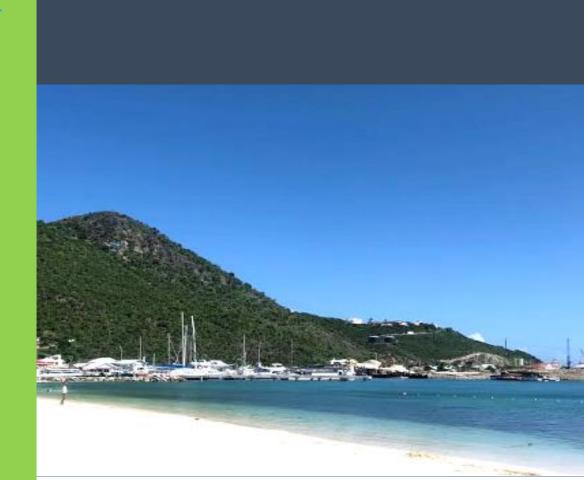# SINT MAARTEN

DIGITAL GOVERNMENT TRANSFORMATION PROJECT - P172611

Environmental and Social Management Framework

Version for Appraisal, July 9, 2020

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Abbreviations and Acronyms

ANG	Netherlands Antillean Guilder
EIA	Environmental Impact Assessment
EHSGs	Environmental Health and Safety Guidelines
ESF	Environmental and Social Framework
ESCP	Environmental and Social Commitment Plan
ESHS	Environmental Social Health and Safety
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
GRM	Grievance Redress Mechanism
GOSM	The Government of Sint Maarten
ICT	Information Commpunication Technology
LMP	Labor Management Procedures
MGA	Ministry of General Affairs
NRPB	National Recovery Program Bureau
NRRP	National Recovery and Resilience Plan
OHS	Occupational Health and Safety
OM	Operations Manual
SEP	Stakeholder Engagement Plan
SG	Secretary General
SPU	Special Project Unit
VROMI	Ministry of Public Housing, Spatial Planning, Environment and Infrastructure
WBG	World Bank Group

1. Introduction

This Environmental and Social Management Framework (ESMF) was drafted to mitigate any risks that may arise from implementation of the Digital Government Transformation project, ensuring implementation is in line with the 'do no harm' principle. The Digital Government Transformation project aims to enhance the efficiency, access, and resiliency of selected administrative public services for citizens and businesses.

The project is fully funded by the World Bank's Sint Maarten Trust Fund, which is financed by the Government of the Netherlands and administrated through a tripartite partnership of the Sint Maarten and Netherlands governments, and the World Bank.

1.1 Background

Following the devastation caused by hurricanes Irma and Maria in 2017, the Government of Sint Maarten (GOSM) renewed its commitment to digital government reforms aimed at fundamentally transforming how government interacts with citizens and the private sector, while also building resilience in the delivery of public services. The *National Recovery and Resilience Plan* (NRRP) outlines the recovery needs across the economy, the community and the public sector. The NRRP sets the Government's vision, principles, and a proposed approach for rebuilding a "better and stronger Sint Maarten." It aims at accelerating the restoration of the social and economic infrastructure, based on a consensus of all stakeholders, and following the "build back better" principle. The NRRP explicitly highlights the importance of interventions to strengthen government recovery and resilience in the wake of major disasters. It is in this context that the Digital Government Transformation project was developed.

An environmental and social assessment of the Project has been carried out in compliance with the World Bank Environmental and Social Framework (ESF) requirements. This ESMF has been prepared in collaboration with the World Bank Group (WBG) Safeguards Specialists. This ESMF presents potential environmental and social impacts and risks of the project, and the measures which will be applied to address those impacts and risks.

1.2 Contents of the Framework

In addition to this section the ESMF consists of the following Sections:
- **Section 2: Project Description**
  This section describes the activities carried out under the Digital Government Transformation project.
- **Section 3: Applicable GOSM Regulations and World Bank Environmental and Social Standards**
  This section describes the relevant policies of the Government of Sint Maarten (GOSM) and Environmental and Social Standards (ESSs) of the World Bank and how they have been considered while designing the Project and preparing this ESMF.
- **Section 4: Baseline Environmental and Social Conditions**
  This section describes the existing environmental and social condition of the project area.
- **Section 5: Environmental and Social Impacts and Risks**
  This section describes the environmental setting of the project area and potential environmental and social impacts and risks associated with the project activities. This section also describes proposed detailed management plans to address these impacts and risks and a monitoring plan.
- **Section 6: Project Institutional Arrangements and Capacity Building**
  This section describes the Project institutional arrangements for implementation of the ESMF.
- **Section 7: Stakeholder Consultations and Information Disclosure**
  This section describes the stakeholder engagement plan and details of consultations carried during the preparation of the Project.

2. Project Description

2.1 Components

The proposed project will improve the delivery of key public services through the digitization of business processes and help the Sint Maarten government in implementing its strategy for Digital Transformation.

Component 1: Strengthening the legal, regulatory and institutional environment

This component will strengthen the institutional and human capacity within the Government to manage digital transformation and will lay the groundwork for the platforms and digital services to be delivered under components 2 and 3.

> **Sub-component 1.1**: Institutional, legal and regulatory reforms. This sub-component will finance the following activities: (i) the institutional design and arrangements for managing digital Government transformation in Sint Maarten; (ii) the design of a dashboard to track progress on digital reforms in Sint Maarten; (iii) the design and implementation of a Government-wide Enterprise Architecture (EA), following established methodologies, and associated outputs for deploying the cross-cutting platforms required to enable digital service delivery; and (iv) the review, development and implementation of existing and new policies, laws, and regulations to enable and build trust in digital Government services and support the development of the digital economy, particularly (cybersecurity, cybercrimes, ICT procurement, data protection and privacy, digital payments and digital identity). This includes support for the institutions and agencies responsible for implementation and oversight of the enabling legal and regulatory environment.

> **Sub-component 1.2**: Change management and project management. This sub-component will finance:

> a) the services of a project management and technical advisory firm to help the NRPB and the Special Project Unit manage the technical implementation of this project and change management aspects of digital transformation;

> b) additional support for project coordination, monitoring, institutional strengthening to respond to citizen feedback to ensure accountability, fiduciary and safeguards tasks, as well as internal controls and audit for the project;

> c) the design and implementation of external communications and outreach programs; and (iv) the design and implementation of a digital literacy program for civil servants.

Component 2: Building digital platforms to enable service delivery

This component will focus on establishing the technical foundations for citizen-oriented services to be delivered under Component 3. By digitizing core Government records and mirroring critical service delivery platforms in the Cloud, this component will also contribute to increasing resilience by reducing the vulnerability of selected services to delivery disruptions due to cyberattacks and natural disasters and pandemics.

> **Sub-component 2.1:** Cross-cutting digital service platforms. This sub-component will fund the design and development of the following cross-cutting platforms:

> a) Digital Identity (Single Sign-On Platform): (i) Assessment of the Unique Identifier issued by the Civil Registry to design and implement an authentication platform with Single Sign On (identity and access management solution based on open standards) for accessing public sector services with appropriate security features and credential choice for users with

different levels of assurance (e.g. two-factor authentication); and (ii) Development of Standard Operating Procedures for identity recovery for adults and minors.

b) Electronic Payment Platform: (i) Development of the Electronic Payment Platform Technical Architecture; and (ii) Design and implementation of a payment interface, through integration with the Government's Instant Payment platform, that will support credit/debit card payment options for the e-services to be digitized.

c) Interoperability Platform: (i) Design of a technical, applications, and data architecture to identify the appropriate interoperability platform (anchored in the Enterprise Architecture); and (ii) Implementation of the interoperability platform to link critical registries including Civil Registry; CRIB (Tax ID); Social Registry (in development); Business Registry; Land Registry (cadaster) and the Address Registry.

d) Electronic Signatures Platform: (i) Design and implementation of electronic signatures for G2G, C2G and B2G transactions; and (ii) Technical evaluation of and recommendations for a whole-of-Government digital signatures platform.

Sub-component 2.2: System resilience and Records Management. This sub-component will finance the following activities:

a) Upgrades to system resilience to maintain business continuity during and after natural and man-made disasters and pandemics including procuring and implementing cloud services;

b) Technical assessment of key registries (i.e. data governance, software, hardware, data formats, duplication, etc.);

c) Hardware, software, and business process reengineering that will ensure harmonization of registries across Government; and

d) Hardware solutions and additional human resource capacity to register and digitally archive Government documents.

Sub-component 2.3: Just-in-time digital services. This sub-component will invest in "just-in-time" digital services and platforms that have not been planned, but that would be required to support emerging needs during implementation.

Component 3: User-centered public services

This component will enhance public service delivery in Sint Maarten by transforming and scaling-up the existing Public Service Centers (PSCs) to include additional public services offered through multiple channels.

Sub-component 3.1: Modernization of one-stop shops. This sub-component will leverage the existing PSCs located in Philipsburg and Simpson Bay and enhance their operations. Activities include:

a) assessment and implementation of recommendations to expand the scope and enhance customer orientation of the PSCs;

b) (ii) software and/or hardware upgrades;

c) iii) office furniture; and

d)   (iv) the development of continuity of operations procedures.

Sub-component 3.2: User-centric e-services. Activities financed under this sub-component include the re-design, development, and deployment of the following set of priority e-services1 through an Online Government Portal:

a)   Certificate of Good Conduct (Public Service Center);

b)   Change of Address (Civil Registry);

c)   Registration of a Death, Divorce or Marriage (Civil Registry);

d)   Building Permit Application (Department of Permits);

e)   Economic Licenses (Business, Director, Branch Licenses at Department of Economic Licenses); and

f)   Request for Vaccination Records (Collective Prevention Services).

Sub-component 3.3: This sub-component will improve the efficiency of and access to services offered by multiple service delivery channels including the PSC. It will also invest in:

a)   The design and launch of an Online Government Portal, which will serve as a single point of entry for information and transactions related to all public services;

b)   Kiosk machines for conducting services online;

c)   The design and implementation of a multi-channel customer service feedback mechanism; and

d)   The design and implementation of user-friendly mobile applications.

Component 4: Contingent Emergency Response Component

This component has zero funds allocated and can be triggered following a natural disaster or emergency. Once the requirements for activation have been met, uncommitted funds from the project can be reallocated immediately to this component and made available for crisis or emergency response to support the continuity of core public sector functions. The definition of the key aspects of this component will be detailed in the Project Operational Manual during project preparation which will be available for review on the project page of the NRPB website (https://nrpbsxm.org/digitalgov/).

2.2 Cost of the Project and Implementation Schedule

The total budget of the Project is US$12M with an implementation period of four years.

The first two months will consist of project start-up, with the onboarding of a management firm to support project management, procurement, and change management. Under component 1, a firm will be hired to execute upgrades to the Public Services Centers in line with the gap analysis. Functional and technical specifications will be developed for all ICT procurement packages under component 2. Under component 3, change management activities will commence immediately, as well as the legal and policy modifications needed to enable digital transformation across government.

The project is expected to commence activities in the end of 2020, following effectiveness of the legal agreement, and end in October 2024.

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[1] These services have been identified as high priority by the Government based on stakeholder consultations.

2.3 Resources and materials

All goods and services procured under the project will be directly implemented by the National Recoery Program Bureau (NRPB). The Ministry of General Affaris (MGA) will establish a Special Projects Unit to oversee implementation of the project. No works are anticipated.

All firms hired under the project will have procedures in place aligned with the Bank's labor management procedures. A comprehensive overview of staff is included in the Labor Management Procedures (LMP) for this project.

Any e-waste originating from the disposal of ICT hardware will be guided by e-waste management guidelinesfollowing provisions included in Annex 3.

3. Applicable Government Regulations and World Bank Environmental and Social Standards

3.1 Regulations and Standards

Applicable Policies, Legislations and Regulations of Government of Sint Maarten

Sint Maarten, previously part of the Netherlands Antilles, became an autonomous country within the Kingdom of the Netherlands on October 10, 2010. Sint Maarten has full autonomy for internal affairs, including environmental and labor legislation. The Dutch Government retains responsibility for defence and foreign affairs.

According to Article 22 of the 'Constitution of the Country of Sint Maarten,' it shall be a constant concern of the GOSM to keep the country habitable and to protect and improve the natural environment and the welfare of animals. Currently, the country has no comprehensive legislation related to environmental protection and no law for carrying out environmental impact assessment (EIA) for any development projects. Should the GOSM establish any relevant legislation or ordinances on environmental protection during the implementation of this Project, the Special Project's Unit commits to, after consultation with World Bank, adhere to these policies. If new legislation leads to additional costs or impediments to carry out the Project, renegotiation will start with the World Bank.

The Government has some existing policies and regulations on the management of waste and labor issues. These regulations and their applicability to the Project are discussed in the following sections.

3.1.1   Waste Ordinance

The Sint Maarten Waste Ordinance of February 23, 1993, provides regulations regarding the collection and disposal of residential waste, bulky waste, liquid waste, commercial waste, car wrecks and other categories of waste. While e-waste is not explicitly mentioned as a category of waste under the ordinance there are provisions for the establishment of other categories of waste. The project may work with the Government of Sint Maarten on the preparation of an e-waste policy that will guide the actions of the government in disposing of waste generated from ICT activities.

3.1.2   The Labor Legislation

The Labor Legislation describe provisions concerning the work-times, periods of rest, overtime, nightshift, standby shift, holidays, 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.[2]

According to this Legislation, children under the age of 15 years are prohibited from working, whether or not in exchange for wages of compensation, and youth between 15 and 18 cannot perform dangerous

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[2] Website on Labor Regulations of GOSM:
http://www.sintmaartengov.org/government/VSA/labour/Pages/Labour-Legislation.aspx

work. The Ministry of Public Health, Social Development & Labor also endorses[3] that children ages 16 and older are allowed to 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 project requires technical staff with skills that require experience and education, which will not be possible for children or those below the age of 18 to possess. The issues of migrant and seasonal workers, labour influx or gender-based violence do not apply. A register of all persons under the age of eighteen years employed by the project and the dates of their births will be kept in keeping with the Employment Act of Sint Maarten. No person under the age of eighteen years shall be employed or allowed to work between the hours of 9.00 p.m. to 6.00 a.m.

The head or director of an enterprise has an obligation to report occupational injuries to the Department of Labor and the police. The injuries should be reported as soon as possible, but no later than 24 hours. For the reporting of injuries, but also other labor-safety matters, the following should be contacted:
- Department of Labor/Safety Inspection, Kanaalsteeg 1, Philipsburg | Sint Maarten, D.C., Phone: +1-721-5422059/5422079.

All firms to be procured under the project will be responsible for complying with the Labor Regulations.

3.1.3   National HIV and AIDS Workplace Policy

The purpose of the National HIV and AIDS Workplace policy is to ensure a uniform and fair approach to the effective prevention of new HIV infections among employees, their families and dependents, and provide social protection within the workplace to employees directly impacted by HIV. The principles of the policy are aligned to the International Labor Organization (ILO) Code of practice on HIV/AIDS and Recommendation No. 200 concerning HIV and AIDS and the World of Work and include the recognition of HIV as a workplace issue, non-discrimination in employment, no screening, no forced disclosure, protection of confidentiality, social dialogue, gender equality, HIV prevention, treatment, care and support measures as critical components for addressing the epidemic in the workplace.

The National HIV and AIDS Workplace Policy is relevant for both Special Projects Unit staff and firms procured under the project.

3.2 Relevant Administrative Framework

3.2.1   National Recovery Program Bureau

The National Recovery Program Bureau (NRPB) will be the primary implementing agency of the project. The NRPB, on behalf of the Government of Sint Maarten, is responsible for the preparation, implementation and evaluation of the projects that are financed by the Sint Maarten Recovery, Reconstruction and Resilience Trust Fund.

3.2.2   Ministry of General Affairs

The Ministry of General Affairs (MGA) is the technical counterpart for the project. It is the central coordination and facilitation entity of government. The following departments fall under the MGA:

- Legal affairs and legislation;
- Interior Affairs and Kingdom Relations;
- Foreign Relations;
- Public Service Center;
- Records and Information Management;
- Facilitation Services;

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[3]
http://www.sintmaartengov.org/government/VSA/labour/Documents/Fundamental%20Rights%20of%20the%20Worker%20poster.pdf

- Personnel and Organization;
- Information Communication Technology;
- Civil Registry
- Fire and Disaster Management

3.2.3   Department of Labor

The Department of Labor is charged with the tasks concerning labor. The Department of Labor has the following tasks:

- Formulating policy memorandums and recommendations and making proposals for the development, adjustment, monitoring and implementation of national policy concerning labor and the policy regarding safety and labor inspection;
- Preparing, implementing and monitoring the national legislation concerning labor and monitoring the compliance with this legislation;
- Promoting international, social and labor affairs, such as the relationship with the International Labor Organization.

The Labor Affairs Agency is the executing division of the Department of Labor and they are tasked with monitoring compliance with the labor legislation and settling complaints resulting from the labor relations between employers and employees.

3.3 World Bank Environmental and Social Standards

The World Bank Environmental and Social Framework sets out the World Bank's commitment to sustainable development, through a Bank Policy and a set of ESSs that are designed to support Grantee' projects, with the aim of ending extreme poverty and promoting shared prosperity.

The Environmental and Social Standards set out the requirements for the Grantee (in this case, the NRPB) relating to the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The Bank believes that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Grantee in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens.

The standards will: (a) support Grantee in achieving good international practice relating to environmental and social sustainability; (b) assist Grantee in fulfilling their national and international environmental and social obligations; (c) enhance non-discrimination, transparency, participation, accountability and governance; and (d) enhance the sustainable development outcomes of projects through on-going stakeholder engagement.

The ten standards which comprise the ESF, are described in the following sections and and summarised in **Table 3.1** below:

ESS 1: Assessment and Management of Environmental & Social Risks and Impacts

ESS 1 sets out the NRPB's responsibilities for assessing, managing and monitoring environmental and social risks and impacts associated with each stage of the project in order to achieve environmental and social outcomes consistent with the ESS's.

ESS 2: Labor and Working Conditions

ESS 2 sets out the NRPB's responsibilities to promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. The objectives of ESS 2 are:

- To promote safety and health at work;
- To promote the fair treatment, non-discrimination and equal opportunity of project workers;

- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate;
- To prevent the use of all forms of forced labor and child labor;
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and
- To provide project workers with accessible means to raise workplace concerns.

The Project will hire Direct Workers and Contracted Workers as defined in the Labor Management Procedures (LMP) which have been developed and are available on the project page of the NRPB website (https://nrpbsxm.org/digitalgov/).

- Consultants to the Special Projects Unit in the MGA are Direct Workers because component 3 will support their salaries and benefits during the implementation of the project. These workers consist mainly of technical staff with qualifications in ICT, change management, and monitoring and evaluation. Internationally deployed staff will also work in accordance with local labor laws but have in addition a handbook for delegate deployments, which applies to all staff across the world.
- A management firm will be hired to support the day-to-day implementation of the project. This firm will be considered contracted worker and as such the LMP will apply to the firm.
- Additional ICT and management consulting firms will be hired to support project activities and the LMP will apply to them as direct workers.
- Personnel from the Island are Contracted Workers, hired through a local firm to carry out scanning of paper documents. Local staff will be hired according to in accordance with Sint Maarten labor laws.
- Workers under the age of 18 will not be permitted in the implementation of the Project.

ESS 3: Resource Efficiency and Pollution Prevention and Management

This ESS sets out the requirements of the Grantee to address resource efficiency and pollution prevention and management throughout the project life cycle consistent with Good International Industry Practice. Objectives of ESS 3 are:

- To promote the sustainable use of resources, including energy, water and raw materials;
- To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities;
- To avoid or minimize project-related emissions of short and long-lived climate pollutants;
- To avoid or minimize generation of hazardous and non-hazardous waste;
- To minimize and manage the risks and impacts associated with pesticide use.

While the project does not envisage any significant waste caused by the disposal of old hardware and IT systems, e-waste management guidelines may be developed at the request of the government through the project.

ESS 4: Community Health and Safety

ESS 4 considered relevant for the project. The Government will take every measure to avoid COVID-19 transmission that may be associated with workers on the project by abiding by the Government of Sint Maarten COVID 19 Guidelines which are already in place and are also referenced in the ESMF. Stakeholder engagement consultations will be held according to Government restrictions on COVID 19.

ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Not relevant for the Project.

ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

Not relevant for the Project.

ESS 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

Not relevant for the Project.

ESS 8: Cultural Heritage

Not relevant for the Project.

ESS 9: Financial Intermediaries

Not relevant for the Project.

ESS 10: Stakeholder Engagement and Information Disclosure

This ESS recognizes the importance of open and transparent engagement between the NRPB and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

The NRPB will engage with stakeholders as an integral part of the project's environmental and social assessment and project design and implementation. Several consultations were held since August 2019 to as part of project preparation. These included with semi-government agencies that provide services; an information sharing with select Secretary Generals form all ministries; Telecommunications providers; direct email solicitation and feedback request on project on Facebook. As per the project requirements, the ESF documents were published on the NRPB website on June 17,2020. The project press release which included a call for feedback was sent to 62 print and online news media on June 24th. The publication of the ESF documents on the NRPB website, on social media platforms, and online news platforms and print media included a link to an online feedback form to allow respondents to provide input into the finalization Activity Log. The survey form requesting feedback from beneficiaries was also emailed to 35 representatives within Government.

3.4 Actions Taken to Comply with ESS's Requirements of the Project

Table 3.1 Describes the World Bank ESS's requirements for the Project and actions taken by the MGA to comply with the ESS requirements.

Table 3.1: World Bank ESS's Requirements Actions Taken

ESS	Relevance	Requirements of ESS	Actions taken (or to be taken) to comply with ESS requirements
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts	Relevant to this project	Conduct an environmental and social assessment of the proposed project to assess the environmental and social risks and impacts of the project throughout the project life cycle. The assessment will be proportionate to the risks and impacts of the project.	Project Environment and Social Risks are considered Lowe. The project will prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).
		Undertake stakeholder engagement and disclose	The NRPB regularly engages its stakeholders through various channels throughout the project. The ESMF and the SEP have been disclosed and inputs were received and the revised versions are

ESS	Relevance	Requirements of ESS	Actions taken (or to be taken) to comply with ESS requirements
		appropriate information in accordance with ESS 10.	available on https://nrpbsxm.org/wp-content/uploads/2020/06/DGTP_ESMF-v2.pdf Section 7 describes the stakeholder engagement details.
		Develop an ESCP, and implement all measures and actions set out in the legal agreement including the ESCP.	The NRPB has developed an Environmental and Social Commitment Plan (ESCP) and will implement all actions proposed in the ESCP.
		Conduct monitoring and reporting on the environmental and social performance of the project against the ESS's.	The NRPB will be responsible for overall oversight of social and environmental safeguards, however the technical and practical regular monitoring of actions proposed in the ESMF and ESCP will lie with the Special Project Unit. The Special Project Unit will, together with NRPB, prepare quarterly monitoring reports and submit them to the World Bank.
		The Grantee will undertake a process of meaningful consultation of the project's risks and impacts in a manner that provides stakeholders with opportunities to express their views on project risks, impacts and mitigation measures.	This ESMF has been disclosed on the NRPB website. Input from any feedback originating in the consultation phase is deliberated in the project team for feasibility of implementing. Any suggestions will be included in the final ESMF and results of suggestions will be fed back to project design and to relevant stakeholders. A report on the stakeholder disclosure and consultations can be found in Annex 4.
ESS 2: Labor and Workers Condition	Relevant to this Project	The Grantee will develop and implement Labor Management Procedures applicable to the Project.	Labor Management Procedures (LMP) have been developed and are available on the project page of the NRPB website (https://nrpbsxm.org/digitalgov/).
		A child under the minimum age will not be employed or engaged in connection with the project.	The Project will not employ any workers under the age of 18.
		Measures relating to occupational health and safety (OHS) will be applied to the project. The OHS measures will include the requirements of this Section and will take into account the General Environmental Health and Safety Guidelines (EHSGs) and, as appropriate, the industry-specific EHSGs. MGA, under the auspices of NRBP, has identified a service provider to be contacted in cases of GBV and SEA and will support referrals for GBV and SEA victims.	This ESMF includes measures related to occupational health and safety of workers NRPB has adopted a Code of Conduct that to guide the conduct of all workers contracted under the project including with regard to Sexual Harassment and Exploitation in the workplace. The Code of Conduct can be found in Annex 5. The Labor Management Procedures (LMP) includes a grievance mechanism for employees.

ESS	Relevance	Requirements of ESS	Actions taken (or to be taken) to comply with ESS requirements
ESS 3: Resource Efficiency and Pollution Prevention and Management	Relevant to the Project	Resource Efficiency: The Grantee will implement technically and financially feasible measures for improving the efficient consumption of energy, water and raw materials, as well as other resources.	The NRPB will implement efficiency measures related to the efficient use of technology, minimising any wastage of materials, additional and unnecessary creation of waste, and unnecessary transportation. This is achieved by listing requirements for meeting energy efficiency standards in contract documents for any major hardware acquisitions.
		The Grantee will minimise the generation of waste including non-hazardous waste and manage the waste that is safe for human health and the environment. If the project involves pest management measures, the Grantee will give preference to integrated pest management practices.	Any e-waste that is produced as a result of the project will be collected and disposed of according to appropriate e-waste guidelines. An example of such guidelines can be found in Annex 3.
ESS 4: Community Health and Safety	Is considered relevant to the Project.		The Government will take every measure to avoid COVID-19 transmission that may be associated with workers on the project by abiding by the Government of Sint Maarten COVID 19 Guidelines which are already in place and are also referenced in the ESMF. Stakeholder engagement consultations will be held according to Government restrictions on COVID 19.
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Not relevant to the Project		
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Not relevant to the Project		
ESS 7: Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities	Not relevant to the Project		
ESS 8: Cultural Heritage	Not relevant to the Project		
ESS 9: Financial Intermediaries	Not relevant to the Project		
ESS 10: Stakeholder Engagement and Information Disclosure	Relevant to the Project	The Grantee will identify the different stakeholders of the project, both project-affected parties and other interested parties.	The SEP describes the different stakeholders of the project and how they will be engaged through the project

ESS	Relevance	Requirements of ESS	Actions taken (or to be taken) to comply with ESS requirements
		The Grantee has developed a Stakeholder Engagement Plan (SEP) and will seek the views of stakeholders on the SEP The plan will be disclosed prior to project appraisal and consulted on.	The SEP has been disclosed on the NRPB website (https://nrpbsxm.org/wp-content/uploads/2020/07/DGTP_SEP-v3.pdf) Please see SEP consultations in the ESMF Annex 4.
		Prior to project appraisal the Grantee will disclose project information to allow stakeholders to understand the risks and impacts of the project.	This ESMF has been disclosed on the NRPB website and its availability communicated through notifications in the Daily Herald (June 26) and in social media including the Facebook pages of the Public Service Center (PSC) and Government of Sint Maarten (GoSXM). Full details can be found in Annex 4.
		The Grantee will maintain, and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not.	Stakeholder feedback has been sought and comments received have been included in this ESMF. Additional consultations will be carried out. As such, an updated ESMF will be released during project implementation.
		The Grantee will implement a grievance mechanism to receive and facilitate the resolution of concerns and grievances from the project related parties related to the environmental and social performance of the project in a timely manner. Prior to project appraisal the process and means by which grievances can be raised and will be addressed and will be shared.	A Grievance Redress Mechanism will be put in place to receive concerns and grievances which arise from the project. The Grievance Redress Mechanism has been shared online as part of the SEP and consulted on during stakeholder consultations.

4 Baseline Environmental and Social Conditions

4.1 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 neighbouring island territories include Anguilla, St. Kitts and Nevis and St. Barthélemy. The total land area

of the entire island is 90 km^2 (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.

4.2 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 to 37 °C during the day from June to November. Average monthly weather data of Sint Maarten is given in Table 4.1.

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 4.1: 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

4.3 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, intense storms and numerous hurricanes: Donna in 1960 (Category 3), Luis in 1995 (Category 4), Lenny (1999) 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.

4.4 Biological Environment

The major part of Saint Maarten is covered with secondary vegetation derived from either seasonal formations or dry evergreen formations[4]. 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 also have scenic value.

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 jamaicensis*) and two kinds of reptiles, the Antillean Iguana and the 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 in the

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

vicinity of the island. Sint Maarten is classified as an important breeding area for seabirds. Several small rocky islands just offshore accommodate breeding colonies of seabirds.

4.5 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. In addition to the 38,000 registered inhabitants, there is a significant group of unregistered migrants, estimated to be between 10,000 and 15,000 people.

Tourism and tourism-related industry is the major source 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 1,115) per month. Literacy rate in people over the age of 14 is 95.8%.

In 2017, Hurricane Irma severely damaged the economy of the country. Sint Maarten's 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 experienced a significant loss of capital due to the impacts of the hurricane.

5   Potential Risks and Impacts of the Project and their Management

5.1 Overview of Potential Risks and Impacts

The Project will be implemented at the national level. It will finance the deployment of consulting and advisory services, hardware acquisition, capacity building and training activities.

The project is expected to have positive impacts on society, communities, and the environment. All citizens of the country including the vulnerable, differently abled, women and elderly people are intended to benefit given the envisaged improvements in access to public services. The Project's Environmental and Social risks and impacts have been assessed and categorized as Low. Consulting and advisory services, capacity building and training to be financed under Components 1, 2 and 3 are not expected to have environmental impacts. Minor environmental risks associated with the disposal of e-waste, however, the volume of e-waste expected from the project is not significant. Any e-waste generated will be collected and shipped out of the island following provisions defined in the Project's Environmental and Social Management Framework as Sint Maarten lacks public ordinances that regulate the management of e-waste and Sint Marten's municipal solid waste land fill lacks facilities to dispose of these types of wastes. The project does not include constructions works . The Environment and Social risks outlined in this framework will be addressed below. . NRPB is in the process of strengthening its capacity to manage the environmental and social policies and two additional E&S staff (one for environment and one for social) will be hired by the NRPB board before project effectiveness.   The NRPB will also hire a Communications/E&S Specialist for the SPU who will be guided by the NRPB safeguards staff. The World Bank will provide additional support through project implementation.

Risks:

Disadvantaged/*vulnerable individuals or groups*

The Bank classifies the social risk of the Project as "Low". The envisaged improvements in access to public services are intended to benefit all citizens of the country. Groups considered disadvantaged or vulnerable are the poor, elderly, homemakers, at-risk youth, persons with basic educational levels, or lack digital skills and access to technology may be left out of consultations and project benefits if extra measures are not taken to insure they are consulted and their needs considered in project design. The key social risks

are related to: (i) risks of exclusion of poorer citizens cannot receive information and/or access governments services through digital platforms and fully participate in the new digital economy and (ii) the limited capacity of the Borrower to mitigate social risks in the current COVID context. These risks will be mitigated through the proposed upgrading and scaling up of existing public service centers; accessing of public services through multiple channels, including online, portable kiosks machines and user-friendly apps online. A Stakeholder Engagement Plan has been prepared and will be implemented throughout the life of the project to ensure continuous information sharing and to receive feedback from the public. The NRPB will hire an Communications and E&S Specialist to assist SPU with the monitoring of the safeguards and the communications. The Stakeholder Engagement Plan has a strategy to reach vulnerable groups. Another notable obstacle that can prevent persons from participating in the planned project is the language barrier. Although Dutch and English are the official languages, others are also common including French, Spanish, Creole Papiamento. The MGA SPU Communications Officer will ensure there is a translator given languages spoken on the island including English. SEP information will be translating the information in various languages can assist in the digital divide.

The project will make special provisions to gather the views and inputs of vulnerable or disadvantaged groups. The following mechanisms will be used: Telephone calls/Zoom; Large print; News paper; Elderly Persons and other Representative Organizations; and Flyers on community boards.

Labor Management. To avoid risks associated with mismanagement of labor conditions, all project workers, as defined by ESS2 on Labor and Working Conditions, will be hired and/or are able to benefit from the applicable labor management principles consistent with the requirements of ESS2. The Operations Manual (OM) will also provide guidance on requirements to be incorporated in terms of reference, contracts, and reporting mechanisms to ensure that the activities and outputs are in line with ESS2. The LMP will be part of the Operational Manual.

Sustainable use of resources efficiency and pollution. The Operations Manual will include provisions to secure full compliance with applicable regulations and specifications for energy efficient equipment and electronic waste management. E-waste management guidelines have been included in the annex of the ESMF. ESS5, ESS6, ESS7, ESS8 and ESS9 are not considered relevant.

Regarding ESS10 on Stakeholder Engagement and Information Disclosure, the MGA has developed a SEP to identify the key stakeholders. The SEP includes specific measures to allow continuous engagement and adequate communication strategy throughout the Project implementation.

6 Project Institutional Arrangements and Capacity Building

6.1 Institutional Arrangements for Project Implementation

The NRPB will be the implementing agency for the project. NRPB will be responsible for reporting and monitoring and evaluation, financial management, contracts management, safeguards oversight, and procurement processing. The NRPB will work in close coordination with the Ministry of General Affairs (MGA).

The Ministry of General Affairs will create a Special Project Unit (SPU), that will be the primary technical counterpart for the project. The SPU will be led by a project manager and the Unit will report to the Secretary-General (SG) of the MGA and work closely and collaboratively with the NRPB to implement the project. While the NRPB will handle all fiduciary tasks including signing and managing all contracts, the SPU will be responsible for the technical and project management aspects of the project. The SPU will convene inter-ministry committees for specific cross-cutting activities that will be identified once the SPU is in place. The NRPB will work with the SPU for reporting to the World Bank. Under component 1, the institutional design and arrangements for managing digital government transformation will be in place in year three or four of the project to steer the digital government activities beyond the project.

NRPB will contract a management firm to support the SPU and NRPB in the overall implementation of the project. The management firm will help build ICT technical and digital skills and perform day-to-day technical implementation, contract supervision and project management activities in collaboration with the SPU and NRPB. The management firm will also perform tasks related to the technical aspects of ICT procurement (development of terms of references, specifications, bidding documents) and provide quality control of deliverables, collect information and prepare monitoring and evaluation (M&E) reports, and support ICT implementation.. An organogram of the project staffing is attached as Annex 1.

Multiple levels of institutional checks are standard, such as segregation of duties between implementing staff, managing staff, finance staff and logistics staff.

Multiple levels of institutional checks are standard, such as segregation of duties between implementing staff, managing staff, finance staff and logistics staff.

6.2 Institutional Arrangements for ESMF Implementation

The NRPB has the overall oversight responsibility for the environmental and social safeguards. The SPU monitors the E&S on a day-to-day basis through the Communications and E&S Specialist.. As such, The NRPB will provide oversight of ESF implementation of the project and any support to the Communications E&S Specialist . The project manager of the Special Project Unit has overall technical responsibility for the Project, and therefore also for the implementation of the ESMF. Certain aspects, however, may be delegated to staff in the Special Project Unit for more regular managing and monitoring. The project manager is responsible for delegating tasks, but also for following up and ensuring tasks (such as monitoring) are adequately executed.

Roles and responsibilities of relevant Project staff in environmental and social management of the Project are given in **Table 6.1**.

Table 6.1: Roles and Responsibilities in Environmental and Social Management of the Project

Staff	Responsibilities
Project Manager & Assigned Staff of the Special Project Unit (i.e. communications/ESF Person)	• Assist in drafting the Environmental, Social, Health and Safety requirements in accordance with the ESMF and integrating the ESMF into the contract documents. • Implement the Environmental Social Commitment Plan. • Prepare and submit to the NRPB quarterly monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including, the implementation of the ESCP and the ESMF, stakeholder engagement activities, status of complaints received by the grievance mechanism(s), and other aspects of monitoring ESHS as detailed in the ESMF.

Staff	Responsibilities
	• Provide sufficient detail regarding the incident or accident to NRPB, indicating immediate measures taken or that are planned to be taken to address it, whilst taking into account relevant data protection and privacy laws. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. • Implement the Labor Management Procedures (LMP) that have been developed for the project. • Implement (gender-based violence) GBV and sexual exploitation and abuse (SEA) prevention measures underlined in the ESMF, including a Code of Conduct and informing Project affected communities about GBV and SEA risks. • Manage the grievance mechanism for the project, as described in the SEP.
NRPB	• Overall oversight of ESF implementation of the project • Periodic monitoring of ESCP (every 6 months) • Support to the Special Project Unit on cross-cutting ESF issues, capacity building and sharing of templates • Investigate and report all incidents related to environmental, social and health aspects. Carry out root cause analysis for all major incidents, and recommended actions to be taken to rectify the failure that led to these incidents. • Prepare and submit to the Bank quarterly monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including, the implementation of the ESCP and the ESMF, stakeholder engagement activities, status of complaints received by the grievance mechanism(s), and other aspects of monitoring ESHS as detailed in the ESMF. • Promptly notify the Bank of any incident or accident related to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, such as possible impact of natural hazards during Project implementation or any violations of the Code of Conduct.

6.3 Capacity Building and Training

All consultants hired under the project will be sensitized during the initial stages of the Project implementation on the management of the environmental and social issues of the Project and to build the requisite capacities.

7 Stakeholder Engagement and Information Disclosure

7.1 Stakeholders of the Project (SEP)

The project has a broad range of stakeholders, who will be either directly or indirectly impacted by project activities. These stakeholders are broadly categorised in to the following two categories in accordance with ESS 10:

- **Project-Affected Parties**: direct beneficiaries, suppliers, government institutions
- **Other Interested Parties**: wider community and general public, community-based organisations and local NGOs, community councils, NRPB and the WBG.

7.2 Stakeholder Engagement

A SEP has been prepared and publicly disclosed. The Communications Officer, as well as the project manager of the Special Projects Unit, are responsible for regularly communicating with the stakeholders through the following mechanisms:

- **Press releases through printed media**
- **Government Information Page**
- **Radio stations**
- **Social media**
- **Printed and distributed: posters, brochures and flyers**
- **Direct meetings**
- **Virtual workshops/meetings**

During the preparation of this project drafts of the safeguard documents will be publicly disclosed on the NRPB's website and consultations with some stakeholders were held. Details and issues discussed are summarized in the table below:

Stakeholder Consultation Process

Date	Activity
August 2019	Meetings were held with other semi-government agencies who provide services on behalf of government or may be dependent on government services as well.
October 2019	A Workshop/Masterclass was also held involving a cross-sector of government and semi-government agencies.
February 2020	During the World Bank Mission, A sensitization meeting was held with Secretary general's from all ministries during which the project objectives were conveyed.
February 2020	Meeting with Telecommunications providers on Island to determine the status of plans and/or activities toward the establishment of a Government Wide Area Network (WAN)
Jun 17 2020	DigiGov project page live. ESF documents published on NRPB website, PSC Facebook page and GoSXM facebook page.
June 19 2020	Stakeholder Consultation planning commenced
June 23 2020	Stakeholder planning meeting convened
June 24 2020	Press release published on the single print newspaper (Daily Herald) and on a number of online media platforms.
June 26 2020	Direct email solicitation for ESF feedback

While the response was low the few comments received were overall supportive. These included that: (a) the project consider part-time employment options for persons 16 and older so as to build digital skills of that age group; (b) requesting more clarity on the operationalization of the CERC and negative list of activities to be excluded from financing; and (c) query on the types of capacity building and training to be provided under the projects and welcoming of the increase in transparency with regard to registering of business and individuals to reduce fraud. The project will regularly consult with these relevant stakeholders to help gather feedback, provide training, facilitate utilization and improve uptake.

The Stakeholder Engagement Plan, including a Grievance Redress Mechanism for the overall project ahs been prepared and disclosed. The Project will adopt the Grievance Redress Mechanism (GRM) established by the NRPB

in November 2018.   The NRPB GRM is used by other Bank projects. Complaints pertaining to the Project will be received at the offices of the NRPB and handled by its legal officer nwho will ons end the complaint to the MGA SPU Project Manager. The E&S and Communications manager in the MGA SPU will follow up on the complaint. In addition, the project will finance activities related to establishing a citizen feedback mechanism for the Public Service Centers (PSC). This work will be closely coordinated with the office of the Ombudsman, which receives complaints against government from citizens.

7.3 Grievance Redress Mechanism (GRM)

The NRPB has an existing GRM in place to fairly, efficiently and effectively handle concerns and grievances received from the Project's stakeholders. The Project will leverage the NRPB's GRM in the design of its arrangements. The system is well established and provides a credible avenue for all Project beneficiaries and stakeholders to file their complaints during the Project's implementation. Complaints received by the NRPB will be reviewed and forward to the SPU.

The NRPB has the overall responsibility for the GRM as the implementing agency for the project. When a complaint is received relating to the Project the NRPB will relay the complaint to the Project Project Manager within the SPU located in the MGA will be tasked w with the follow-up.The Project Manager will be supported by the SPU's Communications & Environmental and Social Specialist, who will be designated as the key officer in charge of the GRM. This person will have the following responsibilities:

- Coordinate the GRM prior to the commencement of Project activities and resolve issues;
- Create awareness of the GRM amongst all the stakeholders through building public awareness;
- Regularly contact the NRBP for receipt of complaints, receive the complaints made and facilitate the redressal of all grievances by coordinating with the concerned parties;
- Act as the focal point on grievance redressal issues and facilitate access to all Ministries/Agencies and Departments;
- Assist in Redressal of all Grievances by coordinating with the concerned parties;
- Maintain information and prepare progress reports of grievances and redressal, and;
- Monitor the Project's activities of contractors and consultants on redressal of grievances.

An example of a grievance log is attached as Annex 2, and the Special Projects Unit will be responsible for ensuring complaints are responded to and followed up on by the most appropriate party. The GRM is described in more detail in the Stakeholder Engagement Plan. The contact details for filing complaints will be posted at the Public Service Centers in Phillipsburg and Simpson Bay, and are:

- Via an online form available on the NRPB's website; https://nrpbsxm.org/complaints-procedure/
- By email to complaints@nrpbsxm.org with the complainant's project name "Digital Government Transformation Project" as the email's subject;
- By mail to:
    National Recovery Program Bureau
    #57 Walter A. Nisbeth Road
    Philipsburg
    Sint Maarten
- In person at the address above where the person will be given a complaint form to complete.

Secondly, there is a GRM specifically for labor related complaints. Details of the GRM for consultants are included in the Labor Management Procedures (LMP). These GRMs will receive and respond to complaints prior to and during the project implementation.

7.4 Consultation Meetings on the ESMF and Feedback

The project team has conducted focus group sessions regarding the design of the project. Inputs received are regularly recorded, and the proposed scope of work, risks and mitigation measures will be adjusted if necessary, and a revised ESMF will be publicly disclosed online. Any updated version will be shared with the World Bank for approval prior to public disclosure by both the Bank and the NRPB. The ESMF will be a living document and may be updated as conditions or the project change. Consultation meetings will also be carried out; the details of these broader consultations and engagement with direct beneficiaries are included in the Stakeholder Engagement Plan.

COVID 19 – Special considerations: If stakeholder engagement activities during preparation and implementation of the project occur at a time when risks associated with COVID 19 are still prevalent, then proper measures in accordance with national laws and regulations, and international good practice will be applied. Bank guidance will be provided in accordance with the 'Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings March 20, 2020.

7.5 Access to Information

The NRPB is committed to providing information to direct stakeholders, government agencies, beneficiaries as well as the wider general public on Sint Maarten of on-going activities. This will take place through regular updates via various media channels as listed in the SEP, through a variety of beneficiary feedback mechanisms. Finally, anyone can request specific feedback or post specific questions through a variety of social media and direct communication channels as listed in the feedback mechanism in the SEP. In principle, all information in the Special Projects Unit is open to the public, with the exception of personal identifiable data, or information that can be traced back to individuals (both of the public, and of internal staff).

Annex 1 Governance and Implementation Arrangements

Prime Minister & Minister of MGA

SG MGA

Project Oversight Committee

NRPB

NEW
Special Project Unit

Management Firm

Roles and responsibilities
- M & E
- Coordination
- Financial Management
- Procurement
- Contract Management
- Safeguards Support
- Build project management capacity of SPU

Roles and responsibilities
- Digital strategy oversight
- PSC revamping
- Digital Roadmap support
- Coord. of digital community
- Report directly on/communicate digital strategy progress
- Change management
- Knowledge management

Oversee technical committees
- Cybersecurity
- Data sharing
- Service Delivery
- Payments
- Digital Identity
- Interoperability

Project management and implementation
- Develop workplans
- Implement all activities
- Manage vendors
- Support procurement processes
- Quality control of deliverables
- Secretarial support to SPU to report to POC
- M&E
- Capacity building

Annex 2 Example of Grievance Redress Mechanism Log

Date complaint received and by whom.	Stakeholder type	Grievance Owner name if provided	Grievance Description	Outcome	Please indicate if outcome 'accepted' or 'not accepted' by complainant.	Actions/ Notes

Annex 3. E-Waste Guidelines

E-Waste Environmental Health and Safety Guidelines

Recommended Procedures

1. **General E-Waste Management**

The following guidance applies to the management of non-hazardous and hazardous e-waste. Additional guidance specifically applicable to hazardous e-wastes is presented below. E-waste management should be addressed through an e-waste management system that addresses issues linked to e-waste, which include generation, waste management (reduction, reuse, recycling), transportation, disposal, and monitoring.

As part of the E-waste Management Plan, e-waste should be characterized according to composition, sources, types of e-waste, generation rates, and local legislation. Effective planning and implementation of e-waste management strategies should include: i) Revision of new e-waste sources during all project phases including planning, siting, and equipment upgrades, in order to identify e-waste generation, pollution prevention opportunities, and necessary treatment, storage, and disposal infrastructure; ii) Collection of data and information about the process and e-waste streams in existing facilities, including characterization of e-waste streams by type, quantity, and potential use/disposition; iii) Establishment of priorities based on a risk analysis that takes into account the potential Environmental Health and Safety (EHS) risks during the e-waste cycle and the availability of the infrastructure to manage the e-waste in an environmentally sound manner; iii) Definition of opportunities for source reduction, as well as for reuse and recycling; iv) Definition of procedures and operational controls for onsite storage; and, v) Definition of options/procedures/ operational controls for treatment and final disposal.

2. **E-Waste Prevention Processes**

This should be designed and operated to prevent, reduce or minimize, the quantity of e-waste generated and hazards associated with the e-waste generated in accordance with the following strategy: i) Substituting raw materials or parts with less hazardous or toxic materials, or with those where processing generates a lower e-waste volume; ii) Adopting and implementing good housekeeping and operating practices, including inventory control to reduce the amount of e-waste resulting from materials that are out-of-date, off-specification, contaminated, damaged, or are an excess to operational needs; and, iii) Reducing/minimizing hazardous e-waste generation by implementing stringent e-waste segregation to prevent the commingling of non-hazardous and hazardous e-waste from be managed.

3. **Recycling and Reuse**

In addition to the implementation of e-waste prevention strategies, the total amount of e-waste may be significantly reduced through the implementation of reuse and recycling plans, which should consider the following elements: i) Identification and reuse/recycling of products that can be reintroduced into the operational processes ii) Investigation of external markets for recycling by other industrial processing operations located in the neighborhood or region of the facility (e.g., e-waste exchange); iii) Establishing reuse/recycling objectives and formal tracking of e-waste generation and recycling rates; and, iv) Providing training and incentives to employees in order to meet objectives.

4. **Treatment and Disposal**

If e-waste materials are still generated after the implementation of feasible e-waste prevention, reduction, reuse, recovery, and recycling measures; then, e-waste materials should be treated and disposed of following all measures to avoid potential impacts to human health and the environment. Selected management approaches should be consistent with the specifications of e-waste characteristics and local regulations, and may include one or more of the following: i) On-site or off-site chemical, or physical treatment of the e-waste material to render it non-hazardous prior to final disposal; ii) Treatment or disposal at permitted facilities specially designed to receive the e-waste; iii) Permitted and operated landfills or incinerators designed for the respective type of e-waste or other methods known to be effective in the safe, final disposal of e-waste materials.

5. Hazardous E-Waste Management

Hazardous e-waste should always be segregated from non-hazardous e-wastes. If the generation of hazardous e-waste cannot be prevented through the implementation of the above general e-waste management practices, its management should focus on the prevention of harm to health, safety, and the environment, according to the following additional principles: i) Understanding potential risks and impacts associated with the management of any generated hazardous e-waste during its complete life cycle; ii) Ensuring that contractors handling, treating, and disposing of hazardous e-waste are reputable and legitimate enterprises, licensed by the relevant regulatory agencies and following good international industry practice for the e-waste being handled; iii) Ensuring compliance with applicable local and international regulations.

6. Hazardous E-Waste Storage

Hazardous e-waste should be properly stored to prevent or control accidental releases to air, soil, and water resources in areas where: i) E-waste is stored in a manner that prevents the commingling or contact between incompatible e-waste and allows for inspection between containers to monitor leaks or spills. Examples include sufficient space between incompatible or physical separation such as walls or containment curbs; ii) Store in closed containers (some could be radioactive proofed), away from direct sunlight, wind and rain; iii) Secondary containment systems should be constructed with materials appropriate for the e-waste being contained and adequate to prevent loss to the environment; iv) Provision of readily available information on compatibility to employees, including labelling each container to identify its contents; v) Limiting access to hazardous e-waste storage areas to only employees who have received proper training; vi) Clearly identifying (labelling) and demarcating the area, including documentation of its location on a facility map or site plan; and, vii) Conducting periodic inspections of e-waste storage areas and documenting the findings.

7. Transportation of E-Waste

All e-waste containers designated for off-site shipment should be secured and labelled with the contents and associated hazards. This must be properly loaded and secured into transportation vehicles before leaving the site, and must be accompanied by a shipping paper (i.e., manifest, record, etc.) that describes the load and its associated hazards, and which is consistent with the Transport of Hazardous Materials good practices and guidance.

8. Treatment and Disposal

In addition to the recommendations for treatment and disposal applicable to general waste, the following issues specific to hazardous e-wastes should be considered: i) Commercial or Government E-waste Contractors in the absence of qualified commercial or government-owned e-waste vendors (taking into consideration the proximity and transportation requirements), facilities generating e-waste should consider using: · Have the technical capability to manage the e-waste in a manner that reduces immediate and future impact to the environment, and have all required permits, certifications, and approvals, of applicable government authorities. Have been secured through the use of formal procurement agreements In the absence of qualified commercial or government-owned e-waste disposal operators (taking into consideration proximity and transportation requirements), project sponsors should consider using: i) Installing on-site e-waste treatment or recycling processes, ii) As a final option, constructing facilities that will provide for the environmental sound long-term storage of e-waste on-site or at an appropriate alternative location up until external commercial options become available.

9. Small Quantities of Hazardous E-waste

Hazardous e-waste materials are frequently generated in small quantities by many projects through a variety of activities such as equipment and building maintenance activities. Examples of these types of e-wastes include used batteries (such as nickel-cadmium or lead-acid); and lighting equipment, such as lamps or lamp ballasts, servers, computers, cables, etc. These types of e-waste should be managed, following the guidance provided in the above sections.

10. Special considerations for Monitoring Activities

Monitoring activities associated with the management of hazardous and non-hazardous e-waste should include: i) Regular visual inspection of all e-waste storage collection and storage areas for evidence of accidental releases and to verify that e-waste is properly labelled, and stored; ii) Inspection of loss or identification of cracks, corrosion, or damage to protective equipment, or floors; iii) Verification of locks, and other safety devices for easy operation (lubricating if required and employing the practice of keeping locks and safety equipment in standby position when the area is not occupied); iv) Checking the operability of emergency systems; v) Documenting results of testing for integrity, emissions, or monitoring stations; vi) Documenting any changes to the storage facility, and any significant changes in the quantity of materials in storage, vii) Regular audits of e-waste segregation and collection practices, viii) Tracking of e-waste generation trends by type and amount of e-waste generated, preferably by facility departments, ix) Characterizing e-waste at the beginning of generation of a new e-waste stream, and periodically documenting the characteristics and proper management of the e-waste, especially hazardous e-wastes; x) Keeping manifests or other records that document the amount of e-waste generated and its destination; xi) Periodic auditing of third party treatment, and disposal services including re-use and recycling facilities when significant quantities of hazardous e-wastes are managed by third parties. Whenever possible, audits should include site visits to the treatment storage and disposal location. In the event that e-waste (on-site storage and/or pre-treatment and disposal) is in direct contact with soil, additional procedures must be performed to ensure regular monitoring of soil quality.

Monitoring records for hazardous e-waste collected, stored, or shipped should include: i) Name and identification number of the material(s) composing the hazardous e-waste o Physical state; ii) Quantity (i.e., kilograms, number of containers); ii) E-waste shipment tracking documentation to include, quantity and type, date dispatched, date transported and date received, a record of the originator, the receiver and the transporter; iii) Method and date of storing, repacking, treating, or disposing at the facility, cross-referenced to specific manifest document numbers applicable to the hazardous e-waste o Location of each hazardous e-waste within the facility, and the quantity at each location.

References:

- Environmental Waste Management, Environmental, Health, and Safety (EHS) Guidelines General EHS Guidelines. International Finance Corporation, World Bank Group (IFC-WBG), 2007

- National Waste Management Strategy for Grenada. Dillon Consulting, 2003

- South Africa E-Waste Industry Management Plan V-1. Waste Policy and Information Management, Department of Environmental Affairs, 2014

- Procedimiento para la Gestión de Residuos Eléctricos No Peligrosos y Peligrosos (PCB). Proyecto De Rehabilitación de Redes para Distribución de Electricidad. Corporación Dominicana de Empresas Eléctricas Estatales (CDEEE), 2014

Annex 4: ESMF Publication and Consultation report

The importance of Stakeholder engagement and input at all stages of the project cannot be overstated, as it harmonizes involvement for all stakeholders during the entire project life cycle.

At this early stage of the project, a series of high-level technical engagements to discuss the objective of the project have been held with key representatives of all the ministries, including the Secretaries-General of these ministries. During this exchange, the status of ongoing e-government initiatives was expounded upon as well as some of the challenges involved.

It is expected that ongoing engagements with stakeholders and beneficiaries will continue and this will help to keep the project aligned with expectations. The Covid Pandemic, however, has presented unique challenges to this process and while technology provides a means to connect with stakeholders and beneficiaries, it is evident that this modality has its limitations.

Activity Log.

Date	Activity
August 2019	Meetings were held with other semi-government agencies who provide services on behalf of government or may be dependent on government services as well.
October 2019	A Workshop/Masterclass was also held involving a cross-sector of government and semi-government agencies.
February 2020	During the World Bank Mission, A sensitization meeting was held with SG's from all ministries during which the project objectives were conveyed.
February 2020	During the World Bank Mission, a meeting was convened with both Telecommunications providers on Island. The objective was to determine the status of plans and/or activities toward the establishment of a Government WAN
Jun 17 2020	DigiGov project page live. ESF documents published on NRPB website, PSC Facebook page and GoSXM facebook page.
June 19 2020	Stakeholder Consultation planning commenced
June 23 2020	Stakeholder planning meeting convened
June 24 2020	Press release published on the single print news paper(Daily Herald) and on a number of online media platforms.
June 26 2020	Direct email solicitation for ESF feedback

Stakeholders:

> Government Ministries and Departments
> Users of e-Services
> Civil Society and NGO's and Disadvantaged or Vulnerable groups
> Education institutions and Centers for learning
> Telecommunications Service Providers
> Regulatory Bodies

As per the project requirements, the ESF documents were published on the NRPB website on June 17th. The project press release which included a call for feedback was sent to 62 print and online news media on June 24th (annex 1). The publication of the ESF documents on the NRPB website, on social media platforms, and online news platforms and print media included a link to an online feedback form to allow respondents to provide input into the finalization of the ESF documents.

It was envisioned that consultation(s) would be convened to solicit feedback on the ESF documents, however it was determined by Government representatives that given the limitations imposed by the

Covid Pandemic and the resultant social unrest coupled with the limitations of time, made this option unrealistic and as such the project would have to rely on feedback from respondents for this milestone. To that end, the project sought to establish as large a footprint as possible for public outreach using the media platforms mentioned.

Efforts were made to encourage and increase feedback including a direct email campaign targeting specific stakeholders and telephone calls to potential respondents by government officials. These efforts also included a request to the Bank for an extension of the deadline for submission of the ESF documents by two weeks. The bank agreed to an extension of one week.

Links to online forms and project website

Project Web Page	https://nrpbsxm.org/digitalgov/
ESF Feedback Form	https://form.jotform.com/201737707956869
User Survey	https://form.jotform.com/201737282492054
Govt. feedback	https://form.jotform.com/201737928402052
Stakeholder Feedback	https://form.jotform.com/201738222757053

The last three links in the above matrix will be utilized soon to engage specific stakeholders and beneficiaries and will be leveraged as part of a wider Stakeholder Engagement Plan to maintain engagement with Stakeholders and Beneficiaries.

The platform used for online forms was a paid version of Jotforms. Analytics from the online forms showed that there were several visits to the sites but that not all visitors completed the feedback forms.

Form analytics – Visitations by location.

Countries	Views	% of visits
Sint Maarten	17	36.1%
Saint Lucia	17	36.1%
United States	6	12.7%
Jamaica	4	8.51%
Netherlands	1	2.12%
CW	1	2.12%
XX	1	2.12%

The shaded countries represent test visits by the project coordinator who developed the online forms.

In total, three feedback forms were submitted. It is likely that with additional time more feedback could have been obtained. The responses in the forms received provided good feedback but did not provide such feedback that would warrant a significant edit to the current version of the ESF documents.

NRPB
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News Release June 24, 2020

For Immediate Release

Digital Government Transformation Project calls on stakeholders' feedback

PHILIPSBURG - In the second half of 2020, the Government of Sint Maarten, assisted by the World Bank, will embark on the US$15 Million Digital Government Transformation Project. This project aims to improve selected public services for citizens and businesses. In addition, the project will increase the reliability and resilience of Government's information systems. More information about the project can be found at https://nrpbsxm.org/digitalgov.

Call for stakeholders' and public's feedback

An important requirement of this project is that it does not cause any negative environmental or social impacts. To address this, an Environmental and Social Assessment of the Project has been carried out in compliance with the World Bank Environmental and Social Framework (ESF) requirements. The measures which will be applied to address any potential environmental or social risks are published on the project website. **The public is encouraged to visit** https://nrpbsxm.org/digitalgov **to review the project details and provide feedback using the online forms available on the site.** You may also email your comments to dtpinfo@nrpbsxm.org.

Consultation plan

Given the importance of close consultation and to ensure proper and effective consultation**, the Digital Government Transformation Project is calling on all stakeholders and beneficiaries to review the three ESF documents**; namely the Environmental and Social management Framework, the Environmental and Social Commitment Plan and the Stakeholder Engagement Plan. These draft documents require input from stakeholders and beneficiaries for finalization. Please go to https://nrpbsxm.org/digitalgov and scroll to the ESF section to review the following ESF documents:

1. Environment and Social Management Framework
2. Environment and Social Commitment Plan
3. Stakeholder Engagement Plan

The Digital Government Transformation Project is financed by the Sint Maarten Trust Fund. The Trust Fund is financed by the Government of The Netherlands, managed by The World Bank, and implemented in collaboration with the Government of Sint Maarten by the National Recovery Program Bureau (NRPB).

Group, Headquarters Twelfth Air Force (Air Forces Southern), Davis Monthan Air Force Base (AFB), Arizona, Colo-

storm penetrations, enabling the most up-to-date information was provided on category five Hurricane Dorian.

and crews deploy to the USFOL on a temporary basis to conduct counter-drug operations.

NRPB calls for feedback

PHILIPSBURG--The St. Maarten government will start its Digital Government Transformation Project later this year. The National Recovery Program Bureau (NRPB) is calling for persons to review the project and submit feedback via e-mail or the online forms on NRPB's website.

The Digital Government Transformation Project is financed by the St. Maarten Trust Fund and is expected to have an estimated budget of US $15 million. The project is being prepared by the Ministry of General Affairs and the NRPB, and the grant agreement is expected to be signed later this year.

It aims to enhance access, efficiency, and resilience of selected administrative public services for citizens and businesses. Additionally, the project will increase the reliability and resilience of government's information systems, said the NRPB. Persons can find more information about the project at https://nrpbsxm.org/digital-gov.

"An important requirement of this project is that it does not cause any negative environmental or social impacts. To address this, an Environmental and Social Assessment of the project has been carried out in compliance with the World Bank environmental and social framework (ESF) requirements. The measures which will be applied to address any potential environmental or social risks are published on the project website.

"... Given the importance of close consultation and to ensure proper and effective consultation, the Digital Government Transformation Project is calling on all stakeholders and beneficiaries to review the three ESF documents, namely, the Environmental and Social management Framework, the Environmental and Social Commitment Plan and the Stakeholder Engagement Plan. These draft documents require input from stakeholders and beneficiaries for finalisation," said NRPB.

Persons can submit feedback via the online forms on NRPB's website. Persons can also e-mail comments to dtpinfo@nrpbsxm.org.

Annex 5: NRPB Code of Conduct

NRPB
NATIONAL RECOVERY
PROGRAM BUREAU

NRPB Code of Conduct
Environmental Social Health and Safety Management

The NRPB acknowledges that the overall wellbeing of Sint Maarten's population, the sound management of the man-made environment, the responsible use of our natural resources and the protection of our cultural heritage are key factors in the development of a more resilient and sustainable Sint Maarten. Social and environmental safeguards are, as such, a cornerstone of all our activities including, but not limited to, office management and the preparation, coordination, execution and evaluation of the recovery projects financed by the Sint Maarten Recovery, Reconstruction and Resilience Trust Fund.

The NRPB therefore strives to:

- Provide for, manage and maintain a safe working environment;
- Establish, implement and review internal and external environmental policies;
- Maintain sound environmental practices as an integral component of our daily activities;
- Minimize negative social and environmental impacts of all aspects of our operations;
- Minimize the generation of solid waste, prevent pollution and conserve natural and cultural resources;
- Conduct all our activities in compliance with applicable best practices, policies, local and international legal requirements;
- Apply applicable health and safety requirements as an essential component of all our programs and projects;
- Continuously improve our Occupational Health and Safety performance;
- Maintain respectful and productive interactions with members of the general public and other stakeholders;
- Respect, promote and protect applicable human rights;
- Promote gender equality and empowerment of women;
- Be intolerant of discrimination against any worker, consultant, individual or community (for example on the basis of family status, ethnicity, race, gender, sexuality, religion, language, marital status, birth, age, disability, or political conviction);
- Be intolerant of Gender Based Violence (GBV), inhumane treatment, sexual activity with children*, sexual harassment, use of illegal drugs and other illegal activities;
- Ensure that employees and contractors are qualified for the tasks they will be performing;
- 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, direct family, or personal connection);
- Actively engage with external consultants, contractors and other business relations to foster support for and adherence to the NRPB Environmental Social Health and Safety (ESHS) Policies and procedures, best practices, local and international legal requirements;
- Integrate ESHS requirements into procurement documents for works and supervision thereof;
- Encourage individuals to report violations of this Code as a duty;
- Ensure protection against retaliation for all who report violations of this Code, if that report is made in good faith.

✉ info@nrpbsxm.org   🌐 www.nrpbsxm.org   📞 +1 (721) 542-8887   📍 #57 Walter J.A. Nisbeth Road, Philipsburg, St. Maarten

The NRPB requires external- consultants, contractors and other business relations to:

- Protect the health, safety and welfare of all their staff, subcontractors and communities possibly affected by works and projects;
- Carry-out works in such a manner that minimizes negative impacts on communities, the environment, natural and cultural heritage;
- Commit to an NRPB approved Code of Conduct regarding Environmental, Social, Health and Safety (ESHS) matters;
- Appoint a person responsible for monitoring and reporting on matters related to ESHS;
- Submit to NRPB audits and reviews regarding ESHS and adherence to the approved Code of Conduct;
- Inform staff and consultants of, and allow access to, a Grievance Redress Mechanism without fear of reprisals.

(* for the purpose of the policy statement, the term "child" / "children" refers to any person(s) under the age of 18 years.)

Oct 2 2019

Claret Connor
Director
National Recovery Program Bureau