

**Commonwealth of Dominica  
Dominica Geothermal Risk Mitigation II Project  
(P179845)**

**Draft  
ENVIRONMENTAL AND SOCIAL  
COMMITMENT PLAN (ESCP)**

**October 30**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Commonwealth of Dominica (the Recipient) shall cause the Dominica Geothermal Development Company (DGDC), to implement the Dominica Geothermal Risk Mitigation II Project (the Project) as set out in the Financing Agreement and the Project Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreement(s).
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient and the Dominica Geothermal Development Company Ltd (DGDC) and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Minister of Finance. The Recipient and DGDC shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association jointly with the Project Reports with the timeframe specified in Section II to Schedule 2 of the Financing Agreement	DGDC
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association</p>	DGDC
C	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association.</p>	Submit the monthly reports to the Association upon request and as annexes to the reports to be submitted under action A above.	DGDC
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain qualified staff and resources, and hire/appoint additional staff, as needed, to support management of ESHS risks and impacts of the Project, including an environmental specialist, a resettlement specialist, and a community liaison officer, under terms and conditions acceptable to the Bank.</p>	Maintain qualified staff as set out in the Project Agreement. Appoint/hire the environmental specialist, a resettlement specialist, and a community liaison officer, no later than 60 days after the Effective Date, and thereafter maintain these positions throughout Project implementation.	DGDC
1.2	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>Adopt and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the Project, consistent with the relevant ESSs.</p>	Adopt the ESIA and ESMP prior to the launching the bidding process and thereafter implement the ESIA and ESMP throughout Project implementation.	DGDC
1.3	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia ESIA, ESMP, and other relevant E&amp;S measures, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p>	DGDC
1.4	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	DGDC
1.5	<p><b>MONITORING OF WORKS</b></p> <p>Engage an independent E&amp;S Monitoring Consultant to verify compliance with environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, implementation of E&amp;S instruments, stakeholder engagement activities, and functioning of the grievance redress mechanism.</p>	Within 30 days of contractor mobilization and maintained throughout Project implementation.	DGDC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.6	<p><b>ASSOCIATED FACILITIES</b></p> <p>Cause the Private Investor to ensure that the Domestic Geothermal Power Plant is carried out in accordance with the Performance Standards and the Domestic Geothermal Power Plant Environmental and Social Instruments (i.e. ESIA, ESMP and RAP prepared for said Domestic Geothermal Power Plant), as further specified in the Financing Agreement</p>	Incorporate relevant requirements into the agreement between Recipient/DGDC and the Concessionaire	Recipient and DGDC
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Adopt and disclose the LMP no later than 30 days after the Effective Date, and thereafter implement the LMP throughout Project implementation.	DGDC
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Maintain a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Maintain and operate labor GM throughout Project implementation.	DGDC
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>1. Incorporate the OHS measures into bidding documents and contracts with consulting firms, contractors and supervision firms.</p> <p>2. Ensure that the OHS measures specified are implemented at each of the worksites</p>	<p>1. Prior to commencing the corresponding bidding process of each works and thereafter incorporate in the respective contracts.</p> <p>2. Throughout implementation of each work site.</p>	DGDC
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Implement resource efficiency and pollution prevention and management measures as set out in the ESMP prepared under action 1.2 above.</p>	Same timeframe as for the implementation of action 1.2	DGDC
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Implement measures to manage traffic and road safety risks as set out in the ESMP under action 1.2 above.</p>	Same timeframe as for the implementation of action 1.2	DGDC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Manage specific risks and impacts to the community arising from Project activities including, inter alia behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMP prepared under action 1.2 above.	Same timeframe as for the implementation of the ESMP	DGDC
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT PLANS</b> Finalize and implement the Abbreviated Resettlement Action Plan (ARAP) for the Project consistent with ESS5.	The ARAP shall be finalized no later than 30 days after the Effective Date and implement the ARAP prior to taking possession of any land and related assets, or causing any resettlement impacts	DGDC
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> Implement the Biodiversity Management Plan (BMP), in accordance with the guidelines of the ESIA/ESMP prepared for the Project, and consistent with ESS6.	Same timeframe as for the implementation of action 1.2	DGDC
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
ESS7 is not relevant			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.2	<b>CHANCE FINDS</b> Implement the chance finds procedures as described in the ESMP of the Project.	Implement the procedures throughout Project implementation	DGDC
<b>ESS 9: FINANCIAL INTERMEDIARIES</b> [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
ESS9 is not relevant			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> Finalize, submit to the Association for approval and disclosure, and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	No later than 30 days after the Effective Date, and thereafter implement the SEP throughout Project implementation.	DGDC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Update, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	At the same time as 10.1 and throughout project implementation.	
<b>CAPACITY SUPPORT</b>			
CS1	<p>Training shall be provided to the project staff on:</p> <ul style="list-style-type: none"> <li>• Stakeholder engagement and Grievance Mechanism</li> <li>• ESF requirements</li> <li>• Environmental, Social, Health and Safety</li> <li>• Occupational Health and Safety</li> </ul>	No later than 120 days after the completion of action 1.1. Training shall continue throughout Project implementation.	DGDC
CS2	<p>Training to be provided to Project contractors/workers on:</p> <ul style="list-style-type: none"> <li>▪ Environmental and social requirements including ESHS requirements</li> <li>▪ Waste management</li> <li>▪ Occupation Health and safety for the workforce including emergency preparedness and response</li> <li>▪ Community health and safety</li> <li>▪ SEA/SH risk management</li> <li>▪ Stakeholder engagement and Grievance Mechanism</li> <li>▪ Implementing the Contractor-ESMP</li> <li>▪ E&amp;S monitoring and reporting</li> </ul>	Prior to the start of works.	DGDC