

REGIONAL

Eastern Caribbean Central Bank

**CARIBBEAN DIGITAL
TRANSFORMATION PROGRAM
(CARDTP)**

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

March 31, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Eastern Caribbean Central Bank (ECCB) will implement the Caribbean Digital Transformation Program (the **Project**). The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. The ECCB will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The ECCB will also comply with the provisions of any other Environmental and Social (E&S) documents required under the ESSs and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and the timelines specified in those E&S documents.
4. The ECCB is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the ECCB as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the ECCB, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the ECCB will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the ECCB. The ECCB will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the ECCB shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Submitted to the Association semiannually during the implementation of the Project.</p> <p>The first report must be presented 6 months after the Project's Effective Date.</p>	ECCB
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including inappropriate disposal of hazardous wastes, construction accidents that result in death, serious or multiple injury, events of acute pollution due to air or noise emissions. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association of any incident or accident within 48 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within the timeframe established by the Association following the initial notification.</p>	ECCB
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish an organizational structure within the Project Implementation Unit (PIU) housed in the "Projects and Technical Assistance Unit, Governor's Immediate Office (GOI)" of the ECCB with qualified staff to support the management of ESHS risks of the Project. This will include, as a minimum (to be evaluated and adjusted during Project implementation, in consultation with the Association: An environmental and social specialist with qualifications and experience acceptable to the Association. Other specialists as Project Manager, Grants Manager, Procurement Specialist will also be part of the PIU.</p>	<p>The environmental and social specialist will be contracted or appointed no later than 30 days after the Project Effective Date.</p> <p>It must be maintained throughout the implementation of the Project.</p>	ECCB

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	ENVIRONMENTAL AND SOCIAL ASSESSMENT Finalize, adopt, disclose and implement an Environmental and Social Management Framework (ESMF), which shall include an Environmental and Social Assessment (ESA) for the Project, as appropriate, in a manner acceptable to the Association.	The ESMF/ESA shall be adopted and disclosed, in a manner acceptable to the Association no later than 30 days after the Project Effective Date. The ESMF will be implemented throughout Project implementation.	ECCB
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Update, adopt, and implement the Labor Management Procedures (LMP) including, inter alia, occupational, health and safety (OHS) measures that have been developed for the Project, in a manner acceptable to the Association.	The LMP shall be adopted, in a manner acceptable to the Association, no later than 30 days after the Project Effective Date. The LMP will be implemented throughout Project implementation.	ECCB
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation.	ECCB
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN: Prepare, adopt, and implement a Waste Management Plan as part of the ESMF for the Project, which shall include measures to, inter alia, manage hazardous and non-hazardous wastes and e-wastes.	Same timeframes as for the preparation and implementation of the ESMF, under action 1.2.	ECCB
ESS 4: COMMUNITY HEALTH AND SAFETY			
Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to assess and manage specific risks and impacts to the community, and traffic and road safety risks.			
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
ESS 5 is currently not relevant			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to ensure that activities do not take place on or adversely impact biodiversity and environmentally sensitive areas, particularly natural or critical habitats.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
ESS 7 is currently not relevant			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 8: CULTURAL HERITAGE			
Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to implement chance find procedures.			
ESS 9: FINANCIAL INTERMEDIARIES ESS 9 is currently not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: Prepare, disclose, consult, update, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, as appropriate, in a manner acceptable to the Association.</p>	<p>The draft SEP shall be consulted, updated, adopted and disclosed, in a manner acceptable to the Association, no later than 30 days after the Project Effective Date. The SEP will be implemented throughout Project implementation.</p>	ECCB
10.2	<p>PROJECT GRIEVANCE MECHANISM: 1. Establish, maintain and operate a grievance mechanism, as described in the SEP. 2. Provide quarterly reports to the Association on the functioning of the GRM.</p>	<p>1. Same timeframe than action 10.1. Maintained and operated throughout Project implementation. 2. Submit to the Association quarterly monitoring reports throughout Project implementation. The first report should be submitted 3 months after the Project Effective Date.</p>	ECCB
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training to be provided for PIU staff and key stakeholders on:</p> <ul style="list-style-type: none"> • Environmental and Social Standards (ESS 1-10) • Environmental, Health and Safety Guidelines • Stakeholder Engagement Plan • Grievance Redress Mechanism 	<p>On commencement of PIU staff, especially, Project Manager, Grants Manager, Procurement Specialist, and Environment and Social Specialists.</p>	ECCB

SAINT VINCENT AND THE GRENADINES

CARIBBEAN DIGITAL TRANSFORMATION PROGRAM (CARDTP)

Draft ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

March 26, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Saint Vincent and the Grenadines will implement the Caribbean Digital Transformation Program (the **Project**), with the involvement of the Ministry of Finance, Economic Planning, Sustainable Development and Information Technology (MoFEPSDIT). The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. Saint Vincent and the Grenadines will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. Saint Vincent and the Grenadines will also comply with the provisions of any other E&S documents required under the ESSs and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Environmental and Social Management Plans (ESMPs), Resettlement Policy Framework (RPF), Resettlement Action Plans (RAPs), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and the timelines specified in those E&S documents.
4. Saint Vincent and the Grenadines is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by Saint Vincent and the Grenadines as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and Saint Vincent and the Grenadines, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, Saint Vincent and the Grenadines, through the Minister responsible for the MoFEPSDIT, will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the minister responsible for MoFEPSDIT. MoFEPSDIT will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, Saint Vincent and the Grenadines shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Submitted to the Association semiannually during the implementation of the Project.</p> <p>The first report must be presented 6 months after the Project's Effective Date.</p>	MoFEPSDIT
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, including inappropriate disposal of hazardous wastes, construction accidents that result in death, serious or multiple injury, events of acute pollution due to air or noise emissions. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Association of any incident or accident within 48 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within the timeframe established by the Association following the initial notification.</p>	MoFEPSDIT
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>MoFEPSDIT will require contractors, including any supervising entities and consultants, to provide monthly reports on environmental, social, health and safety aspects to MoFEPSDIT. Such monthly reports shall be submitted by MoFEPSDIT to the Association, upon request.</p>	<p>At the request of the Association.</p>	MoFEPSDIT
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish an organizational structure within MoFEPSDIT with qualified staff to support the management of ESHS risks of the Project. This will include, as a minimum (to be evaluated and adjusted during the Project implementation, in consultation with the Association): An environmental and social specialist with qualifications and experience acceptable to the Association.</p>	<p>The environmental and social specialist will be contracted or appointed, no later than 30 days after the Project Effective Date. It must be maintained throughout the implementation of the Project</p>	MoFEPSDIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT Finalize, adopt, disclose and implement an Environmental and Social Framework (ESMF) which shall include an Environmental and Social Assessment (ESA) for the Project, as appropriate, in a manner acceptable to the Association.</p>	<p>The ESMF shall be finalized, adopted and disclosed, in a manner acceptable to the Association no later than 30 days after the Project Effective Date.</p> <p>The ESMF will be implemented throughout Project implementation.</p>	MoFEPSDIT
1.3	<p>ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS Screen any proposed subproject and other Project activities in accordance with the ESMF prepared for the Project, and, thereafter, prepare, adopt, disclose and implement any Environmental and Social Management Plans (ESMP), as required, in a manner acceptable to the Association.</p> <p>Any activities that would fall within the exclusion/ineligibility criteria of the ESMF shall not be supported.</p>	<p>The ESMPs will be prepared and submitted for the Association’s review and approval, and thereafter adopted and disclosed prior to launching the procurement process for the respective civil works and will be implemented throughout the execution of said works. The ESMPs will be included in the contracts.</p> <p>The ESMPs will be implemented throughout the execution of the respective works.</p>	MoFEPSDIT
1.4	<p>MANAGEMENT OF CONTRACTORS Ensure that all contractors have the necessary capacity to comply with the corresponding ESMPs and the Project’s Labor Management Procedures throughout their contract. This includes:</p> <ul style="list-style-type: none"> Ensuring that the procurement documents include the necessary technical specifications for the adequate handling of issues contained in the ESMPs and Labor Management Procedures. Ensuring that contractors have the necessary staff and capacity during the execution of the works to comply with said instruments. 	<p>During the term of all contractual activities of the Project, including:</p> <ul style="list-style-type: none"> Prior to the preparation of procurement documents. Before mobilization of each contractor, and maintained throughout the construction period. 	MoFEPSDIT
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p>LABOR MANAGEMENT PROCEDURES Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project, in a manner acceptable to the Association.</p>	<p>The LMP shall be adopted, in a manner acceptable to the Association, no later than 30 days after the Project Effective Date.</p> <p>The LMP will be implemented throughout Project implementation.</p>	MoFEPSDIT
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation.	MoFEPSDIT
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Prepare, adopt, and implement occupational, health and safety (OHS) measures including measures on emergency preparedness and response, as part of the development and implementation of project activities and the ESMPs, in accordance with the guidelines contained in the ESMF and LMP.</p>	Same timeframe as action 1.3 above.	MoFEPSDIT
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN: Prepare, adopt, and implement a Waste Management Plan as part of the ESMF for the Project, which shall include measures to, inter alia, manage hazardous and non-hazardous wastes and e-wastes. These measures will be part of the ESMP to be prepared in accordance with the ESMF.</p>	Same timeframes as action 1.3 above.	MoFEPSDIT
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures will be covered under the ESMPs as necessary.</p>	Same timeframe as action 1.3 above.	MoFEPSDIT
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed accordance with the guidelines contained in the ESMF.</p>	Same timeframe as action 1.3 above.	MoFEPSDIT

4.2	<p>COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, including, site preparation, construction and rehabilitation, and include these measures in the ESMPs.</p>	Same timeframe as action 1.3 above.	MoFEPSDIT
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT PLANS: 1. Prepare, consult, disclose, adopt and implement a Resettlement Policy Framework consistent with ESS5, in a manner acceptable to the Association. 2. Prepare, consult, disclose, adopt and implement resettlement plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF), and thereafter adopt and implement the respective RAPs before carrying out the associated activities, in a manner acceptable to the Association.</p>	<p>1. RPF shall be finalized, adopted and disclosed, in a manner acceptable to the Association no later than 30 days after the Project Effective Date. 2. RAPs shall be submitted for the Association's approval and, once approved, shall be implemented prior to commencing of Project activities that involve land acquisition and resettlement.</p>	MoFEPSDIT
5.2	<p>GRIEVANCE MECHANISM: Prepare, adopt, and implement the arrangements for the grievance mechanism to address resettlement related complaints as described in the RPF, RAP and SEP.</p>	Same time frame than action 5.1 above.	MoFEPSDIT
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS: Develop and implement procedures to ensure that civil works financed by the Project do not take place on or adversely impact biodiversity and environmentally sensitive areas, particularly in natural or critical habitats. These procedures will be part of the ESMPs to be prepared in accordance with the ESMF.</p>	Same timeframe as action 1.3 above.	MoFEPSDIT
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES ESS7 is not currently relevant			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS: Prepare, adopt and implement the chance finds procedure described in the ESMF to be prepared in accordance with the ESMF.</p>	Same timeframe as action 1.3 above.	MoFEPSDIT

ESS 9: FINANCIAL INTERMEDIARIES			
ESS 9 is currently not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: Prepare, disclose, consult, update, adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, as appropriate, in a manner acceptable to the Association.	The draft SEP shall be consulted, updated, adopted and disclosed, in a manner acceptable to the Association, no later than 30 days after the Project Effective Date. The SEP will be implemented throughout Project implementation.	MoFEPSDIT
10.2	PROJECT GRIEVANCE MECHANISM: 1. Establish, maintain and operate a grievance mechanism, as described in the SEP. 2. Provide quarterly reports to the Association on the functioning of the GRM.	1. Same timeframe than action 10.1. Maintained and implemented throughout Project implementation. 2. Submit to the Association quarterly monitoring reports throughout Project implementation. The first report should be submitted 3 months after the Project Effective.	MoFEPSDIT
CAPACITY SUPPORT (TRAINING)			
CS1	Training to be provided for PIU staff and key stakeholders on: <ul style="list-style-type: none"> • Environmental and Social Standards (ESS 1-10) • Environmental, Health and Safety Guidelines • Stakeholder Engagement Plan • Grievance Redress Mechanism 	Training for direct Project workers will be conducted before the start of works. Training will thereafter continue throughout Project implementation. Training of PIU staff will be conducted within 60 days of action 1.1.	MoFEPSDIT
CS2	Training for Project contractors/workers on E-waste, occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.]	Prior to the start of works.	MoFEPSDIT