

Prepared For:



**Draft Environmental and Social
Management Framework for the
Guyana Access to Resilient Housing,
Basic Infrastructure, and Mobility
Services (GY-L1031) Program**

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Environmental Resources Management
1776 I (Eye) St. NW, Suite 200
Washington, DC 20006

Environment Safeguards Unit
Inter-American Development Bank
1300 New York Ave, NW
Washington, DC 20577

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David Blaha

Partner

Environmental Resources Management
1776 I (Eye) St. NW Suite 200
Washington, DC 20006

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1.0 INTRODUCTION

1.1 INTRODUCTION AND PURPOSE

In May 2017, the Government of the Cooperative Republic of Guyana (GOG) officially requested for the Inter-American Development Bank (IDB) to reformulate the 2012 loan operation “Road Network Upgrade and Expansion Program” (GY-L1031) to include a component addressing housing and basic infrastructure needs of low-income populations in social housing schemes in the greater Georgetown area. The reformulated program, labeled the “Adequate Housing and Urban Accessibility Program” necessitates an Environmental and Social Management Framework and Environmental and Social Analysis (ESA) of the sample for approval.

This Program will be designed to improve quality of life and facilitate further community and economic development in the selected communities through delivery of quality housing and basic infrastructure solutions. The affordable and sustainable housing sub-component (\$10M) will consist of subsidies designed for low-income households in the Georgetown area, for: (i) housing improvement; and (ii) construction of core homes on existing serviced lots. The infrastructure sub-component, which will follow a Multiple Works approach (\$18M), will finance will finance completion or rehabilitation of infrastructure and services on housing sites in the Georgetown area. Specific investments will be tailored to local conditions and include: (i) secondary road maintenance and rationalization; (ii) climate-ready drainage; (iii) power and water supply; and (iv) community facilities on earmarked publicly-owned lands that will include gender considerations regarding access and use.

The reformulated housing and urban development component will be executed by the Central Housing and Planning Authority (CHPA), part of the GOG’s Ministry of Communities. Under Bank loan guidelines, a multiple works program for the infrastructure subcomponent requires the definition of a “sample” investment project for execution, which is then followed by other interventions which follow previously approved operations regulations and environmental and social safeguards guidelines. The proposed sample project will be located in the area of Sophia, in central Georgetown.

ERM has been contracted to develop an Environmental and Social Assessment (ESA) for Sophia. Once selected, the other schemes will also undergo ESAs using the same framework and process. This document presents the Environmental and Social Management Framework (ESMF) to be applied to all subsequent infrastructure upgrades to ensure appropriate identification, assessment and management of environmental and social impacts.

1.2 OBJECTIVES AND SCOPE

IDB policies require that an ESA and ESMP be developed for the housing and infrastructure component of this Program, with the aim of identifying and managing environmental, social, health and safety impacts and risks of the

Program during construction and operation. This includes consultation with stakeholders.

To date one community has been selected for inclusion in the Program and serves as the sample project. An ESA has been developed for this sample community (Sophia). The process for selection of other communities will be carried out during loan execution. In the interim, this ESMF has been developed for later application to the selected communities. The primary objective of this ESMF is to ensure a consistent approach to the management of environmental, social, health and safety impacts and risks across the Program communities, while complying with all Guyanese requirements, IDB requirements, and international standards.

The objective of this ESMF is to guide the completion of the environmental studies necessary for the development of the projects in the rehabilitation of infrastructure and services on housing sites in the Georgetown area that don't fall within the sample of projects already approved. They also contain the minimum required content for each project management program necessary for the robust implementation of the program activities, from environmental management programs to stakeholder engagement and environmental education. The documents to be produced include the environmental evaluation process, which include disclosure and stakeholder consultation, as well as the proposed management and control processes that should all fall under a management system.

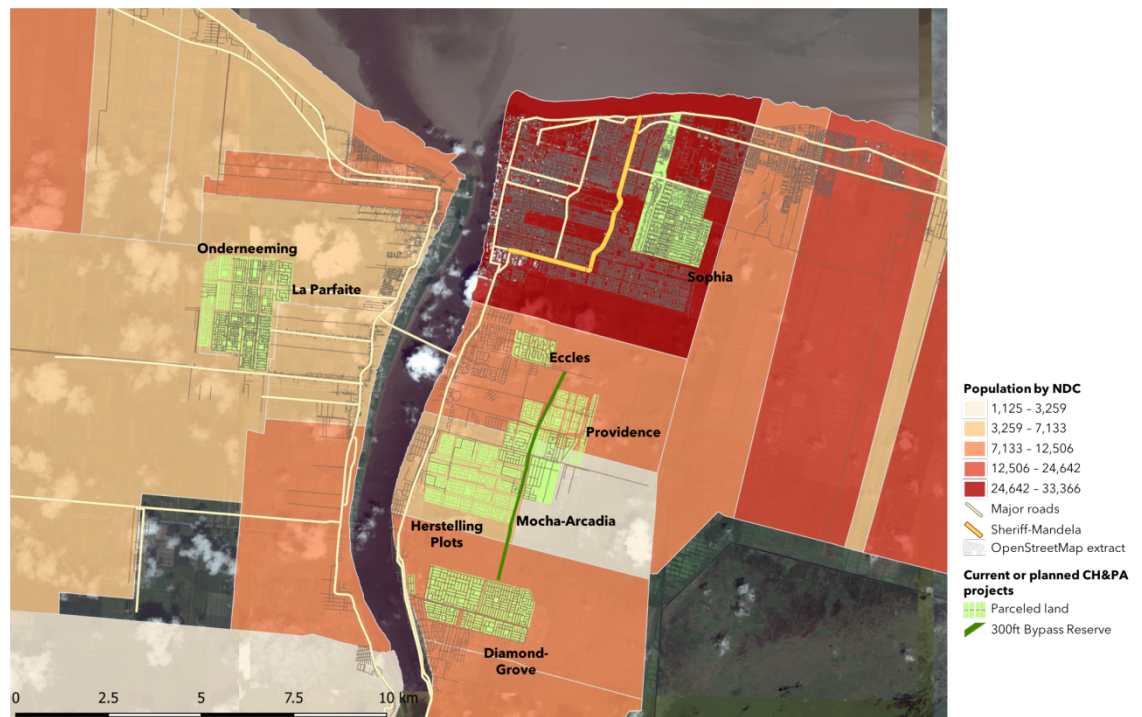
The objectives of the ESMF are: (i) be relevant and support all phases of the project; (ii) obtain the relevant permits; (iii) continue the development of the environmental requirements for works contractors; (iv) continue the development and implementation of the ESMF programs, strengthening the programs with human resources and any necessary materials; (v) monitor the implementation of the ESMF programs, with the goal of amending plans as necessary and guaranteeing the environmental viability of the projects.

2.0

PROGRAM DESCRIPTION

The Program will be located in Regions 3 and 4 of Guyana, in social housing schemes located along the West and East Banks of the Demerara River, within and adjacent to the urban footprint of the Guyanese capital city of Georgetown. While the complete set of areas for intervention will be selected according to approved project criteria and guidelines under the reformulated operation, Sophia will be included as the starting sample project. Potential sites are illustrated in Fig. 1-1 below.

Figure 2-1: CH&PA housing schemes under consideration for Program Inclusion



Source: IDB, 2017

There are some differences among these communities in terms of the level of occupancy, current level of infrastructure and services, and demographics. Land parcels in the social housing schemes are designated and allocated according to four different income level categories as follows:

- Low income: Income of less than GYD \$75,000 per year
- Moderate income: Income between GYD \$75,000 to \$150,000 per year
- Middle income: Income between GYD \$150,000 to \$500,000 per year
- High income: Income up to GYD \$1.2 million per year

Selection criteria for the multiple works subcomponent will include consideration of income levels and seek to target low-income communities. Sites will be selected from among CHPA's housing estates according to a set of criteria, including basic infrastructure deficits, concentration of low-income households, and accessibility issues.

All of the communities that are being considered for inclusion in the Program are located in Guyana's low-lying coastal plain and are therefore vulnerable to flooding. Floods in these areas occur when sea level rises during spring tide and during tropical storms by impacting low-lying riverine development and infrastructure. Flooding is also caused by rainfall-induced accumulation of water due to the country's outdated and insufficient drainage systems. Human factors such as inefficient management of solid waste, lack of regular maintenance of

existing drainage and irrigation infrastructure, and inadequate maintenance of sea defenses add to these risks.

The sample project for this Multiple Works Program will occur in Sophia, and will likely include the following works:

- 20 km (approx.) of asphaltic concrete road
- 7 km (approx.) of reinforced concrete drains
- 6 km (approx.) of reinforced concrete sidewalks
- 2 playgrounds/community centers
- Street lighting

Other components of the Multiple Works Program may consist of improvements as described in section 1.1, and additional Environmental and social eligibility criteria for the Program are discussed in Section 3.4.

3.0 ADMINISTRATIVE FRAMEWORK

This chapter summarizes Guyanese legislation and policies in Guyana that are applicable to the Program, as well as the IDB Safeguard Policies that are applicable to the Program.

3.1 NATIONAL LEGAL FRAMEWORK

This section provides an overview of the national environmental and housing and infrastructure-oriented legislation currently in force in Guyana that could apply to the Program.

National Constitution of Guyana

Guyana is governed according to the Constitution of the Co-operative Republic of Guyana, as amended. The constitution took effect in 1980 and expressly provides for protection of the environment. Article 25 establishes “improvement of the environment” as a general duty of the citizenry. In addition, Article 36 reads as follows:

In the interests of the present and future generations, the State will protect and make rational use of its land, mineral and water resources, as well as its fauna and flora, and will take all appropriate measures to conserve and improve the environment.
(OAS, 2013)

Environmental Protection Act

In 1996, the Environmental Protection Act (the Act) was ratified to implement the environmental provisions of the Constitution. The Act is Guyana’s single most significant piece of environmental legislation because it articulates national policy on important environmental topics such as pollution control, the requirements for environmental review of projects that could potentially impact the environment, and the penalties for environmental infractions (e.g. for littering, dumping, pollution, etc). It also provides for the establishment of an environmental trust fund. Most importantly, the Act authorized the formation of

the EPA, and establishes the EPA as the lead agency on environmental matters in Guyana (FAO, 2013). The Act further mandates the EPA to oversee the effective management, conservation, protection, and improvement of the environment (EPA, 2012). It also requires the EPA to take the necessary measures to ensure the prevention and control of pollution, assessment of the impact of economic development on the environment, and the sustainable use of natural resources.

Environmental Protection Hazardous Waste Management Regulations

These regulations outline rules and procedures for the transport, storage, treatment and disposal of hazardous substances, with the intent of protecting human health and the environment. For the purposes of these regulations, hazardous materials and wastes are:

- Explosives
- Flammable liquids
- Flammable solids or waste solids other than explosives which may be readily combustible
- Oxidizing substances
- Organic peroxides
- Poisonous substances
- Infectious substances
- Corrosives
- Toxic gases
- Toxic substances which if inhaled or ingested may cause delayed or chronic effects
- Toxic substances which, if released, may present immediate or delayed adverse impacts to the environment by means of bioaccumulation and/or toxic effects upon systems
- Material capable, after disposal, of yielding another material which possesses any of the characteristics specified above.

Environmental Protection Air Quality Regulations

These regulations require that any operation emitting air contaminants during the construction, installation, operation, modification or extension of any facility relating to industry, commerce, agriculture or any institution must apply to the EPA for an environmental authorization. The regulations also stipulate that the EPA shall establish emission limits for specific parameters; however these have not been established to date and international (World Bank) standards are used.

Environmental Protection Water Quality Regulations

These regulations require registration and environmental authorization for construction, installation, operation, modification or extension of any facility that will cause the discharge of effluents. The regulations include parameter limits for concentrations of specific constituents which can be discharged into any inland or coastal water or lands in Guyana.

Environmental Protection Noise Management Regulations

These regulations require operations that emit noise to apply to the EPA for an environmental authorization, and also establish permissible noise levels for specific types of land uses such as residential, institutional, educational, industrial, commercial, construction, transportation and recreational.

Town and Country Planning Act

This Act makes provision for the orderly and progressive development of land, cities, towns and other areas both urban and rural. The Act provides development guidelines for the built environment and is enforced by the Ministry of Communities' Central Housing and Planning Authority (CH&PA).

Regional and Neighbourhood Democratic Councils

The Local Domestic Organs Act, amended in 2006, divides Guyana into 10 regions each with their own Democratic Council (RDC), 33 Neighborhood Democratic Councils (NDCs), and 76 Amerindian Village councils for the purposes of administrative management. The RDCs have some level of autonomy though they are under the purview of the Ministry of Communities.

Water and Sewerage Act

This Act provides for the ownership, management, control, protection and conservation of water resources, provision of safe water and sewerage services, and regulation thereof. The Act establishes Guyana Water Incorporated (GWI), a merger of the previous bodies Guyana Water Authority and Georgetown Sewerage and Water Commissioners. The Act also defines fines for offenses relating to wastage, tampering, damage and pollution to waterworks

Labour Act

The 1942 Labour Act and its regulations specify the conditions that an employer must observe in the hiring of employees, including terms of payment. The Act also provides for prevention of discrimination and outlines conditions for the employment of young persons and children.

Occupational Health and Safety Act

The 1997 OHS Act regulates the registration and regulation of industrial establishments, and legally defines the responsibilities of workers and management with respect to keeping workplaces safe in both construction and operations phases.

3.2

NATIONAL POLICY FRAMEWORK

Guyana's government has articulated national policies on several environmental, social and development topics that are relevant to the Program. This section provides an overview of the key government policies applicable to the Program.

National Development Strategy

The National Development Strategy 2001 - 2010 (NDS) recommends priorities for Guyana's economic and social development policies. The document contains technical analysis of problems and future prospects in all sectors of the economy and in areas of social concern. A number of the priorities highlighted in the NDS are directly relevant to the Program, including transport infrastructure, housing, urban development and environment, as well as poverty eradication and gender equity (NDS, n.d.; <http://www.ndsguyana.org/downloads.html>).

National Environmental Action Plan

Guyana's National Environmental Action Plan (NEAP) articulates the national government's approach to managing the environment from the perspective of economic development. The NEAP considers the issues of environmental management, economic development, social justice, and public health to be inextricably linked. It identifies deforestation, pollution, and unregulated gold mining as historically minor but growing environmental problems, while identifying the country's most serious current environmental problem as being the relatively small, vulnerable area of the coastal zone where most of the population and physical assets are concentrated.

The NEAP is directly relevant to the Program in several ways. It identifies the coastal zone, where the Program communities are located, as an area in need of focused management due to the susceptibility of the coastal environment to both natural and human-induced degradation. It also identifies liquid and solid waste management, and establishment of national, regional and local institutions to improve environmental management as key priorities.

Integrated Coastal Zone Management Action Plan

Guyana's Integrated Coastal Zone Management (ICZM) process is an ongoing initiative to: promote the wise use, development, and protection of coastal and marine resources; enhance collaboration among sectoral agencies; and promote economic development. In 2000, after two years of study, the ICZM Committee produced an ICZM Action Plan, which was approved by the Cabinet in 2001.

The ICZM Action Plan addresses policy development, analysis and planning, coordination, public awareness building and education, control and compliance, monitoring and measurement, and information management (GLSC, 2006). Other coastal-zone related tasks currently being undertaken by the Government include: strengthening of the institutional setup for ICZM; a public awareness campaign to increase public understanding of the vulnerability of the coastal zone to sea level rise and climate change; and the creation of a database of coastal resources to facilitate improved ICZM. Currently, the EPA is mandated to coordinate the ICZM program and coordinate the development of the ICZM Action Plan through the ICZM Committee.

Under the Caribbean Planning for Adaptation to Climate Change (CPACC) Project, Guyana has conducted a socioeconomic assessment of sea-level rise as

part of a wider vulnerability assessment and developed a Climate Change Adaptation Policy and Implementation Strategy for coastal and low-lying areas. This information can be utilized in Disaster Risk Assessments and management planning, as necessary.

3.3 IDB SAFEGUARDS AND COMPLIANCE

The IDB has a list of environmental and social safeguards, which serve as the standard to which environmental and social performance on the part of funding recipients is evaluated against. The safeguards provide guidance as to the best-practice implementation of projects. Table 3-1 details the guidance relevant to the activities associated with this Program.

Table 3-1: IDB Safeguards

Policy/Directive	Applicable aspect	Performance Indicators
IDB B1: Bank Policies	Environmental Management and Resource Management Operation	Borrower/Executing Agency has legislation in place that promotes environmental management, training, and environmental governance and also promote conservation and sustainable use of natural resources
IDB B2: Country Laws and Regulations	Project Design	Program will comply with Guyana ESHS laws and regulations.
IDB OP-703: B.4 Other Risks	Governance capacity	Borrower/Executing Agency should exhibit institutional capacity for managing environmental and social issues.
	Disaster risk	A review of Program location is conducted to determine risk of being located in an area prone to disasters.
IDB OP-703: B.5	ESA and ESMP	Borrower/Executing Agency will complete an ESA including with a Social Assessment, and an ESMP, SEP and GMP.
IDB OP-703: B.6 IDB OP-102 International Best Practice	Consultation	Borrower/Executing Agency will develop a Stakeholder Engagement Plan that is scaled to the Program risks and impacts and development stage. The Borrower/Executing Agency will establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's E&S performance.
IDB OP-703: B.7: Supervision and Compliance	Monitoring	Borrower/Executing Agency will ensure allocation of budget for monitoring activities.
IDB OP-703: B9	Natural Habitats and Cultural Sites	The Borrower/Executing Agency will not support operations that significantly convert or degrade critical natural habitats or that damage critical cultural sites.

Policy/Directive	Applicable aspect	Performance Indicators
IDB OP-703: B10: Hazardous Materials IDB OP-703: B11: Pollution Prevention and Abatement	Pollution Prevention	The Borrower/Executing Agency will put in place specific mitigation measures and management plans to ensure pollution prevention during the construction and operations phases (e.g. fuel spills).
IDB OP-703: B17 Procurement	Worker ESHS	The Borrower/Executing Agency will ensure contractor contracts include requirements for adherence to IDB ESHS requirements.
IDB OP-704: A2	Risk and Program Viability	The Borrower/Executing Agency will evaluate the risk profile of natural hazards related to the Program.
IDB OP-703	Community Health, Safety & Security	The Borrower/Executing Agency will evaluate the risks and impacts to the health and safety of the Affected Communities during the Program life-cycle and will establish preventive and control measures consistent with good international industry practice.
IDB OP-710	Resettlement	The Borrower/Executing Agency has done everything to minimize the need for physical and economic resettlement; if resettlement occurs, the impact is managed in such a way so as to ensure resettlement becomes a development opportunity.
IDB OP-761	Gender Equality	The Borrower/Executing Agency will ensure that the operation will not affect women or gender equality negatively; Program will offer opportunities to promote gender equality or women's empowerment.

3.4

ENVIRONMENTAL AND SOCIAL CRITERIA FOR PROGRAM ELIGIBILITY

The process of selection criteria of the housing schemes to be included in the Program, as well as the final set of eligible interventions to be implemented in each scheme, is currently underway. At this time the main criteria for program eligibility are as follows:

- Location is not subject to legal disputes or ambiguity with respect to land and property tenure;
- Location and interventions will not require physical displacement or resettlement of households;
- Lands are not subject to significant environmental risks;
- Location is not within or adjacent to critical natural habitat;
- Location is not within or adjacent to indigenous communities;

- Intervention areas are accessible by various modes of transport including public transportation; and
- Location is not especially vulnerable to climate change risks and natural disasters.

As the selection process continues, additional criteria for Program eligibility may be identified and will be added to this list.

4.0 ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

4.1 ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

For each Project site, the Program will develop an ESA, the results of which will form the basis of an ESMS to supplement the Program's other management plans. This system will identify potential impacts of the Program in the given community and, in turn, describe steps for the mitigation, management, monitoring and assessment measures for the potential impacts identified in the ESA.

4.1.1 *Summary of Procedures for the Program*

The following table contains the environmental and social procedures applicable for this Program that the CHPA should follow during the selection of projects eligible:

Project Stage	Procedure Stage	Responsible	Tool	Supervision
Project Preliminary Identification	Identification and environmental and social classification	City council/CHPA	Environmental and Social Checklist (Annex 1)	CHPA
Preliminary project stage	Feasibility analysis/ Alternative Analysis	City council/CHPA		CHPA
Project Preparation	Preparation of studies	City council/Consulting firm or Consultant	Environmental and Social Assessment (ESA) + Stakeholder Engagement Plan + Grievance Mechanism (if applicable)	CHPA
	Communication and Participation	City council	ESA (ESMP) + Stakeholder Engagement Plan + Grievance Mechanism (if applicable)	CHPA
	Review	City Council/CHPA and IDB	ESA (ESMP) + Stakeholder Engagement Plan + Grievance Mechanism (if applicable)	CHPA
	Approval (Non-Objection)	City Council/CHPA and IDB	ESA (ESMP) + Stakeholder Engagement Plan + Grievance Mechanism (if applicable)	CHPA
	Publication	City Council/CHPA and IDB	ESA (ESMP) + Stakeholder Engagement Plan + Grievance Mechanism (if applicable)	CHPA
	Execution/ Construction	Implementation of the ESMP for Construction and Operation	Contractor	Bidding documents and Construction Contract (Annex 2- Outline PGES)
Construction Inspection		Inspection through the Works Inspector from CHPA	Inspection Report (should include ESHS aspects) (Annex 3)	CHPA
Operation and Maintenance	The Monitoring and Control depends on the type of Project (City Council/CHPA- Ministry of the Communities.			

4.1.2

Environmental and Social Assessment

The Urban Component of the Program has been categorized by the IDB as a Category B Program, which means that negative environmental and social impacts of the Program activities are likely to be mostly local and short-term, and can be readily mitigated with effective mitigation measures.

Based on the categorization of the Program, IDB Operation Policy 703 Directives B.3 and B.5 require that an ESMF be undertaken for the Program, given that it is classified as multiple works. Furthermore, an ESA for the selected sample should be performed, with development of an ESMP to identify and manage environmental, social, health and safety (ESHS) risks and impacts.

4.1.2.1 *ESA Contents*

The ESA for each Program site should include the following at a minimum:

Project Identification clarifying the direct and indirect area of influence, describing all of the systems and components to be developed, and specifying the different works and elements to be developed within the chosen area.

Project justification of alternatives that address project needs, presenting the socioeconomic feasibility of the systems, plants and designs at a comparable level.

Project characterization and the project specific components including:

- The location of the components within the municipality, detailing the indirect and direct area of influence at the correct scale;
- Description of all project components, current and anticipated; and
- Presentation of the project and intervention footprint considering protected areas, areas that will be recovered, including any urban or landscape impacts of all works;

Description of the interventions based on the most recent Program design and planning information available;

Administrative framework applicable to the Program, including relevant national laws and policy, IDB policies, and international best practices; assess if any licenses or permits are required for the specific project proposed.

Description of baseline ESHS conditions in the community that is fit for purpose and targeted to ensure a good understanding of the potential impacts and risks. Information sources that should be used for development of the baseline description could include publicly available databases, reports and studies; results from interview and focus group sessions; field observations; and remote sensing data. A combination of these data sources is typically appropriate.

Typical baseline components for this multi works Program would include:

- Air, noise, and water quality
- Socio-economics and Livelihoods
- Community Health, Safety and Security
- Community Services and Facilities
- Traffic

Identification and characterization of likely ESHS impacts, including a brief description of the impacted population(s) or individual(s) and their vulnerability characteristics. Impacts that are likely to be discussed in ESAs for this multi works Program are listed below in Table 4-1, as well as Project Evaluation Criteria to be considered by IDB and CH&PA

Table 4-1: Potential Construction and Operation Phase Impacts and Project Evaluation Criteria

Resource	Potential Construction Phase Impacts	Potential Operation Phase Impacts	Project Evaluation Criteria
Air Quality	Fugitive dust	No major impacts anticipated	Proximity to other emission sources
Noise	Construction noise	No major impacts anticipated	Proximity to other noise sources
Groundwater	Contamination from spills	Contamination from improper wastewater disposal	Proximity to other potential groundwater contamination sources
Surface Water	Contamination from erosion, sedimentation, and spills	Contamination from improper wastewater disposal	Proximity to other wastewater discharges that could affect community health
Biodiversity	Clearing of natural or critical natural habitat Impacts to IUCN red-listed species	Increased human activity near natural areas	Extent of disturbance of natural habitat and presence of any critical natural habitat or IUCN red-listed species
Cultural Heritage	Effects on cultural heritage sites or sites with cultural significance	Loss of access to sites with cultural significance	Presence of known cultural heritage sites or sites with cultural significance
Indigenous Peoples	Effects on traditional indigenous lands or displacement of Indigenous Peoples	Loss of access to traditional indigenous lands	Proximity of Indigenous Peoples
Land Acquisition	Land acquisition and physical	No major impacts anticipated	Project lands not subject to legal

Resource	Potential Construction Phase Impacts	Potential Operation Phase Impacts	Project Evaluation Criteria
	resettlement		disputes or ambiguity with respect to land and property tenure. Extent of any physical resettlement
Livelihoods	Loss of livelihoods and economic displacement	Loss of livelihoods and economic displacement	Extent of any current use of Project lands for livelihoods
Community Services and Infrastructure	Disruption of, or interruption of access to, community services and infrastructure	Increased demands for community services and infrastructure above their capacity	Location and capacity of community services and infrastructure
Traffic	Increased traffic (especially truck traffic)	Increased traffic	Availability of public transport to serve Project community
Natural Disaster Risk	Flooding	Flooding	Vulnerability of site to natural disasters resulting from climate change

Environmental and Social Management Plan: Recommendations for mitigation, management and monitoring of the identified impacts broken down by project phase (e.g. construction, operation). The results of the ESA will form the basis of an ESMS that will more fully detail the process for implementing and monitoring the mitigation and management measures.

Stakeholder Consultation: The ESA process must include stakeholder consultation with all Affected Populations. This consultation will serve the dual purpose of informing the Affected Communities about the Program and the ESA process, and of collecting local feedback and perspectives to inform the scope of the assessment.

4.1.3 **Budget for Environmental and Social Management**

The Program must ensure that sufficient funds are allocated for adequate management of ESHS issues. The required budget for ESHS management will depend on the types of interventions planned, as well as the magnitude of identified risks and the vulnerability profile of Affected Populations.

5.0 **OTHER REQUIRED STUDIES AND PLANS**

In accordance with IDB Policy Directives, the ESA process also requires consultation activities that include all Affected Populations, which should be carried out in accordance with a Program-specific Stakeholder Engagement Plan. A Grievance Mechanism is also required as part of the SEP.

The IDB's Safeguard Policies identify a range of other studies and plans that may be applicable to the Program depending on the site location and the interventions to be implemented. For example, in cases where livelihoods have the potential to be affected, a Livelihoods Restoration Plan (LRP) must also be prepared.

This chapter outlines the studies and plans that may be required as part of the ESMF for different Program sites, and provides guidance for the development of such studies and plans to ensure consistency across the Program.

5.1 *DISASTER RISK ASSESSMENT FRAMEWORK*

Considering that the potential areas of interventions in the multiple works Program are prone to flooding, as described in Section 2, this section provides the framework for preparing a Disaster Risk Assessment.

Utilizing relevant environmental data from the ESA, knowledge of the area, and any known climate data and trends, typical hazards are identified. These include, but are not limited to:

- rapid-onset hazards;
- inland flooding;
- hurricanes and tropical storm-strength winds;
- seismic activity and its effects (ground shaking, liquefaction, tsunamis, etc.);
- landslides;
- wildfires, etc.

The probability and magnitude of the hazards is then assessed (which can include where necessary modelling for coastal/inland flooding, erosion, groundwater for salt intrusion, climate change, etc.)

The components of risks for project, people, and environment are:

- Exposure (probability and intensity of natural disasters and the number of people exposed or threatened by these disasters); and
- Vulnerability (considering susceptibility, coping capacity, and adaptive capacity).

A vulnerability analysis to determine the existence and degree of vulnerabilities and exposure of the Program (or individual projects) to each threat is completed. The vulnerability analysis is broken down so that individual assets at risk (people, roads, buildings, operations) are assessed independently. In terms of the multiple works Program, contaminated water (environment), road and property damage (economic), and overburden of emergency response (social) are likely to be the most common and severe risks.

The indirect impacts to surrounding communities in the direct area of the influence of the Project should also be considered in the analysis.

Consequence (from insignificant to severe) and probability of occurrence (almost certain to rare) are assigned rankings and the general level of risk (extreme to low) is determined. A capacity analysis is completed which identifies the capacities and resources available to reduce the level of risk as low as reasonably possible (ALARP).

Types of mitigations and recommendations for flood risks for the Program include preparing and implementing a storm water management plan for the Program during construction and operation phases, as well as developing a flood warning and flood emergency preparedness plan (FEPP). The FEPP should include the community's response to flooding, flood warning system, dissemination of flood risk maps, and location of evacuation centers, primary evacuation routes, and post flood recovery processes.

Based on the assessment, decisions are made on which risks require countermeasures and priorities are assigned. These form the basis of the Disaster Risk Management Plan which recommends measures to prevent and/or mitigate the identified impacts and risks, and provides guidance relative to emergency preparedness and response. There are typically four key components:

- Understanding key risks/vulnerabilities;
- Identifying actionable plans for reducing risk;
- Determining priority areas for action; and
- Implementation.

Table 5-1 presents a disaster risk management framework for the Program.

Table 5-1: Disaster Risk Management Framework

Event	Specific cause	Effect	Plan	Prepare	Response	Recovery	Responsible Parties	Monitoring
Storms	Excessive precipitation	High water levels and overland flow exposes or damages	Design protective structures that consider high flow events and add climate change factor. Combine Green infrastructure with existing and/or new flood protection structures. Perform a localized drainage study and survey for the catchment and network serving the Program area.	Complete regular integrity and condition inspections. Designate and retain an on-call engineering inspector Obtain on-call repair services contract	Isolate affected segment. Contact engineer for assessment Evaluate damages on homes and businesses Coordinate response activities with GRC and CDC.	Complete repairs Identify and implement activities that will reduce or eliminate risk of repeat failure Test repaired systems Conduct an assessment of the causes and effects of the flood to make recommendations that would improve preparedness for the next event and reduce losses associated with future flood events.	Plan: Project engineer Prepare: Engineering inspector from appropriate ministry or government agency, e.g. Ministry of Public Infrastructure Response: CH&PA in coordination with GRC and CDC Recovery: CH&PA in coordination with CDC and relevant ministries and agencies (e.g. Public Infrastructure, GWI)	Monitoring of infrastructure conditions and integrity on a monthly basis
	Excessive precipitation	Erosion with exposure or damage to riverbanks and/or facilities	Determine and install bank and slope protection or anchors if possible in most vulnerable areas. Combine Green infrastructure	Complete regular integrity and condition inspections. Designate and retain an on-call engineering inspector	Isolate affected segment. Contact engineer for assessment Evaluate damages on homes and businesses	Complete repairs Identify and implement activities that will reduce or eliminate risk of repeat failure Test repaired	Plan: Project engineer, construction contractor Prepare: Engineering inspector from appropriate ministry	Monitoring of infrastructure conditions and integrity on a monthly basis Erosion monitoring by relevant

Event	Specific cause	Effect	Plan	Prepare	Response	Recovery	Responsible Parties	Monitoring
			with existing and/or new erosion protection structures (e.g., riprap)	Obtain on-call repair services contract Conduct erosion monitoring along the banks of the Demerara River	Coordinate response activities with Public Works, EPA, GRC and CDC.	systems Conduct an assessment of the causes and effects of floods/erosion to make recommendations that would improve preparedness for the next event and reduce losses associated to future flood events.	or government agency, e.g. Ministry of Public Infrastructure Response: CH&PA in coordination with GRC and CDC Recovery: CH&PA in coordination with CDC and relevant ministries and agencies (e.g. Public Infrastructure, GWI)	government ministry or agency (EPA, Ministry of Public Infrastructure, or EPA).
Increased water levels	Storm Surge and/or Sea Level Rise	High water levels and overland flow exposes or damages	Design protective structures that consider high flow events and add climate change factor. Combine Green infrastructure with existing and/or new flood protection structures. Perform a localized drainage study and survey for the catchment	Complete regular integrity and condition inspections. Designate and retain an on-call engineering inspector Obtain on-call repair services contract	Isolate affected segment. Contact engineer for assessment. Evaluate damages on homes and businesses. Coordinate response activities with GRC and CDC.	Complete repairs Identify and implement activities that will reduce or eliminate risk of repeat failure Test repaired systems. Conduct an assessment of the causes and effects of the flood to make recommendations that would improve preparedness for	Plan: Project engineer Prepare: Engineering inspector from appropriate ministry or government agency, e.g. Ministry of Public Infrastructure Response: CH&PA in coordination with GRC and CDC Recovery: CH&PA in coordination with CDC and relevant ministries and agencies (e.g. Public	Quarterly monitoring of sea and river defense infrastructure conditions

Event	Specific cause	Effect	Plan	Prepare	Response	Recovery	Responsible Parties	Monitoring
			and network serving the Program area			the next event and reduce future flood loses.	Infrastructure, GWI)	

STAKEHOLDER ENGAGEMENT AND CONSULTATION PLAN

This section provides the framework for the development of site-specific Stakeholder Engagement Plans (SEPs) for the Program. The purpose of the SEPs is to set out the approach that the Program will follow to implement a two-way engagement and consultation program with stakeholders over the life of the Program.

A stakeholder is defined by the International Finance Corporation as “*any individual or group who is affected by a project or may have an interest in, or influence over it. This may include individuals, businesses, communities, local government authorities, local nongovernmental and other institutions, and other interested or affected parties.*” This SEP framework focuses on engagement with external stakeholders, meaning those not directly involved in the construction, operation, permitting or financing of the Project.

A SEP is a ‘living’ document and is developed progressively, and updates issued, as a project moves through the various phases of planning and implementation.

A SEP is typically organized as follows:

- Section 1 provides background information about the Program and outlines the objectives of stakeholder engagement;
- Section 2 outlines national and international requirements for stakeholder engagement;
- Section 3 provides an overview of the local context, and describes how stakeholders are identified and the methods and tools used to support engagement;
- Section 4 summarizes stakeholder engagement undertaken to date by the Government of Guyana and IDB;
- Section 5 provides the program for ongoing and future engagement;
- Section 6 describes roles, responsibilities and resources for stakeholder engagement;
- Section 7 explains the ways in which stakeholders can contact IDB and/or Program developers and proponents, including the grievance mechanism for the Program;
- Section 8 describes the monitoring and reporting of stakeholder engagement activities.

Development, update and implementation of the Program SEPs are the responsibility of CH&PA.

Section 1: Background and Objectives

In May 2017, the Government of the Cooperative Republic of Guyana (GOG) officially requested the Inter-American Development Bank (IDB) to reformulate the 2012 loan operation “Road Network Upgrade and Expansion Program” (GY-

L1031) to include a component addressing housing and basic infrastructure needs of low-income populations in social housing schemes in the greater Georgetown area. The reformulated program, labeled the “Adequate Housing and Urban Accessibility Program,” includes a housing and urban development component that will be executed by the Central Housing and Planning Authority (CHPA), part of the GOG’s Ministry of Communities.

Stakeholder engagement (including consultation and the disclosure of information) is a key element of project planning, development, and implementation. Effective stakeholder engagement assists good design, builds strong relationships with local communities, and reduces the potential for delays through the early identification of issues to be addressed as a project progresses.

The IDB is committed to a transparent and respectful dialogue with stakeholders throughout the life of the Project. The activities of engagement are guided by contractually defined international best practice, as well as all applicable laws and regulations in Guyana.

The aims of stakeholder engagement, and of the Program SEPs, are to:

- Promote the development of respectful and open relationships between stakeholders, CH&PA, and IDB during the Program life-cycle;
- Identify Program stakeholders and understand their interests, concerns and influence in relation to Program activities, particularly during the construction phase;
- Provide stakeholders with timely information about the Program, in ways that are appropriate to their interests and needs, and also appropriate to the level of expected risk and adverse impact;
- Provide stakeholders the opportunity to express their opinions and concerns in relation to the Project, and for these to be reflected in the Program’s Environmental and Social Management Framework (ESMF), and decisions about Program construction and operations activities, where possible;
- Support compliance with Guyanese legislation for public consultation and disclosure and alignment with financing standards and guidelines for stakeholder engagement; and
- Record and resolve any grievances arising from Program-related activities through a formal Grievance Procedure, managed by CH&PA.

Additionally, should a detailed livelihood survey and census indicate that the Program could result in economic displacement, the SEP will also:

- Provide the framework for stakeholder involvement in identifying appropriate processes for compensating displaced individuals and businesses.

Section 2: Regulatory Framework

This section provides the regulatory framework that governs the Project including national legislation and policy, as well as applicable Bank policies.

Guyanese regulatory requirements and applicable IDB Policies are outlined in Chapter 3.0 of this ESMF document.

Section 3: Stakeholder Analysis

Local Context Overview

It is helpful to group stakeholders based on common interests and characteristics. Use of a number of ‘stakeholder categories’ helps structure activities for stakeholders of the Program, including a summary of the anticipated interest of these groups with respect to the Program and within the local context (e.g. potential impacts, benefits, concerns). A database of stakeholders has been developed and will continue to be updated as additional stakeholders are identified. The list includes the following stakeholder categories as defined in Table 5-2.

Table 5-2: Stakeholder Categories and Identification

Stakeholder Category	Interest in Project	Stakeholders Identified to Date
National Government	National authorities have an interest in the EIA and permitting procedures, particularly in terms of ensuring compliance with Guyanese regulations. In addition to their regulatory role, government departments have specific interests in topic areas such as land acquisition, transport and water usage.	Central Housing and Planning Authority (CH&PA).
Regional and Local Governments	Local and regional authorities have a general interest in the potential impacts and benefits for their respective communities.	Ministry of Communities, Ministry of Social Protection, Ministry of Public Infrastructure, and the local NDC.
Local Communities and Beneficiary population	Local Communities within the Georgetown may be affected by impacts related to traffic, noise, and environmental changes, as well as changes to land use	To be determined during project development and via further engagement with Affected

Stakeholder Category	Interest in Project	Stakeholders Identified to Date
	and access. They may also be able to benefit through employment and business opportunities and the Project's overall improvement to housing and infrastructure.	Communities
Community groups	This includes faith-based organizations, community and social groups, and service clubs who may have an interest on behalf of their constituents.	Rotary Club and Lions Club.
Land and Resource Users and Rights Holders	Information available to date indicates that there is no plan for physical or economic displacement in the neighborhoods within which infrastructure for this Project will be built. (See "Note on Resettlement" below)	To be determined via further engagement with Affected Communities
Local Businesses	Local businesses may experience or perceive impacts to their business as a result of construction and have the opportunity to participate in the Project's local employment and supplier development initiatives. Negative impacts to informal businesses (e.g. street vendors) could also be a concern.	To be determined as Project reaches construction phase
Community Services and Infrastructure	Community service and infrastructure providers are interested in how the Project might impact on community services and infrastructure development plans. This may include direct impacts (e.g. on road infrastructure or water mains) or indirect impacts (e.g. increased strain on local services due to use by Project workforce).	
Local and	NGOs (including local,	Habitat for

Stakeholder Category	Interest in Project	Stakeholders Identified to Date
International NGOs	national and international NGOs, as well as other community based organizations) may be interested in a diverse set of issues, ranging from access to water, to potential impacts on traffic and businesses.	Humanity, YMCA/YWCA, and Guyana Red Cross Society; UNDP, UNICEF, PAHO.
Media	Journalists and other representatives of the media are often interested in ensuring that clear and transparent information about the Project is communicated to the national population.	To be determined via further engagement
Academic or Research Organizations	Academic or research organizations may be interested in the monitoring and evaluation data obtained from the Project to help inform country-wide development aid indicators. These organizations may also be interested in local content and training programs.	To be determined via further engagement

Stakeholder Identification and Mapping

The process of stakeholder identification includes identifying individuals, groups, local communities and other stakeholders who may be affected by the project; identifying broader stakeholders who may be able to influence the outcome of the project; identifying legitimate stakeholder representatives (such as elected officials, non-elected community leaders, etc.); and, mapping the impact zones by placing the Affected Communities within a geographic area. As part of the stakeholder identification process, it is important to include individuals and groups who may find it more difficult to participate in engagement and to understand how each stakeholder may be affected, or perceives they may be affected, so that engagement can be tailored to inform them and understand their views and concerns in an appropriate manner. Examples of this may be performing engagement activities specifically for women, single-caregiver households, visible minorities, separate from those for the general public to ensure their voices are adequately heard and considered.

The appropriate type of engagement is determined by a number of factors, including the likely impact of the project on the stakeholder (often related to

location), their influence over the project, and their preferences and abilities to access information and participate in consultation.

Stakeholders for the Project continue to be identified in several ways. These include:

- Drawing on the local knowledge of IDB and CH&PA staff, particularly those with stakeholder engagement responsibilities;
- Desktop research including information provided in Environmental and Social Assessments;
- Observations made during field visits to local communities and users in the Program areas; and
- Site visits and interviews with key informants including NGOs active in the area and Government of Guyana representatives.

The process of engaging stakeholders helps to identify further stakeholders as the Project develops. The mapping process allows IDB to better understand the type of engagement which is best suited for each stakeholder depending on their level of interest in and influence on the Project (dynamic communication, constant engagement, information purposes only, etc.). The dynamic nature of communities and settlements also means that an engagement and mapping exercise needs to take place throughout the lifetime of the project to update the content and ensure the engagement processes remain relevant to stakeholders.

Disclosure and Engagement Methods and Materials

The engagement process encourages meaningful participation by stakeholders. CH&PA will employ a range of methods and channels for disclosing information in order to tailor disclosure to the interests and needs of the various stakeholder groups, and will also produce materials appropriate for specific stakeholders and types of engagement. This may include: interviews with stakeholder representatives and key informants; surveys, polls, and questionnaires; public meetings, workshops, and/or focus groups with specific groups; and other participatory methods.

Clear, accurate, and comprehensive informational materials for use with stakeholders during consultation events will be produced. These materials will be updated as the Project evolves and supplemented with additional materials to include:

- Project fact sheet;
- Frequently Asked Questions;
- Advertisements for public meetings; and
- Project maps.

Feedback mechanisms (also referred to as Project contact vehicles) are adapted to suit the needs and preferences of different stakeholders and their physical locations. To give stakeholders easy and convenient access to the Project, the following contact vehicles will be put in place:

- Toll-free number for general Project inquiries: [TBD]
- General email address: [TBD]
- Mailing address: [TBD]

The contact vehicles must be monitored regularly and response protocols will be developed to ensure all inquiries are tracked for reporting purposes and that responses are provided. A CH&PA officer will serve as an identified point of contact for stakeholders.

Section 4: Completed Stakeholder Engagement

As a living document, the SEP should be updated to document stakeholder engagement activities conducted to date, including public consultation meetings, community meetings, and interaction with the various government entities involved in planning, permitting and approvals for various components of the overall Program. A brief summary of the events, along with appended minutes and attendance sheets, should be provided. The stakeholder database should also be updated with new information obtained over the course of the engagement events.

Section 5: Ongoing and Future Stakeholder Outreach

After ESA-specific consultation events have been completed, CH&PA should continue to engage with the community regularly to provide updates on Program progress and activities. Engagements should include the use of informational materials such as brochures, maps, and posters as more specific information on the Program becomes available.

CH&PA should also continue to actively monitor contact vehicles as the Program progresses, to ensure that stakeholder concerns continue to be identified, addressed, and actioned as necessary.

Section 6: Roles, Responsibilities and Resources

CH&PA should allocate staff and resources devoted to managing and implementing the Program's Stakeholder Engagement Program. As the formal stakeholder engagement process commences, the IDB will identify the primary staff members responsible for stakeholder engagement at all levels as it pertains to the environmental and social components of the Project.

CH&PA has established a stakeholder register that will be continually updated as additional stakeholders are identified, or as new information regarding stakeholders becomes known. CH&PA will also complete attendance records at every meeting, and will have designated note-takers at each meeting to document issues, concerns, suggestions and questions raised by attendees for consideration in the ESA and other Program planning processes.

Section 7: Contact with Program proponents

Stakeholders can contact CH&PA, as well as the IDB, at any time by letter, phone, or email. Communications with IDB can be conducted in French, English,

or Spanish as necessary. Contact information will be provided as the formal stakeholder engagement process commences.

Stakeholders are invited to provide feedback about the Program. This will allow CH&PA and IDB to monitor how the Program is doing, and will help it identify areas of improvement. The Program will treat all types of feedback with professional consideration, confidentiality and respect, and base its responses on open and honest communication.

In order to effectively manage, respond to, and benefit from stakeholder feedback, all feedback received will be documented, forwarded internally for action, implemented (where appropriate) into ongoing planning and implementation of the Program, and responded to when necessary.

Section 8: Monitoring and Reporting

Monitoring

It is important to monitor stakeholder engagement to ensure that consultation and disclosure efforts are effective, and in particular that stakeholders have been meaningfully consulted throughout the process

Monitoring for stakeholder engagement will include:

- auditing implementation of the Stakeholder Engagement Plan;
- monitoring consultation activities conducted with government authorities and non-governmental stakeholders;
- monitoring the effectiveness of the engagement processes in managing impacts and expectations by tracking feedback received from engagement activities; and
- monitoring and analyzing any grievances received including recidivism rates.

Tracking Stakeholder Engagement Activities

Performance will be reviewed regularly against the SEP. Tracking of stakeholder engagement will be used to assess the effectiveness of the Program's stakeholder engagement activities. Indicators for tracking will include, among others:

- place and time of formal engagement events and level of participation including by specific stakeholder categories and groups (e.g. women, single-caregiver households);
- number of comments by topic and type of stakeholder, and details of feedback provided through the Grievance Procedure or other means (office visits, emails, phone calls) always removing identifying information to ensure continued confidentiality;
- numbers and types of grievances and the nature and timing of their resolution;
- recording and tracking commitments made to stakeholders; and
- community attitudes and perceptions on Program activities based on media reports and stakeholder feedback.

Program Reporting

Annual Reports will summarize all activity for the period, and provide a summary of issues raised and how they have been addressed. Potential issues include timeliness of responses and corrective and mitigation measures taken to address grievances, and analysis of trends in key performance indicators (KPIs). These may include:

- total numbers of stakeholders engaged according to stakeholder category;
- numbers of comments and queries received according to topic and responses;
- Number of people enrolled in support programs;
- Number of people completing the support program;
- Social Indicators over time:
- Level of access to services/utilities;
- Health indicators (types and quantities of illnesses);
- Security incidents;
- Responses to satisfaction surveys;
- Media spots (positive, negative and neutral);
- Social Media trends; and
- protests, strikes, posters, fliers against the project.
- numbers of grievances lodged; and
- grievance resolution timeliness.

The SEP will be reviewed on a regular basis and revised as needed to reflect completed engagement activities and revise and confirm future engagement plans.

GRIEVANCE MANAGEMENT PLAN

While some feedback may be positive, some people may have complaints about Project activities and this type of feedback is managed through the Program's Grievance Procedure.

A grievance is a complaint that someone has about the activities of the Program that might stem from:

- A specific incident – such as a road accident, property damage or night-time noise;
- The behavior of workers – such as disrespectful or discriminatory actions;
- An environmental impact – such as soil contamination, or damage to agriculture;
- A social impact – such as loss of recreation areas;
- Other types of impacts – such as traffic, health, and cultural heritage impacts.

Specific objectives of the Grievance Procedure are:

- To help CH&PA and/or IDB identify issues and concerns early, so that they can be addressed quickly and proactively;
- To continuously improve Program performance in all areas; and
- To demonstrate the Program's commitment to meaningful stakeholder engagement, and respect for local opinions and concerns.

CH&PA will use the Grievance Procedure, working in partnership with its contractors and with oversight from the IDB, as a critical component of the broader stakeholder engagement activities, including monitoring and reporting. A member of the CH&PA development team will be assigned as the person in charge of managing the grievance mechanism, including the internal processes for ensuring grievance resolution. This individual should work closely with the competent team involved in similar actions as part of the Stakeholder Engagement Plan to ensure consistency in the content and processes involved, as well as to share information and lessons learned, and to prevent stakeholder fatigue from over-engagement.

Grievance procedure overview

A grievance procedure is a program that seeks to compile, register, and resolve grievances, complaints, concerns or questions from stakeholders of any kinds. In this case, the mechanism is designed for any person, household or group impacted by displacement and resettlement as a result of Project activities. The implementation of a Grievance Mechanism (GM) will complement any proactive or preventative policies or procedures already in place, ensuring that when administrative controls do not adequately address an issue, there is recourse for resolution.

Guiding Principles

The GM must be in compliance with international standards, including the IDB's Operational Policy 7.10 on Involuntary Resettlement and International Finance Corporation's Performance Standards (2012), particularly Performance Standard 1 on Assessment and Management of Environmental and Social Risks and Impacts and Performance Standard 5 on Land Acquisition and Resettlement.

To this end, the guiding principles for the GM should be the following:

- Provision of information: All affected people should be informed about the GM from the first time engagement takes place, early in the Program planning process, and details about how it operates should be easily available, for example, in public areas impacted by the Project including shops, schools, churches etc.
- Transparency of the process: Program-affected people must know to whom they can turn in the event of a grievance and the support and sources of advice that are available to them.
- Ensuring up to date information: The process should be regularly reviewed and kept up to date, for example, by referencing any new statutory guidelines, changes in routes or benefits.
- Confidentiality: The process should ensure that a complaint is dealt with confidentially.
- Non-retribution: Procedures should guarantee that any project affected person that raising a complaint will not be subject to any reprisal.
- Reasonable timescales: Procedures should allow for time to investigate grievances fully, but should aim for swift resolutions. The longer a grievance is allowed to continue, the harder it can be for both sides to get back to normal afterwards. Time limits should be set for each stage of the process, for example, a maximum time between a grievance being raised and the setting up of a meeting to investigate it.
- Right of appeal: A Program-affected person should have the right to appeal to a higher level of Program management (e.g., CEO or Director levels) if he or she is not happy with the initial finding. Legal action may be pursued as a later stage of appeal.
- Right to be accompanied: In any meetings or hearings, the aggrieved party should have the right to be accompanied by a colleague, friend or legal representative.
- Recordkeeping: Written records should be kept at all stages. The initial complaint should be in writing if possible, along with the response, notes of any meetings and the findings and the reasons for the findings.

Scope

The GM should be implemented and active throughout all points of the Program life cycle, from present day through closure, and every Program-affected person should have access to it.

Activities during Implementation

The activities below offer suggestions on how each of the components of the GM should be implemented. Although the content of each of these is flexible and

should be built based on the specific context (and as such can be modified and changed as needed, so long as there is sufficient notification with stakeholders to ensure continued accessibility of the process), the content of the GM should remain consistent with this guideline.

Communication

- Office hours from a member of the Community Relations or Development team;
- Phone numbers or internet, depending on accessibility of technology;
- Feedback boxes, as well as clearly signposted maps showing where they are located – preferably in highly transited areas including schools, churches etc.

Receipt and Registration of Grievances or Complaints into the System

- Establish forms to be filled in with all necessary information – clarity that if a grievance is submitted verbally, it must be transcribed as soon as possible after.
- Details should be compiled – electronically if possible, and registers of chain of custody and communication must be established.
- When a grievance is received with a name attached, the aggrieved party must be notified within a specific timeline that their grievance has been registered, as well as providing a timeline for future activities, including the timeline by when the Company should have a proposed resolution.
- When a grievance is received without a name attached, the grievance must be addressed and documented within a pre-specified timeframe. Report should be compiled with others of the same sort, and the relevant information (general concerns, how they have been addressed) should be periodically posted somewhere public, where they can be seen. This should in no way infringe on the confidentiality of any aggrieved party and should not include any specifics (e.g. Complaints about timeline for compensation – have completed an investigation as to the hold-up, and have started discussions with the bank to speed-up payments).

Evaluation and categorization of grievances

- Categorization should differentiate based on relevance (question rather than complaint, request, issue not associated to the project), and urgency (risk to life or property), extent (individual complaints vs. group complaints) etc.
- Where necessary / relevant an interview with the aggrieved party could be helpful, including requesting further details.
- Directing the grievance to the relevant teams for follow up.

Prioritization of grievances and response time

- Must identify a specific response time for confirming receipt of grievance, for completing an investigation and for providing an

initial offering of resolution. If at any point these timelines are not addressed, this must also be justified in the documentation.¹

Options for resolution or response

- Options for response should include: including unilateral response; bilateral response (the aggrieved party and the Company can offer a solution together); third party response (through a mediator); or through a judicial process, outside of the mechanism. Considering the purpose of the mechanism is to effectively address concerns before they escalate, it is important to maximize the opportunities for bilateral response wherever possible.
- Preparing the response
- Closing the case

Resources and Costs

A budget should be put in place to pay for any responses involving compensation (in kind or monetary), as well as for the time of those involved in investigating and addressing any issues.

The relevant management staff should be involved in the grievance process from the earliest point in the process, and decision makers should be involved in the process from the onset, to ensure timely turnaround of responses.

The grievance must be escalated as needed, and there must be clarity on the part of all management staff the importance of appropriate responses to grievances.

Responsible parties

The GM should be implemented throughout every phase of the Program by an appropriate team, led preferably by the same person who leads the Stakeholder Engagement activities. The composition of the team responsible for the implementation should be sufficient to cover the necessities (considering number of project affected households, the magnitude of impact, the ratio of economic vs. physical displacement, if any, etc.)

Indicators and Monitoring

There are a number of indicators that should be considered in order to make best use of the GM as a tool throughout the life of the Program. These include, but are not limited to:

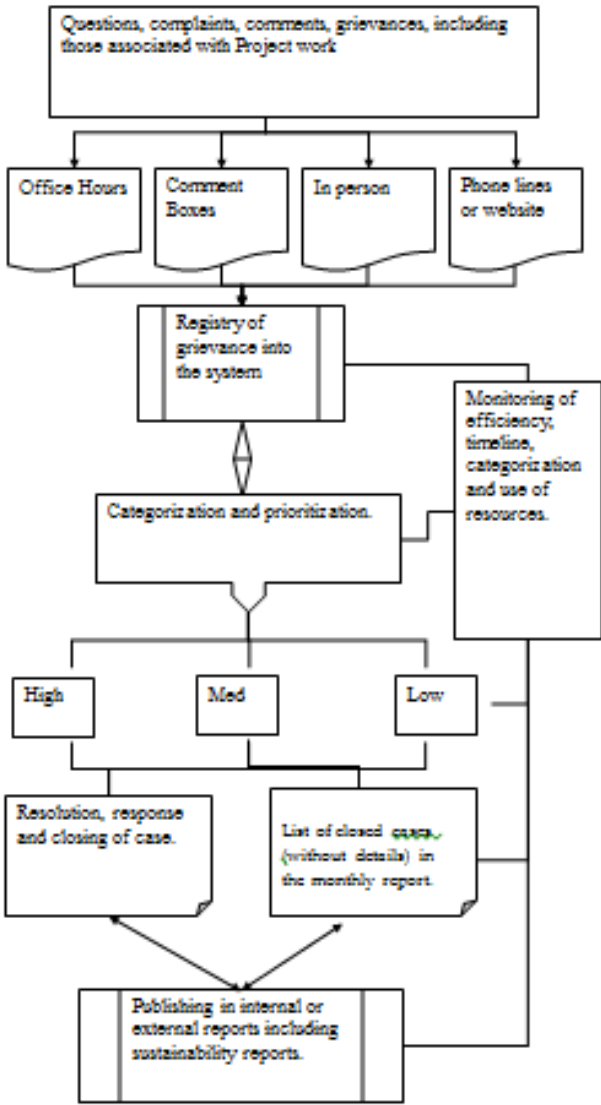
- Number of grievances registered (by week, month);
- Time in resolving grievances or complaints;
- Number of complaints or grievances by category (i.e. payment, treatment, damage etc.)
- Number of grievances not completed within the timeline
- Cases of re-incidence - when the same issues come up several times

Procedure

¹ The recommended period for grievances tracking is monthly. The resolution period for cases depends on the complexity of the grievance, but should ideally not exceed 90 days.

The flow chart pictured in Figure 5-1 below illustrates a suggested grievance management procedure.

Figure 5-1: *Grievance Procedure*



5.4 **PRELIMINARY FRAMEWORK FOR LIVELIHOOD RESTORATION**

While there are no anticipated physical resettlement activities, the Program may involve the temporary or permanent economic displacement of formal and informal enterprises, although due to a lack of information on the exact locations and types of interventions at the time of writing, the magnitude of this displacement is as yet unknown. This document introduces and presents a Preliminary Livelihoods Restoration Plan (PLRP) through which the IDB can evaluate and categorize the potential resettlement associated with this Project. The PLRP has been designed in order to provide a framework for the process

necessary to guarantee the reestablishment of the socioeconomic conditions of those people displaced as a result of the Project, with as much specific context as possible.

Once the final design is completed and a livelihoods census and engagement with Affected Communities to assess the number of affected businesses/individuals has been completed, it will be necessary to develop site-specific LRPs to appropriately manage and mitigate economic displacement.

Purpose

Some of the most significant impacts created by development projects can be those associated with economic displacement, which refers to “the loss of income streams or means of livelihood resulting from land acquisition or obstructed access to resources associated with a project”².

The purpose of a PLRP is to provide a framework to guide the Program in managing potential economic displacement impacts resulting from Project activities.

Scope

The PLRP is designed to maximize the likelihood of ensuring that any individuals economically displaced by Program activities have their socioeconomic conditions reestablished or improved. The tool is designed to determine the best course of action for analyzing and mitigating the potential risks or impacts, and to improve access to benefits of livelihood restoration activities based on the best available information.

At the time of writing, finalized project description information is not available and displacement-focused consultation and engagement activities have not taken place, meaning that a full understanding of the scope of activities has yet to happen. As such, this document is intended to determine the likely risks and impacts, the potential scale of the restoration, and the likely procedures through which compensation should be managed.

Definitions

Table 5-3 lists the most important technical terms used throughout this document. While in some cases there are multiple definitions for how these terms can be understood, this table references how these terms should be used in Program LRPs.

² IFC Handbook for Preparing a Resettlement Action Plan, 2002

Table 5-3: Definitions Used in the LRP

<i>Affected Person/ Group / Community</i>	Individuals or groups who will be directly affected by activities associated with a Program
<i>Area of Influence or Project Area</i>	The area likely to be affected by the Program, including all associated works and areas, as well as areas of unplanned impacts induced by the project.
<i>Compensation</i>	Payment in kind or in currency to which an affected individual or family is entitled.
<i>Customary Use</i>	A right to use that is established by custom (long-continued practices) rather than by law - often associated with indigenous groups and their use of land, routes or specific spaces. Squatters' rights to land are often considered as a result of their customary use.
<i>Cut-off Date</i>	The date at which point individuals or groups who have arrived in an affected area will no longer be considered eligible for compensation. This date usually coincides with the date that the livelihoods census is undertaken.
<i>Displacement, Economic</i>	A process through which individuals or groups lose access to their source of income or livelihood as a result of Program activities.
<i>Eligible Population</i>	The population (individuals or groups) who fall under the previously defined categories as requiring resettlement and/or compensation as a result of impacts due to Program activities. Categories will depend on relevant legislation or international standards and guidance.
<i>Expropriation</i>	The action through which a Government exercises sovereignty, appropriating property rights from an individual, family or group.
<i>Impacts, Project</i>	The socioeconomic, environmental and material effects directly or indirectly associated with the presence and actions of a process.
<i>Informal Settlement</i>	The term for a space that has been occupied by individuals, families or groups without the permission of the appropriate parties. Given that individuals will not have documentation which will provide evidence of their affiliation and dependence on land or assets, a particularly vulnerable group.
<i>Livelihood</i>	The means through which a person, family or group obtains and secures what they need to subsist (food, shelter, etc.).
<i>Plots</i>	A specific area of land owned or meant to be owned by someone/ group.
<i>Owners</i>	Those who have legal ownership of property.
<i>Renter</i>	An individual or family who pays for or has some other agreement or contract with the owner for the use of a given resource or property.
<i>Rehabilitation</i>	The reestablishment of a means of subsistence, living

	conditions, or social systems, amongst other things, usually through a resettlement support program.
<i>Right of Way</i>	A legal right to pass through land (ground or property) belonging to others.
<i>Stakeholder</i>	Individuals or groups who will see themselves affected for better or worse by the existence or lack of a Project. Internal stakeholders include employees and partners amongst others and external stakeholders include individuals or communities in the Project's area of influence, including those who may be resettled.
<i>Squatters</i>	Those who occupy property or land that does not belong to them and to which they have no legal rights. However, their rights to land are often considered customary rights.
<i>Vulnerable Groups</i>	Groups of people whose living conditions mean that negative impacts are felt to a greater magnitude than the general population, or whose access to benefit from positive impacts are limited. This group often includes single-parent homes, indigenous communities, people with disabilities, people without land-rights, the elderly, people who are dependent on their location for livelihood, amongst others.

Overarching Principles

The following principles guide this PLRP:

- Displacement should be avoided wherever possible;
- Where involuntary displacement is unavoidable, all people affected by it should be compensated fully and fairly for loss of assets;
- Involuntary displacement should be conceived as an opportunity for improving the livelihoods of the affected people and undertaken accordingly; and
- All people affected by involuntary displacement should be consulted and involved in the restoration planning process to ensure that the mitigation of adverse effects as well as the benefits of restoration activities are appropriate and sustainable.³

Vulnerability Criteria

Vulnerability is a state defined by an inability to claim or take advantage of benefits, or an increased likelihood or magnitude of experience adverse conditions or impacts. In this context, Vulnerable Groups are those who are more likely to feel the negative impact of a nearby project (traffic issues, dust, noise, vibration etc.), and/or an inability to experience benefits associated with a nearby project (employment, income etc.). Vulnerability is evaluated to

³ IFC Handbook for Preparing a Resettlement Action Plan, 2002;

determine the magnitude of the intervention necessary to mitigate and compensate the negative impacts associated with the Program.

Vulnerability is often associated with poverty or social status, although certain individual factors can exacerbate the vulnerability of a person or group. By virtue of some of the following factors, an individual can be more or less vulnerable due to: gender, ethnicity, age, physical or mental capacity, race, political or religious affiliation.

In the case of this Program, segments of the Affected Populations are likely to be vulnerable due to high levels of poverty or social exclusion. These could include:

- Women;
- People with undocumented, or informal land rights;
- Squatters and/or Occupiers;
- Informal business owners or users;
- Grey/Black market owners or users;
- People whose access to natural resources is affected.

It should be noted that based on the information available at the time of writing, it is not anticipated that there will be Indigenous individuals or groups likely to be impacted by the Project. If the baseline data collection indicates that there is Indigenous presence, then these individuals or groups must be added as a priority to the listing of vulnerable people or groups.

Implementation

Groups likely to be displaced in some way by Program actions need to be categorized in order to determine the level and type of support the Program would be responsible for providing. Compensation and rehabilitation programs should be developed based on the magnitude and significance of the impact felt by households as a result of resettlement activities.

While from time to time it is possible that compensation and rehabilitation could be considered on a case-by-case basis, it is helpful to have overarching guidelines establishing eligibility, so as to ensure the most effective and responsible use of resources available, and so as to minimize the potential rise of expectations on the part of community members.

Process for Displacement Consultation and Activities

Identification of Project-Affected Communities

The first step in the public consultation process is to identify all people affected by the Program (see Stakeholder Engagement Plan for further details). Once that has taken place, it is important to determine what adverse impacts there may be on their livelihoods associated with Program activities. In order to understand what specific impacts may be experienced, consultation should be carried out with local government, formal and informal community leaders, or other community representatives, both in the areas where communities will be displaced from, and in the host communities where people will be relocated to. The Program should consult with local leaders in both sets of areas about plans for a socio-economic survey and registration program in order to support in identifying those eligible for support associated with displacement and resettlement compensation.

General Program-Affected Persons and Affected Communities will typically include owners/occupiers/users of land likely to be acquired by the Program, who will experience economic displacement, as well as communities and individuals in the settlements in the general area of the Program, who will not be resettled or experience economic displacement, but may lose access to services that displaced individuals or businesses provided.

Other relevant stakeholders (such as regulatory bodies and NGOs, and interest groups) to the Program should also be identified, because of the importance of their involvement in the engagement and consultation process.

In order to identify the specific Affected Populations, the following should be undertaken:

Thematic mapping should be developed using existing maps and baseline information to identify populations, infrastructure, cultural property, and land use patterns in the Program Area. This information serves as an important starting place for planning further resettlement consultation activities.

A **census** should be undertaken that enumerates and registers Affected Populations and their location. Through this step, the Program establishes a list of eligible beneficiaries of the livelihood restoration process, and is protected from spurious claims by those seeking benefits. This census also provides a base understanding and framework for any additional socioeconomic data collection required, and a baseline for future monitoring and evaluation. Data should be collected on each individual or business' key economic activities; income; and social networks amongst others. Enumerators should be clear on the specific plans for compensation, including the fact that lack of legal land title does not disqualify people from livelihood restoration assistance.

All interactions should consider **potential vulnerabilities** of Affected Populations including female or elder-owned businesses, people with

disabilities, minorities, and ensure that full access to the process is provided accordingly.

An **inventory** should be collected of any assets pertaining to businesses or economic activities that will be lost or affected. Privately-owned assets could include land use/land capability, shops, stalls or other structures, and other types of private non-moveable assets such as fencing. In assigning value to these assets, it is critical that the Program consults with the Affected Population regarding the methods and formulas for assigning value to assets lost and income forgone as a result of the Program. These inventories should be countersigned by the asset owners.

Plan for Disseminating Information

Critical to the success of the Program is that the Livelihood Restoration Plan is prepared through a process of public consultation with all interested and affected parties. In order to achieve this, affected populations and stakeholders should be informed of the availability of compensation for lost assets, their eligibility for compensations, assistance around economic resettlement, and redress of any associated grievances or feedback.

To achieve this, public consultations should be held to present the information included in the LRP and to collect ideas and concerns about the LRP and its implementation. In doing this, the Program should make Affected Communities aware of their rights around resettlement, and should develop options for resettlement through consultation with Affected Peoples. As well, copies of the LRP should be made available to all stakeholders.

Stakeholders in the Program area should be made aware of opportunities to attend public consultation meetings where they can learn about the details of the Program. These meetings should be held with communities, community organizations, local government departments and agencies, and be ongoing throughout the Project cycle, including during the planning, implementation, monitoring and evaluation of compensation payments, livelihood restoration activities, and settlement.

During these meetings, stakeholders should be informed of the Program, its planned activities, and plans for livelihood restoration and compensation. These meetings should also provide stakeholders with opportunity to ask questions and provide insights into potential impacts or areas of sensitivity. The sessions should be widely advertised, via signage, word-of-mouth, and announcements at community organizations and events. They should (a) provide information on the Program and the steps involved in resettlement, and (b) allow for attendees to ask questions and voice concerns. They should also indicate specific steps to be taken for stakeholders who will be physically and economically displaced.

Meetings should be documented via meeting minutes, photographs and publically disclosed.

A consultation log should be developed and used to record the date, location, host organization, type of settlement, issues discussed, and action taken, for all consultations undertaken regarding livelihood restoration activities.

Specific activities involved in the dissemination plan include the following:

- Disclosure of Livelihood Restoration Plan, Stakeholder Engagement Plan, and Environmental and Social Management Plan mitigation measures;
- Procedures for addressing grievances through a Grievance Mechanism;
- Land, property, and assets evaluation procedure;
- Process and rates for compensation;
- Inventory and valuated of properties and assets;
- Assistance with resettlement;
- Timeline for in-kind distribution of land;
- Salvage of assets from the Program Area; and
- Provision of compensation or disbursement of assets and land.

Design of Income Restoration and Development Initiatives

The process should be conducted in conjunction with additional focus groups to develop parameters for compensation of Affected Populations and to design income restoration and development initiatives. This analysis should be undertaken in consultation with Affected Populations regarding the mitigation of effects and promotion of development opportunities. These interventions must be designed in consultation with local authorities and community-based organizations, and should include implementation schedules, programs for consultation and participation, dispute resolution mechanisms, budgets, and schedules for monitoring and evaluation, as well as mechanisms for correcting any issues that arise during monitoring and evaluation.

5.5

COMMUNITY PARTICIPATION PROGRAM

Separate from, but related to, the Project's Stakeholder Engagement Plan, the Project will also develop a community participation program as funding is secured and design progresses. The community participation program allows for the needs of Affected Communities and beneficiaries to be taken into consideration and provides a method for strengthening local capacity.

Informed participation is a more intensive and active form of consultation. Typically, participation involves a more in-depth exchange of views and information, leading to joint analysis and decision-making. In the context of this Project, which has specific development outcomes, an increased level of

involvement from communities and beneficiaries should generate a higher sense of shared ownership in the project and its outcomes.

The more a particular stakeholder group is materially affected by a component of the Project (e.g. CH&PA housing scheme residents), the more important it is for them to be not just properly informed but also encouraged to participate in matters that have direct bearing on them, including development benefits and opportunities, proposed mitigation measures, and participation in monitoring issues.

Public participation in the design of infrastructure can help ensure that the needs of communities are taken into account which further ensures the viability of successful and sustainable project components. Community participation can also lead to the development of capacity building programs (e.g. training women in construction skills, enhancing outreach efforts for civil society etc.)

Specific methods for engendering community participation should be considered in the Stakeholder Engagement Plan (Section 5: Ongoing and Future Stakeholder Outreach).

5.6 **GENDER EQUALITY PROGRAM**

The IDB's Gender Policy seeks to ensure that the gender perspective is applied systematically across development interventions (gender mainstreaming or interventions directly investing in gender equality). In order to effectively mainstream gender across the IDB, attention to the goal of gender equality needs to be central to the design, implementation, monitoring, and evaluation of the IDB's interventions. Therefore, it is the intention of the Program to create a program that integrates gender mainstreaming at the onset of the Program's lifecycle.

The Policy recognizes that the pursuit of equality requires actions aimed at *equity*, which implies providing and distributing benefits and/or resources in a way that narrows the existing gaps, while recognizing that these gaps can harm both women and men. The *empowerment of women* is understood to mean expanding the rights, resources, and capacity of women to make decisions and act independently in social, economic, and political spheres. *Gender mainstreaming* is the process that seeks to have gender equality and the needs of women and men be heard and addressed in the design, implementation, monitoring, and evaluation of the interventions.

As the project design progresses, the Program will introduce measures to prevent, avoid, or mitigate any adverse impacts and/or risks of gender-based exclusion, including but not limited to:

- Applying the principles of nondiscrimination, equal treatment, and equal pay for equal work, and will seek access to project-derived economic opportunities and benefits, including paid work, training, credit, or business opportunities for men and women.
- Recognizing women's ownership rights regardless of marital status and will adopt measures to facilitate their access to the documents they need to exercise this right.
- Organizing volunteer work or community contributions (if necessary) to provide the conditions for equitable participation of men and women in the identified tasks.
- Introducing conditions that restrict the participation of women or men in project activities and benefits based on pregnancy, maternity/paternity leave, or marital status.
- Avoiding unintended negative consequences for gender equality in its operations (i.e., applying gender safeguards).

The Program understands that poverty, social organization and social constructs in the Program area create vulnerabilities for not only women and girls, but also for young men that will need to be taken into consideration (e.g. urban centers create heightened challenges for young men in terms of social and living conditions.)

Therefore, the Program will identify and assess gender inequalities in the region of operation and develop tailored strategies to mitigate negative impacts, and increase the benefit of positive impacts for all stakeholders. This is typically accomplished through the gender mainstreaming which includes a Gender Issue Assessment, Stakeholder Engagement and Gender Sensitive Impact Assessment, as described below.

Gender Issues Assessment

This aspect of the issues assessment is intended to identify the specific areas, gaps or constraints where the experiences and contexts of women and girls differ from those of men and boys. This is in part due to identified social vulnerability (to be defined in greater detail in the Environmental and Social Assessment) as well as important differences in formal and informal access, use and maintenance of the housing structures and infrastructure to be generated by the Program. This analysis will identify specific areas that will need to be considered as the Program progresses.

The difference in the experiences lived by men and women in the Program area are important to understand given that these experiences have the capacity to affect the potential vulnerability and resilience of individuals or groups. In the case of Program-related development, vulnerability means a diminished capacity to anticipate, cope with and recover from negative changes in their surroundings. Similarly, vulnerability implies a diminished capacity to take advantage of or engage with positive changes in their surroundings (housing and infrastructure).

In order to understand the most project-relevant differences in how men and women interact with their surroundings, a scoping tool, such as in Table 5-4, identifies specific areas where men's and women's experiences are practically different. These thematic areas serve as the framework for all further gendered analysis in this document, and identify the priorities which must be considered while developing and implementing adequate impact avoidance, minimization, mediation and compensation plans associated with the Project.

Table 5-4: Scoping for Gender Issue Assessment

Thematic Area	Example:
Political	Differing access to making their voices heard and reaching leadership positions, in part due to differing schedules and responsibilities, in part due to administrative differences such as access to identification or documentation.
Economic	Differing access to income, labor markets, resource and livelihood opportunities and resource access. This is due in part due to broadly differing asset ownership or tenure, differences in forms and amounts of compensation, as well as a say in the way income is spent.
Legal	Difference in access to legally protected rights including differences in access to land rights. This is in part due to inadequate laws, cultural practices regarding inheritance, communal or familial land, and cultural differences regarding how familial structures are managed in case of marriage, separation/divorce and/or death of spouse.
Communicatory	Differences in means by which an individual can communicate or be communicated with. This is due in part with the social norms associated with education and access to communal information through media. This also intersects with differences in schedules and responsibilities between sub-groups.
Health and Safety	Differences particularly regarding physical and sexual safety, as well as differences in physical health associated with access to healthcare or employment which does not undermine health.
Social	Difference in flexibility regarding culturally constructed roles and norms, particularly in the context of vulnerability or

	insecurity. This thematic area intersects broadly with the other areas described above, particularly regarding access and use to public services and opportunities.
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Stakeholder Engagement and Communication

The Program SEPs will include specifically gendered Stakeholder Engagement Communication approaches with the aim to:

- Ensure women and girls are ensured access to community-wide engagement, consultation and disclosure activities, taking into consideration various types of communication methods;
- Include men in the participatory meetings, to raise awareness to and address the gender gaps;
- Incorporate a complete and robust understanding of all relevant risks and impacts as the baseline for all management plans;
- Promote the positive impact of management and compensation plans by ensuring its relevance, efficiency and viability to all community members, including women and girls prior to implementation;
- Provide the framework for stakeholder involvement in identifying appropriate processes for compensating economically displaced households, including those headed by single (including those separated/divorced or those whose spouse has died), and those who do not have legal claim to land or property in question.

Gender Sensitive Impact Assessment

As determined through earlier stages in the process, the potential impacts associated with Program activities may differ greatly based on the needs and vulnerabilities of different stakeholders, and one of the largest subgroups within the host-community, are women and girls. These individuals could represent up to half the population of the Program area, so it is important that their specific needs or concerns are included in the overall impact assessment through analysis of gender disaggregated data, where available. Together with the contents of the Gender Issues Analysis and the Stakeholder Engagement Communications Approach, the Gender Sensitive Impact Assessment is designed to provide more detailed information needed to guide interactions with relevant host communities.

Examples of Project activities, potential associated impacts and gendered mitigations and enhancements are provided below in Table 2.

Table 2: Gender Sensitive Impact Assessment Examples

Project Activities	Potential Associated Impact	Gendered Mitigations/Enhancements
Permitting, ROW Acquisitions	Integration of men’s and women’s concerns into the project design	Program shall: <ul style="list-style-type: none"> • Ensure that women and girls are provided a safe space where they can fully participate. • Establish hours and locations of meetings that allow women to participate. • Identify women to be invited and best forms of outreach with individuals who know these women.
	Exclusion of vulnerable groups from consultations may lead to strife	Program shall: <ul style="list-style-type: none"> • Develop specific plans for addressing women and girls who do not have legal claim over resources used for livelihood, and for identifying these individuals • Develop employment opportunities that prioritize equal opportunities for women and girls.
	Community agitations over land disputes or impacts to land use	Program shall: <ul style="list-style-type: none"> • Evaluate users of roads at different times including pedestrian traffic by women and children and minimize transportations during that time; • Establish codes and training for staff prohibiting providing transportation or rides to community members to minimize perceptions of inappropriate behavior or additional risk to women and children. • Establish a protocol to avoid the spread of venereal diseases, HIV AIDS and a prostitution network.
Transport of staff or materials	Interference with other road users along infrastructure upgraded routes	Program shall: <ul style="list-style-type: none"> • Evaluate users of roads at different times including pedestrian traffic by women and children and minimize transportations during that time; • Establish codes and training for staff prohibiting providing transportation or rides to community members to minimize perceptions of inappropriate behavior or additional risk to women and children. • Establish a protocol to avoid the spread of venereal diseases, HIV AIDS and a prostitution network.
Recruitment of Labor	Employment opportunities arising from recruitment of workers	Program shall: <ul style="list-style-type: none"> • Establish training schemes to ensure women have the basic skills necessary for employment • Ensure requirements for contractors explicitly state recruitment of women, as well as equal amount and form of pay, OHS support and anti-

Project Activities	Potential Associated Impact	Gendered Mitigations/Enhancements
		discrimination/ abuse contracts.
Construction	<p>Business Opportunities for local contractors through sub-contracting activities</p> <p>Local Supply support services from road side supply markets and shops</p>	<p>Program shall:</p> <ul style="list-style-type: none"> • Provide support for female contractors to obtain any certification or formal registration needed • Alter schedules or timelines allowing women entrepreneurs to provide services at convenient times (deliveries during the day etc.) • Train construction contractors to raise awareness to sexual harassment and discrimination. <p>Establish a protocol to avoid the spread of venereal diseases, HIV AIDS and a prostitution network.</p>

Indicators for monitoring Program results

The Program will ensure that indicators are used to measure progress in implementing this Gender Equality Program, including but not limited to:

- Program monitoring reports that include specific gender-related results in their results matrix (number and percentage, establishing a baseline and targets)
- Program monitoring reports that disaggregate project beneficiaries by sex (number and percentage, baseline and targets)
- Disaggregation by sex of Program beneficiaries, which will be required in those operations that record information on the beneficiary population.
- Indicators that measure IDB's added contribution to regional objectives and its corporate effectiveness to be sex-disaggregated.

5.7

INSTITUTIONAL ARRANGEMENTS AND RESPONSIBILITIES UNDER THE ESMF

The Ministry of Communities, through the Central Housing and Planning Authority (CH&PA), will be responsible for the execution of the urban development components of this Program. The operation and maintenance of the works are the responsibility of the City Council, which is supervised by a Direction/ Division under CH&PA, Department of Communities.

The City Council will be responsible directly for implementation in partnership with the CH&PA, and IDB will provide oversight, of the:

- Environmental and Disaster risk assessment and monitoring
- Stakeholder Engagement Plan and Grievance Mechanism
- Gender Equality Program
- Livelihood Restoration Plan

Consultants will be responsible for the development of the required Environmental and Social Impact Assessments, Permitting, and Management Plans, with direct supervision from IDB.

Contractors will be responsible for Project-related mitigations and monitoring with guidance provided by CH&PA.

Furthermore, IDB will be responsible for capacity building to ensure all responsibilities under the Environmental and Social Management Framework are completed to satisfaction.

As the Project progresses, responsibilities for mitigation and monitoring will be defined along with arrangements for information flow, especially for coordination between agencies, enforcement of remedial actions, monitoring, training, financing, and reporting.

5.8

PLAN TO REINFORCE INSTITUTIONAL CAPACITY OF THE EXECUTING AGENCY

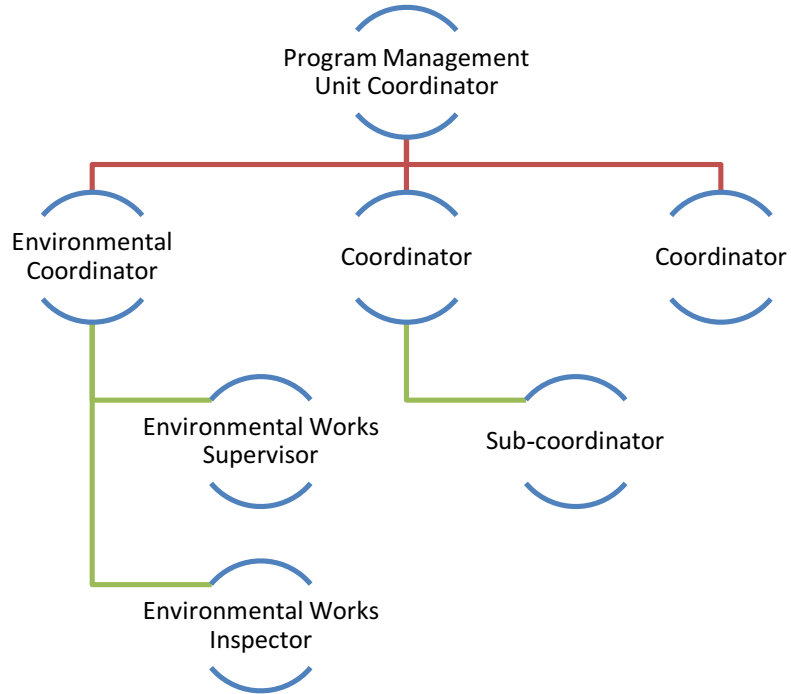
As the Project progresses, IDB will review the authority and capability of the executing institutions and will recommend capacity strengthening activities (e.g. organizational arrangements; appointment of key staff and consultants) where necessary. Currently \$2M of the Program loan is earmarked for institutional strengthening and capacity building within the CH&PA, which could include support for the implementation of the Environmental and Social Management Framework tasks.

The management and supervision of the programs should take place considering the following positions:

- 1 environmental coordinator with experience in the implementation of environmental management programs, located in Program Management Unit : eventually, this role can be supported by specialists in stakeholder engagement and/or environmental education during the implementation period of relevant programs;

- 1 Environmental Works Supervisor;
- 1 Environmental Works Inspector, contracted by the construction contractor.

Figure 5-2: Recommended Staffing for PMU



While some activities will be carried out through the hiring of consulting firms that will support the CH&PA, supervision of all contractors to ensure adequate progress and performance will also be performed.

Specifically, the Program is also seeking funding to strengthen of the capacity of the Works Service Group (WSG), the executing agency for the transportation component of the Program, in the areas of transportation planning and evaluation, project management and monitoring, and environmental and social safeguards. The specific activities will include training, provision of technical equipment and computer software and hardware. Administrative, auditing, monitoring and evaluation expenses will be financed through Program funds.

Strengthening the capacity of the Ministry of Communities, as well as that of NDCs for the ongoing management and maintenance of local infrastructure assets, will also be critical to ensure the long term sustainability of the Program.

Activities to promote and sustain community mobilization will be a constant feature of the infrastructure upgrading activities and members of the target communities will receive training in basic construction skills and infrastructure maintenance through investments under Component 3 (institutional strengthening).

Other funding for implementation support and institutional strengthening will be developed based on specific Program components, such as:

- One of the primary Program benefits is the development of a more comprehensive urban development and mobility program which requires a more integrated approach to address the housing and basic infrastructure needs of low-income populations. The Program has the potential to ensure that the development of such an integrated approach can be utilized by the relevant institutional authorities in the future for other development initiatives and programs.
- In the past, because basic infrastructure in CH&PA housing estates was historically developed incrementally, the Project will include infrastructure upgrades to improve the living conditions of low-income households concentrated in the Georgetown area. By strengthening the government's capacity in holistic and fully integrated urban planning, the Program has the potential to create lasting sustainable development programs which can be used in the future.

The Program will seek to identify such opportunities throughout the Program lifecycle.