

# Emergency Agricultural Livelihoods and Climate Resilience Program

## Environmental and Social Management Plan (ESMP)

### Rehabilitation of D`Leau Gommier Forest Station

#### Subcomponent B.1: Restoration of Key Infrastructure Forestry

June 8<sup>th</sup>, 2022

Remnants of D`leau Gommier Forest Station



Top floor of Forest Station

Interior of Forest Station



## Revision Record

<b>Revision</b>	<b>Date</b>	<b>Author(s)</b>	<b>Remarks</b>
1.	May 26, 2022	EALCRP PIU & IST Safeguards	Preliminary Draft
2.	July 27, 2022	World Bank	Preliminary Draft Review
3.	August 4, 2022	PIU & IST review	Draft Reviewed
4.			Draft – Disclosure and Consultation

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# Chapter 1. Introduction and Background

## 1.1 EALCRP Project Overview and Objectives

After the passage of Hurricane Maria in September 18, 2017, The Government of the Commonwealth of Dominica (GoCD) with funding from the World Bank Group commenced ~~with~~ implementing the Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP). The objectives of the Project are to contribute to restoring agricultural livelihoods and enhancing climate resilience of farmers and fisher folks affected by Hurricane Maria in Dominica.

Under component B, the project is design to deliver a series of infrastructure projects to the Division of Agriculture in the Ministry of Blue and Green Economy, Agriculture and National food Security. The Forestry, Wildlife and National Parks Division was also targeted to receive three upgraded field offices, referred to as Forest Stations.

This Subcomponent B.1 will help in the process of restoring forest stations and associated forest extension services that severely impacted as a result of the passage of Hurricane Maria in September 2017. These facilities are located at Delices in South East, Calibishie in the Northeast and D'leau Gommier in the Central Forest Reserve.

## 1.2 ESMF and ESMP for the Project

The established Environmental and Social Management Framework (ESMF)<sup>1</sup> for the project requires all project related activities, including sub-project activities to be reviewed and assessed to ensure that environmental and social impacts associated with their implementation throughout the project's life cycle are avoided, mitigated, or compensated. The Environmental and Social Management Plan (ESMP) is one of the safeguards instruments used to address the environmental and social impacts and risks of projects, and as a result this ESMP has been prepared.

This ESMP describes the status and details of the project, due-diligence of the works accomplished to date, and the evidence and certification that the facility has and will continue to be undertaken in compliance with applicable World Bank safeguards requirements and laws of Dominica. Based on the screening conducted for this project (see Annex 1), an Environmental and Social Management Plan (ESMP) is required to identify and appropriately manage environmental, social, health and safety impacts and risks.

This ESMP has been prepared to provide guidance and mitigation measures to the implementing entities (Local Government Authorities, and contractors/sub-contractors) to ensure that the Renovation of the D'leau Gommier Forest Station is compliant with national and regional environmental regulations, and consistent with international best practices and World Bank safeguards policies, and the ESMF created for the project.

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<sup>1</sup> <http://www.piu.agriculture.gov.dm/publications/45-environmental-and-social-management-framework-esmf>

Specifically, it will ensure the protection of workers and Staff of the Ministry of Blue and Green Economy, Agriculture and National Food Security; the Forestry Division, Ministry of the Environment, Rural Modernization and Kalinago Upliftment and Contractors from environmental and social impacts and risks associated with the renovation activities, such as fugitive dust, waste management, health and safety, and providing timely and clear public information on the project.

This ESMP will be disclosed on the EALCRP website after World Bank's approval, and the records of the disclosure will be documented and recorded. This ESMP for the renovation of the D`leau Gommier Forest Station can be accessed at EALCRP website <http://www.piu.agriculture.gov.dm/>.

### 1.3 Functions of the Forest Stations

The Forestry, Wildlife and National Parks Division is the government agency charged with the day to day responsibility for managing the country's system of Forests. To do that, four administrative systems have been created. These are referred to as Forest Ranges: the Northern Forest Reserve, the Roseau or Southern Forest Range, the La Plaine or Eastern Forest range and the Central Forest Range.

Personnel at each of these administrative divisions include a Forester I, who is the Officer in charge and who is ably assisted by a Forester II and other temporary staff as required for specific work programs or projects.

The Forestry Staff at each of these facilities is responsible for ensuring that the forest estate is protected and guarded against illegal human activities. To do that they patrol the forests, support the conduct of research activities, manage the process for timber sales (e.g. timber cutting licences, and permits for the removal of forest produce), undertake various wildlife protection programs such as issuing hunting and fishing licences or for keeping wildlife in captivity; undertake forestry extension services such as visits to schools and other institutions for environmental awareness purposes and generally carry out the directives of the Director of Forestry that would ensure the sustainable utilization of the country's forest and wildlife resources.

The D`leau Gommier forest station has been the hub for all forest management related activities for the 4.1 square kilometres Central Forest Reserve from the inception of the Forest service in Dominica in 1949. The Forester and his subordinate staff are assigned to work in the range and function out of the D`leau Gommier Station. The staff may also be reassigned from various other areas of Dominica. Presently, the staff compliment comprises of one Forester I and two Forester II together with two (2) temporary staff.

## Chapter 2. Project Description

### 2.1 Location and Regional Setting

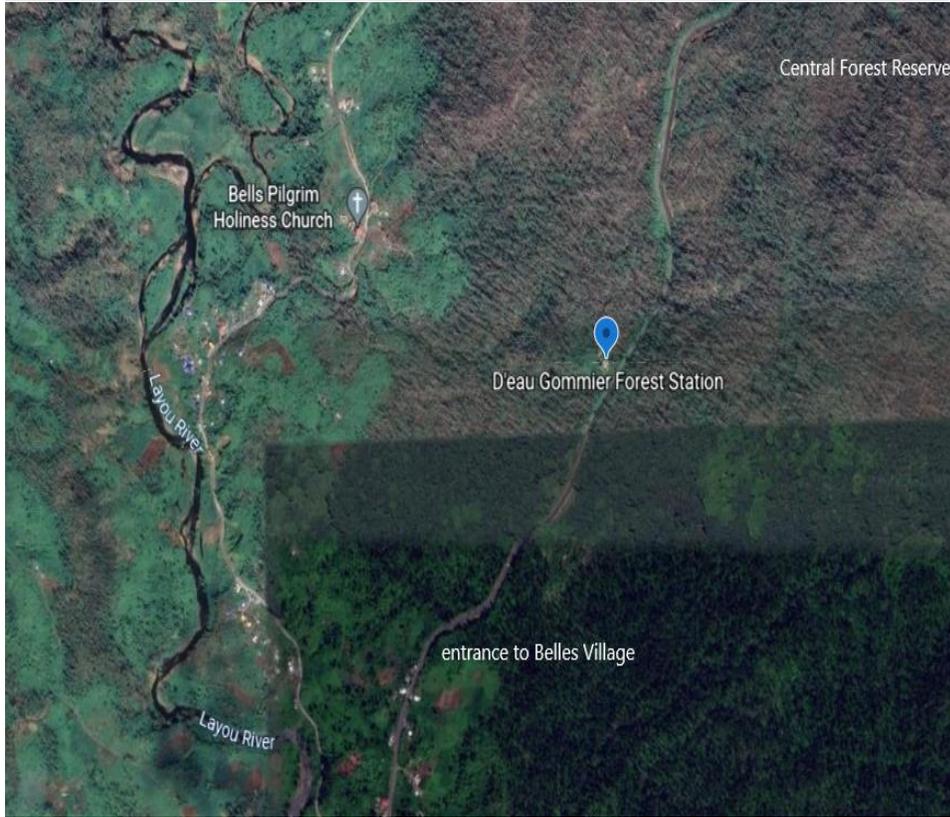
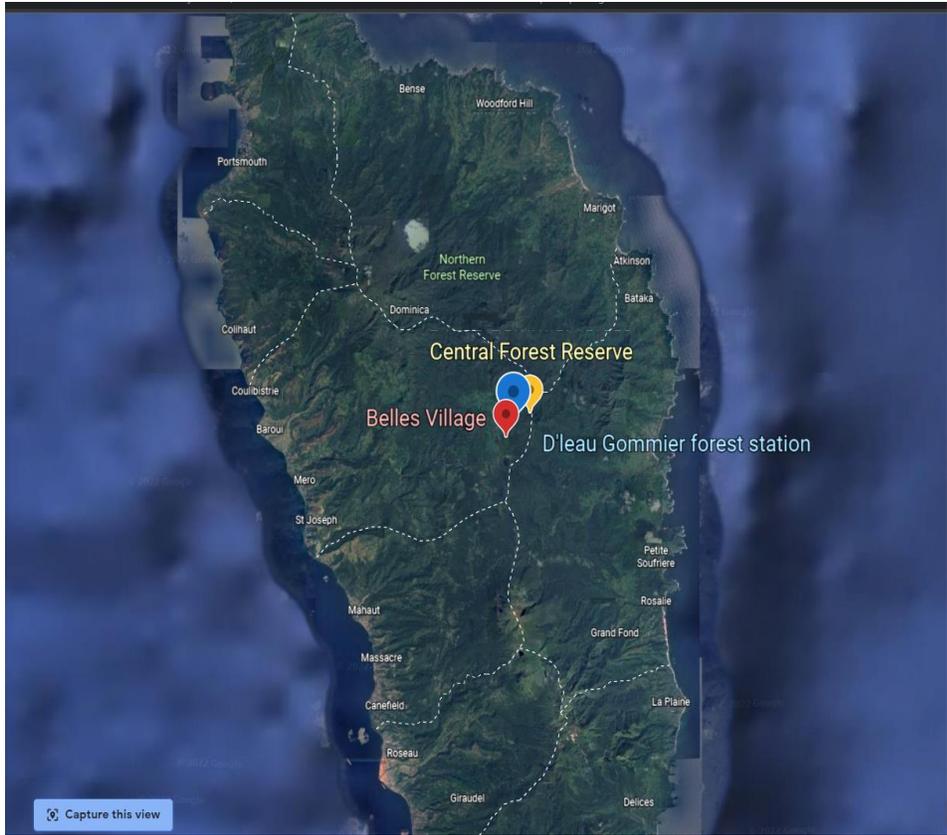
The D'leau Gommier Forest Station is located in the central heartland of Dominica on the southernmost approach to the Central Forest Reserve. The Central Forest Reserve is one of two forest reserves on the island, the second being the Northern Forest Reserve. All these lands are assigned to the Forestry, Wildlife and National Parks Division. The Central Forest Reserves comprises of an area of 4.1 square km. It is bordered on the western and southern flanks by a number of private lands whilst the east and north boundaries are confined by other State-owned lands. The bridge which spans two branches of the Pagau River (referred to locally as Deaux Branche) is the northern boundary to the Central Forest Reserve.

Photo #1. Entrance to station from highway



Photo # 2. Road to forest station





## 2.2 Project Details and Status

### 2.2.1 Proposed Plan for Forest Station

The D`leau Gommier Forest Station was completely destroyed by Hurricane Maria. What remains of the structure are the old foundation pillars and the badly damaged wooden components of the wall. These are strewn all over the place and are in advanced stages of decomposition as termites have rendered them useless. What is left at the site will be demolished, the site will be cleared and a new structure erected. The old forest station was approximately 2000 square feet with two floors. This station was equipped with washroom facilities, kitchenette, two offices and sleeping quarters, most of which will be incorporated into the new design. The old forest station also had a lumber yard which will not be a part of this project and as such will not be incorporated into the designs. There was also a small nursery that served to propagate forestry plants for the extension services of the Division, not only to serve the immediate vicinity but other areas Island-wide.

In October 2019, the Pond Case Forest Station, was completed with accommodation for camping, office space resident area for Forest Officers and a nursery. The D`leau Gommier Forest station will now serve as a small satellite propagation station supporting the work of the Pond Case nursery.

The D`leau Gommier facility is intended to serve as a centre for environmental learning where schools and other learning institutions from both the local and wider community can be accommodated with programs to learn about the environment. Farmers from the immediate communities can also be accommodated to learn new skills soil conservation, wildlife/human interface, forest hydrology, resilience cropping systems etc. all part of the Forestry Division's Extension work and natural resources management program

The new proposed building will be designed to include the following amenities:

- Reconstruction of the building (split level) with amenities for accommodating the resident staff.
- Provision for a small meeting room that can also double up for overnight camping purposes when there are larger numbers of people visiting.
- A kitchenette equipped with stove, fridge, sink and other facilities in the preparation of meals for Forest Officers.
- Two Offices for residing Forest Officers.
- Installation of solar panel for the provision of solar energy in the absence of electric power
- Installation of at least 1000 gallons cistern (underground) or water tank (1000 gallons (above ground) for water storage

### 2.2.2 Infrastructural Services

The nearest communities are Belles and D'leau Gommier, two farming communities with less than 1,000 individuals combined. The proposed D'leau Gommier Forest Station is not located within these villages and is challenged with the lack of potable water, electricity and internet services from the national grid. A small stream located just east of the site provided sufficient volumes of water for the station in its former existence. There is need to improve on the provision of water to the facility. Therefore, alternative means of supplying these amenities has to be sorted that can be used for both the construction phase and operation phase. Both utilities (water and electricity) are within close proximity, within a short distance of 1.5 miles from the site of the proposed forest station. Where the services are not available, then alternative means must be found. The design of this forest station must cater for the harvesting rain water. Such designs for the collection of rain water must have sufficient water pressure for effective plumbing services throughout the entire building. Through on- site screening, two sources of spring water were observed; one which is below the construction site from which water will have to be pump and stored. (see photo #3). However, consultations with villagers indicated that this spring water source is being used for drinking by the wider community and as such will not be used for supplying the forest station in its current state unless it is seriously upgraded.

Photo # 3. Water source downstream forest station



Photo #4. Water source upstream forest station



The other water source which is at a higher elevation from the proposed construction served as the source of water for the facility pre-Hurricane maria. The system comprised of collection point in the river (a small damn) that was piped directly to the forest station at one time. That set up was completely washed away by the flood waters of the Hurricane and there was no indication that any effort went into restoring this water source. It would therefore, be an advantage in restoring this system because firstly, it will be dammed and gravity fed as no energy for pumping is required and secondly, will not interfere with the potable water used by the villagers.

There is however some concern about its volumes during the dry season. A cursory observation of the natural conditions indicates that there is likely to be some fluctuations in the volumes. It is therefore proposed that this anticipated variations in volumes can be augmented with the establishment of a water tank or cistern (1,000 gallons) so as to have a constant water supply in times of low volume especially in the dry season. The construction of cisterns for the storage of water must also be incorporated into the designs of this forest station.

Electricity services are also not available at this forest station through the national grid (Dominica Electricity Services of Dominica - DOMLEC). Therefore, a generator has to be used to provide electric power during the construction phase until permanent electric connection is made.

Solar power is also an alternative form of natural energy and must be afforded that opportunity especially in light of the increase rise in fuel (diesel). In this regard, provisions in the electrical designs must cater for solar energy and has to be incorporated into the general design of the forest station. Further studies of solar energy at this site will be conducted before this form of energy is to be adopted.

In the theme building better and stronger as part of Dominica drive towards being the first Climate Resilience country in the world, it is strongly encouraged that government buildings constructed post Hurricane Maria should be used as hurricane shelters in time of natural disasters. This forest station can be used as shelter for the communities of Belles and D`leau Gommier.

## Chapter 3. The Legal and Administrative Framework

The ESMP was prepared against the background of ensuring the potential ESHS impacts and risks from the proposed D`leau Gommier Forest Station renovation activities are managed, mitigated and the subproject is compliant with the relevant laws of Dominica and the World Bank Environmental and Social Safeguards and Environmental, Health and Safety Guidelines. A comprehensive review of the policy, regulatory and legal framework in Dominica is described within the general ESMF<sup>2</sup> for the Emergency Agricultural Livelihoods and Climate Resilience. This ESMP attempts to address the most significant environmental and social impacts and risks associated with the proposed D`leau Gommier Forest Station construction activities, such as covid-19 guidelines, waste management, integrated pesticide management, physical planning, etc.

### 3.1 Relevant National Laws and Policies for the project

#### 3.1.1 Ministry of Health COVID 19 Guidelines

Since the outbreak and spread of COVID-19, people have been mandated by national policies and regulations to exercise social distancing and to avoid public gatherings to prevent and reduce the risk of the virus transmission. Countries have taken various restrictive measures, some imposing strict restrictions on public gatherings, meetings and people's movement, and others advising against public group events. At the same time, the general public has become increasingly aware and concerned about the risks of transmission, particularly through social interactions at large gatherings. The major risk of the COVID-19 is its mode of transmission and that an increase in physical contact as well as shared social spaces, enables the spread of the coronavirus. It is important that the established COVID protocols of the World Health Organization (WHO) and the Ministry of Health, Wellness and New Health Investment be applied to Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP) activities, PIU personnel, Forestry Staff, Beneficiaries and contractors.

#### 3.1.2 Physical Planning Act (2002)

The Physical Planning Act (2002) provides for the orderly and progressive development of land and for the granting of permission to develop land and for other powers of control over the use of land. This Act details the application and approval process which is executed through the Physical Planning Division of the Physical Planning and Development Authority. The Act states that 'No person shall carry out any development of land except under and in accordance with the terms of a development permission granted in that behalf prior to the commencement of such development. It makes provision for the Authority to consult with local authorities where such consultation is desirable in the interests of good planning. Since the location was already utilized for the similar purpose as now proposed, there is no requirement for spatial planning permission.

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<sup>2</sup> <http://www.piu.agriculture.gov.dm/publications/45-environmental-and-social-management-framework-esmf>

However, in terms of the resilience of the structure, the Physical Planning Division will be required to approve the proposed structural plans to ensure compliance with prevailing building codes.

### 3.1.3 Environmental Health Services Act (1997)

This act is mandated by the Environmental Health Department and makes provision for the conservation and maintenance of the environment in the interest of health generally and in relation to places frequented by the public. The Physical Planning Division works in close collaboration with in the Environmental Health Department in the inspection and certification of buildings for the installation / construction of for proper sewage disposal systems prior to construction.

### 3.1.4 Forestry and Wildlife Act (1990)

This Act provides for the protection, conservation and management of wild mammals, fresh water fishes and amphibians, crustaceans and reptiles, and for the purpose connected therewith. Forest reserve means any area declared by the President by Notice in the Gazette to be a forest reserve.

### 3.1.5 Forest Act (1990)

This Act make provision for the conservation and control of forest. This is critical especially where forest land (reserves) is bordering with agricultural lands and important watersheds / catchments areas.

### 3.1.6 Water and Sewage Act (1989)

This Act to make provision for a national policy for water, for the granting of an exclusive licence to the Dominica Water and Sewerage Company Limited (DOWASCO) for the development and control of water supply and sewerage facilities in Dominica and for connected or incidental purposes. Whilst the Dominica Water and Sewerage Company Limited is responsible for the production (collecting from our rivers and treatment) and distribution of water island-wide, it has no responsibility in law for the protection of watersheds. That responsibility by statutes, is vested firmly with the Forestry, Wildlife and National Parks Division

### 3.1.6 National Parks and Protected Areas Act (1990)

This Act respects the national parks and protected areas. National Parks are all lands set apart as protected areas and shall constitute the national parks system and are hereby vested in the State and dedicated to the people of Dominica for their benefit, education and enjoyment. Notwithstanding any other Act, the lands within the national park system shall be maintained and made use of so as to leave them unimpaired for the enjoyment of future generations.

### 3.1.7 Solid Waste Management Act 2002

Solid Waste Management Act (2002) is mandated by the Dominica Solid Waste Management Corporation (DSWMC). It sets out requirements for Waste Management licenses and permits. It prohibits the importation of waste and establishes liability and ownership of waste. It outlines requirements for the handling of waste, and provides for the management of used oil. It also addresses derelict motor vehicles, white goods and other scrap metal. The DSWMC is the authority responsible for the management of the landfill, where the majority of the projects waste will be disposed. The functions of the DSWMC are: (a) provided storage facilities for solid waste; (b) procure equipment for the collection, transportation and disposal of solid waste; (c) oversee the management of all solid waste collection and disposal systems in the State.

### 3.1.8 Pesticides Control Act (Cap. 40:10)

The Pesticides Control Act provides for the control of the importation, sale, storage and the use of pesticides. It creates a Pesticides Control Board to advise the Minister and to carry out provisions of the Act and its Regulations. It gives power of entry to an inspector. The Minister may make regulations to affect the provisions of the act. Subsidiary legislation includes the Pesticides Control (Labelling of Pesticides) Regulations and the Pesticides Control (Registration and Licensing) Regulations. This Act is relevant as the rehabilitation of the D`leau Gommier Forest Station will be treated for the prevention of termites' infestation.

## 3.2 World Bank Social and Environmental Safeguards

### 3.2.1 Safeguard Policies

The World Bank (WB) has developed Safeguard Policies that guide the development of projects including the EALCRP. Accordingly, the ESMF was prepared for the EALCRP as a guidance document, and currently the ESMP has been prepared for this project. World Bank Safeguards triggered by rehabilitation/construction cover aspects such as assessment and management of environmental and social risks and impacts, occupational health and safety, pollution prevention and management, public disclosure, natural habitat, and antiquities protection, among others. For a thorough discussion of these, please refer to the ESMF document (<http://piu.agriculture.gov.dm/publications>) or the WB website (<https://www.worldbank.org/en/projects-operations/environmental-and-social-policies>).

### 3.2.2 EHS Guidelines

Environmental, Health and Safety guidelines have also been prepared by the WB. There are general guidelines that cover most activities related to construction projects involving the renovation of existing buildings or construction of new facilities. Some parts of these general guidelines are applicable to the project, particularly such aspects as dust and noise control and workers' health and safety. For more information refer to the EHS Guidelines on the WB website.<sup>3</sup>

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<sup>3</sup>[https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/policies-standards/ehs-guidelines](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines)

## Chapter 4. Potential Environmental and Social Impacts

The proposed construction of the D`leau Gommier Forest Station is expected to generate positive benefits such as increasing available office for the Forest Officers/Guard, provide accommodation for staff or individuals conducting researcher in the area, improved working environment and can serve as a sub-regional hurricane shelter in times of disaster.

Notwithstanding the numerous positive benefits expected to accrue from the construction of the D`leau Gommier Forest Station, the following negative environmental and social impacts have been identified with the construction works. Mitigation measures for each of the impacts and risks identified below are presented in Chapter 5.

Prior to the commencement of site preparation, there is a need for contractor to adopt COVID 19 measures to reduce health risks to construction workers. The Government of Dominica's COVID procedures require contractors to protect their operations and workers to reduce the risk of spread of the COVID 19. As a result, the EALCRP PIU will require the contractor to prepare and submit a detailed COVID19 Plan demonstrating their ability to safeguard health and safety of workers/employees while on site in compliance with the GoCD and consistent with the WB guidelines on COVID-19 precaution measures for the construction sector (**See Annexes 2 and 3**). The COVID 19 Plan will be provided to all employees working on site.

### 4.1 Demolition Phase

Demolition of the D`leau Gommier forest station will comprise of heterogeneous waste and to a large extent of building materials primarily, lumber, blocks and concrete. However, there may be small amounts of hazardous substances, to include fuels, propane cylinder, old stove etc. These materials must be handled with care to avoid spills that could negatively impact the environment. The remnants of the D`leau Gommier forest station does not contain asbestos material and there is no risk of asbestos contamination.

Therefore, all hazardous material must be removed and properly disposed of at the landfill prior to demolition. Demolition activities may pose significant hazards related to the stockpiling and removal of construction debris, fugitive dust formation from raw materials, noise from equipment and improper use of tools and equipment by the demolition crew.

Potential fall of materials or tools, as well as ejection of solid particles from abrasive or other types of power tools can result in contractor and workers injuries. Noted that the D`leau Gommier forest station is located within the Central Forest Reserves and there is no human habitation or buildings in close proximity that may be impacted by the demolition activities.

### 4.2 Construction Phase

Waste generated from the construction will be sorted based on organic and inorganic material. All inorganic waste, primarily metals and hard plastic will be disposed of at the landfill managed by the Dominica Solid Waste Management Corporation.

#### 4.2.1 Site Access and Security

Access to D`leau Gommier Forest Station is less than 100 metres from the main road – the highway to the Douglas Charles Airport. Once the vegetation is removed, the site is clearly visible from the highway.

Therefore, the area must be secured during construction to avoid the incidents of theft of building material or vandalism of the construction site. Access to the site must be restricted by a chain linked fenced which must be locked at the end of the day`s work.

#### 4.2.2 Noise and dust control

Noise and dust will have minimal impact on of the flora and fauna in the area. There are large areas of contiguous natural forests that would facilitate ease of natural relocation of wildlife. There is no information to suggest any particular species of wildlife could be endangered by the construction works.

However, during renovation activities, noise and vibration may be caused by the operation of motorized equipment or power tools such as jackhammer and electric saw. Recommended noise reduction and control strategies to be applied as there are wildlife roaming the forested area. Fugitive dust formation from demolition, cutting activities can trigger respiratory illnesses for contractor workers.

#### 4.2.3 Sewage Disposal

The pristine nature of the location must be protected at all costs with no exception. Thus, the contractor must erect portable toilets (men and women) and arrange with the Dominica Solid Waste Management Corporation (DSWMC) or a private contractor to remove all waste from the site at set intervals.

#### 4.2.4 Debris and solid waste management

During the screening process of the dilapidated forest station it was observed that are numerous shrubs and trees covering the entire structure, which would require removal and disposal. These items will be disposed of in accordance with the Dominica Solid Waste Management Corporation requirements and at an approved disposal site. The EALCRP PIU Environmental Safeguards Specialist will monitor the relocation/disposal of these materials to ensure compliance with the laws of Dominica and the World Bank environmental and social standards and policies.

The demolition of this forest station will likely generate construction wastes such as live trees, damaged lumber, scrap metal (zinc sheeting). The construction process will generate similar waste as the demolition but in different composition and will include cement bags, pieces of wood, building materials, nails, scrap metal etc. All waste materials from this rehabilitation works will be separated and disposed of at a disposal site approved by the Dominica Solid Waste Management Corporation (DSWMC). Solid waste management does not only include construction waste, but caters for the disposal of personal waste (such as excess food, containers, wrappings etc) should be removed fromm site on a weekly basis if not sooner. All actions must

be taken to avoid the entry of vermins, stray animals and cats into the site by proper disposal and securing and covering of food scraps. etc.

#### 4.2.5 Traffic management

This forest station is located approximately 1.2 mile from the D`leau Gommier Community along the Nicholas J Liverpool Highway in the village of Belles. The old ruins of the station are situated just off the highway (less than 100 ft) from the main road which leads to the Douglas Charles Airport on the northeast of the Island. Though the site of rehabilitation works of the D` leau Gommier forest station exits into a major road, minimal traffic management will be required. The incidence of road accidents involving project vehicles during construction should be minimized through a combination of education and awareness-raising, adoption of road safety procedures and mounting or placement of directional and cautions signs to reduce traffic congestion and increase the safety of all road users. Caution signs will be used to demark the construction site. Traffic signs must be erected along the road to alert drivers to the increased traffic of construction vehicles and indicating drivers to reduce speed as heavy vehicles may be entering the main road from the construction site. Drivers or construction vehicles entering the main road from the construction site must also exercise caution and give right of way to vehicle on the main road.

#### 4.2.6 Workers Health and Safety

The rehabilitation works to the D`leau Gommier forest station will expose contractor and workers to potential health and safety risks associated with the normal building construction operations. This exposure to health and safety risks will require the contractor to develop an occupational health and safety plan (OHS) to prevent or reduce the risk of accidents at the work site, analyzing potential risks of the jobs (job hazard analysis – JHA) and avoiding or mitigating them, including, but not limited to, providing personal protection equipment (PPE) to workers.. As such, the contractor will be responsible for implementing international good practice and safe work procedures in high-risk activities (such as when working on heights, scaffolds and ladders), and providing the appropriate PPE such as safety boots, helmets, reflector vest, gloves, protective clothes, dust mask, goggles, and ear protection at no cost to the workers.

The remnants of the D`leau Gommier forest station is located in the Central Forest Range and as of such may provide a habitat for wildlife to include snakes, bats and lizards etc. During demolition all wildlife will naturally move away from the construction site into the forested areas. Dominica has several species of snakes all which are non-poisonous. The Boa constrictors is the largest snake specie in Dominica and posed minimal risk to humans. These snakes are feared by humans and therefore naturally moves away from areas frequented by humans. Insects repellent can be used for mosquitoes and other nuisance pest encountered during renovation works.

A well-stocked first aid kit equipped with medication and supplies to treat basic construction related injuries, and in this specific case, including insect or other animal bites, must be available to workers. The Contractor will also be required to prepare and submit a Code of Conduct to the EALCRP PIU for review and acceptance (**Annex 4**). Additionally, the contact information and location of health professionals functioning in this health district should be available to the

Contractor for quick advice on health related issues or treatment of minor injuries. The Contractor must also prepare an Emergency Response Plan to address potential accidents during construction.

Any accidents or near misses on the construction site must be documented and investigated, including the Root Cause Analysis (RCA). The Supervisor or safety Officer assigned to the project must also check to see if there are any immediate risk of danger associated with the accident; secondly, ensure that the injured receives the appropriate medical attention. Thirdly, the matter should be reported to the PIU Office, where it is verified as to the cause and provision of corrective and preventative measures and immediately communicated to the World Bank E&S Specialists.

#### 4.2.7 Pest Management

Prior to construction of the forest station the entire perimeter of the construction site must be treated to prevent the infestation of termites. In light of the sensitive nature of the site (a forest reserve), every precaution must be taken to select the safest and most effective insecticides for managing potential insect, one with little damage or no negative impact on the natural environment.

All necessary precautions must be taken and enforced according to the Integrated Pest Management Plan set for the EALCRP (<http://piu.agriculture.gov.dm/>) safeguard section. Safety pesticide application guidelines are also outlined in Chapter 5 of this ESMP. Contractors or Pesticide Applicators can also refer to easy to follow guidelines on the Safe and Effective Use of Pesticides (SEUP), that can be found on the project website (<http://piu.agriculture.gov.dm/>) safeguard section.

#### 4.2.8 Soil and Water Contamination

The Central Forest Reserve has a high rainfall pattern, averaging to over 7620mm annually, with such high rainfall any contaminants on the soil surface can be easily leached into the ground water. All liquid contaminants must be properly stored prior to disposal to reduce the risk of spillage in this sensitive area.

The management of human wastes on site is also critical for maintaining a healthy working environment and reducing the risk of faecal contamination. The contractor will be responsible for providing and adequately managing portable sanitary units.

### 4.3 Operation Phase

The potential impacts of the operations include wastewater, waste management, energy and water consumption, staff health and safety, COVID 19 measures and emergency response.

In consideration of the fact that Covid 19 will be with us for a long time and also recognizing that from time to time, the existing protocols will have to be revised accordingly, during the operational phase, the occupants will adhere to the prevailing Government of Dominica's

COVID19 protocol to protect employees and visitors during operational hours to reduce the risk of spread of the COVID 19.

Accordingly, on entry all employees and visitors will be required to adhere to the current Covid19 protocol. This would include the wearing face masks, temperature check and sanitize of hands among other measures that may be in force at the time. The COVID 19 guidelines will be provided to all employees working on site (See Annex 2 and 3).

#### 4.3.1 Forced Labour

The Project will not use of forced labour and/or child labour. The Contractor shall have in place, a grievance redress mechanism for workers to raise workplace concerns and grievances including instances of forced labour. If the Contractor is unable to develop and implement a grievance redress mechanism (GRM), workers will be directed to use the EALCRP PIU's GRM to register complaints, issues or concerns.

#### 4.3.2 Child Labour

No person under the age of 18 years will be employed or engaged in any project activity. Contractor will enforce Code of Conduct (see Annex 4) to prevent child labour; i.e., any person, 18 year or below, forced labour; persons working against their own free will, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerned.

#### 4.3.3 Gender Based Violence

This project does not foresee and is not at high risk project for SEA/SH cases. However, some cases such as that of sexual exploitation and sexual abuse/ sexual harassment (SEA/SH) are sensitive and may not be reported due to the risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence and survivors may be unwilling to approach the authorities. Therefore, the contractor will need to put in place multiple channels for mitigating and registering complaints in a safe and confidential manner.

The Contractor should also include in the code of conduct (annex 4) measures to address sexual exploitation and abuse and sexual harassment incidents that may occur in the work place

#### 4.3.4 Disability Inclusion

The Project is keen to include people with disabilities into design and implementation of the project activities and prevent discrimination against disability. Discrimination on the basis of disability means creating a distinction, exclusion, or restriction which has the purpose or effect of impairing or excluding a person with disability from being on an equal basis with others, thereby potentially enhancing the negative impacts of the project or limiting project benefits or being able to voice comments or concerns during stakeholder engagement. The project will analyse and identify people with disabilities and provide opportunities 1) to include vulnerable and disadvantaged stakeholders in the information disclosure and consultation process in a meaningful way and 2) to include accessibility measures in project design, where financially and

technically feasible, if disability risks and impacts have been identified as part of potential project impacts. Sound mitigation measures can result in not only an inclusive project, but demonstrate good international practice, and can raise awareness on disability issues and accommodating needs of vulnerable groups.

Photo#5. Designs to include handicap access ramp



## Chapter 5. Mitigation Measures

This section of the ESMP provides the mitigation measures to address each of the environmental and social risks identified in Chapter 4. Detailed/specific mitigation measures are provided in sections 5.1, 5.2 and 5.3 below for demolition, construction and operation of the D`leau Gommeir Forest Station respectively.

### 5.1 Demolition Phase

Aspect	Potential Impacts	Proposed Mitigation
Site preparation activity	<ul style="list-style-type: none"> <li>○ Poor air quality due to emissions from vehicles and dust generated</li> <li>○ Respiratory impacts on site workers.</li> <li>○ Noise generation from the use of machines and demolition equipment with its impact on workers and wildlife in the area.</li> </ul>	<ul style="list-style-type: none"> <li>○ Designating an area or waste bin for stockpiling construction materials.</li> <li>○ Stockpile materials must be covered to avoid dust emissions</li> <li>○ Work activities will be conducted during regular working hours 8 am to 5 pm.</li> <li>○ PPEs - Dust masks / respirators when working in demolition areas, etc. (according to approved procedures)</li> <li>○ PPEs - Hearing protection for working around machinery where the noise exceeds 85 dB (sound from a lawn mower)</li> <li>○ The location of noisy machinery can be positioned away from forested area and towards the public road.</li> <li>○ Maintain vehicles and Contractors machinery according to maintenance requirements.</li> </ul>

## 5.2 Construction Phase

Aspect	Potential Impacts	Proposed Mitigation
Construction Waste and Debris	<ul style="list-style-type: none"> <li>○ Improper storage and/or disposal of materials</li> <li>○ Dispersion of materials in the forest, waterways or other sensitive areas.</li> </ul>	<ul style="list-style-type: none"> <li>○ The contractor shall handle demolition /construction material debris and solid waste in accordance with approved procedures of Dominica Solid Waste Management Corporation (DSWMC).</li> <li>○ Construction wastes must be stockpile away from circulation areas and not pose safety hazards to workers, Office Staff and visitors; wastes must be stored in covered containers and removed from the site on a regular basis; containers must not overflow.</li> <li>○ The contractor should only dispose of materials in areas approved by the DSWMC.</li> <li>○ Collect and segregate wastes based on their classification and ensure disposal by the DSWMC.</li> <li>○ Absolutely, No burning of waste material on site.</li> <li>○ Ensure appropriate and safe disposal of contaminants such as fuels, construction materials and wastes.</li> <li>○ In case of accidental waste spills, the relevant environmental authority shall be informed, and restoration measures shall be applied.</li> <li>○ Workers should be issued PPEs to include helmets, ear plugs, face shield, goggles, gloves, safety shoes etc.</li> <li>○ Provide PPE's including hearing protection when working around machinery noise exceeds 85 dB; wear dust masks / respirators.</li> <li>○ Maintain vehicles and Contractors machinery according to maintenance requirements.</li> <li>○ Prevent unauthorized persons access to the Site.</li> <li>○ Ensure immediate cleaning of any spills and remediation of contaminated areas after construction.</li> </ul>
Pesticide application	The risk of pesticide application may lead to accidental exposure	<ul style="list-style-type: none"> <li>○ Ensure that pesticides to be used are registered by Dominica Pesticide Board</li> <li>○ Ensure workers use the appropriate PPE's when applying pesticides</li> </ul>

Aspect	Potential Impacts	Proposed Mitigation
	inhalation, spillage and entry into the natural ecosystem	<ul style="list-style-type: none"> <li>○ Read label and abide by the instructions, to include storage &amp; disposal, direction for use, precautionary statements and first aid.</li> <li>○ Pesticides should be applied after working hours.</li> <li>○ Follow the project Integrated Pest Management Plan (IPMP).</li> </ul>
Hazardous materials handling, storage, use and transportation	<ul style="list-style-type: none"> <li>○ Potential generation of hazardous wastes (lubricants, oils, painting, thinners, etc.).</li> <li>○ The risk of accidental discharge of hazardous products, leakage of hydrocarbons, oils or grease from construction machinery.</li> </ul>	<ul style="list-style-type: none"> <li>○ Ensure that storage containers of hazardous substances are always in good condition and tightly closed.</li> <li>○ Ensure that storage facilities are provided impervious surfaces and bunds/secondary containment to control spill in case of accidental spillage</li> <li>○ Maintain Safety Data Sheets (SDS) for hazardous materials onsite</li> </ul>
Sewage/Wastewater Management	Improper disposal and treatment of sewage/wastewater	<ul style="list-style-type: none"> <li>○ Portable sanitary units will be established to collect human wastes. Human waste will be disposed at sewage treatment facility to comply with local laws and regulations of Dominica.</li> <li>○ A sewerage system can also be constructed on site in full compliance with the Environmental Health requirements. During the operational phase it is not expected that the liquid waste will be removed to a treatment plant outside the immediate area. At one time, the old station functioned with a sewer system)</li> </ul>
Dust and noise from construction or demolition activity	<ul style="list-style-type: none"> <li>○ Poor air quality due to emissions from vehicles and dust generated</li> <li>○ Respiratory impacts on site workers.</li> <li>○ Noise generation from the use of machines and construction equipment with its impact on workers.</li> </ul>	<ul style="list-style-type: none"> <li>○ Dust suppression methods such as wetting materials, dust barriers/curtains, or slowing work should be employed as needed to avoid visible dust from demolition or construction activities</li> <li>○ Dust masks / respirators when working in closed areas such as access manholes, etc. (according to approved procedures)</li> <li>○ PPEs - Dust masks / respirators when working in demolition areas, etc. (according to approved procedures)</li> <li>○ PPEs - Hearing protection for working around machinery where the noise exceeds 85 dB (according to approved procedures)</li> </ul>

Aspect	Potential Impacts	Proposed Mitigation
		<ul style="list-style-type: none"> <li>○ The location of noisy machinery (including generators) can be positioned away from sensitive sites.</li> <li>○ Maintain vehicles and Contractors machinery according to maintenance requirements.</li> </ul>
Traffic Management during rehabilitation activities	Traffic congestion and unsafe transportation of construction materials on and off site.	<ul style="list-style-type: none"> <li>○ Ensure that a Traffic Management Plan is in place where this might be an issue.</li> <li>○ Ensure that contractor employs safe drivers.</li> <li>○ Prevent storage of construction materials, equipment and machineries on the road traffic lanes.</li> <li>○ Avoid transporting materials during wet conditions.</li> <li>○ Maintain the free movement of traffic on project access roads.</li> <li>○ Site access roads are to remain free of any spillage.</li> <li>○ Establish road signage to warn and inform pedestrians and vehicular traffic of the proposed site and movement of equipment.</li> </ul>
Workers' health and safety	Workers' accidents on the construction site	<ul style="list-style-type: none"> <li>○ Contractor must prepare and submit incident reports, including investigation on the Root Cause Analysis (RCA) to the PIU.</li> <li>○ Train workers on prevention of accidents and managing incidents.</li> <li>○ Workers must wear personal protective equipment (PPE).</li> <li>○ Develop and implement an Emergency Response Plan to address potential accidents and incidents.</li> <li>○ Provide first aid kit and emergency plan for accidents or incidents.</li> <li>○ Proper supervision of the construction workforce.</li> <li>○ Contractor must develop and implement Management Strategies and Implementation Plans (MSIP) including a site-specific OHS management plan for the most dangerous activities, such as, working on heights (ladder or scaffolding), among others and develop Standard Operation Procedures -SOP prior to the start of works.</li> <li>○ Contractors must also develop a Job Hazard Analysis and convene Daily Safety Talks.</li> </ul>

<b>Aspect</b>	<b>Potential Impacts</b>	<b>Proposed Mitigation</b>
Soil and Water Contamination	Contamination of soil and water	<ul style="list-style-type: none"> <li>○ Store all hazardous material in sealed container to avoid accidental spillage.</li> <li>○ Hazardous material should be disposed of at the designated area in the landfill in the quickest possible time.</li> <li>○ Contractor should allow for more frequent collection of contaminants so as to reduce storage time.</li> <li>○ All mitigation activity to construction waste and debris should apply</li> </ul>
COVID 19 Response Measures	Exposure and spread of infection	For COVID -19 management on the construction site follow the infection control protocol in <b>Annexes 2 and 3.</b>
Workers sexual exploitation, sexual abuse and sexual harassment	Physical, psychological abuse of a sexual nature interferes with the productivity of work and displays a lack of respect for project workers	<ul style="list-style-type: none"> <li>○ Contractor must prepare and submit incident reports to the PIU and World Bank.</li> <li>○ Contractor is required to develop and implement a Code of Conduct reflecting community, health and safety prevention and mitigation measures, including, prevention of gender-based violence and sexual exploitation and abuse (Annex 4)</li> </ul>
Labour and working conditions	unfair treatment and discrimination and unequal opportunity of project workers	<ul style="list-style-type: none"> <li>○ No person under the age of 18 years will not be employed or engaged in any project activity.</li> <li>○ Contractor will enforce Code of Conduct to prevent child labour i.e any personal 18 year or below and forced labour, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerned.</li> <li>○ The Contractor will develop a grievance Redress Mechanism, so that workers can file complaints or develop a means where employees concerns are address.</li> </ul>

### 5.3 Operation Phase

<b>Aspect</b>	<b>Potential Impacts</b>	<b>Proposed Mitigation</b>
Occupational Health and Safety	Worker/employee accidents/injury on property on property	<ul style="list-style-type: none"> <li>○ Train staff how to use PPE and ensure there is adequate supply</li> <li>○ Regularly monitor performance and conduct maintenance of equipment</li> </ul>

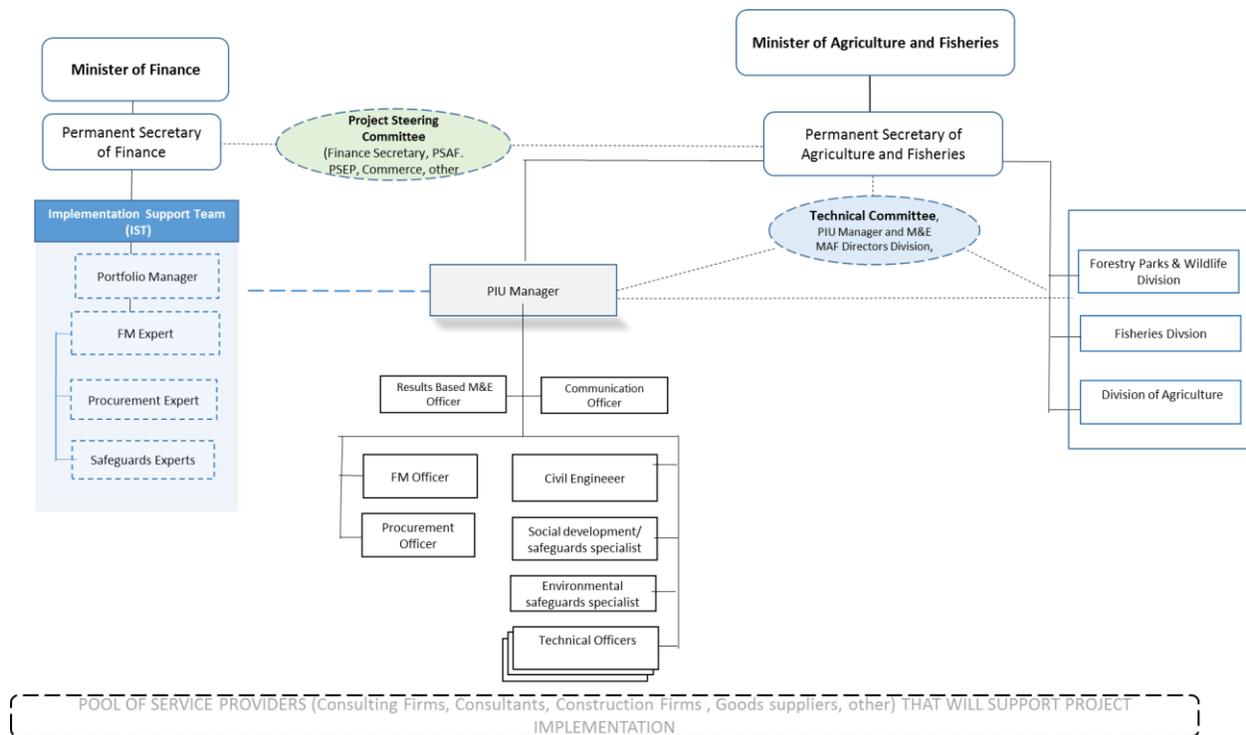
Aspect	Potential Impacts	Proposed Mitigation
Sewage/Wastewater Management	Improper disposal and treatment of sewage/wastewater	<ul style="list-style-type: none"> <li>○ A sewerage system will be established with strict compliance with the Environmental Health regulations. During the operational phase of the old forest station, there existed a stand-alone sewerage system.</li> </ul>
Waste Management	Improper disposal of solid waste	<ul style="list-style-type: none"> <li>○ Solid waste will be stored in designated containers with lids between collection times, collected and disposed of by DSWMC.</li> </ul>
COVID 19 Response Measures	Exposure and spread of infection	<ul style="list-style-type: none"> <li>○ Visitors or users of the facility shall follow all Covid19 protocols in existence at the time of visitation. These may include but not limited to the wearing of face mask, have their temperature checked and hands sanitized.</li> <li>○ Adopt social distancing or physical distancing (at least 6 feet) for staff workstations</li> <li>○ Report any occurrence of any Covid -19 cases of any workers or family members or persons in contact with those infected.</li> <li>○ Record and monitor occurrence rates in order to identify when infection rates become higher than the average and must be reported to the Bank.</li> <li>○ Follow national guidelines and the WHO guidelines for construction works in Annex 2 and the ESF Safeguards Interim Note Construction Civil Works COVID.pdf. (Annex 3).</li> </ul>
Emergency Preparedness and Response	<ul style="list-style-type: none"> <li>○ Accidental fire</li> <li>○ Injury to staff or visitors</li> <li>○ Natural disasters (hurricane, earthquake, flooding, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>○ Contractor shall Develop an Emergency Preparedness and Response Plan to address the most common and likely emergency medical, technical and natural disasters' events</li> <li>○ Fire extinguisher must be in a strategic location in the office.</li> <li>○ First aid kit must be well equipped for treatment likely to be required before transportation to hospital or health centre</li> <li>○ Develop training plan to address firefighting and evacuation in case of earthquakes, hurricane and flooding</li> </ul>

# Chapter 6. Project Management and Institutional Arrangements

## 6.1 ESMP Implementation Responsibilities

The overall responsibility of ensuring that the mitigation measures under this ESMP are implemented are with the EALCRP Project PIU, Project Manager, Environmental and Social Safeguards Specialists. The figure below provides an overview of the organizational structure that will support and implement the EALCRP Project.

### PIU/EALCRP



The PIU will have the overall responsibility for project implementation. The Project Implementation Unit (PIU) is physically located at 19 King George V St, Roseau. A Project Manager will lead the day-to-day implementation of the project and will report to the Permanent Secretary, Ministry of Blue and Green Economy, Agriculture and National Food Security on the coordination of efforts with other partners, and for technical coordination of activities financed under the project.

This rehabilitation of the D`leau Gommier Forest Station will also seek the assistance of the Ministry of the Environment, Rural Modernization and Kalinago Upliftment, in particular the Forestry Division, Parks and Wildlife whom are the beneficiaries of such venture.

The PIU environmental and social specialists will be responsible for the day-to-day activities in instructing and monitoring compliance with World Bank safeguards and the relevant laws of Dominica, including this ESMP. When required, additional safeguards support will be provided by the Implementation Support Team (IST) to manage the preparation, updating and implementation of the relevant safeguards instruments or through contractors hired for specific E&S or safeguards related tasks.

## 6.2 Contractor Responsibilities

Engagement of Contractors will be managed by the EALCRP PIU. Standard environmental and social related requirements will be included in the bidding documents, including compliance with this ESMP. Therefore, for purposes of cost estimation and budgeting, the contractors should be aware of the existence of the environmental mitigation measures and associated ESMP requirements established herein and include cost items for such purposes in their proposals.

Environmental and social related clauses will also be developed and appended to or incorporated into contracts and shall remain in force throughout the contract period.

## 6.3 Supervision, Monitoring and Reporting

It is the responsibility of the PIU Environmental Safeguards Specialist to ensure that the ESMP is being followed by the contractor(s) and site workers. This will be done by conducting monthly site visits as required throughout out the renovation phase. The PIU Project Engineer is the technical person for monitoring that the construction specifications are met and provides regular site inspection. The PIU Project Engineer and the Environmental Specialist are in constant communication to ensure that all safeguard procedures are met.

During the rehabilitation phase, primary environmental and social monitoring will be carried out by the Contractor, with support from the PIU Project Engineer to provide oversight on technical aspects. In addition, the PIU Project Engineer will be required to prepare and submit reports (monthly/quarterly) to the EALCRP PIU Project Manager. These reports provide update on construction works to include: overall project timeline completion status, action items, project risks, non-conformities. The environmental safeguards specialist will ensure the contractor is complying with the environmental and social and health and safety requirements and the proposed mitigation plans. The Environmental Safeguards Specialist must provide a monitoring report to the Bank on a quarterly basis.

## Chapter 7. Stakeholder Engagement

### 7.1 Consultations

On February 25, 2022 a consultation was conducted with key Staff of the Forestry, Wildlife and Parks Division to discuss the development and construction of the three Forest Stations island wide to include based on their location; Delices, Calibishie, and D`leau Gommier. This early engagement with the primary Beneficiaries allows for input from the Forestry Staff and their expectations of the forest stations. Outcomes for the meeting included the new design to the forest station, all Staff members agreed to a conference room/ meeting hall, separate male and female washroom, kitchen and sleeping quarters must be included at all forest station. The project would also be entitled to secure the perimeter of the building allowing for sufficient space that a nursery can be developed independently of the project, by the Beneficiary. Handicap facilities, such as a ramp must also be included for persons and Staff with disabilities (see photo # 5).

<b>Participants</b>	<b>Designation</b>	<b>Concerns</b>	<b>Solution/Result</b>
Mitchinton Burton	Director of Forestry	Delay in project base on time it takes for the conducting safeguard screening and development of the ESMP	He was assured we are in the early stages of developing these documents and ahead of any construction activities. Procurement had just received bid from the RFQ for the supervision and Design of the Forest Stations.
Richie Laville	Forester 1 Northern Range (Calibishie)		
Bradley Guye	Forest Officer	Building a lumber yard for the drying of lumber.	
Norma Anthony	Assistant Forest Officer -Forest Management		
Ronald Charles	Forestry Specialist/PIU	Conducting a Stakeholder engagement of the farmers in the Mangolia Plantation where the forest station is to be housed.	

Participants	Designation	Concerns	Solution/Result
		Contacting land and surveys to clearly identify state lands and survey out a parcel for the Calibishie Forest Station.	
Michael McIntyre	Safeguards/PIU		

On the July 25<sup>th</sup> 2022 a meeting was held with key Staff of the Forestry, Wildlife and Park Division to prioritize on the Forest Station. In attendance were Acting Director of Forestry Ms. Jacklyn Andre; Francisco Maffei, Officer in Charge of conservation, protection and maintenance section. From the PIU were Ronald Charles, Forestry Specialist and Michael McIntyre, Environmental Safeguards Specialist. The outcome of the meeting revealed that the D`leau Gommier forest station, followed by the Calibishie Forest Station and lastly the Delices Forest Station were outline as the order of priority for the Forestry Division. The outcome of the meeting will be forwarded to the Permanent Secretary of the Ministry of Blue, Green Economy and National Food Security for a decision. The Acting Director of Forestry also had the responsibility to inform the Permanent Secretary of Environment of the importance of the Forest Station, to provide further justification and support for the renovation of forest stations for the Forestry Division.

## 7.2 Disclosure

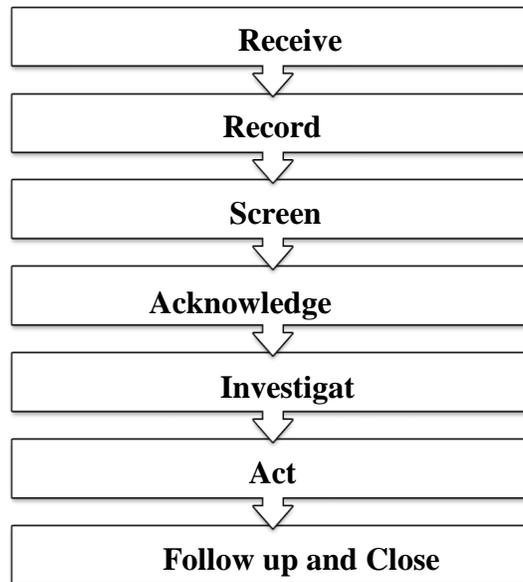
This ESMP is a working document and involves numerous engagements with different stakeholders prior construction. The ESMP will be disclosed on the EALCRP PIU’s website at <http://piu.agriculture.gov.dm/safeguards>, after it has been reviewed and cleared by the World Bank. This disclosure will allow for comments and feedback. Comments and feedback will be incorporated into the final ESMP document. The final ESMP will be disclosed on the EALCRP PIU’s website at <http://piu.agriculture.gov.dm/safeguards>, after it has been reviewed and cleared by the World Bank.

## 7.3 Grievance and Redress Mechanism (GRM)

### 7.3.1 EALCRP PIU GRM

The EALCRP PIU has prepared a project-wide Grievance Redress Mechanism (GRM) to receive and facilitate the resolution of concerns and grievances associated with the PIU and/or project related activities. Any grievances associated with the rehabilitation of the D`leau Gommier forest station will be addressed by the PIU’s GRM. The GRM can be viewed in detail on the EALCRP PIU’s website at <http://piu.agriculture.gov.dm/safeguards>.

The GRM will enable the EALCRP PIU to address any grievances against this specific sub-project activity. It must be noted that this GRM covers grievances that relate to the impacts that the project may have on people and communities. The GRM process is outlined below.



The EALCRP PIU will be responsible for registering, tracking, addressing and resolving any grievances raised by individuals or groups. Grievances can be submitted to the EALCRP PIU:

- **Email:** A complainant can email the EALCRP PIU to complain. Complainant will receive email acknowledging complaint and be advised to complete a grievance form and sign (electronic or by reporting to nearest office).
  - Project Manager, Kervin Stephenson Email: [stephensonke@dominica.gov.dm](mailto:stephensonke@dominica.gov.dm)
  - Environmental and Social Safeguards Specialist, Michael McIntyre Email: [mcintyrem@dominica.gov.dm](mailto:mcintyrem@dominica.gov.dm)
- **Write a letter:** to the EALCRP PIU, Project Manager, Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP), 19 King George V St., Roseau, Dominica to complain (respond to letters via telephone or email, inviting complainant to complete an official grievance form/transfer information from letter to grievance form; record complaint in log)
- **Telephone: Complainants can call the EALCRP PIU at (767) 266 3998**
- **In Person:** Complainants can report to the EALCRP PIU office at 19 King George V St., Roseau, Dominica, to complete and submit a grievance form. They can also register their complaint directly to the Environmental and Social Safeguards Specialists.

- **Anonymous Complaints:** are accepted through all above-mentioned channels. Complainants can submit their grievances without providing personal contact information.
- **PIU Project Manager or Staff Complaints:** Complainants can telephone, email or write letters to the Permanent Secretary, Ministry of Blue and Green Economy and Agriculture and National Food Security.

A grievance will be acknowledged in writing or email, by the EALCRP PIU within five (5) working days of a grievance being submitted to the EALCRP PIU and high-level cases will be responded within 10-20 working days. The EALCRP PIU will communicate verbally, written form or email to the complainant, as well as contact the complainant to verify that the grievance has been resolved and also gather any feedback on the grievance process. Grievances under this GRM are classified as Level 1 (Low Risk), Level 2 (Substantial Risk) and Level 3 (High Risk). While all grievances are considered important and critical, Levels 2 and 3 are classified as high priority, with Level 3 being the highest priority. If the complainant is not satisfied with the resolution and/or does not agree with the proposed actions, the EALCRP PIU will need to escalate the matter to the Grievance Committee. The EALCRP PIU is committed to resolving complainant's grievance and as required will convene an independent Grievance Committee to resolve the grievance.

The EALCRP PIU will communicate the GRM process to its external and internal stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances.

### 7.3.2 World Bank Redress Mechanism

The Grievance Redress Service (GRS) is an avenue for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank project has or is likely to have adverse effects on them, their community, or their environment. The GRS enhances the World Bank's responsiveness and accountability to project-affected communities by ensuring that grievances are promptly reviewed and addressed.

Any individual or community who believes that a World Bank-supported project has or is likely to, adversely affect them can submit a complaint. Complaints must be in writing and addressed to the GRS. They can be sent:

- **ONLINE** – through the GRS website at [www.worldbank.org/grs](http://www.worldbank.org/grs)
- **BY EMAIL** at [grievances@worldbank.org](mailto:grievances@worldbank.org)
- **BY LETTER OR BY HAND** delivery to any World Bank Country Office
- **BY LETTER** to the World Bank Headquarters in Washington at The World Bank Grievance Redress Service (GRS) MSN MC 10-1018 1818 H St NW Washington DC 20433, USA

## Chapter 8. ANNEXES

### Annex 1: Environmental and Social Screening Checklist

The form below identifies potential impacts of the proposed activities envisioned under Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP). Many of the actions or activities have low or negligible potential negative impacts, such as purchase of equipment, raw materials and supplies. Some may have impacts that are typical for small construction or rehabilitation projects, such as repair of damaged infrastructure, buildings, or facilities.

#### Section A: Background information

Subproject Name	Restoration of Key Infrastructure in Forestry
Subproject Purpose	<input checked="" type="checkbox"/> New Structure <input type="checkbox"/> Expansion of existing structure <input type="checkbox"/> Renovation of existing structure <input type="checkbox"/> Construction of waste disposal system
Subproject Location	D`leau Gommier
Subproject property ownership	<input checked="" type="checkbox"/> Government of the Commonwealth of Dominica <input checked="" type="checkbox"/> Own <input type="checkbox"/> Lease Agreement
Subproject current property use	<input type="checkbox"/> Industrial <input checked="" type="checkbox"/> Commercial <input type="checkbox"/> Agricultural <input type="checkbox"/> Residential
Subproject Component	Rehabilitation of D`leau Gommier Forest Station
Estimated Investment	
Start/Completion Date	August 2022 to December 2022

#### Section B: Construction Issues

Will the sub-project:	Yes	No
Demolish existing structures and require disposal of construction materials? ?	X	
Demolish existing structures and require disposal of hazardous materials?	X	
Involve the generation of a significant amounts of solid and liquid waste?	X	
Construction work generate emissions to the atmosphere (dust, odours, fumes)?	X	
Construction work cause a noise nuisance due to the operation of heavy machinery and other on-site activities?	X	
Construction work produce significant amounts of runoff, change drainage patterns and/or erosion?		X
Construction work affect traffic or public safety?		X
Cause physical changes in topography and land use?		X

If answers to any of the above is 'yes', please include an ESMP in sub-project implementation.

#### Section C: Environmental Issue

Will the sub-project	YES	NO
Create a risk of increased soil erosion?		X

Create a risk of increased deforestation?		X
Create a risk of increasing any other soil degradation?		X
Affect soil salinity and alkalinity?		X
Divert the water resource from its natural course/location?		X
Cause pollution of aquatic ecosystems by sedimentation and agro-chemicals, oil spillage, effluents, etc.?		X
Introduce exotic/alien plants or animals?		X
Involve drainage of wetlands or other permanently flooded areas?		X
Cause poor water drainage and increase the risk of water-related diseases such as Dengue?		X
Reduce the quantity of water for the downstream users?		X
Result in the lowering of groundwater level or depletion of groundwater?		X
Create waste that could adversely affect local soils, vegetation, rivers and streams or groundwater?		X
Reduce various types of livestock production?		X
Focus on biomass/bio-fuel energy generation?		X

If answers to any of the above is 'yes', please include an ESMP in sub-project implementation.

#### Section D: Socioeconomic Issues & Community Health and Safety

Will the sub-project:	YES	NO
Displace people from their current settlement?		X
Cause an influx of labour?		X
Interfere with the normal health and safety of the worker/community?		X
Reduce the employment opportunities for the surrounding communities?		X
Reduce settlement (no further area allocated to settlements)?		X
Reduce income for the local communities?		X
Increase safety concerns due to introduction of the project?		X
Increase exposure of the community to communicable diseases such as HIV/AIDS?		X
Induce conflict?		X
Introduce new practices and habits?		X
Lead to child delinquency (school drop-outs, child abuse, child labour, etc.)?		X
Lead to gender disparity or gender-based violence?		X
Lead to poor diets?		X
Lead to social evils (drug abuse, excessive alcohol consumption, crime, etc.)?		X
Cause an increased exposure of the community to COVID-19?	X	

#### Section E: Natural Habitat

Will the sub-project:	YES	NO
Be located within environmentally sensitive areas (e.g., intact natural forests, mangroves, wetlands) or threatened species?	X	
NB: If the answer is yes, the sub-project should prepare a Natural Habitats Plan (see ESMP).		

Adversely affect environmentally sensitive areas or critical habitats – wetlands, woodlots, natural forests, rivers, protected areas including national parks, reserves or local sanctuaries, etc.)?		X
NB: If the answer is yes, the sub-project should not proceed.		
Affect the indigenous biodiversity (flora and fauna)?		X
NB: If the answer is yes, the sub-project should not proceed.		
Cause any loss or degradation of any natural habitats, either directly (through project works) or indirectly?		X
NB: If the answer is yes, the sub-project should not proceed.		
Affect the aesthetic quality of the landscape?		X
Reduce people's access to the pasture, water, public services or other resources that they depend on?		X
Increase human-wildlife conflicts?		X
Use irrigation system in its implementation?		X

NB: If the answers to any of the above is 'yes', please include an ESMP/Natural Habitat Management Plan with sub-project application

#### Section F: Pesticides and Agriculture Chemicals

Will the sub-project:	YES	NO
Involve the use of pesticides or other agricultural chemicals, or increase existing use?	X	
Cause contamination of watercourses by chemicals and pesticides?		X
Cause contamination of soil by agrochemicals and pesticides?		X
Experience effluent and/or emissions discharge?		X
Export produce? Involve annual inspections of the producers and unannounced inspections?		X
Require scheduled chemical applications?		X
Require chemical application even to areas distant away from the focus?		X
Require chemical application to be done by vulnerable group (pregnant mothers, chemically allergic persons, elderly, etc.)?		X

If the answer to the above is 'yes', please consult the IPMP that has been prepared for the project.

#### Section G: Vulnerable and Marginalized Groups meeting requirements for OP 4.10

Are there:	YES	NO
People who meet requirements for OP 4.10 living within the boundaries of, or near the project?		X
Members of these VMGs in the area who could benefit from the project?		X
VMGs livelihoods to be affected by the subproject?		X
Affect vulnerable people and underserved groups (e.g., children, elderly poor pensioners, physically challenged, women, particularly head of households or widows, etc.)?		X

Require temporary relocation for a vulnerable population affected (children, physically challenged, elderly, minority group etc.)?		X
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If the answer to any of the above is 'yes', please consult the IPP that has been prepared for the project.

### Section H: Land Acquisition and Access to Resources

Will the sub-project:	YES	NO
Require acquisition of land (public or private) (temporarily or Permanently) for its development?		X
Use land that is currently occupied or regularly used for productive purposes (e.g. gardening, farming, pasture, fishing locations, forests)?		X
Displace individuals, families or businesses?		X
Result in temporary or permanent loss of crops, fruit trees and Pasture land?		X
Adversely affect small communal cultural property such as funeral and burial sites, or sacred groves?		X
Result in involuntary restriction of access by people to legally designated parks and protected areas?		X
Be on monoculture cropping?		X

If the answer to any of the above is 'yes', please consult the mitigation measures in the ESMF, and if need be adopt the ARAP guidelines.

### Section I: Proposed action

Summarize the above: Based on the above screening checklist results and the risk identified an ESMP will be developed.	(ii) Guidance
All the above answers are 'No'	<ul style="list-style-type: none"> <li>If all the above answers are 'No', there is no need for further action;</li> </ul>
There is at least one 'Yes'	<ul style="list-style-type: none"> <li>If there is at least one 'Yes', please describe your recommended course of action (see below).</li> </ul>

#### (iii) Recommended Course of Action

Activities and actions with low potential E&S risk require no further safeguards actions. Those with moderate potential risk will be managed using the general ESMF for the Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP), and will typically require that an ESMP be developed. Those with moderate to substantial potential risk will be managed using the tools in the general ESMF for the Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP) along with the additional safety guidance and information provided in this ESMP.

## Annex 2: COVID 19 GUIDELINES FOR CONSTRUCTION AND CIVIL WORKS<sup>4</sup>

### **COVID-19 SAFETY ON THE CONSTRUCTION SITE - MANAGING THE RISKS**

#### **WHAT IS CORONA (COVID-19) DISEASE:**

**The Coronavirus disease (COVID-19) is an infectious disease caused by a newly discovered coronavirus. It is a respiratory disease and is contagious.** Common symptoms include: fever, tiredness, dry cough. Other symptoms include: shortness of breath, aches and pains, sore throat and some people report diarrhea, nausea or runny nose; [https://www.who.int/health-topics/coronavirus#tab=tab\\_1](https://www.who.int/health-topics/coronavirus#tab=tab_1). In March 2020, the World Health Organisation (WHO) declared the COVID-19 a pandemic.

#### **HOW THE COVID-19 DISEASE SPREADS:**

When someone who has COVID-19 coughs or exhales they release droplets of infected fluid. Most of these droplets fall on nearby surfaces and objects, people could catch COVID-19 by touching these contaminated areas and then touching their eyes, nose, mouth or face in general. If they are standing within 2 metres (6.4 feet) of a person with COVID-19 they can catch it by breathing in droplets coughed out or exhaled by them. COVID-19 spreads in a similar way to flu. ANYONE can become infected.

Xxxxxxxx

It should be noted that at the height of the Covid19 pandemic here, government declared the construction industry an essential service and so construction activities were allowed to continue as long as the contractor was able to provide the workers with the stipulated social distancing arrangements on the construction site.

***It is highly recommended that any worker who has any symptoms related to cold, flu or COVID-19 should be immediately isolated and proper procedure followed as advised by the Ministry of Health.***

#### **SIMPLE GUIDELINES TO PREVENT/MANAGE THE SPREAD OF COVID-19 ON YOUR CONSTRUCTION SITE:**

The World Health Organisation and the Ministry of Health in Dominica advises that **physical/social distancing**, **frequent handwashing** and **respiratory etiquette** are important to help prevent the spread of this disease. Please see details of these and other recommended

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<sup>4</sup> This guidance is consistent with the World Bank ESF/SAFEGUARDS INTERIM NOTE: COVID-19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS (April 2020), which is included herein in full as an appendix to this Annex..

measures to safeguard health and safety while on site as follows: **Note:** The Contractor remains responsible for Health and Safety on site.

### **1. Physical Distancing:**

Maintain at least 2 metres (~6 feet) distance between yourself and anyone. Keeping physical distancing between everyone on construction sites will be challenging at times but is a key measure to minimise the spread of COVID-19. To manage risks:

- Limit visitors to the site, only allow authorised, essential personnel
- Limit physical interactions between workers, workers and clients, and workers and other persons at the site (e.g. deliveries) and use other methods such as mobile phone or radio to communicate
- Limit worker numbers on site where possible
- Split shifts where possible into AM and PM or different days based on activity
- Reduce the number of tasks to be completed each day where possible
- Create specific walkways through the construction site to maintain physical separation
- Stagger meal times and breaks to limit the number of workers congregating in one area
- Conduct toolbox and other meetings online, including through an app, where you can. If not, conduct such meetings in wide open spaces to enable workers to keep the required physical distance
- Limit the number of workers in any one particular area, e.g., to use ladder, stairway, etc.
- Postpone non-essential training
- Place signage about physical distancing around the work site where you can

***Identify responsible persons to make sure workers are following the rules for physical distancing. If physical distancing measures causes other health and safety risks, you need to manage those risks too.***

### **2. Health Checks by Contractor**

Monitor your workers for key symptoms of COVID-19, such as fever. Direct all workers (whether they are at the construction site or not) to report to you if:

- They are experiencing any symptoms associated with this disease
- They have been, or have potentially been, exposed to a person who has been diagnosed with COVID-19 or is suspected to have COVID-19 (even if the person who is suspected to have COVID-19 has not yet been tested)
- Encourage workers to report if they observe another worker is displaying any symptoms
- Prohibit workers accessing the site and working if they are displaying any symptoms
- Prohibit workers who have contracted COVID-19 from returning to the workplace until they provide official medical evidence that they are cleared of the virus and fit to work
- Immediately inform the Project Coordinating Unit (PCU), Disaster Vulnerability Reduction Project

***A responsible person should be at the entrance of the site at the beginning of each work day to do these basic health checks and record yes/no to the checks.***

### **3. Workers Hygiene**

All workers/persons on site are required to practice good hygiene. This includes:

- **Frequent Hand Washing** - Properly wash your hands as often as possible with soap and water for no less than 20 seconds, including before and after eating and after going to the toilet. Use designated hand washing areas located on the site. Signs identifying the locations should be posted.
- Use alcohol-based hand sanitisers with at least 60% ethanol or 70% isopropanol as the active ingredient where hand washing is not possible
- **Respiratory Etiquette** - Use adequate face mask at all times. If unavoidable, cover your mouth and nose with your bent elbow or tissue if you cough or sneeze. Then dispose of the used tissue immediately in a closed bin and wash your hands.
- Have their own personal tools. Where larger tools/equipment/machinery are used, these should be cleaned and disinfected by them before and after each person has used and worker must also wash hands, both before and after using tools/equipment/machinery
- If gloves are used avoid touching surfaces where possible and clean and disinfect areas or equipment handled. Dispose of gloves in covered bin (if disposable) or sanitise and wash if reusable. Do not share gloves
- Clean and disinfect surfaces frequently
- Practice good personal hygiene, washing body, hair (including facial hair) and clothes thoroughly every day
- Comply with physical distancing of 2 metres/ 6 feet away from others
- Stay home if sick and inform employer immediately
- Avoid touching their face
- Avoid handshakes, knocks, high fives or any other close physical contact
- Refrain from spitting at all times
- No smoking (cigarette butts can carry the virus from your mouth)
- Walk with personal utensils and water. Do not share anything
- Dispose of garbage in a covered bin immediately
- Disinfect and clean all common areas (e.g. washroom, water cooler) after use

***Encourage workers to ensure that their co-workers are following the recommendations to protect their own health, workers health and the health of each their families and friends.***

### **4. Hygiene on Site: Environmental Cleaning**

The amount of time the COVID-19 virus survives on objects and surfaces will vary. Environmental cleaning is one way to remove COVID-19 particles. Construction work unavoidably requires regular touching of objects and surfaces. This means that the usual cleaning schedules on construction sites will need to be increased and specific measures employed. The Contractor is responsible for providing cleaning supplies and ensuring that:

- Frequently touched surfaces on a construction site, including equipment, wheelbarrow, buckets, machinery, ladders, lifts, hoists, handrails and doors, are cleaned and disinfected frequently using appropriate detergent or disinfectant solutions.
- Personal items and items used for work such as tools, glasses and phones are frequently cleaned and disinfected (e.g. using isopropyl alcohol wipes).
- Site amenities, including lunch rooms, site offices, change rooms, toilets, showers, water coolers/ fountains and are to be cleaned industrially and the frequency of this cleaning should increase.
- Workers are trained to clean down tools, machinery, equipment, etc. immediately after use.

#### **5. Deliveries, other contractors/suppliers to the site**

- Non-essential visits to the site must be cancelled!
- Deliveries and other contractors who need to be on site should be given clear instructions (in advance) of the requirements while they are on site (This also includes the Client and Consultant).
- Minimise the number of workers attending to deliveries and contractors as much as possible. Make alcohol-based hand sanitiser available for workers after physically handling deliveries.
- Direct all visiting truck drivers to remain in vehicles and use contactless methods such as mobile phones to communicate with your workers wherever possible.
- Use, and ask deliveries and contractors to use, electronic paper work where possible, to minimise physical interaction. Where possible, set up alternatives to requiring signatures, e.g. confirmation email or a photo of the loaded or unloaded goods as proof of delivery or collection.

#### **6. EMPLOYER/ CONTRACTOR RESPONSIBILITY:**

- **Hand washing areas** - at least three (3) areas should be set up to allow for handwashing; at the entrance to the site, the washroom area and lunch/break area. These should be equipped with liquid soap, running water, paper towels and foot-operated covered bins.
- **Cleaning and Sanitising** - Adopt/schedule more frequent cleaning. To minimise the risk of exposure to COVID-19, the person(s) cleaning should wear gloves (where required) and use alcohol-based hand sanitiser before and after wearing gloves or thoroughly wash hands. This person must take care not to cross-contaminate and should not touch their face. If gloves are used these should be disposed of in a covered bin. Alcohol-based hand sanitiser should be made available throughout the construction site, where practical.
- **Garbage Disposal** - Closed bins with foot pedal or no touch should be provided for workers where appropriate to hygienically dispose of waste and rubbish such as used tissues, immediately after use (or if away from amenities, as soon as possible). Alcohol-based hand sanitiser should be available for workers to use after they dispose of their waste.
- **Washroom facilities** - the construction site should have adequate supplies for good hygiene, such as adequate supply of liquid soap, running water and toilet paper. Washroom facilities must be kept clean, properly stocked and in good working order.

- **Separation of workspace** - adequately delineate between the construction site and the common areas. This could include reminding workers (with posters or through training) to frequently wash their hands with soap and water for at least 20 seconds, or thoroughly sanitise their hands with alcohol-based hand sanitiser, before entering and exiting a common area.
- **Schedule breaks** - adopt a coordinated approach to reducing the number of workers utilising the common areas at a given time (staggering meal/water breaks, start times, coordinating work and planning).
- **Information** - inform workers of workplace etiquette and policies/standards that are expected when utilising common areas (cleaning up after themselves, placing rubbish in bins provided, avoiding putting items such as phones on meal surfaces or prohibit use, sanitising surfaces, etc.)
- **Reducing touch points** - consider reducing the number of touch points for workers, e.g. leaving access doors open where appropriate.
- **Air flow** - consider limiting/ reducing recirculated air-conditioning in common areas (if applicable).
- **Disinfectants/Sanitisers** - the construction site should also be well stocked with alcohol-based hand sanitizer, soap liquids, disinfectants and other suitable cleaning agents, paper towels, etc.

#### **7. EMPLOYEE RESPONSIBILITY:**

- Has a duty to take reasonable care of his/her own health and safety, and to not adversely affect the health and safety of others
- Follow any reasonable policies/directions the Contractor has put in place in response to COVID-19.
- Follow authorized Government directives
- Clean and sanitise work area as advised
- If you suspect or know you have the COVID-19 virus you should:
  - Isolate and seek medical advice by calling the COVID-19 hotline
  - Do NOT go to work
  - Inform your employer as soon as possible and update them if your situation changes, e.g. if it's confirmed you have the virus

#### **8. OTHER GENERAL GUIDELINES:**

- **Consultation and Communication** - The Contractor should keep workers informed
- Where possible consult with workers on health and safety matters relating to COVID-19. Allow workers to express views before decisions are made. Involving them will help build worker commitment to this process and any required changes.
- Avoid/reduce in-person meetings and other gatherings or hold tailgate meetings in open spaces.
- Ensure there is a means for workers to raise concerns (if any) about the steps being taken to manage the risks or any other related concerns.

- Provide all workers with information about the risks of exposure to COVID-19. Where required, workers should be trained in infection control.
- Communicate clearly with workers about control measures.
- Provide clear direction and guidance about what is expected of workers. Workers should know:
  - When to stay away from the workplace
  - What action to take if they become unwell
  - What symptoms to be concerned about
- Remind workers they have a duty to take reasonable care for their own health and safety and to not adversely affect the health and safety of others.
- Provide workers with a point of contact to discuss their concerns, and access to support services, note that dealing with this current pandemic has psychosocial effects as well.
  - Ensure that the DVRP project signboard is erected/visible in case the public wishes to communicate with the PCU.

#### **9. Remain up-to-date**

- Keep your knowledge of the COVID-19 situation up-to-date.
- Follow advice from authorised sources only.
- Ensure the site is properly resourced to manage Workplace Health and Safety (WHS) risks during the COVID-19 outbreak, and check that the resources are being used.
- Review your policies, procedures and reporting process to ensure they remain current for any incidents, hazards and other WHS issues that arise during this time. Update these materials if necessary.
- Ensure these are communicated clearly to all employees and that processes are being followed.

#### **10. Maintain Electronic Employee Register**

- Daily track and monitor workforce present on site
- Prior to commencement of workday record the presence of each worker as they arrive. Also check off against this list as they leave at the end of the workday
- Record if anyone was absent, sent home or isolated for suspected symptoms of COVID-19
- Inform the PCU immediately, once the critical measures have been taken
- Include this register of employees in daily report to Client
- Due to the latency period of COVID-19, it is also important to track where employees have worked, if previously assigned to another worksite or transferred during works. If an employee tests positive for COVID-19, this information would be critical to the public health authorities for contact tracing.

#### **11. Incident Notification**

- if it is suspected that a worker may have contracted COVID-19:

- Notification must be made immediately to the PCU after the Contractor becomes aware of the incident.
- If the incident is discovered while the worker is on site:
  - He/she should be immediately isolated and wear a mask
  - The Contractor should inform the relevant health authorities through the required means
  - The Contractor should then subsequently inform the PCU
- If a person who has been at the site is suspected or confirmed to have COVID-19, the site must be closed and the Contractor must thoroughly clean and disinfect all areas of suspected contamination
- A record of each person on site must be taken, especially noting those in immediate, direct, or close contact with the suspected case
- All workers on the site should also follow recommended guidelines from the Ministry of Health before leaving the site
- Contractor should also monitor and record the rates of infection on site and, in case an outbreak occurs or the rate of infection is higher than normal, it must inform the PIU and the PIU must inform the Bank.

#### **12. Health and Safety Audits**

- This should be updated to reflect the COVID-19 requirements, including visible signage on site
- The H&S Audits should now be submitted weekly

#### **13. Worker Transportation**

- Recommended measures should be followed on public transportation
- If the Contractor provides transportation for workers, an assessment of the number of workers being transported at any one given time should be made and measures taken to ensure required distance.
- Measures include having workers sit one to a seat with riders staggered; adjusting the number of workers taken per trip; and the overall number of trips needed to transport workers to the site. Use of larger vehicles to ensure physical distancing or use of multiple vehicles may be required.
- If these are not possible then use other control measures such as adequate PPE where appropriate.
- Vehicles should be cleaned and sanitized before and after each trip.
- Whenever possible, workers should travel alone in their vehicles.

**N.B: ONLY AUTHORISED ESSENTIAL VISITORS ARE ALLOWED ON SITE AND MUST FOLLOW ABOVE REQUIREMENTS!**

# Annex 3: ESF/SAFEGUARDS INTERIM NOTE - COVID 19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS

INTERIM GUIDANCE ON COVID-19

VERSION 1: APRIL 7, 2020

## **ESF/SAFEGUARDS INTERIM NOTE: COVID-19 CONSIDERATIONS IN CONSTRUCTION/CIVIL WORKS PROJECTS**

*This note was issued on April 7, 2020 and includes links to the latest guidance as of this date (e.g. from WHO). Given the COVID-19 situation is rapidly evolving, when using this note it is important to check whether any updates to these external resources have been issued.*

### **1. INTRODUCTION**

The COVID-19 pandemic presents Governments with unprecedented challenges. Addressing COVID-19 related issues in both existing and new operations starts with recognizing that this is not business as usual and that circumstances require a highly adaptive responsive management design to avoid, minimize and manage what may be a rapidly evolving situation. In many cases, we will ask Borrowers to use reasonable efforts in the circumstances, recognizing that what may be possible today may be different next week (both positively, because more supplies and guidance may be available, and negatively, because the spread of the virus may have accelerated).

This interim note is intended to provide guidance to teams on how to support Borrowers in addressing key issues associated with COVID-19, and consolidates the advice that has already been provided over the past month. As such, it should be used in place of other guidance that has been provided to date. This note will be developed as the global situation and the Bank's learning (and that of others) develops. This is not a time when 'one size fits all'. More than ever, teams will need to work with Borrowers and projects to understand the activities being carried out and the risks that these activities may entail. Support will be needed in designing mitigation measures that are implementable in the context of the project. These measures will need to take into account capacity of the Government agencies, availability of supplies and the practical challenges of operations on-the-ground, including stakeholder engagement, supervision and monitoring. In many circumstances, communication itself may be challenging, where face-to-face meetings are restricted or prohibited, and where IT solutions are limited or unreliable.

This note emphasizes the importance of careful scenario planning, clear procedures and protocols, management systems, effective communication and coordination, and the need for high levels of responsiveness in a changing environment. It recommends assessing the current situation of the project, putting in place mitigation measures to avoid or minimize the chance of infection, and planning what to do if either project workers become infected or the work force includes workers from proximate communities affected by COVID-19. In many projects, measures to avoid or minimize will need to be implemented at the same time as dealing with sick workers and relations with the community, some of whom may also be ill or concerned about infection. Borrowers should understand the obligations that contractors have under their existing contracts (see Section 3), require contractors to put in place appropriate organizational structures (see Section 4) and develop procedures to address different aspects of COVID-19 (see Section 5).

## 2. CHALLENGES WITH CONSTRUCTION/CIVIL WORKS

Projects involving construction/civil works frequently involve a large work force, together with suppliers and supporting functions and services. The work force may comprise workers from international, national, regional, and local labor markets. They may need to live in on-site accommodation, lodge within communities close to work sites or return to their homes after work. There may be different contractors permanently present on site, carrying out different activities, each with their own dedicated workers. Supply chains may involve international, regional and national suppliers facilitating the regular flow of goods and services to the project (including supplies essential to the project such as fuel, food, and water). As such there will also be regular flow of parties entering and exiting the site; support services, such as catering, cleaning services, equipment, material and supply deliveries, and specialist sub-contractors, brought in to deliver specific elements of the works.

Given the complexity and the concentrated number of workers, the potential for the spread of infectious disease in projects involving construction is extremely serious, as are the implications of such a spread. Projects may experience large numbers of the work force becoming ill, which will strain the project's health facilities, have implications for local emergency and health services and may jeopardize the progress of the construction work and the schedule of the project. Such impacts will be exacerbated where a work force is large and/or the project is in remote or under-served areas. In such circumstances, relationships with the community can be strained or difficult and conflict can arise, particularly if people feel they are being exposed to disease by the project or are having to compete for scarce resources. The project must also exercise appropriate precautions against introducing the infection to local communities.

## 3. DOES THE CONSTRUCTION CONTRACT COVER THIS SITUATION?

Given the unprecedented nature of the COVID -19 pandemic, it is unlikely that the existing construction/civil works contracts will cover all the things that a prudent contractor will need to do. Nevertheless, the first place for a Borrower to start is with the contract, determining what a contractor's existing obligations are, and how these relate to the current situation.

The obligations on health and safety will depend on what kind of contract exists (between the Borrower and the main contractor; between the main contractors and the sub-contractors). It will differ if the Borrower used the World Bank's standard procurement documents (SPDs) or used national bidding documents. If a FIDIC document has been used, there will be general provisions relating to health and safety. For example, the standard FIDIC, Conditions of Contract for Construction (Second Edition 2017), which contains no 'ESF enhancements', states (in the General Conditions, clause 6.7) that the Contractor will be required:

- to take all necessary precautions to maintain the health and safety of the Contractor's Personnel
- to appoint a health and safety officer at site, who will have the authority to issue directives for the purpose of maintaining the health and safety of all personnel authorized to enter and or work on the site and to take protective measures to prevent accidents
- to ensure, in collaboration with local health authorities, that medical staff, first aid facilities, sick bay, ambulance services and any other medical services specified are available at all times at the site and at any accommodation
- to ensure suitable arrangements are made for all necessary welfare and hygiene requirements and for the prevention of epidemics

These requirements have been enhanced through the introduction of the ESF into the SPDs (edition dated July 2019). The general FIDIC clause referred to above has been strengthened to reflect the requirements of the ESF. Beyond FIDIC's general requirements discussed above, the Bank's Particular Conditions include a number of relevant requirements on the Contractor, including:

- to provide health and safety training for Contractor's Personnel (which include project workers and all personnel that the Contractor uses on site, including staff and other employees of the Contractor and Subcontractors and any other personnel assisting the Contractor in carrying out project activities)
- to put in place workplace processes for Contractor's Personnel to report work situations that are not safe or healthy
- gives Contractor's Personnel the right to report work situations which they believe are not safe or healthy, and to remove themselves from a work situation which they have a reasonable justification to believe presents an imminent and serious danger to their life or health (with no reprisal for reporting or removing themselves)
- requires measures to be in place to avoid or minimize the spread of diseases including measures to avoid or minimize the transmission of communicable diseases that may be associated with the influx of temporary or permanent contract-related labor
- to provide an easily accessible grievance mechanism to raise workplace concerns

Where the contract form used is FIDIC, the Borrower (as the Employer) will be represented by the Engineer (also referred to in this note as the Supervising Engineer). The Engineer will be authorized to exercise authority specified in or necessarily implied from the construction contract. In such cases, the Engineer (through its staff on site) will be the interface between the PIU and the Contractor. It is important therefore to understand the scope of the Engineer's responsibilities. It is also important to recognize that in the case of infectious diseases such as COVID-19, project management – through the Contractor/subcontractor hierarchy – is only as effective as the weakest link. A thorough review of management procedures/plans as they will be implemented through the entire contractor hierarchy is important. Existing contracts provide the outline of this structure; they form the basis for the Borrower to understand how proposed mitigation measures will be designed and how adaptive management will be implemented, and to start a conversation with the Contractor on measures to address COVID-19 in the project.

#### **4. WHAT PLANNING SHOULD THE BORROWER BE DOING?**

Task teams should work with Borrowers (PIUs) to confirm that projects (i) are taking adequate precautions to prevent or minimize an outbreak of COVID-19, and (ii) have identified what to do in the event of an outbreak. Suggestions on how to do this are set out below:

- The PIU, either directly or through the Supervising Engineer, should request details in writing from the main Contractor of the measures being taken to address the risks. As stated in Section 3, the construction contract should include health and safety requirements, and these can be used as the basis for identification of, and requirements to implement, COVID-19 specific measures. The measures may be presented as a contingency plan, as an extension of the existing project emergency and preparedness plan or as standalone procedures. The measures may be reflected in revisions to the project's health and safety manual. This request should be made in writing

(following any relevant procedure set out in the contract between the Borrower and the contractor).

- In making the request, it may be helpful for the PIU to specify the areas that should be covered. This should include the items set out in Section 5 below and take into account current and relevant guidance provided by national authorities, WHO and other organizations. See the list of references in the Annex to this note.
- The PIU should require the Contractor to 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, the request should emphasize 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 PIU, either directly or through the Supervising Engineer, may provide support to projects in identifying appropriate mitigation measures, particularly where these will involve interface with local services, in particular health and emergency services. 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.

## 5. 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. As discussed above, 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). PIUs and contractors should refer to guidance issued by relevant authorities, both national and international (e.g. WHO), which is regularly updated (see sample References and links provided in the Annex).

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. The issues set out below include a number that represent 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 a different part of the country; workers from another country. 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).
- This should include a breakdown of workers who reside at home (i.e. workers from the community), workers who lodge within the local community and workers in on-site accommodation. Where possible, it should also identify workers that may be more at risk from COVID-19, those with underlying health issues or who may be otherwise at risk.
- Consideration should be given to ways in which to minimize movement in and out of site. This could include lengthening the term of existing contracts, to avoid workers returning home to affected areas, or returning to site from affected areas.
- Workers accommodated on site should be required to minimize contact with people near the site, and in certain cases be prohibited from leaving the site for the duration of their contract, so that contact with local communities is avoided.
- Consideration should be given to requiring workers lodging in the local community to move to site accommodation (subject to availability) where they would be subject to the same restrictions.
- Workers from local communities, who return home daily, weekly or monthly, will be more difficult to manage. They should be subject to health checks at entry to the site (as set out above) and at some point, circumstances may make it necessary to require them to either use accommodation on site or not to come to work.

#### **(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. Possible measures may include:

- 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 behaviors 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](#)).
- 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; in worker accommodation; 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.
- Review worker accommodations, and assess them in light of the requirements set out in [IFC/EBRD guidance on Workers' Accommodation: processes and standards](#), which provides valuable guidance as to good practice for accommodation.
- Setting aside part of worker accommodation for precautionary self-quarantine as well as more formal isolation of staff who may be infected (see paragraph (f)).

### **(d) CLEANING AND WASTE DISPOSAL**

Conduct regular and thorough cleaning of all site facilities, including offices, accommodation, canteens, common spaces. 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). If open burning and incineration of medical wastes is necessary, this should be for as limited a duration as possible. Waste should be reduced and segregated, so that only the smallest amount of waste is incinerated (for further information [see WHO interim guidance on water, sanitation and waste management for COVID-19](#)).

#### **(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. While as of the date of this note, general advice is that construction workers do not require COVID-19 specific PPE, this should be kept under review (for further information see [WHO interim guidance on rational use of personal protective equipment \(PPE\) for COVID-19](#)).
- 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.
- Consider changing canteen layouts and phasing meal times to allow for social distancing and phasing access to and/or temporarily restricting access to leisure facilities that may exist on site, including gyms.
- 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.

#### ▪ **PROJECT MEDICAL SERVICES**

Consider whether existing project medical services are adequate, taking into account existing infrastructure (size of clinic/medical post, number of beds, isolation facilities), medical staff, equipment and supplies, procedures and training. Where these are not adequate, consider upgrading services where possible, including:

- Expanding medical infrastructure and preparing areas where patients can be isolated. Guidance on setting up isolation facilities is set out in [WHO interim guidance on considerations for quarantine of individuals in the context of containment for COVID-19](#). Isolation facilities should be located away from worker accommodation and ongoing work activities. Where possible, workers should be provided with a single well-ventilated room (open windows and door). Where this is not possible, isolation facilities should allow at least 1 meter between workers in the same room, separating workers with curtains, if possible. Sick workers should limit their movements, avoiding common areas and facilities and not be allowed visitors until they have been clear of symptoms for 14 days. If they need to use common areas and facilities (e.g. kitchens or canteens), they should only do so when unaffected workers are not present and the area/facilities should be cleaned prior to and after such use.
- 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.
- Ventilators will not normally be available on work sites, and in any event, intubation should only be conducted by experienced medical staff. If a worker is extremely ill and unable to breathe properly on his or her own, they should be referred immediately to the local hospital (see (g) below).
- Review existing methods for dealing with medical waste, including systems for storage and disposal (for further information see [WHO interim guidance on water, sanitation and waste management for COVID-19](#), and [WHO guidance on safe management of wastes from health-care activities](#)).

#### **(g) LOCAL MEDICAL AND OTHER SERVICES**

Given the limited scope of project medical services, the project may need to refer sick workers to local medical services. Preparation for this includes:

- Obtaining information as to the resources and capacity of local medical services (e.g. number of beds, availability of trained staff and essential supplies).
- Conducting preliminary discussions with specific medical facilities, to agree what should be done in the event of ill workers needing to be referred.
- Considering ways in which the project may be able to support local medical services in preparing for members of the community becoming ill, recognizing that the elderly or those with pre-existing medical conditions require additional support to access appropriate treatment if they become ill.
- Clarifying the way in which an ill worker will be transported to the medical facility, and checking availability of such transportation.
- 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.

#### **(h) 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 COVID-19, 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.

#### **(i) 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.

#### **(j) 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.

#### **(k) 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).

#### **6. EMERGENCY POWERS AND LEGISLATION**

Many Borrowers are enacting emergency legislation. The scope of such legislation, and the way it interacts with other legal requirements, will vary from country to country. Such legislation can cover a range of issues, for example:

- Declaring a public health emergency
- Authorizing the use of police or military in certain activities (e.g. enforcing curfews or restrictions on movement)
- Ordering certain categories of employees to work longer hours, not to take holiday or not to leave their job (e.g. health workers)
- Ordering non-essential workers to stay at home, for reduced pay or compulsory holiday

Except in exceptional circumstances (after referral to the World Bank’s Operations Environmental and Social Review Committee (OESRC)), projects will need to follow emergency legislation to the extent that these are mandatory or advisable. It is important that the Borrower understands how mandatory requirements of the legislation will impact the project. Teams should require Borrowers (and in turn,

Borrowers should request Contractors) to consider how the emergency legislation will impact the obligations of the Borrower set out in the legal agreement and the obligations set out in the construction contracts. Where the legislation requires a material departure from existing contractual obligations, this should be documented, setting out the relevant provisions.

## ANNEX

### WHO Guidance

#### Advice for the public

WHO advice for the public, including on social distancing, respiratory hygiene, self-quarantine, and seeking medical advice, can be consulted on this WHO website:

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public>

#### Technical guidance

[Infection prevention and control during health care when novel coronavirus \(nCoV\) infection is suspected](#), issued on 19 March 2020

[Coronavirus disease \(COVID-19\) outbreak: rights, roles and responsibilities of health workers, including key considerations for occupational safety and health](#), issued on 18 March 2020

[Risk Communication and Community Engagement \(RCCE\) Action Plan Guidance COVID-19 Preparedness and Response](#), issued on 16 March 2020

[Considerations for quarantine of individuals in the context of containment for coronavirus disease \(COVID-19\)](#), issued on 19 March 2020

[Operational considerations for case management of COVID-19 in health facility and community](#), issued on 19 March 2020

[Rational use of personal protective equipment for coronavirus disease 2019 \(COVID-19\)](#), issued on 27 February 2020

[Getting your workplace ready for COVID-19](#), issued on 19 March 2020

[Water, sanitation, hygiene and waste management for COVID-19](#), issued on 19 March 2020

[Safe management of wastes from health-care activities](#) issued in 2014

[Advice on the use of masks in the community, during home care and in healthcare settings in the context of the novel coronavirus \(COVID-19\) outbreak](#), issued on March 19, 2020

### ILO GUIDANCE

[ILO Standards and COVID-19 FAQ](#), issued on March 23, 2020 (provides a compilation of answers to most frequently asked questions related to international labor standards and COVID-19)

## **MFI GUIDANCE**

[IDB Invest Guidance for Infrastructure Projects on COVID-19: A Rapid Risk Profile and Decision Framework](#)

[KfW DEG COVID-19 Guidance for employers, issued on 31 March 2020](#)

[CDC Group COVID-19 Guidance for Employers, issued on 23 March 2020](#)

## Annex 4: Sample Code of Conduct

### **EXAMPLE OF CONTRACTOR'S CODE OF CONDUCT ENVIRONMENTAL, SOCIAL, HEALTH AND SAFETY**

#### **Our Commitment**

Our Company is committed to protecting the environment in which we operate and take pride in conducting our business in a safe and responsible manner. We recognise and accept our responsibility to develop our resources with awareness of the environmental, economic and social needs and expectations of stakeholders.

Our Organisation promotes freedom of expression and open communication and we expect all employees to follow our Code of Conduct. All third-party contractors, sub-contractors, consultants and volunteers are also expected to comply with the code as a condition of their engagement with the Organisation.

No operation is considered effective or complete without proper attention to safety and the environment as detailed in our Organisation's Health and Safety Manual (include as Appendix 1). The health and safety of all employees and those visiting the organisation/ work site are of the utmost importance. We are committed to providing and maintaining a working environment that is safe and without risk to health and safety and is committed to complying with all relevant legislative and project requirements.

All parties are expected to demonstrate a high degree of tolerance and respect for all stakeholders associated with the project, including the indigenous and local communities. The guidelines to be followed are set out in the Code of Conduct requirements below and shall apply to all associated project personnel.

#### **Code of Conduct Requirements**

This Code of Conduct for the project identifies the behaviour which we require from all project personnel and is aligned with our Organisation's Code of Conduct (add as Appendix). Our workplace is an environment where unsafe, offensive, abusive or violent behaviour will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

In this document the term "child" / "children" means any person(s) under the age of 18 years.

#### ***Code of Conduct***

*Each personnel shall comply with the following:*

1. Carry out his/her duties competently, diligently and in accordance with best practice
2. Comply with applicable laws, rules, and regulations of the Country

We will inform our personnel of the applicable legal requirements as identified in the ESMP to ensure that they are aware of the requirements. Each member of our team will be required to familiarise themselves with this document.

3. Compliance with applicable health and safety requirements to protect the local community (including vulnerable and disadvantaged groups), and the Employer's Personnel, including wearing prescribed personal protective equipment [PPE], preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment

It is our duty to ensure that the health and safety requirements are strictly adhered to by all parties. As part of our employment agreement we require that all our personnel must be knowledgeable of our Health and Safety Policy and be informed of the actions required as detailed in the Health and Safety Manual which is in accordance with the ISO 45001. Through our Environmental Specialist, we will assess if any training is required and ensure that this is done. We will also equip all our personnel with the required PPE, and it is mandatory that this be used once on the project site. Safety in workplaces is an un-compromised condition and a mutual and shared responsibility for all our employees.

4. Compliance with environmental requirements identified in the ESMP including erosion control, storm water control, noise and dust control, site cleanliness and disposal of excavated materials and construction wastes
5. Compliance with COVID-19 Prevention Protocols of the Ministry of Health, Wellness and New Health Investment and other national guidance and related protocols

We will remain alert of changing outbreak conditions, locally and regionally, including as they relate to possible community spread or clusters and implement infection prevention measures accordingly. In accordance with OSHA guidelines, our ESHS Experts will periodically assess the hazards to which our personnel and the contractor's workers may be exposed, evaluate the risk of exposure and select, implement, and ensure workers use controls to prevent exposure. All project workers will be trained on the signs and symptoms of COVID-19 and an explanation of how the disease is potentially spread, including the fact that infected people can spread the virus even if they do not have symptoms.

In collaboration with the Project's Safeguards Specialists, we will implement where necessary, standard operating procedures and employee training as it relates to potential exposures. Through our Environmental Safeguards expert, we will ensure to keep updated on all the latest COVID-19 protocols of the Ministry of Health, Wellness and New Health Investments and inform our personnel to ensure these are complied with.

6. Compliance with applicable emergency operating procedures and health and safety requirements

All personnel will be informed of the emergency procedures as prescribed in the project's ESMP and the CESMP which must be strictly complied with.

7. Duty to report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent danger to his/her life or health

Each personnel must assume responsibility for his/ her own health and safety and should report any concerns immediately to the Project Manager/ Site Supervisor, Resident Engineer or ESHS Experts.

8. Respecting reasonable work/ site instructions (including regarding environmental and social norms)

All our personnel are required to be aware of related work/ site instructions and are expected to comply. This is a condition of employment and subject to disciplinary measures if violated.

9. The use of illegal substances

Our Organisation has a zero tolerance for the use of illegal substances - all drugs, alcohol and any controlled substances or medicines. This may result in immediate dismissal if violated. If required, we are prepared to engage the services of a Medical Professional to perform testing for any illegal substances.

10. Sanitation requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)

Adequate sanitary facilities and well-equipped hand-washing stations are expected to be provided by the contractor on this project. It is also expected that the contractor will ensure that these facilities are frequently cleaned and sanitised especially given the risks of COVID-19, as a prevention measure. All project personnel, including the contractor's, are required to use these facilities and will be reminded of this should the need arise.

11. Non-Discrimination and respect in dealing with the Indigenous Peoples, the local community (including vulnerable and disadvantaged groups), the Employer's Personnel, the Contractor's Personnel and other related Project Personnel (for example on the basis of family status, ethnicity, race, gender, religion, culture, language, marital status, birth, age, disability, or political conviction)

Our Organisation firmly believes in respect for all and that everyone should be treated fairly. We will ensure that our personnel are aware of the requirements as prescribed in these project documents and abide by them as a condition of employment. We commit to working in close collaboration with all Social Specialists on this project to ensure that there is non-discrimination and respect for all

stakeholders on the basis of gender, age, physical or mental disability, race, language, culture, political affiliation, philosophic or religious beliefs or any other reason.

Interactions with community members and any affected persons (for example to convey an attitude of respect and non-discrimination, including to their culture and traditions)

All employees are expected to fulfill their duties with integrity and respect toward customers, stakeholders, and the community. We are committed to the highest social performance standards in a manner that respects the environment, culture and customs of the communities within the area of direct and indirect influence of the project. Any complaints received from communities or stakeholders will be investigated in accordance with the Project's Grievance Redress Mechanism.

12. Sexual harassment (for example to prohibit use of language or behaviour, in particular towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)
13. Violence, including sexual and/or gender-based violence (for example acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion, and deprivation of liberty)
14. Exploitation including sexual exploitation and abuse (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading behaviour, exploitative behavior or abuse of power)

Sexual harassment, violence, including gender based, and exploitation are behaviours which are expressly prohibited in our Organisation. These are identified as a form of harassment based on the misuse of power in human relationships and can be defined as behaviours intended to disturb, threaten or upset. Some examples of behaviours associated with these elements are listed in Appendix 1. Any complaints or reports received from communities or stakeholders in this regard will be investigated by our Social Specialist in accordance with the Project's Grievance Redress Mechanism.

15. Protection of children (including prohibitions against abuse, defilement, or otherwise unacceptable behavior with children, limiting interactions with children, and ensuring their safety in project areas)

The rights of the child shall be protected and any observed or reported cases of infringement will be swiftly investigated and required measures taken if deemed necessary. Our Social Specialist will collaborate with the Ministry of Youth Development and Empowerment, Youth at Risk, Seniors Security and Dominicans with Disabilities; Social Welfare Division in this regard.

The Contractor ESHS Expert should provide training related to the environmental and social aspects of the Contract, including on health and safety matters, sexual exploitation and abuse and sexual harassment

Our ESHS Experts will provide short training sessions and concise information leaflets to assist personnel in being informed of the environmental, social and health and safety aspects of the project.

16. Avoidance of conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favours, are not provided to any person with whom there is a financial, family, or personal connection)

Our Company shall deal fairly and lawfully with all our Clients in accordance with our Business Ethics. We expect our employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties. Employees are encouraged to perform self-checks when in doubt or faced with a difficult situation to ensure that decisions are lawful.

17. Avoidance of issues associated with influx of labour, both social and environmental

These issues include many of those identified in this Code, such as sexual exploitation, sexual harassment or gender-based violence. Both our Environmental Specialist and Social Specialist will conduct the requisite monitoring to ensure that these issues are avoided. If any issue should arise or complaint receive, it will be investigated, and the necessary action taken. A report will also be prepared and follow-up done.

18. Protection and proper use of property (for example, to prohibit theft, carelessness or waste)

In accordance with our Organisation's Code each employee must ensure that their actions comply with and are within the meaning and intent of all applicable laws and regulations.

19. Duty to report violations of this Code

Each employee has a duty to report any violations or suspected violations of the code. The person by virtue of this Code will be protected from retaliation. Any reports of violations received will be investigated.

20. Non-retaliation against workers who report violations of the Code, if that report is made in good faith.

Our Organisation is committed to the highest standards of good governance, transparency, honesty, integrity, and accountability. Any of our employees who report unethical conduct or violation of the Code are protected from reprisal. Any reprisal or attempted reprisal against an employee who makes a report in accordance with the Code is considered to be in breach of the Code of Business Conduct. If any employee should feel that they have been discriminated against as a result of reporting unethical conduct or violation of the Code, there is an opportunity to report the discriminatory actions directly to the Company's Director.

Our Personnel are not allowed to smoke illegal substances (drugs) or make open fire in the Project area, including project's vehicles.

Our Personnel are not allowed to carry firearms, explosives, ammunition, or other arms in the Project Area, including Project's vehicles.

Our personnel are not allowed to have pets in the Project area.

Our personnel are not allowed to fish, hunt or remove vegetation from the Project area or surrounding properties.

Our Personnel are not allowed to use open areas instead of the designated sanitary facilities.

Any damage caused by the Project to any property in the Project Area must be immediately informed to the Representative of the Contractor in the Project.

### **Implementation of the Code of Conduct**

The project requires that implementation of the Code of Conduct detail the measures to ensure that there is compliance, these include how the Code will be:

- Communicated to Personnel
- Introduced into the Conditions of Contract
- Violations will be addressed
- Monitored and Reported for Compliance
- Communicated to Communities in case of concerns

Our ESHS Experts on this project will work in close collaboration with the Project's Environmental Safeguards Specialist and Social Safeguards Specialist to ensure compliance with the Code of Conduct during works.

### ***Communication to Personnel***

All employees must be open to communication with their colleagues, supervisors or team members. We promote freedom of expression and open communication, but we expect all employees to follow our Code of Conduct. The Code of Conduct for the project will be provided to each personnel on the project and will also be available in hard copy in the project office.

Our ESHS Specialists will provide short training sessions and concise information leaflets to assist personnel in being informed of the environmental, social and health and safety aspects of the project. Training for workers will include awareness of hazards in the project area, health and safety procedures, emergency response, first-aid, incident reporting and accident prevention. Safety and other ESHS issues will also be highlighted at tool-box meetings and monthly project meetings by the Project Manager, Resident Engineer and/or ESHS Specialists. ESHS orientation will also be done for new personnel.

Personnel will have an open communication channel through our ESHS Experts or other designated person to be able to ask questions and make recommendations at any time during the project implementation.

## ***Engagement Conditions and Consequences of Code Violations***

All our personnel on the Project are personally responsible for ensuring that their behaviour complies with this Code of Conduct. The Code of Conduct is clearly articulated in this document and is written in plain language (English). As part of the conditions of engagement, each employee on this project is expected to sign an agreement indicating that they have:

- Received a copy of the code
- Had the code explained to them
- Acknowledged that adherence to this Code of Conduct is a condition of employment; and
- Understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities

Clarifying queries and obtaining advice – Our personnel may consult with our Compliance Officer if there are any questions or concerns about this Code of Conduct, or if advice is needed. Our Environmental Specialist and Social Specialist on this project will also be available to provide guidance on the Code. We will take appropriate investigative action where this Code is breached. Our Organisation may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our Code of Conduct. Disciplinary actions will vary depending on the violation. Possible consequences include:

- Reprimand
- Demotion
- Suspension or termination for more serious offenses
- Detraction of benefits for a definite or indefinite period
- Legal action may also be taken

## ***Monitoring and Reporting***

If any person observes behaviour that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter name of the Consultant's Social Safeguard's Expert and Environmental Safeguard's Expert or another individual designated by the Company to handle these matters*] in writing at this address [*insert address* ] or by email [*insert email address*] or by telephone at [*insert telephone #* ] or in person at [*insert designated location and available times*]
2. Call [*insert telephone #*] to reach the Project's hotline (*if any*) and leave a message including contact number and brief information of issue
3. Utilise the Project's Grievance Redress Mechanism (GRM), available via telephone [*insert #*], in person at the PCU Office [*insert address*], through the project website [*insert web address*] or via the GRM App [*insert link, if available*]

The person's identity will be kept confidential, unless reporting of the allegation is mandated by law of the Commonwealth Of Dominica. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action in collaboration with the Project. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behaviour prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

**Responsibility** - Overall responsibility for monitoring and reporting lies with our Project Manager/ Site Supervisor, Resident Engineer and Social Specialist and Environmental Specialist or another designated representative on this project. Periodic assessments will be done by these designated personnel to ensure compliance with the Code of Conduct. Review will also be done at least every six (6) months or as may be necessary to ensure the Code remains current.

Reports will be done monthly as part of the project's progress reporting or immediately if there is an incident. Other reports may be prepared as requested by the Project .

### **Communication to Communities**

In collaboration with the Project's Social Safeguards Specialist and Environmental Safeguards Specialists we will if required:

- Inform the community of our roles and responsibilities on the project
- Inform the community and stakeholders of the requirements of the Code of Conduct, measures for compliance and our commitment to upholding the Code
- Respond to the concerns and views of stakeholders in a timely and open fashion
- Engage interested parties, when necessary, to discuss our operations and the relationship to affected communities and the environment
- Provide clear and candid environmental information about the operations of the Project and our responsibilities.

### **Behaviours Constituting Sexual Exploitation and Abuse and Behaviors Constituting Sexual Harassment**

*The following non-exhaustive list is intended to illustrate types of prohibited behaviours:*

**Examples of Sexual Exploitation and Abuse** include, but are not limited to:

- Consultant's Personnel tells a member of the community that he/she can get them jobs on the project work site (e.g. cleaning, masonry) in exchange for sex or sexual acts

- Consultant's Personnel says that he can give priority for job considerations to women in exchange for sex
- Consultant's Personnel rapes, or otherwise sexually assaults a member of the community or project stakeholder
- Consultant's Personnel denies a person access to the site unless he/she performs a sexual favor
- Consultant's Personnel tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her

**Examples of Sexual Harassment or Sexual Misconduct** include, but are not limited to:

- Consultant's Personnel comments on the appearance of another personnel's or community member (either positive or negative) and sexual desirability
- When a Consultant's Personnel complains about comments made by another Consultant's/ Contractor's Personnel on his/her appearance, the other Consultant's/ Contractor's Personnel comment that he/she is "asking for it" because of how he/she dresses
- Unwelcome touching of a Consultant's/ Contractor's or Employer's Personnel or community member by another Consultant's/ Contractor's Personnel
- Consultant's Personnel tells another Consultant's/ Contractor's Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.

FOR CONTRACTOR'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [enter name of Contractor's contact person(s) with relevant experience (including for sexual exploitation, abuse and harassment cases) in handling those types of cases] requesting an explanation.

Name of Contractor's Personnel: *[insert name]*

Signature: \_\_\_\_\_

Date (day/month/year/): \_\_\_\_\_

Counter signature of authorized representative of the Contractor:

Signature: \_\_\_\_\_

Date (day/month/year/): \_\_\_\_\_