NATIONAL RECOVERY PROGRAM BUREAU

WASTEWATER MANAGEMENT PROJECT (SWMP)

Project No.: P179067

ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN (ESMP) FOR THE REHABILITATION OF A.T. ILLIDGE ROAD WASTEWATER TREATMENT PLANT (WWTP)

May 11th, 2026

Contents

1. Introduction

The National Recovery Program Bureau (NRPB) engaged a consultancy (Design Firm) to prepare a plan for upgrading and rehabilitating the A.TH. Illidge Road Wastewater Treatment Plant (WWTP) and expanding the sewer network in the Greater Cul-de-Sac area. This engagement requires undertaking an assessment of the environmental and social conditions, risks, and impacts associated with the upgrade and rehabilitate the WWTP, as well as an evaluation of the capacity of receiving water bodies to handle effluent discharge. As a result, the Design Firm has prepared an Environmental and Social Impact Assessment (ESIA) that identifies the risks and impacts of the proposed works, including cumulative impacts arising from the sewer network expansion, and defines the mitigation measures needed to manage those risks and minimise negative impacts to acceptable levels.

This Environmental and Social Management Plan (ESMP) has been developed to describe how the mitigation measures defined in the ESIA will be delivered during the construction and operation stages of the project: it formalizing how the potentially significant environmental and social impacts will be reduced, minimized, and managed to ensure the project is delivered in accordance with applicable Sint Maarten legislation and the World Bank Environmental and Social Framework (ESF), and outlines the monitoring procedures to ensure proper implementation of the mitigation measures and timely response to emerging risks.

The ESMP is structured around three mitigation tables from the ESIA covering the construction phase, the operation phase, and cumulative operational impacts. It also includes annexes containing the Contractor's Reporting Template and the Incidents and Accidents Reporting Form that will form key parts of the monitoring procedures.

2. Environmental and Social Mitigation Measures & Actions Required for Implementation

This section presents all environmental and social mitigation measures and actions identified in the ESIA that are required to ensure construction and operation procedures are in accordance with national legislation, the general (and particular) conditions of the contract laid out in the RfB, the WB E&S requirements and any other applicable E&S requirements. The ESMP does not repeat the impact assessment contained in the ESIA but instead adopts the measures from the ESIA and describes how they will be delivered; it defines the actions, responsibilities, timeframes, and monitoring requirements that are needed to operationalize the mitigation measures.

The measures are organized across three tables according to project phase, as set out in the ESIA. The two annexes to the ESMP contain the reporting tools to be used by contractors that will be integral for monitoring performance during the construction phase.

Table 1 covers the construction phase and summarizes proposed mitigation measures by thematic area and impact type, including the timeframe for implementation, required actions, applicable national legal and policy requirements, relevant General Conditions of Contract (GCCs) found in the RfB, and the responsible implementing agent. Table 2 provides an equivalent summary for the operation phase. Table 3 addresses cumulative impacts during the operation phase arising from the expansion of the sewer network and upgrade of the WWTP, including increased WWTP discharges and effects on the Fresh Pond ecosystem.

Following implementation of the proposed measures, most negative impacts are expected to be reduced to a non-significant level, as assessed in the ESIA significance evaluation. Where applicable, mitigation measures also serve to enhance the positive impacts of the project.

Table 1 – Environmental & Social Mitigation Measures: Construction Phase

The following Table presents the mitigation measures to be implemented in the construction phase, pre-, during, and post-works. It addresses impacts across a range of environmental and social thematic areas, including geology and hydrogeology, surface water and groundwater quality, air quality, noise and vibration, waste management, ecology, occupational and community health and safety, and social and labor conditions. Many of the measures are required to be delivered by the construction Contractor, and therefore the 'actions' column of the Table indicates how they will be integrated into the works Contract (which is to be based on the FIDIC Red Book General Conditions of Contract and WBG Standard Procurement Document).

Some measures are required to be in place prior to the commencement of works, including the preparation of Management Strategies and Implementation Plans (MSIPs) and the obtaining of required permits, while others apply continuously throughout the works, and others are required post-works.

The Contractor is the primary implementing agent for the measures described in this table and is responsible for preparing the required plans, obtaining necessary permits, and ensuring that all site activities are carried out in compliance with the construction contract requirements. The NRPB is responsible for ensuring the construction contract contains appropriate requirements to cause the contractor to deliver the mitigation measures, and will perform the role of 'Employer' under the construction contract. As Employer, the NRPB will appoint a consultant to perform the role of 'Engineer' in the construction contract and ensure that the Engineer performs its duties, including monitoring and verifying compliance with contract requirements, and advising the contractor on measures that may be needed to comply with requirements. The Ministry of VROMI is responsible for the issue of any required permits, and for monitoring compliance with specific areas, including with respect to compliance with environmental regulations. The Ministry of Public Health, Social Development, and Labor (VSA)[1] is responsible for monitoring for regulatory compliance with respect to public health and labor concerns. Where non-compliance is identified, corrective action must be taken in accordance with the construction contract and/or national laws as applicable.

[1] In the Dutch language: Ministerie van Volksgezondheid, Sociale Ontwikkeling en Arbeid.

Environmental/Social Impact		Timeframe	Mitigation Measures	Action(s) required to integrate requirement into Construction Contract	Legal Requirements & Applicable Policies/Plans	Applicable General Conditions of Contract (GCCs)	Responsible Agent(s) to integrate and implement actions
See Section 7, ESIA			See Section 8, ESIA		See Section 4, ESIA	See Sections VII, VIII, & IX in the RfB	
Thematic Area	**Impact**						

Geology & Geomorphology	**Geological & Hydrogeological Affectation**	• Pre-construction
		
		• Civil Works Permit must be obtained prior to the commencement of works. Civil works permit required for major works including excavation. Approval timeline up to 60 days (+30-day extension). Decision made public for 6 weeks before works can start.
		  ○ Compliance during works
			MC1 - Restrict work to the minimum necessary for the execution of the works.	No further action is needed. General Conditions of Contract already require the following:
				• The Contractor shall confine the Contractor's operations to the Site.
				• Work areas shall be fenced for the protection of the adjacent land, the facility users and public.
				• The Contractor shall take all necessary measures to protect the environment (both on and off the Site).
				
				In accordance with the Duty of Care under national legislation and permits; if negative impacts are unavoidable, then impacts must be minimized as much as possible. In this case, this is especially applicable to the Fresh Pond, an Important Bird (and Biodiversity) Area (IBA).
					• Art. 28a, National Ordinance on Spatial Development Planning (AB 2021, no. 06)
					  ○ **Civil works permit** required for 'major' works including water-related works and excavation.
					  ○ *Subject to discretion of VROMI on the extent of works that is considered 'major works'
					
					• National Decree containing general measures laying down rules on the management and protection of flora and fauna as well as natural parks
					Art. 2, Duty of Care, Art. 17 (if applicable), Art. 18, and Art. 16 of the (**Nature Decree*)***
					
					• National **Wastewater Ordinance**, Article 3 General Duty of Care
						• Sub-Clause 4.1 (Contractor's General Obligations)
						
						• Sub-Clause 4.18 (Protection of the Environment)
						
						• Sub-Clause 4.22 (Contractor's Operations on Site)
							• Necessity for a civil works permit is subject to the review of the Ministry of VROMI
							
							• VROMI must process Notification for Hindrance Permit
							
							• Contractor must prepare technical documentation for any permit application or notification
							
							• NRPB applies for or submits notifications for any permits
							
							• Contractor

		• Notification of works, with all necessary documentation, must be submitted to VROMI at least 4 weeks prior to the commencement of the works in order to ensure that the project activities fall within the premise of the current Hindrance Permit (*HP.12.006) of the WWTP*		**Hindrance Permit HP.12.006** covers the operation of the WWTP as it is currently established. According to Final Report on Environmental Standards for Sint Maarten 2025 (the 'Report'), and article 15(a) of the Hindrance Ordinance, the permit applies not only to the establishment of a facility but also to the facility's *establishment, expansion, modification of operation(s), and/or operation(s)*. Therefore, the rehabilitation and upgrade of the WWTP constitutes a **modification** of the existing facility and may not need a new permit or formal amendment. Instead, a **notification** must be submitted to the Ministry of VROMI at least **four (4) weeks** before construction commences; including information on the nature and scope of activities, the layout and updated design capacity, discharge details (including flow rates and expected effluent concentrations), and an emissions assessment. **The key risk** is that the construction activities are not covered by the existing operational hindrance permit, and a new permit will be required. If this is the case, then an application must be submitted at least 18 weeks prior to the start of the construction. It is strongly advisable to clarify with the Minister of VROMI whether a permit amendment or notification will suffice, and to initiate that process well in advance of construction commencing.	• National Ordinance containing measures with regard to setting up establishments that may cause nuisance, damage or danger (AB 2015, no. 9) [**Hindrance Ordinance**] **Hindrance Permit is already obtained for WWTP, with permit number **HP.12.006.*** • Final Report on Environmental Standards for Sint Maarten 2025, assessing the current and upcoming norms of the Hindrance Permit; Articles 1.10, 1.21, and FAQs	(see above)	• NRPB must notify VROMI of upgrade and rehabilitation of the WWTP to ensure current Hindrance Permit is applicable to project.

		Prior and During Construction	**MC2** - Excavation and landfill work must be interrupted during periods of heavy rainfall and appropriate precautions must be taken to ensure the stability of the trenches.	E&S Specification to include the following: For extreme weather events (storm/hurricane preparedness), Contractor shall prepare an MISP that shall describe the Contractor's proposals for monitoring weather conditions, for assigning roles and responsibilities for preparing the site in advance, and the arrangements that will be put in place 3 days, 2 days and 1 day prior to the expected arrival time of the event, for: ○ Monitoring the weather conditions ○ Notifying workers ○ Securing jobsite materials ○ Securing hazardous materials ○ Plan for water removal ○ Ensure the security of the structure ○ Assess the post-storm damage and plan for recovery actions ○ Have a dewatering pump available at all times in case of flooding risks or heavy rainfalls. ○ Entering into flooded excavations shall be prohibited prior to ensuring the slope stability. The MSIP will also describe how the Contractor will assess the post-storm damage, and plan recovery/continuity actions. Excavations shall be inspected by competent persons following rainfalls. Details shall be provided in the Health & Safety Manual	National labor laws with regard to worker's safety, including: ○ the National Regulation containing provisions for workplace safety in businesses, (AB 2013, GT no. 438) (hereinafter the **Safety Ordinance**) – requires worker safety protections during adverse conditions. ○ **Safety Decrees I-III** (AB 2013 GT no. 348; no. 280; no. 350)	Sub-Clause 4.8 (Health and Safety Obligations)	NRPB Contractor

		During Construction	**MC3** - Use previously selected materials from excavations as backfill material to minimize the volume of excess soil and ensure proper soil management.	The following to be included in the E&S specifications: Excavated soil shall be reused for levelling or as backfilling on the site. If that is not possible it should be transported separately and disposed at the landfill as per VROMI requirements. Contractor shall identify waste materials expected on this project, their disposal method, and handling procedures. Contractor shall characterize the solid waste according to composition, source, types of wastes produced, generation rates, or according to local regulatory requirements	Waste Ordinance (AB 2013, GT no. 135) – for the proper management of excavation and construction *waste*.	Sub-Clause 4.18 (Protection of the Environmen t	NRPB Contractor
Soil	**Soil Contaminati on**	During Construction	**MC4** – If water table is affected, appropriate excavation methods must be selected to mitigate all contamination situations.	E&S Specification to include the following: Contractor shall have in place a procedure to handle any accidental spill. Training shall be provided to workers handling hazardous materials. Incorporate in the training information from Material Safety Data Sheets (MSDSs). Contractor shall have a permanent spill kit appropriate for removing fuel, motor oil or other hazardous liquids that might be accidentally released onto a hard surface or soil. At a minimum the spill kit shall contain: a brush and dustpan, a shovel, nitrile/chemical resistant gloves, a heavy-duty plastic bag to dispose of contaminated materials and a 25kg bag of fine bentonite or equivalent absorption material (pads or	• Hindrance Permit (HP:12:006) • Safety Ordinance • Safety Decrees I-III • Waste Ordinance • Wastewater Ordinance • The National Ordinance for Nature Protection and Management (AB 2013, GT no. 809) **(Nature Conservation Ordinance)** Art. 8A,	Sub-Clause 4.18 (Protection of the Environmen t	NRPB Contractor

				granules for absorbing spills or leaks; sand is not acceptable). Provide 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.	measure ensures protection of SPAW Annex II species • Nature Decree Art. 2, Duty of Care, and Art. 17(1)		
		Prior to completion of Construction	**MC5** – At end of works, unpaved soils must be de-compacted and turned over in areas used to support the work, in order to decompress and aerate them, thus reconstituting, as far as possible, their structure and balance.	No action needed. As per General Conditions of contract requirements: ○ Ground and other surfaces shall be reinstated at its previous conditions. ○ Reinstate all parts of the Site which were affected by the Contractor's activities during the execution of the Works and are not occupied by the Permanent Works;	• Hindrance Permit (HP12:006) • Nature Decree, Art. 2 Duty of Care – reinstatement prevents ongoing habitat degradation	Sub-Clause 10.4 (Surfaces Requiring Reinstatem ent) Sub-Clause 11.11 (Clearance of Site)	Contractor
		During Construction	**MC6** – Before earthmoving, strip the soil and store it in containers for later reuse in areas affected by the work.	E&S Specification to include the following requirements: The Contractor shall, prior to the commencement of any earthmoving, excavation, grading, or related activities, strip all topsoil and other suitable soil layers from areas affected by the Works.	Nature Decree Art. 2, Duty of Care – measure protects soil ecology and reduces habitat disruption	Sub-Clause 4.18 (Protection of the Environmen t	NRPB Contractor Engineer

				Stripped soils shall be separately collected, handled, and stored for later reuse in reinstatement and landscaping works. Topsoil shall be stored in designated stockpiles or containers approved by the Engineer and managed so as to prevent contamination, excessive compaction, erosion, nutrient loss, or degradation of soil structure and fertility. Stockpiles shall be clearly identified, protected from runoff and wind erosion, and located outside active construction zones where practicable. Stored soils shall be reused, as far as practicable, for reinstating disturbed areas, restoring ground surfaces, or supporting final land use requirements, unless otherwise directed or approved by the Engineer. Mixing of topsoil with subsoil or unsuitable materials shall not be permitted without prior approval.			
		During Construction	**MC7** – Use existing accesses (Illidge Road) to avoid creating new ones.	No action needed: General Conditions of Contract already require the following:: ○ The Contractor shall be deemed to have been satisfied, as to the suitability and availability of the access routes to the Site. ○ Provide any Temporary Works (including roadways, footways, guards and fences) which may be necessary, because of the execution of the Works, for the use and protection of the public	• Safety Ordinance • Safety Decrees I-III • Nature Decree Art. 2, Duty of Care – new access routes would cause additional habitat disruption	Sub-Clause 4.15 (Access Route) Sub-Clause 4.8: (Health and Safety Obligations)	Contractor

				and of owners and occupiers of adjacent land and property. • The Contractor shall not interfere unnecessarily or improperly with: (a) the convenience of the public; or (b) the access to and use and occupation of all roads and footpaths, irrespective of whether they are public or in the possession of the Employer or of others.			
		Prior to and during Construction	**MC8** – Have 'Anti-Spill Kit' available in heavy vehicles and next to machines	E&S Specification to include the following requirement: Contractor shall have a permanent spill kit appropriate for removing fuel, motor oil or other hazardous liquids that might be accidentally released onto a hard surface or soil. At a minimum the spill kit shall contain: a brush and dustpan, a shovel, nitrile/chemical resistant gloves, a heavy-duty plastic bag to dispose of contaminated materials and a 25kg bag of fine bentonite or equivalent absorption material (pads or granules for absorbing spills or leaks; sand is not acceptable).	• Hindrance Permit (HP:12:006) • Safety Ordinance • Safety Decrees I-III • Waste Ordinance • Wastewater Ordinance • Nature Decree Art. 2, Duty of Care; Art. 17(1), spill prevention directly protects environment from indirect physical threat • The National Ordinance for Nature Protection and Management (AB 2013, GT no. 809) **(Nature Conservation**	Sub-Clause 4.18 (Protection of the Environment	NRPB • Contractor must ensure compliance with Hindrance Permit • VROMI (permits) may grant or renew Hindrance Permit)

					Ordinance) Art. 8A, measure ensures protection of SPAW Annex II species		
		During Construction	**MC9** – Perform periodic maintenance on machinery, heavy and light vehicles allocated to the work, to ensure good operating conditions, thus reducing noise and combustion gas emissions and avoiding spills.	The E&S Specification to include a requirement for Vehicles and heavy equipment to be maintained in accordance with manufacturer's requirements including to ensure exhaust emissions are within the acceptable limits of the manufacturer. Maintenance records shall be kept by Contractor.	Directly applicable: • Safety Ordinance • Safety Decrees I-III • Hindrance Permit (H12:006) Indirectly applicable: • Nature Decree Art. 2, Duty of Care, measure adverse effects on nature • Environmental Standards (as above), Section 3.1	Sub-Clause 4.1 (Contractor's General Obligations)	NRPB Contractor
		During Construction	**MC10** – Turn off machines and vehicles when not in use.	The E&S Specification will require the Contractor to provide training to his personnel regarding the use of vehicles and machines. Training shall include good practices regarding avoiding idle time.	• Safety Ordinance • Safety Decrees I-III • Hindrance Permit (HP:12:006) • Nature Decree Art. 2, Duty of Care, measure reduces emissions and noise affecting habitat.	Sub-Clause 6.7 (Health and Safety of Personnel)	NRPB Contractor

		Prior to commencement of Construction	**MC11** – Establish fixed routes for movement of machinery, heavy vehicles and light vehicles.	The RfB will request bidders submit a mobilization MSIP for evaluation. As part of the Mobilization MSIP, the Contractor will indicate the arrangements for the proposed Site access to the main road, showing the location and types of traffic control measures that will be put in place, including but not limited to: signs; cones; barriers; signals; flag persons; etc. The plan shall also indicate the main routes to be taken by construction vehicles; and if any temporary road closures would be needed. The plan shall state if the traffic arrangements have been approved by the relevant authorities or when such approval is expected to be sought.	• Safety Ordinance • Safety Decrees I-III • Nature Decree Art. 2, Duty of Care, measure reduces noise disturbance to adjacent fauna • Traffic Ordinance (AB 2013, GT no. 133) must be observed for planning.	Sub-Clause 4.1 (Contractor's General Obligations)	NRPB Contactor
Superficial Hydric Resources	**Changes in surface drainage and runoff** **&** **Water Quality**	During Construction	**MC1** (see above)	(see above)	(see above)	(see above)	(see above)
		During Construction	**MC2** (see above)	(see above)	(see above)	(see above)	(see above)
		Prior to commencement of and during Construction	**MC12** – Implement erosion control measures, such as silt fencing, to prevent runoff from reaching drainage system and Fresh Pond.	The E&S Specification will include the following provisions: ○ Contractor shall install slit fences shall be installed around foundation works for preventing the runoff silt from reaching the Fresh Pond or the drainage system. ○ There is currently a buffer zone of at least 10m between the banks of Fresh Pond and WWTP facilities, creating a	• Hindrance Permit (HP:12:006) • Nature Decree Art. 2, Duty of Care, Art. 17(1) measure reduces disturbance to living environment • The National Ordinance for Nature Protection and	Sub-Clause 4.18 (Protection of the Environment)	NRPB Contractor

				vegetated zone that helps maintain the natural water quality by absorbing and filtering sediments before they reach the watercourse. This zone will be maintained with the new buildings of the rehabilitated project. Contractor shall ensure this zone is not disturbed.	Management (AB 2013, GT no. 809) **(Nature Conservation Ordinance)** Art. 8A, measure ensures protection of SPAW Annex II species		
		Prior to and during Construction	**MC13** – Use permeable materials to support water absorption in the soil.	Relevant specifications will be included in the Scope of Works and E&S Specification parts of the RfB as appropriate.	• Nature Conservation Ordinance • Nature Decree Art. 2, Duty of Care, measure supports natural waster absorption, reduces runoff to natural habitat • Wastewater Ordinance	Section VII - Works' Requiremen ts	NRPB Contractor
		During Construction	**MC14** – Generators must be stored in waterproof locations or on top of an oil and hydrocarbon retention basin.	Relevant specification will be added in the E&S Specification of the RfB, as follows: Provide secondary containment, drip trays or other overflow and drip containment measures, for hazardous materials containers at connection points or other possible overflow points, such as generators. Secondary containment structures shall be inspected to ensure the integrity and remove any liquid accumulation.	• Hindrance Permit (HP:12:006) • Nature Decree Art. 2 Duty of Care; Art. 17(1), fuel/oil containment prevents indirect habitat contamination • The National Ordinance for Nature Protection and Management	Sub-Clause 4.18 (Protection of the Environmen t)	NRPB Contractor

					(AB 2013, GT no. 809) **(Nature Conservation Ordinance)** Art. 8A, measure ensures protection of SPAW Annex II species		
		Prior to and during Construction	Replacement of surface aerators shall be carried out without affecting the effluent quality	Relevant provisions will be incorporated in the Technical Proposal and E&S Specifications. Bidders and/or Contractor will need to propose a methodology that will ensure that the current level of wastewater treatment and effluent quality will not be affected for the duration of works and particularly from the replacement of the surface aerators in the oxidation tank.	• Hindrance Permit (HP:12:006) • Wastewater Ordinance • Nature Conservation Ordinance • Nature Decree	Sub-Clause 4.18 (Protection of the Environmen t)	NRPB, Contractor
Groundwater Resources	**Infiltration reduction** **Water quality**	Prior to and during Construction	**MC1** (see above) **MC4** (see above) **MC8** (see above) **MC9** (see above) **MC14** (see above)	(see above)	(see above)	(see above)	(see above)
Noise	**Increased noise levels**	During Construction	**MC7** (see above) **MC9** (see above) **MC10** (see above)	(see above)	(see above)	(see above)	(see above)

			MC11 (see above)				
		Before RfB launching	**MC15** - Purchase, whenever possible, soundproofed equipment or implement soundproofing techniques in equipment	Relevant specifications will be included in the Scope of Works and E&S Specifications parts of the RfB as appropriate. • The dewatering building will surround all the sludge treatment equipment, providing a soundproof enclosure. • New equipment to be installed is expected to have lower noise levels compared to the existing one.	• Hindrance Permit (HP:12:006) • Nature Decree Art. 2 Duty of Care; Art. 17(2), measure ensures minimal noise disturbance to fauna.	Section VII - Works' Requiremen ts	NRPB Contractor
		During Construction	**MC16** - Mandatory use of PPE - earplugs for workers handling heavy machinery and vehicles	The E&S Specification will include the following requirements: o Hearing protection shall be provided by Contractor where Works will result in Contractor's Personnel being exposed to noise levels of 85dBA or higher (ear defenders or ear plugs to OSHA 1926.101 or another equivalent standard). o Workers shall be trained to the proper use of PPEs.	• Safety Ordinance • Safety Decrees I-III	Sub-Clause 4.8 (Health and Safety Obligations)	NRPB Contractor
		Prior and during Construction	**MC17** - Plan to monitor noise levels if there are complaints during construction.	The E&S Specification will include the following requirements for Contractor: o Ensure that the Works do not result in a maximum increase in background noise levels of more than 3dB at the nearest receptor location off-site.	• Hindrance Permit (HP:12:006) • Nature Decree Art. 2 Duty of Care; monitoring enables response to prevent	Sub-Clause 4.18 (Protection of the Environmen t)	NRPB Contractor

				○ Monitor noise levels if there are complaints during construction. ○ Take additional noise reduction measures in case background noise levels increase more than 3dB at the nearest receptor location off-site ○ Install noise control devices, such as temporary noise barriers, noise quilts or deflectors for noisy activities. ○ Not working outside normal working hours. ○ 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. ○ 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. ○ Do not allow engine idling when not in use.	adverse effects on nature		
Air Quality	**Dust dispersion** **&** **Pollutant gas emissions**	During Construction	**MC7** (see above) **MC9** (see above) **MC10** (see above) **MC11** (see above)	(See Above)	(See Above)	(See Above)	(See Above)

			MC18 - Mandatory use of PPE - masks by workers when carrying out activities that emit particles	The E&S Specification will include the following requirements: ○ Contractor shall provide respiratory protection where dust, fumes, vapours etc, are generated by the Works masks (N95/N99) or respirators (with appropriate filter protection) complying with OSHA 1910.103 or another equivalent standard. Workers shall be trained to the proper use of PPEs.	• Safety Ordinance • Safety Decrees I-III	Sub-Clause 4.8 (Health and Safety Obligations)	NRPB Contractor

			MC19 - Carry out regular spraying, especially on dry and windy days, of work fronts to reduce dust **MC20** - Construction materials must be packaged and covered, such as with a tarpaulin, to prevent thinner materials, such as aggregates and other materials, from being blown away by the wind. Also, cover the open boxes of earthmoving vehicles.	The E&S Specification will require:. Contractor will be responsible for minimizing dust emission as a result of works activities, monitoring dust levels, comply with WB EHS limits and apply mitigation measures. Those measures may include among others: ○ Take appropriate measures to suppress dust generation, especially during active construction works that may create a lot of dust, such as cutting or sawing silica-containing materials, jack hammering, trenching, impact drilling, using heavy equipment, and during the dryer seasons. ○ Limit soil piling and cover loose materials to avoid wind drifting. ○ 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;	• Hindrance Permit (HP:12:006) • Safety Ordinance • Safety Decrees I-III • Nature Decree Art. 2 Duty of Care; MC19 protects habitat (vegetation and water bodies); MC20 prevents airborne contamination of adjacent habitat.	Sub-Clause 4.8 (Health and Safety Obligations)	NRPB Contractor

				○ Dust suppression techniques should be implemented, such as applying water or non-toxic chemicals to minimize dust from vehicle movements and earthworks; ○ Truckloads of loose materials should be covered; ○ Truck speed should be regulated. ○ Vehicles and heavy equipment should follow the recommended maintenance schedule to ensure exhaust emissions are within the acceptable limits of the manufacturer. ○ Inform the immediate community of planned activities which may cause dust emissions in a timely manner. Planning activities in consultation with local communities and particularly with sensitive receptors, so that activities with the greatest potential to generate dust are planned during periods of the day/week that will result in least disturbance.			

Waste	**Waste production and management**	Pre-construction to Implement during Construction Works and Operation of the WWTP	**MC21** - Implementation of Waste Management Plan	The E&S Specifications will require the following: Contractor shall develop a plan and identify waste materials expected on this project, their disposal method, and handling procedures. Contractor shall report metrics of material quantity disposed and keep Chain of Custody papers. Contractor shall comply with the Waste Ordinance regulations. Contractor shall characterize the solid 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: o 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;	Primary: • Waste Ordinance Secondary: • Nature Decree Art. 2, Duty of Care, measure prevents adverse impacts to nature	Sub-Clause 4.18 (Protection of the Environment)	NRPB Contractor

				○ Definition of opportunities for source reduction, including exploring processes or technologies to reduce the amount of excavated material, 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 timely and ensure safe storage. Avoid contact with rainwater. Protect from wind blow; ○ Dispose only at authorized sites; ○ Keep sites clean and tidy at all times. ○ Concrete from C&D works will be collected separately and transported to MSW for disposal as per VROMI requirements. Rebar shall be removed from concrete ○ The size of waste materials disposed at the landfill shall not exceed 15cm. ○ Metal waste shall be delivered to authorized facilities.			

Biodiversity	**Vegetation and biotopes affectation** **&** **Fauna disturbance and mortality**	Preparation for and during works	**MC1** (see above) **MC8** (see above) **MC9** (see above) **MC12** (see above) **MC15** (see above) **MC19** (see above) **MC20** (see above)	(see above)	(see above)	(see above)	(see above)
		Same as above	**MC22** – All staff from the Contractor must be aware of the surrounding biodiversity, with special emphasis on Fresh Pond. Training sessions prior to works must be held.	The E&S Specifications will request Contractor to provide training on this topic as part of induction training.	• Staff training in biodiversity awareness upholds Nature Decree Art. 2 Duty of Care; and Art. 17 (fauna prohibitions) and Art. 18 (flora prohibitions) - training assists in implementing specific prohibitions in the Decree. • Staff should also be trained on Nature Conservation Ordinance Art. 7A/8A – CITES and SPAW prohibitions	Sub-Clause 4.8 (Health and Safety Obligations)	NRPB Contractor

		Same as above	**MC23** - Land clearing, with removal of vegetation, should only occur in areas strictly necessary for the work, avoiding, whenever possible, the felling of trees.	No further action required. The General Conditions of Contract state that: ○ The Contractor shall confine the Contractor's operations to the Site. ○ The Contractor shall take all necessary measures to protect the environment (both on and off the Site). This mitigation measure addresses land clearing and felling of trees, therefore such activities fall under the requirements of a civil works permit. The need and granting of such permit is determined by the Ministry of VROMI after reviewing all applicable documentation.	• Potential need for Civil Works Permit at the discretion of Ministry of VROMI • Nature Decree Art. 2 Duty of Care; Art. 17 (1)(2) & Art. 18 – clearing risks disturbing/destroying nests, breeding places and living environments of any protected fauna; and destroying plant species such as Mangroves, although not formally protected locally do fall under the SPAW Protocol. • Nature Conservation Ordinance Art. 7A and Art. 8A, measure ensures protection of SPAW Annex II and CITES species	• Sub-Clause 4.18. (Protection of the Environment • Sub-Clause 4.22 (Contractor's Operations on Site)	Contractor, VROMI (permits)
		During works	**MC24** - Carry out machinery movements and worker movements at times that minimize disturbance to wildlife, avoiding	No further action needed. The General Conditions of Contract for the construction contract require: ○ The Contractor shall take all necessary measures to protect the environment (both on and off the Site);.	Nature Decree Art. 2 Duty of Care; Art. 17(1)(2), measure directly implements the prohibition on disturbing protected fauna and their nests/breading places.	Sub-Clause 4.18 (Protection of the Environment	Contractor

			breeding periods or times when animals are most active.				
		Preparation for works	**MC25** - Choose construction site locations with reduced vegetation, reducing interference with valuable soils and sensitive natural habitats, avoiding areas with high biodiversity and critical ecosystems.	No further action needed. The Design Firm has taken under consideration the current WWTP layout and confirmed that the areas needed for completing the works can be contained within the current boundary of the facility, avoiding areas closest to the Fresh Pond.	• Nature Decree Art. 2 Duty of Care; Art. 17; Art. 18 – measures minimize risk of violating specific prohibitions. • Nature Conservation Ordinance Art. 7A and Art. 8A, measure ensures protection of SPAW Annex II and CITES species.	Section VII - Works' Requiremen ts	
Land Use	**Land use affectation**	During works	**MC1** (see above) **MC25** (see above)	(see above)	(see above)	(see above)	(see above)
Landscape	**Visual intrusion**	Preparation/plan ning for works	**MC1** (see above) **MC25** (see above)	(see above)	(see above)	(see above)	(see above)
		During Construction	**MC26** - Whenever possible, position construction	No further action needed. The Design Firm has taken under consideration the current WWTP physical characteristics and proposed interventions and designed	Hindrance Permit (HP:12:006)	Section VII - Works' Requiremen ts	

			structures and materials in locations that minimize their visual impact, in areas that are already disturbed, reducing visibility in panoramic views.	the works such that they will not result in noticeable visual impacts.			
Socio-Economy & Public Health	**Improved Employment and Economy**	Pre-construction	**MC27** - Implement a Recruitment and Vocational Training Plan that prioritizes the inclusion of local workforce, focusing on youth from nearby communities; promoting equal employment opportunities for men and women, with special attention to the recruitment of vulnerable groups.	The RfB will require the Contractor to allocate not less than 30% of the total labour cost under the contract to the employment of local Contractor's Personnel (local labour) with appropriate skills and experience. Bidders will be requested to submit a Method Statement that demonstrates their approach and methodology to engaging local labour during the execution of the contract. This Method Statement will be part of the contract and updated as appropriate during contract execution	• Compliance with the conditions stipulated in the RfB. • Execution of the terms of the Method Statement	RfB ITB16	NRPB Contractor

			MC28 - Establish partnerships with local suppliers and companies in the project's areas of influence to purchase materials, goods, and services.	The General Conditions of Contract require the Contractor to submit a Construction Schedule for the Works in line with project duration. Procurement lead times for obtaining materials, goods and services from local suppliers and local labor restrictions will need to be considered by Contractor when drafting the Schedule, and shown on the schedule to the approval of the Engineer.	Sint Maarten Labor Laws	RfB	NRPB Contractor Engineer
	Staff Circulation	During Construction	**MC30** - Implement a Traffic Plan that establishes periods for the circulation of heavy vehicles as well as speed limits within the perimeters of the areas affected by the project.	The E&S Specification will include a requirement for the Contractor to prepare an MSIP about Traffic and Site Circulation, and the following requirements: . The Contractor shall inspect the access to the Site and the local roads and identify hazards or risks to other road users, public, septic truck drivers and Contractor’s Personnel that might arise, including from use of the Contractor’s Equipment and during delivery of Materials/Equipment. The Contractor shall provide traffic management measures to the satisfaction of the Engineer to manage these risks and protect all road and WWTP	• Safety Ordinance • Safety Decrees I-III • Traffic Ordinance must be observed for planning, specifically Articles 22, 23, 60A, and 63 which regulate heavy vehicle loads, dimensions, and	Sub-Clause 4.1 (Contractor's General Obligations)	NRPB Contractor Engineer

				facility users and persons during the Works. As part of the traffic management measures, the Contractor may provide traffic signals and provide warning signs, barriers, traffic calming measures, road markings and other measures as needed to alert all road users of hazards and risks and provide a means for safe passage. The dimensions and legibility of signs shall be in accordance with local legislation and relevant international standards. Contractor shall brief workers, WWTP facility personnel and septic truck drivers on the hazards and controls that are in place. The Contractor shall inform the Engineer if VROMI and/or the Police notification or consent is required prior to undertaking work activities and follow the Engineer's instructions accordingly. The Contractor shall prepare suitable annotated drawing(s) of the proposed traffic management measures in advance of the works, for the Engineer's approval. The annotated	restricted hours on public roads.		

				drawings shall show as a minimum: ○ Site access routes ○ entry gates, storage area(s) and parking areas ○ locations and types of traffic signals, barriers, road markings and traffic calming measures ○ other measures as needed to comply with the ES Requirements The Contractor shall provide an appropriately trained Banksman to guide construction equipment (including deliveries) as they enter, leave or manoeuvre on Site. Where necessary, the Banksman and driver shall be provided with two-way radio to ensure no miscommunication. The Contractor shall ensure that no trucks, excavators or other construction machinery shall use public roads between the hours of: 06:30 – 08:30 AM and 12:00 – 2:00 PM, the peak traffic hours. The Contractor's traffic management shall ensure that the Contractor's Equipment does not occupy			

				or block access to the community parking spaces in the vicinity of the Site. Parking of the Contractor’s cars/vehicles/equipment outside of the Site or inside the WWTP facility shall not be allowed without the prior approval of the Engineer. The Contractor shall not block local streets/roads 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. The Contractor’s traffic management shall ensure that septic trucks can continue discharging their load in the respective facility, unobstructed for the duration of the works. Contractor shall assess if a dedicated flag person is required for guiding traffic in that area.			
	Conflicts with the local population	Pe-Construction and During Construction	**MC31** - Implement a Labour and Community Grievance	No further action required. As per Sub-Clause 6.26 of the Particular Conditions of Contract, the Contractor shall have a grievance mechanism for Contractor’s	RfB	Sub-Clause 6.26 (Contractor’s Personnel	Contractor NRPB

	Change in Quality of Life		Redress Mechanism (GRM) within the construction site	Personnel, and where relevant the workers' organizations stated in Sub-Clause 6.24, to raise workplace concerns. The grievance mechanism shall be proportionate to the nature, scale, risks, and impacts of the Contract. The mechanism shall address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution, and shall operate in an independent and objective manner. The Contractor's Personnel shall be informed of the grievance mechanism at the time of engagement for the Contract, and the measures put in place to protect them against any reprisal for its use. Measures will be put in place to make the grievance mechanism easily accessible to all Contractor's Personnel. The E&S Specification to include a requirement for the Contractor's to adopt a GRM for members of the community to lodge their complaints. The NRPB's Labour GRM is available for project workers under the whole portfolio and also for the public: the E&S Specifications will require the Contractorto refer any community complaints with a SEA/SH component to the NRPB's GRM and will be dealt with		Grievance Mechanism)	

				appropriately. Depending on the needs of the complainant, referral to service providers and/or law enforcement will take place.			
	Impact on Individual and Community Health	Pe-Construction and During Construction	**MC29** - Implementation of Health & Safety Plan that include work procedures as well as a regular Training Plan on workplace safety and community relations (Code of Conduct)	No further action needed. As per General Condition of Contract Sub-Clause 4.8, the Contractor shall submit to the Engineer for Review a health and safety manual which has been specifically prepared for the Works, the Site, and other places (if any) where the Contractor intends to execute the Works. The manual shall include details of the training to be provided and records to be kept. The Contractor shall prepare MSIPs (sub-clause 4.1) and Job Safety/Hazard Analysis (JSA/JHA) for the different tasks on each site, for the Engineer's approval, where the safety measures for the execution of the works shall be detailed. The MSIPs and JSA/JHA shall describe the specific measures for the safe construction/installation and the use of equipment. All hazards identified must be prioritized. The MSIPs & JSA/JHA must be communicated to all workers involved with the task prior to beginning the task.. As per Sub-Clause 4.25, The Contractor shall have a Code of Conduct for the Contractor's Personnel. The Contractor shall take all necessary measures (including	• RfB • Safety Ordinance • Safety Decrees I-III	• Sub-Clause 4.1 (Contractor's General Obligations) • Sub-Clause 4.8 (Health and Safety Obligation) • Sub-Clause 4.25 (Code of Conduct)	Contractor Engineer

				training) to ensure that each Contractor's Personnel is made aware of the Code of Conduct.			
		During Construction	**MC29** (see above) Contractor reporting on incidents/accidents	Although the General/Particular Conditions of Contract require that the Contractor to provide immediate (and in writing within 24 hours) notification to the Engineer and in turn the NRPB of incidents, the E&S Specification shall include provisions to: ○ define the types of incident to be reported and form of the report (Annex 2) and ○ require root cause analysis and subsequent proposals to prevent future incidents to be prepared and agreed with the Engineer and NRPB, within 3 days. ○ notify the authorities (VSA) for any injuries or fatalities according to legislation. The TOR for the consultant engaged as 'Engineer' to the construction contact shall require that they also investigate all incidents reported by Contractor and opine on the adequacy of the measures proposed in the Contractor's root cause analysis/investigation report to prevent recurrence, and as necessary propose additional measures. The General Conditions	• Safety Ordinance • Safety Decrees I-III	Sub-Clause 4.20 (Progress Reports)	NRPB Contractor Engineer

				of Contract require the Contractor to follow the instructions of the Engineer, should this prove necessary to avoid recurrence of incidents.			
		During Construction	**MC29** (see above) Excavations Safety	The E&S Specification shall contain provisions as follows: • Contractor shall ensure that all excavation or void areas will need to be barricaded and provided with signs to prevent risk of workers falling into them. • Contractor shall provide ladders, steps, ramps, or other safe means of egress for workers working in pits/excavations 1.2 meters or deeper. • Provide support to trench walls (unstable soil) to avoid collapsing. • 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. • Drain out rainwater or ground water.	• Safety Ordinance • Safety Decrees I-III	Sub-Clause 4.8 (Health and Safety Obligations)	NRPB Contractor
		During Construction	**MC29** (see above) Safety around moving equipment	The E&S Specification shall contain provisions as follows: • Contractor shall ensure that all personnel working on the ground must keep clear of moving equipment, wear high visibility vests and never work behind a working machine. Machine operators are not	• Safety Ordinance • Safety Decrees I-III	Sub-Clause 4.8 (Health and Safety Obligation)	NRPB Contractor

				to move equipment without facing in the right direction; • Ensure moving equipment is outfitted with audible back-up alarms; • Establishing rights-of-way and site speed limits; • Training of workers to verify eye contact with equipment operators before approaching the operating vehicle; • Using inspected and well-maintained lifting devices that are appropriate for the load.			
		Pe-Construction and During Construction	**MC29** (see above) Facilities for personnel	Although the General and Particular Conditions of Contract include appropriate provisions, if needed the E&S Specification will include the following: The contractor shall: • Arrange safe drinking water for workers; • Provide adequate sanitation facilities (toilets and washing areas) at the work location. (Separate facilities for men and women) • Shade/rain protection and sitting for all personnel.	• Safety Ordinance • Safety Decrees I-III	Sub-Clause 6.7 (Health and Safety of Personnel)	NRPB Contractor

		Pe-Construction and During Construction	**MC29** (see above) Training for personnel	The E&S Specification shall include the following requirement; In addition to Sub-Clause 6.7 and Sub-Clause 4.8, as a minimum the general induction: General Induction for Construction Workers: Safety, Health and the Environment (https://www.wbgkggtf.org/node/3823), shall be provided as training to all Contractor's Personnel. Each Contractor's Personnel shall receive the general induction prior to their start of any Works activity on site, and at least annually thereafter. Records of the general induction training provided shall be kept. The record shall include a copy of the induction given and as a minimum the following details: ○ Name and signature (or mark) of trainee(s) ○ Employer/ organization they work for ○ Date of induction training attended In reference to Sub-Clause 4.8 toolbox talks shall form part of the health and safety training to Contractor's Personnel. Toolbox talks shall provide health and safety information that is specific to the safe undertaking or an activity and shall be provided to the relevant Contractor's Personnel immediately prior to them starting the activity. Toolbox talks shall be repeated as	• Safety Ordinance • Safety Decrees I-III • RfB	• Sub-Clause 4.8 (Health and Safety Obligations) • Sub-Clause 6.7 (Health and Safety of Personnel)	NRPB Contractor

				needed to ensure Contractor’s Personnel understand and implement the activity safely and without causing harm.			

				The E&S Specification shall include the following: In reference to Sub-Clause 6.27: Sensitization on prohibition of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) and on the prevention of SEA and SH by supervising personnel shall cover as a minimum: ○ Behaviors or actions that could be considered SEA/SH ○ How the Contractor's Personnel can make a complaint with respect to SEA/SH, and how that complaint will be handled ○ What could happen if the Contractor's Personnel is found to have committed SEA/SH Contractor shall create and maintain a digital training overview database with relevant information (names of all employees including subcontractors, status and date of induction training, status and date of CoC training, status and date of GBV training, status and date of toolbox training, etc.). The database shall be updated weekly and be accessible by NRPB and Engineer for review. The Ministry of VSA is responsible for the regulatory oversight and legislative enforcement of public health and safety, as well as labor	• National Ordinance Public Health (AB 2018, 20). • Safety Ordinance • Safety Decrees I-III • RfB	• Sub-Clause 4.8 (Health and Safety Obligations) • Sub-Clause 6.7 (Health and Safety of Personnel)	NRPB Contractor Engineer VSA (regulatory oversight / legislative enforcement)

				concerns. Therefore, the Ministry has a role in ensuring the applicable laws are enforced throughout this project, and personnel trainings are in line with such legislation.			

		Pe-Construction	**MC29** (see above) Sensitive receptors	The E&S Specification will include the following requirement: Contractor shall be responsible for informing the Community closest to the site and actively identifying, before works commence, the presence of individuals with health or other conditions, who are sensitive, and could potentially be disproportionally affected by construction nuisance.	• Safety Ordinance • Safety Decrees I-III	Sub-Clause 4.8 (Health and Safety Obligations)	NRPB Contractor
		Pe-Construction	**MC29** (see above) Community Notification	The E&S Specification shall include the following requirements: Contractor shall prepare a Notification Letter to inform residents of the adjacent community about works duration and expected disturbance. Door to door distribution is necessary. Contractor shall place notifications on public spaces affected by works related to traffic disturbance and relocation of parked cars, as applicable. Contractor shall inform septic truck companies about accessibility alterations, entry/exit arrangements or other aspects that might affect their normal daily business.	• Safety Ordinance • Safety Decrees I-III • RfB	• Sub-Clause 4.8 (Health and Safety Obligations)	NRPB Contractor
	E&S Management & Compliance	Pe-Construction and During Construction	**MC29** (see above) Contractor Staffing	The RfB will require the following personnel to be provided by the Contractor throughout construction: one Environmental, Social, Health and Safety (ESHS) specialist as key personnel, who will be responsible for implementing the contractors' environmental, social, health and safety responsibilities. The required experience and qualifications of the key personnel will be detailed in the RfB.	• Safety Ordinance • Safety Decrees I-III • RfB	Sub-Clause 6.7 (Health and Safety of Personnel)	Contractor NRPB

		Pe-Construction and During Construction	**MC29** (see above) Supervisor Staffing	NRPB shall require the consultant employed to perform the duties of the Engineer to employ one ESHS specialist as key personnel to be in place throughout the duration of the construction works to provide ESHS supervisory skills. The qualifications and experience that are required will be detailed in the TOR for the consultant.	• Safety Ordinance • Safety Decrees I-III • RfB		NRPB Engineer
		Pe-Construction	**MC29** (see above) Contractor's ESMP (C-ESMP)	No further action. The Particular Conditions of Contract require the Contractor to submit comprehensive and concise Environmental and Social Management Strategies and Implementation Plans (ES-MSIP) which shall describe in detail the actions, materials, equipment, management processes etc., that will be implemented by the Contractor, and its subcontractors. The Contractor shall prepare as a minimum MSIPs for each Works activity listed on the Activity Schedule/Program. The Contractor shall not carry out mobilization to the Site unless the Engineer gives approval to the measures the Contractor proposes to address environmental and social risks and impacts. Collectively these MSIPs and the Code of Conduct will comprise the Contractor's Environment and Social Management Plan (C-ESMP).	RfB	Sub-Clause 4.1 (Contractor's General Obligations	Contractor, Engineer
		During Construction	**MC29** (see above)	The Particular Conditions of Contract will include details of the metrics to be included in the Contractor's monthly report (prepared in accordance with sub-clause 4.20) A Reporting Template will be included for Contractors to use	RfB	Sub-Clause 4.20 (Progress Reports)	NRPB Contractor

			Contractor Reporting & Monitoring	in fulfilling their monthly reporting obligations. The Template is attached in ESMP Annex 1. IN addition, and E&S Specification will be included to require the Contractor to develop and regularly update an online database related to site inspection non-conformances, and to participate in regular meetings where ESHS matters will be discussed.			

Table 2 – Environmental & Social Mitigation Measures: Operation Phase

Table 2 presents the environmental and social mitigation measures identified in the ESIA that are required during the operation phase of the upgraded and rehabilitated WWTP. As with Table 1, the measures are organized by thematic area and specify, for each identified impact, the mitigation measures, implementation timeframe, required actions, applicable legal requirements and relevant policies and plans, and the responsible implementing agent.

The operational phase introduces a distinct set of environmental and social considerations compared to the construction phase. Key thematic areas addressed in this table include effluent quality and discharge management, odor and noise from plant operations, occupational health and safety for facility staff, chemical and hazardous materials handling, and community relations. While construction-phase impacts are generally temporary and site-confined, operational impacts are ongoing and require sustained management systems, routine monitoring, and periodic review to remain effective over the life of the facility.

The Design Firm is preparing operational guidelines for the day-to-day operation and maintenance of the upgraded/rehabilitated WWTP, including as needed, elaborated and/or modified Standard Operation Procedures, measures with respect to managing noise, odour, pollution, chemical and hazardous materials, an OHS plan and an emergency response plan. The Design Firm is also advising on the model for concessioning future operations to a private operator. The Ministry of VROMI will have overall responsibility for the WWTP but contract a private operator to undertake day-to-day operations and maintenance of the WWTP.

Although the WWTP operator will be the primary implementing agent for the measures in this table, the operational guidelines will specify the actions they should take for ensuring that day-to-day operations and maintenance are conducted in compliance with the specified measures. By including appropriate requirements into the model contract for the future procurement of private operator, implementing the operational guidelines will be a contractual obligation for any subsequent WWTP operator of the upgraded/rehabilitated WWTP. NRPB will ensure that the operational guidelines are prepared satisfactory and that appropriate contractual obligations are incorporated into the procurement model

During the operations phase, the Ministry of VROMI will provide contractual oversight of the day-to day operations and maintenance at the WWTP, and the Ministries of VROMI and VSA will provide regulatory oversight and permitting.

Local NGOs carry out independent ecological monitoring of the surrounding environment, functioning essentially as third-party watchdogs on biodiversity impacts. While NGOs are not directly responsible for delivering mitigation measures that are required by the ESIA for this project, however their monitoring assessments are crucial in continuously assessing biodiversity impacts. These monitoring assessments are carried out on a regular basis and can therefore be helpful in determining whether conditions change and how the responsible agent (such as VROMI, the Contractor or Operator) can potentially further develop applicable mitigation measures if negative impacts are attributable to the operations of the WWTP. If operational conditions change or new risks emerge, especially impacts to the Fresh Pond, mitigation measures must be reviewed and updated accordingly by the Operator and

VROMI. As the official scientific authority on Sint Maarten (established by national decree), the Nature Foundation (NF) could be engaged as needed by VROMI to collaborate in carrying out monitoring assessments and/or reviewing and updating mitigation measures during the continued operational phase.

Environmental / Social Impact		Timeframe	Mitigation Measures	Action(s)	Applicable Legal Requirements & Policies/Plans	Responsible Agent(s)
See Section 7, ESIA			See Section 8, ESIA		See Section 4, ESIA	
Thematic Area	**Impact**					
Geology and Geomorphology	**Geological affectation** **Seismic risk**	During Design & Maintenance	**MO1** - Restrict work to the minimum necessary for the execution of the maintenance works.	_ NRPB to ensure a suitable requirement is included in the operational guidelines prepared by the Design Firm for the upgraded WWTP, to be followed by the plant Operator, including maintenance practices.	• Hinderance Permit (HP:12:006) • Wastewater Ordinance • Nature Decree, Art. 2 – Duty of Care • Final Report on Environmental Standards for Sint Maarten 2025, Section 3.1, Duty of Care	NRPB Design Firm, VROMI WWTP Operator
			MO2 - Excavation and landfill maintenance work must be interrupted during periods of heavy rainfall and appropriate precautions must be taken to ensure the stability of the trenches.	_Same as MO1	• Hinderance Permit (HP:12:006) • Safety Ordinance • Safety Decrees I-III • Nature Decree, Art. 2 – Duty of Care • Final Report on Environmental Standards for Sint Maarten 2025, Section 3.1, Duty of Care	NRPB Design Firm WWTP Operator VROMI

			MO3 - Use previously selected materials from excavations as backfill material to minimize the volume of excess soil and ensure proper soil management.	Same as MO1 The Duty of Care required by regulation requires the WWTP Operator to take all necessary measures to protect the environment.	• Waste Ordinance – for the proper management of excavation and construction *waste*. • Nature Decree, Art. 2 – Duty of Care	NRPB Design Firm WWTP Operator VROMI
Soil	**Soil contamination**	During Design & Operations	**MO4** - Have "Anti-Spill Kit" available in heavy vehicles and next to machines	_NRPB shall ensure that the Emergency Response Plan included within the operational guidelines prepared by the Design Firm includes the requirement for providing anti-spill kits and describes training needs for efficiently dealing with potential calamities. The emergency response plan shall also propose feasible interventions for improving preparedness and resilience and cover as a minimum incidental discharge, resilience against natural disasters and extreme weather events, flooding, fire, chemical spill, equipment failures and	• Hindrance Permit (HP:12:006) • Nature Decree, Art. 2, Duty of Care; Art. 17(1) • Nature Conservation Ordinance, Art. 8A – applicable for any operational spills reaching Fresh Pond directly • Final Report on Environmental Standards for Sint Maarten 2025 (especially Section 3.1., Duty of Care)	NRPB Design Firm , VROMI, WWTP Operator

				occupational accidents. Similarly, NRPB shall ensure that the Occupational Health and Safety Plan to be developed by the Design Firm as part of the operational guidelines, includes details about responding to emergencies.		
		During Contract preparation & Maintenance	**MO5** - Perform periodic maintenance on WWTP equipment, heavy and light vehicles allocated to the work, to ensure good operating conditions, thus reducing noise and combustion gas emissions and avoiding spills.	Same as MO1 As set out in the operational guidelines, the Maintenance Schedule will require daily inspections of all equipment, lubrication intervals and replacement of worn parts. Maintenance should be preventive and according to equipment manufacturer manuals.	• Safety Ordinance • Safety Decrees I-III • Hindrance Permit (H12:006) • Nature Decree Art. 2, Duty of Care • Final Report on Environmental Standards for Sint Maarten 2025, Sections 3.7 Noise and 3.8 Vibration	NRPB, Design Firm, WWTP Operator, VROMI

		During Contract preparation & Operations	**MO6** - Proper deposition of sludge layers in the landfill	NRPB are currently procuring a design and build contractor to rehabilitate and close the landfill site. The tender requires the selected contractor to utilize the sludge for soil improvement after proper treatment as part of the rehabilitation and closure process.	Primary: Waste Ordinance Secondary: Nature Decree Art. 2, Duty of Care	NRPB, Landfill Contractor, Landfill Engineer, WWTP Operator, VROMI
Climate Change	**Effect on Climate Change (GHG Emissions)**	During Maintenance	**MO5** – (see above)	(see above)	(see above)	(see above)
	Effect of Climate Change (project adaptation)	During Design	**MO7** – Improvement of power consumption with more efficient aerators and SCADA system	No further action is required. Improved energy efficiency was part of the technical scope of the Design Firm and is therefore incorporated into the specification for the works to be delivered by the contractor..	• National Energy Policy (2014) • The current Electricity Concessions Ordinance (AB 2013, GT no. 147) and the Electricity Concession of N.V. GEBE While there are no obligations to implement sustainable energy use in the project, the national energy policy encourages such practice. • Final Report on Environmental Standards for Sint Maarten 2025, Section 3.6, Energy Conservation	
Superficial Hydric resources	**WWTP Discharges**	During Operations	**MO4** – (see above)	(see above)	(see above)	(see above)

		During Maintenance	**MO5** – (see above)	(see above)	(see above)	(see above)
		During Design & Operations	**MO8** - Control trucks when unloading septic tanks	NRPB to ensure a suitable requirement is included in the operational guidelines prepared by the Design Firm for the WWTP Operator to assist septic truck drivers and ensuring proper discharge practices.	• Hindrance Permit (H12:006) • Nature Decree, Art. 2, Duty of Care • Nature Conservation Ordinance, Art. 8A – applicable for any operational spills reaching Fresh Pond directly. • Final Report on Environmental Standards for Sint Maarten 2025, Sections 3.3 Air & Odor, and 4 Wastewater Management	NRPB, Design Firm, WWTP Operator, VROMI
		During Operations	**MO9** - Maintain periodic monitoring of the quality of inlet and outlet water, as well as sludge, with the current frequency already ongoing.	NRPB to ensure a suitable requirement is included in the operational guidelines prepared by the Design Firm for the analysis of inlet and outlet water samples, to ensure compliance with the Hindrance Permit requirements and World Bank Group Environment Health and Safety Guidelines.	• Wastewater Ordinance • • Nature Conservation Ordinance • Nature Decree, Art. 2 Duty of Care • Nature Conservation Ordinance, Art. 8C, Biodiversity Convention obligations require monitoring of marine habitat and wetland quality. • National Ordinance Public Health • Final Report on Environmental Standards for Sint Maarten 2025, Sections 3.1 Duty of Care and 4 Wastewater Management • Beach Policy	NRPB WWTP Operator, VROMI

	Ponds discharge	During Operations	**MO10** - Maintain the period water quality monitoring of Great Bay, with the current frequency already ongoing	NRPB has procured Consultancy services for water quality testing in 6 areas at the vicinity of the WWTP. Sampling and testing will take place in June 2026, June 2027 and March 2028.	• Wastewater Ordinance • Nature Conservation Ordinance**,** Art. 8C, Sea Turtle Convention and Biodiversity Convention obligations require monitoring of marine habitat; Art. 11, Minister's responsibility for sea turtle conservation measures. • Nature Decree, Art. 2 Duty of Care • Beach Policy • National Ordinance Public Health	NRPB, Consultant, VROMI
	Sludge disposal	During Operations	**MO6** (see above)	(see above)	(see above)	(see above)
Groundwater resources	**Water quality**	During Operations	**MO4** (see above)	(see above)	(see above)	(see above)
		During Maintenance	**MO5** (see above)	(see above)	(see above)	(see above)
Noise	**Increased noise levels**	During Maintenance	**MO5 (**see above)	(see above)	(see above)	(see above)
Air quality	**Pollutant gas emissions**	During Maintenance	**MO5** (see above)	(see above)	(see above)	(see above)
		Prior to and during Operations	**MO7** (see above)	(see above)	(see above)	(see above)

	Odor emission	During Operations	**MO11** - Keep trucks tightly covered during sludge transportation.	Same as MO1	• Hindrance Permit (H12:006) • Waste Ordinance • Nature Decree, Art. 2 Duty of Care	NRPB, Design Firm, WWTP Operator, VROMI (regulatory oversight, and permit / contract management)
Waste	**Waste & Sludge production and management**	During Operations	**MO12** - Implementation of Waste Management Plan	Same as MO1, MO6 The Hindrance Permit may also require waste management practices to be followed, as well as for the WWTP Operator to keep the facility tidy and clean, including the workshop, restroom, kitchen and greenery areas.	• Waste Ordinance • Nature Decree, Art. 2 Duty of Care • Final Report on Environmental Standards for Sint Maarten 2025, Section 3.5 Efficient Waste Management • Hindrance Permit (H12:006)	NRPB, WWTP Operator, VROMI
			MO13 - Documents related to the amount of sludge sent to the licensed disposal company and related documents shall be prepared for monitoring.	_Same as MO1	• Waste Ordinance	NRPB, Design Firm, WWTP Operator, VROMI
			MO14 – Articulation between the sludge disposal location and the closure process of Pond Island landfill	Same as MO6	• Waste Ordinance	NRPB, Landfill Contractor, Landfill Engineer, WWTP Operator, VROMI

Biodiversity	**Fresh Pond Ecosystem quality**	During Maintenance	**MO1** (see above)	(see above)	(see above)	(see above)
		During Operations	**MO4** (see above)	(see above)	(see above)	(see above)
		During Maintenance	**MO5** (see above)	(see above)	(see above)	(see above)
		During Operations	**MO8** (see above)	(see above)	(see above)	(see above)
			MO9 (see above)	(see above)	(see above)	(see above)
			MO15 – Maintain bird monitoring in Fresh Pond and other IBAs, with the current frequency already ongoing	Bird monitoring is carried out by environmental NGOs active in Sint Maarten. For example, EPIC participates in the region-wide count that takes place during January 14th to February 3rd each year. All results from monitoring carried out by NGOs, such as EPIC and the Nature Foundation Sint Maarten (NF), are published publicly. The Ministry of VROMI is responsible for ensuring that any agreements with	• Nature Decree, Art. 2 Duty of Care; Art. 17, measure directly supports compliance with fauna protection obligations. • Nature Conservation Ordinance**,** Art. 8A, monitoring SPAW Annex II, bird species, directly implements SPAW obligations.	NGOs (monitoring agents), VROMI (contract manager / regulatory oversight), WWTP Operator (implementing agent for mitigation measures)

				NGOs (such as the Ministerial Administrative Decision 1362/2014 assigning NF as the scientific authority and the additional service level agreement) remain in place and layout the terms for frequency of monitoring activities and sharing of data (which is typically public). Service level agreements between NGOs and the government allows the government to engage with the NGOs like the NF at will to request their expertise on matters pertaining to local ecosystems, Additionally, VROMI maintains its role in carrying out regulatory oversight. If monitoring results determine that negative impacts or risks to biodiversity can be attributed to the operation of the WWTP, then the Operator of the WWTP would be the responsible agent for		

				developing and implementing mitigation measures, under VROMI's oversight (whether independently or in collaboration with NGOs).		
			MO16 – Maintain the landscape setting of the facilities	NRPB to ensure a suitable requirement is included in the operational guidelines prepared by the Design Firm for maintenance of the vegetation and landscape of the WWTP. The WWTP Operator is responsible for taking care of and maintaining the green areas of the facility		NRPB WWTP Operator, VROMI
	Great Bay Ecosystem quality	During Operations	**MO10** (see above)	(see above)	(see above)	(see above)
			MO17 – Maintain the aquatic communities monitoring in Great Bay, with the current frequency already ongoing	Under the Ministerial Administrative Decision 1362/2014, the NF is the assigned scientific authority, by the Ministry of VROMI, to manage the marine and terrestrial ecosystems of Sint Maarten. Coral reefs,	• Nature Conservation Ordinance**,** Art. 8C, Sea Turtle Convention and Biodiversity Convention obligations require monitoring of marine habitat; Art. 11, Minister's responsibility for sea turtle conservation measures. • Nature Decree, Art. 2 Duty of Care; Art. 17, measure protects marine fauna from indirect disturbance via discharge.	Nature Foundation Sint Maarten (Scientific Authority/ Monitoring), VROMI (contract manager / regulatory oversight), WWTP Operator (implementing agent for mitigation measures)

				seagrasses, and mangroves, as well as sea turtles and birds, form the basis of NF's monitoring programs, through a combination of regular annual monitoring and focused project-based studies. All monitoring results are usually made public and frequency is pre-determined.	• Beach Policy	
Socio-Economy and Public health	**Improved Sanitation Conditions**	During Operations	**MO8** (see above)	(see above)	(see above)	(see above)
			MO9 (see above)	(see above)	(see above)	(see above)
			MO10 (see above)	(see above)	(see above)	(see above)
			M11 (see above)	(see above)	(see above)	(see above)
	Improved Employment and Economy	Prior to and during Operations	**MO18** - Establish partnerships with local suppliers and companies in the project's areas of influence to purchase materials, goods, and services.	Same as MO1 The operational guidelines will require the WWTP Operator to develop a maintenance schedule and have all necessary materials and spare parts for its implementation.	N/A	NRPB, Design Firm, WWTP Operator, VROMI
		Prior to and during Operations	**MO19** - Implement a Recruitment and Vocational Training Plan that prioritizes the	NRPB shall ensure that the operational guidelines prepared by the Design Firm include details of the	Sint Maarten Labor Laws	NRPB, Design Firm, WWTP Operator

			inclusion of local workforce and promotes equal employment opportunities for men and women.	staffing and qualification requirements for the facility operation.		
		Prior to and during Operations	**MO20** - Implementation of Health & Safety Plan that includes work procedures as well as a regular Training Plan on workplace safety and community relations (Code of Conduct)	NRPB will ensure that the operational guidelines prepared by the Design Firm include an Occupational Health and Safety (OHS) Plan and are developed in compliance with local legislation. The plan will identify key occupational hazards and mitigate risks. Proposed measures will concern risks from noise, odour, pollution, chemicals and hazardous materials and accident response of the WWTP. NRPB will ensure that the operational guidelines also detail the expected high standards of services and proper conduct with the public required of the WWTP operator. The Ministries of VROMI and VSA	• Sint Maarten Labor Laws • Safety Ordinance • Safety Decrees I-III	NRPB, Design Firm, WWTP Operator, VSA and VROMI (regulatory oversight)

				maintain their roles in carrying out regulatory oversight.		
		Prior to and during Operations	**MO21** - Establish a Labour and a Community Grievance Redress Mechanism (GRM) within the WWTP facility	NRPB shall ensure that the operational guidelines prepared by the Design Firm include a process for receiving and resolving community and worker related complaints during operations. Complaints shall be registered and followed up by the WWTP Operator, and the Operator shall include details about complaints in its reports to VROMI.	Sint Maarten Labor Laws (in case of any labor related complaints, see applicable laws).	NRPB, Design Firm, WWTP Operator & VROMI
	Health & Safety risks	Prior to and during Operations	**MO21** – (see above) **MO22** - Implement a public health advisory system for the overflows of the Great Bay, whenever needed (based on water quality monitoring	NRPB will support and advise VROMI for strengthening the existing public health advisory system as per international best practices: ○ Issue alerts immediately after overflow events, warning that water	National Ordinance Public Health	NRPB, VROMI & VSA

			and/or precautionary measure)	quality at Great Bay beaches may not meet recreational standards; ○ Post signage at beach access points and update official websites and social media platforms; ○ Recommended advisory duration: 48 to 72 hours, based on WHO[2]; ○ Provide clear messaging on risks (e.g., gastrointestinal illness, skin infections) and precautions (avoid swimming, especially for children and immuno-compromised individuals).		
	Communication	Prior and during operations	**MO21** (see above)	(see above)	(see above)	(see above)

[2] World Health Organization (WHO) – Guidelines for Safe Recreational Water Environments

Table 3 – Environmental & Social Mitigation Measures: Cumulative Impacts in the Operational Phase

As an extension to Table 2, the following Table 3 addresses the mitigation measures applicable to cumulative impacts arising during the operational phase as a result of the expansion of the sewer network in the Greater Cul-de-Sac area. Unlike the impacts addressed in Tables 1 and 2, which are directly attributable to the WWTP rehabilitation and upgrade works, the impacts in this table result from the interaction between the upgraded WWTP and the increased volumes of wastewater it will receive following sewer network expansion. These impacts must therefore be understood and managed in the context of both projects together, rather than in isolation.

The primary cumulative impacts identified relate to increased effluent discharge volumes into Fresh Pond and the associated effects on water quality, nutrient loading, and microbial contamination in that ecosystem. While the ESIA concludes that these increases are not expected to result in significant changes relative to current baseline conditions, this conclusion is contingent on the consistent implementation of the measures set out in this table. Failure to implement these measures could result in cumulative impacts of greater significance than those assessed.

Given these measures are required to be implemented during the operation of the WWTP, responsibility for implementation and monitoring of these measures is as set out in Table 2.

Environmental / Social Impact	Mitigation Measures
See Section 7, ESIA	See Section 8, ESIA

Thematic Area	Impact	*(see Table 2 for detailed description)*
Soil	Soil contamination	MO6
Superficial Hydric resources	WWTP Discharges	MO2; MO4; MO5; MO8; MO9
	Ponds discharge	MO10
	Sludge disposal	MO6
Air quality	Pollutant gas emissions	MO5; MO7; MO11
	Odor emission	MO12; MO13
Waste	Sludge production	MO14
Biodiversity	Fresh Pond Ecosystem quality	MO15; MO16
	Great Bay Ecosystem quality	MO17
Socio-Economy and Public health	Improved Sanitation Conditions	MO8; MO9; MO10; MO11; MO20; MO21
	Health & Safety risks	MO22

Annexes

Annex 1 - Contractors' Reporting Template

Environmental, Social, Health & Safety Monthly Report Template

Cover Page

- Project Title
- Contractor's/Company's Name, Contact Information, Address
- Site Location
- Reporting Period
- Date of Report
- ESHS manager name

Table of Contents

Include a table of contents

Project Progress Status

Brief Description of Project Progress Status for the reporting period

Accidents and Incidents

Provide a summary of all accidents/incidents reported during reporting period (and for previous periods in case still relevant)

Date of Incident/Accident/Non-Compliance	Description	Results (Injuries. Fatalities, Treatment)	Current Status/Update

Inspection Schedule

(List ESHS site inspection dates of current and coming month)

Site Description	Date	Date	Date	Date	Date	Date	Date	Date
ESHS Inspector Name								

GRM

Workers and community complaints and actions

Date of Lodging of Complaint	Site/Location of Complaint and Person Receiving	Nature of Complaint (Brief Description)	Action Taken to Resolve the complaint. If not resolved, state current status of the complaint, including follow-up actions

Training Overview

Provide an overview of trainings and toolbox discussions provided during the reporting period.

Training Topic	**Date**	**Location**	**hrs**	**Instructor**	**Participants**	**% of Workers**
PPE use						
Working on excavations						
Electrical safety						
Solid waste						
Wastewater, fuel, paints/solvents						

Fire safety						
Code of Conduct and SEA/SH						
GRM						

(Please adjust according to type of training carried out)

Toolbox Topic	**Date**	**Location**	**min**	**Instructor**	**Participants**	**% of Workers**
Slips, trips and falls						
Work at height, use of ladders and scaffolding						
Work near existing services						
Manual handling						
Electrical hazards						
Working in confined spaces						
Falling objects						
Fire safety						
Traffic safety						
Construction plant, equipment and tools						
Excavation						
Hazardous materials						

Eye protection, head protection, hearing protection						
Materials storage						
Behaviour in accordance with the CoC						
…………						

(Please adjust according to subject of toolbox talks carried out)

Future Actions

Describe lessons learned, coming month initiatives for improvement.

Non-Conformances

Date	Site	Inspector	Description of Non-conformance	Corrective actions	Date of Implementation & Responsibility	ESHS ID

ESHS ID

1. PPE's use and signage.
3. Working on Heights (scaffolding, ladders, harnesses, lanyards, etc)
4. Community health & safety (Security fencing and signage, noise, safe pedestrian walkways, no road obstructions, traffic signs, etc)
5. Occupational health & safety (toilet, washing station, resting room, drinking water, first aid kit, emergency phone numbers, valid fire
6. extinguisher, etc)
6. Solid waste management, including dust prevention and a tide jobsite (skips, bins, tarps, recycling, etc)
7. Wastewater management
8. Hazardous materials. Mold management. Asbestos management. Fuels, paints, thinners, etc, storage & disposal.
9. Electrical hazards
10. Code Of Conduct violation, GRM/SEA/SH management, Accidents or Incidents reporting
11. Plans, Files and Records (C-ESMP reporting/updates, Permits/Licenses, Vehicles motor test/maintenance, training records, etc)

Metrics

Men Hours		Environmental Incidents		H&S Accidents		Near misses		Medical Leave days[1]		ESHS Meetings		ESHS Inspections		ESHS Manager hrs	
Current month	To date	Current month	To date	Current month	To date	Current month	To date	Current month	To date	Current month	To date	Current month	To date	Current month	To date
Non-Conformances (NCs)		**Open NCs**		**Closed NCs**		**Stop Work Exercised**		**Warnings Given**		**Workers Removed from Site**		**CoC Violations**		**Grievances Submitted**	
Current month	To date	Current month	To date	Current month	To date	Current month	To date	Current month	To date	Current month	To date	Current month	To date	Current month	To date
Grievances Resolved		**Waste Produced**		**Waste Recycled**											
Current month	To date	Current month	To date	Current month											

1. Caused by accident or occupational illness

Non-Conformances Statistics

ESHS ID	Explanation	Non-Conformances (Current Month)		Non-Conformances (Up to Date)	
		Total	Open	Total	Open
1	PPE's use and signage.				
2	Working on Heights (scaffolding, ladders, harnesses, lanyards, etc)				
3	Community health & safety (Security fencing and signage, noise, safe pedestrian walkways, no road obstructions, traffic signs, etc)				
4	Occupational health & safety (toilet, washing station, resting room, drinking water, first aid kit, emergency phone numbers, valid fire extinguisher, etc)				

	5 Solid waste management, including dust prevention and a tide jobsite (skips, bins, tarps, recycling, etc)		
	6 Wastewater management		
	7 Hazardous materials. Mold management. Asbestos management. Fuels, paints, thinners, etc, storage & disposal.		
	8 Electrical hazards		
	9 Code Of Conduct violation, GRM/GBV management, Accidents or Incidents reporting		
	1 Plans, Files and Records (C-ESMP reporting/updates, Permits/Licenses, Vehicles motor test/maintenance, training records, etc)		

Status of Contractor’s Documentation

Minimum Records to keep

- Updated MSIPs or CESMP
- Permits and licenses as applicable to the project
- Accidents and Incidents
- Non-conformances and corrective actions database
- GRM records
- Employees work permits
- Signed Code of Conduct by all workers
- Training records (training dates, training place, name of instructor, training duration, name of participants, signatures of participants)
- Toolbox briefings (training dates, training place, name of instructor, training duration, name of participants, signatures of participants)
- Warnings given and workers removed from site
- Driver’s licenses
- Vehicles motor test records
- Equipment maintenance records

Mitigation Measures Implementation & Performance

(Note: Contractor should include photographs to record onsite mitigation activities as applicable.)

(Minimum mitigation measures are described below. Contractor to further elaborate based on contract requirements)

Monitoring Parameter/Activity	Percentage or Score	Comments
Jobsite General		

Monitoring Parameter/Activity	Percentage or Score	Comments
1. Clean and tide jobsite		
2. Posters and safety signs in place		
3. Emergency phone numbers posted		
4. Signing booth in place and used		
Community Safety		
5. Barriers to prevent unauthorized access and fall in risks		
6. Safe pedestrian walkways		
7. No Obstruction on roads and sidewalks		
8. Traffic signs are placed wherever required		
9. Noise monitoring devices are used		
Work Hazards & Occupational Health		
10. Personal Protective Equipment (hard hats, goggles, dust masks, boots, gloves, hearing protection)		
11. Access of trenches deeper than 1.2m		
12. Falling protection		
13. Stable surface for ladders		
14. Power tools safety (guards, spring-loaded switch on)		
15. First Aid kit		
16. Access to areas for rest (canteen)		
17. Hygiene facilities		
18. Drinking water supply		
Solid Waste		
19. Sufficient waste bins/skips in place		
20. Rain and wind protection		
21. Segregate materials for recycling		
22. Waste chain of custody records		
Dust		
23. Covered loose material stockpiles, waste skips and trucks		
24. Watering for dust prevention		
Wastewater		
25. Collection, storage and disposal in authorized facility		
26. Silt stormwater runoff		
Hazardous Materials		
27. Stored inside covered premises and on impermeable surface		
28. Use of secondary spill containment equipment		
29. Spill Kit and Availability of absorption materials		
30. Safe storage of used oils and paint buckets		
Fire & Electrical Safety		
31. Fire extinguishers number and type according to Fire Safety Plan		
32. Flammable materials (fuel, waste, etc) are safely stored		
33. Flashback arrestors		
34. Electrical equipment shall be in good working condition.		
35. Electrical equipment is protected from weather		
Files, Plans & Records		
36. Non-Conformances are logged		
37. Monthly Reports are submitted		
38. Workers are properly trained, including the Induction training before mobilization to site and regular toolbox talks.		
39. C-ESMP updates		
40. Equipment/Vehicles maintenance records		
41. Safety Checklists		

Monitoring Parameter/Activity	Percentage or Score	Comments
42. Incidents & Accidents		
43. Complaints records (resolved and pending)		

Annex 2 - Incidents and Accidents Reporting & Forms

2.1. Incidents & Accidents Reporting

2.1.1. Contractor Responsibilities

Despite significant efforts to manage environmental and social risks associated with project activities, incidents may occur. Contractors must have a written/documented procedure for the managing of incidents and accidents related to the project. The incident management and reporting process may comprise below steps.

- ✓ Step 1 Initial Communication – notify the relevant authorities, Supervisor and NRPB
- ✓ Step 2 Classification – identify how serious is the incident
- ✓ Step 3 Investigation – conduct root cause analysis (RCA) and identify necessary set of measures to as appropriate to address the root causes (aka corrective action plan (CAP))
- ✓ Step 5 Response – implement corrective actions
- ✓ Step 6 Follow Up – completion of corrective actions and develop necessary preventive actions to prevent similar incidents occurring in the future

Contractor shall report any accidents/incidents to the NRPB in writing within 24 hours after the incident, and immediately after the occurrence via email. Incidents/accidents to be reported include, but are not limited to, the following:

1. Inspection, investigation by, or warning or official order from, government regarding a (possible) violated policy, permit or legislation or permit conditions, as per the ESMP;
2. Any work-related fatality;
3. Accidents requiring medical treatment, in case of hospital admittance, in case of medical leave days, in case of permanent complete or partial invalidity of an employee, fractured or cracked bones or teeth, punctured eardrums or hearing loss;
4. Near miss events, which are legally required to be reported by the Contractor to the Labor Department immediately, no later than three days; following the NATIONAL REGULATIONS containing (general) measures (provisions) for the security of work in enterprises (overheid.nl).
5. A significant environmental incident as a consequence of which major pollution (air, water, noise, or land) or a significant adverse environmental impact (wildlife or local habitat) has occurred, is occurring, or is likely to occur;
6. Reported Code of Conduct violations in regard to human rights, discrimination against workers, drugs or other illegal activities, fraud & corruption, and conflict of interest;
7. Significant adverse effects or damage to private property (e.g., vehicle accident, damage from flying rock, working beyond the boundary);
8. Discovery and/or damage to cultural heritage, artifacts, monuments, sacred grounds, etc.;
9. Significant encroachment on private property
10. Displacement Without Due Process: The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the

provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.

11. Burglary or theft of assets
12. Any confirmed Covid-19 case, or other infectious disease
13. Indication or incidents of child labor, forced labor or undocumented workers.
14. Sexual Orientation and Gender Identity (SOGI) related violence or discrimination incidents.
15. Any indication of gender-based violence (GBV), sexual exploitation or abuse, sexual harassment or sexual misbehavior, rape, sexual assault, child abuse, or defilement, or other violations involving children.
16. Acts of Violence/Protest: Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.

The initial report from Contractor shall address the following questions.

- What was the incident? What happened? To what or to whom?
- Where and when did the incident occur?
- What is the information source? How did you find out about the incident?
- Are the basic facts of the incident clear and uncontested, or are there conflicting versions?
- What were the conditions or circumstances under which the incident occurred?
- Is the incident still ongoing or is it contained?
- Is the loss of life or severe harm involved?
- How serious was the incident? How is it being addressed?

For the initial report, depending on the nature of incident/accident, the Contractor shall use the reporting forms attached in this Annex .

After the initial written reporting, the Contractor shall undertake an investigation and a root cause analysis and propose appropriate measures to avoid future incidents. A detailed report shall be submitted in writing, for NRPB's approval, within 3 days. After the Contractor's initial reporting on the root cause analysis (RCA) and corrective action plan (CAP), the Contactor should also report the completion of corrective actions and possible preventive actions. In case of a GBV incident, the Contractor follows the instructions from the NRPB.

A root-cause analysis of an incident reports the sequence of events and factual circumstances. The analysis identifies what failing(s) led to the accident, what safety measures were in place, and the risk information/training provided to workers on site. The level of supervision of unskilled labor should also be assessed. A root-cause incident investigation report for the accident, including corrective measures is expected to improve OHS conditions at the given site.

For the root cause analysis and Corrective Action Plan, depending on the nature of incident/accident, the Contractor shall use the reporting forms attached in this Annex.

2.1.2. NRPB Responsibilities

NRPB shall promptly notify the World Bank, within 72 hours after learning of the incident or accident, of any incident or accident related to or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, in accordance with the ESCP, the instruments referenced therein and the Environmental and Social Standards. The Incident Forms Part B (see Annex 2.2) template will be used for reporting according to the incident category.

The following are incident types to be reported using the environmental and social incident response process:

i. **Fatality**: Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins).

ii. **Lost Time Injury**: Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring 3 or more days off work, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.

iii. **Acts of Violence/Protest**: Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.

iv. **Disease Outbreaks**: The occurrence of a disease in excess of normal expectancy of number of cases. Disease may be communicable or may be the result of unknown etiology.

v. **Displacement Without Due Process:** The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.

vi. **Child Labor:** An incident of child labor occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (iii) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

vii. **Forced Labor**: An incident of forced labor occurs when any work or service not voluntarily performed is exacted from an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This also includes incidents when trafficked persons are employed in connection with a project.

viii. **Unexpected Impacts on heritage resources**: An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or nationally protected areas not foreseen or predicted as part of project design or the environmental or social assessment.

ix. **Unexpected impacts on biodiversity resources**: An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species.

x. **Environmental pollution incident**: Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24 hrs or have resulted in harm to the environment.
xi. **SEA/SH**: Sexual Exploitation: Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes. Sexual Abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
xii. **SOGI**: Violence on the basis of SOGI or Discrimination on the basis of SOGI.
xiii. **Other**: Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm had occurred on that occasion. Any repeated non-compliance or recurrent minor incidents which suggest systematic failures that the task team deems needing the attention of Bank management.

A subsequent report after investigation will be submitted to the Bank in a timeframe acceptable to the Bank. The report will include a description of such Significant Event, and the measures, if any, that the Recipient is taking or plans to take to address such Significant Event and to prevent any future similar event. In case the accident resulted in fatality/injury for worker or member of the public, then the accident Form Part C (Annex 2.2) template will be used for reporting. In case of SEA/SH and SOGI incidents then the corresponding Part C forms shall be used (also in Annex 2.2).

The description of the Event shall address the following questions (if possible and relevant).

- What was the incident? What happened? To what or to whom?
- Where and when did the incident occur?
- What is the information source? How did you find out about the incident?
- Are the basic facts of the incident clear and uncontested, or are there conflicting versions?
- What were the conditions or circumstances under which the incident occurred?
- Is the incident still ongoing or is it contained?
- Is the loss of life or severe harm involved?
- How serious was the incident? How is it being addressed?

The report will contain a Root Cause Analysis (RCA), highlighting the reasons that lead into this incident. The Event description and RCA analysis will be shared with the World Bank preferably within 10 days after the occurrence of the Event. The RCA will be discussed with the Bank and agreements will be made on the corrective actions.

NRPB will prepare a Corrective Action Plan which will describe the set of measures (short, medium, long term), responsibilities and timelines for implementation, as appropriate to address the root causes to help prevent any recurrence of the incident and discuss this plan with the Bank. The Corrective Action Plan should be based around a summary table, with additional supporting text and information to adequately describe the measures and how they will achieve the corrective actions to address the immediate, underlying, and root causes identified in the investigation report. The Corrective Action Plan template found under Annex 2.2 should be used.

NRPB will keep the World Bank informed of the on-going implementation of the said measures and plans.

Incidents that do not require immediate WB reporting (based on requirement) will be still included in the semi-annual project reports, in agreement with NRPB.

2.2 Reporting Forms

Part B: To be completed within 24 hours

B1: Incident Details			
Date of Incident:	**Time:**	**Date Reported to PIU:**	**Date Reported to WB:**
Reported to PIU by:	**Reported to WB by**:	**Notification Type**: Email/'phone call/media notice/other	
Full Name of Main Contractor:		**Full Name of Subcontractor**:	

B2: Type of incident (please check all that apply)[1]
Fatality ☐ Lost Time Injury ☐ Displacement Without Due Process ☐ Child Labor ☐ Acts of Violence/Protest ☐ Disease Outbreaks ☐ Forced Labor ☐ Unexpected Impacts on heritage resources ☐ Unexpected impacts on biodiversity resources ☐ Environmental pollution incident ☐ Dam failure ☐ Other ☐

[1]See Annex 1 for definitions

B3: Description/Narrative of Incident
Please replace text in italics with brief description, noting for example: I. *What is the incident?* II. *What were the conditions or circumstances under which the incident occurred (if known)?* III. *Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions?* IV. *Is the incident still ongoing or is it contained?* V. *Have any relevant authorities been informed?*

B4: Actions taken to contain the incident			
Short Description of Action	**Responsible Party**	**Expected Date**	**Status**

For incidents involving a contractor:
Have the works been suspended (for example, under GCC8.9 of Works Contract)? Yes ☐; No ☐;
Trading name of Contractor (if different from B1):

Please attach a copy of the instruction suspending the works.

B5: What support has been provided to affected people

Annex 1: Incident Types

The following are incident types to be reported using the environmental and social incident response process:

Fatality: Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins).

Lost Time Injury: Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring 3 or more days off work, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.

Acts of Violence/Protest: Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.

Disease Outbreaks: The occurrence of a disease in excess of normal expectancy of number of cases. Disease may be communicable or may be the result of unknown etiology.

Displacement Without Due Process: The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.

Child Labor: An incident of child labor occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (i) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

Forced Labor: An incident of forced labor occurs when any work or service not voluntarily performed is exacted from an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This also includes incidents when trafficked persons are employed in connection with a project.

Unexpected Impacts on heritage resources: An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or nationally protected areas not foreseen or predicted as part of project design or the environmental or social assessment.

Unexpected impacts on biodiversity resources: An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species.

Environmental pollution incident: Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24 hrs or have resulted in harm to the environment.

Dam failure: A sudden, rapid, and uncontrolled release of impounded water or material through overtopping or breakthrough of dam structures.

Other: Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm had occurred on that occasion. Any repeated non-compliance or recurrent minor incidents which suggest systematic failures that the task team deems needing the attention of Bank management.

Part C: To be completed following investigation

C1: Investigation Findings
Please replace text in italics with findings, noting for example: I. *where and when the incident took place,* II. *who was involved, and how many people/households were affected,* III. *what happened and what conditions and actions influenced the incident,* IV. *what were the expected working procedures and were they followed,* V. *did the organization or arrangement of the work influence the incident,* VI. *were there adequate training/competent persons for the job, and was necessary and suitable equipment available,* VII. *what were the underlying causes; where there any absent risk control measures or any system failures,*

C2: Corrective Actions from the investigation to be implemented (To be fully described in Corrective Action Plan)		
Action	**Responsible Party**	**Expected Date**

Part C cont.: To be completed following investigation

C3a: Fatality/Lost time Injury information

Immediate cause of fatality/injury for worker or member of the public (please check all that apply) [2]:

1. Caught in or between objects ☐ 2. Struck by falling objects ☐ 3. Stepping on, striking against, or struck by objects ☐ 4. Drowning ☐ 5. Chemical, biochemical, material exposure ☐ 6. Falls, trips, slips ☐ 7. Fire & explosion ☐ 8. Electrocution ☐ 9. Homicide ☐ 10. Medical Issue ☐ 11. Suicide ☐ 12. Others ☐

***Vehicle Traffic:* 13. Project Vehicle Work Travel ☐ 14. Non-project Vehicle Work Travel ☐**

15. Project Vehicle Commuting ☐ 16. Non-project Vehicle Commuting ☐ 17.Vehicle Traffic Accident (Members of Public Only) ☐

Name	Age/DOB	Date of Death/Injury	Gender	Nationality	Cause of Fatality/Injury	Worker (Employer)/Public

[2]See Annex 2 for definitions

C3b: Financial Support/Compensation Types (To be fully described in Corrective Action Plan template)

1. Contractor Direct ☐ 2. Contractor Insurance ☐ 3. Workman's Compensation/National Insurance ☐

4. Court Determined Judicial Process ☐ 5. Other ☐ 6. No Compensation Required ☐

Name	Compensation Type	Amount (US$)	Responsible Party

C4: Supplementary Narrative

Annex 2: Definition of fatality/injury immediate causes

1. **Caught in or between objects:** caught in an object; caught between a stationary object and moving object; caught between moving objects (except flying or falling objects).
2. **Struck by falling objects:** slides and cave-ins (earth, rocks, stones, snow, etc.); collapse (buildings, walls, scaffolds, ladders, etc.); struck by falling objects during handling; struck by falling objects.
3. **Stepping on, striking against, or struck by objects:** stepping on objects; striking against stationary objects (except impacts due to a previous fall); Striking against moving objects; Struck by moving objects (including flying fragments and particles) excluding falling objects.
4. **Drowning:** respiratory impartment from submersion/emersion in liquid.
5. **Chemical, biochemical, material exposure:** exposure to or contact with harmful substances or radiations.
6. **Falls, trips, slips:** falls of persons from heights (e.g., trees, buildings, scaffolds, ladders, etc.) and into depths (e.g., wells, ditches, excavations, holes, etc.) or falls of persons on the same level.
7. **Fire & explosion:** exposure to or contact with fires or explosions.
8. **Electrocution:** exposure to or contact with electric current.
9. **Homicide:** a killing of one human being by another.
10. **Medical Issue:** a bodily disorder or chronic disease.
11. **Suicide:** the act or an instance of taking, or attempting to take, one's own life voluntarily and intentionally.
12. **Others:** any other cause that resulted in a fatality or injury to workers or members of the public.

Vehicle Traffic

13. **Project Vehicle Work Travel:** traffic accidents in which project workers, using project vehicles, are involved during working hours and which occur in the course of paid work.
14. **Non-project Vehicle Work Travel:** traffic accidents in which project workers, using non-project vehicles, are involved during working hours and which occur in the course of paid work.
15. **Project Vehicle Commuting:** traffic accidents in which project workers, using project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.
16. **Non-project Vehicle Commuting:** traffic accidents in which project workers, using non-project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.
17. **Vehicle Traffic Accident (Members of Public Only):** traffic accidents in which non-project workers/members of the public are involved in an accident while travelling for any purpose.

Part B: To be completed within 24 hours - SEA/SH

B1: Incident Details		
Date of incident intake by the project/GM:	**Date Reported to PIU:**	**Date Reported to WBG:**
Reported to project/GM by: ☐ Survivor ☐ Third party ☐ Other: ________ **Is a record of this incident in GM?** Yes ☐ No ☐	**Reported to PIU by:** ☐ GM operator ☐ Directly, by Survivor ☐ Directly, by third party ☐ Other: ________	**Reported to WBG by:** ☐ PIU ☐ Directly, by Survivor ☐ Directly, by third party ☐ Other: ________

B2: Incident type (please check all that apply) See Appendix 1 for definitions
Sexual exploitation ☐ **Sexual abuse** ☐ **Sexual harassment** ☐

B3: Provide the following details from the GM record	
Age of survivor (if recorded in GM):	Have the national legislation or mandatory reporting requirements been followed? Yes ☐ No ☐
Sex of survivor (if recorded in GM): Male ☐ Female ☐ Other ☐	Was the survivor referred to service provision?[3] Yes ☐ No ☐
Is the survivor employed by the project (as indicated by the survivor or complainant and reported in the GM)? Yes ☐ No ☐	Is the alleged perpetrator employed by the project (as indicated by the survivor or complainant and reported in the GM)? Yes ☐ No ☐

B4: Basis for further action	
a. Has the complainant provided informed consent to lodge a formal complaint? Yes ☐ No ☐	c. Has the survivor provided informed consent to be part of an investigation into misconduct? Yes ☐ No ☐
b. Does the employer have a suitable administrative process and capacity in place to investigate misconduct relating to SEA/SH in a survivor-centered way? Yes ☐ No ☐	d. Has the complaint been filed anonymously or through a third party? Yes ☐ No ☐
If the answer to any of these questions is no, has the GM assessed the risks and benefits of carrying out an investigation into the alleged misconduct, taking into account the survivor's safety and wellbeing? Yes ☐ No ☐	
Will an investigation into misconduct be undertaken in addition to an investigation into adequacy of project systems, processes or procedures? Yes ☐ No ☐	

[3] When a complaint is filed by a third party, or the survivor has not reached out to the project, the project may not be able to confirm this information. In these cases, it may not be advisable for the project GM to attempt to reach the survivor, as this may jeopardize confidentiality, safety, and agency. Projects may attempt to find safe ways to pass information indirectly (such as through broad efforts to inform) about services available.

Appendix 1: Incident Types

Incident Type	Example
Sexual Exploitation: Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from a Bank financed Goods, Works, Non-consulting Services or Consulting Services is used to extract sexual gain.	• A community member is promised employment on the World Bank financed project site in exchange for sex • A member of the project team connecting water lines to homes requests a sexual favor for access to water connection • A project worker denies passage of a woman through the worksite unless she performs a sexual favor
Sexual Abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. In Bank financed operations/projects, sexual abuse occurs when a project related worker (contractor staff, subcontractor staff, supervising engineer) uses force or unequal power vis a vis a community member or colleague to perpetrate or threat to perpetrate an unwanted sexual act.	• A project worker abuses a community member • A project worker has a sexual relationship with a child • A project worker befriends a child, supporting her and/or her family in exchange of sexual favors • A project worker stays in the cafeteria after dinner and sexually assaults a kitchen staff member • A project worker touches an administrative staff member’s body. • A supervisor for a subcontractor asks his female colleague to join him for a business dinner with the main contractor. After dinner he asks her to entertain “the boss” in his room as an appreciation for the contract and her work.
Sexual Harassment: Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment. In Bank financed operations/projects, sexual harassment occurs within the context of a subcontractor or contractor and relates to employees of the company experiencing unwelcome sexual advances or requests for sexual favor or acts of a sexual nature that are offensive and humiliating among the same company’s employees.	• A worker sends sexually explicit text messages to a coworker • A colleague leaves an offensive picture that is sexually explicit on a co-worker’s desk • A project worker asks all female employees to great him with a kiss on the cheek every day before work. • A project worker compliments his co-worker’s body. • A project worker continuously invites a co-worker out for drinks or dinner after being told that they are not interested.

Part C: To be completed following investigation – SEA/SH

C1: Findings of the investigation		
Have sanctions against a perpetrator been recommended as part of an investigation into misconduct? Yes ☐ No ☐	Has an investigation into adequacy of project systems, processes or procedures been undertaken? Yes ☐ No ☐	
C2: Corrective actions to be implemented (To be fully described in Corrective Action Plan)		
Short Description of Action (SEA/SH examples)	**Responsible Party**	**Timeline for completion/Status**
Referral of Survivor to holistic care services		
Undertake disciplinary investigation in accordance with GM timelines and confirmed process		
Disciplinary actions, including sanctions, to be applied following misconduct investigation by Employer		
Increased training on Codes of Conduct (CoC)		
Audit of implementation of SEA/SH safety mitigation		
Strengthened awareness training on project-related risks, CoC and how to report incidents for project-affected community		
Training for project supervisors on the need to follow guidelines of behaviour in CoC and their supervisory responsibilities		
Plan to improve coverage/quality of service provision		
Any other system strengthening measures or corrections for system failures that are necessary		

C3: For incidents involving a Contractor:
Has the incident been referred to the DAAB? Yes ☐ No ☐

Part B: To be completed within 24 hours - SOGI

B1: Incident Details		
Date of incident intake by the project/GM:	**Date Reported to PIU:**	**Date Reported to WBG:**
Reported to project/GM by: ☐ Victim[1] ☐ Third party ☐ Other: ________	**Reported to PIU by:** ☐ GM operator ☐ Directly, by victim[1] ☐ Directly, by third party ☐ Other: _______	**Reported to WBG by:** ☐ PIU ☐ Directly, by victim[1] ☐ Directly, by third party ☐ Other: _______

1. If reporting is by victim care must be taken to adhere to any requests for anonymity.

B2: Incident type requiring confidentiality (please check all that apply)
Violence on basis of SOGI ☐ **Discrimination on basis of SOGI** ☐ See Appendix 1 for definitions

B3: Basis for further reporting		
a. Has the victim provided informed consent for this incident to be reported? Yes ☐ No ☐	b. Does national legislation or mandatory reporting apply to this case? Yes ☐ No ☐ c. If yes, has it been reported? Yes ☐ No ☐	
If the answer to both a. & b. questions is NO, further reporting of this allegation is not required. However, further measures to strengthen SOGI prevention and mitigation on the project should be provided below.		
Further measures to strengthen SOGI prevention and mitigation		
Short Description of Action (*Examples: Please replace text in italics below with brief description of actions to be taken*)	**Responsible Party**	**Expected Date**
Increased training on Codes of Conduct (CoC) and non-discrimination on the basis of SOGI		
Safety audit of project site focussing on SOGI		
Verification all employees sign and understand CoC		
Strengthened awareness on project-related risks, CoC and how to report incidents for project-affected community		
Active outreach to local civil society organisations working with social and gender minorities to ensure continuous risk monitoring and adaptation		
Training for project supervisors on the need to follow guidelines of behaviour in CoC and their supervisory responsibilities		
Plan to improve coverage/quality of service provision		

Additional training for GM focal points		
Other (please detail)		

B4: If consent has been provided or national legislation mandates reporting of the incident as indicated in B3, provide the following details from the available GM record	
Age of victim (if recorded in GM):	
Sex of victim (as recorded in GM):	Male ☐ Female ☐ Other ☐
Has the victim self-identified as sexual or gender minority or are there indications that the case is related to SOGI (i.e., use of homo- or transphobic language)?	Yes ☐ No ☐
Was the victim referred to service provision?	Yes ☐ No ☐
Is the alleged perpetrator employed by the project (as indicated by the victim and reported in the GM)?	Yes ☐ No ☐

B5: Basis for investigation	
Has the victim provided informed consent for this incident to be investigated?	Yes ☐ No ☐
If the answer to this question is yes, complete part C below using the results of the investigation	

Appendix 1: Incident Types

Violence on the basis of SOGI:

The threat or use of physical force that injures or abuses a person, or damages or destroys property, and that is motivated in whole or in part by the victim's real or perceived sexual orientation, gender identity, gender expression, or sex characteristics.

Discrimination on the basis of SOGI:

Discrimination means creating a distinction, exclusion, or restriction which has the purpose or effect of impairing or excluding a person based on their real or perceived sexual orientation, gender identity, gender expression, or sex characteristics from being on an equal basis with others.

Part C: To be completed following investigation where further reporting is permitted (see Incident Form SOGI Part B)

C1: Corrective actions from the investigation to be implemented (to be fully described in Corrective Action Plan)		
Short Description of Action (*Examples: please replace text in italics below with brief description of actions to be taken*)	**Responsible Party**	**Expected Date**
Referral of victim to holistic care services		
Disciplinary actions, including sanctions, to be applied following misconduct investigation		
Measures to prevent similar instances from happening in the future		
Measures to address gaps in procedural manuals or implementation of procedures that contributed		
Measures to change/modify program practices to prevent recurrence		
Where additional training might be needed		