



NRPB
NATIONAL RECOVERY
PROGRAM BUREAU

The Government of Sint Maarten
National Recovery Program Bureau

**Sint Maarten Emergency Response Project I
ERP 1**

Environmental and Social Management Plan

National Recovery Program Bureau

Date: (insert date of submission to WB)

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Abbreviations and Acronyms

ANG	Netherlands Antillean Guilder
C-ESMP	Contractor's Environmental and Social Management Plan
EIA	Environmental Impact Assessment
EHSGs	Environmental Health and Safety Guidelines
ESF	Environmental and Social Framework
ESHS	Environmental Social Health and Safety
ESMP	Environmental and Social Management Plan
GDP	Gross Domestic Product
GIIP	Good International Industry Practice
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GoSM	The government of Sint Maarten
HIV/AIDS	Human immunodeficiency virus infection and acquired immune deficiency syndrome
ILO	International Labour Organization
MSIP	Management strategies and Implementation Plans
NRRP	National Recovery and Resilience Plan
O&M	Operation and Maintenance
OHS	Occupational Health and Safety
O&M	Operation and Maintenance
PIU	Project Management Unit
SDTF	Single Donor Trust Fund
VROMI	Ministry of Public Housing, Spatial Planning, Environment and Infrastructure
USEPA	United States Environmental Protection Agency
WBG	World Bank Group

Introduction

On September 6, 2017, Hurricane Irma, a Category 5 hurricane, hit the island with winds of more than 185 mph (296km/h) leaving a trail of extensive and widespread devastation throughout the country. To respond to the emergency and recovery of Sint Maarten, the Government of Netherlands established a Single Donor Trust Fund (SDTF) of a EUR 470 million managed by the World Bank to support the rapid and sustainable recovery of Sint Maarten.

On June 12, 2018, the Steering Committee of the SDTF approved the Sint Maarten Emergency Recovery Project I (ERP I). The Project will address urgent needs resulting from the devastating damages and losses to productive and social sectors, caused by the landfall of Hurricane Irma. The proposed activities of the ERP I represent a diverse and urgent subset of recovery activities, that are reflected in the National Recovery and Resilience Plan (NRRP), aimed to help restore the country to normality as well as establish a basic level of preparedness to improve hurricane readiness.

The ERP I is being prepared and implemented according to Paragraph 12 of the World Bank's Operational Policy on IPF, which allows the deferral of safeguards requirements, if the Bank deems the recipient to be in urgent need of assistance because of a disaster or conflict. The deferral of environmental and social requirements was approved for this Project and the Bank has prepared, an Environmental and Social Action Plan (ESAP) in accordance with its policies. The ESAP is a project-level safeguards planning document that provides a time-bound plan setting forth the steps and sequential planning of project activities and the preparation of the relevant safeguards instruments by the Government of Sint Maarten, to ensure compliance with the safeguards requirements. The ESAP is guided by the dual objective of ensuring that there is a roadmap for safeguards compliance during project implementation and providing clear guidance to the client on the types of actions and instruments required to facilitate speedy implementation of emergency service.

The ESAP includes an Environmental and Social Management Plan (ESMP) and where relevant, Abbreviated Resettlement Action Plans (ARAP) and Hazard/Risk Assessments to be prepared for all identified project activities, and are expected to be completed and made public ahead of the start of the works.

The ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation to eliminate adverse environmental and social impacts, offset them, or reduce them to acceptable levels. The plan also includes the actions needed to implement these measures. Works will not commence prior to the completion and approval of the ESMP and when required the ARAP.

In addition, if project activities could result in temporary involuntary resettlement and/or land acquisition, a Resettlement Policy Framework (RPF) must be in prepared as well to provide guidance on the preparation of specific Abbreviated Resettlement Action Plans (ARAPs) should they be required. All these safeguards documents need to be consulted upon and disclosed prior to the start of works.

This ESMP is an updated¹ version of the Emergency Recovery Project that was first approved in December 17, 2018. This updated version presents detailed guidance for preparing the site-specific Environmental and Social Management Plans and ARAPs where required, and standard environmental and social mitigation risks that can be adopted for the implementation of all small works in the ERP I.

1. The first version of the EMP prepared for the Project is available at <http://documents.worldbank.org/curated/en/347951549363987641/pdf/ESMP-ERP1-final.pdf>

This ESMP consists of the following sections:

- **Section 1: Project Description.** This section summarizes the scope of activities to be carried out under each project component.
- **Section 2: Project Environmental Baseline.** This section describes the existing environmental conditions of the project area.
- **Section 3: Screening of Environmental and Social Impacts and Risks:** This section describes the potential environmental and social impacts and risks associated with the Project activities and the environmental and social safeguards instruments applicable for each component.
- **Section 4: Environmental, Social, Health, and Safety Mitigation Measures.** This section presents environmental and social mitigation measures for project activities with small works, and step-by-step methodology for carrying out specific ESMPs once the site-specific location of works will be defined.
- **Section 5: Stakeholder Consultations Framework.** This section provides guidance for carrying out consultations during the preparation of ESMPs for various works in the Project.
- **Section 6: Project Institutional Framework.** This section describes the Project institutional arrangements for managing the environmental and social safeguards instruments, and capacity building measures to strengthen the environmental and social management capacity of the NRPB.

1 Project Description

1.1 Background of the Project

According to World Bank estimates, the damages and losses related to Hurricane Irma totaled US\$ 2.8 billion. 90 percent of all infrastructure and large parts of the natural environment in the Island were estimated to have been damaged.

Since the Hurricane hit, Sint Maarten has made substantial efforts to address the most urgent needs (e.g. initial debris removal, sheltering roofless populations, resumption of government and business services). Nevertheless, reconstruction and recovery needs are greater than currently identified public and private resources.

1.2 The ERP I

The Government of Sint Maarten (GoSM) has prepared a National Recovery and Resilience Plan (NRRP) outlining the recovery needs across the economy, the community and the Government infrastructure and service delivery of the country. The ERP I was approved on June 12, 2018, as one of the Sint Maarten Recovery Trust Fund projects.

The Project Development Objective of the ERP I is to contribute to such immediate emergency recovery needs and strengthen institutional capacity to manage resilient recovery and reconstruction. The Project will also support the objectives of the NRRP, to restore economic, community and governance infrastructure and service delivery. The activities of this project represent a diverse and urgent subset of recovery interventions that aim to (i) reestablish and improve first responders' operational capacity and repair disaster preparedness facilities; (ii) restore full utility services after Hurricane Irma; (iii) repair housing and repair and reconstruct public buildings; and (iv) establish efficient project management and implementation capacity in the government to carry out the implementation of identified priority interventions according to agreed standards for fiduciary, environmental and social management.

The Project has four main components, detailed description of components and activities can be found in the Project Appraisal Document (PAD), available at <http://projects.worldbank.org/P167339/?lang=en&tab=overview> and at NRPB's website XXXXXXXXXX-insert

The following is a summary of each component:

1.2.1 Component 1. Emergency Measures for the Recovery of Disaster First Responders and Preparedness Facilities

Hurricane Irma left significant damage to the national emergency response and management capacity. Activities of component 1 have been prepared to support improvements to the national emergency early warning, response and disaster preparedness system.

1.2.1.1 Sub-component 1-1. Critical Disaster Preparedness and Response Infrastructure Repairs and Improvements

Emergency Operations Center Repair and Expansion

The national fire and ambulance station, which is also the designated emergency operations center (EOC), sustained significant damage due to Hurricane Irma. Activities of this sub-component will repair damages to the automatic bay door system for fire and ambulance vehicles, damage to interior doors, windows, interior ceilings and other elements of the complex, etc.

In addition, current designs of the fire and ambulance station will be modified to accommodate, for instance, an additional maintenance bay, secure storage for command and maintenance vehicles and other features identified by the Fire Department. The project will, therefore, revise the designs and expand the current EOC building, to expand it to its original capacity. Fiber optic cable and access points will also be installed.

Police Station Repairs

The damages caused by the Hurricane Irma to the head office at Philipsburg and a station at Simpson Bay will be repaired.

Emergency Shelters Repairs

Designated shelters are in urgent need of equipment and repairs to permit their use during the hurricane season. Repairs to shelters will be made to ensure they can continue to function as shelter space. Also, shelters will be provided with water storage facilities, generators where needed, and replacement of food handling equipment where food service is provided.

Reestablishing the Operational Capacity of the National Meteorological Services to Support Disaster Risk Management

The offices of the national meteorological services will be replaced with a new building designed to restore operations and to permit continuous operations during extreme storm events. A new weather station will be installed to replace the damaged unit.

1.2.1.2 Sub-component 1-2. First Responders' Emergency Equipment

Vehicles and equipment will be purchased to support fire and ambulance services and to improve response and operational readiness. National warning and alert system will also be improved. Damaged vehicles will be replaced, and three fire trucks and four ambulances will be purchased under this sub-component. Damaged equipment will be repaired, and satellite phones will be purchased to improve emergency communications. The offices of the national meteorological services suffered significant

damages and are to be replaced with a new building designed to restore MDS operations and permit continuous operations during extreme storm events.

1.2.1.3 Sub-component 1-3. Training and Institutional Strengthening

Training and technical assistance will be conducted under this program and will include incident command, shelter management training, specialized training of emergency medical responders, assistance with the establishment of community-based emergency management committees, etc. Workshops and training, particularly for government officials, will be provided to promote a greater understanding of the national disaster response plan and its implementation.

1.2.2 Component 2. Restoring and Increasing Resilience and Water and Electricity Infrastructure

Activities of component 2 are linked to the priority activities identified in the National Recovery and Resilience Plan (NRRP), which will strengthen water and electricity systems and improve their performance in future disasters. These include: (i) the retroactive financing of eligible restoration and reconstruction activities under the WB guidelines and operational principles; (ii) goods and services ready to be purchased for emergency-related activities to restore water and electricity services; and (iii) investments that can help increase resilience to future hurricanes.

1.2.2.1 Sub-component 2-1. Restoring Electricity Services

Electrical services will be restored, and their performance in future disasters, financing goods, services and works will be improved under this sub-component. Activities include the objectives to (i) accelerate the trenching program to move remaining utilities underground; (ii) repair and upgrade transformers including transformer station houses; (iii) replace and repair street lighting; (iv) repair and replace current electrical meters damaged by Hurricane Irma; and (v) repair, update, expand, construct and increase the resilience of the utility's substations to improve power system performance in situations of disturbance.

1.2.2.2 Sub-component 2-2. Increasing Resilience of the Water System

This sub-component includes the provision of the utility to strengthen the water system's resilience to hurricanes and other climate shocks. Necessary investments will be made to increase its water storage capacity from 0.7 to 2 days. Activities will aim to (i) repair, upgrade, and increase water storage capacity; (ii) repair and replace pump units including pump houses, and (iii) replace and/or improve the resilience of installed micrometers.

1.2.2.3 Sub-component 2-3. Updating GEBE Business Plan

This sub-component includes the provision of utility with the technical assistance required to improve Sint Maarten's Water and Electricity Utility's (Gemeenschappelijk Elektriciteitsbedrijf Bovenwindse Eilanden; GEBE) performance and accountability to the users. Activities in this component include: (i) provision of institutional support; (ii) revision of the planning mechanisms; (iii) provision of technical assistance on the financial, operational, and commercial management; (iv) updating of GEBE's business plan, and (v) feasibility studies and technical designs of key identified investments to be supported.

1.2.3 Component 3. Housing and Public Buildings Repairs and Reconstruction

This component includes activities to repair the extensive and widespread damages to public and private infrastructure resulting from the passage of Irma. Activities include a government-sponsored roof repairs program as well as the design, demolition and simple reconstruction and repairs of damaged public buildings.

1.2.3.1 Sub-component 3-1. Roof Repair Program

In the aftermath of Hurricane Irma, the Government of Sint Maarten established a roof repair program designed to assist persons unable to provide enough resources to conduct their own roof repairs. The program targets repair of the homes of the most vulnerable households. It includes an application process and formal screening procedure to qualify eligible recipients, against a set of administrative, socio-economic and technical criteria in 3 phases.

1.2.3.2 Sub-component 3-2. Emergency Support to Sint Maarten Housing Development Foundation

The Sint Maarten Housing Development Foundation (SMHDF), the main social housing agency serving predominantly vulnerable families, requires financial support to repair severely damaged housing stock used by low-income families. This subcomponent will support the SMHDF to repair its damaged housing stock urgently mainly in the Belvedere housing complex and help in the re-design of a proposed social housing complex.

1.2.3.3 Sub-component 3-3. Public Building Repairs

Four activities are included to advance the rehabilitation of public buildings. These include the preparation of engineering designs for priority buildings, demolition of hazardous buildings, and simple reconstruction works and temporary relocation of selected priority buildings. Simple construction works will be identified and advanced based on government priorities. Several ministries also need to incur costs for temporary relocation of staff and related services from a few public buildings. This sub-component will also support such costs.

1.2.4 Component 4. Support for the Recovery Institutional Arrangements

This component will support the institutional arrangements made by the Government to manage the Trust Fund and implement and coordinate the recovery projects to be financed thereunder. It will support the operational and administrative costs of the institutions in charge of the Trust Fund and the projects. It will also include a capacity building and a sustainable framework to ensure that the accumulated experience also benefits the Government in the long run and after such institutional arrangements are discontinued.

1.2.4.1 Sub-component 4-1. Support to the Interim Recovery Committee

Interim Recovery Committee will be set up and will be made up of a task group within the Ministry of General Affairs which will coordinate the early priority projects, and assist the ministries with the implementation of projects, with regards to the fiduciary and safeguards requirements. This sub-component will support interim operational costs incurred by the IRC while the NRPB is being established.

1.2.4.2 Sub-component 4-2. Support to the National Recovery Program Bureau

National Recovery Program Bureau (NRPB) will be established and will be responsible for the preparation, coordination, execution and evaluation of the projects in close coordination with the Ministries. NRPB will also manage the World Bank Trust Fund and implement the projects financed under the recovery program. The Bureau will be established as an independent administrative agency (in Dutch: a 'Zelfstandig Bestuursorgaan' - CoM approval on 15 February 2018) under a national ordinance.

This sub-component will support the NRPB costs of fulfilling its mandate and responsibilities management of the NRPB, including: (i) the costs of the staff as per the Staffing Plan (e.g. Director, Senior Program Managers, Project Managers, specialists in financial management, procurement, and monitoring and evaluation; technical temporary staff needed during the Program implementation; (iii) the carrying out of

Project audits; (iv) the financing of the necessary goods and equipment; (v) lease of office premises; (vi) trips and transportation; and (vii) communication and reporting.

1.2.4.3 Sub-component 4-3. Emergency Financial Protection Measures

This component would enable Sint Maarten to access sovereign catastrophe risk insurance offered by CCRIF SPC. The Caribbean Catastrophic Risk Insurance Facility (CCRIF) which will provide payouts within 14 days in case of an eligible catastrophic event, improving the country's resilience. The project would finance the participation fee to join CCRIF SPC and 100% of the insurance premiums for two years. As a new member country, Sint Maarten would have the choice of selecting the amount of insurance coverage per peril (earthquake, excess rainfall and tropical cyclone), depending on country risk profile and priority needs.

1.3 Cost of the Project and Implementation Schedule

Cost of each component has been allocated as shown in Table 1-1.

Table 1.1. Summary Cost and Financing Table

Component	USD\$ (Million)	Source
Total - Component 1. Emergency Measures for the Recovery of Disaster First Responders and Preparedness Facilities	14.75	<i>Trust Fund</i>
<i>1.1 Critical Disaster Management and First Responders' Infrastructure Repairs and Improvements</i>	5.90	
<i>1.2 First Responders' Emergency Equipment and Priority Vehicles</i>	8.10	
<i>1.3 Training and Institutional Strengthening</i>	0.75	
Total - Component 2. Restore Public Utility Services after Hurricane Irma	11.6	<i>Trust Fund</i>
<i>2.1 Restoring Electricity Services</i>	3.1	
<i>2.2 Restoring and Increasing Water Storage Capacity</i>	7.9	
<i>2.3 Updating GEBE Business Plan</i>	0.6	
Total - Component 3. Housing and Public Buildings Repair and Reconstruction	19.85	<i>Trust Fund</i>
<i>3.1 Roof Repair Program</i>	7.0	
<i>3.2 Emergency Support to Sint Maarten Housing Development Foundation</i>	5.0	
<i>3.3 Public Buildings Recovery</i>	7.85	
Total - Component 4. Support to the Recovery Institutional Arrangements	9.0	<i>Trust Fund</i>
<i>4.1 Support to the Interim Recovery Bureau</i>	0.5	
<i>4.2 Support to the National Recovery Program Bureau</i>	5.5	
<i>4.3 Sovereign Parametric Financial Protection Measures</i>	3.0	
Project Total	55.2	

2 Project Environmental Baseline

2.1 Physiography

Sint Maarten is an island country in the Leeward Islands of the Caribbean. It is a constituent country of the Kingdom of the Netherlands. It encompasses the southern 40% of the Caribbean island of Saint Martin, while the northern 60% of the island constitutes the French overseas territory of Saint Martin. Sint Maarten is centred on 18° 01'N Latitude and 63° 05' W Longitude. The island hinges between the Lesser and the Greater Antilles and lies between the Atlantic Ocean and the Caribbean Sea. Other neighboring

island territories include Anguilla, St. Kitts and Nevis and St. Barthélemy. The total land area of the entire island is 90 km² (15km long and 13 km wide at its widest point). The island features a series of jagged ranges of hills from north to south terminating at Pic Paradis, 424 m the highest point, on the French side of the island. The coastline is a series of beaches, coastal lagoons, rocky areas and mangroves, and the interior is characterized by many valleys, most of which are rather flat.

2.2 Climate

The climate of Sint Maarten is tropical with hot and sunny weather all year around. Daily average temperature ranges from 25 degrees Celsius (°C) in the period from January to March, to 28 °C between June and October. The night temperature rarely drops below 20 °C, while sometimes it can reach 35/37 °C during the day, from June to November. Average monthly weather data of Sint Maarten is given in Table 2-1.

Average annual rainfall is 1045 mm. In the period from June to November (but mostly from August to October), Sint Maarten can be hit by tropical depressions and hurricanes, as happens in general in the Caribbean.

Table 2.1: Average Monthly Weather Data of Sint Maarten

Month	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Temperature, Min (°C)	22	22	23	23	24	25	25	25	26	25	24	23
Temperature, Max (°C)	28	27	28	28	29	30	30	31	31	30	29	28
Rainfall, (mm)	75	50	45	80	100	70	85	115	120	100	115	90

2.3 Natural Hazards

Sint Maarten is highly vulnerable to natural disasters and adverse climatic events due to its location within the Atlantic hurricane zone. For the past decades, the country has been exposed to high winds and numerous hurricanes, including notably intense storms: Donna in 1960 (Category 3), Luis in 1995 (Category 4), and Irma 2017 (Category 5 on Saffir-Simpson scale). Due to the size of the country, a single storm has the potential to impact the entire population directly. High winds, rainfall and flooding, are the principal risk factors while the country is also vulnerable to earthquakes. Coastal areas are exposed to flood risk from storm surge and tsunamis. Increased urbanization along with climate change and limited country capacity to build with resilience adds to its vulnerability to natural hazards.

2.4 Biological Environment

The major part of Saint Maarten is covered with secondary vegetation derived from either seasonal formations or dry evergreen formations². Only on the top of the hills, some more or less original semi-evergreen seasonal forest is found. This type of forest has regionally become extremely rare too. Because of its small area, this forest formation is very vulnerable. On the higher hills of the two ridges in the middle part of the island, and the hills of the eastern ridge, dense secondary woodland vegetation is growing, preventing erosion and with a high scenic value. Along the coast and inland waterways remains of mangrove forests and other types of coastal vegetation survive, which are of high ecological value, and have scenic value.

2. Source: Biological Inventory of St. Maarten (<http://www.dcbd.nl/sites/www.dcbd.nl/files/documents/RojerKNAP96-33BioInv-StMaarten%5Beng%5D.pdf>)

The fauna of St. Maarten is poor in species, not only because of St. Maarten’s small size, but also because of habitat destruction, hunting, imported predators and hurricanes. One bird species, the Red-tailed Hawk (*Buteo Jamaicans*), and two kinds of reptiles, the Antillean Iguana and Iguana delicatissima. Among the vertebrates, birds form the largest group with a total of 39 resident and nesting birds and 68 species of migrating birds and visitors. These include 19 seabirds, of which 10 species breed in or near the island. Sint Maarten is classified as an important breeding area for seabirds. Several small rocky islands just offshore accommodate breeding colonies of seabirds.

2.5 Demography and Socio-economy

Sint Maarten is a high-income constituent country of the Kingdom of the Netherlands in the Caribbean. It is the most densely populated country in the Caribbean with a population of roughly 38,000 in an area of 34 square km and a per capita Gross Domestic Product (GDP) of U\$25,381. English is the widely spoken language though Dutch is the official language of the country. There is immigration from neighbouring caribbean countries.

Tourism and the tourism-related industry is the major source of employment in the country. Only about 10 % of the land is suitable for domestic agricultural production, and over 90% of food products are imported. Nearly 30% of the male working population (45% for female workers) earn less than ANG 2,000 (USD 1200) per month. Literacy rate in people over the age of 14 is 95.8%.

The hurricane Irma has severely damaged the economy of the country. Sint Maarten’s low unemployment rate (6.2 percent) and youth unemployment rate (23.8 percent) in 2017 have significantly risen following the hurricane due to the shutting down of tourism businesses. The tourism sector suffered from significant damages to the airport, accommodations, and tour operator equipment, dramatically reducing the number of tourist arrivals. Micro, small, and medium-sized enterprises have experienced a significant loss of capital due to the impacts of the hurricane.

2.6 Current Conditions of Affected People

Census and socioeconomic survey of project affected people are being carried out to determine the specific current conditions of beneficiaries of the project. The information currently available specifically to the roof repair project highlights that the majority of the beneficiaries of the projects are elderly and have limited means for repairing the damage caused by hurricane Irma.

3 Screening of Potential Risks and Impacts of the Project

3.1 Applicable World Bank Environmental and Social Safeguards Policies to the Project

Applicable World Bank policies for the proposed investments under the Project are given in Table 3-1.

Table 3.1: Applicable World Bank Policies for the Project

<i>Project Components and Activities with Potential Negative Environment and Social Risks Impacts</i>	<i>Indicative Activities and Environment and Social Policies Triggered</i>
Component 1. Emergency Measures for the Recovery of Disaster First Responders and Preparedness Facilities (USD 14.75 million)	
<i>Sub-component 1.1. Critical Disasters First Responder Infrastructure Repairs and Improvements (USD 5.90 million)</i>	OP 4.01. Repairs and upgrades on same sites.

Project Components and Activities with Potential Negative Environment and Social Risks Impacts	Indicative Activities and Environment and Social Policies Triggered
This subcomponent will support improvements to the national emergency response and disaster preparedness system. It includes repair of critical public facilities and repair and purchase of equipment at four national agencies (namely the police, the fire service, the ambulance service and the meteorological service), and repairs of designated emergency shelters and schools.	OP 4.12. Possible economic displacement
Sub-component 1.2. First Responders' Emergency Equipment (USD 8.10 million) The sub component will purchase vehicles (including fire trucks, ambulances, support vehicles, and an evacuation bus) and related equipment, and repairs to damaged equipment. Additionally, communication equipment, including satellite phones, to improve the Recipient's emergency communications network is foreseen. Apart from supporting emergency services, priority vehicles will be provided to TEATT, and replacement support vehicles will be purchased for VSA and VROMI.	None
Sub-component 1.3. Training and Institutional Strengthening (USD 750,000) Training and technical assistance will be conducted under this program, which will include incident command, shelter management training, specialized training of emergency medical responders, assistance with the establishment of community-based emergency management committees – with active participation of women – and other activities to be determined. Also included is a provision for conducting workshops and training, for government officials, as well as other relevant stakeholders (e.g. civil society) as needed, to promote a greater understanding of the national disaster response plan and its implementation.	None
Component 2: Restore and Increase Resilience of Utilities Services after Hurricane Irma (USD 11.60 million).	
Sub-component 2.1. Restoring Electricity Services (USD 3.10 million) Through this subcomponent the Project will restore electrical services and improve their performance in future disaster events, financing goods, services and works, including retroactive financing to, inter alia: (i) accelerate the trenching program to move remaining utilities underground; (ii) upgrade and construct resilient sub-stations; (iii) repair and upgrade transformers including transformer station houses; (iv) replace and repair street lighting; (v) repair and replace current electrical meters damaged by Hurricane Irma; and (vi) update, expand and increase resilience of the utility's substations to improve the power system performance under diverse disturbance situations.	OP 4.01. Repairs and upgrades on same sites. OP 4.12. Possible limited land acquisition for underground cables and/or economic displacement due to disruption of business activities.
Sub-component 2.2. Increasing Resilience of the Water System (USD 7.90 million) This Subcomponent provides the utility with the necessary investments to increase its water storage capacity to between 2 and 4 days, strengthening the water system's resilience to hurricane and other climate shocks. It will finance goods, services and works, including retroactive financing to, inter alia: (i) repair, upgrade, and increase water storage capacity; (ii) repair and replace pump units including pump houses; and (iii) replace and/or improve resilience of installed micrometers. This component will be executed under the technical oversight of GEBE, but all the fiduciary processes will be carried out by the IRC (and NRPB afterwards).	OP 4.01. ESMP will provide for any interruption for economic activity, if it arises.

Project Components and Activities with Potential Negative Environment and Social Risks Impacts	Indicative Activities and Environment and Social Policies Triggered
<p>Sub-component 2.3. Updating GEBE Business Plan (USD 0.60 million)</p> <p>This Subcomponent provides the utility with the technical assistance to improve GEBE performance and accountability to the users, including, among others: (i) provision of institutional support; (ii) revision of the planning mechanisms; (iii) provision of technical assistance on the financial, operational, and commercial management; (iv) updating of GEBE's business plan; and (v) feasibility studies and technical designs of key identified investments to be supported.</p>	None
<p>Component 3: Housing and Public Buildings Repair and Reconstruction (USD 22.85 million)</p>	
<p>Sub-component 3.1. Roof Repair Program (USD 7.00 million)</p> <p>This sub-component will support quick repairs to roofs of damaged houses. The program targets repairs of the homes of the most vulnerable households selected based on administrative, socio-economic and economic criteria and procedures acceptable to the World Bank, which will be determined at the implementation stage, and included in the Operations Manual.</p>	<p>OP 4.01. OP 4.12. Involuntary Resettlement and temporary relocation. ARAPs and/or compensation notes will be prepared as required. Possible cases of vulnerable persons/elderly/sick persons who may need a special support plan to be moved.</p>
<p>Sub-component 3.2. Support to the Sint Maarten Housing Development Foundation (USD 5.00 million)</p> <p>The St. Maarten Housing Development Foundation (SMHDF), the main social housing agency serving predominantly vulnerable families, requires financial support to repair severely damaged housing stock. This sub-component will support the SMHDF with a direct grant of USD 5.0 million³.</p>	<p>OP 4.01. Environmental Assessment OP 4.12. Involuntary Resettlement and temporary relocation. ARAPs and/or compensation notes will be prepared as required. Maybe cases of vulnerable persons/elderly/sick persons who may need a special support plan to be moved.</p>
<p>Sub-component 3.3. Public Building Repairs (USD10.85 million)</p> <p>A significant number of public buildings were damaged, including some 20 schools as well as sports and community centers, national monuments and some 24 public buildings. This component will support the urgent repairs of high priority facilities, the cost of temporary relocation, and survey and design for some of those buildings that require major renovation or new construction. In some cases, demolition will be required to both clear the way for reconstruction and urgently remove debris hazards. The execution of this sub component is expected to be under the responsibility of IRC/NRPB with technical oversight from VROMI, the ministry managing physical infrastructure on behalf of client ministries such as MECYS, VSA, MGA and others. As reconstruction needs far exceed the budget available under this subcomponent, the government of St. Maarten will provide a prioritized list of those buildings to be addressed under this activity.</p>	<p>OP 4.01. Environmental Assessment OP 4.11. Physical Cultural Resources OP 4.12. Related to reconstruction of public buildings and or new buildings.</p>
<p>Component 4. Institutional Support for Reconstruction (USD 6.0 million)</p>	None

3. The amount in this sub-component will focus on a grant of USD 3.6 million to urgently repair the Foundation's damaged housing stock, finance the construction of a hurricane shelter in the Belvedere housing complex for an estimated USD 1.0 million and provide technical assistance of USD 400,000 to support the redesign of a proposed housing complex.

<i>Project Components and Activities with Potential Negative Environment and Social Risks Impacts</i>	<i>Indicative Activities and Environment and Social Policies Triggered</i>
This component will support the institutional arrangements made by the Government to implement and coordinate the projects to be financed by the Single Donor Trust Fund (SDTF). It will support the operational and administrative costs of the institutions in charge of the SDTF and the projects. It will also include capacity building and a sustainable framework to ensure that the accumulated experience also benefits the Government in the long run and after such institutional arrangements are discontinued.	

3.2 Environmental and Social Risk Classification

In accordance with Bank’s environmental safeguards guidance, the NRP1 Project has been classified as Category B.

The project’s overall potential socio-environmental impacts are expected be positive for the affected communities. Works proposed under the project are largely rehabilitation and retrofitting of selected infrastructure and public buildings, and impacts are generally associated with the actual construction phase of the works activities. Limited new constructions will be included such as water supply improvements, as well new building expansions on sites located within already designated compounds (e.g. existing fire and rescue property), buried utilities, and small works to field locations such as pump houses and transformer stations. Transformer stations to be replaced are mineral oil transformers as all PCB transformers were cycled out of service some time ago.

Regarding potential social risks, the key issues that have been identified include: (i) worker safety in the construction activities and homeowner protections under the voluntary roofing assistance program; and (ii) temporary involuntary relocation of tenants, which has been identified as an issue associated with repairs to both the public housing managed by the Sint Maarten Housing Development Foundation (SMHDF) and the government led roof repair programme.

Following the World Bank guidelines, the Project’s environmental and social risk has been rated Substantial (S). While the activities that entail social and environmental risks will be site specific and will focus on the rehabilitation of damaged infrastructure including utilities assets, private housing and public buildings, the project has been prepared under condensed procedures in a post-hurricane environment; where the Government of Sint Maarten is new to the management of environmental and social safeguards following World Bank guidelines. As such, there is a substantial risk for noncompliance.

3.3 ERP I Environmental and Social Management Plan

To help manage the environmental and social risks, NRPB has designed the ESMP for the project consisting of guidelines for the preparation of standard mitigation of environmental and social risks for those activities with **small** and **minor works** involved, and steps for preparing **specific ESMPs** for those activities where **major works will entail significant risks**. For those activities whose sites are yet to be defined, the significance of risks and impacts will need to be re-assessed and if specific ESMPs are deemed necessary, they will need to be consulted and publicly released before the initiation of the works. For the definition of scope of works, NRPB will adopt the following:

- **Major Works where temporary/permanent resettlement might also be required:** Activities with major environmental and social risks associated with major construction works/new buildings/lots of houses, and where temporary or permanent resettlement is required. In these

cases, the environmental and social screening (see table 3.3) will help prepare standalone ESMPs with specific environmental and social mitigation measures adjusted to the works locations. Standalone ESMPs will be prepared to address all the identified potential environmental and social impacts and risks following the principles of the mitigation hierarchy. To the extent feasible, all potential impacts and risks will be avoided through design changes, and if avoidance is not possible – measures will be taken to minimize the magnitude of the impacts. Mitigation measures will be proposed for all the significant impacts. If the residual impacts are still significant even after applying the mitigation measures, compensation measures will be proposed. Further, enhancement measures will be proposed for increasing the benefits of positive impacts. Table 3-2 lists the activities where major works are expected and where site-specific ESMPs and ARAPs will be prepared once the location of these works is defined. **At the time of the preparation of this revised version of ESMP it is expected that the Repair of Social Homes SMHDF – Phase 2 will be the only activity requiring an specific ESMP.**

- **Minor Works where Temporary Resettlement is required:** Activities involving minor repairs in buildings or homes (e.g. roof repairs), where temporary resettlement is required. Generic environmental and social mitigation measures defined in this ESMP will be applied.
- **Minor repairs:** works with minor environmental and social risks (e.g. windows and doors replacements) **where temporary resettlement is not needed/desired.** Generic environmental and social mitigation measures defined in this ESMP will be applied.

An environmental and social monitoring plan will also be prepared for each ESMP to monitor the effectiveness of the mitigation measures and compliance with the environmental and social standards.

Table 3.2. Environmental Safeguards Instruments Required for the Project

Component	Project Component	Applicable Instrument
Sub-component 1.1	Repair of Police Station	- Standard Environmental and Social Mitigation Measures
Sub-component 1.1	Emergency Operation Center, EOC	- Standard Environmental and Social Mitigation Measures
Sub-component 1.1	Repair and Construction of Meteorological Buildings	- Standard Environmental and Social Mitigation Measures
Sub-component 1.1	Repair of Shelters	- Standard Environmental and Social Mitigation Measures
Sub-component 2.1	<ul style="list-style-type: none"> - Upgrade and construction of resilient sub-stations - Repair and upgrade transformers, including transformer station houses - Replace and repair street lighting - Repair and replace currently damaged electrical meters - Update and expand the utility's substations 	- Standard Environmental and Social Mitigation Measures
Sub-component 2.2	<ul style="list-style-type: none"> - Repair and upgrade water storage capacity - Repair and replace pump units, including pump houses - Replace installed micrometers 	- Standard Environmental and Social Mitigation Measures

Component	Project Component	Applicable Instrument
Sub-component 3.1	Repair of Private Homes Phase 1 – 14 house Roof (Home) Repairs	- Standard Environmental and Social Mitigation Measures - Abbreviated Resettlement Action Plan
	Repair of Private Homes Phase 2 – Roof (Home) Repairs	- Standard Environmental and Social Mitigation Measures - Abbreviated Resettlement Action Plans
	Repairs of Private Homes/minor repairs (NEW: windows and doors)	- Standard Environmental and Social Mitigation Measures
Sub-component 3.2	Repair of Social Homes SMHDF – Phase 1 (minor repairs)	- Standard Environmental Mitigation Measures
Sub-component 3.2	Repair of Social Homes SMHDF – Phase 2	- Standalone Environmental and Social Mitigation Measures - Abbreviated Resettlement Action Plans
Sub-component 3.3	Repair of Schools	- Standard Environmental and Social Mitigation Measures

3.4 Environmental and Social Screening

As a first step to assessing the activities, environmental and social screening will be carried out before each sub-component.

The environmental and social screening may be used to identify whether:

- the environmental and social risks of the works are major;
- the environmental and social risks of the works are minor;
- temporary resettlement is required for the project affected people (PAPs).
- temporary resettlement is not required for the project affected people (PAPs);
- wheterh there is economic displacement (loss of livelihoods)

Screening checklist in Table 3-3 for environment and Table 3-4 for social will be used. Results of the environmental and social screening may be used as justifications behind the decisions on the project classification. NRPB will decide on the project classification in consultation with the WB.

Table 3.3. Environmental Screening Matrix⁴

Screening Questions	Yes/No/? Briefly describe	Is this likely to result in a significant effect? Yes/No/? – Why?
1. Will construction, operation or decommissioning of the proposed works involve actions which will cause physical changes in the locality (topography, land use, changes in water bodies, etc.)?		
2. Will construction or operation of the proposed works use natural resources such as land, water, materials or energy, especially any resources which are non-renewable or in short supply?		

4. The screening checklist is developed by European Commission and is available at <http://ec.europa.eu/environment/archives/eia/eia-guidelines/g-screening-full-text.pdf>

Screening Questions	Yes/No/? Briefly describe	Is this likely to result in a significant effect? Yes/No/? – Why?
3. Will the works involve use, storage, transport, handling or production of substances or materials which could be harmful to human health or the environment or raise concerns about actual or perceived risks to human health?		
4. Will the proposed works produce solid wastes during construction or operation or decommissioning?		
5. Will the proposed works release pollutants or any hazardous, toxic or noxious substances to air?		
6. Will the proposed works cause noise and vibration or release of light, heat energy or electromagnetic radiation?		
7. Will the proposed works lead to risks of contamination of land or water from releases of pollutants onto the ground or into surface waters, groundwater, coastal waters or the sea?		
8. Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?		
9. Are there any other factors which should be considered such as consequential development which could lead to environmental effects or the potential for cumulative impacts with other existing or planned activities in the locality?		
10. Are there any areas on or around the location which are protected under international or national or local legislation for their ecological, landscape, cultural or other value, which could be affected by the project?		
11. Are there any other areas on or around the location which are important or sensitive for reasons of their ecology, e.g. wetlands, watercourses or other water bodies, the coastal zone, mountains, forests or woodlands, which could be affected by the project?		
12. Are there any areas on or around the location which are used by protected, important or sensitive species of fauna or flora, e.g. for breeding, nesting, foraging, resting, overwintering, migration, which could be affected by the project?		
13. Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?		
14. Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project?		
15. Are there any routes or facilities on or around the location which are used by the public for access to recreation or other facilities, which could be affected by the project?		
16. Are there any transport routes on or around the location which are susceptible to congestion or which cause environmental problems, which could be affected by the project?		
17. Is the project in a location where it is likely to be highly visible to many people?		
18. Are there any areas or features of historic or cultural importance on or around the location which could be affected by the project?		
19. Is the project located in a previously undeveloped area where there will be loss of greenfield land?		
21. Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public		

Screening Questions	Yes/No/? Briefly describe	Is this likely to result in a significant effect? Yes/No/? – Why?
open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project?		
20. Are there any plans for future land uses on or around the location which could be affected by the project?		
21. Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project?		
22. Are there any areas on or around the location which are occupied by sensitive land uses e.g. hospitals, schools, places of worship, community facilities, which could be affected by the project?		
23. Are there any areas on or around the location which contain important, high quality or scarce resources e.g. groundwater, surface waters, forestry, agriculture, fisheries, tourism, minerals, which could be affected by the project?		
24. Are there any areas on or around the location which are already subject to pollution or environmental damage e.g. where existing legal environmental standards are exceeded, which could be affected by the project?		
25. Is the project location susceptible to subsidence, landslides, erosion, flooding or extreme or adverse climatic conditions which could cause the works to require additional environmental considerations?		
26. Will pesticides, rodenticides or any other vector control products will be used during any stage of project implementation and operation?		
<p>Note: Instructions to complete the checklist</p> <p>Start by providing a brief description of the project. Then using available information about the project answer each question in Column 2:</p> <ul style="list-style-type: none"> • Yes – if the answer is yes • No – if the answer is no • ? – if the answer is don't know <p>Briefly describe the relevant characteristic of the project or its environment and then consider whether any effect that is likely to result is likely to be significant and enter the response in Column 3 with a note of the reasons why. Use the next Checklist on Criteria for Evaluating Significance to help answer the question "Is this likely to result in a significant effect?".</p>		

Table 3.4. Social Screening Matrix

Will the sub-project:	Yes	No	Is this likely to have a significant effect and why?
Involuntary Resettlement Impacts			
Do the works require temporary displacement of people from their current settlement?			
Will any of the proposed works impact on the livelihoods of project affected persons and result in economic displacement/Loss of livelihood and/or stream of income?			
Will the work interfere with the normal health and safety of the worker/employee?			
Will the work reduce the employment opportunities for the surrounding communities?			

Will the work cause limits to people's access to the water, public services or other resources that they depend on?			
Will there be a reduction in income for the local communities?			
Will the work induce conflict?			
Community Health and Safety			
Is there a possibility to cause child delinquency (school drop-outs, child abuse, child labour, etc.)?			
Will the work cause labour influx to the area?			
Will the project lead to gender disparity or gender based violence?			
Will there be an increased exposure of the community to communicable diseases such as HIV/AIDS?			
Will there be an increased insecurity due to introduction of the project?			
Will the work lead to substance abuse (drug abuse, excessive alcohol consumption, etc.)?			
Is there a vulnerable population affected (children, disabled, elderly, minority group etc.) requiring temporary resettlement?			
If yes to any of the above please document the context and describe the situation and coordinate with NRPB Environmental/Social Policy Officer for more guidance.			
Labor Issues			
Are there potential hazards to the workers?			
Are the proper PPEs provided to the workers?			
Are there procedures incorporated that can be used in emergency situations?			
If yes to any of the above please document the context and describe the situation and coordinate with NRPB Environmental/Social Policy Officer for more guidance.			

3.5 Environmental and Social Risks Screening of Minor Works

NRPB carried out an environmental and social risk screening for the construction of minor works to be carried out under the different project components and the potential environmental and social negative impacts. For details please refer to Table 3-5. The environmental and social risk screening helped identified the environmental and social mitigation measures described in Table 4.1 (next section).

Table 3.5. Summary of Screening of Potential Environmental, Social, Health and Safety Risks from Construction Works (Small Works and Minor Repairs)

Component/Activities with Potential Environmental and Social Impacts	Scope of works	Potential Environmental and Social Impacts and Risks
<p>Component 1: Emergency Measures for the Recovery of Disaster First Respondents and Preparedness Facilities</p> <ul style="list-style-type: none"> - Emergency Operations Center Repair and Expansion - Police Station Repairs - Emergency Shelters Repairs - National Meteorological Services Building/Weather Station 	<p>Removal of Damaged Parts of the Buildings. Damaged parts of buildings such as interior ceilings, walls, doors and windows will be removed or demolished and transported to the Government-designated Hurricane Irma debris disposal site.</p> <p>Minor Mold Remediation. Small scale mold remediation works may be needed through cleaning of affected material or removal of the affected material.</p> <p>Repair of Damaged Parts of the Buildings. The damaged parts of the buildings will be reconstructed with concrete, and doors and windows will be replaced.</p> <p>Construction of Additional Rooms, Bays and Buildings. Additional rooms and buildings will be constructed as needed in the existing premises of the affected buildings. No additional land acquisition will be required for these construction activities.</p>	<p>Debris and Waste Generation. Debris and other waste material will be generated from the demolition and cleanup activities.</p> <p>Occupational Health and Safety (OHS) Risks. OHS risks are associated with debris collection and removal activities such as lifting, separating, sweeping and hauling; and other risks generally associated with the building construction works including use of scaffolding and work at heights.</p> <p>Community Health and Safety Risks. Staff working in these offices are exposed to risks associated with construction activities. Small scale mold remediation works may have an impact on infants and people with respiratory diseases.</p> <p>Community also needs to be protected from any potential GBV/SEA.</p> <p>Nuisance from the Construction Activities. Noise and vibration, dust and vehicular movement from the construction activities may cause a nuisance to the nearby communities, staff working in the offices and construction workers.</p>

Component/Activities with Potential Environmental and Social Impacts	Scope of works	Potential Environmental and Social Impacts and Risks
<p>Component 2: Restoring and Increasing Resilience and Water and Electricity Infrastructure</p> <ul style="list-style-type: none"> - Restoring Electricity Services - Increasing Resilience of the Water System 	<p>Trenches and Excavation. Excavation of trenches for repair or relocation of water pipes, electrical cables and other utilities. Utilities within the trenches that could be disturbed by construction will need to be relocated.</p> <p>Repairing of Electrical Lines. Repair or replacement of damaged electric lines including re-erection of damaged poles and installation of street lights.</p> <p>Repair of Electrical Equipment. Repair or replacement of transformers, and pumping equipment of the water supply system.</p>	<p>Traffic Congestion. Excavations and trenches along the roads may affect the smooth traffic flow and may cause traffic jams.</p> <p>Occupational Health and Safety (OHS) Risk. OHS risks and hazards associated with the repair of electrical lines and electrical equipment (e.g. transformers).</p> <p>Community Health and Safety Risks. Pedestrians are exposed to the risk of falling into the roadside excavations and trenches.</p> <p>Nuisance from the Construction Activities. Noise and vibration, dust and vehicular movement from the construction activities may cause a nuisance to the nearby communities.</p>
<p>Component 3: Housing and Public Buildings Repairs and Reconstruction</p> <ul style="list-style-type: none"> - Roof Repair Program - Repair of Sint Maarten Housing Development Foundation (SMHDF) Houses - Repair of Schools and Other Public Buildings 	<p>Temporary Relocation of Household Members. Families living in the houses need to be temporarily relocated, for about two months, before starting of the construction activities.</p> <p>Demolition of Damaged Roofs and Structures. Damaged parts of buildings such as roofs, walls, doors and windows will be demolished and transported to the Government-designated Hurricane Irma debris disposal site.</p> <p>Roof Inspection and Repair. Roofs will be inspected, and damaged roofs will be replaced with the appropriate roofing material at the required resilience standards.</p> <p>Mold Remediation. Mold remediation may be needed in some of the buildings that were exposed to rainwater.</p> <p>Concrete and Steel Work. Structural elements of the buildings will be inspected, and the necessary concrete works will be carried out to strengthen the building structures.</p>	<p>Relocation of Affected Households. Displacement of people is one of the major issues brought forth after the passing of hurricane Irma and Maria. Displacements affect the livelihood of people, rendering them homeless. Relocations can be traumatic and depressive causing emotional and mental distress to some of the families, especially considering that they have been living in these homes for a long time</p> <p>Occupational Health and Safety (OHS) Risk. OHS risks are associated with building demolition works and debris collection and removal activities, and other risks generally associated with the building construction works including the use of scaffolding and work at heights.</p> <p>Community Health and Safety Risks. Communities living around the construction sites are exposed to risks associated with construction activities. Mold</p>

Component/Activities with Potential Environmental and Social Impacts	Scope of works	Potential Environmental and Social Impacts and Risks
	<p>Mobilization of Materials, Workers, and Equipment. Stack yards, site offices and labor sheds will need to be built. The land and premises required will be rented. No land acquisition will be required.</p>	<p>remediation works may pose health risks to the infants and persons recovering from surgery, immune suppressed people, or people with chronic inflammatory lung diseases (e.g., asthma, hypersensitivity pneumonitis, and severe allergies).</p> <p>Nuisance from the Construction Activities. Noise and vibration, dust and vehicular movement from the construction activities may cause a nuisance to the nearby communities, staff working in the offices and construction workers.</p> <p>Traffic and Road Safety. Construction related to vehicular movement and temporary storage of construction materials on the streets may affect the local traffic.</p>

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4 Environmental and Social Mitigation Measures

The project is considered Category “B” and OP 4.01 is triggered for sub-components 1.1, 2.1 and 2.2 and all of Component 3. The bulk of the work is expected to be of relatively small scale, generating localized environmental and social impacts that can be easily identified, and well mitigated, and managed. Overall, these environmental and social impacts are mostly associated with the construction phase of the rehabilitation works, and include inter alia debris management, worker health and safety, noise control, and soil erosion. Consequently, no significant or irreversible environmental and social impacts are anticipated due to Project-financed activities.

Following the environmental and social screening and the classification of works presented in previous section, the applicable environmental and social legal framework for Sint Maarten, and the applicable World Bank Environmental and Social Safeguards Policies, NRPB defined two sets of Environmental, Social, Health, and Safety (ESHS) mitigation measures. The first is a set of measures applicable to activities involving works with minor E&S risks; the second is a guideline for defining mitigation measures when works with major E&S risks will be implemented once sites and implementation arrangements are defined. NRPB developed the following checklist of instruments to be applied according to the scope of works under each Activity:

Checklist of Required Environmental and Social Instruments based on scope of works

	Minor Repairs	Minor Works with no Temporary Resettlement (TR) needed	Minor Works with TR needed	Major Work with TR needed
<i>Environmental and Social Risks</i>	Low		Substantial-High	
ESHS Requirements in Bidding Documents (all procurement documents, see sub-section 4.1)	yes	yes	yes	yes
<i>ESHS Risk Mitigation Measures for Minor works/minor repairs Works see (sub-section 4.2)</i>	yes	yes	Not applicable	Not applicable
Specific ESMPs for Major Works (see sub-section 4.3)	Not applicable	Not applicable	Not applicable	Yes Specific measures after risk screening
<i>Temporary Resettlement (and Abbreviated Resettlement Action Plan needed) (see sub section 4.4)</i>	Not required	Not Required	Required	Required
<i>Grievance Redress Mechanism, all procurement documents (see sub-section 4.5)</i>	yes	yes	yes	yes

A set of guidelines has also been developed for works requiring temporary resettlement of the PAPs from the project sites. Annex 1 contains applicable GoSM Regulations and World Bank Operational Policies and Guidelines.

The NRBP Environment Policy Officer and the Social Safeguards Officer will be responsible for supervising the implementation of the Environment, Social, Health, and Safety mitigation measures for minor works/ minor repairs.

For activities with major works, NRPB will request designated ESHS Focal Points for each contract to take responsibility of implementing all actions pertaining the implementation of specific ESMPs; and together with NRPB Environmental and Social safeguards Officers, ensure compliances of ESHS mitigation measures during project implementation. The Contractor shall designate a senior site supervisor as ESHS Focal Point for taking responsibility of implementing actions in the ESMP and communicating with the Supervision firm and the NRPB Environmental and Social Safeguards Officers on ESHS matters.

4.1 ESHS Requirements in Bidding Documents

To address the expected environment and social risks in the implementation of works, NRPB will include ESHS measures in the respective bidding documents. The Environmental Safeguards Officer in coordination with the Social Safeguards Officer of NRPB will work with the Procurement Specialists of the Project on ensuring the following guidance is incorporated accordingly.

- All sections of bidding documents are to be reviewed in detailed and cross-reference will need to be made to the environmental and social safeguards policies and instruments relevant to the specific subprojects which have been prepared as per the requirements of this ESMP.
- Inclusion of Environmental, Social, Health and Safety (ESHS) Requirements as technical specifications, including the need for the Contractors ESHS staff and Code of Conduct for activities with major works.
- Where required, the Environmental and Social Safeguards Officers may be required to update recommendations in the respective bidding documents to match the language in the Bid Document where major discrepancies have been noted to facilitate consistency in all documents.
- The inclusion of Environmental, Social, Health, and Safety Performance (if deemed necessary) in the contract documents.

4.2 ESHS Risk Mitigation Measures for Minor Repairs

For minor repairs, the Environmental and Social Safeguards Officers will adjust when necessary and incorporate the standard mitigation measures indicated in Table 4-1 in the corresponding bidding documents, requests for quotes, draft contracts, and ensure provisions are included in the final contracts signed for the construction of works. The standard mitigation measures are based on the relevant policies of GoSM, the World Bank Safeguards Policies and World Bank Group Environmental, Health, and Safety Guidelines, and how they have been considered while designing the Project and preparing this ESMP.

Table 4.1. Standard ESHS Mitigation Measures for Minor Works/Minor Repairs

[Note: This Standard Environmental and Social Mitigation Measures will apply to all minor works/minor repairs contracts to be implemented under the Project. Standalone ESMPs will be prepared for moderate and major work contracts.]

ESHS Risks/Impact/Activity	Description of the Risk/Impact	Mitigation Measures	Responsibility	
			Implementation	Supervision
Community health and safety	Community exposure to construction risks	The Contractor shall: <ul style="list-style-type: none"> - Establish a perimeter of the site to secure from unauthorized access during construction based on the work requirements. - Sign a 'code of conduct' with all its staff before mobilizing them into the construction. The code of conduct will include the responsibilities of the workers in dealing with the local community and following the instruction from the supervisor. - Share a GBV/SEA Hotline/Contact for GBV Redress 	Contractor	NRPB
Hazards at Work Site	Occupational health safety risks associated with the proposed construction works may result from the exposure to potential hazards encountered in the workplace or while working	The Contractor with the support of the NRPB and the Supervision consultant shall: <ul style="list-style-type: none"> - Identify the potential hazards at worksites associated with the construction activity - Implement necessary control measures to mitigate the risks associated with the potential hazards. - 	Contractor	NRPB
Asbestos	Contamination of clothing and inadvertent transport of asbestos	If in the event a construction project requires the stabilization or removal of asbestos construction materials, the contractor shall contact the Public Health Department of the Department of Health and the Solid Waste Management Division of the VROMI, and develop an asbestos management plan. Respiratory protection together with measures to prevent the contamination of clothing and inadvertent transport of asbestos fiber off-site shall be provided to exposed workers.	Contractor	NRPB

ESHS Risks/Impact/Activity	Description of the Risk/Impact	Mitigation Measures	Responsibility	
			Implementation	Supervision
Occupational risks at work sites	Lack of awareness among workers on the ESHS risks and requirements of the Project	The NRPB and its supervision consultant shall provide ESHS awareness session to Contractors, before they start working on site, on primary ESHS risks associated with the proposed construction works; and the workers' responsibility. The Contractor shall ensure all its workers have attended the ESHS awareness session provided by the Engineer.	NRPB	Contractor
Personal Protective Equipment (PPEs) and First Aid Kits	Lack of relevant PPEs will increase the risk of worker's exposure to construction hazards Lack of First Aid Kits may aggravate possible minor wounds	Contractor shall provide personal protection equipment (PPE) for workers, such as safety boots, helmets, masks, gloves, protective clothing, goggles, body harness, and ear protection based on the work requirements, as well as First Aid Kits to address immediate/minor healing needs	Contractor	NRPB
Building demolition works	Hazards from falling debris and objects	<ul style="list-style-type: none"> - Remove or secure objects (glass, structural members) that may fall while workers work under them - Use debris netting, sidewalk sheds, canopies, or catch platforms to reduce hazards from falling objects - Verify the location of all other utility lines; ensure lines have been shut-off, capped, or otherwise controlled outside the building before beginning work - Notify utility companies before controlling their utility lines 	Contractor	NRPB

ESHS Risks/Impact/Activity	Description of the Risk/Impact	Mitigation Measures	Responsibility	
			Implementation	Supervision
Working at heights	Risk of fall from improper ladder and scaffold use	<ul style="list-style-type: none"> - Inspect ladders for cracked, broken, or defective parts before use - Do not exceed the load rating of ladders or scaffolds-remember that load ratings include people, tools, and equipment - Set up ladders and scaffolds on stable surfaces - Use non-conductive ladders (e.g., fiberglass) and exercise extreme caution when working near power lines - Secure ladders that can be displaced by work activities; consider barricades at the base to keep traffic away - Ensure that the scaffold is built on firm foundations. Footings should be able to support the scaffold without settling or moving. Do not use unstable objects to support scaffolds - Fully plank each scaffold on all working levels. For wood planking, use wood graded for the intended load - Provide guardrails or fall protection systems on platforms 2m or higher 	Contractor	NRPB
Working with the electrical lines and live electrical equipment	Risk of electrical shocks while working with the electrical lines, transformers and other electrical equipment	<ul style="list-style-type: none"> - Assume that electrical lines are energized until proven otherwise; lines may become energized because of back feed from portable generator use, circuit ties/switch point, lightning, or other downstream events; ensure that grounding procedures are accomplished and that all sources of electricity are isolated - Inspect the work area for downed conductors and do not go near, drive over, or otherwise come in contact with them - Downed electrical conductors can energize other objects, including fences, water pipes, bushes, trees, and telephone/ fiber optic cables - Ensure that all workers assessing and repairing electrical installations are experienced - Use electrical-specific PPE (gloves, face shields) needed based on the type and approximate voltage of service - Unless deenergized and visibly grounded, maintain proper distance from overhead electrical power lines (at least 3 m) and/or provide insulating barriers 	Contractor	NRPB

ESHS Risks/Impact/ Activity	Description of the Risk/Impact	Mitigation Measures	Responsibility	
			Implementation	Supervision
Trenches and excavations	Risk of community individuals' fall in the trenches; and occupational risks	<ul style="list-style-type: none"> - Ensure that trenches in the public areas shall be adequately barricaded and provided with signs to prevent risk of public falling in to the trenches - Store all materials, including those removed from the trench or excavation, at least 2 feet away from the sides of the trench or behind a suitable restraining system - Ensure that all adjacent buildings/structures or surface obstructions (e.g., trees, large rocks) near the trench are supported or removed - Support and protect all utilities spanning a trench or excavation 	Contractor	NRPB
Workers facilities at the works/construction sites	Lack of safe drinking water and sanitation facilities create unhygienic conditions at worksites	<p>The contractor shall:</p> <ul style="list-style-type: none"> - Arrange safe drinking water to workers - Provide adequate sanitation facilities agreed with the Engineer - Clean all worksites daily - Ensure workers do not eat, drink or smoke in the work areas affected by mold 	Contractor	NRPB
Child and youth labor	Children under the age of 15 years are prohibited from working. Youth workers of age 15 to 18 have some work restrictions. Children under the age of 16 should undergo compulsory education	<ul style="list-style-type: none"> - The Contractor shall not hire any labor less than 16 years of age. - The Contractor shall not engage youth workers in nighttime shifts (between 7.00 p.m. and 7.00 a.m.) and perform dangerous works, such as operate cranes, platform hoists, fork-lift; and carry or lift loads frequently. 	Contractor	NRPB
Grievance Mechanism	Workers shall have access to GRM to raise workplace concerns.	<p>If contractor does not address concerns, workers will be directed to the NRPB's GRM mechanism. The Social Specialist in NRPB will track the resolution of complaints and present them in a quarterly report. (Annex 5) .</p> <p>There is a specific GBV/SEA referral mechanism that will be shared with community and followed up with by NRPB Social Specialist.</p>	Contractor	NRPB

ESHS Risks/Impact/Activity	Description of the Risk/Impact	Mitigation Measures	Responsibility	
			Implementation	Supervision
Workplace injuries and accidents and other incidents	If incidents are not investigated and root causes are not identified, there is a risk that they may repeat	<ul style="list-style-type: none"> - The NRPB Environmental and Social Safeguards Officers and their Supervision Consultant shall investigate all incidents related to workplace injuries and accidents; and, on the environment (e.g. oil spills, pollution events), and social (e.g. gender-based violence, the non-function of GRM, etc.) incidents. - The Contractor shall implement the recommendations of the Supervision Consultant to avoid recurrence of these incidents. 	Contractor	NRPB
Waste from works/ construction sites	Pollution from the improper management of solid wastes and excess materials from the construction sites.	<ul style="list-style-type: none"> - The Contractor shall properly collect all waste from the worksites and transport these wastes to the disposal sites approved by the NRPB. - When discarding the damaged material affected by the mold, the Contractor shall wrap and seal them in the plastic bags. 	Contractor	NRPB
Mold remediation in small isolated areas	Mold remediation may pose health risks to the infants and persons recovering from surgery, immune suppressed people, or people with chronic inflammatory lung diseases (e.g., asthma, hypersensitivity pneumonitis, and severe allergies)	<ul style="list-style-type: none"> - The NRPB and the Contractor shall ensure the work area should be unoccupied, and the nearby areas are free of infants and people with respiratory problems. - The contractor shall cover surfaces in the work area that could become contaminated with secured plastic sheets to contain dust and debris and prevent further contamination; and use approved biocides and detergents for the cleaning of mold. - After the mold cleaning, the area shall be clean, dry, and free of visible debris. 	Contractor	NRPB
Drainage and Wastewater from the construction sites	Drainage from the construction sites and material storage sites (sand and aggregates) may contain sediment load	<p>The Contractor shall</p> <ul style="list-style-type: none"> - Cover all stockpiles containing loose materials such as sand and aggregates with the plastic covers to protect them from rain - Not allow ponding of water near the construction sites. - Direct all wastewater from the construction activities to the municipal sewerage system 	Contractor	NRPB
Noise pollution	Noise and vibrations from the construction activities and equipment may cause a nuisance to the nearby communities.	<p>The Contractor shall:</p> <ul style="list-style-type: none"> - Avoid undertaking the noisiest activities, where possible, when working at night near the residential areas. - Maintain all equipment and vehicles to keep them in good working order. 	Contractor	NRPB

ESHS Risks/Impact/Activity	Description of the Risk/Impact	Mitigation Measures	Responsibility	
			Implementation	Supervision
Air pollution	Dust from construction activities and emissions from construction equipment and vehicles may cause air pollution	The Contractor shall: <ul style="list-style-type: none"> - Use water spray or mist to suppress dust generation, especially during operations that may create a lot of dust, such as cutting or sawing silica-containing materials, jack hammering, impact drilling, using heavy equipment, and demolishing structures - Maintain all machinery and vehicles in acceptable working conditions. 	Contractor	NRPB
Traffic and road safety	The temporary storage of materials on the streets and parking of equipment and vehicles, and excavations along the roads may block the local streets	The Contractor shall: <ul style="list-style-type: none"> - Not block the local streets/roads for the traffic - Where relevant, place traffic signs and flagmen at required places to control the traffic as directed by the NRPB 	Contractor	NRPB
Community complaints	Negative impact on the local community	The contractor shall acknowledge, record the complaint and act on it and report the complaint to the NRPB. Should contractor fail to resolve complaint it will be taken up by NRPB social specialist who will in turn investigate and follow up with the complainant.	NRPB	NRPB
Damage to private or public property	Negative impact on community and stakeholders	The contractor shall record, report the incident to the supervisor and NRPB Environment and Social Safeguard Officers who will work together to resolve the incident.	Contractor	NRPB
Use of preservatives and paint substances	Hazardous substances in preservatives and paint substances	<ul style="list-style-type: none"> - All paints and preservatives shall be used only with the approval of the contracting officer. Information shall be provided to the IRC/NRPB that describes the essential components of the materials to be used so that an informed determination can be made as to the potential for environmental effects and suitability can be made. - The contractor shall provide the contracting officer with a list of materials and estimated quantities to be used, storage, spill control and waste disposal plans to be observed by the supervisor of works during the execution of the contract. This plan is subject to the approval of the contracting officer. 		

ESHS Risks/Impact/ Activity	Description of the Risk/Impact	Mitigation Measures	Responsibility	
			Implementation	Supervision
Site stabilization and erosion control	Risks of soil erosion	<p>- Contractor shall implement measures at the site of operations to manage soil erosion through minimization of excavated area, preservation of existing ground cover to the extent possible, provision of approved ground cover.</p> <p>Where excavations are made, contractor shall implement appropriate stabilizing techniques to prevent cave-in or landslide. Erosion control measures shall be approved by the contracting officer.</p>		

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4.2.1 ESHS Mitigation Monitoring for Minor Works/Minor Repairs

NRPB will monitor the implementation of the standard ESHS Mitigation Measures applicable to minor works contracts. Table 4-2 indicates the monitoring parameters that the NRBP Environmental and Social Safeguards Officers will apply.

Table 4.2. ESHS Monitoring Plan for Major Works

#	Monitoring Parameter/ Activity	Means of Monitoring	Compliance Indicator/Threshold Limits	Frequency	Responsible Agency
1	Controls for workplace hazards	Visual inspection to ensure controls for workplace hazards are in place	Implementation of Control Measures specified in the Inspection report	Monthly	NRPB
2	Workers attend the ESHS Risks and Code of Conduct	Inspection of training records and interviews with the workers	100 percent of workers have attended ESHS and CoC sessions	Monthly	NRPB
3	Use of PPE by staff	Visual inspection on use of relevant PPEs	100 percent use of PPE	Monthly	NRPB
4	Licensed equipment operators and vehicle drivers	Visual inspection of driving licenses	All operators and drivers have valid licenses	Monthly	NRPB
5	Water and sanitation facilities at worksites	Visual inspection and interviews	Availability of safe drinking water and sanitation facilities	Monthly	NRPB
6	Water and sanitation facilities at workers' residences	Visual inspection and interviews	Availability of safe drinking water and sanitation facilities, and adequate kitchen supplies	Monthly	NRPB
7	Cleanliness at worksites and residences	Visual inspection	Worksites shall be clean without rubbish	Monthly	NRPB
8	First Aid Kits at worksites and residences	Visual inspection and interviews	All worksites and worker's residences shall have adequate first aid kits	Monthly	NRPB
9	Grievances from labor	Records of grievances registered and resolved.	All grievances shall be addressed with 15 days of the complaint.	Monthly	NRPB
10	Air pollution	Visual inspection of equipment/vehicle exhausts and records of vehicle maintenance	All equipment and vehicles shall be maintained as per manufacturers recommendations	Monthly	NRPB
11	Noise and vibration	Visual inspection of noise control measures	Controls measures shall be in place for high noise generating equipment	Monthly	NRPB
12	Wastewater Discharges	Visual inspection of wastewater discharges	All wastewater shall be directed to the sewerage facility	Monthly	NRPB

#	Monitoring Parameter/ Activity	Means of Monitoring	Compliance Indicator/Threshold Limits	Frequency	Responsible Agency
13	Waste Management	Waste management as per the approved plan	Facilities are clean, and waste collection and disposal facilities are in place	Monthly	NRPB
14	Traffic Safety	Visual inspection for traffic management	The smooth flowing of traffic; and placement of traffic signs and flag-person	Monthly	NRPB
15	Hydrocarbon and chemical storage and handling	Visual Inspection of storage facilities	No leakages from the containers in the storage. Handling follows procedures to avoid spillages.	Monthly	NRPB
16	Restoration of Work Sites	Visual Inspection	The facilities are clean with no waste at the works sites	Monthly	NRPB
17	Complaints reports	Record review	Records are up to date and complaints closed out within 15 days satisfactorily by contractor. If not, they should be escalated to NRBP.	Monthly	NRPB

4.3 Guidance for Preparing Specific ESMPs for Major Works

When major works will be implemented, NRPB will prepare standalone ESMPs regarding the specific risks of the works. This section describes the step-by-step methodology to be followed for the design and implementation of activities associated with major works.

4.3.1 Environmental and Social Screening of Proposed Activities

As a first step, environmental and social screening of each sub-component will be carried using a screening checklist Table 3-3 for environment and Table 3-4 for social. The screening will help get an idea about the degree and extent of environmental and social impacts of an activity. This preliminary identification of possible impacts will guide to identify further detail environmental and social assessments. This environmental and social screening will be carried out through:

- Reconnaissance of the subcomponent area and identification of the presence of environmental and social sensitive receptors;
- Identification of major subcomponent activities;
- Preliminary assessment of the probable environmental and social impacts of different activities during construction and operational stages.

4.3.1.1 Labor Issues

Hurricane Irma has exacerbated the already high levels of unemployment in Sint Maarten. At the same time, there are not enough skilled construction workers to satisfy the demand in the sector. The project will ensure that workers brought into the country for the Bank-financed projects receive fair treatment and are offered acceptable living and working conditions. The project will also ensure that the influx of

workers is managed in a way that avoids social conflicts, impacts on community health or the risk of gender-based violence. Basic requirements will be incorporated into the international requests for tenders and contracts. All workers financed through the project will be required to sign codes of conduct to safeguard fellow workers and the community against harassment and exploitation.

4.3.1.2 Health and Life Insurance

Since public health services in Sint Maarten are limited (all doctors work privately), employers should either provide health insurance or make appropriate arrangements for expatriate workers to receive medical attention and, if necessary, repatriation in case of sickness, injury or death. Locally hired workers must also be covered by health insurance through the national SZV or other health insurance scheme to be paid for by the contractor.

The social screening will include a description of several types of labor to be used under the project and the anticipated health and safety, and community risks, including labor influx and Gender-Based Violence. These potential risks should be assessed and measures to address them shared with the contractor.

4.3.2 Baseline Data Collection

Baseline environmental and socioeconomic conditions of the affected households will be collected through structured interviews with the affected people.

4.3.3 ESHS Risk Mitigation Measures for Major Works

Mitigation measures presented in Table 4-1 will also be implemented for works classified as Moderated Works and Major Works as per sub-section 3.4. The Environmental and Social Safeguards Officers will adjust when necessary and incorporate the standard mitigation measures in the corresponding bidding documents, requests for quotes, draft contracts, and ensure provisions are included in the final contracts signed for the construction of works. Additional mitigation measures will be adopted for heightened, specific risks. The standard mitigation measures are based on the relevant policies of GoSM, the World Bank Safeguard Policies and the World Bank Group Environmental, Health, and Safety Guidelines, and how they have been considered while designing the Project and preparing the ESMP.

4.3.3.1 Disaster Preparedness

Contractors for major works must develop procedures to address the risk of further natural disasters (hurricanes and earthquakes) and fires. When relevant, they must ensure workers have access to hurricane shelters. Workers must be familiarized with the emergency procedures during induction and as part of regular health and safety follow-up sessions.

4.3.3.2 Occupational Risks at Work Sites

When worker influx from outside Sint Maarten is considered, preparation of accommodation of workers must be considered. Because of the damage caused by Hurricane Irma, there is a shortage of affordable accommodation on Sint Maarten. Contractors for major works will be asked to arrange suitable accommodation for workers coming from outside the country. This could take the form of work camps or arrangements made with hotels/guest houses. The accommodation must provide workers with adequate toilet and shower facilities, beds and space for their personal effects. Workers must be provided with return tickets to ensure that they can return to the place from which they were hired.

4.3.3.3 Community Engagement and Consultation

In addition to the measures indicated in Table 4-1, contractors must prepare a community communication and consultation plan to ensure local stakeholders are aware of the works and impacts and how to access the grievance procedure.

4.3.3.4 Code of Conduct

NRPB has adopted a Code of Conduct to ensure Environmental, Social, Health and Safety measures are adopted by the Bureau and its contractors. As such, the Contractor shall Sign a 'code of conduct' with all its staff before mobilizing them into the construction. The code of conduct will include the responsibilities of the workers in dealing with the local community and following the instruction from the supervisor. NRPB will include request of CoCs for all contractor of major works. For details please see Annex 4.

4.3.4 Contractor's Construction Environmental Action Plan

As a requirement under the bidding documents, the Contractors for all major works will need to submit a Construction Environmental Action Plan prior to their mobilization for PIU approval. This plan will consist of the following site-specific management plans that will be prepared in compliance with the requirements of the bidding documents, ESMP and World Bank EHS guidelines:

- Traffic management plan
- Pollution prevention plan
- Waste management plan
- Labor influx and construction camp management plan
- Code of conduct for the workers
- Occupational health and safety
- Fuels and hazardous substances management plan
- Emergency preparedness plan

In addition, the Contractor will need to submit a Job Safety/Hazard Analysis at the beginning of construction works at each new site where major works will be implemented, addressing the measures associated with various hazards at the work sites. These reports will be reviewed and approved by the PIU after ensuring the mitigation measures proposed in the analysis are in place at the work sites.

4.3.5 Compliance Monitoring and Reporting

The Contractor's Environmental, Social, Health and Safety Specialists are responsible for implementing the ESMP, while the Environmental and Social Specialists of the Construction Supervision Consultant and the Environmental and Social Safeguards Officers NRPB will be responsible for overall monitoring of the EMSPs throughout the Project implementation.

Compliance monitoring comprises of on-site inspection of the construction activities to verify that measures identified in the ESMP and that are included in the clauses for contractors are being implemented. This type of monitoring is similar to the normal technical supervision tasks ensuring that the Contractor is achieving the required standards and quality of work.

The following reports will be prepared on the implementation of ESMP:

- Monthly environmental and social monitoring reports by the Contractor on the status of implementation of environmental, social, health and safety aspects, and
- Quarterly environmental and social monitoring reports by the NRPB on the status of implementation of environmental, social, health and safety aspects

The topics to be covered in these reports are summarized below:

- Environmental and social incidents or non-compliance with contract requirements
- Health and safety incidents, accidents, injuries and all fealties that require treatments
- Inspection of workers accommodation and workers and community grievances
- Training conducted and their content
- Environmental and social issues encountered and how they were mitigated
- Compliance status on ESMP requirements

4.3.6 Submission of ESMPs and ARAP for World Bank Clearance

Draft ESMPs and ARAP for each subcomponent will be submitted to World Bank no objection before initiating any construction works.

4.4 Preparation of Abbreviated Resettlement Action Plans

4.4.1 Involuntary Resettlement Initial Assessment

Currently no land acquisition for right of way works on cabling is anticipated under the project. However, some of the works could require relocation of buildings on the same site. For the sub-components 3.1 and 3.2 there are health and safety risks that require the residents to be relocated during the works and so World Bank OP 4.12 Involuntary Resettlement is triggered. This requires individual Abbreviated Resettlement Action Plans (ARAPs) to be developed, consulted on and disclosed for these work streams.

As a result, guidance on the preparation of ARAPs is provided. All safeguards documents will be consulted upon with the PAPs to give the opportunity for input and the final document will be disclosed [and implemented](#) prior to the start of works.

4.4.2 Processes and Activities for Preparation of ARAP

Activities to be carried out for preparation of ARAP include:

- a. description of the activity/event that causes displacement;
- b. census survey of temporarily displaced households, and/or services;
- c. impacts caused by displacement;
- d. mitigation of temporary storage of household assets;
- e. alternative for disturbance allowance and other resettlement assistance to be provided;
- f. consultations with displaced people about acceptable alternatives;
- g. timetable;
- h. budget;
- i. institutional responsibility and capacity for implementation and procedures for grievance redress;
- [and](#)
- [j.](#) arrangements for monitoring and implementation;
- [j-k.](#) [and a Grievance Redress Mechanism will be discussed with and agered to with PAPs-](#)

4.5 Grievance Redress Mechanism

NRPB has a Grievance Redress Mechanism (GRM) in place and available for all external stakeholders. This mechanism will be communicated broadly and designed in a way that is accessible to all. Complaints are a valuable source of feedback and a valuable tool for organizational development. Diligent and prompt

attention to complaints can help identify the needs of persons that encounter the National Recovery Program Bureau, understand the shortcomings, increase satisfaction and improve the overall performance of the staff of the Bureau.

The objective of the complaint procedure for this project is to ensure that the National Recovery Program Bureau handles complaints fairly, efficiently and effectively. The Bureau aims to provide quick and effective resolution to concerns and complaints.

NRPB's complaint procedure intends to:

- 1) enable us to respond to complaints in a timely and cost-effective way
- 2) boost public confidence in our work and administrative processes, and
- 3) provide information on complaints to enhance and give a quality impulse to our products and services.

All contracts for works will incorporate specific references to the application and enforcement of NRPB GRM. Contractors will be asked to address complaints and resolve them within 15 days, and if not, complaints will be escalated to NRPB. The NRPB Social safeguards Officer will monitor the implementation of the Grievance Redress Committee (GRC) to address stakeholders concerns throughout project implementation. Details of the Grievance Redress Mechanism is presented in Annex 2.

In addition, NRPB will prepare a community communication and consultation plan to ensure communities are aware of the works and impacts, the code of conduct and how to access the grievance procedure.

5 Project ESMP Implementation Arrangements

5.1 Institutional Arrangements for the Project

Execution of activities under the Component 1 will be carried out by the NRPB with technical oversight from the specialized recipient agencies namely the Ambulance Department (Ministry of Public Health, Social Development and Labor, VSA), the Fire Department (Ministry of General Affairs), the Meteorological Department of Sint Maarten (TEATT), Ministry of Education, Youth and Sports (MECYS), and the National Police Service (Ministry of Justice), with the support from the World Bank.

Activities of the Sub-component 3-1 will be conducted under the auspices of the NRPB.

Activities of the Sub-component 3-2 will be conducted under the auspices of the NRPB, with technical oversight from the SMHDF.

5.1.1 National Recovery Program Bureau (NRPB)

The government has established the National Recovery Program Bureau (NRPB) that will be responsible for the implementation of this project as well as all other recovery and resilient projects selected by the SDTF's Steering Committee under the NRRP. The Bureau will carry out technical, administrative, legal, financial and procurement responsibilities and be staffed to lead project implementation. It will have overall responsibility for ensuring compliance with fiduciary agreements and procurement guidelines, social and environmental management, and monitoring, reporting and evaluation of processes and results. It will coordinate technical designs of the projects with relevant ministries and conduct consultative and reporting functions. NRPB will also conduct the procurement of equipment, goods and services with technical inputs from relevant ministries and/or agencies.

Before the Bureau is in place, the project implementation responsibility will be carried out by the Interim Recovery Committee (IRC), which was established by the government to coordinate Trust Fund projects

until the Bureau is in place. The IRC will serve as a primary Project Implementation Unit (PIU) until NRPB is established. The Interim Recovery Committee (IRC) is expected to continue supporting the NRPB during a period of up to 6 months after the NRPB is set up. The IRC includes technical, administrative, legal, financial and procurement staff to handle Project implementation. It acts as an overarching project implementation support unit coordinating with and assisting all co-executing ministries/agencies and reports directly to the Prime Minister and Minister of General Affairs.

The IRC and subsequently the NRPB will be the single point of coordination for national and international stakeholders concerning the recovery, reconstruction and resilience projects that are financed through the SDTF; and will be responsible for ensuring the inclusion of the ministries, and any other stakeholders throughout all phases of these projects.

The IRC/NRPB, will work closely with the accountable ministries' as the focal points and/or project coordinators will:

- Ensure timely involvement of, ministry focal points and/or project coordinator, as well as stakeholder's representatives, including the facility manager, during planning stages for the repairs to stakeholder buildings.
- Share draft plans with relevant stakeholder's representatives and relevant ministry counterparts
- Identify the person directly responsible for the facility, with whom close coordination will be ensured through the project
- Where necessary, review contingency plans prepared by line ministries, including actions to be taken during the construction phase.
- Provide regular updates to stakeholders and ministry counterparts during the construction phase.

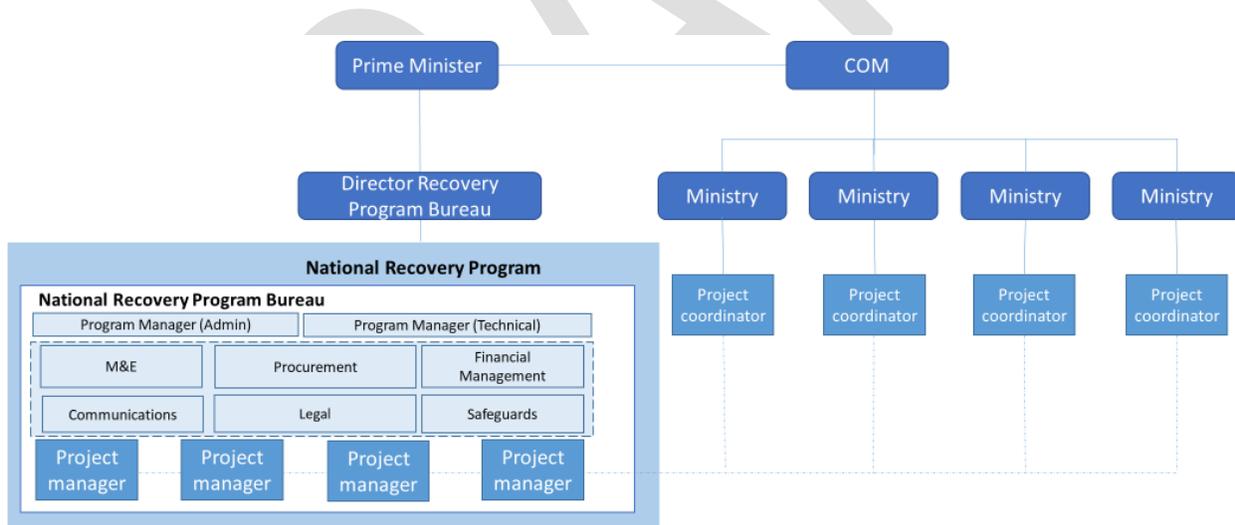


Figure 5-1. Organization of Responsibilities for the Overall Recovery Program

5.1.2 Other Ministries and Agencies of the Sint Maarten Government

The co-executing ministries/agencies will be responsible for the technical inputs and oversight in the preparation and implementation of specific activities. The project coordinators for each specific activity benefitting a ministry/agency will sit in the said ministry/agency. The relevant ministries and/or agencies will provide inputs to NRPB during processes such as procurement and environmental and social management. Relevant ministries and/or agencies include MGA (fire station and the police station); VSA (public health); TEATT (Hydro-meteorological office); GEBE (utility – water and electricity); Ministry of

Public Housing, Environment, Spatial Development and Infrastructure – VROMI (private house roof repairs and public buildings); and SMHDF (social housing repairs).

VROMI will be responsible for the technical design and supervision aspects of the works while the fiduciary and safeguards requirements will be overseen by the IRC (and the NRPB once set up). As such, VROMI and the IRC will together undertake the repairs of the public buildings including the fire station, police station, shelters and schools. VROMI employs a modest engineering staff and will need the support of a consulting firm (including engineering design and supervision consultants) to implement a project of this magnitude. Details of the relevant ministries and their focal points are given in Table 5-1.

Table 5.1. Ministries/Agencies Focal Points and Specific Project Coordinators

Ministry/Agency	Primary Focal Point	Alternate Focal Point	Project Coordinators for Specific Activities (if any)
MECYS	Suzan Aafjes	TBD	(possibly for schools)
MGA	Angelique Gumbs	TBD	(possibly for fire department)
Finance	Catherine Connor	TBD	
TEATT	Saskia Thomas-Salomons	TBD	(for MDS perhaps)
VROMI	Sergio Dias	TBD	(possibly for roof repair/public buildings)
VSA	Francetta Schoe	Roxanne Howell	
MinJUS	Johishi Romney	Fehmi Kutluer	(possibly for police stations)
GEBE	Patrick Drijvers	TBD	
SMHDF	Helen Salomons	Telston Bell	

5.1.3 World Bank

There will be a significant demand on the World Bank Hands on Expanded Implementation Support to assist with project management and implementation. The agencies within the Government of St. Maarten are unfamiliar with the environmental and social safeguard procedures at the World Bank. Additionally, the demands of the recovery program are diverse and considerably greater than what the pre-hurricane levels government agencies were designed to manage.

The Bank will provide general oversight of project activities particularly with respect to the environment and social safeguards.

5.2 Institutional Arrangements for Implementation of ESMPs

Details of environmental and social staff associated with various consultants and contractors to be engaged under the Project are summarized below:

- **Environmental and Social Staff in the PIU.** NRPB will hire an Environmental Safeguards Officer and a Social Safeguards Officer. The specialists will assist the PIU on issues related to the management of the environmental and social safeguards, supervise the contractors for small works, and oversee the Construction Supervision Consultant (CSC) and contractors for major works. The Specialists will compile quarterly monitoring reports on ESMF and ESMP compliance, to be sent to the Project Director and shared with the World Bank, throughout the construction period.
- **ESMP Consultants.** NRPB will procure services of a consulting firm for preparation of specific ESMPs and ARAPs when applicable
- **Design Engineering Consultant:** The Design Engineering Consultant will be responsible for the preparation of detailed designs and bidding documents for the subcomponents. Environmental

and Social safeguards Officer of NRPB and CSC will be responsible for ensuring the incorporation of environmental and social requirements in the bidding documents.

- **Construction Supervision Consultant (CSC).** The CSC will ensure adherence to the design parameters including quality requirements, as well as all ESMP measures related to construction. CSC will consist of adequate environmental and Social safeguards Officers.
- **Contractors:** Contractors will also have adequate environmental, health and safety specialists to implement the environmental and social management plans of the ESMP.
- **Monitoring and Evaluation Consultants (M&E Consultants).** The PIU will also engage an independent organization to carry out third-party monitoring, including environmental and social aspects, during project implementation.

Roles and responsibilities of NRPB’s environmental and social staff and consultants for environmental and social management of the Project are given in Table 5.2.

Table 5.2. Roles and Responsibilities in Environmental and Social Management of the Project

Organizations	Responsibilities
NRPB	<ul style="list-style-type: none"> • Ensure that all project activities are well-managed and coordinated. • Recruitment of consultants for ESMP studies; and approval of ESMP by WB • Procurement of works and goods. • Payment of compensation to the project affected households • Recruitment and supervision of Consultants
NRPB Environmental and Social Safeguards Officers	<ul style="list-style-type: none"> • Carrying out an environmental and social assessment in compliance with the World Bank guidelines following the ESMP • Provide guidance to the contractor on implementation of ESHS aspects and provide training to the contractor’s staff for small works • Prepare Tor for specific ESMPs for inclusion in the bid documents • Monitoring of the implementation of ESMPs and ARAPs
CSC	<ul style="list-style-type: none"> • Supervise civil works, ensuring compliance with all design parameters including quality requirements and ESMP implementation • Provide guidance to the contractor on implementation of ESHS aspects and provide training to the contractor’s staff
Contractor (Major Works)	<ul style="list-style-type: none"> • Prepare construction environmental and social action plans with site-specific mitigation measures. • implementation of mitigation and monitoring measures proposed in the ESMP • Each contractor will recruit an ESHS Specialist, who will be responsible for implementing the contractors’ environmental, social, health and safety responsibilities, and liaising with government agencies. For smaller works, the Contractor will designate one of its senior site engineers as the Focal Point for ESHS aspects.

5.3 Capacity Building and Training

NRPB will take the lead in implementing an ESHS capacity building plan, though the contractors will also be responsible for conducting ESHS awareness for their own staff and workers. The various aspects that are covered under the capacity building will include general environmental and social awareness, key environmental and social sensitivities of the area, key environmental and social impacts of the project, ESMF and ESMP requirements, and OHS aspects. NRPB may revise the plan during the project implementation as required.

Table 5.3. Environmental and Social ESHS Awareness Program

Contents	Participants	Trainer	Schedule
Impacts of the Project and ESMF/ESMP requirements of the Contractor; World Bank Environmental and Social Standards; World Bank Group Environmental Health and Safety Guidelines. The contents for the second and subsequent training programs will cover topics related to the issues associated with on-going construction activities.	NRPB Technical Staff & Representatives of all implementing agencies	NRPB E&S Specialist, CSC, and World Bank	During project implementation (To be repeated as needed.)
E&S issues associated with the construction works ESMP requirements of the contractors. Workers health and safety	Construction crew	NRPB E&S Specialist, CSC, and Contractors ESHS Staff	Prior to the start of the construction activities and during the construction activities (To be repeated as needed.)

6 Stakeholder Consultations Framework

6.1 Stakeholders of the Project

A wide range of stakeholders is involved in Project planning and implementation. The NRPB, implementing agencies, government, and political representatives are the internal stakeholders of the Project. External stakeholders of the Project include; the impacted communities, individual beneficiaries, contractors, non-governmental organisations, civil society, private sector, small to medium size businesses and the media. For each component there will be a different list of stakeholders. In addition, general public is considered as stakeholders of the project.

Component 1.1

Repair and Construction of Police Stations (2 buildings; one in a busy intersection in Philipsburg, and the other in an isolated site in Simpson Bay)

- Ministry of justice
- Police force (KPSM)
- Surrounding communities (businesses and residents) of the police stations

Repair of the Emergency Operations Center, EOC

- Fire station
- Ministry of General affairs
- Ambulance services
- Ministry of VSA
- Surrounding communities (businesses and residents) of the EOC

Repair and Construction of the Meteorological Buildings

- Ministry of TEATT
- Meteorological services
- Aviation services

- Surrounding communities (businesses and residents) of the Meteorological buildings

Repair of Shelters (13 buildings)

- Ministry of VROMI
- Ministry of ECYS (Schools, cultural centers, sports centers)
- Ministry of VSA, Department of CDHFA (community councils of St. Peters, Dutch Quarter, and Simpson Bay)
- Surrounding communities (businesses and residents) of the shelters

Component 2

Please add

Component 3

Home repair program (private homes)

- Beneficiaries/homeowners
- Ministry of VROMI
- Ministry of VSA
- Surrounding communities (businesses and residents) of the homes under repair

Sint Maarten Housing Development Foundation (social homes)

- 000[GAK1]
-

School repairs

- 000
-

6.2 Guidance for Carrying Out Stakeholder Consultations

Overall the approach of consultations will be open and transparent fostering a two way dialogue between stakeholders and the project. The consultation will be designed using locally appropriate approaches that are culturally sensitive and inclusive. Specific consultation plans will be developed to ensure that project affected people are well informed of the project details in advance of any activities. For any further ESMP developed or for any project requiring resettlement programme there will be a specific public consultation and disclosure process. Each consultation will be an opportunity to re-iterate the availability of the project grievance mechanism.

Stakeholder consultations will be carried out on each project component with the relevant stakeholders. While the NRPB are responsible for the co-ordination of the overall consultations, the accountable ministry will lead the implementation of the consultations. The consultations will be designed to allow for enough time to gather meaningful understanding and participation into the process.

Consultations on this ESMP will be held with an objective to share the findings of the ESMP and provide the stakeholders with an opportunity to participate in the project planning and implementation process.

The process to be followed for carrying out stakeholder consultations is:

- Stakeholder analysis/list specific to the topic/project in question

- Methodology designed that is appropriate to the audience to ensure inclusive and meaningful participation.
- Choice of various methods: participatory workshops, focus group meetings and face to face and informal individual interviews are the three most commonly adopted methods of stakeholder consultations and a mix of these can be employed under ERP1, as determined by the requirement.
- Records made of all consultations

For presenting the ESMP of ERP 1;

- The NRPB will organize a stakeholder consultation workshop. Prior to the consultation meeting, the draft ESMP will be disclosed on the NRPB website. For consultations on future standalone ESMPs, the NRPB may choose any of the above methods as appropriate.
- The NRPB will send invitations to all the stakeholder for attending the stakeholder consultation meeting. The invitation will include the venue, date and timing of the consultation meetings
- A power point presentation will be made on the ESMP explaining Project interventions, potential environmental and social impacts and risks of the project, and proposed management plans to address these impacts. The NRPB can also prepare pamphlets or brochures for presenting the standalone ESMPs.
- After the presentation is made, the participants will be encouraged to provide their comments and feedback. A comment sheet will also be provided for each participant to provide their comments and feedback.
- The process of consultation will be documented, and the ESMPs will be updated reflecting the feedback from the consultations
- The NRPB will ensure the consultations are effective, well targeted, transparent, and early enough to make sure to get the stakeholder views adequately reflected in the project decisions.

Annex 5 presents the list of meetings, stakeholders, inputs received and how inputs were addressed in the ESMP.

Annex 1. Applicable Government Regulations and World Bank Environmental and Social Standards

Sint Maarten, previously part of the Dutch Antilles, became an independent country within the Kingdom of the Netherlands on October 10, 2010. Sint Maarten has full autonomy for internal affairs including the environmental legislation, the Dutch government being responsible for defense and foreign affairs.

According to Article 22 of the 'Constitution of the Country of Sint Maarten,' It shall be the constant concern of the government of Sint Maarten to keep the country habitable and to protect and improve the natural environment and the welfare of animals.

A list of the ordinances, policies and decrees related to environmental protection that may be relevant to this Project are given below and some of these ordinances are further elaborated in the following sections:

- National Ordinance with Foundations for Nature Management and Protection:
https://decentrale.regelgeving.overheid.nl/cvdr/xhtmloutput/historie/Sint%20Maarten/142263/142263_2.html
- National Decree containing general measures for Nature Management and Protection:
https://decentrale.regelgeving.overheid.nl/cvdr/xhtmloutput/historie/Sint%20Maarten/207435/207435_1.html
- Eindrapport Milieunormen Nederlandse Antillen 2007:
<http://www.dcbd.nl/document/eindrapport-milieunormen-nederlandse-antillen-lucht-geluid-water-afvalwater-afval>
- Hinderance National Ordinance:
https://decentrale.regelgeving.overheid.nl/cvdr/xhtmloutput/historie/Sint%20Maarten/208542/208542_2.html
- Hinderance National Decree:
https://decentrale.regelgeving.overheid.nl/cvdr/xhtmloutput/historie/Sint%20Maarten/208543/208543_1.html
- Waste Water National Ordinance:
https://decentrale.regelgeving.overheid.nl/cvdr/xhtmloutput/historie/Sint%20Maarten/208544/208544_3.html
- Waste National Ordinance:
https://decentrale.regelgeving.overheid.nl/cvdr/xhtmloutput/historie/Sint%20Maarten/208510/208510_2.html
- National Ordinance on Maritime Management:
https://decentrale.regelgeving.overheid.nl/cvdr/xhtmloutput/historie/Sint%20Maarten/142339/142339_2.html
- Link to government page to download the Hillside and Beach Policy:
<http://www.sintmaartengov.org/government/VROMI/Pages/Ministry-Policies-and-Reports.aspx>

National Ordinance for the Foundations of Nature Protection and Management, 1999

The National Ordinance for the Foundations of Nature Protection and Management⁵ establishes laws for environmental management and the protection of fauna and flora species within the Sint Maarten island. The Ordinance provides the following key actions for environmental management:

- I. Ramsar Convention, CITES Convention, Bonn Convention, SPAW Protocol, Biodiversity Convention, and Sea Turtle Convention are considered and to be followed with.
- II. Nature plan is updated every five years.
- III. Monitoring and investigation in compliance with the Ordinance is performed.
- IV. Administrative enforcement and penalty fee are imposed on non-compliance.

National Decree of General Rules for Nature Protection and Management, 2003 (revised in 2010)

The National Decree containing general rules for Nature Protection and Management⁶ provides rules on the management and protection of flora and fauna and nature parks. The Decree provides the following key actions for environmental management:

- I. Nature park considered under management includes a protected area with ecological value, a geological value, a cultural history and an experience value.
- II. Other administrative bodies, institutions and organizations are also considered during the preparation of a nature plan. Public consultation is held for four weeks and is announced through publication in local newspapers in Dutch and English.
- III. A nature park can be wholly or partially abolished by national ordinance if the public interest exceeds the importance of preserving the nature park or the relevant part.
- IV. Actions that can damage the natural beauty or the value of a nature park is forbidden.

Waste Ordinance, 1993

Sint Maarten Waste Ordinance of February 23, 1993, provides regulations regarding the collection and disposal of residential waste, bulky wastes, liquid wastes, commercial waste, car wrecks and other categories of waste. The government is responsible for the collection of wastes generated from residential sites and dispose of it in the government operated landfill site on the island.

Collection of the waste generated from the commercial activities and its disposal in the government's landfill site is the responsibility of the owners of the commercial enterprises. The wastes generated during the proposed construction activities of the Project will also fall under the category of commercial waste. The Ordinance provides the following key actions for the management of commercial waste:

- I. Those who produce commercial waste must bring it to the government indicated dumpsite on a regular basis and at their own expense.
- II. They are authorized to place a third party in charge of this.
- III. The Executive Committee of Island Territory can establish regulations regarding the days, times and manner in which commercial waste can be collected and transported.
- IV. It is forbidden to throw, put down or leave behind trash or remnants of provisions, paper, cans, bottles or another packaging on or by the road that is open to the public or a place nearby.
- V. Violation of one of the prohibitions as determined by this Ordinance and failure to uphold one of the obligations as established by this Ordinance is punished by imprisonment for a maximum of two months or a maximum monetary fine of Netherlands Antillean Guilder (ANG) 1,000.

5. https://decentrale.regelgeving.overheid.nl/cvdr/xhtmloutput/historie/Sint%20Maarten/142263/142263_2.html

6. https://decentrale.regelgeving.overheid.nl/cvdr/xhtmloutput/historie/Sint%20Maarten/207435/207435_1.html

- VI. If as the violation or the failure to uphold the obligation takes place not a year as passed since an earlier conviction of the guilty party for a similar violation became irrevocable or since the voluntary compliance with a condition as set by the authorized civil servant of the Public Prosecutor on the basis of Article 76 of the Criminal Code of the Netherlands Antilles, the maximum term of imprisonment or monetary fine for sentencing can be doubled.

The Labor Legislation

The Labor Legislation describes provisions concerning the work-times, periods of rest, overtime, nightshift, standby shift, holidays, the prohibition of child labor, the prohibition of night work and dangerous work for youths. A copy of the regulations can be obtained from the GoSM website.⁷ According to this Legislation, children under the age of 15 years are prohibited from working, whether in exchange for wages or compensation, and youth between 15 and 18 cannot perform dangerous work. However, The Ministry of Public Health, Social Development & Labor also endorses⁸ that Children ages 16 and older can work, however convention no. 182 prohibits all forms of hazardous work for children. The intention is to ensure that every girl and boy has the opportunity to develop physically and mentally to her or his full potential, prohibiting all work by children that jeopardizes their education and development.

The head or director of an enterprise has an obligation to report occupational injuries to the Department of Labor and the police among others. The injuries should be reported as soon as possible, but no later than 24 hours.

World Bank Safeguard Policies and Guidelines⁹

The World Bank has developed several Safeguard Policies to ensure that all possible impacts are considered, and mitigation measures are spelled out before the implementation of any proposed project. These policies ensure that the quality of operations is uniform across different settings worldwide. If the decision is taken that a Safeguard Policy should be applied, mitigation measures and plans must be developed and in place before the implementation of a proposed project.

The Bank requires environmental and social screening and classification for all investment projects proposed for Bank financing, to help ensure that they are environmentally and socially sound and sustainable. Screening and classification consider the natural environment (air, water, and land); human health and safety; social aspects (including especially involuntary resettlement and presence of Indigenous Peoples); cultural property; and trans-boundary and global environmental aspects.

The objectives of environmental and social screening and classification are: to evaluate the environmental and social risks associated with a proposed operation; to determine the depth and breadth of Environmental and Social Assessment (ESA); and to recommend an appropriate choice of ESA instrument(s) suitable for a given project. The Bank recognizes that environmental and social screening and classification is not absolute and involves professional judgment on a case by case basis. When screening, careful consideration needs to be given to potential environmental social impacts and risks associated with the proposed project. Judgment is exercised with reference to the policy expectations

7. Website on Labour Regulations of GoSM: <http://www.sintmaartengov.org/government/VSA/labour/Pages/Labour-Legislation.aspx>

8.

<http://www.sintmaartengov.org/government/VSA/labour/Documents/Fundamental%20Rights%20of%20the%20Worker%20poster.pdf>

⁹ [World Bank Environmental and Social Safeguard Policies: https://policies.worldbank.org/sites/ppf3/Pages/Manuals/Operational%20Manual.aspx](https://policies.worldbank.org/sites/ppf3/Pages/Manuals/Operational%20Manual.aspx)

and guidance; real impacts on the ground; and established regional and Bank-wide precedence and good practice.

The applicable WB safeguard policies are described below.

Environmental Assessment (OP/BP 4.01)

EA requirement. The World Bank requires environmental assessment (EA) of projects proposed for Bank support to ensure that they are environmentally sound and sustainable, and thus to improve decision making. The Bank Policy OP/BP 4.01 considers that EA is a process whose breadth, depth, and type of analysis depend on the nature, scale, and potential environmental impact of the proposed project. EA evaluates a project's potential environmental risks and impacts in its area of influence; examines project alternatives; identifies ways of improving project selection, siting, planning, design, and implementation by preventing, minimizing, mitigating, or compensating for adverse environmental impacts and enhancing positive impacts; and includes the process of mitigating and managing adverse environmental impacts throughout project implementation. EA considers the natural environment (air, water and land); human health and safety; social aspects (involuntary resettlement, indigenous peoples and physical cultural resources); and trans-boundary and global environmental aspects. The Bank Policy also envisages that the borrower Government is responsible for carrying out the EA and the Bank advises the borrower on the Bank's EA requirements.

The present ESMF has been prepared in compliance with this OP/BP.

EA classification. The World Bank classifies the proposed project into one of the four categories, depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts. These categories are defined below.

- Category A: A proposed project is classified as Category A if it is likely to have significant adverse environmental impacts that are sensitive, diverse, or unprecedented. These impacts may affect an area broader than the sites or facilities subject to physical works.
- Category B: A proposed project is classified as Category B if its potentially adverse environmental impacts on human populations or environmentally important areas—including wetlands, forests, grasslands, and other natural habitats—are less adverse than those of Category A projects.
- Category C: A proposed project is classified as Category C if it is likely to have minimal or no adverse environmental impacts. Beyond screening, no further EA action is required for a Category C project.
- Category FI: A proposed project is classified as Category FI if it involves an investment of Bank funds through a financial intermediary (FI), in subprojects that may result in adverse environmental impacts.

Natural Habitats (OP 4.04)

The Policy highlights the importance of conservation of natural habitats, like other measures that protect and enhance the environment, for long-term sustainable development. The Bank, therefore, supports the protection, maintenance, and rehabilitation of natural habitats and their functions in its economic and sector work, project financing, and policy dialogue. The Bank also supports and expects borrowers to apply a precautionary approach to natural resource management to ensure opportunities for environmentally sustainable development. The Bank promotes and supports natural habitat conservation and improved land use by financing projects designed to integrate into national and regional development the conservation of natural habitats and the maintenance of ecological functions. Furthermore, the Bank

promotes the rehabilitation of degraded natural habitats. The Bank does not support projects that involve the significant conversion or degradation of critical natural habitats.

Physical Cultural Resources (OP 4.11)

This policy addresses physical cultural resources, which are defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Physical cultural resources may be in urban or rural settings and may be above or below ground, or underwater. Their cultural interest may be at the local, provincial or national level, or within the international community.

The Bank assists countries to avoid or mitigate adverse impacts on physical cultural resources from development projects that it finances. The impacts on physical cultural resources resulting from project activities, including mitigating measures, may not contravene either the borrower's national legislation or its obligations under relevant international environmental treaties and agreements.

Forests (OP/BP 4.36)

This Policy recognizes the need to reduce deforestation and promote sustainable forest conservation and management in reducing poverty. The Bank believes that forests are very much essential for poverty reduction and sustainable development irrespective of their location in the world. The Bank assists borrowers with forest restoration activities that maintain or enhance biodiversity and ecosystem functionality. The Bank also assists borrowers with the establishment and sustainable management of environmentally appropriate, socially beneficial, and economically viable forest plantations to help meet growing demands for forest goods and services. The Bank does not finance projects that, in its opinion, would involve significant conversion or degradation of critical forest areas or related critical natural habitats. Furthermore, the Bank does not finance projects that contravene applicable international environmental agreements.

Projects on International Waterways (OP 7.50)

Projects on international waterways may affect the relations between the World Bank and its borrowers, and between riparian states. Therefore, the Bank attaches great importance to the riparian making appropriate agreements or arrangements for the entire waterway, or parts thereof, and stands ready to assist in this regard. A borrower must notify other riparian of planned projects that could affect water quality or quantity, sufficiently far in advance to allow them to review the plans and raise any concerns or objections.

Involuntary Resettlement (OP/BP 4.12)

The WB's experience indicates that involuntary resettlement under development projects, if unmitigated, often gives rise to severe economic, social, and environmental risks: production systems are dismantled; people face impoverishment when their productive assets or income sources are lost; people are relocated to environments where their productive skills may be less applicable, and the competition for resources greater; community institutions and social networks are weakened; kin groups are dispersed; and cultural identity, traditional authority, and the potential for mutual help are diminished or lost. This policy includes safeguards to address and mitigate these impoverishment risks.

The overall objectives of the Policy are given below.

- Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.
- Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing enough investment resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.
- Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

Projects in Disputed Areas (OP 7.60)

Projects in disputed areas may raise a number of delicate problems affecting relations not only between the Bank and its member countries but also between the borrower and one or more neighboring countries. In order not to prejudice the position of either the Bank or the countries concerned, any dispute over an area in which a proposed project is located is dealt with at the earliest possible stage.

The Bank may proceed with a project in a disputed area if the governments concerned agree that, pending the settlement of the dispute, the project proposed for country A should go forward without prejudice to the claims of country B.

World Bank Group Environment, Health and Safety Guidelines

The Environment, Health, and Safety (EHS) Guidelines contain the performance levels and measures that are generally considered to be achievable in new facilities or project by existing technology at reasonable costs. In addition, there are also industry-specific EHS guidelines. The guidelines that are relevant to the Project are General EHS Guidelines¹⁰ and EHS Guidelines for Waste Management Facilities¹¹.

Public Consultation and Information Disclosure Requirements by World Bank

The Bank reaffirms its recognition and endorsement of the fundamental importance of transparency and accountability to the development process. Accordingly, it is Bank's policy to be open about its activities and to welcome and seek out opportunities to explain its work to the widest possible audience. According to 'OP 4.01: Environmental Assessment' of World Bank, the following conditions apply to the proposed subprojects.

Consultations. For all Category A and B projects, the borrower should consult the project-affected groups and local nongovernmental organizations about the project's environmental aspects and takes their views into account. The borrower should initiate such consultations as early as possible. For Category A projects, the borrower should consult these groups at least twice: (a) shortly after environmental screening and before the terms of reference for the EA are finalized; and (b) once a draft EA report is prepared. In addition, the borrower should consult with such groups throughout project implementation as necessary to address EA-related issues that affect them.

Disclosure. The borrower should provide relevant information on project interventions in a timely manner prior to consultation and in a form and language that is understandable and accessible to the groups being

10. <https://www.ifc.org/wps/wcm/connect/554e8d80488658e4b76af76a6515bb18/Final%2B-%2BGeneral%2BEHS%2BGuidelines.pdf?MOD=AJPERES>

11. <https://www.ifc.org/wps/wcm/connect/1cd72a00488557cfbdf4ff6a6515bb18/Final%2B-%2BWaste%2BManagement%2BFacilities.pdf?MOD=AJPERES&id=1323162538174>

consulted. The borrower also ensures that EA reports are made available in a public place accessible to affected groups and local NGOs.

Annex 2: Grievance Redress Mechanism of NRPB



COMPLAINTS PROCEDURE NATIONAL RECOVERY PROGRAM BUREAU

INTRODUCTION

[Feedback and Complaints can be addressed to: Complaints Mechanism – Environmental and Social Safeguards Officers](#)

[National Recovery Program Bureau](#)

[Soualiga Road no. 1](#)

[Pond Island, Great Bay](#)

[Sint Maarten](#)

[E-mail: Secretariatrecovery@Sintmaartengov.org](mailto:Secretariatrecovery@Sintmaartengov.org)

[For complaints related to GBV/SEA You may complain through this mechanism or contact in confidence the following entity which has the expertise to handle GBV incidents.](#)

Complaints are a valuable source of feedback and an important tool for organizational development. Diligent and prompt attention to complaints can help identify the needs of persons that met the National Recovery Program Bureau, understand the shortcomings, increase satisfaction and improve the overall performance of the staff of the Bureau.¹²

This objective of this complaint procedure is to ensure that the National Recovery Program Bureau handles complaints fairly, efficiently and effectively. The Bureau aims to provide quick and effective resolution to concerns and complaints.

Our complaint procedure intends to:

- a) enable us to respond to complaints in a timely and cost-effective way
- b) boost public confidence in our work and administrative processes, and
- c) provide information on complaints in order to enhance and give a quality impulse to our products and services.

12. Until the National Ordinance on the Bureau is in effect, complaints will be handled by the Interim Recovery Committee under the responsibility of the Minister of General Affairs.

WHAT IS A COMPLAINT?

A complaint is a written formal expression of dissatisfaction made to or about our services, products or staff. Requests for information, service requests and reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of response are to be distinguished from complaints.

This procedure applies to complaints filed against the staff at all levels within the Bureau. In case of doubt, the complaint officer will get in contact to clarify the merits of the request, report or complaint.¹³

A complaint cannot be filed if:

1. you already filed a complaint about the same service, product or staff at the Bureau or a complaint has been filed at the Ombudsman
2. the service, product or staff that caused the grievance took place over a year ago
3. there is a different way or procedure to address your grievances, for example through an appeals procedure based on a formal decision of the government
4. the complaint should be addressed to a different entity within the government, the Bureau will send the complaint to the right entity
5. your complaint is part of a court case or part of a criminal investigation by the Public Prosecutor
6. your complaint does not address the products, service, or conduct by our staff
7. your complaints are about the personal and general conduct of one of the staff members of the Bureau that is not directly related to a provided service

A complaint should be done in writing by or email using the attached form^[GAK2] and should contain the following information:

- a. personal and contact information: name, address, phone number, email address
- b. date
- c. merits and nature of the complaint: what happened, when it happened, who was involved
- d. the consequences of the occurrence: damage, or other grievance

~~Complaints can be addressed to: Complaints Mechanism – Environmental and Social Safeguards Officers
National Recovery Program Bureau
Souliga Road no. 1
Pond Island, Great Bay
Sint Maarten
E-mail: Secretariatrecovery@Sintmaartengov.org~~

ARE THERE COSTS INVOLVED?

No, filing a complaint is free of charge.

WHO IS HANDLING YOUR COMPLAINT?

A complaint officer together with the legal counsel to the Bureau is handling your complaint.

13. A service request includes but is not limited to: requests for approval, requests for action, routine inquiries on planning or state of affairs, reports of failure to comply with laws regulated by the Bureau, requests for explanation of policies, procedures and decisions.

This way it is ensured that the person handling the complaint is different from any staff member whose conduct or service is being a complaint about. Conflicts of interests, whether actual or perceived, will be managed responsibly.

HOW WILL THE COMPLAINT BE ADDRESSED?

Process:



Receipt

We will acknowledge receipt of each complaint promptly, and preferably **within 5 working days**. Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint. The complaint officers and legal counsel will consider any relevant legislation and/or regulations when responding to complaints and feedback.

Where possible, complaints will be resolved at first contact with the Bureau. We will address each complaint with integrity and in an equitable, objective and unbiased manner.

Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- ✓ the contact information of the person making a complaint
- ✓ issues raised by the person making a complaint and the outcome/s they want any other relevant and
- ✓ any additional support the person making a complaint requires

We will protect the identity of people making complaints where this is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by the Bureau as permitted under the relevant privacy Ordinance (National Ordinance on the Protection of Privacy), and any relevant confidentiality obligations.

Complaints filed against the Director of the Bureau will be handled outside the Bureau, by the Ministry of General Affairs, in order to ensure an independent procedure.

Initial assessment

Complaining is free of charge. After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

We will advise the complainant as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

Addressing the complaint

After the initial assessment of the complaint, we will consider how to address it. **Within 6 weeks, the complaint will be addressed.** Only in complex cases, this period can be extended. The complainant will be informed accordingly.

If a person prefers or needs another person or organization to assist or represent them in the making and/ or the resolution of their complaint, we will communicate with them through their representative if this is their wish. We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

When determining how a complaint will be addressed, we will consider:

- ✓ How serious, complicated or urgent the complaint is
- ✓ Whether the complaint raises concerns about people's health and safety
- ✓ How the person making the complaint is being affected
- ✓ The risks involved in the resolution of the complaint is delayed, and
- ✓ Whether a resolution requires the involvement of other organizations.

To address a complaint, we may:

- ✓ Give the person making complaint information or an explanation
- ✓ Gather information from the product, person or area that the complaint is about, or
- ✓ Investigate the claims made in the complaint.

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

We will assess and priorities complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security, the response will be immediate and will be escalated appropriately.

When similar complaints are made by related parties, we will try to arrange to communicate with a single representative of the group, if the parties agree to this.

Where a complaint involves multiple organizations, we will work with the other organization/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organized to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organization, responsibility for communicating with the person making the complaint and/or their representative will be coordinated.

Provide reasons for the decision

Following consideration of the complaint and an investigation into the issues raised, we will contact the person making the complaint and advise them:

- ✓ the outcome of the complaint and any action we took
- ✓ the reason/s for our decision
- ✓ the remedy or resolution/s that we have proposed or put in place, and
- ✓ any options for review that may be available to the complainant, such as filing a complaint at the National Ombudsman

If in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations under the *Landsverordening Bescherming Persoonsgegevens (National Ordinance on the Protection of Privacy)* and any applicable exemptions in or made pursuant to that Act, before sharing our findings with the person making the complaint.

Close complaint and follow up

After addressing the complaint and informing the complainant (including options for review if the complaint is not addressed to the satisfaction of the complainant), we close the complaint.

We will keep comprehensive records about:

- ✓ How we managed the complaint
- ✓ The outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and
- ✓ Any outstanding actions that need to be followed up.

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling officer and/or senior management.

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis in an aggregated and anonymous form. Those records are kept for a maximum duration in accordance with the law.

Regular reports will be run on:

- ✓ the number of complaints received
- ✓ the outcome of complaints, including matters resolved at the frontline
- ✓ issues arising from complaints
- ✓ systemic issues identified, and
- ✓ the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our services and make improvements.

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Both reports and their analysis will be provided to the Bureau’s senior management for review.
Any information provided on the complaints at the Bureau to Parliament will be anonymous.

DRAFT

Annex 3. Assessment^[GAK3] of 14 Households for the First Phase of Roof Repair Program

[Remove the ARPP and add the process that led to preparing the first ARAP as a pilot to inform subsequent ARAPs, the principles, treatment of special cases; who are vulnerable cases, and entitlement matrix that can be applied across various scenarios \(need to relocate, stay in house \(at night?\) while works proceed, SXM rotating temporary relocation into SXM housing\).](#)

It is estimated that per house the works can be done within 1-2 months.

The majority of the 14 households will be receiving cash compensation to assist them in their temporary relocation for the duration of the works. If beneficiaries are classified as 'vulnerable' they will get extra assistance from VSA in resettlement where needed. In each particular case, a social assessment of the situation will be done based on the attached assessment form by the Activities Manager. Based on this report an assistance package will be tailored to the situation. This assistance will be determined on a case by case basis in order to cater to their circumstances. It is anticipated that in these scenarios VSA will manage the resettlement for the person. For example, a very elderly person that cannot stay with family and need for example medical care can be assigned as a vulnerable case and will be resettled by the government. In this situation, the individual will be resettled using all the appropriate experts and services required for their needs and the **any compensation they are entitled to ensure they are not disadvantaged by the project.** Special attention and preference will be given to vulnerable groups such as pensioners, disabled and single mothers with children who are identified as having difficulty in resettling during the works.

Table A-1. Social Assessment of 14 Households for Roof Repair

#	District	Household no. persons	Age	Vulnerability	Package	Cost
1	Dutch Quarter	2 Son lives with her	Age 78	Possible vulnerability. Son had a stroke, will be followed up and assessed. ¹⁴	Package 2	\$650+ storage
2	Dutch Quarter	1	Age 86	No. Since the last visit, her husband died, she is living with her son in his house, and he is taking care of her. Trouble walking. Can stay with son during construction.	Package 1	
3	St. Peters	2	Age 83 Age partner 55	No	Package 2	\$650+ storage
4	Cole Bay	1 Staying at daughter's house	Age 77	No	Package 1	\$500+ storage
5	Sucker Garden	1	Age 67	No	Package 1	\$500+ storage
6	South Reward	2 Daughter lives with her	Age daughter: 24	No	Package 2	\$650+ storage

¹⁴ Report dates from September 2018

#	District	Household no. persons	Age	Vulnerability	Package	Cost
7	Middle Region	Minimum 3 Wife, Husband, grandchild Son— indication of mental illness	Wife: 89 Husband: 94	Possible vulnerability, will be followed up and assessed on situation with daughter/son to establish correct entitlement package. ¹⁵	Package 4	\$950+ storage
8	St. Peters	2	Age 70 Age wife 60	No	Package 2	\$650+ storage
9	St. Peters	1	Age 77	No	Package 1	\$500+ storage
10	Middle Region	2	Age 68 Age husband 70	Possible vulnerability: has trouble walking, and has a wheelchair. Will be followed up and assessed.	Package 2	\$650+ storage
11	Sucker Garden	2, husband and wife Staying with relative	Age 63 husband Wife 51	No	Package 2	\$650+ storage
12	Cul de sac	1 Lives by her cousin	Age 65	No	Package 1	\$500+ storage
13	St. Peters	1	Age 67	No	Package 1	\$500+ storage
14	Philipsburg	1 Staying with son	Age 62	No	Package 1	\$500+ storage

¹⁵ idem

Annex 4. Code of Conduct for Construction Workers

This Code of Conduct contains obligations on all Contractor's staff including its sub-contractors' staff. All staff hired by the Contractor should sign this Code of Conduct.

.....

Code of Conduct for the Implementation of Project (insert name of the Project)

Contractor:

Contract:

Comply with applicable laws, rules, and regulations of the Government of Sint Maarten;

Comply with applicable health and safety requirements (including wearing prescribed personal protective equipment, preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment);

Not use illegal substances any anytime on or off the job;

Not Discriminate against any other worker (for example on the basis of family status, ethnicity, race, gender, religion, language, marital status, birth, age, disability, or political conviction)

Have respectful interactions with community members (for example to convey an attitude of respect and non-discrimination) with local communities;

Not engage in any act of sexual harassment (whether through use of language or behavior, towards men or women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)

Not engage in any act of violence or exploitation (including prohibition of the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior)

Ensure the 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)

Uphold Sanitation requirements (for example, that all workers use specified sanitary facilities provided by their employer and not open areas)

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

Respect reasonable work instructions (including regarding environmental and social norms);

Protect and properly use property (for example, to prohibit theft, carelessness or waste)

Report violations of this Code as a duty.

Be Protected against retaliation for workers who report violations of the Code, if that report is made in good faith.

Be informed and allowed to access a Grievance Redress Mechanism without fear of reprisal.

On signing I confirm that:

I have received a copy of this Code

The code has been explained to me

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.

SIGNATURE: _____

PRINTED NAME: _____

EMPLOYER REPRESENTATIVE: _____

DATE: _____

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Annex 5. ESMP consultations (adjust according to consultations strategy agreed in May)

Date:

Attendants

Key issues discussed

Actions agreed

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Annex 6. ~~Use Annex 3 as a template for ARAP. Assessment of 20 Households for the Second Phase of Roof Repair Program~~

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Name	Date of Visit	Address	Comments related to Resettlement Need	Need for Resettlement During Repairs
William Simon	5/9/2019	E. Camille Richardson Street #3, Philipsburg	Some window replacements may need the replacement of the frame and some masonry work. If this work takes longer than 1 day, the residents may need to be resettled. Depending on the masonry work duration, resettlement may be needed. Consultation with the contractor and residents will be helpful.	May be needed.
Joyce Martina Rodriguez Pagan-Arrindell	5/9/2019	Caines' Drive #17A, Dutch Quarter	There is a need for electrical wiring which may be executed with the existence of the residents. Depending on the residents' approach, the resettlement may be considered.	May be needed.
Walter Ryner	5/9/2019	Madrid Road #20, Middle Region	The works needed can be executed with the existence of the residents. No need for resettlement.	No
Elsa Richardson e/v Son	5/9/2019	Middle Region Road #35, Middle Region	The works needed can be executed with the existence of the residents. No need for resettlement.	No
Evelle Codrington	5/9/2019	Algiers Drive Lane 2, Zorg en Rust #2, Dutch Quarter	The works needed can be executed with the existence of the residents. No need for resettlement.	No
Herman Maurice	5/10/2019	Charity Drive #13B, Cul de Sac	There is a need for electrical wiring work which may require more than one day. Depending on the residents' approach, the resettlement may be considered.	May be needed.
Ester Halley	5/10/2019	Soursap Road #11, St Peters	House is not occupied.	No
Rose Richardson	5/10/2019	Marigot Hill Road #10, St Peters	The furnitures were already moved to let the related works to be done properly.	No
Alfred Young	5/11/2019	Narrow drive #18(20?), Cole Bay	The repairs needed do not require resettlement.	No

Name	Date of Visit	Address	Comments related to Resettlement Need	Need for Resettlement During Repairs
Joan Guye	5/11/2019	Coconut Palm Drive, Union Road #7, Cole Bay	The repairs needed do not require resettlement.	No
James Hughes	5/11/2019	Paragrass Drive #5, Cole Bay	Some window replacements may need the replacement of the frame and some masonry work. If this work takes longer than 1 day, the residents may need to be resettled. Depending on the masonry work duration, resettlement may be needed. Consultation with the contractor and residents will be helpful.	May be needed.
Harry Carty	5/13/2019	Apricot Road #1, St Peters	If the handles of the windows can not be repaired then most of the windows need to be replaced. Depending on the replacement duration, resettlement may be needed. Consultation with the contractor and residents will be helpful.	May be needed.
Maria Iona Hazel	5/14/2019	A.J.C. Brouwer Road #188A, Colebay Hill	If the handles of the windows can not be repaired then most of the windows need to be replaced. Depending on the replacement duration, resettlement may be needed. Consultation with the contractor and residents will be helpful.	May be needed.
Emelda Audain	5/14/2019	Narrow Drive #27, Cole Bay	If the handles of the windows can not be repaired then most of the windows need to be replaced. Depending on the replacement duration, resettlement may be needed. Consultation with the contractor and residents will be helpful.	May be needed.
Cassandra Benjamin	5/14/2019	Sun Cactus Drive #7, Sucker Garden	If the handles of the windows can not be repaired then most of the windows need to be replaced. Depending on the replacement duration, resettlement may be needed. Consultation with the contractor and residents will be helpful.	May be needed.

Name	Date of Visit	Address	Comments related to Resettlement Need	Need for Resettlement During Repairs
Brenda Olivia White	5/15/2019	Wringley Street #1, Cole Bay	The repairs needed do not require resettlement.	No
Maritza Melfor	5/15/2019	Pear Road #26, St. Peters	If the handles of the windows can not be repaired then most of the windows need to be replaced. Depending on the replacement duration, resettlement may be needed. Consultation with the contractor and residents will be helpful.	May be needed.
Judith Angelia De Weever	5/7/2019	Walter J.A. Nisbet Road, Philipsburg	repair work is fairly minor: windows, doors, and gutters. The work can be finished without evacuating the residents.	NO
Ruby Caines	5/8/2019	Dr. Tjob Sie Fat Rd., Cole Bay	No one is living in the house during the assesement and therefore no need for resettlement.	NO
Joseph Lloyd	5/8/2019	Welfare Road, Cole Bay	minor repair work for this small house can be completed without evacuating the residents.	NO
Eric Jones	5/8/2019	Fort Hill Road, Fort Willem	temporary relocation of the small attachment unit (around 26m ² , NOT the entire house) would be needed to apply the plaster etc.	YES
Pearl Arnell	5/9/2019	A.J.C Brouwer Road, Cay Hill	uncertainty comes from the repair of the warped roof sheet. Based on the current visual assesement, relocation of the current residents is not necessary.	most likely no
Josianne Cannegieter	5/9/2019	Paradise Island Road, Madame's estate	No one is living in the house during the assesement and therefore no need for resettlement.	NO
Wilson Erwin Arrindell	5/9/2019	Impala Road, Cay Hill	No one is living in the house during the assesement and therefore no need for resettlement.	NO

Name	Date of Visit	Address	Comments related to Resettlement Need	Need for Resettlement During Repairs
Angelica Smith	5/10/2019	Boulanger Road, South Reward	Contractor should be able to perform the work without evacuating the house. The main work is to replace some windows and repair the roof ridge cap sheet.	NO
Ruby Cannegieter	5/10/2019	L.B. Scot Road, South Reward	Contractor should be able to perform the work without evacuating the house. The main work is to fixing the cracks and the leaking roof.	NO
Elane Theresa Illis	5/11/2019	King of the The Sea Road, Sucker Garden	repair work is outside of the house. Therefore, there is no need to evacuate the house.	NO

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