



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

Date Prepared/Updated: 12/06/2019 | Report No: ESRSA00372



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
St Maarten	LATIN AMERICA AND CARIBBEAN	P172619	
Project Name	Sint Maarten Irma Red Cross Roof Repair Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Urban, Resilience and Land	Investment Project Financing		11/26/2019
Borrower(s)	Implementing Agency(ies)		
Netherlands Red Cross	Netherlands Red Cross		

Proposed Development Objective(s)

The development objective is to repair roofs up to a safe standard for vulnerable households affected by Hurricane Irma.

Public Disclosure

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>3.62</b>

**B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

**C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]**

Hurricane Irma hit the Caribbean in Sept. 2017 with an intensity rarely seen in the region. One of the strongest storms on record, the Category 5 hurricane was particularly devastating in its impact on small island states like Sint Maarten.



More than two years after Hurricane Irma struck, many households are still feeling the impacts of the hurricane season, and many roofs remain unrepaired. In particular, vulnerable households that lack access to resources are struggling to repair and rebuild by themselves.

The Dutch government has made funds available for the recovery of the island, channeled through a World Bank Trust Fund. An application from the Red Cross on additional funds for roof repair activities was approved during the Steering Committee of the Trust Fund on 16 July 2019. The aim of the NLRC Roof Repair Project is to complement efforts being undertaken by the Government of Sint Maarten under the World Bank-financed Emergency Recovery Project, specifically the roof repair component. The Government's roof repair program focuses on houses that need substantial repair work, both for roofs and the building structure. The NLRC Roof Repair Project will focus on those houses that need only roof repairs, without needing any structural repairs, and target beneficiaries that are not part of the Government's house repair program. The NLRC itself will be the main implementing agency for the project.

The NLRC aims to repair an estimated 200 damaged house roofs from areas that were outside the initial project focus areas. NLRC-employed and supervised construction crews will repair the roofs to ensure faster and higher quality repairs than those realized under the homeowner-driven Phase 1 of the project. The construction crews are using an updated version of the reconstruction guidelines that are based on those originally developed by the NLRC in collaboration with a local engineering firm (ICE) and the Ministry of Public Housing, Spatial Planning, Environment and Infrastructure (VROMI).

This proposed project can be seen as an extension of an existing NLRC roof repair project, integrating a number of key lessons learned, a detailed and tested project approach and established reconstruction technical guidelines. Furthermore, NLRC has an experienced team on the ground able to continue with roof repairs. The NLRC is the implementing agency for all components of the project.

#### **D. Environmental and Social Overview**

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]  
Sint Maarten is a high-income constituent country of the Kingdom of the Netherlands in the Caribbean. It is the most densely populated country in the Caribbean with a population of roughly 38,000 in an area of 34 square km and a per capita Gross Domestic Product (GDP) of U\$25,381. In addition to the 38,000 registered inhabitants, there is a significant group of unregistered migrants, estimated to be between 10,000 and 15,000 people.

Hurricane Irma severely damaged the economy of the country. Sint Maarten's unemployment rate (6.2 percent) and youth unemployment rate (23.8 percent) in 2017 significantly rose following the hurricane due to the shutting down of tourism businesses.

The Netherlands Red Cross (NLRC) Roof Repair project aims to ensure 200 households affected by hurricane Irma have safe roofs at the end of the project, and households have increased knowledge on hurricane resistant housing mainly focusing on roof repairs. The proposed grant will complement the Netherlands Red Cross (NLRC)'s 1,000 homes-repair program. The identification of specific sites where the works will be implemented will be defined during project implementation. However, based on the experience of NLRC to date, the project will target areas where most households live in some degree of poverty, with lack of means to repair their homes. Certain areas are characterized by fragmented communities due migrant flows and cultural and linguistic backgrounds. Most poorer



areas are also characterized by the remaining presence of debris caused by damages as a result of hurricane Irma in 2017.

According to NLRC the project will be implemented in 12 months with an expected project start date of December 2019. To implement the project, NLRC will identify communities and individual beneficiaries based on a door-to-door approach following a mapping assessment of visual damage that NLRC crews will carry out. NLRC technical staff will draft bill of quantities, detailing the required types and amounts of construction materials for each roof to be repaired. Beneficiaries will receive a technical workshop on hurricane resistant construction techniques to enhance their knowledge, allowing them to recognize the work being done, and raising awareness on the importance of maintenance. Other awareness messages on hazardous living conditions (mold, asbestos, vectors) and disaster risk reduction messages will be incorporated in community awareness workshops. NLRC construction crews will then detail a repair plan and time schedule for repairs and coordinate with designated hardware stores for the delivery of repair materials. NLRC construction crews then will proceed with the actual repairs. The Site Supervisor and construction coordinators will carry out quality monitoring on regular basis during the works, as well as at the end of the repairs.

**D. 2. Borrower’s Institutional Capacity**

The Home Repair project is part of the Netherlands Red Cross (NLRC) recovery programme on Sint Maarten. While this project will be NLRC's first experience following the ESF, the agency is familiar with environmental, social, occupational health and safety standards, stakeholder engagement, grievance redress mechanisms, labor management and environmental and social safeguards management. They have a strong track record of safely managing the social and environmental risks of this type of work, as demonstrated in NLRC’s on-going Phase 1 of the project, carried out since 2017, particularly on stakeholder engagement where lessons learned will be adopted in the implementation of the project (Phase 2).

A program manager (PM) has been appointed. The PM will assist the NLRC in implementing the Environmental, Social, Health and Safety requirements for the project. The PM will also supervise NLRC construction coordinators, investigate and report all incidents related to environmental, social and health aspects that might occur during project implementation, and assist the NLRC in implementing the project's Environmental Social Commitment Plan (ESCP).

**II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS**

**A. Environmental and Social Risk Classification (ESRC)**

Moderate

**Environmental Risk Rating**

Moderate

The Project is classified as Moderate Risk (M). Project activities have minimal adverse environmental risks. Since the activities to be carried out are limited to the repairs of roofs of individual homes, the environmental risks from the proposed activities are very localized, temporary in nature, limited to the construction period, and mostly related to occupational health and safety of the workers and the home occupiers, which can be readily mitigated. Construction crews will wear protective gear during demolition of damaged roofs and repairs. Given the nature of the roofs to be repaired, should structures to be demolished present signs of mold or asbestos, the construction crews will follow mold and asbestos safe removal management procedures outlined in the project’s Environmental and Social Management Framework (ESMF).

Public Disclosure



**Social Risk Rating**

Moderate

The project social risk is considered Moderate risk (M). The project has minimal impact on households. NLRC as the implementing unit is experienced on the island, experienced in managing the social risks associated with the works, and experienced working with the populations being targeted. Project activities being carried out are an extension of work that has been carried out since 2017 without generating or exacerbating social issues. The population being targeted are vulnerable in that they are poor, and may not have legal status. In cases where land ownership is not clear, the NLRC will not exclude these households or residents from the program in order to not exclude the most vulnerable families from receiving important benefits that the project will bring. The NLRC’s approach is to ask renters/non owner occupiers to seek approval from the landlord prior to works being done. Furthermore, the NLRC will also pilot an agreement with landlords that they will not evict or raise rents subsequent to roofs being repaired. .

For safety or vulnerability reasons some potential beneficiaries may be requested to not remain in their house overnight during the short term period that the roof repairs will take. In these instances the grantee is committed and resourced to mitigate the social risk pertaining to any temporary relocation that is required during the roof repairs.

With regard to the World Bank requirements, in addition to a strong Grievance Redress Mechanism (GRM) that NLRC has in place, the project has already developed Stakeholder Engagement Plan (SEP) and Labor Management Procedures (LMP). The existing strong GRM has been refined to meet World Bank requirements with handling complaints about working conditions. NLRC will also establish a project level GRM process and it has already identified an organization that will support the management of gender-based violence complaints during project implementation. While the risks for GBV are considered low for this project, the NLRC will take advantage of existing relationships in order to ensure that any such incidents are handled appropriately and effectively.

**B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered**

**B.1. General Assessment**

**ESS1 Assessment and Management of Environmental and Social Risks and Impacts**

**Overview of the relevance of the Standard for the Project:**

An environment and social (E&S) screening did not identify significant potential environmental or social risks and/or impacts. An assessment was carried out based on the project proposal provided by NLRC, the scope of activities described in the project’s concept note, and the experience of NLRC in implementing community executed small works.

The proposed Project consists of technical assistance and minor works needed to repair 200 roofs as part of the Netherlands Red Cross (NLRC) Recovery Program on Sint Maarten. The NLRC has incorporated necessary E&S risk management processes and procedures consistent with ESS1 in the project’s Environmental and Social Management Framework, which will be disclosed prior to project appraisal.

The ESMF lays out the processes and procedures for selecting the specific home roof sites to be repaired. The ESMF includes an Environmental Code of Practices (ECOP) which will guide NLRC Program Manager and Construction Crews in the screening of specific risks and mitigation measures for each roof to be repaired and Occupational Health and Safety Guidelines (OHS) for the small works to be carried out, and for the handling of mold and asbestos should construction crews find their presence in the damaged roofs to be repaired.



The ESMF also delineates the principles and procedures to assess the need for temporary relocation and on a case by case basis, the mitigation measures, and the amount of compensation to be paid per household should temporary relocation is deemed needed. Potential beneficiaries will be required to sign a Beneficiary Agreement, for which a format is included in the ESMF. This Agreement requires that home occupants seek the approval of the land and home owner prior to becoming a beneficiary, as well as commit to other terms stipulated in the Beneficiary Agreement format. As in the previous phase of the project, potential beneficiaries will be made aware of the voluntary nature of the project, which is explained fully in the Beneficiary Agreement, which will be signed by the beneficiary. The Agreement details the compensation package that is available should it be deemed necessary for occupants to be temporarily out of their home during the evening, and how many nights the household is expected to be out of the house. Occupants will agree to be out of their home during the daytime while roof repair is ongoing. The Agreement also includes the contact details for managers at the Red Cross and the Grievance Redress Mechanism.

There is some risks associated with performing work on homes that were not built to the local building code, however the local building regulatory authority supports this project and is not requiring permits for roof repairs caused by the hurricane. From a structural standpoint the Red Cross team is experienced working on these homes and assessing their suitability to sustain further work.

### **ESS10 Stakeholder Engagement and Information Disclosure**

Building on lessons from phase one of the project, the NLRC has developed a Stakeholder Engagement Plan (SEP) which provides details on how key stakeholders will be engaged through project preparation and implementation. The SEP includes specific measures to allow continuous engagement and adequate communication prior to appraisal,, with a focus on beneficiary selection and project implementation.

### **B.2. Specific Risks and Impacts**

**A brief description of the potential environmental and social risks and impacts relevant to the Project.**

#### **ESS2 Labor and Working Conditions**

The risks and impacts pertaining to labor and working conditions are not considered complex and are easily mitigated by practices that the work teams and the NLRC country team is familiar with. Labor influx is not anticipated, thirteen construction teams, each consisting of four workers, who perform the repair work have been recruited locally in Sint Maarten and given NLRS employment contracts. Work crews are categorized as contracted workers under the ESF and under the NLRS contract they work the same hours as staff. There are no government workers engaged on this project. The work crews are defined as both beneficiaries as well as workers in the project given that many were recruited and then underwent training in order to increase their capacity to engage in this work and in the future when these project have ended will have skills to engage in future work in this area.



The NLRC has developed Labor Management Procedures (LMP) for the project which reflects their established processes for managing labor issues, such as safety requirements, training on safety, and complaints handling pertaining to misconduct or fraud. NLRC has adapted their current complaints handling criteria to include labor related complaints, the details of this are included in the LMP. The LMP has a GRM that allows workers and other local staff to register complaints through an anonymous system if desired. The GRM also includes matters of misconduct, harassment, including gender-based violence or discrimination protocols.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

Based on its experience in phase 1 of the program, NLRC will implement efficiency measures related to the efficient use of construction materials, minimizing any wastage of materials, additional and unnecessary creation of waste, and unnecessary transportation. This will be achieved by listing specific required materials and amounts per household and delivering these at the right timing only when repairs will effectively start – avoiding wastage through potential damages from wear and environmental conditions. The waste and debris generated from the roof repair activities of individual damaged roofs will be collected and disposed according to waste management procedures defined in the ESMF for the project. Similarly, if in the event a roof repair site requires the removal of asbestos construction materials, the NLRC Program Manager and the construction crew will follow an Asbestos Management Plan (AMP) which will be developed in coordination with the Public Health Department of the Department of Health (VSA) and the Solid Waste Management Division of VROMI, prior to project appraisal. The AMP will address respiratory protection of exposed construction crew workers together with measures to prevent the contamination of clothing and inadvertent transport of asbestos fiber off-site. Similarly, in the event a roof repair site requires the removal of mold, the Program Manager and the construction crew will follow mold removal procedures that will also be developed in coordination with VSA and VROMI. The roof repairs works include the use of humidity and mold resistant materials (sheetrock, woodwork, etc.) to prevent future mold issues. In all cases where asbestos or mold removal is needed, no inhabitants will be allowed on the premises while the roof repairs take place.

There are some risks associated with performing work on homes that were not built to the local building code, however, the local building regulatory authority supports this project and is not requiring permits for roof repairs for damage caused by the hurricane. From a structural standpoint the Red Cross team is experienced in working on these homes and assessing their suitability to sustain further work.

### **ESS4 Community Health and Safety**

The project targets the most vulnerable in the country. Subsequent to neighborhood selection, the NLRC will identify the poorest and most dilapidated homes through visual inspection. This will be followed by a household level assessment with a scoring criteria which the NLRC has developed to help prioritize the poorest households.

During the roof repair activities, the work site will be cordoned off. Any potential risk of collateral damage to neighboring properties will be part of the repair plan for each property and neighbors will be consulted and informed about the repair activities and timelines prior to commencing the roof repairs. The safety aspects for home occupiers during the roof repairs are assessed by teams using the “beneficiary assessment”, which covers social and technical



building issues. During the assessment the feasibility of conducting roof repairs while ensuring occupier comfort and safety is assessed by the field team.

Should mold removal or vector removal from the roofs be required in order to provide a safe and healthy working environment for workers and home occupiers, this will be included in the project. NLRC construction crews will remove any mold in roof elements, whilst equipped with protective gear (masks and goggles, etc.). The responsible local entities or organizations for vector control will be called in to ensure safe working conditions. Mold or vectors not constituting safety issues will be addressed through awareness raising to beneficiaries in the technical workshops as well as throughout the project.

Regarding SEA/SH issues, the GBV risk assessment for the project determined that the project is considered low risk for gender-based violence incidents. The project’s mitigation measures will include several measures to reduce risks of GBV incidents as a way to ensure that any incidents are taken seriously and resolved efficiently despite the identified low risk of GBV for the project. This will include informing project affected communities about GBV risks during the consultation process, reflecting GBV risks in the instruments like the ESMF, and having defined GBV requirements in the Code of Conduct. The Red Cross has identified a local partner whom they will refer any case of GBV if occurs during the implementation of the project.

**ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

The Standard is not relevant.

**ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

The Standard is not relevant.

**ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

The Standard is not relevant.

**ESS8 Cultural Heritage**

The Standard is not relevant.

**ESS9 Financial Intermediaries**

The Standard is not relevant.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways**

No

Public Disclosure





Not Applicable

**OP 7.60 Projects in Disputed Areas**

No

Not Applicable

**III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)**

DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED	TIMELINE
<b>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</b>	
<b>ORGANIZATIONAL STRUCTURE</b> Establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks. The responsibility for the management of E&S risks will lie with NLRC Project Manager in coordination with all NLRC construction crews who will play a role in daily monitoring of the ESMF.	12/2019
<b>ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK</b> Screen and thereafter implement any roof repair works in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, in a manner acceptable to the Bank.	12/2019
<b>ESS 10 Stakeholder Engagement and Information Disclosure</b>	
Implement the Stakeholder Engagement Plan (SEP), and update (as needed) from consultations with stakeholders before commencing the works.	12/2019
PROJECT GRIEVANCE MECHANISM: Establish, maintain and operate a grievance mechanism for the Project, as described in the SEP.	12/2019
<b>ESS 2 Labor and Working Conditions</b>	
<b>LABOR MANAGEMENT PROCEDURES</b> Implement the Labor Management Procedures (LMP) that have been developed for the Project.	12/2019
<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Establish, maintain, and operate a grievance mechanism (GM) for construction crews, as described in the LMP and consistent with ESS2.	12/2019
<b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> Implement occupational, health and safety (OHS) measures specified in the ESMF.	12/2019
<b>ESS 3 Resource Efficiency and Pollution Prevention and Management</b>	
Apply early screening of asbestos presence as underlined in the ESMF and follow procedures established in the Asbestos Management Plan prepared with VROMI and VSA.	12/2019

Public Disclosure



Debris originated directly from the repair activities collected and picked-up for final disposal, as underlined in the ESMF.	12/2019
<b>ESS 4 Community Health and Safety</b>	
COMMUNITY HEALTH AND SAFETY: Implement community disaster awareness and preparedness messages as underlined in the ESMF.	12/2019
GBV AND SEA RISKS: Implement (gender-based violence) GBV and sexual exploitation and abuse (SEA) prevention measures underlined in the ESMF, including a Code of Conduct and informing Project affected communities about GBV and SEA risks.	12/2019
<b>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>	
<b>ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>	
<b>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</b>	
<b>ESS 8 Cultural Heritage</b>	
<b>ESS 9 Financial Intermediaries</b>	

Public Disclosure

**B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts**

**Is this project being prepared for use of Borrower Framework?** **No**

**Areas where “Use of Borrower Framework” is being considered:**

None.

**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**



Borrower: Netherlands Red Cross

**Implementing Agency(ies)**

Implementing Agency: Netherlands Red Cross

**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

Task Team Leader(s): Alexander Agosti, Saurabh Suresh Dani  
Practice Manager (ENR/Social) Valerie Hickey Cleared on 06-Dec-2019 at 13:43:18 EST