

# **Environmental and Social Management Plan (ESMP)**

## **Rehabilitation of the Pig Structures In Dominica**

**Emergency Agricultural Livelihoods and Climate Resilience Project**

**Sub component A.2, Restoration of Livestock and Fisheries Systems**

**Preliminary Draft**

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## Chapter 1. Introduction and Background

### 1.1 EALCRP Project Overview and Objectives

After the passage of Hurricane Maria on September 18, 2017, The Government of the Commonwealth of Dominica (GoCD) with funding from the World Bank Group commence with the 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.

This sub-component A2, aims to help in restoring livelihoods of livestock farmers through the construction of resilient livestock buildings destroyed or damaged by Hurricane Maria. Resilient shelter will be constructed for small ruminants (sheep and goats), rabbits, pigs, bees and poultry.

### 1.2 The Livestock sub-component

All Livestock Producers affected by Hurricane Maria that satisfy qualifying criteria are eligible for support under this component. Livestock farmers are expected to express their interest followed by the completion of an application package. The information is verified by the Livestock Extension Officer to confirm that the farmer actually suffered lost as a result of Hurricane Maria. Farmers are required to provide a Certificate of title if they own the land or permission to construct livestock structures from the landowner if they are leasing the land. Livestock beneficiaries are expected to provide a counterpart contribution of at least 50% of the total Investment cost which can include a combination of the following:

- i. Livestock building to include a foundation.
- ii. Storeroom used for storage of feed, eggs and other livestock supplies
- iii. Waste management (septic systems)
- iv. Wire cages & PVC support structure and fencing wire
- v. Equipment (waterers, feeders, nipples)
- vi. PVC fittings and plumbing supplies
- vii. Rainwater harvesting system (guttering, down spout, water tank)
- viii. Protective gears, smoker and harvesting tools

The project will match the farmers contribution by providing support up to 50% of the total Investment cost through the renovation of livestock structures. Based on the farmers contribution there are two options:

1. The farmer can accept his contribution as 80% in materials and 20% goes toward labour, in this option there will be an Agreement between the Project and Livestock Beneficiary. This 20% labour cost is paid directly to the Beneficiary chosen Contractor, based on requirements set by the Engineer.

2. The project can also finance a full works contract for complete renovation, where a 100% of the Beneficiary value will go towards materials (55%) and for the contractor (45%). A Contract will be signed between the Project and the Contractor. This option provides the Beneficiary with a smaller structure.

Verifications have been conducted by Assessors or Project Engineer to confirm the farmer`s 50% contribution towards their investment. The construction process will be supervised by the Project Engineer. Disbursement of materials will be done on successful completion of each construction phase as documented in the beneficiary agreement.

### 1.3 Livestock Structures Status

There are seven (7) agricultural regions, which have been divided into four construction zones to capitalize on monitoring, proximity, geographical location of Contractors and size and number of Beneficiaries per zone:

- Zone 1: The Northeast Region
- Zone 2: South and Central Agricultural Region
- Zone 3: West and North Agricultural Region
- Zone 4: Southeast and East Region

There are approximately, 205 livestock farmers pre-approved to receive assistance for livestock construction. There are some livestock producers who are pending either: environmental health documents or/and land title or lease agreement before finalizing their approval. Most of the livestock producers have more than one livestock structure requiring either renovation, expansion or new building.

To date construction of livestock structures has not started and all activities towards this end is geared for the Northeast Region (Zone 1), comprising of 42 Beneficiaries to receive approximately; 21 small ruminant structures, 9 poultry pen, 2 rabbit structures and 10 pig pens.

Though, the Beneficiaries for the other Zones have been pre-approved those wanting option 1 to accept the project assigned Contractor for completion of all renovation works versus option 2 for those wanting building material (80%) and (20%) towards labour for the Beneficiaries chosen Contractor has not yet been finalized.

#### 1.4 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 eliminated or mitigated. The Environmental and Social Management Plan (ESMP) is one of the safeguards instruments used to address the environmental and social risks of projects, and as a result this ESMP has been prepared. This ESMP identifies environmental, social, health and safety risks, 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 number of structures (> 200) to be renovated or built, the environmental and social screening checklist will be used to determine environmental and social risk and impact of the project. The general risk associated with construction were considered and mitigation measures to address these risks were outlined. Similarly, the operational risk associated with livestock production were identified and mitigation measures were outlined to address such. Annex 1 indicates a general screening checklist for each livestock category and not site specific. Site specific situations will be addressed on a case-by-case basis using the said screening checklist, for example if the pig structure is located next to a water course, a forested area, or a third-party house, etc.

This ESMP has been prepared to provide guidance on the laws of Dominica, World Bank safeguards policies, project ESMF<sup>1</sup> the implementing ministries, authorities, agencies and contractors to ensure that the rehabilitation of livestock structures is compliant. Specifically, it will ensure the protection of workers and the farming community from environmental and social risks associated with the project related activities, such as traffic management, waste management, health and safety, and providing timely and clear public information.

This ESMP will be disclosed at the project sites and on the EALCRP PIU website at <http://piu.agriculture.gov.dm/safeguards>, January 2022, and consultations or feedback will be documented and recorded.

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<sup>1</sup> The Environmental and Social Management Framework (ESMF) for the EALCRP in Dominica can be found at: [dominica\\_EALCRP\\_ESMF.pdf \(agriculture.gov.dm\)](http://dominica_EALCRP_ESMF.pdf)

## Chapter 2. Project Description

### 2.1 Pig Pen Details

The pig structures will be resilient and built to withstand hurricanes to avoid or reduce the livestock farmers livelihood. Pig structures will vary in size and design due to the farmers contribution and the existing structures. Pig pens will be built using normal construction materials to include blocks, sand, aggregate, cement, treated lumber, zinc sheeting, steel, nails and hurricane proof fasteners (ties, screws etc.). The pig pens will be designed to facilitate housing animals and different stages of production (gestation, lactation, finishing and breeding). The perimeter of the pen will be concreted to allow for ease of drainage of roof and storm water. Both the inside and outside walls will be plastered for ease of cleaning and avoid the build-up of parasites and germs. The pigs will be watered using half inch PVC pipe through the walls leading to the water nipples where the pigs can drink freshwater. The flooring will be concreted with a slight slope to allow for easy drainage of urine and waste during cleaning. Figures 1-3 show the design and layout for the proposed pig structures.

Photo # 1: Roof repairs to be done



Photo # 2: Replace doors





Figure 1: Pig Structure Elevation

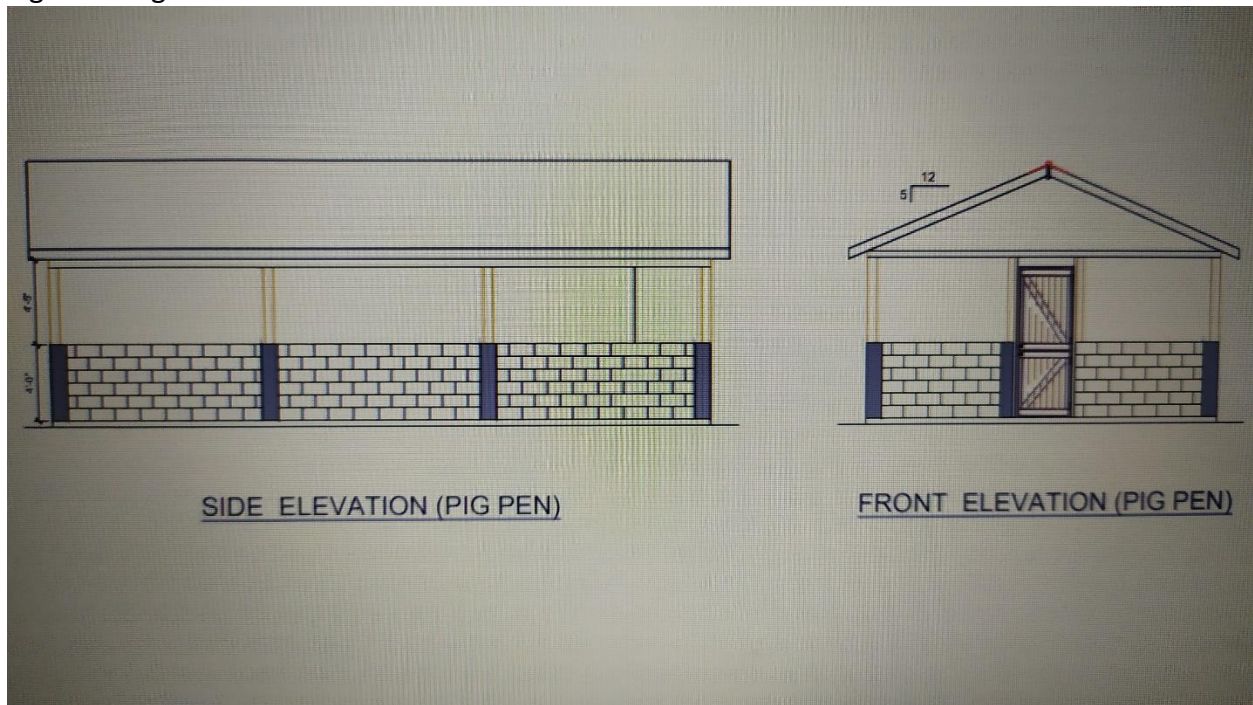
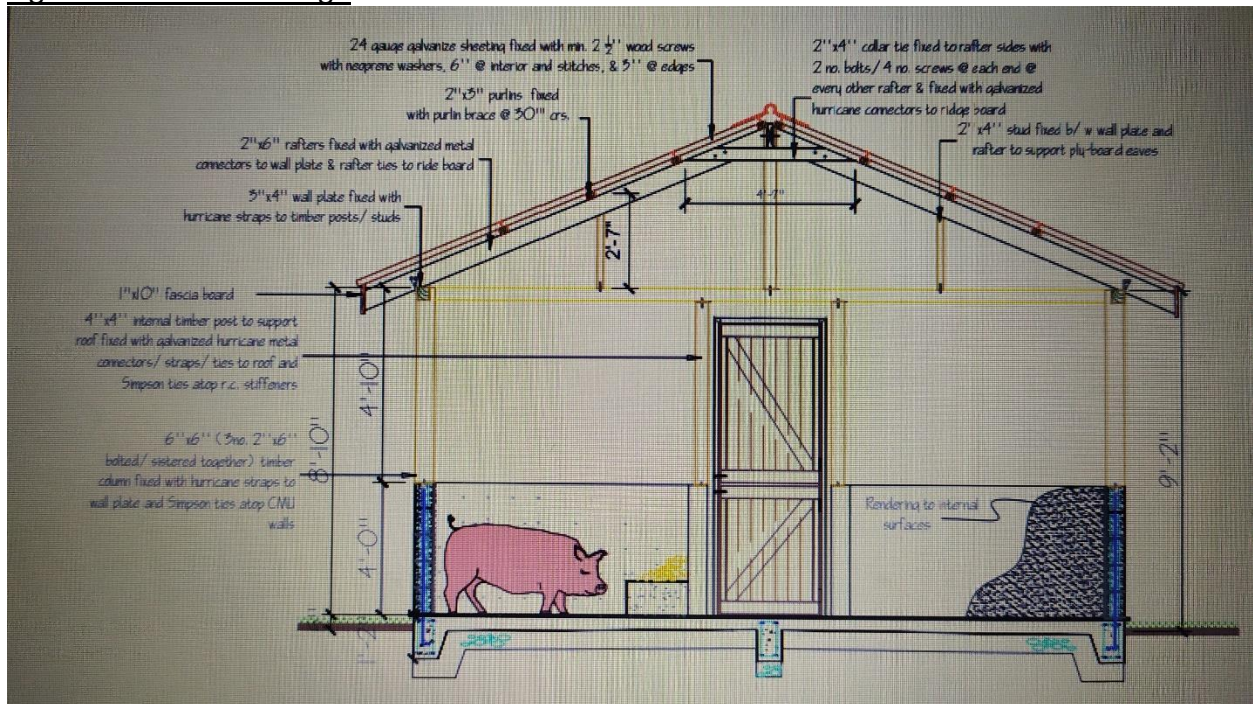


Figure 2: Structural Design







decomposition are carbon and nitrogen. Carbon provides an energy source and the building material representing 50% of the microbial cell biomass. The bulk of the material used will be pig manure, which is high in nitrogen. During the composting, the C:N ratio gradually decreases from 30:1 to 10–15:1 at the final product, because two thirds of the carbon of the organic compounds consumed by the microorganisms is converted to carbon dioxide. Therefore, it's important that the farmer provide a carbon source such as dry branches and leaves to maintain the C/N ration and increase the rate of decomposition.

The temperature of the compost pile is aided by mesophilic microorganisms, which rapidly break down the biodegradable compounds. The heat generated by these bacteria causes an increase of compost temperature. When the temperature reaches 40 °C, these mesophilic microorganisms become less competitive and are replaced by the thermophilic bacteria. At temperature above 55 °C, most human and plant pathogens are destroyed. At 60 °C seeds of weeds and parasites are destroyed. The temperature of the compost pile must not exceed 65 °C because many useful microbes will be killed, resulting in a decrease of the rate of decomposition. The pH of the compost is also an important factor and should be between 5.5 and 8.5 for optimal functioning of microorganisms. If the compost is not being turned regularly it becomes anaerobic and the acid accumulation can lower the pH to 4.5, thus limiting the microbial activity. Therefore, farmers need to do weekly turning of the compost pile to increase aeration, increase microbial activity and reduce the temperature of the compost.

The percentage of moisture in pig manure is 75 to 80%, which is above the optimal humidity of 50–60% for composting. When more than 65% water is added to the compost anaerobic conditions set in. If the compost has moisture below 40%, this will reduce the biological activity of the compost (Keener et al., 2000). Therefore, farmers need to incorporate organic matter with low moisture content to buffer the high amount of moisture in pig manure. Farmers must also note that during the composting process the moisture decreases naturally, and it may be necessary to add water to increase the humidity. Composting takes 3 to 6 months based on the environmental conditions discussed above. During the daily cleaning of the pen the pig waste is removed to form compost, the remaining residues are washed away as liquid waste into the septic tank. Source: (Keener et al., 2000).

### 2.2.2 Soak-away and septic tank system

The design of the septic and soak-away system applied used the same design that the Environmental Health Department uses for domestic purposes. An adult pig generates 10lbs of waste daily in comparison to ¼ lb from humans. However, the size of the septic system used for pigs is much larger with a capacity of 1000 gallons. During the cleaning process of the pig pen the waste is scooped up and placed in the compost shed. The remaining waste is washed out of the pen via three-inch (3" PVC) waste pipes into the septic tank. The septic tank (Figure 4) comprises of two chambers; the sludge chamber which is the entry point of the waste from the pig pen, where bacteria begin to break down the waste and the small amounts of solids are settled to the bottom of the chamber. The effluent chamber is where primarily all sewage water is collected before overflowing into the soak away. The soak-away is a pit with dimension 4ftL \* 4ftW \* 6ftD filled with stone that allows for water filtration into the soil.



Figure 4: Septic System

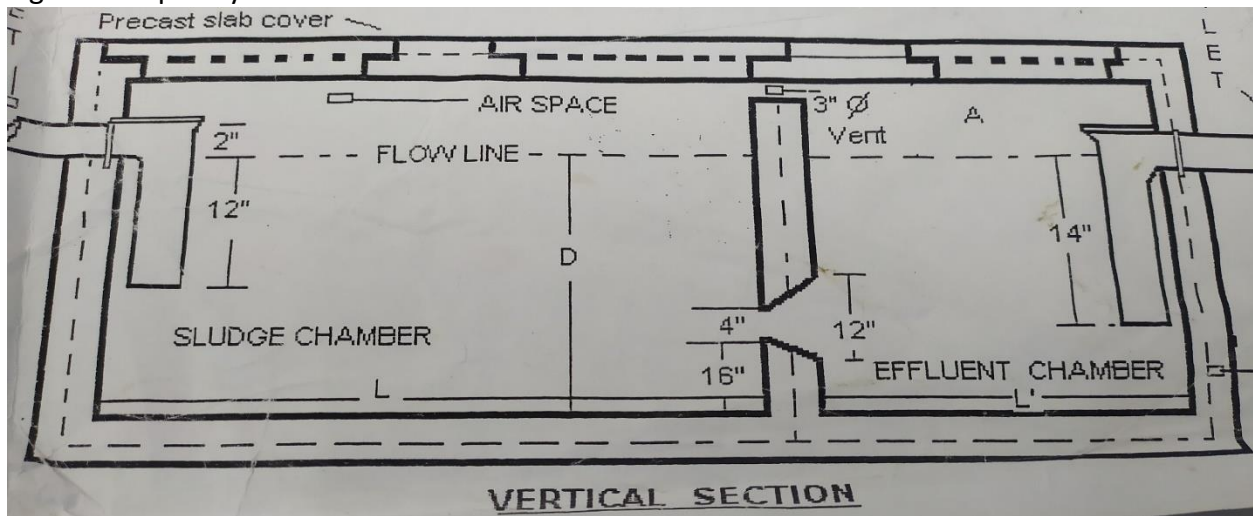


Photo # 3: Waste disposal system to be replace with the above design (Figure 4)



## Chapter 3. The Legal and Administrative Framework

This ESMP is developed in line with relevant laws and regulations of Dominica and the World Bank Environmental and Social Standards (ESS) and Environmental, Health and Safety Guidelines. A more comprehensive review of the policy, regulatory and legal framework in Dominica is described within the general ESMF for the Emergency Agricultural Livelihoods and Climate Resilience. The current ESMP deals with those most relevant to the proposed rehabilitation such as covid-19 guidelines, waste management, Environmental Health Act physical planning, etc.

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

#### 3.1.1 Ministry of Health COVID 19 Guidelines

The outbreak and spread of COVID-19, people have been advised, or may be mandated by national or local law, to exercise social distancing, and specifically 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 project activities, PIU personnel, beneficiaries and contractors.

EALCRP PIU personnel must utilize physical distancing, practice personal hygiene, and wear face masks, in addition to the designated personal protective equipment (PPE) to minimize the spread of the virus and safeguard themselves and project beneficiaries. COVID 19 protective measures will also be applied to all consultations and stakeholder engagements. Contractors will be required to prepare and submit a detailed COVID plan to EALCRP PIU demonstrating their ability to safeguard health and safety of workers/employees while on site. The COVID Plan should include, but not be limited to (refer to Annex 2 for complete guidance):

- Site access control and traffic management
- Checking of body temperature, physical distancing, personal hygiene
- Disinfection of premises, offices, workspaces and equipment
- Train all staff in the signs and symptoms of COVID-19
- Communicating health and safety matters relating to COVID-19, including wearing of personal protective equipment (PPE) - Wear gloves, glasses and masks, etc.
- COVID incident notification, including the need to immediately report to the Bank if (a) an outbreak occurs in the project offices or worksites, or (b) the infection rate in the project office or worksite is higher than the average.

### 3.1.2 Physical Planning Act (2002)

The Physical Planning Act (2002) provides inter alia for the orderly and progressive development of land and for the grant of permissions 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. Further, 'Unless the Authority otherwise determines, environmental impact assessment shall be required in respect of any application for development permission to which the Second Schedule.

### 3.1.3 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.

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

The Pesticides Control Act provides for the control of the importation, sale, storage and the use of pesticides. Pesticides Control Board was created 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 effect the provisions of the act. Subsidiary legislation includes the Pesticides Control (Labelling of Pesticides) Regulations and the Pesticides Control (Registration and Licensing) Regulations.

### 3.1.5 Environmental Health Services Act 1997

This Act 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 Environmental Health Department is the executing office of this Act and provide the permitting of renovation activities on livestock structure. Permitting by the Environmental Health Department involves inspection of each site in relation to proximity to neighbours, churches, schools or other public buildings, method of waste disposal, distance from waterways, and other sensitive areas. The This Department also provides guidelines on maintaining sanitation of the structure and their environment and health and safety of livestock.

### 3.1.6 Water and Sewerage Act (1989)

The water management authority is vested in DOWASO 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.

### 3.1.7 Water and Sewerage (Catchment Area) Regulations (1995)

These rules were made under section 5 of the Act. The rules prohibit certain acts in water catchment areas including washing equipment used for applying pesticides and containers which contain or have contained pesticides in any river or stream in the area. Of note is the requirement that there must be no direct discharge of household or industrial waste, sewerage or sludge into any stream or river.

## 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, 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<sup>2</sup>.

### 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 rehabilitation of existing buildings or construction of new facilities. Some parts of these general guidelines are applicable to the project, particularly such aspects as livestock waste management, 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>2</sup> <https://www.worldbank.org/en/projects-operations/environmental-and-social-policies>

<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 principal environmental and social impacts expected to occur during the renovation of livestock structures would be mainly those associated with typical construction works. Notwithstanding the numerous positive benefits, the Livestock Farmer expects to gain from this capital investment, the following negative environmental and social impacts have been identified for the different phases of construction:

Mitigation measures for each of the risks identified 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 of construction workers, and neighbouring property owners and communities (See Annex 2).

### 4.1 Pre-Construction and Construction Phase

Construction of structures will be based on the degree of repairs required either renovation of an existing structure, expansion or a new structure.

Construction activities may pose significant hazards related to the stockpiling and removal of construction debris, fugitive dust formation from raw materials, noise from equipment, improper use of tools and equipment by construction workers, disposal of construction debris and waste materials. Potential fall of materials or tools, as well as ejection of solid particles from abrasive or other types of power tools which can result in injury to the head, eyes, and extremities.

Specific risks associated with demolition include:

#### 4.1.1 Site Access and Security

The majority of the sites for construction will be on the farmer's property, and therefore access will be limited to the construction crew and farmer's family. No unauthorized access is allowed, and the general public must keep out. The entrance and exit of personnel, trucks or vehicles carrying supplies will require access controls and security clearance.

#### 4.1.2 Noise and dust control

During construction and decommissioning activities, noise and vibration may be caused by the operation of pile drivers, earth moving and concrete mixers. Recommended noise reduction and control strategies to consider in areas close to farm houses. Noise from motorized equipment or power tools can be a nuisance to sensitive livestock (poultry), neighbours and family residing in close proximity. Demolition of structure and stockpiles of construction materials (cement and sand) can trigger fugitive dust formation resulting in respiratory illness of workers.

#### 4.1.3 Debris and solid waste management

The mishandling of construction wastes such as pieces of blocks, lumber, metal (zinc scraps, nails etc) building materials, can lead to pollution of soils, and the entry of these substances into surface water bodies, either through runoff, via drains, or by being blown by the wind, can damage the fragile ecosystems. Demolition waste and other types of construction debris or



materials will be categorized according to composition, source, types of wastes produced, regularity and quantities generated. All waste materials from demolition works will be separated and disposed of at a disposal site approved by the Dominica Solid Waste Management Corporation (DSWMC).

The management of human wastes on site is also critical for maintaining a healthy working environment and reducing the risk of faecal contamination. 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. In cases where portable units are not available, construction workers will utilize farm toilets (Section 5 Mitigation Measures, Sewage/Wastewater Management). The same can be said of food wastes for reducing the incidence of vector entry into an area and infestation.

#### 4.1.4 Traffic management

Construction activities may result in a significant increase in movement of heavy vehicles transporting construction materials and equipment, thereby increasing the risk of traffic-related accidents and injuries to workers and individuals on the farm. 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.

#### 4.1.5 Workers Health and Safety

The minor civil works to be undertaken to facilitate in the rehabilitation of livestock farms will expose contractor and workers to potential health and safety risks. Exposure to health and safety risks will require the contractor to provide personal protection equipment (PPE) to workers, to prevent or reduce the risk of accidents at the work site. Specifically, the contractor will be responsible to provide 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.

A well stock first aid kit equipped with medication and supplies should be to treat basic construction related injuries, must be available to workers.

#### 4.1.6 Community Safety

Communities needs to be protected from physical, chemical, or other hazards associated with the construction activities. Potential risks may arise from inadvertent or intentional trespassing, contact with hazardous materials, contaminated soils and other environmental media, buildings that are vacant or under construction, and structures which may pose falling and entrapment hazards.

#### 4.1.7 COVID -19 Measures

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 (Annex 2 and 3). The COVID 19 Plan will be provided to all employees working on site.

#### 4.1.8 Pest Management

There are numerous livestock structure that are infested with termite and must be treated prior to renovation works. All livestock structure both new structures and existing structures must be treated thoroughly to include removal of the infested lumber. In the treatment of termites' infestation on livestock structure the nesting area of the termites must be removed and treated away from livestock. It is also important to find the nesting area of the termites that may not be attached to the livestock structure and treat. 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 Operation Phase

The potential impacts of livestock production are primarily that of the health and safety to include wastewater from livestock pens, faecal matter, water consumption used for cleaning, safety of farmers (zoonotic diseases) and Covid 19 transmission. The operations of the project will cause additional impact on the immediate environment if not managed properly.

### 4.2.1 Management of livestock waste

Animal waste (manure) generated during livestock production is primarily of organic in nature and mainly consists of nitrogen, phosphorus, and other excreted substances which may result in air emissions of ammonia and other gases and may pose a potential risk of contamination to surface or groundwater resources through leaching and runoff. Animal waste also contains disease-causing agents such as bacteria, pathogens, viruses, and parasites which may also potentially contaminate soil and water. Animal waste generated will be separated to facilitate composting and effluent generated during washdown of pens or holding areas will be diverted to a soak-away and septic tank system to reduce soil and water contamination (Section 2.2.2).

### 4.2.2 Dead animals

Dead livestock should be properly managed and quickly disposed by burying at a depth that will prevent the spread of disease or causing an offensive odour.

### 4.2.3 Livestock Diseases

Livestock disease-causing agents can spread rapidly, especially in intensive livestock operations. Animal diseases can enter a facility with the introduction of new animals, on equipment used among farmers, and on farmers or contractors working on the farm. Diseases can affect both

livestock and humans alike, therefore procedures to protect against the spread of animal diseases must be taken. Workers may be exposed to disease-agents such as bacteria, fungi, mites, and viruses transmitted from live animals, manure, animal carcasses, and parasites and ticks (zoonoses).

#### 4.2.4 Inorganic Waste Disposal

All inorganic livestock waste such as empty medication containers, empty feed bags and damaged or unwanted livestock waterers and feeders are to be disposed of at the DSWMC approved disposal site of landfill. Where possible, empty medication containers and empty feed bags may be reused. All used medical waste (e.g., vaccine vials) will be collected and disposed of in accordance with the Ministry of Health, Wellness and New Health Investment and the Dominica China Friendship Hospital medical waste guidelines and procedures.

#### 4.2.5 Forced Labour

The Project will not allow the use of all forms of forced labour. The Contractor shall have a grievance redress mechanism in place for workers to raise workplace concerns and grievances including forced labour.

#### 4.2.6 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 years or below and forced labour, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerned.

#### 4.2.7 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

#### 4.2.8 Animal Welfare in Livestock Production

Livestock should be raised in a stress-free environment, farmers shall avoid livestock from experiencing the following conditions that may be attributed to stress; the deprivation of water or food, rough handling, mixing of animals reared separately resulting in fighting, is unacceptable from an animal welfare viewpoint and should also be avoided because of its deleterious effects on milk extracted. There are five guiding principles in protecting animal from stress must be adhered to:

- (a) Freedom from hunger and thirst, by ready access to fresh water and a diet to maintain full health and vigor
- (b) Freedom from discomfort, by providing an appropriate environment including shelter and a comfortable resting area.
- (c) Freedom from pain, injury and disease by prevention or rapid diagnosis and treatment
- (d) Freedom to express normal behavior by providing sufficient space, proper facilities and company of their kind
- (e) Freedom from fear and distress, by ensuring conditions and treatment that avoid mental suffering.

#### 4.2.9 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.

## 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 site preparation, demolition, construction of structures and operation of the piggery.

### 5.1 Construction Phase

Aspect	Potential Impacts	Proposed Mitigation
Site preparation activity	<ul style="list-style-type: none"> <li>○ Loss of vegetation</li> <li>○ Poor air quality due to emissions from vehicles and dust generated</li> <li>○ Respiratory impacts on site workers, nearby residents and farm families.</li> <li>○ Noise generation from the use of machines and construction equipment with its impact on workers and neighbourhoods</li> </ul>	<ul style="list-style-type: none"> <li>○ The Contractor shall Establish a perimeter of the site, marked by barrier tape and signage indicating the construction is ongoing and disallowing unauthorized access.</li> <li>○ The Contractor shall sign a 'code of conduct' with all its staff before mobilizing them into construction. The 'code of conduct' will include the responsibilities of the workers in dealing with the affected community (person) waste management and following the instruction from the supervisor</li> <li>○ These are existing farm structures and there is no need for site clearing. Clearing of site will be limited to access road and designated areas for stockpiling construction materials.</li> <li>○ Site clearing activities will be conducted during regular working hours 8 am to 5 pm.</li> <li>○ Dust suppression methods such as wetting materials or slowing work should be employed as needed to avoid visible dust from site preparation</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> <li>○ The location of noisy machinery can be positioned away from sensitive sites such buffer zone or forested areas.</li> <li>○ Maintain vehicles and Contractor's machinery according to maintenance requirements.</li> </ul>

Aspect	Potential Impacts	Proposed Mitigation
Gender Based Violence (GBV) and Sexual Exploitation	<ul style="list-style-type: none"> <li>○</li> </ul>	<ul style="list-style-type: none"> <li>○ Contractor must enforce the Code of Conduct against GBV and SEA/SH that the PIU approves.</li> <li>○ The Contractor shall have a grievance redress mechanism in place to deal with gender-based violence and sexual exploitation cases. In case, the Contractor does not address these concerns, the EALCRP PIU’s Grievance Redress Mechanism (GRM) is active to receive and facilitate the resolution of concerns and grievances associated with gender-based violence and sexual exploitation.</li> <li>○ Any incident should be reported to the EALCRP PIU by the Contractor and the Bank should be informed by the PIU.</li> </ul>
Construction Waste and Debris	<ul style="list-style-type: none"> <li>○ Improper storage and/or disposal of materials</li> <li>○ Dispersion of materials in nearby canals, ditches, rivers, streets and adjacent properties</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 and visitors; wastes must be stored in 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>○ Demolition/construction debris will be used on site as backfilling where possible.</li> <li>○ Collect and segregate wastes based on their classification and ensure disposal by the DSWMC.</li> <li>○ No burning of waste material</li> <li>○ If there are any excavated materials, they shall be bermed and covered to prevent dispersion and sedimentation of drains, creeks, streets and adjacent properties</li> <li>○ Workers 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> </ul>

Aspect	Potential Impacts	Proposed Mitigation
		<ul style="list-style-type: none"> <li>○ Maintain vehicles and Contractor's machinery according to maintenance requirements.</li> <li>○ Demolition activities will be conducted during regular working hours 8 am to 5 pm</li> <li>○ Neighbouring property owners and communities will be informed of works.</li> <li>○ Prevent unauthorized persons access to the Site or to partly demolished structures.</li> <li>○ Ensure immediate cleaning of any spills and remediation of contaminated areas after construction.</li> <li>○ Sprinkle driveway with water on dry days to reduce dust.</li> </ul>
Pesticide application	<ul style="list-style-type: none"> <li>○ The risk of pesticide application may lead to accidental exposure to livestock, inhalation, spillage and entry into the natural ecosystem</li> </ul>	<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> <li>○ Read label and abide by the instructions, to include storage &amp; disposal, direction for use, precautionary statements and first aid.</li> <li>○ Follow the project IPMP.</li> </ul>
Hazardous materials handling, storage, use and transportation	The risk of accidental discharge of hazardous products, leakage of hydrocarbons, oils or grease from construction machinery.	<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 to control spill in case of accidental spillage</li> <li>○ Maintain Material Safety Data Sheets (MSDS) 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> </ul> <p>In cases where portable units are not available, construction workers will utilize farm toilets.</p> <p style="text-align: center;"><b><i>GUIDANCE FOR USING FARM TOILETS</i></b></p> <ul style="list-style-type: none"> <li>- <i>Post handwashing and hand sanitizing signs</i></li> <li>- <i>Hand sanitizer should be made available where possible at the entrance/exit of the washroom</i></li> <li>- <i>Sanitize or wash hands before and after using washroom</i></li> </ul>

Aspect	Potential Impacts	Proposed Mitigation
		<ul style="list-style-type: none"> <li>• <i>Ensure that soap and paper towels are always available and are refilled frequently to ensure workers can practice proper hand hygiene</i></li> <li>• <i>Paper towels should be used to dry hands and dispose of immediately.</i></li> <li>• <i>Clean and cover after use.</i></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, nearby residents and pedestrians</li> <li>○ Noise generation from the use of machines and demolition/construction equipment with its impact on workers and neighbourhoods</li> </ul>	<ul style="list-style-type: none"> <li>○ Dust suppression methods such as wetting materials 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> <li>○ The location of noisy machinery (including generators) can be positioned away from sensitive sites such as schools' and residential areas etc.</li> <li>○ Maintain vehicles and Contractor's machinery according to maintenance requirements.</li> </ul>
Water pollution from site runoff or infiltration of wastes on site for equipment on site	Clogging of ditches or drains with sediment or silt	<ul style="list-style-type: none"> <li>○ Sensitize the workers to appropriately manage construction materials and wastes</li> <li>○ Use berms, silt traps or silt fences, pits or other measures to ensure that any runoff from the site is controlled</li> </ul>
Traffic Management during demolition and construction activities	Traffic congestion and unsafe transportation of construction materials on and off site.	<ul style="list-style-type: none"> <li>○ Ensure that contractor employs safe drivers.</li> <li>○ Contractors must place the appropriate traffic signage, when material and equipment are stored along the roadside</li> <li>○ Avoid transporting materials during wet conditions.</li> <li>○ Maintain the free movement of traffic on project access roads.</li> </ul>
Worker health and safety	Workers accidents on the construction site	<ul style="list-style-type: none"> <li>○ The Contractor shall inform worker they have a grievance redress mechanism to raise workplace concerns, the channels to report grievances, including contacting the EALCRP</li> </ul>



Aspect	Potential Impacts	Proposed Mitigation
		<p>PIU if the Contractor does not address their concerns.</p> <ul style="list-style-type: none"> <li>○ Train workers on prevention of accidents and managing incidents.</li> <li>○ Workers must wear personal protective equipment (PPE).</li> <li>○ Provide first aid kit and emergency plan for accidents or incidents.</li> <li>○ Proper supervision of the construction workforce by Contractor or assigned personnel.</li> <li>○ Contractors must develop and implement Standard Operation Procedures -SOP for the most hazardous activities, such as excavation and trenching, working on heights (ladder or scaffolding), among others.</li> <li>○ Contractors must also develop a Job Hazard Analysis and convene Daily Safety Talks.</li> <li>○ Proper supervision of the construction workforce.</li> <li>○</li> </ul>
Community Health and Safety		<p>The Contractor Shall:</p> <ul style="list-style-type: none"> <li>○ Establish a perimeter of the site, marked by barrier tape and signage indicating the construction is ongoing and disallowing unauthorized access.</li> <li>○ Sign a code of conduct with all its staff before mobilizing them into construction. The code of conduct will include the responsibilities of the workers in dealing with the affected community (person) waste management and following the instruction from the supervisor</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>Annex 2.</b>

5.2 Operation Phase

<b>Aspect</b>	<b>Potential Impacts</b>	<b>Proposed Mitigation</b>
Occupational Health and Safety	<p>Exposure to zoonotic diseases and physical injury to farmer</p> <p>Lack of awareness among workers on the ESHS risks and requirements of the Project</p>	<ul style="list-style-type: none"> <li>○ Minimize and control the movement of farm animals, equipment and other farmers of same livestock specie on the farm</li> <li>○ Avoid wild or domestic animals entering the facility.</li> <li>○ Seal-off holes in buildings to keep out wild animals, as rats and opossum can harm and spread diseases.</li> <li>○ EALCRP PIU will conduct ESHS awareness sessions with Contractor and workers before they start working on site. The awareness sessions will cover primary ESHS risks associated with the proposed construction works and the workers' responsibility.</li> <li>○</li> </ul>
Sewage/Wastewater Management	Improper disposal and treatment of sewage/wastewater	<ul style="list-style-type: none"> <li>○ Convert manure to compost, reducing soil pathogens and weed seeds</li> <li>○ Reduce the amount of water used during cleaning (e.g., by using high-pressure, low-flow nozzles)</li> <li>○ Locate manure stacks away from water bodies and other sensitive habitats.</li> <li>○ Reduce the volume of pig waste entering the septic system by collecting manure and then rinsing pen with water.</li> <li>○ Manure storage facilities should have capacity for 9–12 months of manure production.</li> </ul>
Livestock Production	Sick and unhealthy animals	<ul style="list-style-type: none"> <li>○ Ready access to fresh water and a diet to maintain full health and vigor</li> <li>○ Provide an appropriate environment including shelter and a comfortable resting area to avoid discomfort of animals.</li> <li>○ Prevent pain, injury and disease through rapid diagnosis and treatment</li> <li>○ Provide sufficient space, proper facilities and company of their kind so that animals can express their normal behavior</li> <li>○ Provide treatment and the suitable environment that will reduce fear and distress and avoid mental suffering.</li> </ul>

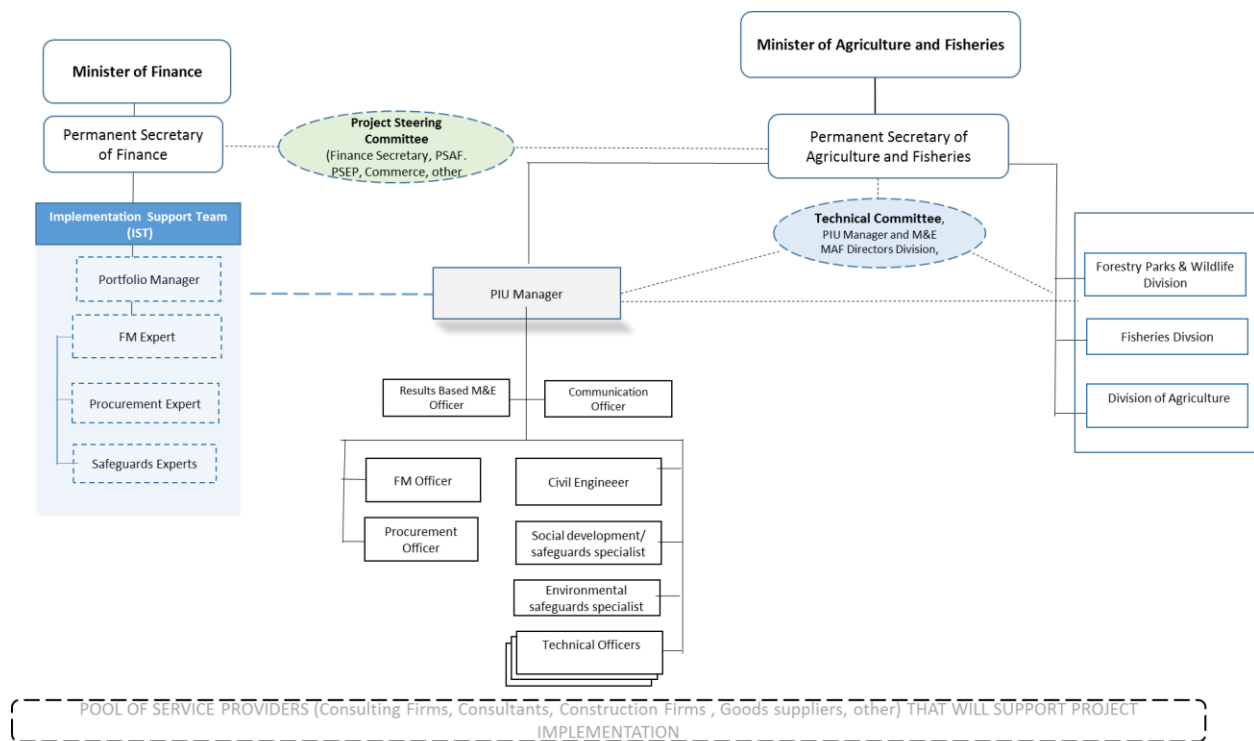
<b>Aspect</b>	<b>Potential Impacts</b>	<b>Proposed Mitigation</b>
Management of carcasses	Spread diseases, attracts vectors and has an offensive odour	<ul style="list-style-type: none"> <li>○ Reduce mortalities through proper animal care and disease prevention;</li> <li>○ On-site burial should be accessible to earthmoving machinery and have stable, low-permeability soils with sufficient physical separation from houses and water resources to avoid contamination by vapors or leachate from buried, decaying animals.</li> <li>○ Carcass must be buried within the farmers land boundary and away from sensitive areas or water source or drainage areas.</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. 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 the ESMP. When required, additional safeguards support will be provided by the Implementation Support Team (IST) in guidance 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 Project PIU. Standard environmental and social related requirements will be included in the bidding documents, including the development of a code of conduct, methods of preventing Gender Based Violence, Grievance Redress Mechanism that workers can use to file complaints, developed forms for monitoring compliance of environmental and social issues of the project and complying other safeguard requirements as stipulated in 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 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 sporadic site visit on a monthly basis. The Project Engineer is the technical person for monitoring that the construction specifications are met and provides regular site inspection. The Project Engineer and the Environmental Specialist are in constant communication to ensure that all safeguard procedures are met.

During the rehabilitation phase, environmental and social monitoring will be carried out by the Contractor and Beneficiary with support from the Environmental Safeguard Specialist. The Project Engineer to provide oversight on technical aspects. The Contractor will be required to prepare and submit reports monthly to the EALCRP PIU Project Manager thru the Project Engineer. These reports provide update on construction works to include overall project timeline completion status, action items, project risk, non-conformities to the environmental and social and health and safety requirements and the proposed mitigation plans.

The monitoring of renovation works on livestock structures has been reinforced by the hiring of 4 Assessors that will provide support to the Project Engineer in both monitoring and supervision of works. The Assessors reports to the Project Engineer whom report on the status of livestock construction.

## Chapter 7. Stakeholder Engagement

### 7.1 Disclosure of ESMP and Community Outreach

Public disclosure allows for the dissemination of relevant information on the project to stakeholders/host communities and to document any concerns/issues from the farming community. Disclosure also improves communication between EALCRP PIU and host communities; document public consultation meetings and events; and disclose selected company documents relevant stakeholders.

This ESMP will be disclosed to the Contractors that are bidding for the renovation works at the DBMC Building, the Contractors therefore has an opportunity to use this ESMP as a guideline for the development of the Management Strategies and Implementation Plan. The ESMP will also be disclose on the EALCRP PIU website at <http://piu.agriculture.gov.dm/safeguards> so that comments from the general public can be incorporated into the final document. The entire disclosure process will take approximately 2 weeks. Comments can be submitted via email to the Environmental and Social Safeguards Specialist, Email: [mcintyrem@domininca.gov.dm](mailto:mcintyrem@domininca.gov.dm). 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.

On July 8<sup>th</sup>, 2021 the EALCRP PIU Team including, the Project Manager, Agricultural Specialist, Project Engineer and Environmental Safeguards Specialist conducted a meeting at the Northeast Regional Office to discuss the procedures for the construction of livestock structure for the livestock beneficiaries. The Project Manager gave an overview of the livestock sub sector of the project and the procedures towards approval. The Agricultural Specialist outline the voucher system for the delivery of materials. The Project Engineer outlined the contractual arrangements either complete works contract or the provision of only materials. The Environmental Safeguards Specialist outline the main risk and impact associated with the construction of livestock structures.

#### **Remarks from stakeholder participants in Zone 1 (NE Region)**

<b>Concerns/Remarks</b>	<b>PIU Response</b>
Will farmers be reimbursed for works done between time of assessment and construction	No reimbursement.
Farmer ask if materials can be exchanged if the value is equivalent (e.g., galvanize for lumber) Farmers suggest photos of work be taken for verification work	Yes. once material will be used for the livestock construction

Farmers suggest that Assessors call at least 24 hrs before visiting farms	In agreement, however sometime they don't get the farmers and they are in that particular region assessing other farmers
Before pouring of concrete steel work and form work must be assess	In Agreement, in case works does not comply to set standards
A farmer mention that they always do their part, but the downfall is always on management.	The lengthy process of procurement which is the primary delaying factor was explained. This subcomponent is delayed but certain.
Some farmers had concern about paying their contractor, most were not aware they were fully responsible for labour	This arrangement was further explained in more detail, that if a farmer gets all their value in materials, they are responsible for paying for labour to construct.
Farmer raised concern about transportation.	Farmers were encouraged to work in groups and those collecting the same material for the same area or in close proximity can do so collectively

The COVID 19 pandemic resulted in the consultation strategy delivery method being changed from face-to-face meetings to limited face-to-face with social distancing and virtual meetings. The Government of Dominica, Ministry of Health, Wellness and New Health Investment's and Ministry of Blue and Green Economy and Agriculture and National Food Security COVID Guidelines and Protocols have been adopted and will be implemented throughout the project's life cycle, where applicable.

The following measures will be used and adopted by the EALCRP PIU for consultations and stakeholder engagement activities, is communicating with them on the work plan for reconstruction, and the basics of mitigation as described in this ESMP. Alert people to the Grievance Redress Mechanism (GRM), presented in section 7.2 below. Make the ESMP publicly available on-line, and in the local Extension Office if people wish to see it.

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. A printed copy of the ESMP will also be available at the following locations:

1. Office of the Project Manager  
Emergency Agricultural Livelihoods and Climate Resilience Project  
19 King George V St., Roseau

## Commonwealth of Dominica

2. Office of the Director of Agriculture  
Botanical Garden Main Office  
Roseau
3. Office of the Chief Veterinary Office  
Livestock Development Unit  
Botanical Gardens  
Roseau
4. Office of the Chief Environmental Health Officer  
133 Bath Road  
Roseau

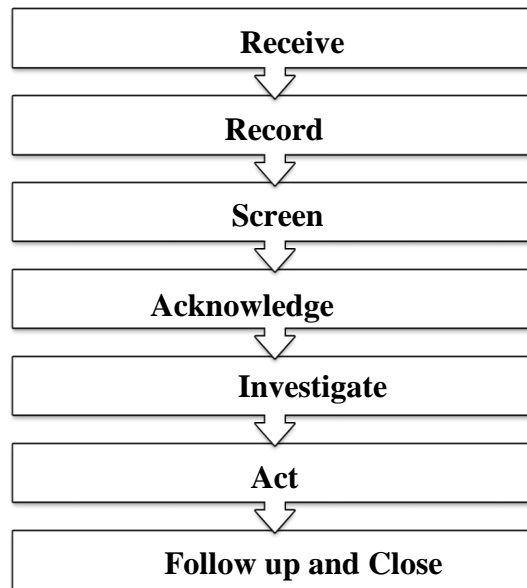
### 7.2 Grievance and Redress Mechanism

#### 7.2.1 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 renovation of livestock structures 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.

#### 7.2.2 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 Livestock and Fisheries System
Subproject Purpose	X <input type="checkbox"/> New Structure X <input type="checkbox"/> Expansion of existing structure X <input type="checkbox"/> Renovation of existing structure X <input type="checkbox"/> Construction of waste disposal system
Subproject Location	Island-Wide -Dominica
Subproject property ownership	<input type="checkbox"/> Government of the Commonwealth of Dominica X <input type="checkbox"/> Own    X <input type="checkbox"/> Lease Agreement
Subproject current property use	<input type="checkbox"/> Industrial <input type="checkbox"/> Commercial X <input type="checkbox"/> Agricultural <input type="checkbox"/> Residential
Subproject Component	Restoration of pig structures
Estimated Investment	
Start/Completion Date	November 2021/November 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

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.

## **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 diarrhoea, 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.

***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 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:

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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.

- 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/Sanitiser** - 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 sanitised 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 labour 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-serviced 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 labour
- 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 behaviours required of them in enforcing such system and any COVID - 19 specific considerations.
- Training staff who will be monitoring entry to the site, providing them with the resources they need to document entry of workers, conducting temperature checks and recording details of any worker that is denied entry.
- Confirming that workers are fit for work before they enter the site or start work. While procedures should already be in place for this, special attention should be paid to workers with underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.
- Checking and recording temperatures of workers and other people entering the site or requiring self-reporting prior to or on entering the site.
- Providing daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.
- During the daily briefings, reminding workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.
- Preventing a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or (if that is not possible) isolating such worker for 14 days.
- Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.

### **(c) GENERAL HYGIENE**

Requirements on general hygiene should be communicated and monitored, to include:

- Training workers and staff on site on the signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular handwashing and social distancing) and what to do if they or other people have symptoms (for further information see [WHO COVID-19 advice for the public](#)).
- 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

### CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

We are the Contractor, [enter name of Contractor]. We have signed a contract with The Ministry of Blue and Green Economy, Agriculture and National Food Security, for Renovation of the Livestock Structures. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation and abuse and sexual harassment. This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, labourer and other employees (permanent or part time/temporary) at the Works Sites or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as "Contractor's Personnel" and are subject to this Code of Conduct. This Code of Conduct identifies the behaviour that we require from all Contractor's Personnel. 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.

### REQUIRED CONDUCT

Contractor's Personnel shall:

1. Carry out his/her duties competently and diligently;
2. Comply with this Code of Conduct, the World Bank Environmental and Social Standards, and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person;
3. Maintain a safe working environment including by:
  - (a) ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
  - (b) wearing required personal protective equipment (PPE);
  - (c) using appropriate measures relating to chemical, physical and biological substances and agents; and
  - (d) following applicable emergency operating procedures.
4. 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 and serious danger to his/her life or health;
5. Treat other people with respect and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. Not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
7. Not engage in Sexual Exploitation, which means any actual or attempted abuse of 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. In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from Bank financed Goods, Works, Consulting or Non-consulting services is used to extract sexual gain;

8. Not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal coercive conditions;
9. Not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. Complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
11. Report violations of this Code of Conduct no later than 48hours from occurrence and record comprehensively in the Project records;
12. Not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Redress Mechanism.

#### RAISING CONCERNS

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 Contractor's Social Expert with relevant experience in handling sexual exploitation, sexual abuse and sexual harassment cases, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters] in writing at this address [ ] or by telephone [ ] or in person at [ ]; or
2. Call [ ] to reach the Contractor's hotline (if any) and leave a message. The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. 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. We will provide warm referrals to service providers that may help support the persons who experience 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.

#### CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

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/): \_\_\_\_\_

Countersignature of authorized representative of the Contractor:

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

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