



HOW TO IMPLEMENT THE HOUSE-LEVEL ENVIRONMENTAL & SOCIAL MANAGEMENT PLAN?

Dominica Housing Recovery Project

Presented by: Environmental Specialist, Project Implementation Unit

OUTLINE

- ▶ Environmental & Social Management Plan (ESMP) Basics
- ▶ HRP Environmental & Social Operational Policies
- ▶ Overview of the House-Level ESMP
 - ▶ Major categories
 - ▶ Sub-categories checklist guide
- ▶ Mitigation Measures to support ESMP Compliance - Examples
- ▶ ESMP Implementation
 - ▶ Along the Homeowner Journey
 - ▶ The Contractor Journey
- ▶ Policies & Tools to support ESMP implementation
 - ▶ ESMP Audit Form
 - ▶ ESHS Tips
- ▶ Challenges on ESMP Implementation
- ▶ Proposed Solutions
- ▶ Contractor benefits to implement the ESMP
- ▶ Next Steps

TRUE OR FALSE

- ▶ Non-compliance with environmental and social safeguards on this project **can result in a construction stop order** by the Physical Planning Division, HRP-PIU and the World Bank. TRUE
- ▶ The HRP safeguards and World Bank safeguards personnel **cannot monitor compliance of ESMP at construction sites** unless they are on island or on-site. FALSE
- ▶ Among the **first communication received from the World Bank safeguards specialist** when construction on the first house commenced was:
 - ▶ Congratulations! TRUE
 - ▶ The contractor is in breach of compliance with the ESMP. TRUE
- ▶ **Mitigation of environmental and social risks associated with workers' and communities' health and safety** is one of the key areas of interest to the World Bank and HRP Safeguards. TRUE
- ▶ **Health and safety at construction sites on Dominica is a high priority** for the Government of Dominica and World Bank supported projects. TRUE

ESMP BASICS

▶ What is the ESMP?

▶ ESMP ⇒ Environmental and Social Management Plan

▶ A simple checklist-type plan to monitor and address any environmental and social issues relevant to the housing project, including health and safety.

▶ **An ESMP is mandatory for each beneficiary house under the Housing Recovery Project (HRP).**

ESMP BASICS

- ▶ **Why is it needed for small residential construction?**
 - ▶ Project risk is rated: ‘substantial’.
 - ▶ Environmental and social safeguards are part of national and World Bank policies.
 - ▶ It guards against any potential threats to the integrity of the resilient construction methods, with the intent to avoid, reduce or mitigate environmental, social, health and safety risks.
 - ▶ It improves decision making; thus promotes efficient and controlled construction cost.

ESMP BASICS

▶ What is the output?

Compliance with the ESMP will:

- ▶ Protect homeowners, contractors, the workers, the community, the public and the project.
- ▶ Pursue a low hazard house construction area for resilience to category 5 hurricanes and seismic activity.

ESMP BASICS

- ▶ **Who implements the individual house-level ESMPs?**
 - ▶ Managed by the contractor/builder and implemented by all construction trade personnel.
 - ▶ Supervised by the Design & Supervision Firm (DSF), who then reports to the Project Implementation Unit (PIU).
 - ▶ Overall monitoring is done by the PIU safeguards team with reporting obligations to the World Bank.
 - ▶ Supported by relevant stakeholders based on the safeguard in question.

ESMP BASICS

- ▶ **When will the inspections take place?**
 - ▶ At all stages of construction, including prior to disbursement of the second, third and fourth payments.
 - ▶ Spot checks without notice at any given point by the PIU safeguards team.
 - ▶ Arrangements may be made for specific visits.

ESMP BASICS

▶ Who approves ESMP compliance?

- ▶ **Physical Planning Division (PPD) and PIU** will approve the environmental and social safeguards according to their respective mandates.
- ▶ Compliance monitoring of the ESMP is coordinated among the DSF, PPD and PIU.
 - ▶ Contractors can assess themselves using the ESMP Audit Form available on www.hrp.gov.dm. Final decision is by the DSF, PIU and PPD.

▶ Can non-compliance with the ESMP lead to a Construction ‘Stop Order’?

- ▶ Yes, there are elements of the ESMP that could trigger a ‘Stop Order’ by the PPD surrounding three major pillars:
 - ▶ Illegal dumping
 - ▶ Environmental degradation
 - ▶ Health and safety (for anyone)

ESMP BASICS

- ▶ **Best practice for compliance: communication**
 - ▶ Contractors are encouraged to engage communication with key stakeholders to resolve all challenges in the quickest time in order to comply with the ESMP.
 - ▶ Stakeholders may include: beneficiary, construction workers, DSF, PIU, neighbour, national authorities, private entities, statutory bodies, community, public.

ESMP BASICS

- Communicate: use signage and other means



ESMP BASICS

▶ How will the project handle COVID-19?

- ▶ COVID-19 forms a part of the ESMP implementation under the major category: Emergency Protocol.
- ▶ Follow guidelines of the Ministry of Health in all work pertaining to the project.
- ▶ Apply World Bank guidelines on construction sites for COVID-19
- ▶ Handle complaints through the HRP Grievance Redress Mechanism
- ▶ Monitor compliance.
- ▶ Report on compliance to the World Bank.
- ▶ Use the Environmental, Social, Health and Safety (ESHS) Tips for a basic guide to implement COVID-19 protocol. Available on www.hrp.gov.dm.

ESMP BASICS

▶ What guides the ESMP?

- ▶ The HRP Environmental and Social Management Framework (ESMF) provides a guideline for the project ESMP.
- ▶ The ESMF provides information about the project, its environmental and social context, social and environmental risks and mitigation measures, institutional arrangements, monitoring indicators, and capacity building and training requirements to ensure that the potential negative environmental and social impacts of project activities are minimized or mitigated, and positive impacts are encouraged and enhanced.

HRP ENVIRONMENTAL & SOCIAL OPERATIONAL POLICIES

- ▶ World Bank Environmental and Social Operational Policies (OP) triggered:
 - ▶ OP4.01 Environmental Assessment
 - ▶ OP4.09 Pest Management
 - ▶ OP4.10 Indigenous Peoples Plan
 - ▶ OP4.11 Physical Cultural Resources
 - ▶ OP10.00 Contingent Emergency Response Component
- ▶ National legislation, policies, guidelines, plans relevant to HRP safeguards - some include:
 - ▶ Physical Planning Act, Dominica Solid Waste Management Act, Environmental Health Act, Forestry and Wildlife Act, Parks and Protected Areas Act, Kalinago Territory Act, National Policy and Action Plan for Gender Equity and Equality, Guide to Dominica's Housing Standards, ...

OVERVIEW OF THE ESMP

HRP ESMP Main Categories

- Site Security
- Traffic Management
- Chance Find
- Site Stabilization, Erosion & Flood Control
- Air Quality
- Pest Management
- Hazardous Management
- Waste Management
- Wastewater/Sewage Management
- Worker Code of Conduct
- Community Relations/Social Sensitivity
- Emergency Protocol

OVERVIEW OF THE ESMP - SUB-CATEGORIES CHECKLIST

No	ESMP Main Activity	ESMP Sub-Activity Monitored
1.	Site Security	Maintain access control
		Material & equipment storage
		Worker storage arrangement
		Secure construction site & equipment
2.	Traffic Management	Stakeholder communication
		Signage
		Movement control
3.	Chance Find	Physical cultural resource
		Human

OVERVIEW OF THE ESMP - SUB-CATEGORIES CHECKLIST

No	ESMP Main Activity	ESMP Sub-Activity Monitored
4.	Site Stabilization, Erosion & Flood Control	Site stabilization
		Erosion control
		Drainage installed
		Drainage performance
5.	Air Quality	Dust control
		Pollution control
		Noise control
6.	Pest Management	Control method
		Authorized personnel/company

OVERVIEW OF THE ESMP - SUB-CATEGORIES CHECKLIST

No	ESMP Main Activity	ESMP Sub-Activity Monitored
7.	Hazardous Management	Asbestos handling, storage & disposal
		Use & management of hazardous materials, fuels, solvent, paints and petroleum products
8.	Waste Management	Waste separation
		Secure storage and use on site
		Transportation of waste
		Disposal to landfill or authorized location
9.	Wastewater/Sewage Management	Manage standing water
		Manage liquid waste
		Install septic tank
		House connection to septic tank & wastewater system

OVERVIEW OF THE ESMP - SUB-CATEGORIES CHECKLIST

No	ESMP Main Activity	ESMP Sub-Activity Monitored
10.	Workers' Code of Conduct	Training/orientation of workers
		Worker sanitation facility
		Labour & working conditions
		Occupational health & safety
		Emergency management
11.	Community Relations / Social Sensitivity	Potential conflict with neighbours
		Community relations
		GRM activated, conflict resolution plan
		Communications, Consultations, Awareness
12.	Emergency Protocol	Emergency protocol e.g. COVID-19, weather events
13.	Other	Any other activity

MITIGATION MEASURES TO SUPPORT ESMP COMPLIANCE - EXAMPLES

Awareness Sessions throughout Construction

Prior to Construction Contract Award

- ▶ HRP Contractors' Workshop - safeguards' presentations on:
 - ▶ How to implement the ESMP?
 - ▶ Workers' Code of Conduct.
 - ▶ Grievance Redress Mechanism.

Post Construction Contract Award

- ▶ Contractor - PIU Safeguards Awareness Session on ESMP & ESHS Tips
 - ▶ Discuss and provide hard copy of the ESMP Audit Form & ESHS Tips
 - ▶ Held immediately post signing of the Beneficiary-Contractor Agreement at the PIU Office.
- ▶ DSF - Contractor sessions on site, by call, at office.
- ▶ Contractor - workers sessions with workers.
- ▶ Contractor, workers awareness sessions with national authorities where relevant.

MITIGATION MEASURES TO SUPPORT ESMP COMPLIANCE - EXAMPLES

Site Preparation - Earth Works/Excavation Phase

- ▶ **Chance find of human body remains**
 - ▶ Construction halt until clearance provided by DSF to continue.
 - ▶ Work with Central Investigation Department (CID) during investigation.

- ▶ **Chance find of historical artifacts**
 - ▶ Construction halt until clearance provided by DSF to continue.
 - ▶ Work with Physical Planning Division (PPD) during investigation.

- ▶ Cooperate with DSF, CID and PPD where relevant.

MITIGATION MEASURES TO SUPPORT ESMP COMPLIANCE - EXAMPLES

Site Preparation & Construction Phases

- ▶ **Community relations/social sensitivity** - use appropriate communication with homeowners, neighbours, community, public e.g. town hall meeting to inform of project; traffic disruption announcement on narrow road; workers briefed on workers' code of conduct.
- ▶ **Workers' health & safety** - use of personal protective equipment; safe placement of tools in use; clear pathway; beneficiaries are not allowed on site unless guided by the contractor or supervisor and dressed in proper wear e.g. no slippers at construction sites; ramps to the house must be secure.
- ▶ **Site security** - restrict access to avoid accidents; secure material to maintain resilient quality; beneficiaries cannot access site anytime desired and without PPE.

MITIGATION MEASURES TO SUPPORT ESMP COMPLIANCE - EXAMPLES

Site Preparation & Construction Phases

- ▶ **Air quality** - control dust by spraying water on work surface; free area of debris.
- ▶ **Waste management** - separate waste to reduce health hazard; no burning; secure waste on site; cover transported waste; dispose at landfill; secure proof of tipping fee.
- ▶ **Pest control** - control must be performed safely by registered pest control companies.
- ▶ **COVID-19 transmission** - sanitization arrangement/facility.
- ▶ **Other (e.g. biodiversity protection)** - purchase natural materials from authorized dealers to ensure sustainable use e.g. high quality timber from Forestry Division; verify that drainage do not affect sensitive area.

MITIGATION MEASURES TO SUPPORT ESMP COMPLIANCE - EXAMPLES

Demobilization Phase

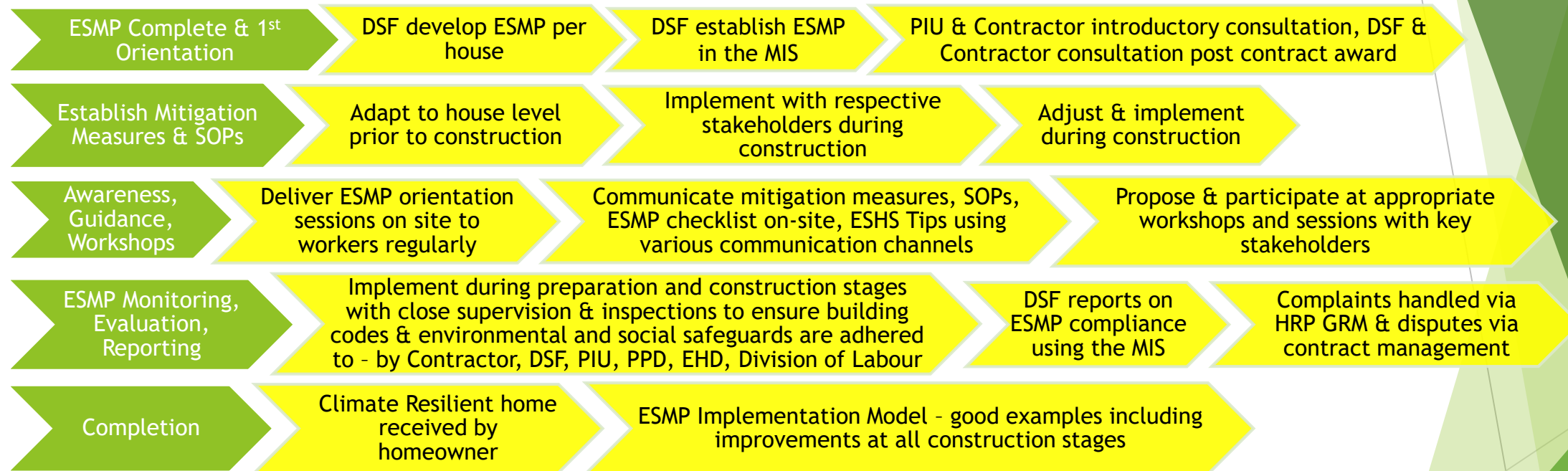
- ▶ Ensure ESMP is in full compliance
 - ▶ Clean the site.
 - ▶ Resolve any grievances.
- ▶ Protect the natural environment
 - ▶ Restore surface and vegetation where it has been significantly disturbed.

ESMP IMPLEMENTATION ALONG THE HOMEOWNER JOURNEY

- ▶ **STAGE 3.** The Design & Supervision Firm documents potential environmental and social safeguards concerns. This will highlight which of the ESMP categories that require additional attention for contractors/builders to implement. Contractors must plan accordingly.
- ▶ **STAGE 4.** Once a beneficiary arrives at stage 4, the contractor/builder will be required to implement the individual house-level ESMP developed by the Design & Supervision Firm.
- ▶ **STAGES 5-8.** Prior to each of stages 5, 6, 7 and 8 during construction, contractors/builders must fulfil obligations of the ESMP at each site.



ESMP IMPLEMENTATION - THE CONTRACTOR JOURNEY



POLICIES AND TOOLS TO SUPPORT ESMP IMPLEMENTATION

- ▶ Implementation is guided by the HRP Environmental & Social Management Framework Version 2 (ESMF v2) to guide contractors
 - ▶ HRP Environmental & Social Management Plan (ESMP) Guide - Annex 7
 - ▶ Mitigation Measures - part of the ESMP Guide - Annex 7
 - ▶ World Bank Guidelines on Construction Sites for COVID-19 - Annex 7
 - ▶ Project Stakeholders & Roles, and Specific Areas of Cooperation & Processes to Support Environmental & Social Safeguards - Annex 5
 - ▶ Contingent Emergency Response Component (CERC) ESMF - Section 12
- ▶ The Grievance Redress Mechanism
 - ▶ Tool to handle complaints on ESMP implementation can be logged on Grievance form - HRP website or HRP App
- ▶ Indigenous Peoples Plan
 - ▶ Strategy applied for the Kalinago homeowners under the HRP

POLICIES AND TOOLS TO SUPPORT ESMP IMPLEMENTATION

- ▶ Ministry of Health & World Bank COVID-19 guidelines
 - ▶ General - Ministry of Health website
 - ▶ Construction works - ESMF v2
- ▶ HRP Management Information System (MIS)
 - ▶ Database tool to monitor, evaluate and report on contractor ESMP compliance for each house construction
 - ▶ Used by PIU, DSF, as well as PPD
- ▶ **ESMP On-Site Monitoring & Awareness Tools for Contractors, DSF & PIU**
 - ▶ **Monitoring:** Environmental and Social Management Plan (ESMP) Audit Form
 - ▶ **Awareness:** Environmental, Social, Health and Safety (ESHS) Tips (updated version will be placed on the website)
- ▶ To reference tools and policy documents, visit:
 - ▶ HRP website: www.hrp.gov.dm
 - ▶ Dominica HRP App - download on Google Play Store

ESMP AUDIT FORM

- ▶ USE: A tool used to assess contractors' compliance with the ESMP.
 - ▶ Results are housed in the Management Information System (MIS) of the project.
- ▶ USERS:
 - ▶ Contractors ESMP compliance rating is measured by DSF using this form
 - ▶ Contractors encouraged to use it as a guide and to self assess compliance
 - ▶ Contractors may use it for daily worker orientation sessions
- ▶ AVAILABLE: on www.hrp.gov.dm

ESHS TIPS

- ▶ Disclaimer: DSF provides directives for ESHS and ESMP tips. The tips are a basic guide.
- ▶ Updated versions are available on www.hrp.gov.dm.
- ▶ Tips will be discussed during ESMP introductory session with PIU Safeguards Specialist.
- ▶ Major areas covered:
 - ▶ General Environmental, Health and Safety
 - ▶ Workers' Code of Conduct:
 - ▶ Priority Actions
 - ▶ Prohibited Actions
 - ▶ Traffic Management - particularly for construction sites near the road or in a residential area
 - ▶ COVID-19 Guidelines for construction works
 - ▶ PPE Guide
 - ▶ Chance Find Guidelines
 - ▶ Grievances versus Disputes for HRP Contractors

TOP CHALLENGES ON ESMP IMPLEMENTATION

- ▶ Hazard communication that leads to workers' action to comply
- ▶ Tool guarding/storage re safety risk for authorized visitors
- ▶ Unsecure ramp to access the house under construction
- ▶ PPE use and basic clothing attire
- ▶ Equipment storage in open space
- ▶ Beneficiary on site without permission and inappropriate PPE
- ▶ Litter e.g. bottle, cement bag (including from beneficiary)

OTHER CHALLENGES ON ESMP IMPLEMENTATION

- ▶ No clear pathway
- ▶ Fall protection e.g. from roof, ladder
- ▶ Scaffolding
- ▶ Voluntary assistance using unsafe practices
- ▶ Any others anticipated?

PROPOSED SOLUTIONS

- ▶ Daily communication to workers
- ▶ Frequent monitoring
- ▶ Engage DSF, PIU on challenges to support contractor efforts
- ▶ Contractor-Beneficiary Forum
 - ▶ Identify challenges of both stakeholders
 - ▶ Engage key partners
 - ▶ Conclude on approach to solutions
- ▶ Any others proposed?

CONTRACTOR BENEFITS TO IMPLEMENT THE ESMP

- ⇒ Results in a resilient house
- ⇒ Encourages a spirit of cooperation and transparency
- ⇒ Creates a hazard risk managed environment
- ⇒ Controls construction cost



- ⇒ Contractors & Skilled Trade Workers in good standing at National and World Bank levels = better business relations
- ⇒ Happy people
- ⇒ Improved quality of life

NEXT STEPS

1. Beneficiary selects a few pre-qualified contractors; provided to the PIU.
2. Pre-qualified contractor is invited by the PIU to bid to construct the beneficiary house.
3. Pre-qualified contractor who wins the bid will receive a letter of award to construct the beneficiary house from the PIU.
4. **On day of signing the beneficiary-construction agreement, the PIU safeguards team conducts the initial environmental and social safeguards introductory awareness session with the awarded contractor and with the beneficiary.**

At this session, a hard copy of the HRP ESMP Audit Form and the Environmental, Social, Health and Safety (ESHS) Tips (current version) is provided to the contractor.

**LOOKING FOR ESMP IMPLEMENTATION
BEST PRACTICE MODELS...**

...get ready to BE AMONG THE FIRST

THANK YOU

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