Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 06/01/2023 | Report No: ESRSC03602

BASIC INFORMATION

A. Basic Operation Data

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P179845	Investment Project Financing (IPF)	Dominica Geothermal Risk Mitigation II	2024
Operation Name	Dominica Geothermal Risk Mitigation II Project		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Dominica	Dominica	LATIN AMERICA AND CARIBBEAN	Energy & Extractives
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
The Government of the Commonwealth of Dominica - Ministry of Finance	Dominica Geothermal Development Company	28-Aug-2023	08-Nov-2023

Proposed Development Objective

The Project Development Objective is to integrate geothermal electricity capacity and strengthen the resilience of the national grid in Dominica.

Financing (in USD Million)	Amount
Total Operation Cost	40.00

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

No

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

The proposed project would finance the first of two phases of the transmission network expansion required to support the development of the DGPP. In the face of limited financial resources for investment in the electricity system, meeting the needs of Fond Cole is the higher priority, because it serves the greater part of national demand in the southern part of the island. Hence the first phase entails construction of new 33 kV and 69 kV transmission lines and associated substations to evacuate electricity generated at the DGPP to Fond Cole. The second phase would extend the 69 kV transmission line from Fond Cole substation to Sugar Loaf substation in the north of the island; it would be financed by a follow-up investment project. The proposed project will achieve its development objective by expanding the transmission system's capacity and reach, building the capacity of DOMLEC to operate the expanded system, and supporting the Independent Regulatory Commission (IRC) to foster increased uptake of renewable energy. The project will finance goods, works, and consultant services in support of these goals. The proposed project will have two components: (a) Component 1: Transmission Network Development for Integration of DGPP. This component will support the construction of new transmission lines and substations connecting the DGPP with Fond Cole. Network expansion will take place in four segments: (i) a 33 kV line of 0.5 km, connecting DGPP to Laudat substation where electricity will enter the DOMLEC grid; (ii) a 33 kV underground transmission line of 10.6 km, connecting Laudat substation with Fond Cole substation via New Trafalgar and Padu substations (iii) a 69 kV overhead transmission line of 7.6 km, between Laudat and Fond Cole substation; and (iv) construction of two new 69/33/11 kV substations at Laudat and at Fond Cole; and upgrading the New Trafalgar and Padu substations from 11kV to 33/11 kV. A stock of emergency spare parts will be financed to allow efficient and fast response to future extreme weather events. During preparation, designs that would increase the resilience of the network to future hurricanes will be explored further and incorporated into the final design. These include routing transmission lines underground and avoiding areas at risk of landslide or flooding. Other resilience and adaptation measures such as system redundancy, rapid system restoration methods and optimum levels of spare parts holdings will also be considered. (b) Component 2: Technical Assistance and Project Implementation Support. This component will finance technical assistance to: (i) improve the capacity of DOMLEC to operate and manage the 33kV and 69kV networks sustainably, a more complex task than managing the present 11kV system; (ii) technical assistance and capacity building for regulatory framework development, grid development and renewable energy resource assessment and (iii) support project implementation by DGDC.

D. Environmental and Social Overview

D.1. Detailed operation location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The government has adopted a National Resilience Development Strategy (NRDS) aimed at transitioning to a more diversified and greener economy with one of the growth poles as renewable energy. Dominica's electricity system relies primarily on a fleet of aging diesel generators resulting in high electricity costs and unreliable supply undermining Dominica's competitiveness. In 2021, installed generation capacity owned by the national utility - Dominica Electricity Services Limited (DOMLEC) was 25.53 megawatts (MW). 74 per cent of the generation capacity (18.89 MW) came from two diesel power plants located at Fond Cole in the southeast outside Roseau, and Sugar Loaf in the northwest outside Portsmouth. The remaining 26 per cent or 6.6 MW is derived from a cascade of three small run-of-the-river hydro plant in the Roseau Valley. There is also an estimated 15MW diesel self-generation.

This project in conjunction with the Dominica Geothermal Risk Mitigation Project (DGRMP) aims to diversify Dominica's domestic power generation mix and demonstrate the potential of larger development of the geothermal

resource. The project will entail the construction of new transmission lines and construction and upgrade of substations connecting the Domestic Geothermal Power Plant (DGPP) with the national electric system.

The Project activities will be carried at the Roseau Valley, to the southeast of Laudat. The Roseau Valley is characterized by landscapes such as tropical and mountain forests, urban villages, and connecting roads. The DGPP is situated close to the Morne Trois Pitons National Park, home to one of the last largely intact forest areas remaining in the insular Caribbean, rich in biodiversity. Much of the original natural forest vegetation in the project area have been altered due to the impacts of human induced activities and tropical cyclones. Human activity, such as the clearance of natural forests for agriculture, small-scale timber harvesting, charcoal production, firewood collection, livestock grazing, construction of residential homes, and installation of hydroelectricity infrastructure, has altered the species composition of the habitat and by extension, its primary ecological functions. The aquatic sub-habitat close to the DGPP comprises of a network of relatively small seasonal ravines which carry surface runoff downslope, whenever it rains.

The proposed 69 kV overhead transmission line originating at the DGPP will follow the existing utility corridor for the non-operational 11 kV overhead line that traverses the largely unpopulated forests and ridgelines, leading down the valley to Fond Cole. The 33 kV line will mostly follow the road network leading up from Roseau Valley via Laudat hydropower station and to Fond Cole. In some instances, the line will traverse the river valley. Underground cables will be installed along the public roads. The cables will be installed near the existing right of way of Laudat's hydropower pipeline.

Two substations - at DGPP and at Fond Cole, will be built on land owned by the Government of Dominica and DOMLEC respectively. There is no land acquisition associated with these two new constructions or with the upgrades to the Trafalgar and Padu substations which are on land owned by DOMLEC. There will however be ESS5 impacts arising from the underground cables between Geothermal, Laudat and Fond Cole.

D. 2. Borrower's Institutional Capacity

Dominica Geothermal Development Company Ltd (DGDC) will be the project implementing agency. DGDC is also responsible for the Dominica Geothermal Risk Mitigation Project (DGRMP – P162149), which is currently under the implementation. DGDC is a private company in which the Government currently owns 100% of the shares. The Government's role is as shareholder, equity provider and lender to the company, alongside undertaking standard Government functions. At present, DGDC is the implementing agency for the on-going DGRMP (P162149). Regular Environmental Health and Safety monitoring is being conducted at the construction sites by DGDC and their E&S supervision consultant under DGRMP. Based on the site visits undertaken by the Bank team, discussions, and reports received from DGDC, the overall environmental and social performance rating of the DGRMP is considered satisfactory.

There are eight permanent staff members at DGDC, including one E&S Officer. There also is a Community Liaison Officer who is responsible for community engagement and the grievance mechanism. In the ongoing DGRMP, both owner's Engineer and contractors have E&S officers on site. During project preparation, the adequacy of staffing at DGDC will be assessed and strengthened particularly if the construction of the geothermal plant under the ongoing DGRM Project is implemented simultaneously with this project. The relevant staff at DGDC have received the ESF

training and Incident Response and Reporting training provided by the Bank and continue to benefit from continued engagement with the Bank.

DOMLEC will be responsible for the operation and maintenance of the new transmission assets after their completion. The company is structured as a vertically integrated utility in the generation, transmission, and distribution of electricity. From March 2022, the company has become majority owned by the GoCD, with 52% and Dominica Social Security with 20%. The remaining 28% stakes are owned by private actors, mainly Dominicans. The company is overseen by the Independent Regulatory Commission (IRC). DOMLEC has no experience in operating the network at higher voltage levels than 11 kV, nor of geothermal electricity. It would thus need to build its human resource and skill sets during the project implementation so that it is ready to receive and operate the 33 kV and 69 kV transmission lines and substations built by the Project.

DOMLEC has 3 Health, Safety and Environment officers (one senior and two junior officers). Additional capacity building measures will be assessed during project preparation under the technical assistance activities (Component 2) especially related to liaison with the community. Since DOMLEC does not have prior experience in managing higher voltage lines, the Health, Safety and Environment officers will also be required to train on (i) occupational health and safety, (ii) community health and safety, (iii) wildlife issues related to higher voltage lines.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) — Substantial

Environmental Risk Rating — Substantial

The environmental risk rating is considered Substantial due to (i) the anticipated occupational and community health and safety risk during construction (e.g. working at heights and difficult terrain); (ii) traffic management issues related to transporting equipment and materials through residential areas and narrow winding roads; (iii) potential impacts on biodiversity including the possibility of bird collisions; and (iv) institutional capacity of DGDC to supervise and monitor the DGRMP (which has a Substantial E&S risk rating) and DGRMP II if both are implemented simultaneously. The potential environmental, health and safety impacts related to the construction of the transmission lines and upgrade and constructions of the substations include noise, water, and air pollution; occupational health and safety; hazardous and non-hazardous waste management, including construction waste management during excavation; traffic management among others. These are likely to be short-term and reversible that would be addressed through mitigation measures incorporated into the Environmental and Social Management Plan (ESMP) in line with good international industry practice (GIIP) delineated in the WB Group General Environmental, Health and Safety (EHS) Guidelines and Guideline for Electric Power Transmission and Distribution. The Terms of Reference (ToRs) for the TA activities will be reviewed to ensure environmental and social requirements are included. The environmental risk rating will be further assessed during preparation and will be reviewed periodically throughout project implementation to ensure it continues to accurately reflect the level of risk.

Social Risk Rating — Moderate

The Social Risk Rating is considered Moderate due to the ESS5 impacts which are anticipated to be small-scale and are not expected to involve the physical displacement of people. These impacts relate to assets such as crop and tree

damage and livelihoods impacts which are expected to occur during the construction phase and for which the PIU has some experience in handling according to World Bank requirements. There is some known limited land acquisition for a short stretch of underground cable, in addition easements or similar arrangements which may be needed for right of ways during the operation and maintenance phase will be identified during the ESIA. To date, the required social risk mitigation actions are being well implemented. In order to assess and address the impacts from the creation/expansion of access roads and right of ways for the overhead transmission lines and underground cables, a social consultant has been engaged by DGDC to develop a Resettlement Action Plan. This also includes Households surveys. Some early consultations have been held with impacted communities with no significant issues being raised. A Stakeholder Engagement Plan (SEP) is also under preparation, which will define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. It can be mentioned here that DGDC has established a functioning grievance redress mechanism (GRM) under the first phase of the project i.e., Dominica Geothermal Risk Mitigation Project (DGRMP – P162149).

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating Low

SEA/SH risk rating has been assessed as low risk using the major works assessment tool. Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) risks are considered low due to the nature of Project activities which are not expected to involve significant labor influx or interactions with community members. A list of available GBV services, including contact information will be included in the SEP, and sample of Code of Conduct will be included in the Labor Management Procedure. Direct and contracted workers will be required to sign a workers' code of conduct, including provisions on SEA/SH.

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

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Operation:

This standard is relevant. Component 1 will support the construction of new transmission lines and upgrading and construction of substations connecting the DGPP with the national electric system. Of the 7.6 km of transmission line from the DGPP to Fond Cole substation, 6.5 km will be over head and 1.1 km will be underground. Of the 10.6 km transmission line, connecting DGPP via New Trafalgar and Padu substations to Fond Cole substation, 0.25 km will be overhead and the remaining 10.3 km will be underground. The cables for the transmission line from the DGPP to Laudat (0.5 km line) and initial sections of DGPP to Fond Cole and DGPP to Trafalgar will be installed near the existing right of way of Laudat's hydropower pipeline. The rest of the underground cables will be mostly installed along public roads. Two new substations will be constructed – at DGPP and at Fond Cole; and the substation at Trafalgar and Padu will be upgraded.

Currently, an Environmental Consultant and a Social Consultant, hired by the DGDC under the DGRMP are carrying out the environmental and social impact assessment (ESIA) and preparing a resettlement action plan (RAP) for the proposed transmission network (covering four segments) and substations based on the Terms of Reference (ToR) approved by the Bank. The ToR was prepared considering the earlier completed feasibility study and on-going the detailed study work. The consultations for the E&S instruments preparation include relevant authorities, NGOs, and other stakeholders who may provide relevant inputs to the project design. The consultants will deliver an ESIA

including environmental and social management plan (ESMP) and a separate RAP covering the proposed transmission network (four segments) and substations. The ESIA/ESMP will include a Biodiversity Management Plan given the potential direct and indirect environmental impacts on the West Coast Shrub Woodland (key biodiversity area) and the Morne Trois Pitons National Park (UNESCO World Heritage Site).

Land acquisition is currently not expected for the construction of the substations, this construction however may give rise to small-scale impacts to crops, trees, and livelihoods. The construction of lines, operation and maintenance of the substation and lines may require easements or other similar arrangements with land owners and users. All of these potential impacts are currently being assessed through an ESIA and RAP. For the underground cables located close to the proposed Geothermal substation land acquisition will be required. This will be limited to about a 10 m wide corridor to be acquired from two land parcels near the existing ROW of Laudat's hydropower pipeline.

The proposed Project will build the electricity network necessary for the commissioning of the DGPP and integrate it to the national grid. It may be noted that DGDC is currently implementing the DGRMP (P162149), which aimed to diversify Dominica's domestic power generation mix and demonstrate the potential of larger development of the geothermal resource. When both projects are complete, it will be possible to deliver geothermal-based electricity to most Dominica consumers.

The proposed overhead transmission line from DGPP to Fond Cole substation passes through mountainous terrain with green vegetation. The scale of civil works is anticipated to be medium to large but not complex. The potential EHS impacts of the project activities are not likely to be significant and likely to be short-term, reversible and will occur mainly during construction. These risks are related to air, water and noise pollution, waste management, clearing of vegetation, excavation works and traffic management. The impacts will be identified in the ESIA being undertaken based on which the ESMP will be developed. There are also potential risks related to the operational phase, which are discussed under ESS6. During implementation prior to civil works starting, the contractor will be required to develop a Contractor ESMP (C-ESMP) based on the project ESMP. DGDC will be responsible for the detailed review and clearance of the C-ESMP before starting of the physical work. DGDC will share the C-ESMP with the Bank E&S Specialists for comments and ask the contractor to incorporate any changes/edits suggested/recommended by the Bank. If the C-ESMP requires adjustment/updating during the implementation of the project, the contractor will seek the DGDC's clearance before making changes. The contractor will also be responsible to ensure C-ESMP for subcontractors and share with the DGDC before starting those particular activities.

The construction of the DGPP (through private investment), geothermal wells (production and injection wells) and related infrastructure such well pad and access road are considered Associated Facilities to the proposed Project since these meet the criteria given in paragraph 11 of the World Bank Environmental and Social Policy for Investment Project Financing for Associated Facility. The environmental and social instruments prepared for the DGRMP in 2018 i.e., ESIA, ESMP, Resettlement Action Plan (RAP) and SEP were revised and updated by DGDC in 2021 to reflect the change in the scope of works under DGRMP. These reports were reviewed and cleared by the World Bank. The contract for the construction of the power plant is being negotiated. Works at the production well were completed in December 2022. Site preparatory works for construction for the reinjection well are complete and the drilling contractor is now preparing to commence drilling. Regular Environmental Health and Safety monitoring is being conducted at the construction sites by DGDC and their E&S supervision consultant. The ESIA (including the ESMP) to be prepared for the Dominica Geothermal Risk Mitigation II Project (P179845) will summarize the key environmental

and social risks of the DGRMP (P162149) and suggest a coordinated mechanism to monitor the activities i.e. construction of the geothermal plant, the geothermal wells and related infrastructure under DGRMP (P162149).

The Technical Assistance (TA) activities are not expected to generate environmental and social impacts. The requirements set out in paragraphs 14–18 of ESS1 will be applied to TA activities as relevant and appropriate to the nature of the risks and impacts. The terms of reference (TOR) for the activities and other documents defining the scope and outputs of TA activities will be reviewed by the World Bank so that the advice and other support provided are consistent with ESS 1–10 and duly incorporate relevant requirements of the ESSs.

ESS10 Stakeholder Engagement and Information Disclosure

This standard is relevant. The draft Stakeholder Engagement Plan is currently being prepared by the consultants. The project stakeholders identified thus far are (i) the Project-affected parties, such those who are impacted by land acquisition or easements, and communities temporarily affected by the construction activities, including communities of near the proposed sub stations and line, (ii) people and business affected by the operations of the facilities and, (iii) other interested parties such as village councils, nonprofit organizations (NPOs), and relevant government agencies.

Between March 11 and 18, 2023, initial public consultations were carried out at six communities and attended by around 54 community members (30 men and 24 women). Key questions/concerns raised include safety of electromagnetic fields/radiation, safety for families/communities, emergency plans, land acquisition/compensation, land use restrictions, transmission line routes, employment opportunities for youth (construction and O&M phases), etc.

Vulnerable groups include female-headed households, the disabled, the elderly, and migrants. The social consultant met with the National Council of Women, Dominica Council on Aging, and Dominica Association of Persons with Disabilities to explore the best communication methods. These NPOs will be invited to a public consultation on draft E&S tools.

A summary of stakeholder engagement activities will be included in the draft SEP which is to be provided to the Bank 30 days prior to project appraisal.

DGDC has a functioning GRM for the DGRMP. This will be reviewed and updated for this project as needed, so that it meets the requirements of the ESF, and included in the draft SEP.

B.2. Specific Risks and Impacts

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

ESS2 Labor and Working Conditions

ESS2 is Relevant. The type of Project Workers expected are Direct workers and contracted workers. No primary supply workers or community workers are currently envisioned.

Direct workers are those assigned to this project in the DGDC which is the PIU. The DGDC is wholly owned by the government having eight permanent staff members with responsibility for procurement, technical, financial, environmental, and social management, and administrative functions.

The civil works under this project require a small labor force of contracted workers. The risks associated with labor influx, and the risk of child labor, are considered low because the labor influx will be small and easy to manage and because child labor is unlikely because of local restrictions and practices. Risks of discrimination based on gender or ethnicity will be managed through the code of conduct for workers. For the construction of the underground transmission lines, around 10-12 workers would be required per 300m segment, including a few skilled workers (likely regional or international). The contractor would work on 4-5 segments at a time. Similarly, around 10-12 workers would be anticipated per structure site to construct overhead lines. The estimated number of contracted workers will be 100, of which 40 will be foreign, and the remaining will be local.

Detailed labor requirements for the construction works will be included in LMP, which will be prepared as a draft by appraisal, with details of the Labor GRM. The Final LMP is expected to be provided to the Bank within 60 days after project effectiveness and will be in place prior to the hiring of project workers.

ESS3 Resource Efficiency and Pollution Prevention and Management

ESS3 is relevant. Pollution risks associated with the construction of transmission lines and substations include air, noise and water pollution, inadequate disposal of construction wastes and hazardous materials. Environmental impacts due to improper management of construction waste, noise and air pollution will be managed through good construction practices in line with the World Bank General EHS Guidelines and detailed in the ESMP. Fire and life safety risk will be considered at the battery substations.

Green House Gas emission reductions are anticipated for the project and will be calculated as part of the projects results and indicator and economic analysis. Separate estimation will be carried out to determine the baseline and periodic monitoring apart from the ESIA. The terms of reference, work plans or other documents defining the scope and outputs of TA activities will be reviewed to ensure consistency with ESS3.

ESS4 Community Health and Safety

ESS4 is relevant. Adverse impacts on the health and safety of surrounding communities may occur while works are being undertaken. Risks include the excavation works, generation of hazardous and non-hazardous waste, noise, dust, transportation of construction materials and increased traffic. It would be important to ensure that the public is made aware through appropriate signage and fencing to cordon off restricted areas and ensure public safety. Under the DGRMP, DGDC has taken a proactive approach towards traffic management and community relations. Current practices will be reviewed, road safety assessment carried out for the construction and operation phases and adequate measures to mitigate the anticipated impacts will be discussed in the ESMP.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is relevant. Impacts will arise from the creation or expansion of access roads and right of ways for the overhead transmission lines and underground cables. Impacts are expected to be small scale in nature with land acquisition limited to a narrow right of way. There will also be damage to crops and trees during the construction of the overhead lines, temporary restrictions to land or business access which may impact livelihoods are also expected during construction. The extent to which impacts may occur during the operations and maintenance period is not yet known but this will be assessed during the ESIA and included in the RAP. The locations of these impacts are well established, falling along the transmission line routes. These routes are 1) Geothermal to Fond Cole, 2) Geothermal to Laudat, and 3) Geothermal to Trafalgar.

For these three routes a household survey is ongoing. Detailed impact assessment on assets and livelihoods on effected agricultural and forest land at several samples' sites along two of the routes will be carried out, currently the DGDC expects these impacts to be limited with the project expected to increase the landowner's ability to access their own land. Concretely what is currently expected is that the Geothermal to Fond Cole overhead line route will require an expansion of an existing easement as well as some new access roads. The underground cable route from Geothermal to the Laudat substation is half a kilometer long and its construction necessitates land acquisition from two land parcels for a ROW about 10 meters wide. No access road is required for this cable route.

The methodology for compensation for crops, livelihoods, easements, and land acquisition will be detailed in the draft RAP. The draft RAP will be prepared by appraisal, the submission date of the final RAP to the Government is not yet determined but no actions under ESS5 will be permitted until the RAP is cleared by the Bank.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

ESS6 is relevant. The proposed transmission lines traverse the "West Coast Shrub Woodland' key biodiversity area toward the south. This is not a protected area. The project area is also close to the Morne Trois Pitons National Park (MTPNP) which is a UNESCO World Heritage Site. As part of the ESIA and ESIA/ESMP update for the DGPP under the DGRMP, comprehensive biodiversity assessments were undertaken and a range of measures have been incorporated in the project design including designing of a MTPNP monitoring program (by DGDC) to be implemented for the five key species considered Threatened by IUCN: giant ditch frog, imperial parrot, red-necked parrot, forest thrush, and a species of tree frog (Eleutherodactylus amplinympha). The ESMP includes a biodiversity management plan laying out the roles and responsibilities of all stakeholders, mitigation measures and monitoring requirements in line with the Mitigation Hierarchy. Measures are also included to protect the MTPNP from indirect impacts such as possibility of increased hunting. During the construction of the DGPP, these aspects will be monitored by DGDC and the owners engineers' E&S specialists. In addition, DGDC is to engage an independent E&S monitoring consultant to verify compliance with environmental, social, health and safety (ESHS) performance of the overall Project including the biodiversity management plan. The scope of the E&S monitoring consultant will be expanded to include the proposed project as well and will be reflected in the project's Environmental and Social Commitment Plan (ESCP). The ESIA/ESMP for DGRM II project, will consider the adequacy of the measures recommended under the DGRMP and propose additional measures if needed.

The presence of the critically endangered giant ditch frog will be surveyed as part of the ongoing ESIA. Transmission lines near the KBA may increase the risk of bird collision. Biodiversity data collection, focusing on birds, will also be carried out along the proposed transmission lines to conduct an avian risk assessment and propose adequate mitigation measures to avoid/minimize bird collisions. The risk of bird electrocutions from perching will also be assessed. Under the Component 2 of the project, the contractor(s) will receive the training to raise awareness on biodiversity aspects of ESMP.

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

This standard is not currently relevant. The Kalinago mostly live on the east coast of Dominica so there are no expected impacts on indigenous land. Impacts to cultural sites and natural habitats of cultural significance to the Kalinago will be investigated as part of the ESIA and the relevance of the standard will be reassessed.

ESS8 Cultural Heritage

ESS8 is relevant. The ESMP will include a Chance Finds Procedure (CFP) to be implemented in line with national legislation and the requirements under ESS8. Construction contracts will include clauses requiring civil contractors to take proper protective measures in case cultural heritage sites are discovered, including to stop activities if a cultural property is found during civil works.

ESS9 Financial Intermediaries

ESS9 is not relevant. FIs will not be involved in the Project.

B.3 Other Relevant Operation Risks

None

C. Legal Operational Policies that Apply

OP 7.50 Operations on International Waterways	No
OP 7.60 Operations in Disputed Areas	No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

None

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

Actions to be completed prior to Bank Board Approval:

Actions to be completed prior Appraisal:

- Draft a Stakeholder Engagement Plan with its Grievance Mechanism for project stakeholders (developed, consulted, and disclosed)
- Preparation, consultation, and disclosure of the Environmental and Social Impact Assessment and Environmental and Social Management Plan covering the proposed project
- Draft labor management procedures (developed, consulted, and disclosed)
- Draft Resettlement Action Plan (RAP)
- Preparation and disclosure of the draft Environmental and Social Commitment Plan (ESCP)

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

- Preparation and submission of regular monitoring reports on the implementation of the ESCP
- Dedicated E&S specialists assigned and maintained throughout project implementation (including E&S staff of the contractor)
- Capacity building of the implementing agency on environmental and social risk management.
- Consultation, finalization, implementation, monitoring and reporting on the SEP, including the Grievance mechanism.
- Implementation and monitoring of the ESMP
- Deadlines for the final versions of the RAP, SEP and LMP (prior to the beginning of the bidding process)

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS	07-Jul-2023

IV. CONTACT POINTS

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Implementing Agency(ies)

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VI. APPROVAL

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