



The Netherlands Red Cross

Home Repair Project

Sint Maarten

Hurricane Irma Recovery

Version for Negotiation
Environmental and Social Commitment Plan
(ESCP)

December 6th, 2019

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Netherlands Red Cross Society (hereinafter **NLRC**) will implement the Home Repair Project (the **Project**). The International Bank for Reconstruction and Development (hereinafter the Bank) has agreed to provide financing for the Project through the Hurricane Irma Reconstruction, Recovery and Resilience Trust Fund.
2. The NLRC will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The NLRC will also comply with the provisions of any other environmental and social (E&S) documents required under the ESSs and referred to in this ESCP, including the Environmental and Social Management Framework (ESMF), Labor Management Procedures (LMP), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by NLRC as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. As agreed by the Bank and NLRC, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, NLRC will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the NLRC. The NLRC will promptly disclose the updated ESCP.
6. In the case of changes to the Project's environmental and social risks and impacts – which result from (a) unforeseen circumstances that might impact the Project activities, or (b) proposals to change the Project, or (c) the Project's environmental and social performance –NLRC shall ensure the availability of the funds needed to implement the actions and measures required to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank quarterly monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, the implementation of the ESCP and the ESMF, occurrence of incidents and accidents, stakeholder engagement activities, functioning of the grievance mechanism, and other aspects of monitoring ESHS as detailed in the ESMF.</p>	Quarterly throughout Project implementation	NLRC Project Manager. The Project manager will be the main point of contact between NLRC and the Bank and will submit reports.
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, such as possible impact of natural hazards during Project implementation or any violations of the Code of Conduct.</p> <p>Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, whilst taking into account relevant data protection and privacy laws. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p> <p>Any logs maintained for recording grievances shall be made available to the Bank upon request.</p>	Within 48 hours after learning of any fatality or other incident or accident. Timing of the subsequent report will be provided within a timeframe acceptable to the Bank, as requested.	NLRC Project Manager
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks of the Project. 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.</p>	<p>The Project Manager confirmed and in place before Grant Agreement and to be maintained throughout Project implementation.</p> <p>Construction crews in place not later than 2 months after signing the Grant agreement.</p>	NLRC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p>ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK</p> <p>Finalize, adopt and thereafter implement the Environmental and Social Management Framework (ESMF) for the Project, which include site-specific requirements, in a manner acceptable to the Bank.</p>	<p>Draft ESMF has been prepared to be disclosed and consulted prior to Project appraisal.</p> <p>The revised version will be disclosed and submitted to Bank for approval prior to signing the grant agreement.</p> <p>The ESMF prepared shall be carried out throughout Project implementation.</p> <p>Subject to consultations with specific stakeholders identified after screening of homes, update and submit to Bank for approval prior to initiating the roof repairs. The updated version will be disclosed according to the provisions defined in the Stakeholder Engagement Plan.</p>	NLRC Project Manager
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Finalize, adopt, and implement the Labor Management Procedures (LMP) developed for the Project, in a manner acceptable to the Bank.</p>	The LMP shall be finalized and approved by the Bank prior to Grant approval.	NLRC Project Manager
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism (GM) for construction crews, as described in the LMP and consistent with ESS2.</p>	Labor GM in place throughout Project implementation.	NLRC Project Manager
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMF.</p>	Approved OHS measures as detailed in the ESMF carried out throughout Project implementation.	NLRC Project Manager
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Resource efficiency and pollution prevention and management requirements included in the ESMF requiring NLRC: (i) to apply early screening of asbestos presence, following procedures established in the Asbestos Management Plan;(ii) to collect and pick up debris originated directly from the repair activities, for final disposal.</p>	Demolition and Construction Debris Procedures and Asbestos Management Plan as underlined in the ESMF agreed with VSA and VROMI before Grant approval and in place before commencement of roof repairs.	NLRC Project Manager
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Implement community disaster awareness and preparedness messages as underlined in the ESMF.</p>	Approved ESMF and Code of Conduct enforced throughout Project implementation.	NLRC Project Manager
4.2	<p>GBV AND SEA RISKS</p> <p>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.</p>	NLRC Code of Conduct enforced throughout Project implementation.	NLRC Project Manager
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
Not relevant for the Project			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Not relevant for the Project			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not relevant for the Project			
ESS 8: CULTURAL HERITAGE			
Not relevant for the Project			
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant for the Project			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Disclose, consult, update (as needed) adopt, and implement a Stakeholder Engagement Plan (SEP), which will provide details on consultations with stakeholders, including on E&S documents.</p>	<p>SEP prepared, disclosed and consulted prior to Project appraisal. The revised version will be disclosed and submitted to Bank for approval prior to signing the Grant agreement.</p> <p>The SEP will be implemented throughout Project implementation.</p>	NLRC Project Manager

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, maintain and operate a Grievance Mechanism for the Project, as described in the SEP.</p>	The grievance mechanism for the Project will be established before Grant signing and will be maintained and operated throughout Project implementation.	NLRC Project Manager
CAPACITY SUPPORT (TRAINING)			
CS1	<p>TRAINING</p> <p>Training for Project workers on Occupational Health and Safety including on emergency prevention and preparedness and response arrangements to emergency situations, this may include:</p> <ul style="list-style-type: none"> • refresher course on workplace safety; • refresher course on incident reporting procedure; • Refresher course on emergency preparedness procedures; • Refresher course on grievances procedure • Course on new procedures regarding other dangers at the worksite mold, vector control, asbestos management, etc. 	Prior to initiating roof repair works, with periodic refresher courses occurring throughout Project implementation.	NLRC Project Manager