



ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

ANSE FERRE LOOKOUT

Ministry of Tourism, Investment, Creative Industries,

Culture and Information

| March 2023 |

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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
GCC	Gros Islet Constituency Council
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, Investment, Creative Industries, Culture and Information
NCA	National Conservation Authority
NEMO	National Emergency Management Organisation
ORTCP	OECS Regional Tourism Competitiveness Project
OSH	Occupational Safety and Health
PIU	Project Implementation Unit
PSC	Project Steering Committee
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SSO	Social Safeguards Officer
SLSWMA	St. Lucia Solid Waste Management Authority
PCR	Physical Cultural Resources
PPD	Physical Planning Department
PPE	Personal Protective Equipment
TOR	Terms of Reference
USD	United States Dollars
WASCO	Water and Sewerage Company

1. INTRODUCTION

The Ministry of Tourism, Investment, Creative Industries, Culture and Information 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.

It is further envisaged that the proposed initiatives as part of the implementation of the 2020 Saint Lucia Tourism Strategy will:

1. Increase local community participation and involvement in tourism, in order to increase the direct benefits derived by local community residents from the tourism sector;
2. Improve and upgrade the tourism product offering in Saint Lucia;
3. Alleviate poverty and reduce unemployment levels; and ultimately
4. Stimulate tourism-related economic activity with a view to enhancing the multiplier effect from Tourism, thereby contributing to economic and socio-cultural growth and development.

1.1 BACKGROUND

An area along the Millennium Highway has grown in popularity as a lookout for tourists who stop to view a keyhole feature, also called Cinderella's Slipper, in the cliff below. This area known as Anse Ferre is located in Ciceron in South Castries. The area has no infrastructure or amenities but this has not deterred tour guides and taxi drivers stopping along the highway to provide their guests with the opportunity to sightsee. Realizing the potential for economic activity in the area, young men from the Ciceron community have created self-employment opportunities entertaining tourists by jumping and diving off the cliff and are patronized by boating tourists as well as land-based tourist who stop along the highway.

Although the area is very popular, the parking of vehicles along the busy highway is not encouraged as the highway is heavily trafficked and a sharp bend in close proximity to the site makes the location even more precarious. For this reason, the plan to develop the lookout and park has the safety of visitors as a main objective, while the amenities constructed will add value to the experience of the visitors as well as provide a space where residents of South Castries can participate in other economic activities such as food and craft vending to secure their livelihoods.

2. PROPOSED SCOPE OF WORKS

The scope of the project is as follows:

1. Landscaping of the site
2. Construction of an interpretation Centre measuring 126m²
3. Construction of a vending area measuring 132m²
4. Construction of washroom 67m²
5. Construction of Office and storage area 50m²
6. Construction of 2 timber viewing Decks measuring 142m² and 223m²
7. Construction of a bar measuring 86m²
8. Construction of a bandstand measuring 18m²
9. Construction of a septic system
10. Erection of guardrails
11. Construction of walkways / footpaths and entry measuring 73m², 150m² and 65m²
12. Construction of a drop off point for coaches measuring 155m²
13. Training for residents in tourism related economic activities as requested by the residents

The Interpretation Centre will be covered and include electronic displays. The project has to meet the standards of the Fire Department before it is approved by DCA. The vending booths will cater for vendors with trays, and the NCA will decide the vending arrangements. In addition to the Interpretation Centre the vending area, office and storage, washroom, bar and bandstand will all be covered. All other areas are uncovered.



Visual placement of the various components

3. PROJECT SITE -ANSE FERRE / CICERON POINT

Ciceron is located in South Castries on the western side of the island approximately 3275 metres away from Central Castries. The community spans a wide area extending both to the East and West of the Millennium Highway at least 1000 metres above the road level to the east. The Millennium Highway is one of two major thoroughfares which links Castries to the districts to the south, east and west of the country. Residential areas in Ciceron such as Anse Ferre and Monkey Town are the closest to the highway and the proposed project area. The Millennium Highway Medical Complex and the Buckeye Oil Storage Facility are approximately 1124 metres and 1085 metres to the north and south of the project site respectively.

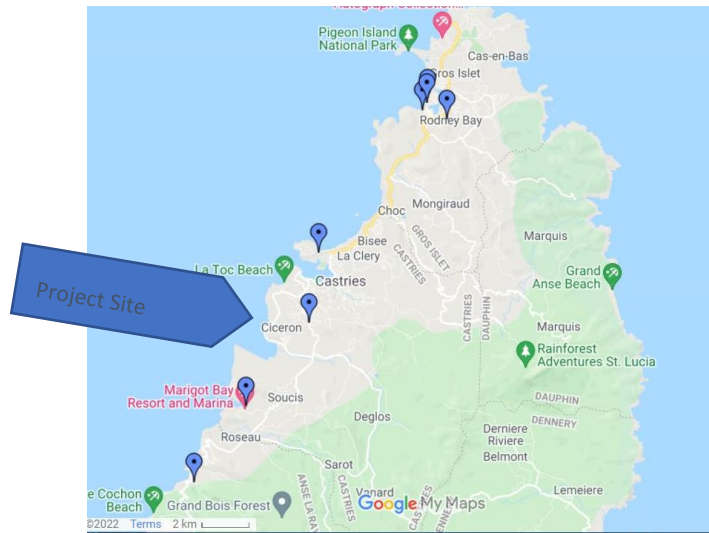


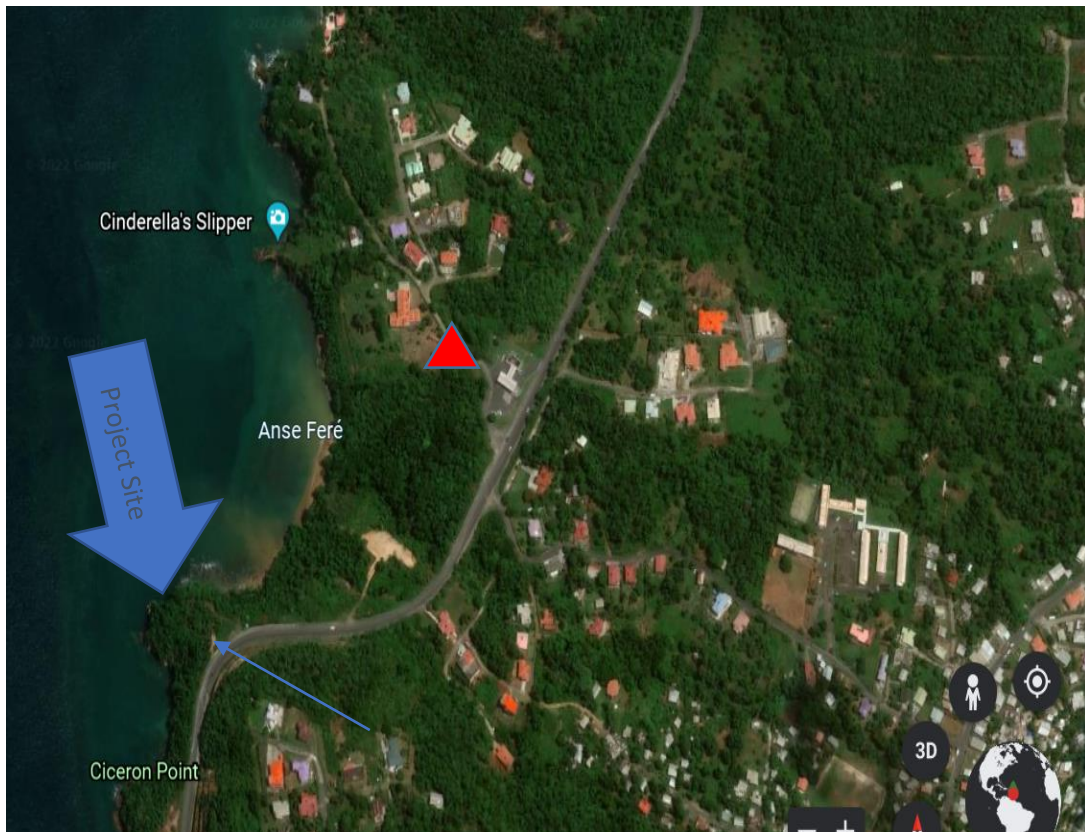
Figure 1: Map showing location of Ciceron

Characteristics

Anse Ferre is a cape in Ciceron at an elevation of 31 metres above sea level and 398 metres away from Anse Ferre Beach. The 6514 m² acre lot of land is mainly dry forest, densely vegetated with a variety of plant and bird species. The soil is arid and there is no agriculture or other type of economic activity ongoing at the site. The keyhole feature also called Cinderella's Slipper is 520 metres away and visible from the cape, and a major attraction for tourists who stop for sightseeing at that point along the highway. Another cape, Ciceron Point encloses the site and separates it from the Highway, and also serves as a data point for land surveying. The lot is jagged on the boundaries with fissures at many points where the sea is visible and tracks have been established as divers and spear fishers use these routes to access the beach below. Less than 100 metres away from the entrance to the project site is a sharp bend in the Millennium Highway. The adjoining lot is a vacant and also densely vegetated 2.66 acre privately owned lot which is currently on the market and being promoted as an ideal area for touristic development.

The proposed site is not in very close proximity to any densely populated residential areas and the nearest settlement is Monkey Town with approximately 40 houses, roughly 170 metres away and above road level at 80 metres and separated from the site by the Millennium Highway. Further away at 388 metres is the Anse Ferre community with approximately 16 households.

Institutional and business interests in proximity to the area are a Sol petrol station 442 metres away, the Millennium Heights Medical Complex 1124 metres away and the Buckeye Oil Storage Facility 1085 metres away.



 Petrol Station  Millennium Highway



The privately owned adjoining lot

3.1 SITE SPECIFIC ENVIRONMENTAL AND SOCIAL IMPACTS

As per World Bank Safeguards Policies, the ORTCP is classified as category B, meaning that any negative environmental or social 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. Nevertheless, 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. For this reason, the project team is working collaboratively with both the Departments of Forestry and Fisheries to ensure that the natural habitats are protected.

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.

The sub-project can be categorized as comprising simple works, and the possible environmental and social impacts would have to be classified as moderate. However, these impacts can be addressed through standard mitigation measures, listed in tables 5 and 6 during construction, as well as continuous consultation, communication, raising of public awareness before and during the construction period.

There is no possibility for involuntary resettlement of any kind during construction, since there is no land acquisition or temporary use of private lands during construction, neither is there any ongoing economic activity at the proposed site for construction. Further the impacts of the works should be moderate and not have such adverse effects that would require relocation of any nearby communities. Further, since the tour guides operate mainly from the beachfront, their activities will not be affected in any significant way by the construction activity.

To ensure that the activity is implemented within the stipulated guidelines and government regulations, the consulting architect is tasked with obtaining or ensuring that the following approvals are obtained: the Site Management Plan, and Traffic Management Plan approved by the Department of Infrastructure, Port Services and Transport (DIPE), Solid Waste Management Plan approved by the St. Lucia Solid Waste Management Authority (SLSWMA). Approvals or certification must also be obtained from the Fire Department. Additionally, it is required that the drawings be certified by an electrical engineer, a civil engineer and an architect. When all approvals are obtained, the DCA will provide the approval for commencement of physical implementation.

The site can be accessed from the Millennium Highway which is heavily trafficked throughout the day. Moreover, the Millennium Highway Project (MHP) is currently ongoing, with an anticipated completion date of February 2023, however, from all indications the project will go beyond this date, and there is a high possibility that the two activities will coincide, resulting in greater levels of traffic during working hours. This increase in construction traffic will compound the congestion problem along the highway particularly at morning and afternoon rush hours. As such the contractor shall observe all traffic regulations, the requirements of the Acts and By-Laws for regulation of traffic on main roads. The contractor will also develop a traffic management plan. Prior to commencement, the contractor shall erect barriers, signs and devices for the guidance of road users, especially the emergency response vehicles travelling to the medical complex, the protection of pedestrians and the public and to limit and enclose the site as necessary. Flaggers should also be utilized to direct vehicular traffic. Additionally, during stakeholder discussions, the Project Manager for the Millennium Highway Project indicated that the Anse Ferre Lookout Park project could benefit from signage erected by the MHP if implementation of the two projects coincide. The activity may also benefit from other mitigation measures such as the dousing of the road surface, public sensitisation and awareness campaigns and possible road closures during construction. Continued communication and close collaboration with the MPH project team will be necessary for ensuring that both projects can benefit from synergies resulting from the timing of the activities.

Related to the traffic concerns is the hazards associated with roadside storage of construction materials and parking of plant and vehicles. As such as part of the Site Management Plan the Contractor should plan for the temporary storage of construction materials and wastes, and the parking of construction plant

within the worksite only. However, if for any reason there is need to utilize the lot nearest to the site, permission will be sought from the owner, who is currently in discussions with the MoT regarding the development of the lot into a touristic investment. The negotiation process leading to the signing of the agreement will be well documented.

Another major concern is the build-up of mud and silt on the roadway. Although the area appears to be quite arid, if the work is implemented during the hurricane season, muddy conditions can result from excavation and the movement of construction traffic on the site. The Contractor will be responsible for putting measures in place to maintain the Highway in a motorable condition at all times and keeping the site clear of mud/silt as well.

Due to proximity to the highway, and the potential to affect commuters, the Contractor shall ensure that any nuisance caused by dust is kept to a minimum by utilizing appropriate measures including regularly dousing the ground, and clearing out any dust or mud which gets on the roadway. The level of noise during construction should not pose a major problem as the closest residential and business areas are fairly distant from the site and the continuous flow of traffic may help to drown out the construction related noise. Traffic management during operations is also of paramount importance to avoid accidents and further compounding the traffic congestion on the highway. For this reason, assistance will be sought from the Department of Infrastructure to determine which traffic management measures can be best utilised in the area.

Measures will be implemented to ensure that there is no destruction of rare plant and animal species. This process began, with the participation of the officers of the Department of Forestry who visited the site on February 10, and 21 2022 when an assessment of the fauna and flora of the area was undertaken and subsequently a report was prepared to provide guidance to the design consultant as well as the contractor during the clearing and revegetation of the site. While the report recognized the potential of the site for ecosystem tourism development to generate livelihoods for the constituents of Ciceron, it also underscored the intrinsic value of species present for soil erosion control, natural aesthetic and habitat protection. As a result, the following recommendations for the integral development of the area were put forward.

- Limited clearance of trees on the cliff area especially to the west and south of the site to limit the potential soil erosion and rockslides. That is a 15-meter buffer zone as is demarcated in red on the map. Recognizing the need to enhance the viewing points, it is recommended that when clearing will be taking place that the Forestry Department be invited to identify important trees and to advise on best practice for clearing. The contractor will coordinate with the Forest Department.
- Where trees must be cut on cliff edge, replanting these areas with species such as with Fat Poke (*Chrysobalanus icaco*). This species is very adaptable to dry environments, is of short stature and resistant to fires. The Fat Poke fruit is edible, so it will enhance livelihood options and serve as food for attracting wildlife species. This tree also has medicinal properties that can enrich the

opportunities for interpretation. Calabash can also be planted because of its short stature and cultural value.

- The clearing of all *Leucaena* on the site (*Leucaena leucocephala*), except on cliff edges. This is an exotic invasive species which can quickly spread through the entire site and is difficult to exterminate once established.
- Avoiding the indiscriminate planting of ornamental trees as they do not blend well with the natural environment and some of them are potentially invasive.
- Where there is a need for enrichment, the selection of species that are indigenous to the site's natural environment- for example calabash and bay leaf.
- That two species of trees on the site should be left untouched; the silk cotton tree (*Ceiba pentandra*) because of its impressive stature and cultural value, and Zolivyé (*Buchenavia tetraphylla*) because of its rare status.
- The signage of important tree species. The Forestry Department is available to provide technical support towards this exercise.

The Department of Forestry will provide support and guidance throughout the construction, particularly, at critical stages such as the clearing and revegetating of the site

Another design consideration highlighted by stakeholders is to ensure that all the structures blend into the site and the surrounding area, and for that reason mainly timber and concrete would be used for the construction. Based on the guidance of the World Bank the design will also provide universal access.

Another potential impact is that of construction runoff and debris entering the marine environment. For this reason, the Contractor shall take all necessary precautions to prevent land and water pollution, such as ensuring the proper tidiness of the site and removing rubbish and waste promptly from the site. Disposal of site waste and rubbish shall comply with the regulations of the local Waste Management Authority. Additionally, the septic system which is installed must be designed so that the water from the soak away should be clear and odourless and should not cause any major environmental problem. The Design Consultant will have to ensure that the necessary approvals are obtained, and the Project Engineer must ensure that the contractor builds to the required specification, while the NCA with support from the Environmental Health Department must monitor the operations post construction to ensure that the system functions effectively. The design should also allow for rainwater harvesting which can be used in the washrooms as well as for landscaping.

Due to the location on a cape, there is the potential for soil, and sediment from excavation and construction runoff entering the marine environment and causing pollution of the marine environment. For this reason, it is paramount that mitigation measures for trapping the soil and sediment be implemented.

There are at least three tracks which have been created by the spear fishers and divers who walk through the site to gain access to the sea below. During construction the users may not have access to these tracks, and it will be necessary based on discussions with the users to identify and create alternative access routes to the sea. Nevertheless, the main access to the beach, which is mere yards away from the site, will not be impacted in anyway by the construction activity and will be accessible to the fishers throughout the construction period. The design also proposes the erection of guardrails in precarious areas to protect patrons during operations.

There are no public toilet facilities in close proximity to the site and in order to ensure public health and sanitation, the Contractor will be responsible for the provision of toilet facilities for the workforce. Additionally, the Contractor will be responsible for instituting measure for the Health and Safety of the workforce, inclusive of protocols for the prevention of COVID-19.

Site-specific mitigation measures are presented in this Environmental and Social Management Plan (ESMP) for all the Impacts that have been identified.

4. 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 the 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

<p>Department of Fisheries (DOF)</p>	<p>The Department of Fisheries is responsible for the promotion and regulation of fishing and fisheries in the fishery waters of St. Lucia and for connected matters. The mission of the DOF is to provide effective and efficient services in promoting sustainable development of Saint Lucia's fisheries sector through participatory management and sustainable use of the fishery resources.</p>	<p>The Fisheries Act No. 10 of 1984. Amended 31 December 2001.</p> <p>Fisheries Regulation Section 39, Statutory Instrument 9/1994.</p> <p>Fisheries (Snorkeling License) Regulations Section 39- Statutory Instrument 223 of 2000.</p>
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<p>Ministry of Health,</p>	<p>Through its Environmental Health Department, it has the responsibility for reviewing plans, monitoring and enforcing public health and sanitation regulations and practices, and promoting public awareness on matters relating to public health and the environment. These include practices that affect health such as food preparation, sanitation, solid waste management, liquid and solid waste disposal, dust and air pollution, water quality, some occupational health and safety matters.</p>	<p>Public Health Act of 1975 and attendant Regulations to present.</p> <p>No. 10, 11, 12, 13, 14, 15, 16, 18, 20, 21, and 22 of 1978]: Public Health [Nuisances] Regulations.</p> <p>Public Health [Offensive Trades] Regulations:</p> <p>Public Health [Communicable and Notifiable Disease] Regulations:</p> <p>Public Health [Water Quality Control] Regulations:</p> <p>Public Health [Apartment Houses, Guest Houses and Hotels] Regulations:</p> <p>Public Health [Swimming Pools] Regulations:</p> <p>Public Health [Disposal of Offensive Matter] Regulations:</p> <p>Public Health [Sewage and Disposal of Sewage and Liquid Industrial Waste Works] Regulations</p>
<p>Pesticides Control Board (in the Ministry of Agriculture)</p>	<p>Pesticides Control Board in the Ministry of Agriculture and is responsible for monitoring the importation and use of various chemical substances.</p>	<p>The Pesticides and Toxic Chemicals Control Act 1975</p>
<p>Department of Forestry</p>	<p>The Forest and Land Resources Division is the official body responsible for the direct management of Saint Lucia's</p>	<p>The mandate of the Forestry Division is guided by two pieces of legislation, the</p>

	forest reserves, for oversight of the management of all forests on Saint Lucia and for the protection and management of Saint Lucia's terrestrial wildlife. The Department is the agency with responsibility for the preservation and sustainable use of forests, nature and the benefits that they provide.	Forest, Soil and Water Conservation Act (1946) (Amended 1983) and the Wildlife Protection Act (1980).
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 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.	The Saint Lucia National Trust Act of 1975
National Conservation Authority	The National Conservation Authority (NCA) is the Organization which grants permission for the use of a beach and designated areas to host activities commercial and otherwise.	The National Conservation Authority (NCA) was established by Act of Parliament No. 16 of 1999. on April 30, 1999 and is

	<p>The NCA's mission is to identify, manage, conserve and generally provide stewardship over natural assets including beaches, coastal, protected and other declared or designated areas, in a sustainable manner and to provide ancillary amenities thereby contributing to the social and economic development of Saint Lucia.</p>	<p>governed by a Board of Management appointed by the Minister of Equity and Local Government.</p>
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5. CONSULTATIONS

As part of the obligations of the MOT, to fulfil requirements of the World Bank under the ORTCP, a rapid screening exercise was undertaken at the site on Thursday 10 February, 2022 to identify the extent and complexity of the potential environmental and social impacts, if any, and the socio-economic characteristics of people in the Project area. Present at the site visit were representatives from the ORTCP and the MOT, the Department of Forestry and Fisheries, the Architect for the project and four (4) members from the Ciceron Development Committee. Additionally, to gauge the interest and support of stakeholders in the proposed development consultations were held with the National Conservation Authority (NCA) which is responsible for management of beaches and parks, the St. Lucia Air and Seaports Authority (SLASPA), the Department of Fisheries (DOF) and the Department of Forestry (DoF) on February 02 2022. A community meeting was also held on February 02 2022 in the Ciceron community, with at least 40 residents in attendance. The Social Transformation Officer of the Ministry of Equity responsible for the area and members of the Ciceron Development Committee were among those who attended. On March 18, 2022 the Design Consultant met with stakeholders of the MOT to present the preliminary design , and to solicit their feedback. The stakeholders were generally pleased with the concept and agreed that the design could progress to the next stage. A presentation of the design to other Government stakeholders was held on April 26, 2022. Representatives from sixteen (16) agencies and departments were present at the consultations, namely, the St. Lucia Air and Seaports Authority (SLASPA) the Departments of Forestry, Fisheries, Environmental Health, Planning, Sustainable Development, Infrastructure and Crownlands. Also represented were the National Conservation Authority (NCA) Invest St. Lucia, the St. Lucia Tourism Authority, the Marine and Traffic Units of the Royal St. Lucia Police Force, the St. Lucia Fire Service, the Soufriere Marine Management Area (SMMA) and the St. Lucia Electricity Company (LUCELEC). The project design was also presented to the Chairman and technical officers of the DCA on February 06 2023.

Ongoing consultations spearheaded by the ORTCP, will be held. 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. Media such as Facebook and WhatsApp will be used to disseminate information about the project to the wider community, particularly, the youth. Radio and television announcements, liaising with representative groups such as the National Council of and for Persons with Disabilities and the Blind Welfare Association, as well as town criers will be used to inform

persons in vulnerable groups such as the elderly and persons with disabilities to keep them informed of the progress of construction activities as well as to promote the Grievance Redress Mechanism (GRM).

6. 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.

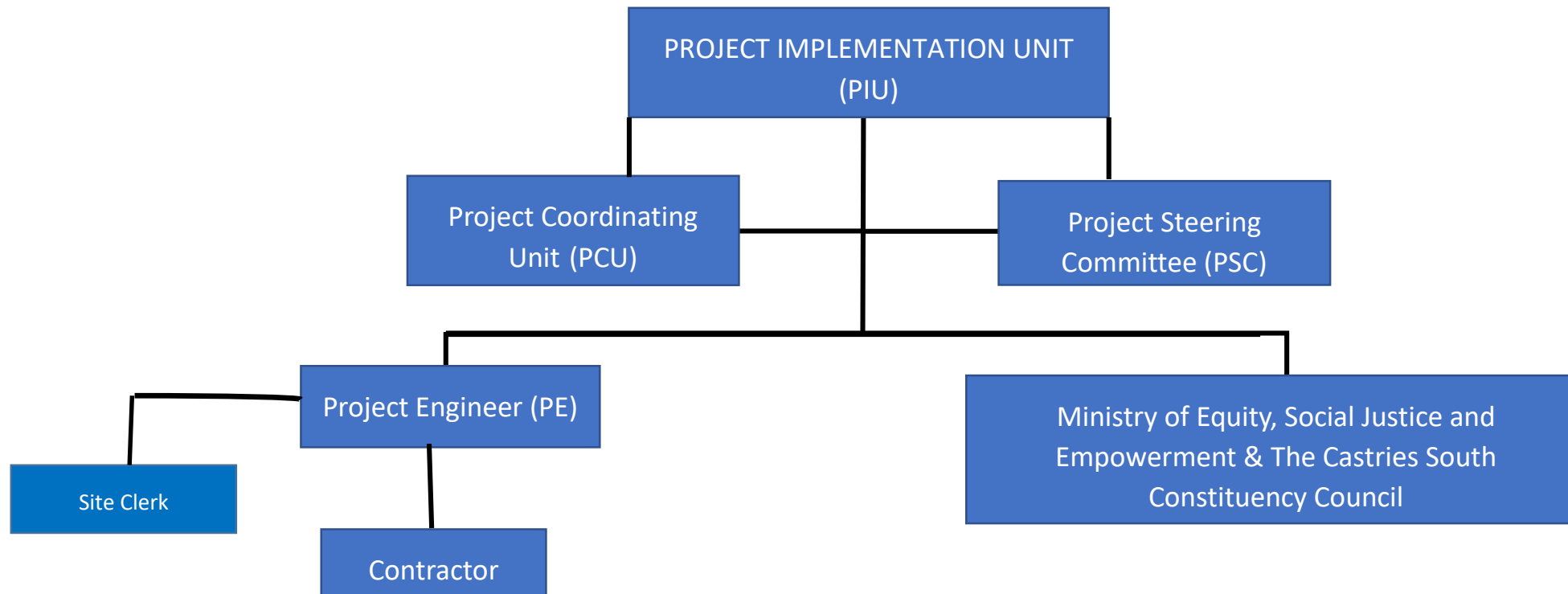
Efficient implementation of the recommended mitigation measures is necessary to avoid, minimise or offset adverse impacts and to promote beneficial impacts, resulting in an enhancement of the overall environmental performance of this activity. Effective environmental and social management can only be 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.
- Ongoing consultation and an accessible Grievance Redress Mechanism (GRM).

7. 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 the Clerk of Works.
- 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

- To provide support with the GRM

The Contractor

- Responsible for implementing measures to address all the social and environmental management requirements.
- Responsible for developing site specific plans as needed such as Traffic management plan, waste management plan
- Having a Code of Conduct that all workers must follow. It will include E&S measures that the workers are expected to follow and socially acceptable behaviour. All workers must sign the 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.

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, Environmental Health Department (EHD), Department of Infrastructure (DOI), Physical Planning Department (PPD), Labour Department, Public Utilities Department), the Department of Forestry and the Fisheries Department will have responsibility for monitoring based on their mandate and the day-to-day responsibilities of their respective institutions. As such, environmental and social 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 and social 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. Department of Forestry
4. Transport Board
5. Police – Traffic Department
6. Labour Department
7. Environmental Health Department
8. Fire Service
9. Water and Sewerage Company (WASCO)
10. St. Lucia Electricity Company (LUCELEC)
11. FLOW C&W Communications Plc.
12. National Emergency Organisation (NEMO)
13. National Conservation Authority (NCA)

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. PROJECT PHASES AND ENVIRONMENTAL AND SOCIAL MANAGEMENT

8.1 Pre-Construction Phase

For the purposes of environmental and social 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 (and social) 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 and social performance will be incorporated into the project plans at the full design stage. The bid documents should include the following:

1. This ESMP
2. Environmental and Social Best 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
- Construction Drainage Plan

It is recommended that these submissions should be reviewed by the relevant authorities such as: the Department of Environmental Health, the Development Control Authority and the Department of 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 supervision consultants and the ORTCP team. Overall primary responsibility for day-to-day construction activities and contract management, and therefore for environmental and social 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 NCA is expected to assume responsibility for management of the facility. The NCA 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 NCA's inspection and maintenance protocols. Responsibility for routine cleaning will continue with NCA upon completion of construction.

The NCA 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 NCA should have sufficient capacity to manage.

9. 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 and social 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 and social 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 attached to the MOT, specifically assigned as the Site Clerk. The Site Clerk, supervised by the PE, will undertake the role of Environmental Compliance Monitoring Officer and undertake systematic observation of all site activities. This person may have other responsibilities, as long as s/he is able to properly meet the environmental and social monitoring requirements. An employee of the contractor will also be responsible for Environmental Compliance Monitoring.

Monitoring will, for the most part, take the form of visual observations, and 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 be required to ensure that these are actually being implemented to the agreed schedule and in the required form. As information of the principal problem areas come to the fore, attention will be concentrated on activities which are known to be the most troublesome.

The ORTCP's Environmental Compliance Monitoring Officer or Site Clerk will report to his/her Project Manager/Engineer on a daily basis, using conventional report forms whose coverage will be extended to include key environmental and social matters, while the Safeguards Quarterly Report will provide a summary of the broader environmental and social issues encountered during construction, (*see Appendix VI for A Safeguards Quarterly Report Template which will 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 Environmental Compliance Monitoring Officer / Site Clerk regarding environmental or social 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/Manager has the responsibility to order a stop to any aspect of the works in the event where serious environmental damage or public nuisance/safety hazard is either imminent or has already been caused. In cases of incidents and accidents, the PIU will inform the World Bank within 48 hours and follow up action including root cause analysis shall be carried out as agreed with the Bank.

Bi- Weekly reports prepared by the Project Engineer 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. Informal discussions will be held with the residents of the community to ascertain whether and how they are impacted by the ongoing works.

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 and Contractor in attendance. The Environmental Compliance Monitoring Officer /Site Clerk 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. 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.

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

Table 4 ESMP Implementation Costs incurred by Contractors

ESMP Activity incurring cost	Estimated cost (XCD\$)
Signage for vehicular and pedestrian traffic management (12 signs @ EC\$ 1,200)	14, 400.00
Traffic safety provisions (barriers, cones, lighting, etc.)	4, 000.00
Environmental and Social Awareness Training including training on the Chance Find Procedure and the Code of Conduct	2, 500.00
Public announcements and communications with stakeholders	3,000.00
Total	23, 900.00

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. 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* to be applied by Contractors and *Occupational Health and Safety (OHS) Guidelines (Appendix III and IV)*. In some instances, mention is made of the *Traffic Management Plan which should be developed by the contractor*.
- 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 maximize 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. Rain water harvesting is planned and 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. <ul style="list-style-type: none"> • Contractor should develop and maintain a code of conduct for all personnel, including sub-contractors for site activities. The Code of Conduct will form part of the workers' and sub-contractor contracts. Worker training shall include sensitization on the CoC and interactions with the general public.

		<ul style="list-style-type: none"> • The CoC will prohibit all forms of SEA and SH. - The GRM will have a channel for the uptake of grievances related to SEA, SH and GBV.
	<p>1.3 Health and safety hazards to the workforce arising from participating in an inherently dangerous occupation.</p>	<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 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). - 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 the 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 muffers, 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. - The contractor should report accidents and incidents to the project implementation unit within 24 hours. - The PIU must report all incidents and accidents to the Bank within 48 hours of learning about the incident.

		<ul style="list-style-type: none"> - 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 Guidelines for preventing Covid-19.
	1.4 Environmental damage caused by the workforce.	<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 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. - 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 Anse Ferre Bay 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, under the guidance of the Forestry Department. - Contractor should submit a construction drainage plan for approval by relevant authorities, in particular, proposals for trapping eroded sediment.

		<ul style="list-style-type: none"> - Ponding of water that may encourage mosquito breeding will be minimised. - Final drainage design will minimise erosion and sedimentation by featuring the following: - 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 sea. - Directly connected impervious areas will be eliminated or maximized. - Use of pervious pavements should be maximized. Pervious paving would decrease stormwater runoff and reduce nonpoint source pollution. - High permeability concrete will be used for pathways. - 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 coastline to minimise impacts on marine environment.
	2.3 Smoke and odour nuisance arising from on-site burning of construction waste.	<ul style="list-style-type: none"> - There will be no burning of waste on site. All waste will be disposed at an approved location.
	2.6 Damage to any chance finds and protected sites. 2.7 Damage to cultural heritage.	<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. - Chance Find Procedures should be followed. - Training should be provided to all project workers on Chance Find Procedures.
	2.8 Initiation of instability arising from changes in natural slope geometry, with adverse implications for workforce safety during construction.	<ul style="list-style-type: none"> - The contractor will accept full responsibility for the adequacy, stability and safety of all operations and methods of construction, as well as have full regard for the safety of all persons entitled to be on the site and keep the site and works in an orderly state appropriate to avoidance of dangers. - All works will be carried out in accordance with the approved plans.

		<ul style="list-style-type: none"> - Construction will be carried out such as not to promote instability during construction. Excavated slopes will not exceed 2:1. - Excavation sides in excess of 1.5 m will be battered back or shored.
	2.9 Destruction of fauna and flora	<ul style="list-style-type: none"> - The preservation of rare plant species on the site. - The replanting of trees such as fat poke and calabash particularly along the cliff edge to help with soil stabilisation. - The clearing of invasive species on the site and ensuring that no new invasive species are introduced, and the use of indigenous species for tree enrichment. - No indiscriminate planting of ornamentals which do not blend well with the natural environment. - <u>The contractor will liaise with the Department of Forestry before undertaking any clearance of the site and will follow the guidelines set by the Department for clearing the site.</u>
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. - Adequate space and shelving to be provided to properly segregate chemicals. - Dry materials to always be placed above liquids, never vice versa.

		<ul style="list-style-type: none"> - 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 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 system. - 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.</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.
	<p>3.5 Impedance of access to/from lands adjacent to the worksite.</p>	<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

		<p>occupation of public roads, footpaths, properties and public beaches, or coastal waters.</p> <ul style="list-style-type: none"> - 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 especially along the Millennium Highway. - Contractor should erect appropriate (approved) signage along 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. - Contractor should consult Transport Board early for approval and advice if there is likely to be any traffic disruption.
	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, 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 avoid 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 or private land owner. 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 plants 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.

		- 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. 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 	The Contractor- assistance can be sought from NEMO as well as the DOI.

		<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> <p>14. Use caution when assessing damage because of potential post-storm hazards. A construction site will have numerous hazards after a hurricane</p>	
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		<p>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. 4. Buildings can topple in an earthquake. This includes buildings that are not yet complete, and some construction projects will be at 	<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, 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 	The Contractor- assistance can be sought from NEMO as well as the DOI.

	<p>higher risk because their earthquake protection measures may not be completed.</p>	<p>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> <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>	
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		12. Wear protective clothing during clean-up. Long sleeves, heavy boots, and work gloves can protect you from damage from sharp objects that were dislodged during the shaking.	
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. 	<ol style="list-style-type: none"> 1. Identify any risks based on the site location. If the site is near water, ascertain whether there is natural drainage, if not identify if there is a way to add drainage. Use flood maps to assess this risk, then take measures to ensure the area can properly drain when needed. 2. Understand the impact of sediment runoff. Often in construction, the contour of the land is important to the construction project. When sediment runoff occurs, defining property boundaries can become difficult. Also, the grading that has occurred to make the building project possible will be damaged. 3. Have a plan to protect equipment and personnel if the site floods. Creating a site flooding plan if the site is at risk for a flood will save lives and money. 4. Assess the materials that will be damaged by flood waters. Steel construction material may be fine if it gets wet. Plasterboard or composite wood will be damaged. If a flood is coming, elevate those materials that need to be kept dry. If a flood occurs without warning, dispose of damaged material before moving on with the project. 5. Build portable barriers to prevent flood damage. Gates or flood walls and even sandbags can all help reduce the risk of financial damage and loss from flooding at a construction site. 6. Store electrical and mechanical equipment above projected flood heights. If there is a flood warning, make sure electrical and mechanical equipment is stored above the flood water's expected level. 	

		<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 Operations Phase Mitigation

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

Key impacts and mitigation measures are:

- **Waste Management:**
Waste can be generated due to the vending activities which take place on the site as well as the anticipated increased in visitor activity. A garbage storage area is being constructed to assist in that regard, and this will be managed by the NCA with support from the St. Lucia Solid Waste Management Authority (SLSWMA).
- **Air and noise Pollution:**
Air and noise pollution can occur if the building is used for mass crowd activities and these will be managed by the NCA and the organiser of the activity following guidelines outlined in approvals from the Police and Fire Departments, and National Emergency Management Organisation.

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

12.0 COVID-19 GUIDELINES FOR CONSTRUCTION SITES

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

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

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

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

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

WHAT SHOULD THE CONTRACTOR COVER?

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

PIUs and contractors should refer to guidance issued by relevant authorities, both national (see National Guidelines below) and international (e.g. WHO), which is regularly updated. Addressing COVID-19 at a project site goes beyond occupational health and safety, and is a broader project issue which will require the involvement of different members of a project management team. In many cases, the most effective approach will be to establish procedures to address the issues, and then to ensure that these procedures are implemented systematically. Where appropriate given the project context, a designated team should be established to address COVID-19 issues, including PIU representatives, the Supervising Engineer, management (e.g., the project manager) of the contractor and sub-contractors, security, and medical and OHS professionals.

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

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

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

13.0 TRAINING IN ENVIRONMENTAL AND SOCIAL AWARENESS

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

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

14.0 GRIEVANCE REDRESS MECHANISM

Individuals and groups who may consider themselves deprived of appropriate treatment under the project will utilize the established grievance redress mechanism. The process includes: (i) a recording and reporting system, including grievances filed both verbally and in writing, (*A template of a Grievance log is in Appendix II*) (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 PIU 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 a clear, formal, and transparent internal grievance redress 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 PIU. The Supervising Engineering (SE) identifies the problem area, then in collaboration with other support staff or/ and consultants, 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.
- The Social Safeguards Officer will also refer GBV related grievances to the relevant government agencies which can provide the complainant with the necessary support.

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 PIU. The grievance notes should be signed and dated by the aggrieved person.

The Project Coordinator or the Social Safeguards Officer, of the PIU 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 PIU.
- If an agreement cannot be reached the aggrieved party or parties shall raise their concerns to the PIU, who shall refer the matter to the Attorney General within ten (10) business days. Should

grievances remain unresolved at this level, they can be referred to the Court of Law.

The steps undertaken should a grievance arise are as follows:

Grievance Redress Procedures

Grievances from affected parties	<p>Grievances made verbally to the Social Safeguards Officer (SSO) in person at stakeholder engagement meetings or to the Contractor’s personnel. All GBV complaints will be handled directly by the SSO.</p> <p>By email to the following address- ortcpslu@govt.lc</p> <p>By letter, addressed to the: Project Manager ORTCP</p> <p style="text-align: center;">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>
Access Point	<ul style="list-style-type: none"> • The PIU 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 PIU and technical officers from the pertinent Government authorities. • Letters acknowledging the grievance is issued by the PIU • The Social Transformation Officer (STO) for the region provides assistance with dealing with conflict resolution and grievance. The SSO will communicate all disputes and grievances to the PIU 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 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- ortcpslu@govt.lc

By letter, addressed to the: Project Manager

ORTCP

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

By phone at number 468 5816 / 468 4610 or call, text or WhatsApp to the SSO at 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"); in the case of GBV the claimant may choose to make an anonymous complaint.
- (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; In the case of GBV the claimant can refrain from providing details.
- (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.

Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

The specific nature of sexual exploitation and abuse and of sexual harassment (SEA/SH) requires tailored measures for the reporting, and safe and ethical handling of such allegations. A survivor-centered approach aims to ensure that anyone who has been the target of SEA/SH is treated with dignity, and that the person's rights, privacy, needs and wishes are respected and prioritized in any and all interactions.

The project's E&S Specialist will be responsible for dealing with any SEA/SH issues, should they arise. A list of SEA/SH service providers will be kept available by the project. The GM should assist SEA/SH survivors by referring them to Services Provider(s) for support immediately after receiving a complaint directly from a survivor. A list of service providers is included in Appendix II.

To address SEA/SH, the project will follow the guidance provided on the World Bank Technical Note "Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Civil Works". This GM will follow the official WB definitions described on the Technical Note as shown below:

Sexual Abuse (SEA) is an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions

Sexual Exploitation (SE) refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual harassment (SH)

Sexual Harassment (SH) is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) service provider

An organization offering specific services for SEA/SH survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

Survivor-centered approach

The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor’s interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor’s capacity to make decisions about possible interventions.

The E&S Specialist and PIU will receive sensitization training on the survivor-centred approach.

SEA/SH grievances can be received through any of the available channels and will be considered level 3 grievances investigated and addressed by the GRC. A list of SEA/SH service providers will be kept available by the Project. Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centered approach¹. Any cases of SEA/SH brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The WB will be notified as soon as the Project Manager and the E&S specialist learn about the complaint.

If a SEA/SH related incident occurs, it will be reported through the GM, as appropriate and keeping the survivor information confidential. Specifically, following steps will be taken once an incident occurs:

ACTION 1: COMPLAINT INTAKE AND REFERRAL

If the survivor gives consent, the E&S specialist fills in a complaints form excluding any information that can identify the survivor:

- The nature of the allegation (what the complainant says in her/his own words without direct questioning)
- If the alleged perpetrator was/is, to the survivor’s best knowledge, associated with the project (yes/no)
- The survivor’s age and/or sex (if disclosed); and,
- If the survivor was referred to services

If the survivor does not want to provide written consent, her consent can be verbally received. If needed or desired by the survivor, the PIU E&S Specialist refers her/him to relevant SEA/SH service providers, identified in the mapping of SEA/SH service providers and according to preestablished and confidential referral procedures. The survivor’s consent must be documented even if it is received verbally. The service providers will be able to direct survivors to other service providers in case the survivor wishes to access other services. The PIU safeguards specialist will keep the survivor informed about any actions taken by the perpetrator employer. If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the PIU Safeguards Specialist can close the case.

ACTION 2: INCIDENT REPORTING

¹ The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor centered approach aims to create a supportive environment in which the survivor’s interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor’s capacity to make decisions about possible interventions.

The PIU E&S Specialist needs to report the anonymized SEA/SH incident as soon as it becomes known, to the Project Manager who will in turn inform the World Bank Task Team Leader (TTL) or directly to the TTL.

Complaint Forms and other detailed information should be filed in a safe location by the PIU Safeguards Specialist. Neither the PIU E&S specialist nor the Project Manager should seek additional information from the survivor.

SEA/SH incident reporting is not subject to survivors' consent but the PIU E&S Specialist needs to provide ongoing feedback to the survivor at several points in time: (1) when the grievance is received; (2) when the case is reported to PIU and WB; (3) when the verification commences or when a determination is made that there is an insufficient basis to proceed; and (4) when the verification concludes or when any outcomes are achieved or disciplinary action taken.

As long as the SEA/SH remains open the PIU Safeguards Specialist and/or Project Manager should update the World Bank TTL on the measures taken to close the incident.

ACTION 3: GRIEVANCE VERIFICATION AND INVESTIGATION

Each SEA/SH incident should be verified to determine if it was related to the WB financed project. The PIU E&S specialist should form a SEA/SH verification committee comprised by her/him, one member of the PIU, one member of a local service provider and a representative of the contractor (if relevant). The PIU E&S Specialist should notify the SEA/SH Committee of the incident within 24 hours of its creation. The SEA/SH verification committee will consider the SEA/SH allegation to determine the likelihood that the grievance is related to the project.

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to a project², the verification committee discusses appropriate actions to be recommended to the appropriate party i.e., the employer of the perpetrator, which could be the PIU or a contractor. The PIU will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with local labour legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

For SEA/SH incidents where the survivor did not consent to an investigation, the appropriate steps should be taken to ensure the survivor is referred to/made aware of available services and that the project mitigation measures are reviewed to determine if they remain adequate and appropriate or if they require strengthening.

If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in the St. Lucian legal system, the PIU Safeguards Specialist should provide linkages to the relevant institutions. Ensuring due legal process is up to the police and the courts, not the SEA/SH verification committee. Unlike other types of issues, the PIU E&S Specialist does not conduct investigations, make any announcements, or judge the veracity of an allegation.

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

- Refer complainants to the SEA/SH Services Provider; and
- Record the resolution of the complaint

The GM will also immediately notify both the Implementing Agency and the World Bank of any SEA/SH complaints **WITH THE CONSENT OF THE SURVIVOR**.

² Project actors are: (a) people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers); (b) people employed or engaged through third parties (Project staff, subcontractors, brokers, agents or intermediaries) to perform work related to core functions of the project, regardless of location (contracted workers); (c) people employed or engaged by the Borrower's primary suppliers (primary supply workers); and (d) people employed or engaged in providing community labor such as voluntary services or participation in project activities and processes (community workers).

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.

15.0 APPENDICES

Appendix I – GRM Registration Form and Grievance Closure 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. (Use overleaf if necessary)

Note that For GBV related complaints ONLY the following should be recorded:

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.

(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 r

WhatsApp / Messenger

(Signature of aggrieved person) _____

Name of recording Officer: _____ (Signature) _____

(Please print)

List all documentation enclosed: (continue overleaf)



OECS Regional Tourism Competitiveness Project

REGISTRATION OF GBV RELATED GRIEVANCES

NOTE: The following survivor-centred principles must be at the forefront of all interactions with the complainant:

- (i) Timely access to quality, multi-sectoral services
- (ii) Confidentiality and informed consent
- (iii) Safety
- (iv) Non-discrimination
- (v) Respect and self-determination

Please use CAPITAL LETTERS

Note that the complainant has the right to remain anonymous and in that case ONLY the following should be recorded:

Name of Project Site: _____

Age of the Complainant: _____

Sex of the Complainant: _____

The nature of the complaint (what the complainant says in her/his own words without direct questioning).

To the best of your knowledge, was the perpetrator associated with the project? Yes _____ No _____

Have you been referred to Social Services Providers: Yes _____ No _____

If **NO**, do you wish to be referred to any Social Service Providers? Yes _____ No _____

If **YES**, which of the following do you need assistance with?

Psychosocial services Security, Housing and Shelter Legal Livelihood

Health

Do you consent to your complaint being reported? Yes _____ No _____

Inform the complainant that consent can be withdrawn at any time.

Date: _____ Time of Reporting: _____

dd/mm/yy



Grievance Closure Form

REGISTRATION NO.:

Subproject:

Location:

1. Name of Complainant:

2. Date of Complaint:

3. Summary of the Complaint:

4. Summary of Resolution:

5. Date of Redressal of the Grievance:

Signature of the Complainant in acceptance of the Solution to his /her Grievance

Name:.....

Signature..... Date

Signature of Permanent Secretary or Project Manager:

Name:.....

Signature:.....

Date:.....

dd –mm – yyyy

Appendix II - Grievance Log Template



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										

St. Lucia GBV Service Providers

Service Providers	Service Provided	Address	Telephone	Other
Attorney General	Case Management	2 nd Floor Francis Compton Building, Waterfront, Castries	468-3202	
Office of the Director of Public Prosecution	Case Management		452-3636 468-3185 468-3017	slucps@gmail.com
Family Court	Case Management	Peynier Street, Castries	468-3308	familycourt.slu@gmail.com
Criminal Investigations Department	Case Management	Castries Vieux Fort	456-3770 456-3817 456-3926	
Vulnerable Persons Unit	Case Management	Vulnerable Persons Team South	456-3908	

	Investigates sexual offences against minors, women and men.	North	456-4050 4051 4052	
St. Lucia Against Human Trafficking	Provides human trafficking victims and survivors with access to critical support and services to get help and stay safe.	Ministry of Home Affairs, Justice and National Security 1 st Floor Sir Stanislaus Bldg. Waterfront Castries	468-3754	police@antitraffickingslu.org
Department of Gender Affairs	Psychosocial Support Livelihood Support	Ground Floor Georgian Court Bldg. John Compton Highway, Castries	716-3123	gender.relations@govt.lc
Abuse Hotline	Psychosocial Support		202	
St. Lucia Crisis Centre	Psychological Support Livelihood Support	107 Chausse Road, Castries	453-1521 712-7574	stluciacrisis@gmail.com

	Assistance with basic needs such as food and shelter			
Women's Support Centre	Legal Aid Psychological Support Livelihood Support Assistance with basic needs such as food and shelter		458-4470	WSCCENTER2001@GMAIL.COM
Raise your Voice St. Lucia Inc	Psychological Support Livelihood Support	Manoel Street, Castries	726-0473 487-2329	raiseyourvoiceslu@gmail.com https://ryvslu.org/
Positive Reactions Over Secrets And Fears (PROSAF)	Psychological Support	PO Box 973 Castries	724-9991	info@prosaf.org https://prosaf.org
United and Strong	Assistance for LGBTI persons	P.O. BOX 772 Castries,	450-0976	unitedandstrongstlucia@yahoo.com www.facebook.com/Unitedandstrongstlucia/
St. Lucia Planned Parenthood Association	Sex education counselling	52 John Compton Highway	452-4335 Hotline:	slppa758@gmail.com

	Sexual and reproductive health services		459-7933 Whatsapp: 722-1234	
OKEU Hospital	Medical Health Services	Castries	458-6500	
St. Jude Hospital	Medical Health Services	Vieux Fort	454- 6041	
Soufriere Hospital	Medical Health Services	Soufriere	459-7258	
Canaries Health Centre	Medical Health Services	Canaries	459-4430	
Castries Health Centre	Medical Health Services	Chaussee Road Castries	452-4416	
Gros Islet Polyclinic	Medical Health Services	Gros Islet	450-9661	
La Fargue Health Centre	Medical Health Services	La Fargue, Choiseul	459-3238	
National Mental Wellness Centre	Psychological Support	Castries	458-2713 453-0069	

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



SAINT LUCIA SOLID WASTE MANAGEMENT AUTHORITY

GUIDELINES FOR THE SUBMISSION OF WASTE MANAGEMENT PLANS FOR DEVELOPMENTS

(Revised September 2013)

Purpose of the Guidelines

These guidelines are intended to:

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

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

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

1.0 Introduction

1.1 *Name of Proposed Project/Development.*

1.2 *Brief description of the Proposed Project/Development.*

2.0 Pre-Construction Phase

2.1 *Site Description*

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

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

2.2 *Waste Description & Quantities*

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

2.3 *Waste Diversion*

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

2.4 *Waste Transportation*

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

3.0 **Construction Phase**

3.1 *Waste Description & Quantities*

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

3.2 *Waste Storage*

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

3.3 *Waste Transportation*

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

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

3.4 *Waste Collection Frequency and Spill Control*

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

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

4.1 Operational Phase

4.1 Indicate the propose use(s) of the development upon completion.

4.2 Indicate the number, capacity and type of waste receptacles which will be provided on the premises and where they be placed for the storage of waste generated.

4.3 Indicate the frequency with which the waste will be disposed and at which landfill.

4.4 Indicate what measures will be taken in order to prevent access by vagrants and members of the public to the stored solid waste.

4.5 Indicate the manner in which the waste will be placed out on the road curb/sidewalk for collection and the frequency.

4.6 Indicate whether the building will be used for both residential and commercial purposes.

4.7 For commercial establishments, indicate who will be responsible for the disposal of the waste. In accordance with the Waste Management Act No. 8 of 2004, section 33 subsection 1, "Any person who conduct industrial, commercial or institutional operations must make their own arrangements for waste management and shall ensure that any waste generated does not present a risk to human health, safety or the environment".

Please note:

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

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

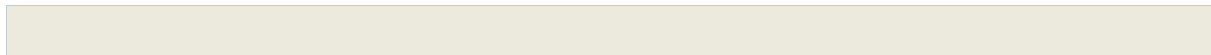
Appendix III – Environmental and Social Best Practices



Environmental and Social Best Practices Guidance

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 Anse Ferre Lookout Park construction 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. Chance Find Procedures
6. Safety statement
7. Emergency response plan
8. 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. 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 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 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 *Occupational Health and Safety (OHS) Guidance* for further information in Annex IV.

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 users during working hours must be safely provided for. This may require scheduling some aspects of the works on evenings, weekends and holidays.

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.

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.

The works will be conducted on a cape with the coastline below, and runoff during heavy rains may end up in 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 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
3. Poor placement of spoil material may have drainage, sedimentation, and dust issues associated.

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

1. 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.
2. 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 IV – Occupational Health and Safety (OHS) 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 the Anse Ferre Park and Lookout 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 (to be provided on a daily basis)**

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

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 number as per the COVID-19 requirement and the employer's instruction for additional resources.

NB: Any employee showing signs of flu-like symptoms will immediately be requested to leave the site and advised 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 include 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 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 aspects 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 projects 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

Method Of Performance

All aggregate and fill material required for testing will be collected by an appointed Quality Control Officer and taken to an approved laboratory for sample testing.

The QCO will inspect all material arriving on the site for incorporation into the construction works.

All specifications/test certificates for materials will be requested prior to delivery to site to ensure product conformity with the contract requirements.

The QCO will reject any material that is non-compliant with the acceptable submitted product specification/test certificates upon receiving on site, suppliers will be notified and project requirement reviewed with them. All suitable material will be properly stored to avoid contamination and defects prior to use.

All tests for concrete such as the slump test and compressive strength test will be done as received on site and will be sampled as in the case of the compressive test and sent to the laboratory for strength to be determined at the recommended days expressed in the contract specifications.

All materials will be handled in accordance with supplier's recommendation and good construction practice.

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, 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 samples will be 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 documented on an inspection form for the section of works inspected and signed off by the employer.

The document will reference any photos attached and filed in the project quality control folder.

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

Appendix V – Covid-19 National and International Health and Safety Guidelines

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

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

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

This includes but is not limited to:

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

13. Ensure systems are in place for consultation with workers on safety, health and welfare matters.
14. Encourage workers to report any safety and health concerns.

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

COVID-19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS

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

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

- (b) **ENTRY/EXIT TO THE WORK SITE AND CHECKS ON COMMENCEMENT OF WORK** Entry/exit to the work site should be controlled and documented for both workers and other parties, including support staff and suppliers.
 - Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.
 - Training security staff on the (enhanced) system that has been put in place for securing the site and controlling entry and exit, the behaviours required of them in enforcing such system and any COVID - 19 specific considerations.
 - Training staff who will be monitoring entry to the site, providing them with the resources they need to document entry of workers, conducting temperature checks and recording details of any worker that is denied entry.
 - Confirming that workers are fit for work before they enter the site or start work. While procedures should already be in place for this, special attention should be paid to workers with

underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.

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

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

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

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

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

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

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

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

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

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

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).

VI – Safeguards Quarterly Report Template



MINISTRY OF TOURISM, INVESTMENT, CREATIVE INDUSTRIES, CULTURE
AND INFORMATION

OECS REGIONAL TOURISM COMPETITIVENESS PROJECT
IDA Credit #6000-LC
Environmental and Social Safeguards Quarterly Report
[December 31, 2022]

A. Summary

An area along the Millennium Highway has grown in popularity as a lookout for tourists who stop to view a keyhole feature, also called Cinderella’s Slipper, in the cliff below. This area known as Anse Ferre is located in Ciceron in South Castries. The area has no infrastructure or amenities but this has not deterred tour guides and taxi drivers stopping along the highway to provide their guests with the opportunity to sightsee. Realizing the potential for economic activity in the area, young men from the Ciceron community have created self-employment opportunities entertaining tourists by jumping and diving off the cliff and are patronized by boating tourists as well as land-based tourist who stop along the highway. Although the area is very popular, the parking of vehicles along the busy highway is not encouraged as the highway is heavily trafficked and a sharp bend in close proximity to the site makes the location even more precarious. For this reason, the plan to develop the lookout and park has the safety of visitors as a main objective, while the amenities constructed will add value to the experience of the visitors as well as provide a space where residents of South Castries can participate in other economic activities such as food and craft vending to secure their livelihoods.

B. Sub-projects and Program Activities

C. Environmental Management Actions Items

The Screening Report was prepared and submitted to the Bank for review.

SUB-PROJECT Activity	STATUS	ADVANCES & CHALLENGES	NEXT STEPS
Anse Ferre Look out and Park	<ul style="list-style-type: none"> • Consultations held with the community, Department of Fisheries and Forestry, and other government and institutional stakeholders. - The Screening Report submitted to the Bank for review. 	Revision of the Screening Report.	<ul style="list-style-type: none"> • Resubmit Screening Report to the Bank for approval. • Prepare the ESMP and submit to the Bank for approval. • Continue consultations with potential PAPs and other stakeholders.

Site visit held with personnel from the Departments of Forestry and Fisheries

D. Status of the Grievance Redress Mechanism

The GRM has been developed and will be presented in the ESMP for approval. A Communication Plan to assist with promoting the RM will be developed.


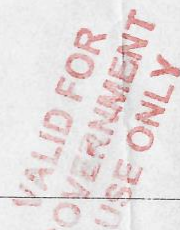
E. Context

The activity was stalled for an extended period, and reintroduced into the portfolio at the end of the year.

F. Conclusions and Recommendations

Preparation of the ESMP as well as the promotion of the GRM are the significant activities to be undertaken in the upcoming reporting period.

VII – Land Register for project site

Edition _____		Opened <u>16/10/2001</u>		A -- PROPERTY SECTION	
CROWN/ PRIVATE		APPURTENANCES		(12C)	
Nature of title: ABSOLUTE / PROVISIONAL		 		Registration	
Particulars recorded in para 6 of adjudication record (provisional title only)				Parcel No.	
Origin of title FIRST REGISTRATION <u>20/11/86</u>				Name of	
MUTATION NO. <u>281/2001</u>				Approx. a	
B -- PROPRIETORSHIP SECTION					
ENTRY NO.	DATE	INSTRUMENT NO.	NAME AND ADDRESS OF PROPRIETOR(S)		

PARCEL NO.

0646B 988

C - INCUMBRANCES SECTION

NATURE OF INCUMBRANCE	FURTHER PARTICULARS	SIGNATURE OF REGISTRAR

VALID FOR GOVERNMENT USE ONLY



REFERENCES

Antoine, L. C. A, (2020). *Environmental and Social Management Plan (ESMP) Castries Sidewalks Improvement Project.*

Government of St. Lucia, Ministry of Tourism, Information and Broadcasting, Culture and Creative Industries (2021). *Screening For Social and Environmental Impacts at The Gros Islet Waterfront.*

ORTCP (2016). *Environmental and Social Management Framework (ESMF) for OECS Competitiveness Project.*

Saint Lucia Project Coordination Unit (2017). *Project Implementation Manual OECS Regional Tourism Competitiveness Project*