



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 11/07/2019 | Report No: ESRSC00931

**BASIC INFORMATION****A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Caribbean	LATIN AMERICA AND CARIBBEAN	P172619	
Project Name	Sint Maarten Irma 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.

**Financing (in USD Million)****Amount****Total Project Cost****3.47****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 but mainly focusing on roof repairs. The proposed grant will complement the Netherlands Red Cross (NLRC) second phase's 1,000 homes-repair program objective. The identification of specific sites where the works will be implemented will be defined as part of project implementation. However, based from the experience of NLRC's first phase of the program, the project will target areas most at need where most households live either in some degree of poverty, with lack of means to repair their homes. Certain areas are also characterized by fragmented communities



due to different migrant flows, 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, 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.

A program manager (PM) has been appointed. The PM will assist the NLRC in drafting 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.

## II. SCREENING OF POTENTIAL 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, Construction Crews will follow mold and asbestos safe removal management procedures, according to the project's Environmental and Social Management Framework (ESMF).



## 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 are an extension of work that has been carried out without generating or exacerbating any social issues. The population being targeted are vulnerable in that they are poor, and may not have legal status. There are some risks associated with doing construction work on homes that were built without a permit or were built on land without the land owner's permission, private or public land. The NLRC is considering an approach to seek approval from land owners should such cases arise, and this will be detailed in the ESMF.

For safety or vulnerability reasons some potential beneficiaries may be requested to not be in their house overnight, in these instances the borrower is committed and resourced to mitigate the social risk pertaining to any temporary relocation that is required during the roof repairs.

In regards to the World Bank requirements, the project has already developed a robust Stakeholder Engagement Plan (SEP), and Labor Management Procedures (LMP). The existing strong Grievance Redress Mechanisms (GRMs) the organization currently has are being refined to meet Bank requests in regard to handling complaints about working conditions and establishing a process for cases of gender-based violence.

## 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 Programme on Sint Maarten. The NLRC will incorporate any necessary E&S risk management processes and procedures consistent with ESS1 in the project's Environmental and Social Management Framework, which will be readily available prior to project appraisal. The ESMF will lay out the processes and procedures for selecting the specific home roof sites to be repaired. The ESMF will also delineate the principles, rules, guidelines, 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 or for small businesses, should temporary relocation is deemed needed. The ESMF will also include an Environmental Code of Practices (ECOP) which will guide NLRC 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.

Potential beneficiaries are required to sign a Beneficiary Agreement, for which a format will be included in the ESMF. This Agreement format will require 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 will also be explained fully in the Beneficiary Agreement, which will be signed by the beneficiary. This Agreement details the compensation package that is available should it be deemed necessary for occupants to be out of the 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.

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

None.

**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 different parts of the project. The SEP includes specific measures to allow continuous engagement and adequate communication prior to appraisal when key safeguards documents will be consulted on and disclosed, through to 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 county team is familiar with. Labor influx is not anticipated, thirteen construction teams who perform the repair work are 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 NLRC has a LMP which reflects their established processes for managing labor issues, such as safety requirements, training on safety, and complaints handling pertaining to misconduct or fraud. They have 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 and any mold removal will be collected and disposed according to the waste management plan which will be part of the ESMF for the project. Similarly, If in the event a roof repair site requires the removal of asbestos construction materials, the Construction Crew will follow an Asbestos Management Plan 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 commencing the works. 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.

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 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 Red Cross will identify the poorest and most dilapidated homes through visual inspection. This is followed by a household level assessment with a scoring criteria which the Red Cross has developed to help prioritize the poorest households. Potential beneficiaries are required to sign a Beneficiary Agreement, which will be in the ESMF, this requires that home occupiers 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 form. As in the previous phase of the project, potential beneficiaries will be made aware of the voluntary nature of the project, this will be explained fully in the Beneficiary Agreement, and will be signed by the beneficiary. This agreement details the compensation package that is available should it be deemed necessary for occupiers to be out of the home during the evening, and how many nights the household is expected to be out of the house. Tenants 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.

In addition, 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 and 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 a safe working condition. Mold or vectors not constituting safety issues for staff will be addressed through awareness raising to beneficiaries in the technical workshops as well as throughout the project. The roof repairs works includes the use of humidity and mold resistance materials (sheetrock, woodwork, etc.) to prevent future mold issues.

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. This will include informing project affected communities about GBV risks during the consultation process, reflecting GBV risks in the instruments like the ESMP, and having defined GBV requirements in the Code of Conduct.

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

There is no land taking, land use restrictions, or resettlement proposed as part of this project so ESS 5 is not relevant.

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

ESS6 is not relevant.

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

ESS not relevant. Any of the activities under the proposed grant would not have a direct impact on Indigenous Peoples as defined by ESS7.

#### **ESS8 Cultural Heritage**

ESS not relevant.

#### **ESS9 Financial Intermediaries**

Proposed grant will not channel funds to a Financial Intermediary with the objective of sub lending resources.

### **C. Legal Operational Policies that Apply**

#### **OP 7.50 Projects on International Waterways**

No

Not Applicable





**OP 7.60 Projects in Disputed Areas**

No

Not Applicable

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?**

No

**Financing Partners**

n/a

**B. Proposed Measures, Actions and Timing (Borrower's commitments)**

**Actions to be completed prior to Bank Board Approval:**

Preparation, consultation and disclosure before appraisal of the following instruments:

- (i) draft Environmental and Social Management Framework (ESMF),
- (ii) Labor Management Plan (LMP),
- (iii) Stakeholder Engagement Plan (SEP), including Project Grievance Reddress Mechanism (GRM),
- (iv) Draft Environmental and Social Commitment Plan (ESCP)

**Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):**

- (i) No works will start until final consultation with beneficiaries have taken place and required permission has been granted for construction crews to access the structures,
- (ii) Implementation of SEP,
- (iii) Identification of an appropriate service provider for Gender Based Violence cases should they be reported during the project within 14 days of Grant Approval as required by the World Bank Guidance note on GBV and civil works,
- (iv) Quarterly monitoring and reporting

**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

14-Nov-2019

**IV. CONTACT POINTS**

**World Bank**

Contact:	Alexander Agosti	Title:	Senior Disaster Risk Management Specialist
Telephone No:	458-8189	Email:	aagosti@worldbank.org



## The World Bank

Sint Maarten Irma Roof Repair Project (P172619)

Contact:	Saurabh Suresh Dani	Title:	Senior Disaster Risk Management Specialist
Telephone No:	473-8649	Email:	sdani@worldbank.org

---

### Borrower/Client/Recipient

Borrower: Netherlands Red Cross

### Implementing Agency(ies)

Implementing Agency: Netherlands Red Cross

## V. FOR MORE INFORMATION CONTACT

The World Bank  
1818 H Street, NW  
Washington, D.C. 20433  
Telephone: (202) 473-1000  
Web: <http://www.worldbank.org/projects>

## VI. APPROVAL

Task Team Leader(s): Alexander Agosti, Saurabh Suresh Dani