

Emergency Agricultural Livelihoods and Climate Resilience Project

Contingency Emergency Response Component (CERC)

Crisis Response Window (CRW)

Environmental and Social Management Plan (ESMP)

For the

Installation and Operation of Dominica's Feed Mill



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1. Background

The onset of the global pandemic and the war in Ukraine have directly triggered increased food insecurity around the world with Dominica not being excluded. Food insecurity has now been made more pressing by the war in Ukraine and its direct effect on major global food staples such as wheat. Rising food prices will affect the consumption expenditure of households, particularly those at the lower income deciles. Shocks to international food prices as one of the most important drivers of poverty as households at the bottom of the income distribution spend a significant percentage of their income on food consumption. To support the emergency response, \$8 million is requested from the CRW ERF. It is proposed that these funds be channelled through the activation of the Contingency Emergency Response Component (CERC) available to Dominica under the Emergency Agriculture Livelihoods and Climate Resilience Project. One of the key activities under the CERC would include, the procurement, installation and operation of a feed mill. The aim of this intervention is to reduce the high cost of imported animal feed and having a locally mixed feed more affordable to livestock producers.

1.2 Overview of Proposed Facility

The Agricultural Warehouse, the proposed building for the installation of the feed mill is located in Dominica's second town of Portsmouth in the northwest part of the Island. The Portsmouth Warehouse, which is currently only being used for the storage of building materials for the construction of livestock structures has been targeted as the preferred choice for the installation and operation of the feed mill. The Portsmouth Warehouse is in close proximity to the coast on the western side, to the south is the Port and to the north and west is a residential area. Therefore, the feed mill will be suitably located close to seaport, where raw materials can be easily transported to the feed mill for processing. The Portsmouth Warehouse is a 120ft by 60ft steel frame building and the perimeter made up of primarily block with three large doors and void of any windows. The Portsmouth Agricultural Warehouse is totally enclosed with chain linked fencing and has one main gate to enter the facility. The facility is already connected to the local electricity supply network and water supply from DOWASCO. The site is also equipped with toilet facilities, however there will be the need to expand the toilet area to accommodate separate male, female and disability accessible toilets.

Figure 1. Outside Portsmouth the warehouse



Figure 2. Inside the Portsmouth warehouse

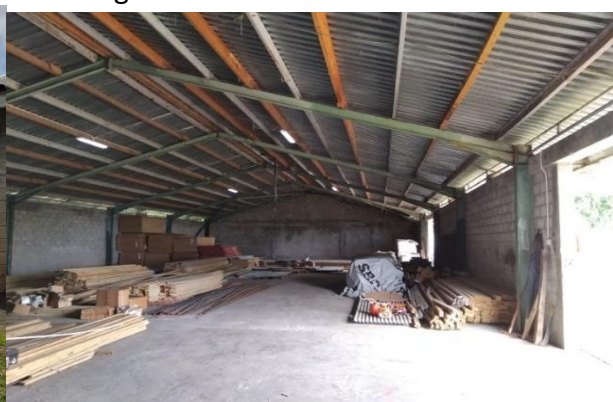


Figure 3. location of Portsmouth Agricultural Warehouse



1.3 Operation of the Feed mill

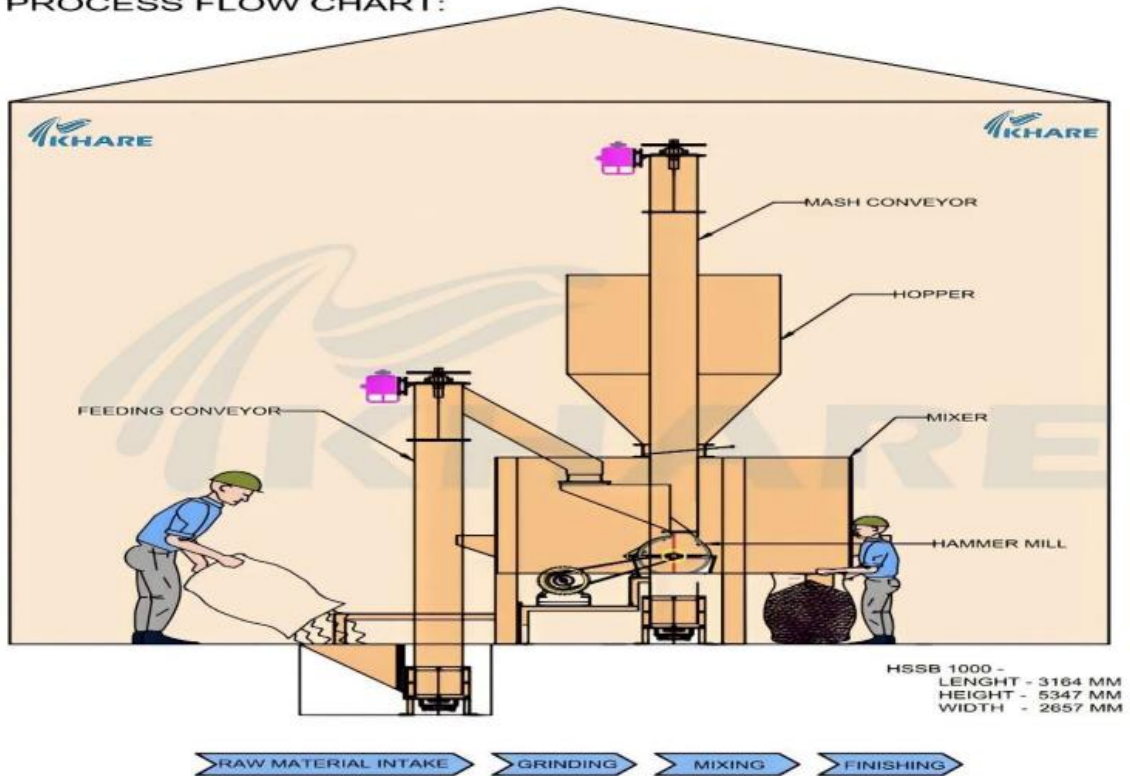
The Mash Feed Plant is designed to process the feed in mash form to make them suitable for livestock, including poultry. This plant contains hammer mill or grinders to grind the ingredients and convert it in the powder form in right proportions for availing homogenous feed.

A storage hopper with a capacity of 1750 liters is available for storing the feed, allowing the feed manufacturing process to continue without any interruptions.

The mixer is used for proper mixing of the feed material. The Plant is designed such that it emits minimum dust, vibration and noise, which will be contained by the Warehouse building structure.

Figure 3. Feed Mill Process Flow

PROCESS FLOW CHART:



1.4 Components of the Feed mill



1. Screw Conveyor (Feeding & Mash):

The screw conveyors are used for elevating raw materials (grain) from the point where raw material is added to the hammer mill. The screw conveyor is equipped with an augur shaft with augur blade which rotates and moves the raw materials upwards.

2. Hammer Mill:

A number of ingredients (corn, soya) used in making feed for livestock are granular in nature and need to be broken down for further processing. The hammer mill will be used to shred or crush aggregate material into smaller pieces by the repeated blows of little hammers or beaters.



3. The ribbon blender, blends and mixes all the ingredients together. The capacity of the ribbon blender 1000Kg (2200lbs)/ Batch of Feed.

This ribbon blender is equipped with two dump chutes provided at the top, where oils can be added through the oil dosing funnel and medicine in the other chamber for the application of vitamin, antibiotics, coccidiostat etc.

Medicine and Oil Dosing System: -



Fig:- Medicine Hopper



Fig:- Oil Dosing

2. Legal and Administrative Framework

2.1 ESMF and ESMP for the Project

The established Environmental and Social Management Framework (ESMF) 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 mitigated (prevented, reduced or avoided). 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. 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 will be disclosed on the EALCRP website after World Bank's approval, and the records of the disclosure will be documented and recorded. ¹This ESMP for the installation and operation of the feed mill can be accessed at EALCRP website <http://www.piu.agriculture.gov.dm/>.

This ESMP is developed in line with relevant laws and regulations of Dominica and the World Bank Environmental and Social Safeguards and Environmental, Health and Safety Guidelines. A more comprehensive review of Dominica's policy, regulatory and legal framework are described in detail in EALCRP ESMF.

2.2 Relevant National Policies, Laws and Regulations

2.2.1 Water and Sewerage Act (1989)

This Act stipulates that water management is vested in Dominica Water and Sewerage Company (DOWASCO) which includes among its functions water conservation and the preservation and protection of catchment areas. Responsibility for catchment areas is shared with the Forestry and Wildlife Division. These are the regulations which guide DOWASCO, who must be consulted with to ensure that adequate water and sewer capacity is available to accommodate all agriculture needs and activities as envisioned in the project.

2.2.2 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. 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.

2.2.3 Employment Safety Act (No.3 of 1982)

“Employment Safety Act reorganizes the system under which safety and health at work are safeguarded and extends it in such a way that every employee is covered by this protection. In addition, provides for the establishment of consultative and advisory committees, as well as the appointment of safety officers. “

2.2.4 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 conservation and maintenance of the environment in the interest of health must be taken into consideration during operation works at the feed mill.

2.3 Regulatory Institutions and Food Safety Regulations

2.3.1 The Dominica Bureau of Standards (DBOS)

The Dominica Bureau of Standards is the National Standards Body as mandated by the Standards Act No. 4 of 1999. It is a statutory body under the guidance of the Ministry of Trade, Industry, Consumer and Diaspora Affairs and its general administration is guided by a 14-member National Standards Council (NSC) appointed by the Minister. Additionally, many persons can be drawn from government departments and ministries and the private sector to serve voluntarily on the Standards Technical Committees and Working Groups to assist with the National standardization effort. The Dominica Bureau of Standards develops, establishes, maintains and promotes standards for improving industrial development,

industrial efficiency, promoting the health and safety of consumers as well as protecting the environment, food and food products, the quality of life for the citizenry and the facilitation of trade.

2.3.1.1 Hazard Analysis of Critical Control Points (HACCP)

Hazard Analysis Critical Control Points (HACCP) is a system which provides the framework for monitoring the total food system, from harvesting to consumption, to reduce the risk of foodborne illness. The system is designed to identify and control potential problems before occurrence. The use of suitable, safe and good quality feed and feed ingredients is of paramount importance to livestock production. Safe feed is an essential element to reduce and prevent food safety hazards entering the food chain. The presence in feed of food safety hazards that can lead to public health problems should be prevented or minimised. Good Agricultural Practices (GAP), Good Manufacturing Practices (GMP) and, Hazard Analysis and Critical Control Point (HACCP) are important instruments to control hazards in the feed production process.

2.3.2 World Bank Environmental and Social Safeguards Policies

The WBG has developed Safeguard Policies that guide the development of projects including the EALCRP. Accordingly, this ESMP was prepared for this project. World Bank Environmental and Social Policies triggered by the installation and operation of the feed mill includes OP 4.01, requiring the preparation of an Environmental Assessment (EA) and Environmental and Social Management Plan (ESMP). These safeguards identify, evaluate and manage the environment and social risks and impacts of the project in a manner consistent with the Operational and Bank Policies by adopting mitigation hierarchy approach to: (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigate; and (d) where significant residual impacts remain, compensate for or offset them, where technically and financially feasible.

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 reconstruction of existing buildings or construction of new facilities. For more information refer to the EHS Guidelines on the WB website.¹

3. Risk and Impacts during Installation Phase

Installation of the feed mill includes alignment of all components in sequence from the intake of raw material to grinding, mixing and the bagging of the finished feed product. The risk associated

¹https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

with installation includes: dust and noise pollution, issues with workers health and safety, waste management and traffic management. In addition to the installation of the machinery, there will be the minimal construction works in the warehouse to include windows to allow for natural lighting and increase ventilation, installing clear roof sheeting to increase vertical lighting of the feed mill, and rainwater harvesting to be used for flushing toilets in times of water shortages, in addition to the creation of office space, kitchenette within the warehouse and the expansion of the existing restroom area which is located outside the warehouse.

3.1 Noise and dust pollution

The most common pollutant involved in fugitive emissions is dust or particulate matter (PM). This is released during certain operations, such as transporting machinery, open storage of solid materials and from unpaved surfaces. During installation activities, noise and vibration may be caused by motorized equipment or power tools such as drills. Small crane and forklift will also be used in hoisting the different components of the feed mill further contributing to noise. Noise from the feed plant will not significantly affect the neighbours during installation as this is minimal and temporary. Trucks transporting the plant machinery will also create noise both during idling and moving around. Excessive noise above dB of 85 can affect hearing. Dust can have an impact on workers suffering from respiratory ailments.

3.2 Workers Health and Safety

During installation workers may experience physical injury, slip, slide or fall. Contractor will be required to follow adequate occupational health and safety procedures during installation and provide workers with the appropriate Personal Protective Equipment (PPE). All electrical connections must be done by a certified Electrician to reduce the risk of getting shock at testing of the feed mill.

3.3 Solid Waste management

Waste associated with the installation includes scrap concrete, wood or metal/screws. Installation waste must be removed and disposed of daily so as not to cause injury to Installation workers.

3.4 Sewage Management

The management of human wastes on site is also critical for maintaining a healthy working environment and reducing the risk of faecal contamination. There is a single toilet on site which will be used during the installation of the feed mill.

3.5 Traffic management

The warehouse, the proposed site for the feed mill is located off the main road and traffic congestion is not expected. However, truckers delivering plant equipment will need to exercise caution. On days when the machinery is being transported the risk of traffic congestion or disturbance will be kept at minimal by installing traffic signs cautioning motorists and pedestrians alike traveling along the main road and access road intersections

4. Risk and Impacts during Operational Phase

4.1 Dust and Noise

Most of the operations in the feed mill primarily the grinding and hammering of raw materials will generate some noise. Dust will be emitted as the raw materials is broken down into marsh feed. Dust pollution can predispose workers with to respiratory ailments especially those suffering from Asthma. Loud noise exceeding 85dB may lead to hearing impairment. Hearing protection (ear muffs/plugs for working around machinery where the noise exceeds 85 dB) will be required.

4.2 Workers Health and Safety

Contractors must provide workers with training in the proper use and maintenance of safety devises (including the proper use of feed mill safety devises) and personal protective equipment (PPE), such as hearing protection, and gloves, etc. to reduce the risk of cuts, amputations, and other accidents with sharp instrument.

Any accidents or near misses during installation or operation must be documented by the Plant Supervisor and reported to the EALCRP PIU, Environmental Specialist or the Ministry responsible. The Supervisor or Safety Officer assigned to the feed mill 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 or the Ministry responsible within 24 hours, where it is investigated as to the cause and provision of preventative measures are put in place to avoid reoccurrence. The matter will then be reported to the World Bank within 2 days (48hrs).

4.3 Energy and water consumption

The warehouse is powered by Dominica Electricity Company (DOMLEC). The energy demand for the feed mill will include water and electricity. The general area of the feed mill will not be equipped with AC units. However, energy efficiency methods will be applied to reduce losses in energy distribution, improve energy conversion efficiency and overall lower the use of carbon fuels. The project will seek to include windows to allow for natural lighting and increase ventilation. Clear roof sheeting will be considered to increase vertical lighting of the feed mill. It will also be recommended that rainwater harvesting be employed to be used for flushing toilets in times of water shortages.

4.4 Waste Management

The contractor shall dispose of material debris and solid waste in accordance with approved procedures of the Dominica Solid Waste Management Corporation (DSWMC). Waste will be sorted out based on either inorganic or organic. Organic waste will be composted and inorganic waste will be picked up during the weekly garbage collection. Sewage waste will enter through the existing sewage system. The project does not foresee the creation of hazardous waste.

However, it is proposed that 3 washroom facilities will be required, one set will contain two female toilets and the second to house two male toilets and the third one with disability

accessible toilets. These restrooms will also be used by the Contractors during the operation of the feed mill.

4.5 Emergency Preparedness and Response

The operator will develop an Emergency Preparedness and Response Plan to address the most common and likely emergency medical and natural disasters' events. Fire extinguisher should be strategically located in the feed mill. A well-stocked first aid kit should be available to treat minor injuries and ailments that may occur. There are three large exit doors for evacuation in case of an emergency. Employees must be trained to address basic first aid, firefighting and evacuation (fires, earthquakes) (see annex 3)

5.1 Mitigation Measures during the Installation Phase

Though the feed mill will create jobs and provide a cheaper source of feed for livestock producers, there are a few risks associated with the installation and operation of the feed mill which needs to be mitigated:

Installation phase		
Aspect	Potential Impacts	Proposed Mitigation
Site Access and Security	Injury to unauthorized person entering the feed mill	<ul style="list-style-type: none"> ○ Barricade installation site with caution tape and close off entrance gate. ○ Place sign indicating no authorized persons allowed. ○ Contractor will implement an OHS management plan (see annex 3)
Air quality, noise and dust control	Dust pollution can predisposed workers to respiratory ailments especially those suffering from Asthma. Loud noise may lead to hearing impairment Poor air quality due to emissions cause from combustion engines and dust generated. Tinnitus and hearing loss is a risk to those in direct exposure to loud noise	<ul style="list-style-type: none"> ○ Contractors must ensure that workers wear appropriate PPEs - Dust masks / respirators when working in the feed mill. ○ Wear hearing protection (ear muffs/plugs for working around machinery where the noise exceeds 85 dB are recommended.

Waste Management	Improper storage and/or disposal of materials Creating land pollution by dispersion of materials.	<ul style="list-style-type: none"> ○ The contractor shall dispose of material debris and solid waste in accordance with approved procedures of Dominica Solid Waste Management Corporation (DSWMC). ○ Construction/installation wastes must be stockpiled away from circulation areas and not pose safety hazards to installation crew. ○ wastes must be stored in containers and removed from the site on a regular basis; containers must not overflow. ○ Collect and segregate wastes based on their classification and ensure disposal approval by the DSWMC. ○ No burning of waste material ○ Ensure appropriate and safe disposal of contaminants such as fuels, construction/installation materials and wastes.
Sewage Management	Improper disposal and treatment of sewage/wastewater can have adverse impacts on human health and the environment	<ul style="list-style-type: none"> ○ Contractors shall use the existing toilet at the warehouse during installation ○ Grey water from regular hand wash, sink use and tools washing will be managed into suitable existing sewage system.
Traffic and road safety	Traffic congestion and accidents unsafe transportation	<ul style="list-style-type: none"> ○ Ensure that contractor employs only competent drivers, with valid driver's licenses. ○ Maintain the free movement of traffic in the warehouse and on access roads. ○ Establish road signage to warn and inform motorist of installation works are ongoing.

		<ul style="list-style-type: none"> ○ Truckers need to exercise caution especially when off-loading equipment ○ Use a banksman when necessary to avoid accidents within site.
Workers Health and Safety	Workers' accidents and ill-health of workers on site	<ul style="list-style-type: none"> ○ Workers must be trained as to how to install and operate the equipment. ○ Contractor must prepare and submit incident reports to the PIU. ○ Train workers on prevention of accidents and managing incidents. ○ Train workers on hygiene and good housekeeping. ○ Workers must wear personal protective equipment (PPE). ○ Provide first aid kit and emergency plan for accidents or incidents. ○ Contractors must also develop a Job Hazard Analysis and convene Daily Safety Talks.
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"> ○ Contractor is required to develop and implement a Code of Conduct reflecting, prevention of gender-based violence and sexual exploitation and abuse (Annex 2) ○ The contractor will need to put in place multiple channels for mitigating and registering complaints in a safe and confidential manner. ○ This Code of Conduct must be signed by all the Contractor's workers on the project. ○ Sensitization on the Code of Conduct and the project grievance/complaints mechanism must also be outlined to the workers at the induction process.

Labour and working conditions	unfair treatment and discrimination and unequal opportunity of project workers	<ul style="list-style-type: none"> ○ No person under the age of 18 years will be employed or engaged in any project activity. ○ Contractor will enforce Code of Conduct to prevent child labour i.e any person under 18 years, and forced labour, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerned. ○ The Contractor will develop a Grievance Redress Mechanism, so that workers can file complaints or develop a means where employees concerns are addressed.
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5.2 Mitigation Measures during Operation

Aspect	Potential Impacts	Proposed Mitigation
Site Access and Security	Injury to unauthorized person entering the feed mill	<ul style="list-style-type: none"> ○ Close off entrance gate. ○ Place sign indicating no authorised persons allowed. ○ Contractor will implement an OHS management plan
Air quality, noise and dust control	<p>Dust pollution can predispose workers with to respiratory ailments especially those suffering from asthma.</p> <p>Loud noise may lead to hearing impairment</p> <p>Poor air quality due to emissions cause from combustion engines and dust generated.</p> <p>Tinnitus and hearing loss is a risk to those in</p>	<ul style="list-style-type: none"> ○ Contractors must ensure that workers wear appropriate PPEs - Dust masks / respirators when working in the feed mill. ○ Hearing protection (ear muffs/plugs for working around machinery where the noise exceeds 85 dB are recommended. ○ Use of dust control methods, air extraction and treatment through a baghouse or cyclone for material handling sources, such as conveyors and bins.

	direct exposure to noise	
Waste Management	Improper storage and/or disposal of materials Creating land pollution by dispersion of materials.	<ul style="list-style-type: none"> ○ The contractor shall dispose of material debris and solid waste in accordance with approved procedures of Dominica Solid Waste Management Corporation (DSWMC). ○ Construction wastes must be stockpiled away from circulation areas and not pose safety hazards to installation crew. ○ wastes must be stored in containers and removed from the site on a regular basis; containers must not overflow. ○ Collect and segregate wastes based on their classification and ensure disposal by the DSWMC. ○ No burning of waste material ○ Ensure appropriate and safe disposal of contaminants such as fuels, construction/installation materials and wastes.
Sewage Management	Improper disposal and treatment of sewage/wastewater can have adverse impacts on human health and the environment	<ul style="list-style-type: none"> ○ Employees will use the toilet at the warehouse ○ Grey water from hand wash and construction tools washing will be managed into existing sewage system.
Traffic and road safety	Traffic congestion and accidents unsafe transportation	<ul style="list-style-type: none"> ○ Ensure that contractor employs only competent drivers, with valid driver's licenses. ○ Maintain the free movement of traffic in the warehouse and on access roads. ○ Establish road signage to warn and inform motorist that

		<p>installation, construction and operation works are ongoing.</p> <ul style="list-style-type: none"> ○ Installing traffic signs cautioning motorist that are traveling in and around the Facility. ○ Truckers need to exercise caution ○ Use a banksman when necessary to avoid accidents within site and along the public road
Workers Health and Safety	Workers' accidents and ill-health of workers on the construction site	<ul style="list-style-type: none"> ○ Contractor must prepare and submit incident reports to the PIU for any accidents that are encountered during installation. ○ Train workers on prevention of accidents and managing incidents. ○ Train workers on installation of the feed mill. ○ Workers must wear personal protective equipment (PPE when the need arises ○ Contractors must also develop a Job Hazard Analysis and convene Daily Safety Talks.
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"> ○ Sensitization on the Code of Conduct must be carried out with workers at induction to the project. ○ 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 (The contractor will need to put in place multiple channels for mitigating and registering complaints in a safe and confidential manner). ○ The Contractor must ensure the Code of Conduct must be signed by all the Contractor's workers on the project.

Labour and working conditions	unfair treatment and discrimination and unequal opportunity of project workers	<ul style="list-style-type: none"> ○ No person under the age of 18 years will be employed or engaged in any project activity. ○ Contractor will enforce Code of Conduct to prevent child labour i.e any person under 18 years, and forced labour, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerned. ○ The Contractor will develop a Grievance Redress Mechanism, so that workers can file complaints or develop a means where employees concerns are addressed.
Emergency Preparedness and Response	Accidental fire Accidental Spill (solvents) Injury to feed mill workers Natural disasters (severe weather, hurricane, earthquake, flooding, etc.)	<ul style="list-style-type: none"> ○ Develop an Emergency Preparedness and Response Plan to address the most common and likely emergency medical and fire. ○ Fire extinguishers should be strategically located in the feed mill ○ A well stock first aid kit should be available to treat minor injuries and ailments occurring at the feed mill. ○ Develop training plan to address firefighting and evacuation (earthquakes, hurricane and flooding ○ Emergency exits should be unobstructed at all times. ○ Exits should be clearly marked (or luminated) to be visible in total darkness.
Occupational Health and Safety	Worker/employee accidents/injury on property, or ill health of staff	<ul style="list-style-type: none"> ○ Wear appropriate protective clothing, such as a long-sleeved shirt, long pants, hat, gloves, and boots.

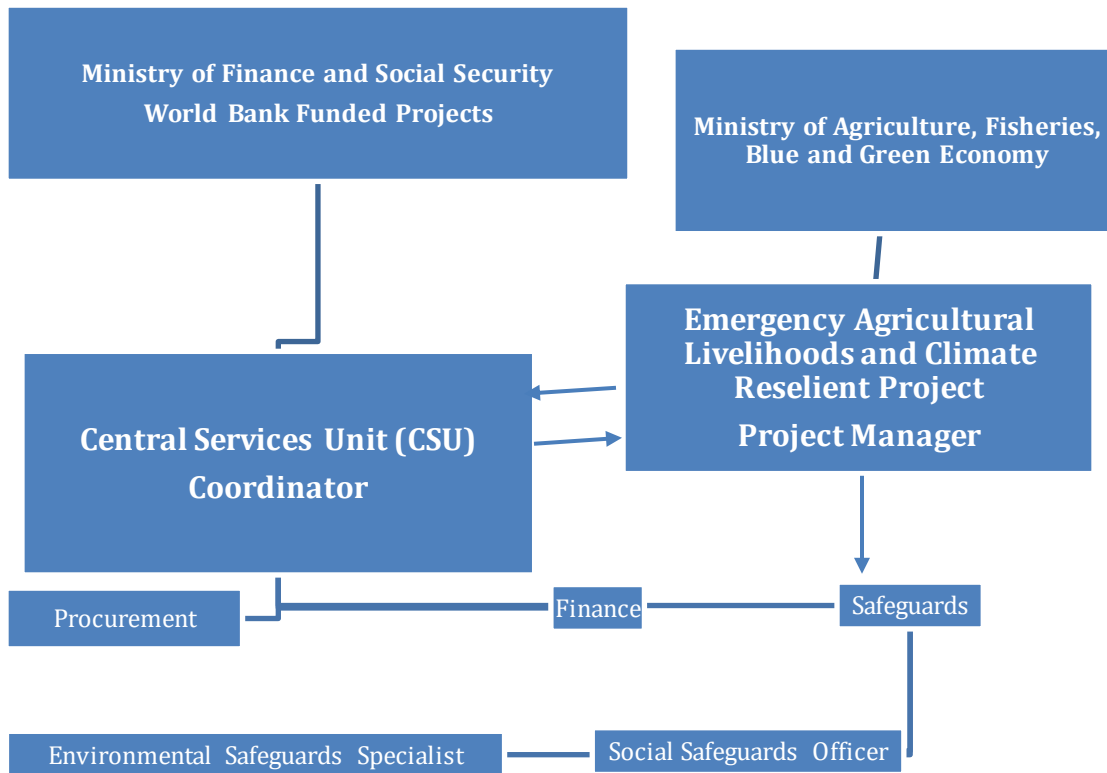
		<ul style="list-style-type: none"> ○ Regularly monitor performance and conduct maintenance of equipment ○ Train staff how to safely perform the activities, use PPE and ensure there is adequate supply ○ Regularly clean offices and high touch areas; ensure cleaning supplies and hand soap are available
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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 through the Central Services Unit. This newly established Unit provides procurement, finance and safeguards functions for all World Bank funded projects in Dominica, including the Emergency Agricultural Livelihood and Climate Resilient Project. The Central Services Unit is manned by a Coordinator who reports to the Financial Secretary within the Ministry of Finance. The figure below provides an overview of the organizational structure that will support and implement the installation and operation of the Feed Mill.

ORGANISATIONAL CHART FOR THE CENTRAL SERVICES UNIT



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 Agriculture, Fisheries, Blue and Green Economy on the coordination of efforts with other partners, and for technical coordination of activities financed under the project. The CSU Environmental Specialists and Social Safeguards Officer 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.

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.

It is the responsibility of the CSU 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 visits as required throughout the installation phase.

The PIU Project Engineer is the technical person for monitoring installation and ensuring that specifications are met and provides regular site inspection. In addition, the PIU Project Engineer will be required to prepare and submit reports (monthly) to the EALCRP PIU Project Manager. These reports provide update on installation on works to include; overall project timeline completion status, bottlenecks and action items.

During the installation phase, primary environmental and social monitoring will be carried out by the Contractor.

The Environmental Safeguards Specialist must monitor mitigation measures as outlined in this ESMP. Environmental and Social Safeguards Specialist will report to the Bank on a quarterly basis as to the progress of installation. Though regular updates may be provided before a quarter report is due.

6.3 Environmental Compliance/ Monitoring Budget

The project estimates a total of 10,000USD for the monitoring of mitigation measures outline in this ESMP. This budget will be allocated towards training of workers on Occupational Health and Safety, Emergency Response Preparation including drills; disposal of waste generated during installation; signage and personnel associated with road and traffic safety and monitoring compliance of mitigation during installation and operation to include transportation, data analysis etc.

Chapter 7. Stakeholder Engagement

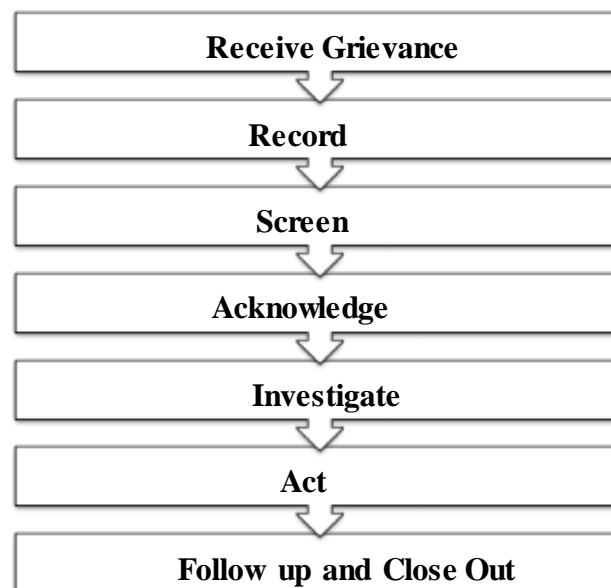
7.1 Consultations

Livestock Staff within the different agricultural districts informed their livestock producers on receiving a feed mixing plant. Livestock producers are looking forward to a reduced cost of readily available livestock feed. The Livestock Development Unit will also look into using local grown raw materials that can also be used as livestock feed.

7.2 Central Services Unit (CSU) GRM

The CSU has prepared a project-wide Grievance Redress Mechanism (GRM) to receive and facilitate the resolution of concerns and grievances associated with the Emergency Agricultural Livelihood and Climate Resilient Project and related activities to include the installation and operation of the Feed Mill. 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 CSU 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 CSU 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 CSU Safeguards Team that is attached to the EALCRP 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

- Environmental and Social Safeguards Specialist, Michael McIntyre Email: mcintyrem@dominica.gov.dm
 - Social Safeguards Officer, Kamarsha Sylvester email: sylvesterk@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 CSU Safeguards Team 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 CSU Safeguards Team 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 CSU is committed to resolving complainant's grievance and as required will convene an independent Grievance Committee to resolve the grievance.

The CSU 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 Workers sexual exploitation, sexual abuse and sexual harassment

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. The Contractor should also include in the code of conduct (annex 2) measures to address sexual exploitation and abuse and sexual harassment incidents that may occur.

Grievances associated with the installation of the Feed Mill, including those related to SEA/SH will be addressed by the CSU Social Safeguards Officer. The GRM will enable the CSU 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.

7.4 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
- **BY EMAIL** at 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

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, dust and noise pollution.

On July 25, 2024 a site visit was conducted at the Portsmouth Agricultural Warehouse, to identify the risk associated with the installation and eventual operation of a feed mil. The Portsmouth Warehouse has sufficient space to accommodate the machinery of the feed mill and the environment is suitable. Risk identified were low and negligible potential environmental and social in nature and may not require the development of an environmental and social management plan (ESMP) as with a major construction project. Therefore, this environmental and social screening (ESS) was developed to mitigate the risk associated with the installation and operation of the Feed mil. (see Annex 1)

Section A: Background information

Subproject Name	Contingency Emergency Response Component
Subproject Purpose	<input type="checkbox"/> New Structure <input checked="" type="checkbox"/> Retrofitting to accommodate Feed mil <input type="checkbox"/> Expansion of existing structure <input type="checkbox"/> Construction of waste disposal system
Subproject Location	Portsmouth Warehouse
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"/> Commercial <input type="checkbox"/> Administrative Office <input checked="" type="checkbox"/> Industrial <input type="checkbox"/> Residential
Subproject Component	Installation and Operation of a feed mil
Estimated Investment	
Expected Start/Completion Date	September 2024 to December 2024

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 generates emissions to the atmosphere (dust, odours, fumes)?	X	

Construction work causes a noise nuisance due to the operation of heavy machinery and other on-site activities?	X	
Construction work produces significant amounts of runoff, changes drainage patterns and/or erosion?		X
Construction work affects 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? NB: If the answer is yes, the sub-project should prepare a Natural Habitats Plan (see ESMP).		X
Adversely affect environmentally sensitive areas or critical habitats – wetlands, woodlots, natural forests, rivers, protected areas including national parks, reserves or local sanctuaries, etc.)? NB: If the answer is yes, the sub-project should not proceed.		X
Affect the indigenous biodiversity (flora and fauna)? NB: If the answer is yes, the sub-project should not proceed.		X
Cause any loss or degradation of any natural habitats, either directly (through project works) or indirectly? NB: If the answer is yes, the sub-project should not proceed.		X
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
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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 from the focus?		X
Require chemical application to be done by vulnerable groups (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

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"> • If all the above answers are 'No', there is no need for further action;
There is at least one 'Yes'	<ul style="list-style-type: none"> • If there is at least one 'Yes', please describe your recommended course of action (see below).

(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.

Based on the potential environmental and social risk identified during the screening above, this ESMP was developed to mitigate the risks associated with the installation and operation of the Feed mill.

Annex 2. Sample Code of Conduct

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

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
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
4. Compliance with environmental requirements identified in the ESS including sewage waste management, traffic control, noise and dust pollution, and the disposal of construction wastes
5. Compliance with COVID-19 or other communicable diseases, Prevention Protocols of the Ministry of Health, Wellness and New Health Investment and other national guidance and related protocols
6. Compliance with applicable emergency operating procedures and health and safety requirements
7. Duty to report work situations suspected to be not safe or healthy and remove oneself from a work situation which is reasonably believed to presents an imminent danger to 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 sanitized. 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). Any complaints received from communities or stakeholders will be investigated in accordance with the Project's Grievance Redress Mechanism (see Annex 2).
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) is strictly prohibited
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) expressly prohibited.
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) are expressly prohibited in our Organisation
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)
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)
17. Avoidance of issues associated with influx of labour, both social and environmental
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.

Annex 3. Emergency Preparedness, Response and Recovery Plan (EPRP)

1.0 Introduction

The Emergency Preparedness and Response Plan (EPRP) for The Feed Mill provides a general guide for identifying, preventing, minimizing and managing injuries, accidents and risks to Workers. The Emergency Preparedness Response Plan (EPRP) is a living document that will be reviewed and should be updated as needed at least once a year.

EPRP OBJECTIVES

The objectives of this EPRP include the following;

- Ensure that potential emergencies that may impact the health and safety of workers are identified and handled effectively.
- Ensure continuous communication, awareness creation and understanding of actions to be undertaken by workers in emergency situations recognizing age differences, levels of disabilities and other relevant social categories.

RESPONSIBILITY

All Feed Mill workers and staff, consultants, implementing entities, contractors and their sub-contractors as well as all relevant stakeholders are responsible for ensuring good implementation and compliance with this EPRP.

2.0 IDENTIFICATION OF POTENTIAL EMERGENCY AND RESPONSE MEASURES

An emergency is an unforeseen situation that threatens employees, the public, disrupts or shuts down operations, or causes physical or environmental damage. Prompt action is required to control and correct the occurrence as well as return operations to safer condition.

The following risks have been identified as key in respect to Feed mill operations :

- Medical Emergencies
- Fire and Evacuation Emergency
- Electric Shocks/Electrocution

2.1 MEDICAL EMERGENCY

Medical emergency that may arise from the feed mill include: Injuries due to events such as structural collapse, fire, explosion, electrocution, trips, slips and falls, manual handling etc. In an event of a medical condition, the following should be adhered to: stay calm, call the Portsmouth Fire and Ambulance Service as soon as possible and explain the type of emergency, the location, condition, and number of victims. Do not move the victim unless there is danger of further injury. If necessary the trained worker should apply first-aid or cardiopulmonary resuscitation (CPR) or medical care based on the injury. Do not leave the injured person except to summon help. Comfort the victim until emergency (medical) services team arrives.

2.2 Fire Safety & Evacuation

Fire in the workplace may be caused by: faulty electrics at the workplace; frequent power outages could lead to burning of feed mill equipment and fire outbreaks; flammable or combustible materials; human error such as knocking liquid onto electrical equipment, spilling flammable or combustible liquid; general negligence and system overload.

The Fire Emergency Plan will include: fire evacuation routes; emergency or fire assembly point; fire alarm location; firefighting equipment location; fire alarm system When in doubt or fire does not extinguish, evacuate building immediately. Fire extinguishers must be inspected regularly by the Portsmouth Fire Service. A dry chemical powder extinguisher shall be used for fires involving flammable and combustible liquids, gases, energized electrical equipment, paper and wood. Water can be used to extinguish wood and paper fires. Carbon dioxide extinguisher for fires involving energized electrical equipment.

2.2.1 Fire Prevention and Means of Egress

Employees will switch off electrical equipment when not in use, particularly at the close of work. Waste materials and office feed scraps should be managed in a way to minimize fire risk and other risks. The feed mill shall be a smoke free zone. Building exits routes will be clearly marked with directional signs. All exit areas will be clear of obstructions of any kind to allow unimpeded escape routes. Fire exit doors should not be locked. Workers will be able to evacuate building quickly and easily without any obstruction.

2.2.2 Fire Emergency Procedures

On finding a fire, emergency personnel must immediately raise the alarm. This should be done by means of the nearest break glass call point. Rescue any Worker in immediate danger provided it is safe to do so. When Fire alarm is alerted, evacuate premises immediately by the shortest route and make your way to the designated assembly point. Escape routes and assembly point shall be indicated in the feed mill office. Contain the fire by closing doors and windows provided it is safe to do so. Extinguish fire, only if you are trained. Emergency personnel should lead employees to the designated assembly point and assist those who need help to exit and must ensure fire doors in the area are closed. At the assembly point Emergency personnel must look

out for individuals missing by conducting roll call. Ensure daily diaries, visitor's book and fire log book are available and supervisors are responsible for the safety of all visitors .

2.3 Electric Shocks/Electrocution

In the event a Worker of the feed mill is electrocuted, the following steps must be taken when such an incident is encountered.

2.3.1 Establish a safe area and contact the first aid attendant/emergency personnel of the feed mill. Rushing in to save someone might be your first impulse, but if the danger of electrical shock remains you will only injure yourself as well. Take a moment to assess the scene and look for any obvious dangers and secure the area to prevent further injuries to other persons. Check for the source of the electrical shock. Look to see if the victim is still in contact with the source. Remember that electricity can flow through the victim and into you. Never use water, even if there is a fire, as water can conduct electricity. Never enter an area where electrical equipment is used if the floor is wet.

2.3.2 Shut off the electric current If you can do so safely, turn off the electrical current. Don't attempt to rescue someone near a high-voltage line. Shutting off the current at the power box, the circuit breaker or the fuse box is the preferred option. Follow these steps to turn the power off with a circuit breaker box:

Open the circuit breaker box. Look for a rectangular block, with a handle, at the top of the fuse box. Grab the handle and flip it to the other side, just like a light switch. Try turning on a light or other electrical device to double check the power is off.

2.3.3 Call emergency services; It is very important that you call as quickly as possible for help. The sooner you call, the sooner help will arrive. Explain your situation as calmly and clearly as you can when you make the call. Explain that the emergency involves an electrical shock so the responders can be best prepared. Speak clearly. Emergency services will need accurate and clear information. Speaking too quickly might lead to misunderstanding, which can waste valuable time.

2.3.4 Separate the victim from the source. Don't touch the victim, even with a non-conducting instrument, if the electricity hasn't been shut off. Once you're sure there is no current, use a rubber or wooden stick, or any other non-conducting tool, to separate the victim from the source. Examples of nonconducting materials include wood, glass, porcelain, plastic and paper. Cardboard is another common, non-conducting material that you may use.

2.4.5 Record Incident into the accident/incident form. Obtain and record relevant information relating to the electric shock incident. You must provide the name and other detail information

of the person to the rescue service or medical facility, the nature of injury and documented detail of the shock.

Annex 4. Occupational Health and Safety Plan

Occupational Health and Safety is the promotion and maintenance of the highest degree of physical, mental and social well-being of all workers, the prevention of adverse effects on health caused by the working conditions and the protection of workers from health risk at the feed mill. Safe work procedures are an excellent tool as long as they are actually put to use and not ignored. All employees must be familiar with the procedures so they can do their jobs as safely as possible. Doing their jobs safely starts with employees being trained and oriented, an important component of the health and safety Plan. The plan consist of training and orientation of employees, this will help everyone in the feed mill to help reduce injuries. The major hazards associated with the feed mill includes; mechanical, physical, chemical and ergonomic.

Mechanical Hazards

Mechanical hazards may be triggered by the machinery of the feed mill; aisles; floorings, platforms; ladders and other means of access and poor housekeeping. The risk associated with mechanical hazards includes cuts, wound, loss of fingers, hands, etc. bruises, sprains, fractures and, in extreme cases, death.

Physical hazards

Physical hazards represent potential for accident or injury or illness due to repetitive exposure to mechanical action or work activity. Single exposure to physical hazards may result in a wide range of injuries, from minor and medical aid only, to disabling, catastrophic or fatal. Multiple exposures over prolonged periods can result in disabling injuries of comparable significance and consequence.

Physical hazards from the feed mill included vibration and noise especially from the hammer mill. Workers may be impacted by temporary and permanent hearing loss, vibration disease (eg VWF) electric shock and death. There are several rotating and moving equipment in the feed mill which may cause injury or death if one gets entrapped, entangled, or struck by machinery parts due to unexpected starting of equipment or unobvious movement during operations. Machine or equipment that has an exposed moving part or exposed pinch point that may endanger the safety of the worker, the machine or equipment should be equipped with, and protected by, a guard or other device that prevents access to the moving part or pinch point. Guards should be designed and installed in conformance with appropriate machine safety standards. Turning off, disconnecting, isolating, and de-energizing (Locked Out and Tagged Out) machinery with exposed or guarded moving parts, or in which energy can be stored (e.g. compressed air, electrical components) during servicing or maintenance.

Noise

Employee should not be exposed to a noise level greater than 85 dB(A) for a duration of more than 8 hours per day without hearing protection. Hearing protective devices provided should be capable of reducing sound levels at the ear to at least 85 dB(A).

Electrical

Panels, cables, cords and hand tools, can pose a serious risk to workers. Overhead wires can be struck by metal devices, such as poles or ladders, and by forklift with metal extensions moving within the feed mill.

All energized electrical devices and lines must be marked with warning signs. During service or maintenance locking out (de-charging and leaving open with a controlled locking device) and tagging-out (warning sign placed on the lock).

Chemical

The risk associated with chemicals at the feed mill is low to negligible as only oil will be used in the feed mixing process. The machinery of the feed mill is powered electrically and no fuel is used.

Ergonomic Hazards Sources:

Ergonomic issues of the feed mill may be caused by badly designed machinery, mechanical devices and tools; workstation design and repetitive motions. The effects of such workplace hazards are fatigue; repetitive strain injuries (RSI) and musculoskeletal disorders (MSD); and lower back problems.

Standing all day on concrete floors causes ergonomic hazards fatigue and therefore the workers must be provided with matting. Injuries due to ergonomic factors, such as repetitive motion, overexertion, and manual handling, take prolonged and repeated exposures to develop, and typically require periods of weeks to months for recovery. These OHS problems should be minimized or eliminated to maintain a productive workplace.

To mitigate against the feed mill design and installation has to be done with the Workers well-being in mind. When loading raw materials into the feed mill a mechanical assists should be used to eliminate or reduce exertions required to lift materials. If possible adjustable work stations should be provided and incorporate job rotation, rest and stretch breaks into work processes.

Annex 5. Addressing Sexual Exploitation And Abuse And Sexual Harassment (Sea/Sh)

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

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

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

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

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

Sexual harassment (SH)

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

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

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

Survivor-centered approach

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

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

SEA/SH grievances can be received through any of the available channels and will be considered level 3 grievances investigated and addressed by the GRC. A list of SEA/SH service providers will

be kept available by the Project. Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centered approach⁷. Any cases of SEA/SH brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The WB will be notified as soon as the Project Manager and the E&S specialist learn about the complaint.

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

ACTION 1: COMPLAINT INTAKE AND REFERRAL

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

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

If the survivor does not want to provide written consent, her consent can be verbally received. If needed or desired by the survivor, the PIU E&S Specialist refers her/him to relevant SEA/SH service providers, identified in the mapping of SEA/SH service providers and according to preestablished and confidential referral procedures (See Appendix 4 for Referral Pathway). The survivor's consent must be documented even if it is received verbally. The service providers will be able to direct survivors to other service providers in case the survivor wishes to access other services. The PIU safeguards specialist will keep the survivor informed about any actions taken by the perpetrator employer. If the survivor has been referred to the relevant SEA/SH service providers, received adequate assistance, and no longer requires support; and if appropriate actions have been taken against the perpetrator or if the survivor does not wish to submit an official grievance with the employer, the PIU Safeguards Specialist can close the case.

ACTION 2: INCIDENT REPORTING

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

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

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

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

ACTION 3: GRIEVANCE VERIFICATION AND INVESTIGATION

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

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to a project²⁸, the verification committee discusses appropriate actions to be recommended to the appropriate party—i.e., the employer of the perpetrator, which could be the PIU or a contractor. The PIU will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with local labor legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

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

If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in the St. Lucian legal system, the PIU Safeguards Specialist should provide linkages to the relevant institutions. Ensuring due legal process is up to the police and the

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

courts, not the SEA/SH verification committee. Unlike other types of issues, the PIU E&S Specialist does not conduct investigations, make any announcements, or judge the veracity of an allegation.

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

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

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

