

**Sint Maarten National Recovery Program Bureau  
(NRPB)**

**Improving Mental Health Services in Sint Maarten  
(P177679)**

**ENVIRONMENTAL AND SOCIAL  
COMMITMENT PLAN (ESCP)**

**Updated Version**

**Negotiated**

**16 December 2024**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Sint Maarten National Recovery Program Bureau (NRPB) (the Recipient) is implementing the Improving Mental Health Services in Sint Maarten Project (the Project), with the involvement of the Ministry of Public Health, Social Development and Labor (VSA), as set out in the Original and Additional Grant Agreement (the Agreements). The International Bank for Reconstruction and Development (the Bank), acting as the administrator of Sint Maarten Hurricane Irma Reconstruction, Recovery and Resilience Single-Donor Trust Fund, has agreed to provide the original financing and additional financing for the Project, as set out in Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient Director of the NRPB. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT</b>			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain the Project Implementation Unit (PIU) with qualified staff and resources to support management of environmental, social, health and safety (ESHS) risks and impacts of the Project including an environmental specialist and a social specialist, assigned to support the Project.</p>	Maintain the PIU as set out in the legal agreement. Continue to assign an environmental specialist and a social specialist throughout Project implementation.	NRPB
B	<p><b>CAPACITY BUILDING MEASURES</b></p> <p>Facilitate the preparation and implementation of the following capacity building measures, as appropriate and applicable: training for PIU staff, Project workers, contractors and supervision firms on E&amp;S instruments requirements and implementation, community health and safety, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), emergency prevention and preparedness, and managing contractors E&amp;S performance.</p>	Training to be delivered throughout the Project period	NRPB
<b>MONITORING AND REPORTING</b>			
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Bank six-monthly monitoring reports on the ESHS performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> <li>• Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan (SEP) over the reporting period.</li> <li>• Complaints submitted to the grievance mechanism and progress made in resolving them.</li> <li>• E&amp;S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports.</li> <li>• Number and status of incidents and accidents reported under action E below.</li> </ul>	Submit six-monthly reports to the World Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 45 days after the end of each reporting period, as part of the overall Project Reports.	NRPB
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&amp;S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank upon request.</p>	Submit the monthly reports to the Bank upon request.	NRPB

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; pollution of the environment; SEA/SH; or disease outbreaks. Provide available details of the incident or accident to the Bank.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Bank no later than 72 hours after learning of the incident or accident. Provide available details.</p> <p>Provide review report and Corrective Action Plan to the Bank no later than 10 business days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	NRPB
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN</b></p> <p>Update, consult, adopt, disclose, and thereafter implement the Environmental and Social Management Plan (ESMP) for Component 2 of the Project, consistent with the relevant ESSs.</p>	<p>Submit the final ESMP for the Bank's prior review and no objection, adopt, and disclose the ESMP before launching the bidding process for the respective Project activity. Once adopted, implement the respective ESMP throughout Project implementation.</p>	NRPB
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the ESMP, the Labor Management Procedures (LMP), and Code of Conduct, into the E&amp;S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter, ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&amp;S specifications of their respective contracts. Provide copies of the relevant contracts with supervision firms, contractors, and subcontractors to the Bank.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Provide copies of relevant contracts to the Bank upon request.</p>	NRPB
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Implement the Labor Management Procedures (LMP) for the Project.</p>	<p>Throughout Project implementation.</p>	NRPB

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>a) Operate a grievance mechanism for Project workers, as described in the LMP and the NRPB's institutional GRM and consistent with ESS2.</p> <p>b) Require contractors and supervising firms to establish and operate a grievance mechanism for their workers.</p>	<p>a) Operate the grievance mechanism throughout Project implementation.</p> <p>b) Prior to engaging contractor's and supervising firms' workers and thereafter maintain and operate it throughout contract implementation.</p>	NRPB
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT</b></p> <p>Implement the waste management measures in the ESMP prepared under action 1.1 above to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Same timeframe as for the implementation of the ESMP.	NRPB
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Implement the resource efficiency and pollution prevention and management measures in the ESMP prepared under action 1.1 above.</p>	Same timeframe as for the implementation of the ESMP.	NRPB
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Implement the measures to manage traffic and road safety risks in the ESMP prepared under action 1.1 above.</p>	Same timeframe as for the implementation of the ESMP.	NRPB
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Implement the measures to manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers and response to emergency situations, as part of the ESMP prepared under action 1.1 above.</p>	Same timeframe as for the implementation of the ESMP.	NRPB
4.3	<p><b>SEA AND SH RISKS</b></p> <p>Implement the SEA/SH prevention and response measures, proportionate to the risks of the Project, including availability of a list of services for victims of SEA/SH, adoption of the Code of Conduct by all workers, and adequate treatment of SEA/SH grievances in the Project level GM, as reflected in the SEP and LMP. These measures shall also be included in the ESMP prepared under action 1.1. above.</p>	Implement SEA/SH prevention and response measures throughout Project implementation.	NRPB
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
ESS5 is not currently relevant.			
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
ESS6 is not currently relevant.			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
ESS7 is not currently relevant.			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CULTURAL HERITAGE RISKS AND IMPACTS</b></p> <p>Implement the cultural heritage management measures as part of the ESMP prepared under action 1.2. above, and consistent with ESS8.</p>	Same timeframe as for the implementation of the ESMP.	NRPB
8.2	<p><b>CHANCE FINDS</b></p> <p>Implement the chance finds procedures in the ESMP prepared under action 1.2. above.</p>	Same timeframe as for the implementation of the ESMP.	NRPB
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
ESS9 is not currently relevant.			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN</b></p> <p>Implement the SEP for the Project, consistent with ESS10, including measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. This includes measures to consult the E&amp;S instruments for the Project.</p>	Implement the SEP throughout Project implementation.	NRPB
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Maintain and operate the existing NRPB mechanism throughout Project implementation.	NRPB
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>			
The following actions are indicators for implementation readiness: All indicators for implementation readiness of the additional financing have been met.			