SINT MAARTEN

DIGITAL GOVERNMENT TRANSFORMATION PROJECT - P172611

Environmental and Social Management Framework

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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 Communication 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
DLT	Digital Leadership Team
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 (DGTP), ensuring implementation is in line with the 'do no harm' principle. The DGTP 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.

2. 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 DGTP 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.

3. 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 DGTP.
- **Section 3: Applicable GOSM Regulations and World Bank Environmental and Social Standards**
  This section describes the relevant policies of the 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 conditions 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.

4. Project Description

4.1. 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 legal, regulatory and institutional environment 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: institutional design and arrangements for managing digital Government transformation; design of a dashboard to track progress on digital reforms; design and implementation of a Government-wide Enterprise Architecture (EA) and associated outputs for cross-cutting platforms to enable digital service delivery; review development and implementation of policies, laws, and regulations to enable digital Government services and support the development of the digital economy, including cybersecurity, cybercrimes, ICT procurement, data protection and privacy, digital payments and digital identity; and support for the institutions 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: project management and technical advisory services to assist the National Recovery Program Bureau (NRPB) and the Digital Leadership Team (DLT) in the Ministry of General Affairs to manage project implementation and change management aspects of digital transformation; support for project coordination, institutional strengthening to respond to citizen feedback, monitoring and reporting, fiduciary and safeguards tasks, and the project audit; design and implementation of external communications and outreach programs; and design and implementation of a digital literacy program for civil servants.

Component 2: Building digital platforms to enable service delivery

This component will establish the technical foundations for citizen-oriented services to be delivered under Component 3 and increase resilience by reducing the vulnerability of selected services to cyberattacks and natural and disasters.

Sub-component 2.1: Cross-cutting digital service platforms.

This sub-component will finance: design and implementation of Digital Identity (Single Sign-On Platform) for public services with appropriate security features and credential choice for users and development of Standard Operating Procedures for identity recovery for adults and minors; integration of selected services in the online government portal with an Electronic Payment Platform that supports a range of payment options; design and implementation of an Interoperability Platform that links key registries[1]; and design and implementation of an Electronic Signatures Platform for G2G, C2G and B2G transactions.

Sub-component 2.2: System resilience and Records Management.

This sub-component will finance: upgrades to system resilience including procurement and implementation of cloud services; technical assessment of key registries (i.e. data governance, software, hardware, data formats, duplication, etc.); hardware, software, and business process reengineering that will ensure harmonization of registries across Government; and hardware solutions and additional human

[1] Key registries include: Civil Registry; CRIB (Tax ID); Social Registry (in development); Business Registry; Land Registry (cadaster); License Registry; and Address Registry

resource capacity to register and digitally archive Government documents.

Sub-component 2.3: Just-in-time digital services.

This sub-component will finance "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) in Philipsburg and Simpson Bay to include additional public services offered through multiple channels.

Sub-component 3.1: Modernization of one-stop shops. This sub-component will finance: assessment and implementation of recommendations to expand the scope and enhance customer orientation of the PSCs; software, hardware and office furniture; and development of procedures for continuity of operations.

Sub-component 3.2: User-centric e-services. This sub-component will finance: re-design, development, and deployment of e-services identified as a priority by stakeholders through an Online Government Portal;[2] design and implementation of an Online Government Portal, which will serve as a single point of entry for information and transactions related to all public services; kiosk machines for conducting services online; design and implementation of a multi-channel customer service feedback mechanism; and design and implementation of user-friendly mobile applications.

Component 4: Contingent Emergency Response Component.

This sub-component can be triggered following a natural disaster or emergency. Zero funds are allocated. Once the requirements for activation are 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. Details of how the CERC will operate, the list of negative activities that will not be financed, and the environmental and social screening criteria to be applied should the component be triggered during implementation will be included in the Project Operations Manual. The scope of the CERC will be clarified such that it is limited in time and budget and poses no risk to the achievement of the results of the project.

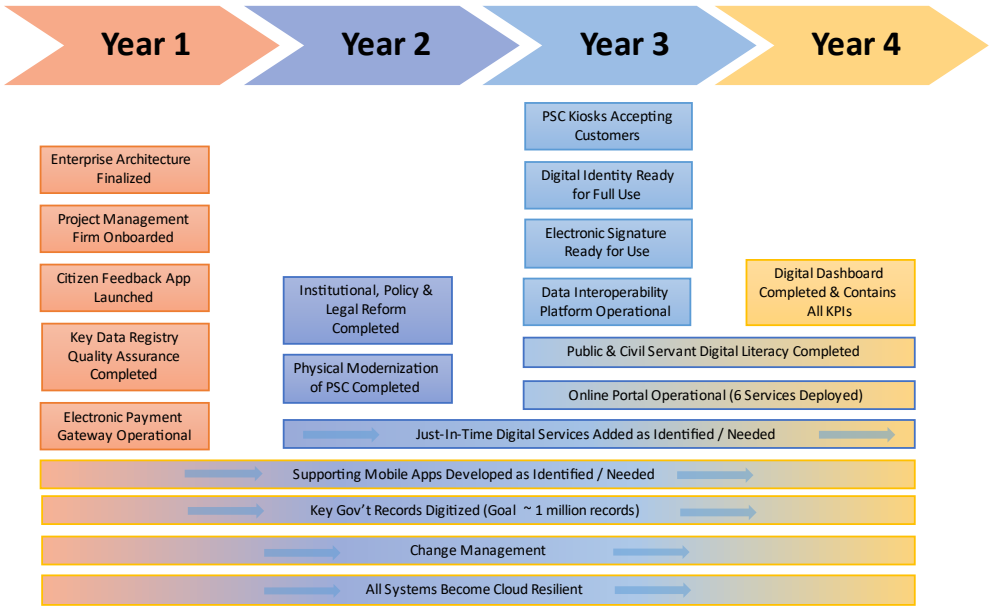
5. Cost of the Project and Implementation Schedule

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 within the first year and continue throughout the life of the project, as well as the legal and policy modifications needed to enable digital transformation across government. See figure 1 for the proposed implementation schedule.

[2] Priority services include: Certificate of Good Conduct (Public Service Center); Change of Address (Civil Registry); Registration of Death, Divorce or Marriage (Civil Registry); Building Permit Application (Department of Permits); Economic Licenses (Business, Director, Branch Licenses at Department of Economic Licenses); and Request for Vaccination Records (Collective Prevention Services).

Fig 1. Implementation Timeline



The project is expected to commence activities in the beginning of 2022, following the effectiveness of the legal agreement on January 20th, 2022, and end in May 2025.

6. Resources and materials

All goods and services procured under the project will be directly implemented by the National Recovery Program Bureau (NRPB). The Ministry of General Affaris (MGA) has established the Digital Leadership Team (DLT) to oversee the technical 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 guidelines following provisions included in Annex 2.

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

7.1. 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 DLT 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.

7.2. 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.

7.3. 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.[3] All firms to be procured under the project will be responsible for complying with the Labor Regulations.

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 work. The Ministry of Public Health, Social Development & Labor also endorses[4] 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. Hence, no persons under 18 years old will be employed for the DGTP.

The project requires technical staff with skills that require experience and education. The issues of migrant and seasonal workers, labour influx is applicable. In keeping with the Employment Act of Sint Maarten, no person under the age of eighteen years shall be employed.

The head or director of an enterprise has an obligation to report occupational injuries to the Department of Labor. 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.

7.4. National Human Immunodeficiency Viruses (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

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

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

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 DLT and NRPB staff and firms procured under the project.

8. Relevant Administrative Framework

8.1. National Recovery Program Bureau

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

8.2. Ministry of General Affairs

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

8.3. 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.

9. 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 Environmental and Social Standards (ESSs) that are designed to support Grantee' projects, with the aim of ending extreme poverty and promoting shared prosperity.

The ESSs 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 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 LMP which have been developed and are available on the project page of the NRPB website (https://nrpbsxm.org/digitalgov/).

- Consultants to the DLT in the MGA are Direct Workers because component 1 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, A specific e-waste management plan will be prepared should VROMI indicate that the volume of e-waste generated is significant as defined in the E-Waste Guidelines at Annex 2 of the ESMF.

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.

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

The World Bank ESS's requirements for the Project and actions taken by the MGA to comply with the ESS requirements are described in **Table 1**.

Table 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 Low. 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 appropriate information in accordance with ESS 10.	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 available https://nrpbsxm.org/digitalgov/ 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 Digital Leadership Team. The Digital Leadership Team 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 3.

ESS	Relevance	Requirements of ESS	Actions taken (or to be taken) to comply with ESS requirements
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 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 4. The LMP includes a grievance mechanism for employees.
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 2. While the project does not envisage any significant waste caused by the disposal of old hardware and IT systems, A specific e-waste management plan will be prepared should VROMI indicate that the volume of e-waste generated is significant as defined in the E-Waste Guidelines at Annex 2 of the ESMF.
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	Relevance	Requirements of ESS	Actions taken (or to be taken) to comply with ESS requirements
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 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 describes the different stakeholders of the project and how they will be engaged through the project The SEP has been disclosed on the NRPB website https://nrpbsxm.org/wp-content/uploads/2022/01/DGTP_SEP-v11.pdf Please see SEP consultations in the ESMF Annex 3.
		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 3.
		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	A Grievance Redress Mechanism is in place to receive concerns and grievances which arise from the project.

ESS	Relevance	Requirements of ESS	Actions taken (or to be taken) to comply with ESS requirements
		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.	The Grievance Redress Mechanism has been shared online as NRPB's GRM.

11. Baseline Environmental and Social Conditions

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.

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 2.

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: 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

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.

Biological Environment

The major part of Saint Maarten is covered with secondary vegetation derived from either seasonal formations or dry evergreen formations[5]. 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 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.

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.

12. Potential Risks and Impacts of the Project and their Management

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

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

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 has strengthened its capacity to manage the environmental and social policies and two additional E&S staff (one for environment and one for social) have been hired by the NRPB. The NRPB will also hire a Communications/E&S Specialist for the DLT 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 a Communications and E&S Specialist to assist DLT 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 DLT Communications Officer will ensure there is a translator given languages spoken on the island including English. SEP information will be translated in various languages to 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.

13. Project Institutional Arrangements and Capacity Building

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 MGA.

The MDA has established the DLT, that will be the primary technical counterpart for the project. The DLT will be led by a project manager and the team 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 DLT will be responsible for the technical and project management aspects of the project. The DLT will convene inter-ministry committees for specific cross-cutting activities that will be identified once the DLT is in place. The NRPB will work with the DLT 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 DLT 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 DLT 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. Fig 2. Shows an organogram of the project staffing.

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

Institutional Arrangements for ESMF Implementation

The NRPB has the overall oversight responsibility for the environmental and social safeguards. As such, The NRPB will provide oversight of ESF implementation of the project. The DLT will support monitoring of the ESF.The project manager of the DLT 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 DLT 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 3**.

Table 3: Roles and Responsibilities in Environmental and Social Management of the Project

Staff	Responsibilities
Project Manager & Assigned Staff of the Digital Leadership Team (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. • 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. • Support monitoring of the grievance mechanism for the project..
NRPB	• Overall oversight of ESF implementation of the project • Periodic monitoring of ESCP (every 6 months) • Support to the Digital Leadership Team 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.

14. 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.

15. Stakeholder Engagement and Information Disclosure

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.

Stakeholder Engagement

A SEP has been prepared and publicly disclosed. The Communications Officer, as well as the project manager of the DLT, 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 were publicly disclosed on the NRPB's website and consultations with some stakeholders were held. Details and issues discussed are summarized in the table below:

16. Stakeholder Consultation Process

Table 4: Consultation 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 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	DGTP 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 GRM for the overall project has been prepared and disclosed. The Project will adopt the GRM established by the NRPB. The GRM is used for all other projects

implemented by NRPB. In addition, the project will finance activities related to establishing a citizen feedback mechanism for the PSC. This work will be closely coordinated with the office of the Ombudsman, which receives complaints against government from citizens.

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. The NRPB's GRM is well established and provides a credible avenue for all Project beneficiaries and stakeholders to file their complaints during the Project's implementation. The NRPB has the overall responsibility for the GRM as the implementing agency for the project.

The DLT will support the NRPB in ensuring that complaints are responded to and followed up on by the most appropriate party. The contact details for filing complaints will be posted at the Public Service Centers in Phillipsburg and Simpson Bay, and are:

(I) NRPB's website

- Complaints Procedure – National Recovery Program Bureau (nrpbsxm.org)

(II) Telephone

- +1(721) 542-8886/7
- The complaint form will be provided for completion, in order to further process the complaint, or completed for the complainant during the phone call

(III) E-mail

- Download and complete the complaint form at the link below:

https://nrpbsxm.org/wp-content/uploads/2020/03/Complaints-Form.pdf

- E-mail the completed form to complaints@nrpbsxm.org with "Complaint [insert Project name] '' in the title of the e-mail. For example, "complaint Emergency Recovery Project I".

(IV) Social Media – messages on the NRPB's Facebook and LinkedIn Pages, respectively

- SXM National Recovery Program Bureau (facebook.com)
- https://www.linkedin.com/company/sxmnationalrecovery/mycompany/

(V) By visiting the office during office hours

- National Recovery Program Bureau
  #57 Walter A. Nisbeth Road
  Philipsburg
  Sint Maarten
- The complaint form will be provided for completion, for further processing of the complaint

The GRM is extended to handle labor related complaints. Details of the GRM for consultants are included in the LMP. The GRM will receive and respond to complaints prior to and during the project implementation.

The NRPB keeps a grievance log (see table 5).

Consultation Meetings on the ESMF and Feedback

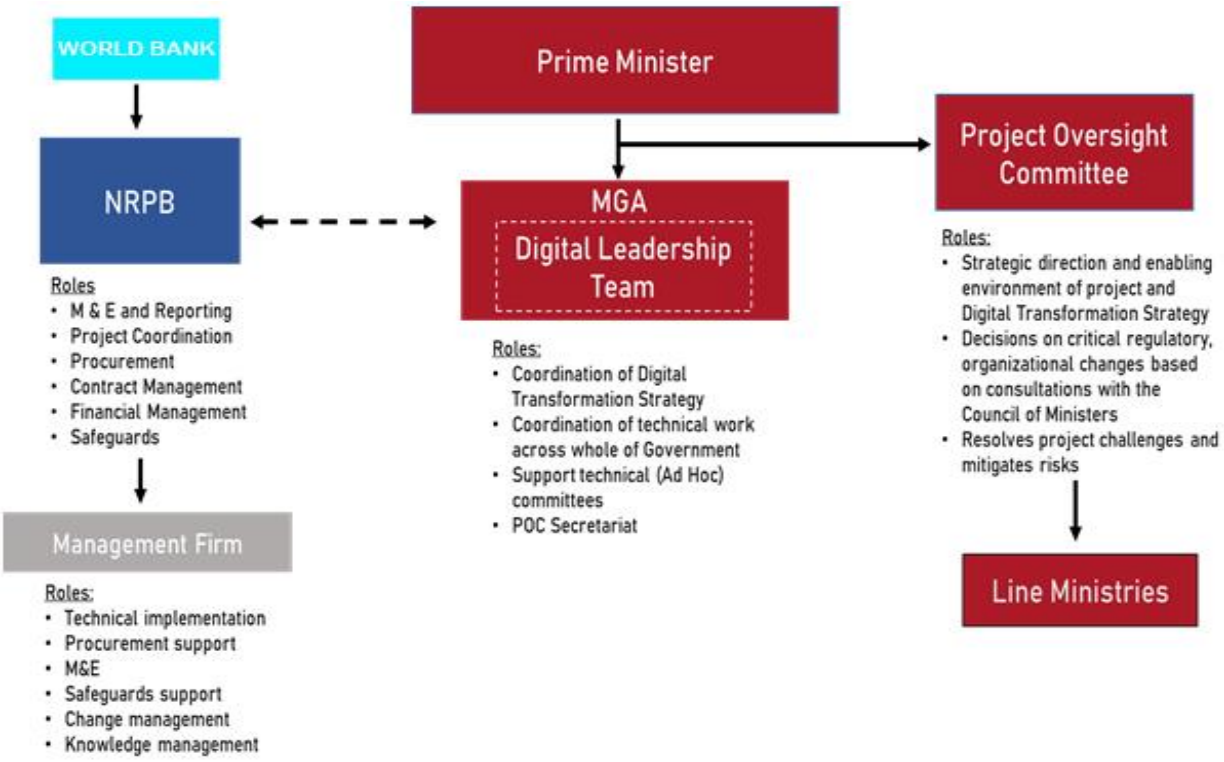
The project team has conducted focus group sessions regarding the design of the project. Inputs received are regularly recorded, and the proposed scope of work, risks and mitigation measures will be adjusted if necessary, and a revised ESMF will be publicly disclosed online. Any updated version will 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.

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).

Fig 2. Governance and Implementation Arrangements



Annexes

Annex 1: Call for Feedback

NRPB
NATIONAL RECOVERY PROGRAM BUREAU

News Release June 24, 2020

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 dgtpinfo@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).

Print Media Publication – Daily Herald – June 26, 2020

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.

Table 5: GRM Log kept by NRPB

GRM Nr.	Project	Complainant	Date of Submission	Case Handler	Status	Summary of redress	Date of closure	Comments

Annex 2: 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 3: 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.

ESMF 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 Jot forms. 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.

Annex 4: 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.

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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

Annex 5: CERC ESMF

Introduction

1. This CERC-ESMF is an Annex to the Environmental and Social Framework (ESMF) of the Digital Government Transformation Project. The ESMF and this Annex are intended to guide the environmental and social risk management of activities under the emergency response component which will be determined and then implemented in response to a national emergency[6].

2. Implementation of the activities listed in the positive list in the CERC Manual, will be urgently needed. The proposed works and other activities are small and medium scale works, or the provision of essential goods and services. The potential negative impacts are expected to be low to moderate, localized, and temporary, that can be mitigated through the implementation of the ESMF of the Project and this CERC-ESMF. Procurement of Goods and Services are of low E&S risk and will normally require no additional safeguards actions. For small civil works the standard mitigation measures, attached in Annex 5-5, shall apply. Those works with moderate risk will typically require that a Contractor's ESMP (C-ESMP) be developed (guidelines are given under Annex 5-6). Those works with substantial risk will require that a project specific ESMP, and possibly other E&S instruments, to be developed. The job specific ESMP and other E&S instruments described below in Table 2 will be prepared, consulted on, cleared by the Bank, prior to works beginning. High risk works will not be eligible for funding. The E&S screening tool (Annex 5-2) will be used for assessing and assigning the risk categorisation. This CERC-ESMF is complemented by the following Annexes:

Positive and Negative List of Activities	Annex 5-1
Screening Tool for E&S Risks	Annex 5-2
NRPB COVID-19 Provisions for Procurement and Contracting	Annex 5-3
Communication Guidance	Annex 5-4
Standard ESHS Mitigation Measures for Minor Works/Minor Repairs	Annex 5-5
General Guidelines for Moderate & Substantial Works C-ESMP	Annex 5-6

Environmental and Social Management Process

3. Upon activation of the CERC component, NRPB will carry out the following key steps:

Step 1: Application of the E&S Screening Form. As limited by the positive list and negative list (Annex 5-1), the NRPB, with support from Ministries where required, will propose and then screen the CERC activities for their environment and social risks and potential impacts, using the screening tool in Annex 5-2 (comprising of Tables B1 & B2) Given that the CERC objective is to support immediate priority activities (18 months), activities or subprojects which would induce resettlement, based on the results of the screening, will be ineligible for funding.

[6] See CERC-Manual for definition.

Step 2: Based on the results of the screening and the identification of E&S issues, a risk category will be determined for work activities – low, moderate, substantial or high - using the screening tool in Annex 5-2, The NRPB will prepare any required mitigation plans, describing the works/activities and mitigation measures to be conducted during detailed design, bidding/ contract, repair/restoration, and closure plans, taking into account the magnitude, scope, and nature of the emergency. The E&S instruments will also address waste management issues. Contractors will be required to ensure that all hazardous wastes are safely and appropriately managed during the implementation of the CERC, also in accordance with the e-waste guidelines annexed in the Project's ESMF as appropriate (Annex 2).

Step 3: WB clearance and Disclosure. Environmental and Social risk mitigation documents developed for low and moderate risk works or for the provision of essential goods and services, will not require WB clearance. E&S instruments developed for substantial or higher risk works, will require WB prior clearance. Table E2 below provides details about the expected E&S mitigation instruments of CERC activities. Disclosure of documents and public consultation of any required E&S instruments for works is required prior to the activity commencing.

Step 4: Preparation of Emergency Action Plan (EAP): The NRPB in coordination with the relevant implementing agencies will prepare the EAP including a list of emergency response procurement activities based on the results of the Rapid Needs Assessment.

Step 5: Implementation and M&E. The approved environmental and social documents will be implemented according to the agreed implementation arrangement in the Emergency Action Plan. The NRPB, unless otherwise agreed in the Emergency Action Plan, will be responsible for monitoring the environmental and social impacts of the activities.

Step 6: Completion and Evaluation. Once the CERC activities have been completed, NRPB, with the concurrence of the MoGA, will monitor and evaluate the results before closing the contract. Any pending issues and/or grievances must be first closed in accordance with the Project's grievance processes, before the activities are considered fully completed.

Potential E&S Risks and Impacts of Works

Potential Environmental and Social risks/impacts related to civil or other emergency works are summarized in Table E3 below.

Table E3 E&S risks and impacts of Works

Scope of Works	Potential Environmental and Social Impacts and Risks
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's disposal site.	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.
Mold and Asbestos Remediation may be needed in some of the buildings exposed to rainwater or containing asbestos	Debris and Waste Generation. Debris and other waste material will be generated from the demolition and cleanup activities as well as from the repair Buildings and other structures. Pollution, pest nuisance, fires, accidents, traffic disturbance are associated with improper management.
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.	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 demolition and construction works including use of scaffolding and work at heights. The work site may require workers to work closely together and share tools, which poses health risks related to communicable diseases, such as covid-19. Furthermore, the consequences of a natural disaster may lead to health considerations that need to be taken into account and possibly mitigated on site, e.g. increase of mosquito's.
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.	Community Health and Safety Risks. Staff working in buildings under repair are exposed to risks associated with construction activities. Mold remediation works may have an impact on infants and people with respiratory challenges who come in close contact with the mold affected material. Pedestrians are exposed to the risk of falling into the roadside excavations and trenches.
Repairing of Electrical Lines & Equipment. Repair or replacement of damaged electric lines and equipment, including re-erection of damaged poles and installation of street lights.	Asbestos. Asbestos has been classified as a known human carcinogen. Exposure to asbestos may occur through inhalation of fibers in air, released during construction works on buildings containing asbestos materials or when removing debris.
Temporary Relocation of Schools, Medical Facilities or other Public buildings. Normal operation of the building will be affected and alternative locations may be temporarily required for users.	Nuisance from the Construction Activities. Noise,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.

Scope of Works	Potential Environmental and Social Impacts and Risks
Repair of damaged infrastructure including, but not limited to: water supply systems, dams, reservoirs, canals, transportation systems, energy and power supply, telecommunication	Traffic Congestion. Excavations and trenches along the roads may affect the smooth traffic flow and may cause traffic jams. Construction related to vehicular movement and temporary storage of construction materials on the streets may affect the local traffic. Relocation of buildings users. School classrooms, medical services, etc. may need to partially or totally be temporarily relocated to facilitate repair/rehabilitation works. Labor Influx. Labor influx may have to be realized in an emergency situation. Labor influx may be associated with an increased presence of migrant workers in the host community. This may have an impact on the social fabric of the host community and can lead to social issues of different nature. Amongst the most impactful risks are the competition for resources, crime, use of substances, sexual exploitation and abuse.

List of Foreseeable E&S Instruments, Plans and Assessments

Procurement of Goods and Services are of low potential E&S risk and will normally require no additional safeguards actions other than what is already prepared for the DGTP Project. Works shall be classified as low-moderate-substantial, based on the E&S screening tool (Annex 5-2) and further apply the measures presented in Table E4 below. High risk works shall be excluded from funding.

Table E4 E&S measures for the different CERC activities

Activity	E&S Measures
Goods	e-waste management according to DGTP ESMF (Annex 2) if relevant
Services	Labor Management Procedures (LMP) of DGTP project is applicable
Low Risk/Minor Works	-Standard Mitigation Measures for minor works (Annex 5-5) - Job Safety Analysis -Covid-19 provisions for procurement and contracting (Annex 5-3) -LMP of DGTP project -Asbestos assessment -Mold assessment -Sign a Code of Conduct, combined with training on CoC
Moderate Risk Works	-Contractor's ESMP (see Annex 5-6 for guidelines); such as Community Health & Safety sub-Plan, Occupational Health & Safety sub-Plan, Waste Management sub-Plan, Mobilization sub-Plan. -Contractor shall engage a qualified ESHS manager - Job Safety Analysis -Covid-19 prevention (Annexes 5-3 & 5-4) -Sign a Code of Conduct, combined with training on CoC -LMP of DGTP project

Activity	E&S Measures
	- An abbreviated stakeholder engagement plan using the template provided below (Table E3) -Asbestos assessment -Mold assessment -Cultural heritage assessment if relevant will also require World Bank clearance -Hurricane and Fire Safety compliance with international standards -A Logistics plan for (temporary) relocation of the public buildings users if needed. - ESHS requirements will be included in the bidding documents -Contractors will submit monthly reports on ESHS compliance
Substantial Risk Works	-Same measures as above for Moderate Works -A standalone ESMP shall be prepared by NRPB, publicly disclosed and consulted and submitted to WB for no-objection. -A Stakeholder Engagement Plan shall be also prepared by NRPB, publicly disclosed and submitted to WB for no-objection

GRM

The NRPB has an existing GRM in place to fairly, efficiently and effectively handle concerns and grievances received from the CERC stakeholders. The GRM system is well established and provides a credible avenue for all CERC beneficiaries and stakeholders to file their complaints during the activities implementation. The GRM also handles complaints from project-workers regarding labor issues. Complaints received by the NRPB will be reviewed and forwarded to the DLT. For further details, please refer to Section 16 of this document.

Stakeholders Engagement

Stakeholder engagement is a continuous process to identify, communicate, and facilitate a two-way dialogue with the people affected by Project decisions and activities, as well as others with an interest in the implementation and outcomes of the project. For moderate or substantial risk works, NRPB will promote Stakeholder Engagement, by implementing the objectives and using the Template provided below. NRPB will keep records of the stakeholder activities, the outcome of consultation, key issues and how those were addressed.

The objectives of the stakeholder engagement are as follows:

- ✓ To identify the roles and responsibility of all stakeholders and beneficiaries and ensure their participation in the complete project cycle
- ✓ To benefit from the knowledge, experience, and skills of stakeholders and beneficiaries to enhance the design and implementation of the project
- ✓ To ensure that the appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.
- ✓ To devise a plan of action that clearly identifies the means and frequency of engagement of each stakeholder and beneficiaries

The following mediums will be employed in the delivery of the communication plan messages and the dissemination of project information. It will employ both traditional methods of communication and newer methods such as social media.

- Social Media Posting
- Print Media
- Press Conferences
- Annual Reports
- Launch Events
- Presentations
- Publications
- Press Releases
- Websites
- Internal Notices
- Video Recordings
- All Staff emails
- Ads
- PSAs
- Newsletters
- Facilitation Meetings
- Info-sessions
- Orientation
- Whatsapp Messaging
- Radio
- Television
- Blogs/Websites

The following Template will be used for identifying the stakeholders, categorizing by importance, proposing consultation means and frequency according to different project phases and specifying the responsibilities.

Table E5 Stakeholder engagement Template with example

Project Activity	**Stakeholder + contact info**	**Categorization**	**Potential Influence & Importance**	**Project Stage**	**Type of engagement required**	**Method & Frequency**	**Responsibility**
Repair of schools	Ministry of Education, Culture Youth and Sports (MECYS)	Interested/ Affected	High/ High	Preparation, implementation	Endorsement, active involvement in project	Bi-weekly meetings	Project Manager
	Current and future students attending the repaired schools	Interested/ Affected	Medium/ High	Preparation, implementation	Informing, cooperation	Public meeting before works commencement. Monthly social media posts during implementation	NRPB Social Safeguard
	Teachers						
	School Management Staff						
	Parents/Guardians Parents/Teachers Associations						
	Facility Owners						
	School Board						

	Nearby businesses						
	The Community Councils						
	Nearby homeowners and businesses which may experience inconvenience during the execution of the project						

Compliance with ESSs

The World Bank ESS's requirements for the CERC and actions to be taken to comply with the ESS requirements are described in Table E6 below.

Table E6 World Bank ESS's Requirements Actions Taken

ESS	Actions taken (or to be taken) to comply with ESS requirements
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts	Works will be screened using the E&S screening tool (Annex 5-2) and will be classified as low, moderate or substantial, based on the findings. Mitigation measures will apply accordingly as detailed in Table E4 above. Further E&S instruments may be required depending on activity specific risks.
ESS 2: Labor and Workers Condition	-Labor Management Procedures (LMP) have been developed and are available on the project page of the NRPB website (https://nrpbsxm.org/digitalgov/). A grievance mechanism for employees is included. -The Project will not employ any workers under the age of 18. -An Occupational Health & Safety Plan will be required for moderate and substantial risk civil works, as part of the C-ESMP.
ESS 3: Resource Efficiency and Pollution Prevention and Management	-A Waste Management Plan will be required for moderate and substantial risk civil works, as part of the C-ESMP. -Any e-waste that is produced as a result of the project will be collected and disposed of according to appropriate e-waste guidelines (Annex 2 of DGTP ESMF).
ESS 4: Community Health and Safety	-A Community Health & Safety Plan will be included in the C-ESMP for moderate and substantial risk works. -Covid-19 prevention measures will be adopted for worksites and stakeholder engagement consultations
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	The E&S screening process will identify if the proposed activity will cause resettlement and these impacts will be avoided by making such activites inelligable for includsion in the Emergency Action Plan.Note: ESS5 does not apply to persons internally displaced by natural disasters.
ESS 6: Biodiversity Conservation and Sustainable	Relevance will be assessed as part of the E&S screening. Negative impacts from civil works will be mitigated through a Waste Management and Pollution Prevention Plan. Activities that lead to environmental degradation are not eligible for funding.

ESS	Actions taken (or to be taken) to comply with ESS requirements
Management of Living Natural Resources	
ESS 7: Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities	Not relevant
ESS 8: Cultural Heritage	Relevance will be assessed as part of the E&S screening. A Cultural Assessment and Plan could be prepared depending on findings.
ESS 9: Financial Intermediaries	Relevance will be assessed as part of the E and S screening.
ESS 10: Stakeholder Engagement and Information Disclosure	-Stakeholders for activites and works will be identified early in the preparation stage and consulted upon. -NRPB's Grievance Redress Mechanism is available for stakeholders and other project affected parties.

Annex 5-1. Positive and Negative List of Activities

Table A1: Positive list of goods, services and works

Item
Goods
• Medical equipment and supplies • Non-perishable foods, bottled water and containers • Tents for advanced medical posts, temporary housing, and classroom/daycare substitution • Equipment and supplies for temporary housing/living (gas stoves, utensils, tents, beds, sleeping bags, mattresses, blankets, hammocks, mosquito nets, kit of personal and family hygiene, etc.) and school • Gasoline and diesel (for air, land and sea transport) and engine lubricants • Spare parts, equipment and supplies for engines, transport, construction vehicles. • Vehicles (Vans, trucks and SUVs) – (only eligible for import reimbursement) • Equipment, tools, materials and supplies for search and rescue (including light motor boats and engines for transport and rescue) • Tools and construction supplies (roofing, cement, iron, stone, blocks, etc.) • Equipment and supplies for communications and broadcasting (radios, antennas, batteries) • Water pumps and tanks for water storage • Equipment, materials and supplies for disinfection of drinking water and repair/rehabilitate of black water collection systems. • Equipment, tools and supplies for agricultural, forestry, and fisheries. • Feed and veterinary inputs (vaccines, vitamin tablets, etc.)
Services
• Consulting services related to emergency response including, but not limited to urgent studies necessary to determine the impact of the disaster and to serve as a baseline for the recovery and reconstruction process, and support to the implementation of emergency response activities. • Non-consultant services including, but not limited to: investigations and surveys, aerial photographs, satellite images, maps and other similar operations, information and awareness campaigns.
Works
• Repair of damaged infrastructure including, but not limited to: water supply systems, dams, reservoirs, canals, transportation systems, energy and power supply, telecommunication • Repair of damaged public buildings, including schools, hospitals and administrative buildings
Emergency Operating Costs
• Incremental expenses by the Government for a defined period related to early recovery efforts arising as a result of the impact of an emergency. This includes, but is not limited to: costs of staff attending emergency response, operational costs and rental of equipment

Table A2. Negative list under the CERC

1	Uses for goods and equipment financed by the CERC, which also applies to use and storage for DRM-related activities including hazard monitoring, disaster preparedness, and future response to natural disasters.
2	Activities of any type classifiable as High Risk per ESF (ESS 1)
3	Activities that would lead to conversion or degradation of critical forest areas, critical natural habitats, and clearing of forests or forest ecosystems, etc.
4	Activities affecting protected areas (or buffer zones thereof), other than to rehabilitate areas damaged by previous natural disasters or other phenomena
5	Land reclamation (i.e., drainage of wetlands or filling of water bodies to create land)
6	Land clearance and leveling in areas that are not affected by debris resulting from the eligible crisis or emergency
7	River training (i.e., realignment, contraction or deepening of an existing river channel, or excavation of a new river channel)
8	Activities that will result in the involuntary taking of land, relocation of households, loss of assets or access to assets that leads to loss of income sources or other means of livelihoods, and interference with households' use of land and livelihoods.
9	Construction of new roads, realignment of roads, or expansion of roads, or rehabilitation of roads that are currently located on communal lands but will be registered as government assets after rehabilitation.
10	Construction works, or the use of goods and equipment on lands abandoned due to social tension / conflict, or the ownership of the land is disputed or cannot be ascertained
11	Construction works, or the use of goods and equipment to demolish or remove assets, unless the ownership of the assets can be ascertained and the owners are consulted
12	Construction works, or the uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor
13	Construction works, or the uses of goods and equipment for military or paramilitary purposes.
14	Construction works, or the uses of goods and equipment in response to conflict, in any area with active military or armed group operations
15	Activities which, when being carried out, would affect, or involve the use of, water of rivers or of other bodies of water (or their tributaries) which flow through or are bordered by countries other than the Borrower/Recipient, in such a manner as to in any way adversely change the quality or quantity of water flowing to or bordering said countries.
16	Use of asbestos-based construction materials for reconstruction works

Annex 5-2: Environmental and Social Screening Tool

This tool will be completed by NRPB's Safeguards team. Based on the E&S screening which comprises Tables B1 & B2. NRPB will decide on the necessary instruments to be prepared. Instruments prepared for Substantial risk works will seek WB's no-objection. (refer to Section 3 Environmental and Social Management Process).

Note: ***Instructions to complete the checklist***
Start by providing a brief description of the project. Then using available information about the project answer each question in Column 2:

- Yes – if the answer is yes
- No – if the answer is no
- ? – if the answer is don't know

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?".

The potential likely significant effects of the project must be considered taking into account:

a) the magnitude and spatial extent of the impact (for example geographical area and size of the affected population likely to be affected);
b) the nature of the impact;
c) the magnitude, intensity and complexity of the impact;
d) the probability of the impact;
e) the expected onset, duration, frequency and reversibility of the impact;
f) the cumulation of the impact with the impact of other existing and/or approved projects;
g) the possibility of effectively mitigating the impact

Table B1- Environmental Screening Tool

Environmental 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?		
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 works require asbestos removal or extensive mold remediation actions?		
5. Will the proposed works produce solid wastes during construction or operation or decommissioning?		
6. Will the proposed works release pollutants or any hazardous, toxic or noxious substances to air?		

Environmental Screening Questions	Yes/No/? Briefly describe	Is this likely to result in a significant effect? Yes/No/? – Why?
7. Will the proposed works cause excessive noise and vibration or release of light or heat energy?		
8. 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?		
9. Will there be any risk of accidents during construction or operation of the Project which could affect human health or the environment?		
10. 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 area?		
11. Are there any areas on or around the location which are protected under international or national legislation for their ecological, landscape, cultural or other value, which could be affected by the project?		
12. 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?		
13. 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?		
14. Are there any inland, coastal, marine or underground waters on or around the location which could be affected by the project?		
15. Are there any areas or features of high landscape or scenic value on or around the location which could be affected by the project?		
16. 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?		
17. 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?		
18. Is the project in a location where it is likely to be highly visible to many people?		
19. Are there any areas, buildings, structures, or other features of historic or cultural importance on or around the location which could be affected by the project?		
20. Is the project located in a previously undeveloped area where there will be loss of greenfield land?		

Environmental Screening Questions	Yes/No/? Briefly describe	Is this likely to result in a significant effect? Yes/No/? – Why?
21. Are there existing land uses on or around the location e.g. homes, gardens, other private property, industry, commerce, recreation, public open space, community facilities, agriculture, forestry, tourism, mining or quarrying which could be affected by the project?		
22. Are there any plans for future land uses on or around the location which could be affected by the project?		
23. Are there any areas on or around the location which are densely populated or built-up, which could be affected by the project?		
24. 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?		
25. 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?		
26. 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?		
27. 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?		
28. Will pesticides, rodenticides or any other vector control products be used during any stage of project implementation and operation?		

Table B2- Social Screening Tool

Social Screening Questions Will the sub-project:	Yes	No	Is this likely to have a significant effect and why?
Labor Issues (ESS 2)			
1. Are there potential hazards to the workers?			
2. Will the proper PPEs be provided to the workers?			
3. Will the activity be able to put COVID-19 provisions in place?			
Community Health and Safety (ESS 4)			
4. Is there a chance that the work will cause labor influx to the area?			
5. Will the activity involve the hiring on security personnel?			
6. Will the activity be implemented with consideration to universal access?			
7. Is there a risk that the work will lead to gender disparity or gender-based violence?			
8. Is there a risk that safety concerns will increase due to introduction of the activity?			
9. Is there a vulnerable population affected (children, disabled, elderly, minority group etc.) who will need extra attention to either ensure any impacts are mitigated or be beneficiaries of the activity?			
10. Is there a possibility that there will be an increased exposure of the community to COVID-19?			
Resettlement Impacts (ESS 5)			
11. Do the works require temporary displacement of people from their current settlement/homes as a result of land acquisition or restrictions on land use as described under the scope of ESS5			
12. Do the works require permanent displacement of people from their current settlement/homes as a result of land acquisition or restrictions on land use as described under the scope of ESS5			
13. Will the work cause restrictions in people's access to the water, or other resources that they depend on in a park or a protected area as a result of land acquisition or restrictions on land use as described under the scope of ESS5?			
14. Will the works cause disruption to income generation for the communities as a result of land acquisition or restrictions on land use as described under the scope of ESS5?			
If the answer is yes to any questions under ESS5 the activity as designed is not suitable for funding under the CERC.			

15. Financial Intermediaries (ESS 9)			
16. Will the activity channel funds through a Financial Intermediary (FI) ?			
17. Does the FI have an environmental and social management system (ESMS) meeting the requirement of section A of ESS 9.			
18. Have the activities been assessed as to have minimal or no adverse E and S risk so that national law may apply to the FI activities as per para. 9 or ESS 9			
Stakeholder Engagement and Information Disclosure (ESS 10)			
19. Has there been any consultation meetings with the community members, or is there a clear plan to do this before works begin?			
20. Have there been any complaints or other known public concerns with this location, or this activity?			
Summarize process taken and outcomes of stakeholder meetings, documenting how concerns were or will be addressed:			

Environmental and Social Risk Category Determination

Based on the results of the screening and the identification of the significant E&S issues, a risk category will be determined for work activities as: low, moderate, substantial or high.

Low. Low risk/minor works usually include small scale repairs on buildings or infrastructure (roof leakage, broken windows, etc) aiming in making the building operational within a short time frame, usually in a couple of months. Relocation of tenants or building users is not required and there is no need for asbestos assessment and only small mold patches may be present. The standard mitigation measures for small works shall be efficient for managing any risks.

Moderate. Those works may include simultaneous repair of numerous homes or buildings or other infrastructure, located in different locations, that have sustained a more serious damage. Depending on building age, an asbestos assessment could be required to ensure safe removal of construction materials. Mold may be present, requiring professional remediation services. Tenants or building users may have to be temporarily relocated during works execution period. A contractor's ESMP shall be submitted.

Substantial. Activities with substantial environmental and social risks associated with major reconstruction or extensive repair works/new buildings/lots of houses/infrastructure, and where temporary or permanent relocation of users/tenants is required. Works are expected to be more complex, impact may affect the greater population and duration should be longer than Moderate works. Impact shall be reversible. Additional E&S instruments shall be required.

High. The activity is likely to generate a wide range of significant adverse social and environmental risks and impacts. This could be because of the complex nature of the Project, the scale (large to very large) or the sensitivity of the location. The probability of a major environmental or health & safety accident could be significant. Impact of the activity may not be reversible. High risk activities shall be excluded from funding.

Environmental and Social Screening summary.

Please summarize below the results of the E and S screening conducted above adding more rows if needed. Mitigation measures, including avoidance, need to be proposed which reference the mitigation measures for small works in Table E1, or indicate where new instruments will need to be prepared (such as a Waste Management Plan as part of site specific Environmental and Social Management Plan).

Relevant Standard	Main E and S Impacts and Risks	Required Mitigation Measures	What, if any, new instruments need to be prepared?	Person and Institution responsible

Annex 5-3: NRPB COVID-19 PROVISIONS FOR PROCUREMENT AND CONTRACTING

NRPB
NATIONAL RECOVERY PROGRAM BUREAU

NRPB ANNEX - COVID-19 PROVISIONS FOR PROCUREMENT AND CONTRACTING

The Employer is mindful of the current challenges that COVID-19 presents to the Contractor to execute the essential Works required for the safety of the populace of Sint Maarten. The Contractor is required to implement and enforce all the current COVID-19 safety and health legislation and directives of the government of Sint Maarten. Also, the Contractor is recommended to stay current and implement, as applicable, the international safety and health practices for COVID – 19 of the World Health Organization (WHO) – refer: https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public and of OSHA – refer https://www.osha.gov/Publications/OSHA3990.pdf.

Some specific good practices include:

- Conduct regular briefings and awareness sessions of the COVID-19 health and safety practices to be followed by all persons involved in the Works including:
  - Updates with regards to directives of the government of Sint Maarten
  - How to avoid the disease spreading (cough/sneeze in the crook of elbow)
  - Keep 1.5 meter or more away from other workers
  - Use and dispose of tissues for coughs and sneezes
  - Regularly wash hands with soap and water – many times per day
- Wash stations should be provided regularly throughout the sites of the Works, including close to toilets and communal facilities, with a supply of clean water, liquid soap and paper towels/electric hand dryers, with a waste bin (for used paper towels) that is regularly emptied. Alternatively, alcohol-based hand rub should be provided.
- Enhanced cleaning arrangements should be put in place to include: interiors of vehicles which may be used by several workers, staff, etc, waste bins at key places, regular and deep cleaning using disinfectant of communal areas, eating areas, latrines/toilets and, including tools, door handles, floors and all surfaces that are touched regularly.
- The provision of Personal Protective Equipment (e.g. masks and rubber gloves), as required.
- Workers showing COVID-19 symptoms or have recently been in close contact with persons testing positive, must immediately cease involvement in the Works and seek medical direction and assistance.
- Encourage workers to use the existing project grievance mechanism to report concerns relating to COVID-19, preparations being made by the Contractor addressing COVID-19 related issues, how procedures are implemented, and concerns about the health of their co-workers and other staff.

Bidders are to include, in the ESHS Management Strategies and Implementation Plans or C-ESMP, the measures proposed to be implemented for the duration of the Contract to prevent or minimize the possibilities of an outbreak of COVID-19 amongst management, staff, (sub-) contractors and neighboring communities

Annex 5-4: Communications Protocol During COVID -19

1. Under conditions of a COVID 19 out break a common approach to stakeholder engagement where large gathering of the public is encouraged, will need to change. There are numerous alternatives, but the key criteria for stakeholder engagement remains the same, and that is meaningful dialogue with project-affected people with attention given to the most vulnerable. Every alternative must still allow for feedback and suggestions to be provided by stakeholders and for those to be incorporated into the design of the activity where feasible. Some suggestions for community engagement during COVID-19 restrictions are listed below.

a. Avoid public gatherings (taking into account national restrictions), including public hearings, workshops and community meetings;

b. If smaller meetings are permitted, conduct consultations in small-group sessions of no more than 10 people, such as focus group meetings in an outside area with chairs placed 6 feet apart;

c. If inperson meetings are not permitted, make efforts to conduct meetings through online channels, including WebEx, zoom and skype;

d. Try social media and online channels to share activity information. Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose;

e. Employ traditional channels of communications (TV, newspaper, radio, mobile broadcasting by car through the neighborhoods, dedicated phone-lines, and mail) if a stakeholder does not have access to online channels or does not use them frequently; and

f. Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators, or direct calling by the project team.

Annex 5-5. Standard ESHS Mitigation Measures for Minor Works/Minor Repairs

ESHS Risks/Impact/ Activity	Description of the Risk/Impact	Mitigation Measures
Community exposure to construction risks		The Contractor shall: - Establish a perimeter of the site, marked by barrier tape and signage indicating that Construction is ongoing and disallowing unauthorized access. - Sign a 'code of conduct' with all its staff before mobilizing them into the project site. The code of conduct (see Annex 4 for guidance) will include the responsibilities of the workers in dealing with the community, (personal) waste management and workplace conduct. A training on the CoC will be provided to all workers.
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: - Identify the potential hazards at worksites associated with the construction activity - Appropriate measures and precautions will be taken to prevent danger and injury from construction activities.
Asbestos	Asbestos has been classified as a known human carcinogen. Exposure to asbestos may occur through inhalation of fibers in air, released during construction works on buildings containing asbestos materials.	If in the event a construction project requires the stabilization or removal of asbestos construction materials, the contractor shall contact the Inspectorate Public Health, Social Services and Labor of the Ministry of Public Health, Social Development and Labour and **The Inspection Department of** the Ministry of Public Housing, Spatial Planning, Environment and Infrastructure (VROMI)) and work towards developing an asbestos management plan with appropriate experts and authorities. Contractor shall provide all relevant protective gear to workers.
Occupational risks at work sites	Lack of awareness among workers on the ESHS risks and requirements of the activity	The NRPB, and if applicable its supervision consultant, shall provide ESHS awareness sessions and material 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 been briefed on and have received the ESHS awareness material provided by the Engineer.

ESHS Risks/Impact/ Activity	Description of the Risk/Impact	Mitigation Measures
Occupational risks at work sites	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 appropriate personal protection equipment (PPE) for workers, such as safety boots, helmets, masks, gloves, protective clothing, goggles, body harness, and/ or ear protection as needed based on the work requirements and will have First Aid Kits available to address immediate/minor needs.
Occupational risks at work sites	Hazards from falling debris and objects	- 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 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
Working at heights	Risk of fall from improper ladder and scaffold use	- 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

ESHS Risks/Impact/ Activity	Description of the Risk/Impact	Mitigation Measures
Working with the electrical lines and live electrical equipment	Risk of electrical shocks while working with the electrical lines, transformers and other electrical equipment	- 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 de-energized and visibly grounded, maintain proper distance from overhead electrical power lines (at least 3 m) and/or provide insulating barriers
Trenches and excavations	Risk of community individuals' fall in the trenches; and occupational risks	- Ensure that trenches excavated in public areas shall be adequately barrica ded and provided with signs to prevent risk of public falling in to them - 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
Workers facilities at the works/construction sites	Lack of safe drinking water and sanitation facilities create unhygienic conditions at worksites	The contractor shall: - Arrange safe drinking water to workers - Provide adequate sanitation facilities - Maintain clean worksites - Ensure workers do not eat, drink or smoke in the work areas affected by mold
Child and youth labor	Children under the age of 18 years are prohibited from working.	- The Contractor shall not hire any labor under 18 years of age. This will be stipulated in the bidding documents

ESHS Risks/Impact/ Activity	Description of the Risk/Impact	Mitigation Measures
Gender Based Violence (GBV) and Sexual Exploitation	Possible Gender Based Violence or Sexual Exploitation during works	- Contractor provide the Code of Conduct during the bidding or prior to contract signing which NRPB approves - Any incident or suspicion of an incident will be reported to NRPB by the contractor. - All relevant authorities shall be contacted if any such event occurs. Judicial authorities are contacted if there is a legal obligation to do so and if the alleged victim/ complainant wishes to report to the judicial authorities. Contractor will act upon guidance from the NRPB.
Working conditions	The project might generate workers concerns and grievances about working conditions.	Project workers shall have access firstly to the Contractor who will receive workers concerns and grievances and process them through the contractor's GRM which they will be required to established before project workers are in place. The Social Safeguards Specialist in NRPB will monitor if and how concerns are addressed by the contractor. If contractor does not address concerns, workers will be directed to the NRPB's Labor GRM mechanism and track the resolution of complaints and present them in a quarterly report. NRPB's GRM is always open to receive complaint, including from project workers.
Working conditions	If incidents are not investigated and root causes are not identified, there is a risk that they may repeat	- The NRPB Environmental and Social Safeguards Officers and their Supervision Consultant shall investigate all incidents related to workplace injuries and accidents; and, 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. - The contractor shall report any accident in the timeframe and format specified in the ESCP
Waste from works/ construction sites	Pollution from the improper management of solid wastes and excess materials from the construction sites.	- The Contractor shall properly collect all waste from the worksites and transport these wastes to the disposal sites approved by Government. - When discarding the damaged material affected by mold, the Contractor shall take appropriate measures to exterminate the mold according to standard industry practices.

ESHS Risks/Impact/ Activity	Description of the Risk/Impact	Mitigation Measures
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)	- The NRPB and the Contractor shall ensure the work area is unoccupied, and the nearby areas are free of infants and people with respiratory challenges. - 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 kept clean, dry, and free of visible debris.
Drainage and Wastewater from the construction sites	Drainage from the construction sites and material storage sites (sand and aggregates) may contain sediment load	The Contractor shall - Cover all stockpiles containing loose materials such as sand and aggregates with plastic covers to protect them from wind and rain - Not allow ponding of water near the construction sites. - Dispose of all waste water according to the Guidelines of the Government of St. Maarten
Noise pollution	Noise and vibrations from the construction activities and equipment may cause a nuisance to the nearby communities.	The Contractor shall: - 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. - Inform the community of planned activities which may cause noise nuisance in a timely manner.
Air pollution	Dust from construction activities and emissions from construction equipment and vehicles may cause air pollution	The Contractor shall: - Take appropriate measures 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.

ESHS Risks/Impact/ Activity	Description of the Risk/Impact	Mitigation Measures
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: - Not block the local streets/roads for traffic without first obtaining the required authorization from the Ministry of Public Housing, Spatial Planning, Environment and Infrastructure (Ministry of VROMI) and the Ministry of Justice; - In consultation with the Ministry of VROMI inform the General Public of any scheduled blocking of roads (Newspaper ads and PSAs). - Where relevant, place traffic signs and flagmen at required places to control the traffic as directed by the Ministry of VROMI - The contractor shall manage available parking spaces in a responsible manner, shall encourage or facilitate joint transportation for staff.
Community complaints	Negative impact on the 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 in accordance with the GRM of the NRPB. If the complaint contains elements of GBV, the complaint is immediately referred to and reported to NRPB (also see previous text on mitigation measures to workplace incidents).

Annex 5-6. General Guidelines for Moderate & Substantial Works C-ESMP

The contractor is responsible for developing the C-ESMP that will be reviewed and approved by the NRPB which will also supervise its implementation.

ESHS Mobilization Strategy & Construction Site Layout Plan

The Contractor will need to prepare a Mobilization plan that will help to better prepare for the works commencement, making sure appropriate measures/supplies are in place for a safe and effective commencement of works. Key information to include are:

- ✓ The lead time for finalizing the Contractor's Environmental and Social Management Plan (C-ESMP). The C-ESMP shall be updated considering the jobsite specific risks and mitigation measures and subsequently being approved by NPRB, before the commencement of works.
- ✓ Mobilization time for the ESHS experts, in case such experts are not stationed on Sint Maarten.
- ✓ Prepare an inventory of health and safety equipment and logistical arrangements for supply of such. This may include: mobile scaffolds equipped with guardrails; midrails, guardrails, planks and toe-boards for scaffolds completion; acoustic barriers; fencing panels; PPEs for workers; signage; harnesses/lanyards; waste funnels; waste skips and bins; portable toilets; washing stations; paper-roll stands; sanitizers; surgical masks; fire extinguishers; first-aid kits; drinking water containers; secondary spill containment equipment; oil/fuel absorption materials; silt fences; circular saws/grinders with safety guard.
- ✓ Acquisition plan for any permits/waivers required for the works.
- ✓ Details (location, size, map, etc) of any available materials storage yard that will facilitate works logistics, if applicable.

Contractor shall also prepare a Construction Site layout plan that involves identifying, sizing, and placing of temporary facilities within the boundaries of the construction site. The basic consideration in an effective site layout planning is the smooth flow of materials, labor, and equipment within the site, in addition to satisfying various work constraints and safety requirements. Additionally the plan shall include the location of parking spaces, sanitary facilities, scaffolds, lifelines anchoring points, washing stations, first-aid kit, PPEs storage, fire extinguishers, fences and security signage, gates.

- ESHS Survey & Layout

Before works commencement, Contractor shall conduct an Environmental and Social survey of the immediate area of project impact and prepare a layout identifying: Location of sensitive receptors (schools, medical facilities, worship places, etc); Land use (residential, commercial, etc); Monuments and other areas of archeological interest; Flood prone areas; Rain water trenches; Ponds or other water bodies; Roadside parking spaces; Trees obstructing the works; Parks, squares or other community public spaces; Low hanging cables.

OHS Workers Health, Safety & Labor Plan

Employers and supervisors are obliged to implement all reasonable precautions to protect the health and safety of workers. The application of prevention and control measures to occupational hazards shall be based on the site-specific Job/Hazard Analysis.

A Construction Hazard Assessment (CHA) is essential to identify hazards and risks and appropriate controls prior to mobilization to site. All hazards identified must be prioritized.

The completion of a Job Hazard Analysis (JHA) is required to verify that hazards and risks associated with a specific task are identified and appropriate controls are implemented prior to execution of the task. All hazards identified must be prioritized. The JHA must be communicated to all workers involved with the task prior to begin the task. Subcontractors will be responsible to develop their own JHAs or safe work procedure for any work in their scope that is hazardous and/or complex.

Ladders:

- ✓ All straight ladders shall be tied off.
- ✓ Ladders shall be placed so that they form an angle no greater than 30° from vertical.
- ✓ Ladders shall extend at least 1 meter above the level to be served.
- ✓ The Contractor shall inspect ladders for cracked, broken, or defective parts before use;
- ✓ Set up ladders on stable surfaces;
- ✓ Use non-conductive ladders (e.g., fiberglass) and exercise extreme caution when working near power lines.

Scaffolds:

- ✓ The scaffold must be structurally sound and sturdy.
- ✓ Scaffolds should be set up on completely solid footing.
- ✓ A competent person must supervise workers as scaffolds are erected, dismantled, moved, or altered in any way.
- ✓ All scaffolding must be equipped with toeboards, midrails, and guardrails.
- ✓ The scaffolding platforms should be tightly planked.
- ✓ The scaffold may be accessed by way of stairwells and ladders.
- ✓ The scaffolding must rest at least 10 feet away from electrical power lines during all times.
- ✓ Proper scaffolding shall be used for all activities that are 6 feet (or more) above ground level.

Personal Fall Protection:

A fall arrest system shall be used any time when working at an elevated level and exposed to a fall hazard.

- ✓ Use of fall prevention devices, including safety belt and lanyard travel limiting devices to prevent access to fall hazard area, or fall protection devices such as full body harnesses used in conjunction with shock absorbing lanyards or self retracting inertial fall arrest devices attached to fixed anchor point or horizontal life-lines.
- ✓ When vertical lifelines are used, each employee must be attached to a separate lifeline.
- ✓ Anchorages, lanyards and vertical lifelines must have a minimum breaking strength of 5,000 pounds
- ✓ Personal fall arrest systems are rigged in such a manner that the employee cannot free fall more than 6 feet (1.8 m) or contact a lower level.
- ✓ A competent person or qualified person must inspect each knot in a lanyard or vertical lifeline to ensure that it meets the requirements, before any employee uses the lanyard or lifeline.
- ✓ Provide appropriate training in use, serviceability, and integrity of the necessary PPE.

Standard Personal Protection Equipment:

Providing appropriate personal protective equipment (PPE) in conjunction with training, use, and maintenance of the PPE, such as safety boots, helmets, masks, gloves, protective clothing, goggles, body harness, and/ or ear protection as needed based on the work requirements. The Contractor shall have First Aid Kits available to address immediate/minor needs.

The use of hearing protection should be enforced actively when the equivalent sound level over 8 hours reaches 85 dB(A), the peak sound levels reach 140 dB(C), or the average maximum sound level reaches 110dB(A). Hearing protective devices provided should be capable of reducing sound levels at the ear to at least 85 dB(A).

Use of machine guards or splash shields and/or face and eye protection devices, such as safety glasses with side shields, goggles, and/or a full face shield.

Provision of proper eye protection such as welder goggles and/or a full-face eye shield for all personnel involved in, or assisting, welding operations.

Standard PPEs:

- ✓ Hard hat;
- ✓ Safety Glasses;
- ✓ High visibility vests;
- ✓ Safety footwear
- ✓ Gloves (applicable to task);
- ✓ Hearing protection (applicable to task);
- ✓ Respiratory protection (applicable to task)

Housekeeping:

- ✓ Housekeeping is a basic requirement on all construction sites and must be maintained at all times. Special attention must be given to maintaining clear walkways and roadways. Removal of trash, slipping and tripping hazards, and proper storage of materials is an ongoing requirement.
- ✓ Trash containers and/or garbage cans must be available in the various work areas.
- ✓ Removal of protruding nails staples, screws or other objects that present a hazard to personnel or equipment. Hoses, cables and cords where practicable should be suspended from overhead or effectively covered when on the ground. Excess hose, cord, cable found on the ground shall be removed from the work area. Any cylindrical waste (i.e. welding rods, conduit, pipe, coil rod) shall be removed from the floor, ground and gratings.
- ✓ Scaffold decks must be kept clear of debris.
- ✓ All materials must be properly stacked and secured to prevent sliding, falling or collapse.

Fire/Electricity protection

- ✓ Storing flammables away from ignition sources and oxidizing materials.
- ✓ Provide necessary fire prevention equipment on site in line with applicable regulations. (i.e. Fire extinguishers and training).
- ✓ Checking all electrical cords, cables, and hand power tools for frayed or exposed cords.
- ✓ Double insulating / grounding all electrical equipment used in environments that are, or may become, wet; using equipment with ground fault interrupter (GFI) protected circuits. Do not plug multiple extension cords into each other. Avoid overhanging power cords or untidy floor laying.

Vehicles Safety

- ✓ Training and licensing vehicle operators in the safe operation of specialized vehicles such as forklifts, including safe loading/unloading, load limits.
- ✓ Ensuring drivers undergo medical surveillance.
- ✓ Ensuring moving equipment with restricted rear visibility is outfitted with audible back-up alarms.
- ✓ Establishing rights-of-way, site speed limits, vehicle inspection requirements, operating rules and procedures (e.g. prohibiting operation of forklifts with forks in down position), and control of traffic patterns or direction.
- ✓ Restricting the circulation of delivery and private vehicles to defined routes and areas, giving preference to 'one-way' circulation, where appropriate.

Signage

Every site shall be equipped with signage that informs all workers and visitors of the regulations, hazards and site or job specific safety equipment required. Any unsafe area should be identified with a barricade and hazard signage. Warning for unauthorized access shall be visible at the entrance. Contractor will need to specify type, dimensions and number of signs used per site.

Sanitation and Water Supplies

- ✓ Adequate lavatory facilities (toilets and washing areas) should be provided for the number of people expected to work in the facility.
- ✓ Adequate supplies of potable drinking water should be provided.

Good practices

- ✓ Minimizing possible hazards through design of safe work systems and administrative or institutional control measures. Examples include job rotation, training safe work procedures, workplace monitoring, limiting exposure or work duration, etc.
- ✓ Passageways for pedestrians and vehicles within and outside buildings should be segregated and provide for easy, safe, and appropriate access.
- ✓ Hand, knee and foot railings should be installed on stairs, fixed ladders, platforms, permanent and interim floor openings, loading bays, ramps, etc.
- ✓ Use toeboards and screens for falling objects protection.
- ✓ When working on hot weather, take frequent brakes under shade, keep hydrated, schedule outdoor works during the cooler hours of the day.

Emergency numbers list

Place at visible locations around the construction site a list of emergency contact details. The list shall include contact details of the ESHS Manager, Site Supervisor, Foreman, Fire department, Police, Hospital, GEBE and other utilities.

OHS Training

Provisions should be made to provide OHS orientation training to all new employees to ensure they are apprised of the basic site rules of work at / on the site and of personal protection and preventing injury to fellow employees.

Training should consist of basic hazard awareness, site specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Any site-specific hazard or color coding in use should be thoroughly reviewed as part of orientation training

The employer should ensure that workers and contractors, prior to commencement of new assignments, have received adequate training and information enabling them to understand work hazards and to protect their health from hazardous ambient factors that may be present.

The training should adequately cover:

o Knowledge of materials, equipment, and tools
o Known hazards in the operations and how they are controlled
o Potential risks to health
o Precautions to prevent exposure
o Hygiene requirements
o Wearing and use of protective equipment and clothing
o Appropriate response to operation extremes, incidents and accidents

Grievance Redress Mechanism for Workers (GRM)

NRPB's (Sub-)Contractors are obliged to comply with national (labor) legislation and applicable World Bank standards. Furthermore, the NRPB requires its staff and consultants and (Sub-)Contractors to adhere to the NRPB ESHS Code of Conduct. The Code of Conduct prescribes that external partners (NRPB's (Sub-)Contractors) must allow access to a grievance redress mechanism without fear of reprisals.

Contractors are thus required to submit a workers' Grievance Redress Mechanism for NRPB's approval, as part of the C-ESMP, for operation during implementation of the works. The Contractor's GRM will describe in detail the following processes:

1. Uptake (channels available for submitting complaints, this should be sent to at least two ESHS personnel members, to ensure the complaint is received and addressed)
2. Investigation and
3. Resolution and/or
4. Referral of complaints to the NRPB's Program-level GRM

For further details on GRM, please refer to Section 16 of this document.

Labor Conditions

Contractor shall abide to the Labour Legislation of St Maarten, which covers a broad range of issues to regulate the labor relationship between employees and employers. It describes provisions concerning the work-times, periods of rest, overtime, nightshift, standby shift, holidays, safety, the prohibition of child labor, the prohibition of night work and dangerous work for youths. The current labour legislation covers the issues of minimum wages, employee dismissal, prohibition of child labor, occupational injury, holidays and special leaves etc;

Employment Records of Workers. The Contractor shall keep complete and accurate records of the employment of labor at the Site. The records shall include the names, ages, sex, hours worked, and wages

paid to all workers. Confirmation of legal residency, medical insurance and pension contributions of all (sub-)Contractors workers should be provided. These records shall be summarized on a monthly basis and submitted to the project Manager.

Community ESHS Plan (including Traffic Management, Noise Prevention, Dust minimization, Complaint management procedure for community complaints)

Traffic

Traffic safety should be promoted by all project personnel during displacement to and from the workplace, and during operation of project equipment on private or public roads. Measures should include:

√ Emphasizing safety aspects among drivers; √ Improving driving skills and requiring licensing of drivers; √ Adopting limits for trip duration and arranging driver rosters to avoid overtiredness; √ Avoiding dangerous routes and times of day to reduce the risk of accidents; √ Use of speed control devices (governors) on trucks, and remote monitoring of driver actions; √ Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure; √ Minimizing pedestrian interaction with construction vehicles; √ Collaboration with local communities and responsible authorities to improve signage, visibility and overall safety of roads, particularly along stretches located near schools or other locations where children may be present; √ Employing safe traffic control measures, including road signs and flag persons to warn of dangerous conditions.

Contractor should prepare a drawing with site access routes, entry gates and storage area.

In case of road or pedestrian walkway blockage or closure, Contractor shall inform VROMI about work activities and duration, along with measures for managing traffic and pedestrian safety/mobility. Contractor shall prepare a drawing of the area and indicate traffic signs, lights, flag persons and other appropriate safety mitigation measures. A notice shall be placed in advanced of the works for informing community about the upcoming disturbance.

- ✓ Necessary risk mitigation measures shall be taken to prevent public from entering to the construction area by fencing the site and using proper no-entry signage.
- ✓ Parking obstruction of residents shall be considered and mitigated when drafting the traffic plan.

Noise

During construction and decommissioning activities, noise and vibration may be caused by the operation of pile drivers, earth moving and excavation equipment, concrete mixers, cranes and the transportation of equipment, materials and people. Some recommended noise reduction and control strategies applicable in areas close to community areas include:

√ Planning activities in consultation with local communities so that activities with the greatest potential to generate noise are planned during periods of the day that will result in least disturbance; √ Using noise control devices, such as temporary noise barriers and deflectors for impact and blasting activities, and exhaust muffling devices for combustion engines; √ Avoiding or minimizing project transportation through community areas; √ Comingle loads for minimizing load/drop-off movements; √ Limiting the hours of operation for specific pieces of equipment or operations, especially mobile sources operating through community areas; √ Re-locating noise sources to less sensitive areas to take advantage of distance and shielding; √ Developing a mechanism to record and respond to complaints.

Dust

√ Minimizing dust from material handling sources, such as conveyors and bins, by using covers and/or control equipment (e.g. water suppression); √ Minimizing dust from open area sources, including storage piles, by using control measures such as installing enclosures and covers, and increasing the moisture content; √ Dust suppression techniques should be implemented, such as applying water or non-toxic chemicals to minimize dust from vehicle movements; √ Truck loads of loose materials should be covered; √ Truck speed should regulated and truck routes should avoid residential areas.

Community Notification

Contractor shall prepare a Notification Letter to inform residents of the adjacent community about works duration and expected disturbance. Door to door handing out is advisable.

The Contractor will include in the C-ESMP the radius in which Notifications will be delivered and summarize the feedback received from community members to the NRPB after the notifications are delivered.

In case of traffic disturbance, the Contractor shall place notifications on public spaces affected by works.

Community Complaints

Contractor shall develop a written process for managing community complaints related to project activities. When a community member has a grievance to submit then:

- The site supervisor shall be contacted immediately and communicate with the complainant.
- If the problem can be resolved on the spot (level 1) then appropriate measures should be taken by Contractor. The complaint and mitigation measures shall be logged. Complaint will be reported in the monthly progress report.
- In case the nature of the complaint is more complicated (level 2 and 3) but manageable by the Contractor, then a resolution shall be expected within a reasonable timeframe. The complaint shall be reported to NRPB's project manager and complaint officer/social safeguards officer within 24hrs and regularly inform NRPB about progress. Note: GBV complaints are always reported to the NRPB immediately.
- In case the Contractor is not able to efficiently handle a complaint or the nature of the complaint surpasses contractor's responsibilities, then NRPB shall be informed within 24hrs and coordinate the complaint management.

Waste management plan (including pollution prevention, wastewater management, solid waste, hazardous waste management)

Contractor should characterize their waste according to composition, source, types of wastes produced, generation rates, or according to local regulatory requirements. Effective planning and implementation of waste management strategies should include:

- ✓ Review of waste sources during planning, siting, and design activities, including during equipment modifications and process alterations, to identify expected waste generation, pollution prevention opportunities, and necessary treatment, storage, and disposal infrastructure;
- ✓ Definition of opportunities for source reduction, as well as reuse and recycling;
- ✓ Definition of procedures and operational controls for on-site storage;
- ✓ Definition of options / procedures / operational controls for treatment and final disposal;
- ✓ Prevent the commingling of non-hazardous and hazardous waste to be managed;
- ✓ Collect waste and ensure safe storage. Avoid contact with rainwater. Protect from wind blow;
- ✓ Dispose only at authorized sites;
- ✓ Human waste. Use portable toilets on site for safe human wastewater management. Ensure regular empty intervals and disinfection. Dispose sewage at authorized facilities;
- ✓ Gray wastewater from hand washing stations shall be collected and disposed at authorized facilities;
- ✓ Keep sites clean and tide at all times.

Contractor should identify waste materials expected on this project (differentiate between demolition and construction phase if necessary), their disposal method, and handling procedures. An example is given on table below. Contractor shall report metrics of material quantity disposed and keep Chain of Custody papers.

Material	**Quantity**	**Disposal Method/Subcontractor**	**Handling Procedure**
Concrete	xxx	Crushing facility at SXM Pond Island landfill site, operated by xxx	Separate concrete from other materials. Store in 2m3 skip containers. Cover with tarpaulin for air/rain protection.

Common hazardous materials found on construction sites may include diesel, gasoline, solvents, adhesives, paints, cleaning fluids, anti-freeze fluids, car/equipment engine oil or other fluids, batteries, filters.

Contractor shall ensure that the following key points are considered:

- ✓ The Material Safety Data Sheets (MSDS) shall be kept on site for inspection.
- ✓ Identify of locations of hazardous materials and associated activities on an emergency plan site map.
- ✓ Store hazardous materials in an area protected from rain, wind and heat, on impermeable surface.
- ✓ Document of availability of spill response equipment (e.g absorption materials, shovels, bins) sufficient to handle at least initial stages of a spill.
- ✓ Provide of secondary containment, drip trays or other overflow and drip containment measures, for hazardous materials containers at connection points or other possible overflow points. Secondary containment structures shall be inspected to ensure the integrity and remove any liquid accumulation.
- ✓ Not comingle empty containers or tools (e.g. paint buckets and brushes) with other solid waste. Collect and dispose separately in accordance with local requirements.
- ✓ Hazardous waste containers shall be labeled as such.
- ✓ Paints, solvents and other hazardous fluids should not be poured or washed into the drain.
- ✓ PPEs are available for workers in contact with such materials.