

Conservation International

Critical Ecosystem Partnership Fund – Caribbean Hotspot Project – P173464

Draft

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

October 9, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Conservation International (CI) will implement the Critical Ecosystem Partnership Fund – Caribbean Hotspot Project – P173464 (the **Project**), with the involvement of the Caribbean Natural Resources Institute (CANARI), Instituto Tecnológico de Santo Domingo (INTEC) and various (as-yet-unidentified) non-profit organizations as sub-grantees. The International Bank for Reconstruction and Development (hereinafter the Bank), acting as the administrator of the Japan Policy and Human Resources Development Fund, has agreed to provide support for the Project.
2. CI will implement and/or, as applicable with respect to sub-grantees, cause implementation of material measures and actions so that the Project is implemented in accordance with the Bank's Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. CI will also comply and/or, as applicable with respect to sub-grantees, cause compliance with the provisions of any other E&S documents required under the ESSs and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF), Environmental and Social Management Plans (ESMPs), Labor Management Procedures (LMP), Process Framework (PF), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. CI is accountable for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the sub-grantees referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by CI as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and CI, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, CI will agree to the changes with the *Bank* and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and CI through its Managing Director. CI will promptly disclose the updated ESCP. Such updated ESCP may also specify the funding necessary for completion of a measure or action.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, CI shall implement actions and measures to address such risks and impacts, and, to the extent needed, the Bank and CI shall consult and agree on a reallocation among Disbursement Categories to fund such measures.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank 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, and implementation of the Environmental and Social Management Framework (ESMF), Environmental and Social Management Plans (ESMPs), Labor Management Procedure (LMP), Process Framework (PF), Stakeholder Engagement Plan (SEP), as well as the measures adopted to prevent the spread of COVID-19.</p>	<p>Every six-months throughout Project implementation.</p> <p>Reports to be sent within the first 7 business days after the end of each reporting report.</p> <p>Mid-term and completion reports will also be submitted, as requested by the Bank, during Project implementation.</p>	Conservation International (CI)
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank 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 without limitation any Project-related fatalities, serious accidents, significant pollution, community unrest caused by the Project or allegations of gender-based violence. Provide sufficient detail regarding 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 supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>The Bank will be notified within 72 hours of CI having knowledge of occurrence of a fatality, and within 15 business days of CI having knowledge of occurrence of any other incident/accident, as defined here. A subsequent report will be provided to the Bank upon request, within an acceptable timeframe to the Bank.</p>	CI
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish an organizational structure with staff to support E&S risk management, in adequate numbers and with experience acceptable to the Bank, to ensure compliance with the ESSs requirements, this ESCP and relevant instruments by sub-grantees.</p> <p>The staff must agree to the CI's Code of Ethics, as well as the implementation of measures to prevent the spread of COVID-19.</p>	<p>Staff to be maintained throughout Project implementation.</p>	CI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT AND ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS</p> <p>1. Implement the Project in accordance with the ESMF that has been prepared and disclosed for the Project, in a manner acceptable to the Bank. This includes screening, assessing, managing and monitoring any proposed subproject or activity in accordance with the ESMF. Any proposed subproject or activity that falls within the negative list of the ESMF shall not be eligible for financing.</p> <p>2. CI shall cause subgrantees to develop, consult, disclose, adopt and implement Environmental and Social Impact Assessments (ESIAs), ESMPs, Pest Management Plans, Health and Safety Plans, Cultural Heritage Plans and measures contained in the PF, where applicable, to address potential E&S risks and impacts of individual sub-projects or other activities, as required under the ESMF.</p>	<p>1. The ESMF, already prepared and disclosed, will be applied throughout Project implementation.</p> <p>2. When necessary, E&S instruments (i.e. ESIAs, ESMPs, Pest Management Plans, Health and Safety Plans, Cultural Heritage Plans) will be prepared prior to implementation of individual sub-projects, and, thereafter, implemented throughout sub-project implementation.</p>	CI
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>General procedures to manage contractors are included in the ESMF. Contract-specific requirements to be specified for each subproject as part of subproject (sub-grantee)-level screening, assessment, and management planning, in accordance with the ESMF.</p>	<p>General procedures are already part of the ESMF. Contract-specific procedures and requirements to be specified prior to signing sub-grant agreements or services agreements.</p> <p>Procedures to be implemented and monitored for the duration of implementation of each corresponding subproject.</p>	CI
1.4	<p>PERMIT, CONSENTS AND AUTHORIZATIONS:</p> <p>Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities. Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.</p>	As applicable, to be obtained prior to initiating activities that require permits, consents and authorizations.	CI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>1. Adopt, and implement the LMP that have been developed for the Project.</p> <p>2. CI shall cause subgrantees to develop, adopt and implement their own sub-grantee Labor Management Procedures, where necessary, in accordance with the Project's LMP.</p>	<p>1.LMP acceptable to the Bank have been prepared. LMP to be implemented throughout Project implementation.</p> <p>2. When necessary, sub-grantee Labor Management Procedures will be developed prior to implementation of individual sub-projects, and, thereafter, implemented throughout sub-project implementation.</p>	CI
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. This includes promoting the use of virtual and confidential mechanisms that allow for the recording of the processing and resolution of complaints. The processes and summary results will be reported in the biannual reports to the Bank.</p>	Grievance mechanism operational prior to engaging any Project workers and maintained throughout Project implementation	CI
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt and implement OHS measures and specify these measures in the ESMPs, in accordance with the ESMF.</p>	Same timeframe as for the implementation of the ESMPs, under action 1.2 and 1.3.	CI
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>INTEGRATED PEST MANAGEMENT (IPM): Pest Management Plans, which maximize the use of IPM techniques, will be either prepared as standalone documents or included in the ESMPs based on the procedures outlined in the ESMF. A pest management procedure and a template for the preparation of a pest management plan are included in the ESMF.</p>	Where necessary, ESMPs and Pest Management Plans to be prepared prior to implementation of individual sub-projects.	CI

ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY: Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, and incorporate these measures and actions in the respective E&S instruments referred to in action 1..2 above, in accordance with the ESMF, including, inter alia:</p> <ul style="list-style-type: none"> • Behavior of Project workers, risks of labor influx, response to emergency situations. • Following pest management requirements as outlined in the ESMF, including trainings for beneficiaries on minimizing pesticide use as well as appropriate application and management of fertilizers and pesticides, to minimize risks to community health and safety. • Measures to ensure that security personnel (park guards, community rangers, etc.) involved in the Project act consistently with the requirements of ESS4, as specified in the ESMF. • Measures for Project staff to prevent the spread of COVID-19 to themselves and Project communities, and • Include these measures in the Health and Safety Plans to be prepared by sub-grantees in accordance with the ESMF, in a manner acceptable to the Bank. 	<p>Subproject (sub-grantee) -specific measures identified during subproject screening and assessment and reflected in the E&S instruments prior to initiating activities for corresponding subproject, in accordance with the ESMF.</p> <p>Measures implemented and monitored as applicable throughout Project implementation.</p>	CI
4.2	<p>GBV AND SEA RISKS: Prepare, adopt, and implement measures to prevent and respond to gender based violence, sexual exploitation, abuse and harassment risks. Specific measures will be identified when screening and assessing proposed subprojects and activities and thereafter reflected in the E&S instruments referred to in Action 1.2 above, in accordance with the ESMF.</p>	<p>Generic GBV-risk-prevention measures included in the ESMF. Subproject (at the level of sub-grantees) specific measures identified during subproject screening and assessment and reflected in the E&S instruments of the sub-grantees, prior to initiating activities for corresponding subprojects, in accordance with the ESMF.</p> <p>Implemented and monitored as applicable throughout Project implementation.</p>	CI

4.3	<p>TRAINING FOR THE COMMUNITY: Conduct training for the community designed to heighten awareness of risks and to mitigate impacts specified in this section.</p> <ul style="list-style-type: none"> Workers and other community members will be trained through the Project about the types, characteristics and health impacts and consequences of all potential hazardous products they could use in the different activities of the Project. Consistent with the restrictions of the current pandemic, all reasonable efforts will be made to conduct meetings through online channels, including, but not limited to, Teams, Webex, Zoom and Skype meetings. Additionally, traditional communication channels (TV, newspaper, radio, dedicated phone lines, public announcements, and mail) will be employed when stakeholders do not have access to, or frequently use online channels (internet). <p>Use online communication tools to design virtual workshops, when certain stages of the project require it. Tools such as Teams, Webex or Skype will be used and in situations of low ICT capacity, audio meetings. The use of WhatsApp or Facebook as information transfer platforms is not ruled out.</p>	Trainings to be given prior to initiating activities for corresponding subprojects	CI
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ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

5.1	<p>PROCESS FRAMEWORK: Adopt and implement or cause to implement the Process Framework (PF) in accordance with ESS5 that is being developed for the Project</p>	January 2021. PF to be implemented throughout Project implementation	CI
5.2	<p>GRIEVANCE MECHANISM: Prepare, adopt and implement or cause to implement the arrangements for the grievance mechanism to address “restrictions in access” related complaints as described in the PF.</p>	Same timeframe as action 5.1 above	CI

ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

6.1	<p>BIODIVERSITY RISKS AND IMPACTS: Based on procedures in the ESMF, ESIA and ESMPs will be prepared as needed to manage the potential risks and impacts to biodiversity.</p>	Where necessary, site specific ESIA and ESMPs to be prepared prior to implementation of sub-projects.	CI
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ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES

This standard is not relevant to the Project

ESS 8: CULTURAL HERITAGE

8.1	<p>CHANCE FINDS: Prepare, adopt, and implement the chance find procedure described in the Project ESMF and Cultural Heritage Plans developed for the sub-projects, in accordance with the ESMF.</p>	Chance find procedures to be incorporated into the E&S instruments to be prepared under Action 1.2 above, as required under the ESMF.	CI
ESS 9: FINANCIAL INTERMEDIARIES			
This standard is not relevant to the Project			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>1. Adopt, and implement the SEP that has been prepared and disclosed for the Project, in a manner acceptable to the Bank, to establish measures to allow for a continuous engagement and adequate communication strategies with all relevant stakeholders throughout Project implementation.</p> <p>2. CI shall cause subgrantees to develop, disclose, consult, adopt and implement their own sub-grantee Stakeholder Engagement Plans, where necessary, in accordance with the Project's SEP.</p> <p>Sub-grantees will also be provided with a template for the sub-project-level SEP, together with worked examples. Sub-grantees will have the option of preparing the SEP in English, French or Spanish; templates in all three languages will be made available on the CEPF website.</p>	<p>1. The SEP has already been prepared and disclosed. The SEP will be maintained and implemented throughout the project cycle.</p> <p>2. When necessary, sub-grantee Stakeholder Engagement Plans will be developed prior to implementation of individual sub-projects, and thereafter implemented throughout sub-project implementation.</p>	CI
10.2	<p>PROJECT GRIEVANCE MECHANISM: Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.</p>	Grievance mechanism will be operational prior to starting screening subprojects (at sub-grantee level). Maintain throughout Project implementation.	CI

CAPACITY SUPPORT (TRAINING)

CS1	<p>Training may be required for PIU staff, sub-grantees, communities and other local stakeholders on:</p> <ul style="list-style-type: none">• Stakeholder mapping and engagement.• Specific aspects of environmental and social assessment. The GPSA Project team will deliver trainings on ESF to INTEC and efforts will be coordinated to ensure the activities undertaken by INTEC are in line with the ESF requirements.• Occupational health and safety, including emergency prevention and preparedness and response arrangements to emergency situations.• Gender mainstreaming.• Community health and safety.• COVID-19 prevention and mitigation	<p>Training for Project workers and sub-grantees will be conducted by the Project Implementation Unit (PIU) and/or specialist consultants for the duration of the Project and start within the first six months of Project effectiveness. Training to NGOs, community-based organizations and other non-profit organizations will be conducted after sub-projects approved.</p>	CI
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