

# **Emergency Agricultural Livelihoods and Climate Resilience Project**

**Restoration of Key Infrastructure in Agriculture, Fisheries, and Forestry  
in Dominica**

**Environmental and Social Management Plan**

**for the**

**Citrus Certification Facility**

## Revision Record

Revision	Date	Author(s)	Remarks
1.	February 11 <sup>th</sup> 2024	EALCRP PIU	Preliminary Draft
2.	April 14 <sup>th</sup> , 2024	EALCRP PIU/CSU	Draft – Internal Review
3.	July 15 <sup>th</sup> , 2024	World Bank Safeguards Specialist	Draft – World Bank Review
4.	September 17 <sup>th</sup> ,2024	World Bank Safeguards Specialist	Draft – World Bank Clearance
5.			Draft – Disclosure and Consultation

# Table of Contents

Chapter 1. Introduction and Background.....	4
1.1    EALCRP Project Overview and Objectives .....	4
1.2    ESMF and ESMP for the Project .....	4
Chapter 2. Project Description.....	5
2.1    Location and Regional Setting.....	5
2.2    The Citrus Certification Facility Layout.....	7
2.2.1    Office Block.....	7
2.2.2    Potting House .....	8
2.2.3    Laboratory.....	10
2.2.4    Propagation House(s).....	12
Chapter 3. The Legal and Administrative Framework .....	14
3.1    Relevant National Laws and Policies for the project .....	14
3.1.1    Physical Planning Act (2002) .....	14
3.1.2    Environmental Health Services Act 1997 .....	14
3.1.3    Solid Waste Management Act 2002 .....	14
3.1.4    Pesticides Control Act (Cap. 40:10) .....	14
3.2    World Bank Social and Environmental Safeguards.....	15
3.2.1    Safeguard Policies.....	15
3.2.2    EHS Guidelines .....	15
Chapter 4. Potential Environmental and Social Impacts.....	16
4.1    Construction Phase .....	16
4.1.1    Site Access and Security.....	16
4.1.2    Noise, Air Quality and Dust control .....	16
4.1.3    Debris and solid waste management .....	16
4.1.4    Traffic management.....	16
4.1.5    Workers Health and Safety.....	17
4.1.6    Pest Management .....	17
4.1.7    Wastewater and Sewage Management .....	17
4.1.8    Forced Labour .....	18
4.1.9    Child Labour.....	18
4.1.10    Gender Based Violence.....	18

4.1.11 Disability Indusion .....	18
4.2 Operation Phase .....	19
4.2.1 Wastewater.....	19
4.2.2 Waste management.....	19
4.2.3 Energy Conservation .....	19
4.2.4 Water Conservation.....	20
4.2.5 Emergency Response .....	20
4.2.6 Occupational Health and Safety .....	20
Chapter 5. Mitigation Measures .....	21
5.2 Operation Phase.....	26
Chapter 6. Project Management and Institutional Arrangements .....	28
6.1 ESMP Implementation Responsibilities.....	28
6.2 Contractor Responsibilities.....	29
6.3 Supervision, Monitoring and Reporting.....	29
Chapter 7. Stakeholder Engagement.....	30
7.1 Consultations .....	30
7.2 Disclosure.....	30
7.3 Grievance and Redress Mechanism (GRM) .....	31
7.3.1 EALCRP PIU GRM.....	31
7.3.2 Addressing Sexual Exploitation And Abuse And Sexual Harassment (Sea/Sh) .....	32
7.3.3 World Bank Redress Mechanism .....	36
Chapter 8. ANNEXES.....	37
Annex 1: Environmental and Social Screening Checklist .....	37
Annex 2: Sample Code of Conduct .....	42

# 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 commenced with implementing the Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP). The objectives of the Project are to contribute to restoring agricultural livelihoods and enhancing climate resilience of farmers and fisher folks affected by Hurricane Maria in Dominica.

Under component B, the project is designed to deliver a series of infrastructure projects for the Division of Agriculture in the Ministry of Blue and Green Economy, Agriculture and National Food Security, including the construction of the Citrus Certification Facility.

## 1.2 ESMF and ESMP for the Project

The established Environmental and Social Management Framework (ESMF) for the project requires all project related activities, including sub-project activities to be reviewed and assessed to ensure that environmental and social impacts associated with their implementation throughout the project's life cycle are mitigated (prevented, reduced or avoided). The Environmental and Social Management Plan (ESMP) is one of the safeguards instruments used to address the environmental and social impacts and risks of projects, and as a result this ESMP has been prepared. Based on the screening conducted for this project (see Annex 1), an Environmental and Social Management Plan (ESMP) is required to identify and appropriately manage environmental, social, health and safety impacts and risks.

This ESMP has been prepared to provide guidance and mitigation measures to the implementing entities (Local Government Authorities, and contractors/sub-contractors) to ensure that the construction of this citrus certification facility is in compliance with laws of Dominica, consistent with international best practices and the World Bank safeguards policies. This ESMP will also ensure the protection of staff of the citrus certification facility during its operational phase.

This ESMP will also provide guidelines for the protection of contractors from environmental and social impacts and risks associated with the construction activities, such as noise, dust, waste management, health and safety aspect.

This ESMP will be disclosed on the EALCRP website after World Bank's approval, and the records of the disclosure will be documented and recorded. <sup>1</sup>This ESMP for the construction of the Citrus Certification Facility can be accessed at EALCRP website <http://www.piu.agriculture.gov.dm/>.

## Chapter 2. Project Description

### 2.1 Location and Regional Setting

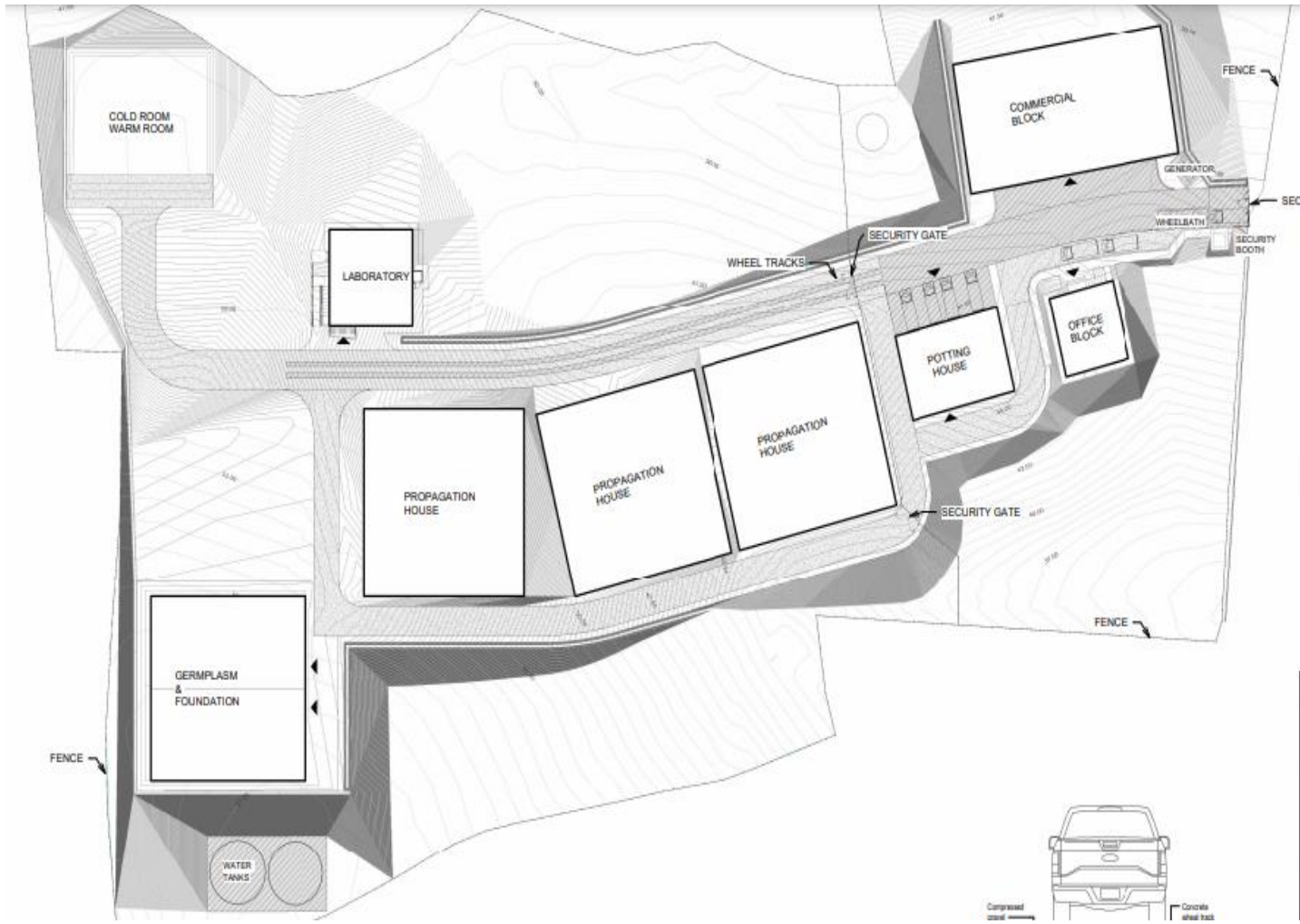
The Citrus Certification Facility is located in the northeast part of the island on 200 acres of state land in Londonderry. This vicinity is the same area that occupies the Central Livestock farm. For this reason, both the Central Livestock Farm Workers and the Staff of the Citrus Certification facility will share the same dwelling building.

The Citrus Certification Facility consist of several buildings to include: 3 propagation houses, commercial block, office block, potting shed and storage block, laboratory, cold and warm room and germ plasm foundation and multiplier block.

Map of Londonderry showing the proposed location for the Citrus Certification Facility



Map showing the Citrus Certification Facility buildings

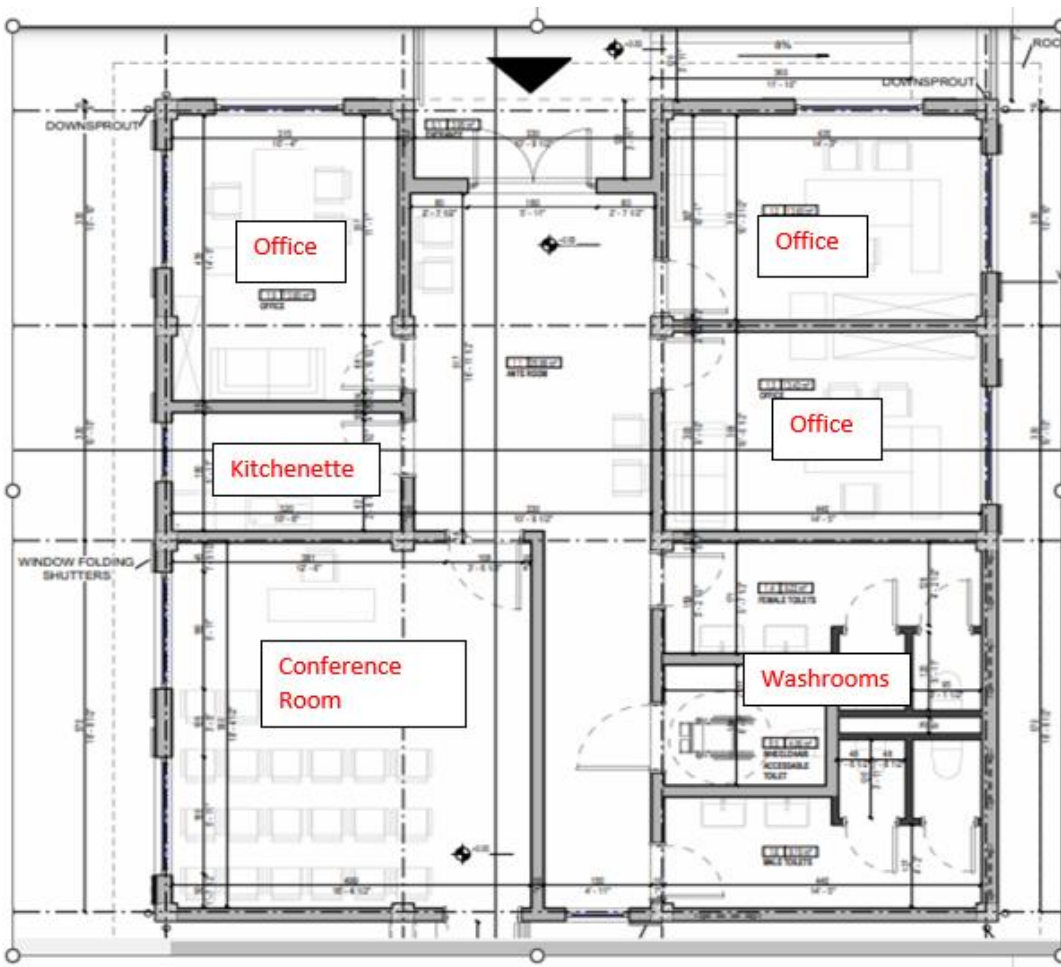


## 2.2 The Citrus Certification Facility Layout

### 2.2.1 Office Block

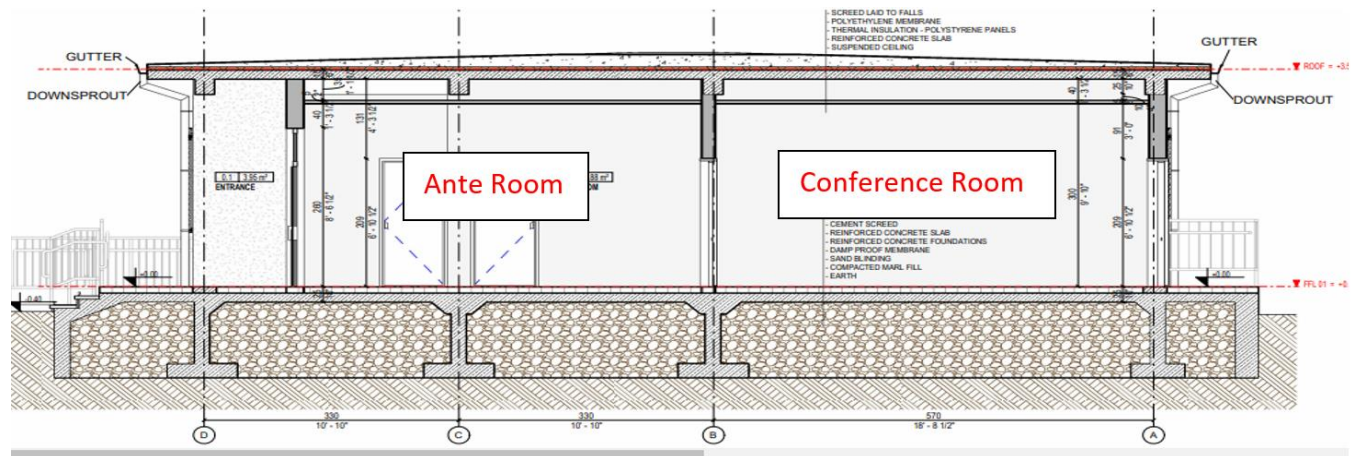
The single floor of the office block occupies a space of 43'2.5" in length by 40'2.5" wide, and comprises of a conference room with capacity to seat at least twenty-four (24) individuals; and three (3) Offices for key Staff. The washroom area comprises of five (5) toilets: two (2) male and two (2) female restroom and the fifth one has wheelchair access. There is an emergency door located in the conference room and the main front door can also be used to exit the front of the building. The three offices and conference room will be equipped with AC units with BTU compatible to the square footage. A grease trap will be installed on the kitchen sink for the separation of fats, oil and reduce clogging of the pipe drainage.

#### The Office Block- Floor Plan





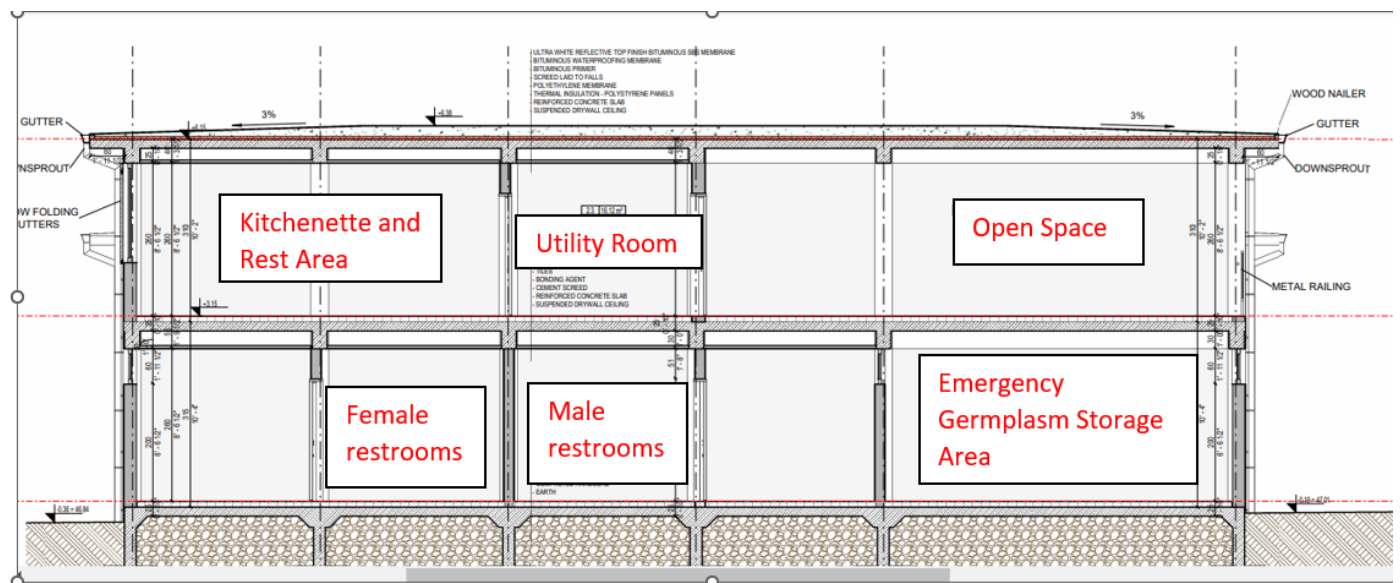
## Drawing showing the Office Block – Side view



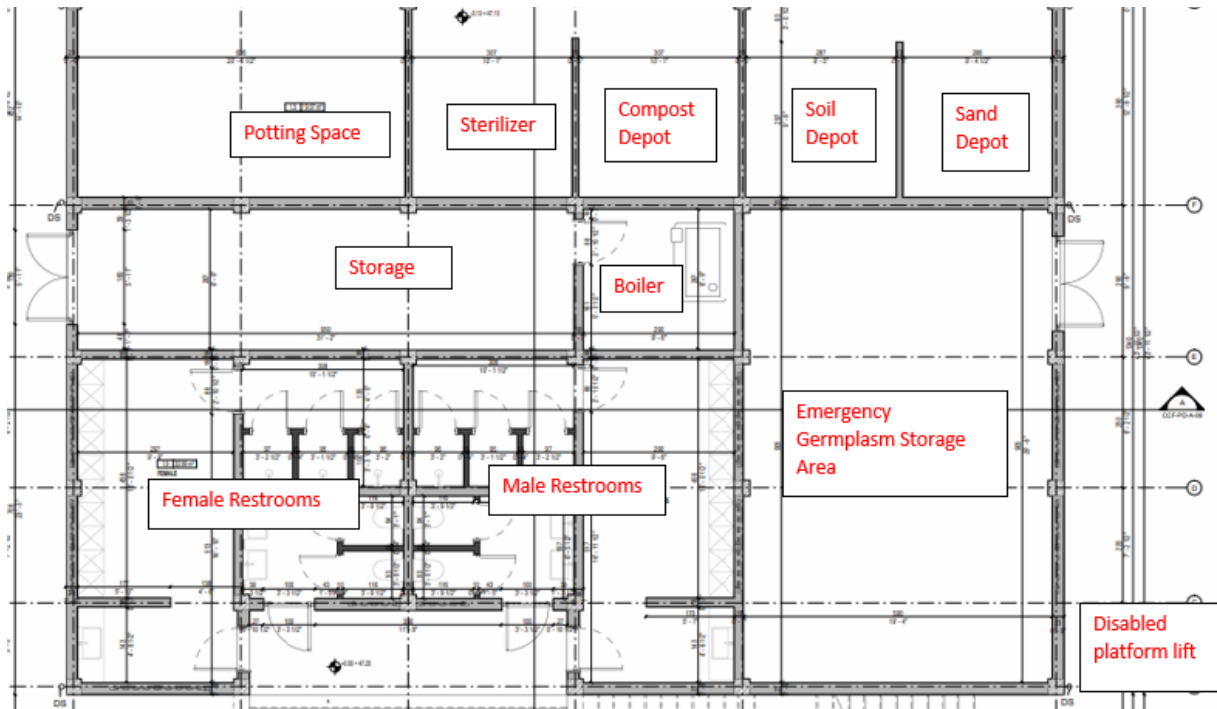
## 2.2.2 Potting House

The potting house has two stories. The ground floor which occupies an area 62' 8" in length by 41' 9" in width and houses an emergency germplasm storage area, male and female locker rooms, male and female toilets, a boiler room and storage area. Within the same square foot area, but with an open layout setting are the potting space, sterilizer area, compost depot, sand depot and soil depot. The se areas will be used for the preparation of soil formulation, potting soil in bags and planting. The first floor of the potting house is equipped with a kitchenette, equipped with a grease trap and eating area that can dine twelve (12) individuals. There are male and female toilets, a utility area and an open balcony area. The germplasm area will be equipped with an AC unit compatible with the square footage of the room. The square footage of all male toilet shall be of sufficient space and shall be equipped with rails and bars for accommodating disable individuals.

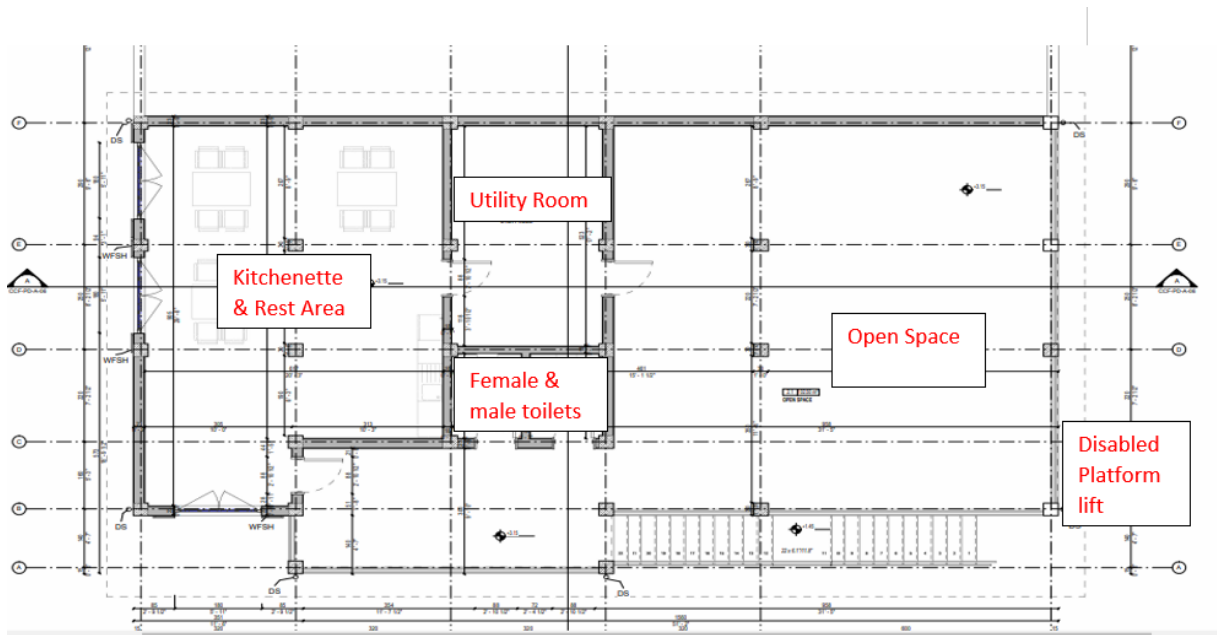
## Drawing showing Potting shed - side view



Drawing showing Potting Shed - Ground Floor



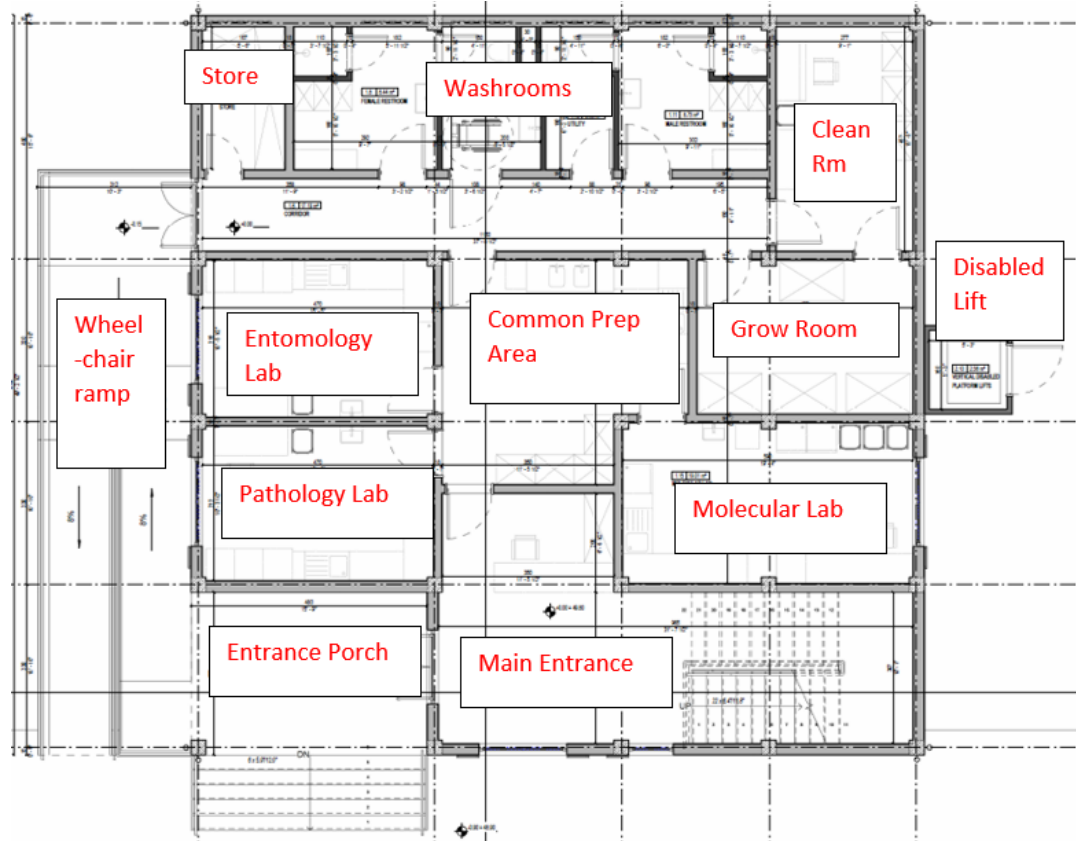
Drawing showing Potting house - First floor



### 2.2.3 Laboratory

The ground floor of the lab is 42' 8" long by 41' 8" wide and consist of male and female restrooms, utility room, clean room, grow room and a laboratory. This level is also equipped with disability facilities to include a ramp for wheelchair access and a disabled lift located outside the building taking disabled staff up to the first floor of the lab. A grease trap will be installed on the kitchen sink for the separation of fats, oil and reduce clogging of the pipe drainage.

Drawing showing Laboratory – Ground Floor

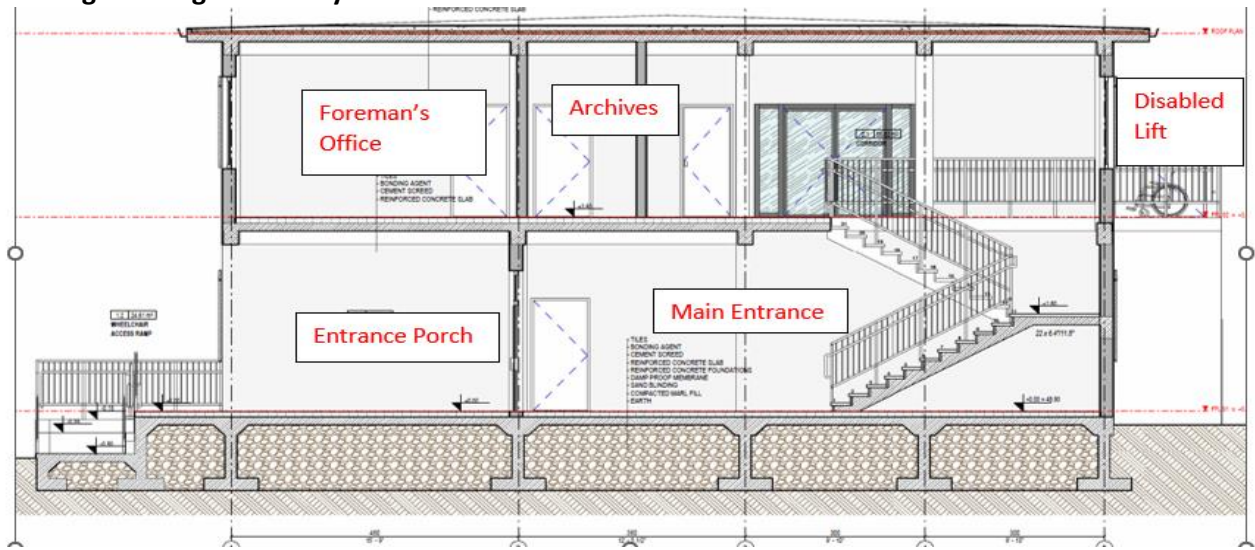


### Drawing showing Laboratory - First Floor Plan

The first floor of the laboratory comprises of office space to include those for the Manager, the Lab Technician, the Secretary, and the Foreman, male and female toilets and a Conference room with capacity to seat fifty (50) people. The square footage of all male toilet shall be of sufficient space and shall be equipped with rails and bars for accommodating disable individuals.



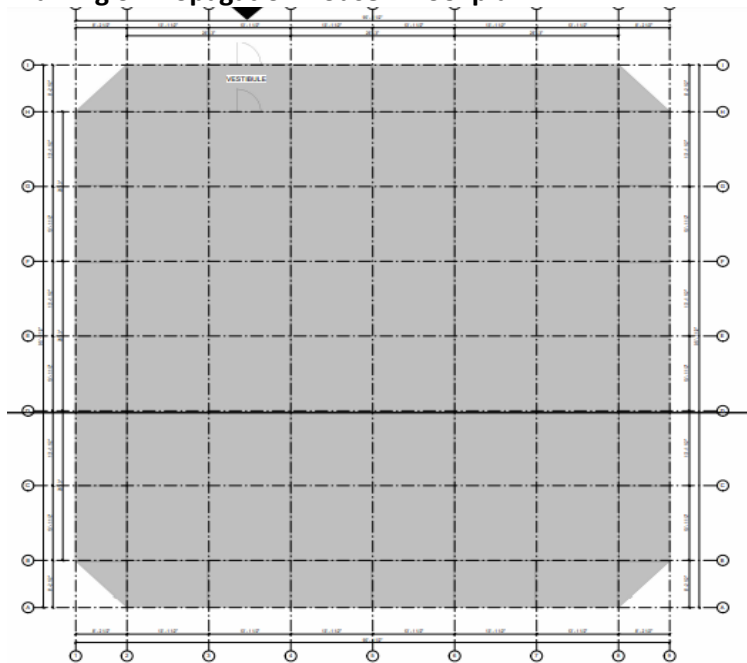
Drawing showing Laboratory- side view



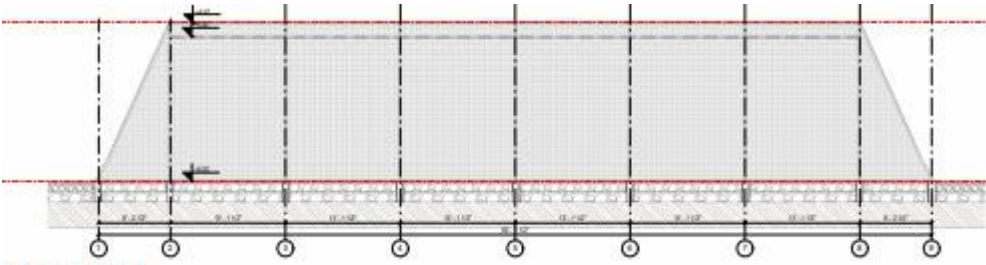
### 2.2.4 Propagation House(s)

The Citrus Certification Facility comprises of five (5) propagation houses each 95' ½" by 95' ½"

Drawing of Propagation House - Floor plan



**Drawing of Propagation House – side view**



## Chapter 3. The Legal and Administrative Framework

This ESMP was prepared against the background of ensuring construction of the proposed Citrus Certification Facility are managed, mitigated and compliant with the relevant laws of Dominica and the World Bank Environmental and Social Safeguards Policies and Environmental, Health and Safety Guidelines. A 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 Project (EALCRP). This ESMP attempts to address the significant environmental and social impacts and risks associated with the proposed Citrus Certification Facility construction.

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

#### 3.1.1 Physical Planning Act (2002)

The Physical Planning Act (2002) provides for the orderly and progressive development of land and for the granting of permission to develop land and for other powers of control over the use of land. This Act details the application and approval process which is executed through the Physical Planning Division of the Physical Planning and Development Authority. The Act states that *“No person shall carry out any development of land except under and in accordance with the terms of a development permission granted in that behalf prior to the commencement of such development”*. It makes provision for the Authority to consult with local authorities where such consultation is desirable in the interests of good planning.

#### 3.1.2 Environmental Health Services Act 1997

This Act is mandated by the Environmental Health Department and makes provision for the conservation and maintenance of the environment in the interest of health. This Act is very much applicable as it pertains to the management of waste and particularly that of sewerage.

#### 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 project's 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. It creates a Pesticides Control Board to advise the Minister and to carry out

provisions of the Act and its Regulations. It gives power of entry to an inspector. The Minister may make regulations to affect the provisions of the act. Subsidiary legislation includes the Pesticides Control (Labelling of Pesticides) Regulations and the Pesticides Control (Registration and Licensing) Regulations. This Act is relevant for the prevention of termite infestation prior to construction and treatment of diseased plants at the Citrus Certification Facility.

## 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 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 (<https://www.worldbank.org/en/projects-operations/environmental-and-social-policies>).

### 3.2.2 EHS Guidelines

Environmental, Health and Safety guidelines have also been prepared by the WB. There are general guidelines that cover most activities related to construction projects involving the renovation of existing buildings or construction of new facilities. Some parts of these general guidelines are applicable to the project, particularly such aspects as waste management, dust and noise control and workers' health and safety. For more information refer to the EHS Guidelines on the WB website.<sup>1</sup>

---

<sup>1</sup>[https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/policies-standards/ehs-guidelines](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines)



## Chapter 4. Potential Environmental and Social Impacts

The proposed construction of the new Citrus Certification Facility is expected to generate positive benefits such as increased quantity and quality of certified citrus (grapefruit, oranges, tangerines, mandarin and lime etc) planting material; increased technology and knowledge gain to propagation staff; create a better working environment, etc. Notwithstanding these positive benefits expected to accrue from the project, the following negative environmental and social impacts have been identified for construction of the Citrus Certification Facility. Mitigation measures for each of the impacts and risks identified below are presented in Chapter 5.

### 4.1 Construction Phase

#### 4.1.1 Site Access and Security

The Citrus Certification Facility will be located within the compounds of the Central Livestock Farm, where access is already restricted. During the construction phase of the Citrus Certification Facility access from the general public will be restricted by barricading the area with caution tape or signs indicating ongoing construction works.

The Citrus Certification Facility is away from neighbours and not close to any public facility.

#### 4.1.2 Noise, Air Quality and Dust control

During construction activities, noise and vibration may be caused by the operation of motorized equipment or power tools such as drills, electric saws, tile cutters. Noise from these small tools will not significantly impact any of the functions of the farm operation.

Fugitive dust formation from dry unpaved access road, tile, lumber or concrete cutting, cement dust from concrete mixing, as well as possible exhaust from combustion engines like generators or delivery truck engines can trigger respiratory illnesses for contractor workers.

#### 4.1.3 Debris and solid waste management

The construction of the Citrus Certification Facility will generate construction wastes such as damaged tiles, pieces of glass, cement bags and other construction material packaging and containers, a lot of pieces of wood, concrete waste, pieces of blocks, nails and scraps of building materials, etc. Waste generated from the construction works will be sorted based on organic and inorganic material. All inorganic waste in small quantities, primarily metals and hard plastic will be disposed of at the landfill managed by the Dominica Solid Waste Management Corporation. The EALCRP PIU Environmental Safeguards Specialist will monitor the disposal of these materials to ensure compliance with the laws of Dominica and the World Bank standards and policies.

#### 4.1.4 Traffic management

The construction site is not located along a main road and therefore it is not expected to have heavy traffic to cause any major congestion. However, construction activities will result in an increase in movement of heavy vehicles for the transportation of construction materials and equipment increasing the risk of traffic-related accidents and injuries to workers and local communities.

#### 4.1.5 Workers Health and Safety

The construction works on the Citrus Certification Facility will expose contractor and workers to potential health and safety risks. Exposure to health and safety risks will require the contractor to develop and implement an occupational health and safety plan (OHS), including, but not limited to, providing personal protection equipment (PPE) to workers, to prevent or reduce the risk of accidents at the work site. Specifically, the contractor will be responsible for implementing international good practice and safe work procedures in high-risk activities (such as when working on heights, scaffolds and ladders), and providing the appropriate PPE such as safety boots, helmets, reflective vest, gloves, protective clothes, dust mask, goggles, and ear protection at no cost to the workers.

The OSH plan should also cater for work with hazardous substances, electrical and fire safety and emergencies. A well-stocked first aid kit equipped with topical medication and supplies to treat basic construction related injuries, must be available to workers. The Contractor will also be required to prepare and submit a Code of Conduct to the EALCRP PIU for review and acceptance **(Annex 2)**.

Any accidents or near misses on the construction site must be documented by the Contractor and reported to the EALCRP PIU, Environmental Specialist. The Supervisor or Safety Officer assigned to the project must also check to see if there are any immediate risk of danger associated with the accident; secondly, ensure that the injured receives the appropriate medical attention. Thirdly, the matter should be reported to the PIU Office within 24 hours, where it is investigated as to the cause and provision of preventative measures are put in place to avoid reoccurrence. The matter will then be reported to the World Bank within 2 days (48hrs).

#### 4.1.6 Pest Management

Prior to construction of the Citrus Certification Facility the entire perimeter of the foundation of all proposed buildings must be treated to prevent the infestation of termites. 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.

#### 4.1.7 Wastewater and Sewage Management

The management of human wastes on site is also critical for maintaining a healthy working environment and reducing the risk of faecal contamination. The contractor will be responsible for providing and adequately managing portable sanitary units and hand wash stations. They will also be expected to manage on site run off and rinse water from construction activities. E.g. tools rinsing after concrete works or painting.

#### 4.1.8 Forced Labour

The Project will not use forced labour and/or child labour. Forced labour; persons working against their own free will. The Contractor shall have in place, a grievance redress mechanism for workers to raise workplace concerns and grievances including instances of forced labour. If the Contractor is unable to develop and implement a grievance redress mechanism (GRM), workers will be directed to use the EALCRP PIU's GRM to register complaints, issues or concerns. The Contractor needs to provide an avenue that avoid discrimination especially of vulnerable groups and allow employees to raise workers concerns.

#### 4.1.9 Child Labour

No person under the age of 18 years will be employed or engaged in any project activity. Contractor will enforce the Code of Conduct (see Annex 2) to prevent child labour; i.e., any person, under 18 years.

#### 4.1.10 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 2) measures to address sexual exploitation and abuse and sexual harassment incidents that may occur in the work place.

#### 4.1.11 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.

## 4.2 Operation Phase

The potential impacts of the Citrus Certification Facility include wastewater, waste management, energy and water consumption, staff health and safety and emergency response.

### 4.2.1 Wastewater

Wastewater from the Citrus Certification Facility will include water generated from kitchens and washroom area, the lab, potting shed and office block. The Contractor shall install grease trap on all kitchen sinks. The contaminants from such water will be minimal and will have little impact on surface or ground water as this water is drained into the soak away system.

### 4.2.2 Waste management

The Citrus Certification Facility will generate both organic and inorganic waste, including hazardous waste each of which must be managed appropriately. Organic waste would include mainly paper, kitchen waste primarily from the Offices and potting shed. The bulk of the organic waste will come from cropping systems, residues (leaf material, roots, and other plant parts) and can be recycled beneficially to improve soil organic matter and soil structure, as well as to reduce soil loss.

Non-crop wastes from the Citrus certification facility (e.g., pesticide containers, potting bags, greenhouse plastic and packaging) often have the potential to contribute to adverse health, safety, or environmental impacts. Inorganic waste from those building will be stored in garbage bins for weekly pick-up by the Dominica Solid Waste Management Corporation.

Hazardous waste generated will be from the laboratory, this will include reagents, batteries, solvents, oil and residues of chemical used for conducting test. These hazardous wastes will be placed in a separate container labelled as being hazardous and taken to the landfill where it will be treated as such.

### 4.2.3 Energy Conservation

Electricity will be powered by Dominica Electricity Services Ltd. (DOMLEC) and will be used for lighting, heating, cooling, and ventilation. Energy efficiency methods will be applied to reduce losses in energy distribution, improve energy conversion efficiency, exploit energy purchasing opportunities and overall lower the use of carbon fuels. Energy saving appliances to include Light Emitting Diode (LED) bulbs, and air condition (AC) unit with the correct British Thermal Unit (BTU) based on the area of the building to be air conditioned. Architectural designs will allow for sufficient natural lighting and location of windows for adequate ventilation in the absence of AC or power.

#### 4.2.4 Water Conservation

The Citrus certification Facility will be connected to water which is being used for drinking and other operation. The energy demand for Citrus Certification Facility will include water, supplied by Dominica Water and Sewage Company (DOWASCO) with backup storage tanks and pumping system already in place on the Central Livestock Farm.

#### 4.2.5 Emergency Response

An Emergency Response Plan is a set of scenarios-based procedures to assist staff and emergency response teams during real life emergency and training exercises. The plan should include roles and responsibilities, emergency exit routes, and muster point(s). The Citrus Certification Facility will be equipped with a functional fire extinguisher at strategic locations, e.g. at kitchen and at lab and a well-stocked first aid kit. Workers must be trained on the emergency plan and in particular, how to use fire extinguishers to put out any fire that may occur.

#### 4.2.6 Occupational Health and Safety

Supervisors of the Citrus Certification Facility are obliged to implement all reasonable precautions to protect the health and safety of workers. Preventive and protective measures should be introduced to eliminate and if not mitigate negative impacts, including that of sanitary measures to reduce spread of communicable diseases. The Citrus Certification Facility must be structurally safe, provide appropriate protection against the climate, and have acceptable furniture, lighting and noise conditions. The Emergency Plan at 4.3.4 above will aid in ensuring a safer workplace.

## 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 and 5.2 below for site preparation and construction of the Citrus Certification Facility respectively.

### 5.1 Construction Phase

Aspect	Potential Impacts	Proposed Mitigation
Site Access and Security	<ul style="list-style-type: none"> <li>○ Injury to workers and unauthorised persons entering the site</li> </ul>	<ul style="list-style-type: none"> <li>○ Barricade construction site with caution tape.</li> <li>○ Place sign indicating no authorised persons allowed.</li> <li>○ Contractor will implement an OHS management plan</li> </ul>
Construction Waste and Debris	<ul style="list-style-type: none"> <li>○ Improper storage and/or disposal of materials</li> <li>○ Creating land pollution by dispersion of materials.</li> </ul>	<ul style="list-style-type: none"> <li>○ The contractor shall dispose of material debris and solid waste in accordance with approved procedures of Dominica Solid Waste Management Corporation (DSWMC).</li> <li>○ Construction wastes must be stockpiled away from circulation areas and not pose safety hazards to construction workers, wastes must be stored in containers and removed from the site on a regular basis; containers must not overflow.</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>○ Ensure appropriate and safe disposal of contaminants such as fuels, construction materials and wastes.</li> </ul>
Pesticide application	<ul style="list-style-type: none"> <li>○ The risk of pesticide application may lead to accidental exposure 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> </ul>

Aspect	Potential Impacts	Proposed Mitigation
		<ul style="list-style-type: none"> <li>○ Read MSDS and labels and abide by the instructions, to include storage &amp; disposal, direction for use, precautionary statements and first aid.</li> <li>○ Pesticides should be applied after working hours, and by a qualified person or firm.</li> <li>○ Ensure all packaging for pesticides and herbicides are collected from the field after use and properly stored until final disposal.</li> <li>○ Follow the project IPMP.</li> </ul>
Sewage/Wastewater Management	<ul style="list-style-type: none"> <li>○ Improper disposal and treatment of sewage/wastewater can have adverse impacts on human health and the environment</li> </ul>	<ul style="list-style-type: none"> <li>○ Portable sanitary units will be established to collect human wastes. Human waste will be disposed at sewage treatment facility to comply with local laws and regulations of Dominica.</li> <li>○ Grey water from hand wash and construction tools washing should be managed into suitable drainage</li> </ul>
Air Quality, Dust and noise from construction activity	<ul style="list-style-type: none"> <li>○ Air pollution may increase the risk of respiratory ailments to construction workers.</li> <li>○ Noise generation from the use of machines and construction equipment will have minimal impact on farm workers and visiting farmers.</li> <li>○ Poor air quality due to emissions from combustion engines and dust generated</li> <li>○ Tinnitus and hearing loss is a risk to those in direct exposure to noise</li> </ul>	<ul style="list-style-type: none"> <li>○ Dust suppression methods such as wetting materials, dust barriers/curtains, or slowing work should be employed as needed to avoid visible dust from demolition or construction activities</li> <li>○ PPEs - Use standardised/certified dust masks/ respirators when working in construction 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>○ Maintain vehicles and Contractor's machinery according to maintenance requirements. Ensure exhaust is downwind to employees and the public. Throttle down or turn off</li> </ul>

Aspect	Potential Impacts	Proposed Mitigation
		<p>engines when not in use for more than 5 minutes.</p> <ul style="list-style-type: none"> <li>○ Train employees on best procedures to reduce dust, exhaust and noise.</li> </ul>
<p>Traffic Management during renovation activities</p>	<ul style="list-style-type: none"> <li>○ Traffic congestion and unsafe transportation of construction materials on and off site.</li> </ul>	<ul style="list-style-type: none"> <li>○ Ensure that contractor employs only competent drivers, with valid driver's licenses.</li> <li>○ Maintain the free movement of traffic on project access roads.</li> <li>○ Site access roads are to remain free of any spillage.</li> <li>○ Establish road signage to warn and inform motorist of construction works.</li> <li>○ Installing traffic signs cautioning motorist that are traveling in and around the Facility.</li> <li>○ Truckers delivering materials need to exercise caution.</li> <li>○ Use a banksman when necessary to avoid accidents within site and along public road</li> </ul>
<p>Workers' health and safety</p>	<p>Workers' accidents and ill-health of workers on the construction site</p>	<ul style="list-style-type: none"> <li>○ Contractor must prepare and submit incident reports to the PIU.</li> <li>○ Train workers on prevention of accidents and managing incidents.</li> <li>○ Train workers on hygiene and sanitation practices to avoid spread of communicable diseases</li> <li>○ Enforce policy for sick days and sick leave</li> <li>○ Workers must wear personal protective equipment (PPE).</li> <li>○ Provide first aid kit and emergency plan for accidents or incidents.</li> </ul>



Aspect	Potential Impacts	Proposed Mitigation
		<ul style="list-style-type: none"> <li>○ Contractor must develop and implement Management Strategies and Implementation Plans (MSIP) including a site-specific OHS management plan for the most dangerous activities, such as, working on heights (ladder or scaffolding), among others and develop Standard Operation Procedures -SOP prior to the start of works.</li> <li>○ Contractors must also develop a Job Hazard Analysis and convene Daily Safety Talks.</li> </ul>
Workers sexual exploitation, sexual abuse and sexual harassment	Physical, psychological abuse of a sexual nature interferes with the productivity of work and displays a lack of respect for project workers	<ul style="list-style-type: none"> <li>○ Contractor must prepare and submit incident reports to the PIU and World Bank.</li> <li>○ Contractor must also investigate to find out the root causes of accidents or incident and provide preventative measures to avoid reoccurrences</li> <li>○ Contractor is required to develop and implement a Code of Conduct reflecting community, health and safety prevention and mitigation measures, including, prevention of gender-based violence and sexual exploitation and abuse (Annex 2)</li> <li>○ The contractor will need to put in place multiple channels for mitigating and registering complaints in a safe and confidential manner.</li> <li>○ This Code of Conduct must be signed by all the Contractor's workers on the project. Sensitization on the Code of</li> </ul>

Aspect	Potential Impacts	Proposed Mitigation
		<p>Conduct and the grievance mechanism must also be carried out with workers at induction to the project.</p>
<p>Labour and working conditions</p>	<p>unfair treatment and discrimination and unequal opportunity of project workers</p>	<ul style="list-style-type: none"> <li>○ No person under the age of 18 years will be employed or engaged in any project activity.</li> <li>○ Contractor will enforce Code of Conduct to prevent child labour i.e any person under the age of 18 years and forced labour, avoid discrimination especially of vulnerable groups and allow employees to raise workers concerned.</li> <li>○ The Contractor will develop a Grievance Redress Mechanism, so that workers can file complaints or develop a means where employees concerns are addressed.</li> </ul>

## 5.2 Operation Phase

<b>Aspect</b>	<b>Potential Impacts</b>	<b>Proposed Mitigation</b>
Sewage/Wastewater Management	Improper disposal and treatment of sewage/wastewater	<ul style="list-style-type: none"> <li>○ Sewage/wastewater disposal and treatment system will comply with local laws and regulations of Dominica.</li> <li>○ Waste from kitchen will be drain together with storm water.</li> </ul>
Water Consumption	Depletion of water as a limited resource Increase the cost on water use Excessive run-off	<ul style="list-style-type: none"> <li>○ Regularly maintain plumbing, and identify and repair leaks</li> <li>○ Shut off water to unused areas</li> <li>○ Install self-closing taps and automatic shut-off valves.</li> <li>○ install water conserving fixtures (e.g. low flow shower heads, faucets, toilets, urinals.</li> <li>○ install spring loaded or sensed faucets.</li> <li>○ Operate dishwashers and laundries on full loads.</li> <li>○ Install water-saving equipment in lavatories, such as low flow toilets</li> </ul>
Waste Management	Contamination of land and water.	<ul style="list-style-type: none"> <li>○ Non-organic solid waste will be stored in designated containers with lids between collection times, collected and disposed of by DSWMC.</li> <li>○ Organic waste will be collected in the designated composting area within the compound</li> </ul>
Energy Consumption	Increase the impacts of fossil fuel and emissions.	<ul style="list-style-type: none"> <li>○ Use correct BTU based on square footage</li> </ul>

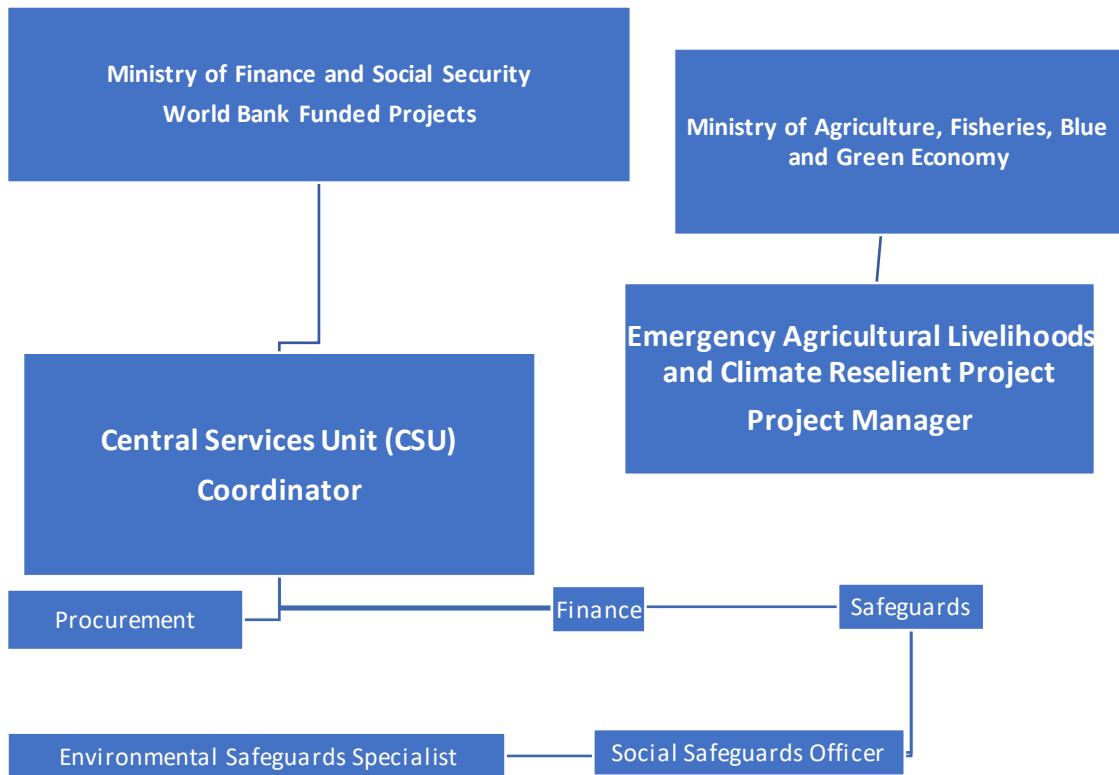
Aspect	Potential Impacts	Proposed Mitigation
Emergency Preparedness and Response	<ul style="list-style-type: none"> <li>○ Accidental fire</li> <li>○ Accidental Spill (solvents)</li> <li>○ Injury to farm workers</li> <li>○ Natural disasters (severe weather, hurricane, earthquake, flooding, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>○ Develop an Emergency Preparedness and Response Plan to address the most common and likely emergency medical and natural disasters' events</li> <li>○ Fire extinguishers should be strategically located in the office and in the lab.</li> <li>○ A well stock FAK should be available to treat minor injuries and ailments occurring on the farm or in the lab.</li> <li>○ Develop training plan to address firefighting and evacuation (earthquakes, hurricane and flooding)</li> <li>○ Emergency exits should always be unobstructed.</li> <li>○ Exits should be clearly marked (or luminated) to be visible in total darkness.</li> </ul>
Occupational Health and Safety Worker/employee accidents/injury on property	Worker/employee accidents/injury on property, or ill health of staff	<ul style="list-style-type: none"> <li>○ Wear appropriate protective clothing, such as a long-sleeved shirt, long pants, hat, gloves, and boots.</li> <li>○ Regularly monitor performance and conduct maintenance of equipment</li> <li>○ Train staff how to use PPE and ensure there is adequate supply</li> <li>○ Regularly clean offices and high touch areas; ensure cleaning supplies and hand soap are available</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 through the Central Services Unit. This newly established Unit provides procurement, finance and safeguards functions for all World Bank funded projects in Dominica, including the Emergency Agricultural Livelihood and Climate Resilient Project. The Central Services Unit is managed by a Coordinator who reports to the Financial Secretary within the Ministry of Finance. The figure below provides an overview of the organizational structure that will support and implement the installation and operation of the Feed Mill.

**ORGANISATIONAL CHART FOR THE CENTRAL SERVICES UNIT**



The PIU will have the overall responsibility for project implementation. The Project Implementation Unit (PIU) is physically located at 19 King George V St, Roseau. A Project Manager will lead the day-to-day implementation of the project and will report to the Permanent Secretary, Ministry of 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 CSU environmental and social specialists will be responsible for the day-to-day activities in instructing and monitoring compliance with World Bank safeguards and the relevant laws of Dominica, including this ESMP.

## 6.2 Contractor Responsibilities

Engagement of Contractors will be managed by the EALCRP PIU. Standard environmental and social related requirements will be included in the bidding documents, including compliance with this ESMP. Therefore, for purposes of cost estimation and budgeting, the contractors should be aware of the existence of the environmental mitigation measures and associated ESMP requirements established herein and include cost items for such purposes in their proposals. Environmental and social related clauses will also be developed and appended to or incorporated into contracts and shall remain in force throughout the contract period.

## 6.3 Supervision, Monitoring and Reporting

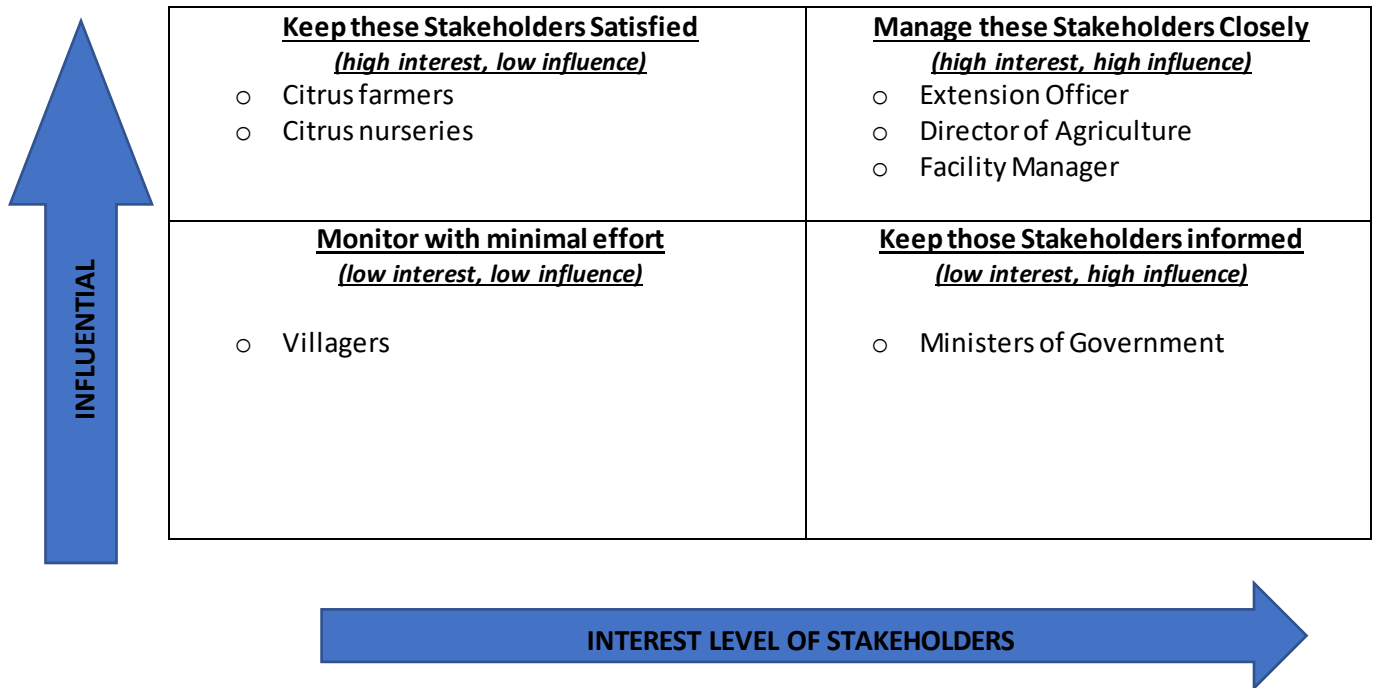
It is the responsibility of the CSU Environmental Safeguards Specialist to ensure that the ESMP is being followed by the contractor(s) and site workers. This will be done by conducting monthly visits as required throughout the construction phase. The PIU Project Engineer is the technical person for monitoring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

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

## Chapter 7. Stakeholder Engagement

### 7.1 Consultations

The decision was made to have the citrus certification facility relocated from the Botanical Gardens in Roseau to a more spacious location on the Central Livestock Farm at Londonderry. Staff of the Ministry of Agriculture, primarily Extension Officers and Propagation Staff informed farmers, nurseries and citrus growers on the relocation of the new Citrus Certification Facility.



### 7.2 Disclosure

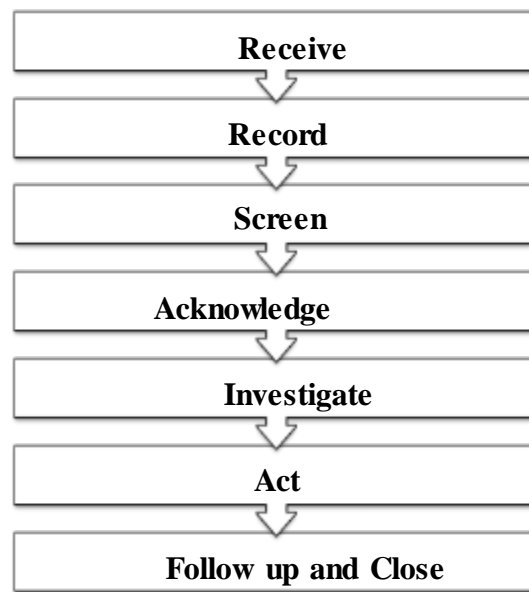
This ESMP is a working document and involves numerous engagements with different stakeholders prior and during construction. The ESMP will be disclosed on the EALCRP PIU's website at <http://piu.agriculture.gov.dm/safeguards>, after it has been reviewed and cleared by the World Bank. This disclosure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

## 7.3 Grievance and Redress Mechanism (GRM)

### 7.3.1 EALCRP PIU GRM

The EALCRP PIU has prepared a project-wide Grievance Redress Mechanism (GRM) to receive and facilitate the resolution of concerns and grievances associated with the PIU and/or project related activities. Any grievances associated with the construction of the Citrus Certification Facility 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 via:

- **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)
  - Social Safeguards Officer, Kamarsha Sylvester email: [sylvesterk@dominica.gov](mailto:sylvesterk@dominica.gov)
- **Write a letter:** to the EALCRP PIU, Project Manager, Emergency Agricultural Livelihoods and Climate Resilience Project (EALCRP), 19 King George V St., Roseau, Dominica to complain (respond to letters via telephone or email, inviting complainant to complete an



official grievance form/transfer information from letter to grievance form; record complaint in log)

- **Telephone: Complainants can call the EALCRP PIU at (767) 266 3998**
- **In Person:** Complainants can report to the EALCRP PIU office at 19 King George V St., Roseau, Dominica, to complete and submit a grievance form. They can also register their complaint directly to the Environmental and Social Safeguards Specialists.
- **Anonymous Complaints:** are accepted through all above-mentioned channels. Complainants can submit their grievances without providing personal contact information.
- **PIU Project Manager or Staff Complaints:** Complainants can telephone, email or write letters to the Permanent Secretary, Ministry of Blue and Green Economy and Agriculture and National Food Security.

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

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

### 7.3.2 Addressing Sexual Exploitation And Abuse And Sexual Harassment (Sea/Sh)

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

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

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

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

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

**Sexual harassment (SH)**

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

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

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

**Survivor-centered approach**

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

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

SEA/SH grievances can be received through any of the available channels and will be considered level 3 grievances investigated and addressed by the GRC. A list of SEA/SH service providers will be kept available by the Project. Additionally, if an incident occurs, it will be reported as appropriate, keeping the anonymity and confidentiality of the complainant and applying the survivor-centered approach<sup>7</sup>. Any cases of SEA/SH brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor. The WB will be notified as soon as the Project Manager and the E&S specialist learn about the complaint.

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

### **ACTION 1: COMPLAINT INTAKE AND REFERRAL**

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

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

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

### **ACTION 2: INCIDENT REPORTING**

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

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

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

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

### **ACTION 3: GRIEVANCE VERIFICATION AND INVESTIGATION**

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

If after the committee review, SEA/SH allegation is confirmed and it is determined that it is linked to a project<sup>28</sup>, the verification committee discusses appropriate actions to be recommended to the appropriate party—i.e., the employer of the perpetrator, which could be the PIU or a contractor. The PIU will ask contractors to take appropriate action. The committee reports the incident to the perpetrator’s employers to implement the remedy/disciplinary action in accordance with local labor legislation, the employment contract of the perpetrator, and their codes of conduct as per the standard procurement documents.

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

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

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

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

---

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

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

### 7.3.3 World Bank Redress Mechanism

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

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

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

## Chapter 8. ANNEXES

### Annex 1: Environmental and Social Screening Checklist

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

#### Section A: Background information

Subproject Name	Restoration of Key Infrastructure in Agriculture and Forestry
Subproject Purpose	<input checked="" type="checkbox"/> New Structure <input type="checkbox"/> Expansion of existing structure <input type="checkbox"/> Renovation of existing structure <input checked="" type="checkbox"/> Construction of waste disposal system
Subproject Location	Citrus Certification Facility, Londonderry
Subproject property ownership	<input checked="" type="checkbox"/> Government of the Commonwealth of Dominica <input checked="" type="checkbox"/> Own <input type="checkbox"/> Lease Agreement
Subproject current property use	<input type="checkbox"/> Industrial <input type="checkbox"/> Commercial <input checked="" type="checkbox"/> Residential
Subproject Component	Construction of Citrus Certification Facility
Estimated Investment	
Expected Start/Completion Date	May 2024 – December 2024

#### Section B: Construction Issues

Will the sub-project:	Yes	No
Demolish existing structures and require disposal of construction materials? ?		X
Demolish existing structures and require disposal of hazardous materials?		X
Involve the generation of a significant amounts of solid and liquid waste?	X	
Construction work 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 (or other communicable diseases)?		X

#### **Section E: Natural Habitat**

Will the sub-project:	YES	NO
Be located within environmentally sensitive areas (e.g., intact natural forests, mangroves, wetlands) or threatened species?  NB: If the answer is yes, the sub-project should prepare a Natural Habitats Plan (see ESMP).		X
Adversely affect environmentally sensitive areas or critical habitats – wetlands, woodlots, natural forests, rivers, protected areas including national parks, reserves or local sanctuaries, etc.)?  NB: If the answer is yes, the sub-project should not proceed.		X
Affect the indigenous biodiversity (flora and fauna)?  NB: If the answer is yes, the sub-project should not proceed.		X
Cause any loss or degradation of any natural habitats, either directly (through project works) or indirectly?  NB: If the answer is yes, the sub-project should not proceed.		X
Affect the aesthetic quality of the landscape?		X
Reduce people’s access to the pasture, water, public services or other resources that they depend on?		X
Increase human-wildlife conflicts?		X
Use irrigation system in its implementation?		X

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

### Section F: Pesticides and Agriculture Chemicals

Will the sub-project:	YES	NO
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 (VMG) 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.

## Annex 2: Sample Code of Conduct

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

#### **Our Commitment**

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

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

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

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

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

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

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

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

*Each personnel shall comply with the following:*

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

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

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

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

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

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

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

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

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

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

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

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

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

9. The use of illegal substances

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

19. Duty to report violations of this Code

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

### ***Monitoring and Reporting***

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

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

The person's identity will be kept confidential, unless reporting of the allegation is mandated by law of the Commonwealth of Dominica. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action in collaboration with the Project. We will provide warm

referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

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

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

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

### **Communication to Communities**

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

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

## **Appendix 1**

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

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

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

- Consultant's Personnel tells a member of the community that he/she can get them jobs on the project work site (e.g. cleaning, masonry) in exchange for sex or sexual acts
- Consultant's Personnel says that he can give priority for job considerations to women in exchange for sex
- Consultant's Personnel rapes, or otherwise sexually assaults a member of the community or project stakeholder

- Consultant's Personnel denies a person access to the site unless he/she performs a sexual favor
- Consultant's Personnel tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her

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

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

FOR CONTRACTOR'S PERSONNEL:

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

Name of Contractor's Personnel: [insert name]

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

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

Counter signature of authorized representative of the Contractor:

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

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