as soon as possible any unhealthy condition, injury/illness to themselves/others which occur on the work site.

The contractor will provide the Necessary Personal Protective Equipment (PPE) to workers. Workers will be responsible for the proper maintenance of all PPE issued to them and is to report any faulty PPE item. The PPE will be as listed:

- **Hardhats**
- **Footwear**
- **Gloves**
- **Safety goggles**
- **mask**

Site briefing shall be done daily to emphasize the importance of safety and to ensure all construction employees have the necessary safety gears.

All ladders and scaffolding once in use must be properly secured with proper platform used on scaffolding.

A medical first aid kit shall be kept on site at all times during the duration of the works.

A safety officer shall be employed full time on the project by the contractor.

All accidents will immediately be verbally reported to the employer and the insurance company, followed up by a written report after a full investigation and assessment is done by the contractor safety officer. A copy will be sent to the Labour Department as stipulated by the labour Act.

The COVID-19 protocols for quarries, concrete and construction sites where practical, will be adhered to. All employees or persons entering site will be required to follow all the established protocols. The site supervision will be responsible for the management of the outlined protocols in the attached COVID-19 document.

The sanitary measures will be provided on site to prevent the spread of COVID-19.

The measures are as listed below:

- 1. Hand washing stations**
- 2. Supply of potable water**
- 3. Provision of hand sanitizer**
- 4. Provision of disinfectant**
- 5. Provision of cleaning products**
- 6. Access to washroom**

The contractor's workforce will be limited to the required amount as per the COVID-19 requirement and the employer's instruction for additional resources.

NB: Any employee showing signs of flu symptom will immediately be requested to leave the site and advice to visit the nearest Respiratory Clinic for assessment and case management. Workers will be monitored throughout the duration of the project for any of the symptoms.

Site Waste Management Plan

Site will be clean of construction waste once generated and taking to the garbage collection point within the secured compound. Garbage will be disposed weekly.

Users of the site will comply with the site rules established.

Quality Control Plan

Introduction

This Quality Control Plan (QCP) is for the purpose of ensuring remedial and construction procedures are performed in compliance with the contract plans and specifications. This will provide a means to properly maintain effective control on the project. The quality control measures includes the following:

- Quality control organization
- Methods of performance
- Documentation
- Enforcement of quality control operations established by the employer and the contractor including all testing and inspection.
- Inspections to be performed

Quality Control Organization

Site Manager

Overall management of the QCP will be that of the contractor through the responsibility of the site manager. The site manager will have the authority to act on behalf of the contractor in all construction quality control matters and will be responsible for ensuring that the all materials and work comply with the contract details and specifications.

All workers shall be brief on the project requirements and specification by the site manager, and their role will be to ensure all aspect of the works meet those contract requirements.

The site manager will communicate daily with the contractor's project manager on all QC issues and will work on resolving any problem and implementing corrective measures. Those measures will be used for any recurring issues of a similar nature.

The site manager will ensure that:

- Appropriate resources are allocated to the project and balanced to ensure best value to sub-contractor
- He will ensure all testing of materials prior to use, as per the contract requirement are undertaken.
- He has the authority to stop any work that does not meet the contract requirements.
- Competent resources are assigned to the project various tasks to ensure it's aligned with the project needs.

The site manager responsibilities include:

- contractor coordination of works
- Acting as site Liaison between contractor and employer.
- Maintaining charge of all field operations.

Documentation

The QCO will record project activities in a daily quality control report maintained on site at all times. All site activities, site inspection and field testing of material will be recorded daily, along with any unacceptable site occurrences or deficiencies and the associated corrective actions.

The QCO will employ documentation methods that will allow for the following:

- Performing and documenting field inspections
- Preparing daily quality control reports
- Scheduling, reviewing, certifying and managing project submittals
- Maintaining the submittal register
- Providing coordination of required quality control testing reviewing results and submitting results
- Coordinating, documenting and tracking preparatory, initial and follow up inspections
- Tracking construction deficiencies and ensuring timely corrective action.
- Coordinating and recording field sampling activities.
- Discussions on quality and technical issues.

The QCO is responsible for ensuring all observations, and checks are made and documented in the plan sheets being used on the project.

All suppliers will be recorded in the project procurement file for ease of reference.

Enforcement

All tests will be done as per the contract requirement outlined for material testing and sampling. All results will be submitted to the employer prior to incorporating in the project. Any result that doesn't meet the requirement for material sampling will not be used and new sample submitted for testing.

The contractor will be responsible for ensuring total compliance of field work to the project specifications.

Inspection

To ensure that all construction and remedial activities comply with the project specifications; inspection will be in three phases namely: preparatory inspection, initial inspection and follow-up inspection.

During construction all works to be conceded will be inspected by the QCO firstly and issues with quality will be flagged and instructions given for remedial works or additional works to ensure compliance with project specifications.

A joint inspection will be scheduled for approval from the employer's agent. All approvals will be required to be documented on an inspection form for the section of works inspected and signed off by the employer.

The document will be referenced and photos attached and filed in the project quality control folder.

Test forms, inspection forms and material receipt forms will be made available for quality control and will become part of the project contract document.

General Safety Rules (worker code of conduct)

The following general safety rules should be clearly explained to all workers before the project commences. Each worker is required to sign a document containing these rules, confirming that they understand and agree to abide by them. One copy will be kept on the worker's file, and another will be retained by the worker.

1. Practical jokes and horseplay have no place on the job. Any employee participating in such activities shall be subject to disciplinary action.
2. Consumption of alcoholic beverages and/or use of illegal drugs on the job or during working hours is prohibited.
3. All hazard warning signs are to be obeyed.
4. Only personnel properly authorized and trained are to operate equipment.
5. All machinery and equipment are to have appropriate safety guards installed in accordance with the manufacturer's recommendations and good safety practice. The guards should not be removed except for service.
6. Appropriate clothing suitable to the type of work performed is to be worn:
 - a) Bare feet or sandals are not permitted in any work area. Safety boots must be worn.
 - b) Loose clothing is not to be worn near machinery or equipment with moving parts.
 - c) Jewellery such as rings, identification bracelets, etc., is to be removed when work involves climbing, material handling or operating mechanical equipment.
7. Personal protective equipment (PPE) and/or clothing is to be worn as required. Hard hats should be worn at all times by workers. In addition, protective gloves and goggles should be worn around welding

equipment, cutting equipment, where there is active breaking or cutting of rock, blocks or other materials, and when involved in concrete mixing and/or placement activities.

8. All accidents, no matter how slight the injury, and all near misses are to be reported as soon as possible to the immediate supervisor.

Emergency Response

1. Develop an emergency /evacuation response plan and submit to the MOT for review and approval by the agency responsible for Disaster Management.
2. There should be a vehicle and driver within 5 minutes of any worksite, available in the event transportation is required for an injured worker(s). Supervisors must have charged cell phones on their persons with sufficient credit and the following numbers stored:
 - a) Nearest ambulance (Soufriere Fire Station)
 - b) Nearest fire appliance (Soufriere Fire Station)
 - c) Nearest health centre (Etangs, Choiseul)
 - d) Soufriere Hospital emergency room
3. Limit fuel storage on site.
4. Prohibit smoking on site, with prohibition signage erected.
5. If a hurricane or other cyclonic activity threatens, tidy the site, ensure drainage channels are clear and secure light items that may become airborne under high wind conditions.

Housekeeping

The following safety procedures shall be followed:

1. Keep work areas and storage facilities clean, neat and orderly.
2. All aisles, stairways, passageways, means of egress, and entrances shall be kept free from obstructions at all times.
3. Do not place supplies on top of lockers, hampers, boxes, or other moveable containers at a height where they are not visible from the floor.
4. When stacking materials for storage, make sure the base is firm and level. Keep stacks level and not too high. Keep aisles clear and with adequate space to work.
5. When storing materials suspended from racks or hooks, secure them from falling, and route walkways a safe distance from the surface beneath.
6. When storing materials overhead, provide adequate toeboards to prevent objects from rolling over the edge.
7. Tools, equipment, machinery, and work areas are to be maintained in a clean and safe manner. Defects and unsafe conditions shall be reported to your supervisor.
8. Return tools and equipment to their proper places when not in use.
9. Lay out extension cords, air hoses, water hoses, ladders, pipes, tools, etc. in such a way as to minimize tripping hazards or obstructions to traffic.

10. Clean up spills of non-hazardous materials immediately to avoid hazards. For spills of hazardous materials contact the Solid Waste Management Company and Environmental Health for further guidance. In the event the removal cannot be done immediately, the area must be guarded with signs and/or ropes.
11. Nail points, ends of loops, or metal scrapings, etc., must not be left exposed when packing and unpacking boxes, crates, barrels, etc. Nails are to be removed as soon as lumber is disassembled.
12. Articles should be stored in a manner to prevent persons from coming in contact with sharp edges or points.
13. Oily and greasy rags shall be put in a closed metal container.
14. Adequate lighting shall be provided for the protection of both employees and the public.
15. Circuit breaker boxes should be kept closed at all times and free of any debris. Keep a three (3) foot area in front of circuit breaker boxes clear of materials.
16. Secure the site during non-working hours.

Training

A structured system of education and training should enable both contractor and employees to identify and manage the risks involved in excavation and keep abreast of means of limiting hazards and controlling risks.

General

1. The critical role workers play in keeping the jobsite safe should be emphasized to workers. Train employees in safe systems of work and safe work practices.
2. Train workers in the appropriate use of PPE, and first aid.
3. Train site workers to recognize and avoid unsafe conditions and to follow required safe work practices that apply to their specific work environments e.g. working in confined spaces, operating heavy equipment, working on foot in the vicinity of heavy equipment.
4. Hold daily tool box meetings at the job site to discuss and report hazards and close calls, and to discuss safety conditions for performing the day's tasks.
5. Convene regular health and safety meetings (at least once monthly and within 48 hours of any accident or near miss) with workforce to emphasize safe work practices and expectations.
6. Orient new workers in ESHS requirements generally, and specifically in relation to assigned tasks, before setting them to work.

Appendix VI - Grievance Log



**OECS REGIONAL TOURISM COMPETITIVENESS PROJECT
IDA CREDIT # 6000 LC
GRIEVANCE LOG**

#	NAME /if not anonymous	ADDRESS /if not anonymous	CONTACT NO. /if not anonymous	DATE	SUB PROJECT NAME	DETAILS OF GRIEVANCE	DOCUMENTS PRESENTED	RECORDED BY	Status of the grievance: Solved, in process, drop, and date of solution.	COMMENTS
1										
2										
3										
4										

Appendix VII – Safeguards Quarterly Report Template



MINISTRY OF TOURISM, INFORMATION & BROADCASTING, CULTURE & CREATIVE INDUSTRIES

OECS REGIONAL TOURISM COMPETITIVENESS PROJECT

IDA Credit #6000-LC

Environmental and Social Safeguards Quarterly Report

[June 30, 2021]

A. Summary

The Upgrade to the Old Trafford Complex in Soufriere was initiated by the Soufriere Constituency Council (SCC) to increase the number of concessionaire booths within the complex, and in that way create opportunities for employment in the district. The major activities undertaken to this point are the screening exercise to identify PAPs and discussions held with the Project Design Team to discuss the scope of the project and to identify the footprint of the project. Consultations have also been held with the SCC represented by the Mayor and will continue throughout the project. The Screening Report has been approved and the draft ESMP prepared. The Promotion of the GRM and the issuing of bids for tender are the significant activities which will be undertaken during the next reporting period.

B. Sub-projects Activities

SUB-PROJECT Activity	STATUS	ADVANCES & CHALLENGES	NEXT STEPS
Old Trafford Complex -Upgrade	<ul style="list-style-type: none"> - Screening exercise held on February 02, 2021 and the report prepared and submitted to the Bank for review on June 07, 2021. 	<ul style="list-style-type: none"> - The Screening Report submitted to the Bank for review and received approval. - The Draft ESMP completed. - Large scale consultations still not possible due to COVID-19 restrictions. 	<ul style="list-style-type: none"> - Submit the ESMP to the Bank for approval. - Pre-bid site visit and meeting, - Presentation of the GRM to the Contractor and the SCC. - Issuing of Bids - Selection of Contractor. - Start of physical implementation.

and Program

C. Environmental Management Actions Items

The Screening Report is completed and the draft Environmental and Social Management Plan has been prepared and submitted to the World Bank for review.

D. Status of the Grievance Redress Mechanism

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

E. Context

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

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

F. Conclusions and Recommendations

Preparation of the bidding document and the call for tenders as well as the promotion of the GRM are the significant activities to be undertaken in the upcoming reporting period.

G. Annexes

REFERENCES

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