



International

Sint Maarten

**Civil Society Partnership Facility for Resilience Project
(CSPFRP) (P172339)**

**Environmental and Social Commitment Plan
(ESCP)**

June 2020

- AGREED AT NEGOTIATION -

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The International Cooperation Agency of the Association of Netherlands Municipalities (VNGI) will implement the Civil Society Partnership Facility for Resilience Project (CSPFRP) (the **Project**). The International Bank for Reconstruction and Development (the **Bank**), acting as an administrator of Sint Maarten Hurricane Irma Reconstruction, Recovery and Resilience Program Single-Donor Trust Fund, has agreed to provide financing for the implementation of the Project.
2. VNGI will implement material measures and actions so that the preparation and implementation of the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. VNGI will also comply with the provisions of any other Environmental and Social (E&S) documents required under the ESSs and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), the Stakeholder Engagement Plan (SEP) and the timelines specified in those E&S documents.
4. VNGI is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the agencies referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by VNGI as required by the ESCP and the conditions of the Grant Agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and VNGI, this ESCP may be revised from time to time during Project implementation to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, VNGI will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and VNGI. VNGI will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance results in changes to the risks and impacts during Project implementation, VNGI shall provide additional resources, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts and gender-based violence.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, the implementation of the ESCP and the ESMF, occurrence of incidents and accidents, stakeholder engagement activities, functioning of the grievance redress mechanism (GRM) and other aspects of monitoring ESHS as detailed in the ESMF. Any logs maintained for recording grievances shall be made available to the Bank upon request.</p>	<p>Quarterly reports throughout Project implementation submitted to the Bank no later than 15 days after the end of each quarter.</p>	VNGI
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, such as possible impact of natural hazards during Project implementation.</p> <p>Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, whilst taking into account relevant data protection and privacy laws. Subsequently, as per the Bank’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p> <p>A Borrower’s Guide to Response to Environmental, Social and Occupational Health and Safety Incidents for World Bank Financed Projects that further details how to address any incidents or accidents and to be included as an annex to the ESMF.</p>	<p>Within 48 hours after learning of any fatality or other incident or accident. Timing of the subsequent report will be provided within a timeframe acceptable to the Bank, as requested.</p> <p>Additional details on incidents/accidents will be reported and grievance records submitted to the Bank upon request.</p>	VNGI
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>VNGI will establish and maintain an organizational structure with qualified staff and resources to support management of ESHS risks of the Project, including one environmental and social specialist with qualifications and experience acceptable to the Bank.</p>	<p>The environmental and social specialist with terms of reference acceptable to the Bank, shall be hired within 30 days of effectiveness in the form of short term consultant and the positions shall be maintained throughout Project implementation.”</p>	VNGI
1.2	<p>ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK</p> <p>VNGI shall: (i) disclose, update, adopt and thereafter implement the Environmental and Social Management Framework (ESMF) for the Project; (ii) screen any proposed grant to Civil Society Organizations (CSOs) in accordance with the ESMF, and thereafter, supervise the implementation of the grants to CSOs, as required under the ESMF, in a manner acceptable to the Bank.</p> <p>The updated ESMF shall include, inter alia, screening criteria, summary of consultations, the guide referred to in action B above, and all other ESHS requirements applicable to CSOs as beneficiaries of small grants.</p>	<p>Updated version of the ESMF to be submitted to the Bank for approval and thereafter disclosed at least 30 days before the first call of applications for grants is launched. The ESMF shall be implemented thereafter throughout Project implementation.</p>	VNGI
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>a) Finalize, adopt, and implement the Labor Management Procedures (LMP) with GRM for project workers, in a manner acceptable to the Bank.</p> <p>b) LMP to include a plan for operating the Sint Maarten PIU office with COVID-19 safety measures in place.</p>	<p>a) Finalized and submitted to the Bank for approval within 30 days of grant effectiveness.</p> <p>b) same as a) above</p>	VNGI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance redress mechanism (GRM) for the project workers as described in the LMP and consistent with ESS2.</p> <p>a) GRM for project workers of the PIU shall be established.</p> <p>b) Prepare a one-page GRM template for project workers under sub-project grants for inclusion in the grant application package.</p>	<p>a) Prepared with 2.1 above and maintained throughout Project implementation.</p> <p>b) Approved by the Bank before the first call for applications for grants is launched.</p>	VNGI
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Prepare, and require CSOs to implement OHS measures to applicable grants consistent with ESS2 as underlined in the ESMF.</p>	same timeframe as action 1.2 above.	VNGI
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Prepare, and require CSOs to implement resources efficiency and pollution prevention and management requirements to applicable grants consistent with ESS3 as underlined in the ESMF.</p>	same timeframe as action 1.2 above.	VNGI
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY Prepare, and require CSOs to implement measures and action to assess and manage specific risks and impacts to the community arising from grant activities, including, inter alia behavior of workers, risks of labor and include these measures in the guidelines to CSOs as underlined in the ESMF.</p>	same timeframe as action 1.2 above.	VNGI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.2	<p>GBV AND SEA RISKS Implement measures to prevent and respond to gender-based violence (GBV) and sexual exploitation and abuse (SEA)</p> <p>a) Have in place a Code of Conduct for the PIU and require CSOs to inform communities about GBV and SEA grievance mechanisms.</p> <p>b) Have in place and maintain a GBV/SEA independent counsellor on retainer/ on-call basis.</p>	<p>a) Throughout project implementation.</p> <p>b) Two weeks prior to the first call for applications.</p>	VNGI
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
Not relevant for the Project			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Relevant aspects of this standard to be considered under action 1.2 above.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not relevant for the Project			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE Prepare, and require CSOs to implement measures and actions to assess and manage specific risks and impacts to the cultural heritage arising from grant activities and include mitigation measures in the guidelines to CSOs as underlined in the ESMF.</p> <p>Specifically prepare a cultural heritage screening template for CSOs, approved by the WB before the first call for applications for grants is launched.</p>	same timeframe as action 1.2 above.	VNGI
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant for the Project			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>a) Updated SEP submitted to the Bank for approval and then disclose publicly in country on an accessible site where the public can easily download the document.</p> <p>b) Implement the SEP.</p>	<p>a) Updated SEP to be submitted to the Bank for approval and thereafter disclosed at least 30 days before the first call for proposals.</p> <p>b) Throughout Project implementation.</p>	VNGI
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>a) Revise GRM for the Project to contain all contact details and a revised process to be approved by the Bank, as described in the draft SEP.</p> <p>b) GRM operated and recording and tracking to be maintained.</p>	<p>a) submitted, approved and disclosed as set out in action 10.1 above.</p> <p>b) throughout Project implementation and made available to the Bank upon request.</p>	VNGI
CAPACITY SUPPORT (TRAINING)			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CS1	<p>TRAINING</p> <p>1) Organize both generic information sessions and provide TA support to staff of organizations less adept to submitting complex project proposals. Support will provide CSOs with the necessary assistance during the preparation stage resulting in higher quality proposals and strengthen the internal technical capacity of CSOs resulting in better operating organizations</p> <p>2) All CSO staff involved in subproject implementation will follow a Pre-Disbursement Training (PDT) session which is mandatory, and which will be organized before the first financial transaction is made. During this training session, staff will become acquainted with all Occupational Health and Safety (OHS) procedures as described in the relevant E&S documents as well as in the Operations Manual (OM) which will be the guideline for grantees during implementation. Training for Project workers on OHS including emergency prevention and preparedness and response arrangements to emergency situations may include:</p> <ul style="list-style-type: none"> • workplace safety; • incident reporting procedure; • emergency preparedness procedures; • grievances procedure <p>Upon request and whenever there is a need, which might be the case in situations where there is a large staff turnover at grantee side, there will be refresher training sessions organized by the Project staff.</p> <p>3) Learning Benchmark Training (LBT) to be organized where CSOs can reflect their experiences and share experiences with other stakeholders. During site visits, where progress on subproject implementation is checked, Project team members can verbally insist corrective measures when they foresee health or safety risks.</p>	<p>Before each of the application rounds starts just after the general announcement.</p> <p>After the selection has been made and before VNGI makes the first disbursement.</p> <p>At least one time per year during Project implementation, there will be a LBT session organized.</p>	VNGI