



**Eastern Caribbean Partial Credit Guarantee
Corporation**

**CARIBBEAN RESILIENT RENEWABLE ENERGY
INFRASTRUCTURE INVESTMENT FACILITY**

P180831

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

Negotiated

5 March, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Eastern Caribbean Partial Credit Guarantee Corporation (the Recipient) will implement the Caribbean Resilient Renewable Energy Infrastructure Investment Facility Project (the Project), as set out in the Financing Agreement and the Grant Agreement. The International Development Association, acting on its own capacity and acting as the administrator of the Energy Sector Management Assistance Program Multi Donor Trust Fund (the Association), has agreed to provide financing for the Project, as set out in Agreements.
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 Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreements. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. Establish and maintain a Regional Coordination Unit (RCU) with qualified staff and resources to support management of environmental, social, health and safety (ESHS) risks and impacts of the Project including at least an environmental specialist and a social specialist. The responsibilities and qualifications of the E&S specialists will be detailed in the respective Terms of Reference, which will be included in the Project Operations Manual.</p> <p>b. Include environmental and social (E&S) aspects in and sign service level agreements with national PIUs to manage E&S risks and impacts of the Project.</p> <p>c. Enter into agreements with selected Participating Financial Intermediaries (PFIs) for financing eligible subprojects to manage E&S risks and impacts of the Project.</p>	<p>a. Establish a RCU and hire the environmental specialist and the social specialist no later than 120 days after the Effective Date of the Agreements (Effective Date), and thereafter maintain the RCU and these positions throughout Project implementation.</p> <p>b. Within 90 days of the Effective Date.</p> <p>c. By timeline set out in the Agreements.</p>	Eastern Caribbean Partial Credit Guarantee Corporation (ECPCGC)
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement a capacity building plan, that includes activities such as:</p> <p>a. Prepare and implement training for RCU staff, consultants, national PIU staff and relevant government agencies on the E&S project requirements and the implications for their roles and responsibilities in implementing the project, including activities to be undertaken by the independent power producers (IPPs); as well as integrating E&S requirements into bidding documents, stakeholder mapping and engagement, grievance management, emergency preparedness and response, and community health and safety.</p> <p>b. Participate in training on ESHS matters, including (i) environment, social and health and safety considerations in design, (ii) integrating ESHS into procurement process and (iii) contract management for ESHS performance.</p> <p>c. Prepare, implement or participate in additional training and capacity development events for PFIs that includes screening and risk classification of credit guarantees and associated loans, development of the ESMS, and monitoring/reporting on E&S performance of subprojects, as the need arises during project implementation.</p>	<p>a. Training program to commence no later than 180 days after the Effective Date.</p> <p>b. Prior to finalization of first (i) design (ii) bidding documents for works and (iii) start of works contract.</p> <p>c. Prior to engaging with the FIs and thereafter throughout Project implementation</p>	ECPCGC RCU
MONITORING AND REPORTING			
C	REGULAR REPORTING		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of the E&S due diligence undertaken during the preparation of the subprojects by the IPPs • Status of ESHS performance of subprojects during implementation • Inputs into procurement process, including preparation of terms of reference or E&S specifications, and bids reviewed. • Number of inspections/surveys/site visits undertaken if any, including for screening/scoping, team discussions, surveys or data gathering, or supervision of works (and key issues noted). • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • Number and status of resolution of incidents and accidents reported under action E below. • Other aspects that may arise as relevant. 	<p>Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 30 days after the end of each reporting period.</p>	ECPCGC RCU
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association upon request but include summaries of these as annexes to the quarterly reports submitted under Section C above, throughout implementation of the Project.</p>	ECPCGC RCU
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association] upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	ECPCGC RCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL INSTRUMENTS 1. In collaboration with national PIUs, ensure a list of E&S instruments to be prepared for each subproject is included in the bidding documents for Part 2. 2. In collaboration with national PIUs, require selected IPPs to prepare and implement site-specific E&S documents such as Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP), OHS Plan, Waste Management Plan, Resettlement Plan and Consultation Plan, based on the screening undertaken. 3. RCU in collaboration with national PIUs to advise, review and clear the site-specific E&S documents and submit to the Association. 4. RCU to oversee, in collaboration with the national PIUs, and require PFIs that finance subprojects to oversee preparation and implementation of site-specific ESIA/ESMPs. The proposed activities described in the exclusion list shall be ineligible to receive financing under the Project.	1. Before finalizing bidding documents. 2. & 3. E&S documents prepared, cleared and implemented as needed prior to start of civil works. 4. Throughout Project implementation.	ECPCGC RCU
1.2	MANAGEMENT OF CONTRACTORS In collaboration with the national PIUs, incorporate, and cause PFIs to incorporate, the relevant aspects of the ESCP, including, inter alia, ESIA/ESMP, the Stakeholder Engagement Plan requirements, the Labor Management Procedures, and code of conduct, Traffic and Road Safety, Chance Finds, Universal Access, into the E&S specifications of the procurement documents and guarantee agreement between ECPCGC and PFIs, and the loan agreement between PFIs and IPPs. Thereafter, support national PIUs and PFIs to ensure that the IPPs comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.	As part of the preparation of procurement documents and respective contracts; thereafter support national PIUs and PFIs throughout Project implementation.	ECPCGC RCU
1.3	TECHNICAL ASSISTANCE Prepare terms of references (ToRs) of consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities, in collaboration with the national	Throughout Project implementation.	ECPCGC RCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	PIUs, that are acceptable to the Association, and consistent with the ESSs. Thereafter ensure that the outputs of such activities are in compliance with the ToRs.		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES 1. Adopt and implement the Labor Management Procedures (LMP) developed under ESS2 as part of the ESMS. Cause each PFI to prepare and include LMPs in their ESMSs. The LMP shall describe the types of workers to be employed; the regulatory requirements that will govern the employment of workers, and any additional measures to ensure compliance with ESS2; the contractual arrangements (including details of their terms and conditions, pay, hours of work, holiday and other entitlements) that will apply; the approach for recruiting workers (reflecting requirements for non-discrimination, equal opportunity and avoidance of forced/trafficked and child labor), a mechanism dedicated for workers to submit workplace-related grievances; and procedures on how to address SEA/SH related grievances in line with World Bank policies. The LMP shall include the applicable Code of Conduct, as found in the World Bank's Standard Procurement Documents for Works. 2. Review and cause each PFI to review its HR policies for consistency with ESS2 and apply measures to strengthen labor management procedures (LMP) where necessary and include these in their ESMS; and apply their LMP to direct and contracted workers of PFIs and include codes of conduct to prevent and manage incidents of SEA/SH. 3. Implement necessary protocols stipulated under ESMS for screening participating IPPs for worker health and safety practices and monitoring to prevent harmful child labor or forced labor occurrences.	1 & 2. Adopt and disclose the LMP no later than 180 days after the Effective Date, and thereafter implement the LMP throughout Project implementation; Cause each PFI to prepare and include LMP in its ESMS prior to signing the IPP loan agreement. 3. Screening and monitoring of participating IPPs for labor practices will be conducted through Project implementation.	ECPCGC RCU
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN In collaboration with national PIUs, cause PFIs to require IPPs to prepare and implement site-specific OHS Plans if needed, based on the screening undertaken.	Same timeframe as 1.1.2, and thereafter implement the OHS Plan throughout Project implementation.	ECPCGC RCU
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS ECPCGC shall and shall cause PFIs to establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	ECPCGC RCU
2.4	CODE OF CONDUCT		ECPCGC RCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Ensure provisions in the bidding documents for contractors and supervision consultants to establish a code of conduct to be signed by all workers, including any subcontractors, and establishing the minimum content of said code. The code of conduct must be based on the guidelines contained in the LMP and should address, among other issues, the risk of sexual exploitation and abuse and sexual harassment in the workplace.	Before awarding the contract.	
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN In collaboration with national PIUs, cause PFIs to require IPPs to prepare and implement the site-specific Waste Management Plan if needed, based on the screening undertaken.	Same timeframe as 1.1.2, and thereafter implement the Waste Management Plan throughout Project implementation.	ECPCGC RCU
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT In collaboration with national PIUs, cause PFIs to require IPPs to incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the site-specific ESMPs (i.e. 1.1.2).	ECPCGC RCU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY In collaboration with national PIUs, cause PFIs to require IPPs to incorporate traffic and road safety measures in the ESMPs to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the site-specific ESMPs (i.e. 1.1.2).	ECPCGC RCU
4.2	COMMUNITY HEALTH AND SAFETY In collaboration with national PIUs, cause PFIs to require IPPs to incorporate measures to assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, generation of hazardous and non-hazardous waste, noise, dust, transportation of construction materials and increased traffic, and include mitigation measures in the ESMPs.	Same timeframe as for the preparation and implementation of the site-specific ESMPs (i.e. 1.1.2).	ECPCGC RCU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLANS In collaboration with national PIUs, cause PFIs to require IPPs to prepare and implement the Resettlement Plans including livelihood restoration measures if needed, based on the screening undertaken.	Resettlement Plan prepared, cleared and implemented as needed prior start of civil works.	ECPCGC RCU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>In collaboration with national PIUs, cause PFIs to require IPPs to undertake surveys and obtain records as needed to identify baseline conditions of important marine and terrestrial species that may be affected by project activities. Use the baseline to assess the potential impacts and to avoid significant biodiversity impacts and to identify other appropriate controls and mitigation measures which will be included in the site specific ESMPs to be prepared under 1.1.1.</p>	Same timeframe as for the preparation and implementation of the site-specific ESMPs (i.e. 1.1.2).	ECPCGC RCU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
This standard is currently not relevant			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>In collaboration with national PIUs, cause PFIs to require IPPs to include in site specific ESMPs and implement if needed, the chance finds procedure as described in the ESMF of the Project.</p>	Same timeframe as for the preparation and implementation of the site-specific ESMPs (i.e. 1.1.2).	ECPCGC RCU
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	<p>ENVIRONMENTAL & SOCIAL MANAGEMENT SYSTEM</p> <p>1. ECPCGC shall and shall cause each PFI to develop, maintain, and implement an Environmental and Social Management System (ESMS) - to identify, assess, manage, and monitor the environmental and social risks and impacts of private sector subprojects that receive support through guarantees from the Project. The ESMS shall include labor management requirements under ESS2, and, inter alia, the following elements:</p> <ul style="list-style-type: none"> • Identification and screening process of subprojects in collaboration with the national PIUs that may receive support from the Project. • An environmental and social policy endorsed by senior management of ECPCGC and PFIs. • Clearly defined procedures for the identification, assessment and management of the environmental and social risks and impacts of subprojects, including, inter alia, stakeholder engagement and disclosure requirements applicable to subprojects. • Exclusion list with the activities that are not eligible for financing by subprojects. • An organizational capacity and competency for implementing the ESMS with clearly defined roles and responsibilities as set out in actions (d) and (e) below. • Monitoring and reporting of environmental and performance of subprojects and the effectiveness of the ESMS. • Incidents and accidents notification and subsequent reporting requirements. • An external communications mechanism, including measures to respond to public enquiries and concerns in a timely manner. 	ECPGC shall develop the ESMS no later than 240 days after the Effective Date. Require the PFIs to adopt their ESMS prior to signing the IPP loan agreement and implement the ESMS throughout Project implementation.	ECPCGC RCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>2. Review each PFI's ESMS for consistency with the ECPCGC ESMS and with ESS9 requirements. If a PFI already has a corporate ESMS, review and strengthen the ESMS further as needed to ensure consistency with ESS9 and ECPCGC's ESMS.</p> <p>3. Disclose and cause each PFI to disclose a summary of each of the elements of their ESMS through their relevant websites, including the exclusion list.</p>		
9.2	<p>EXCLUSIONS</p> <p>An exclusion list will be included in the ESMS detailing the range of activities ineligible for financing. The following type of activities shall not be eligible for financing under the Project:</p> <ul style="list-style-type: none"> Any activities which may be associated with significant risks and impacts on the environment, community health and safety, labor and working conditions, biodiversity or cultural heritage will be rated as high or substantial risk and will be considered ineligible for Project financing. Any activities located in protected areas, critical and non-critical habitats or culturally or socially sensitive areas, along with subprojects that might have impacts on waterways. Any activities that involve physical or economic displacement. Should any land or property be acquired by beneficiaries, it will be on a willing buyer willing seller basis as documented by legal transaction records. Any activities screened as involving significant risks to labor rights, health and safety of employees, and harmful child or forced labor. Any revision to laws that involves loosening of environmental and social protections or is unable to maintain or enhance environmental and social protections. 	<p>Apply an exclusion list as part of the screening processes conducted under action 1.2.a and 1.2b above. Screen subprojects before determining whether they are eligible to receive support from the project.</p>	ECPCGC/RCU
9.3	<p>FI ORGANIZATIONAL CAPACITY</p> <p>ECPCGC shall and shall cause each PFI to establish and maintain an organizational capacity and competency for implementing each ESMS with clearly defined roles and responsibilities including a trained E&S focal point.</p>	<p>Confirm capacity in place for each ESMS prepared and adopted before carrying out screening of any proposed subproject.</p>	ECPCGC RCU
9.4	<p>SENIOR MANAGEMENT REPRESENTATIVE</p> <p>ECPCGC shall and shall cause each PFI to designate a senior management representative to have overall accountability for environmental and social performance of subprojects supported through credit guarantees through the Project.</p>	<p>Confirm representative designated for each ESMS prepared and adopted before carrying out screening of any proposed subproject.</p>	ECPCGC RCU
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.1	<p>STAKEHOLDER ENGAGEMENT</p> <p>1. Incorporate stakeholder engagement and information disclosure measures in the implementation of Project activities in a manner consistent with ESS10. To this end, ensure that the following measures are implemented:</p> <ul style="list-style-type: none"> • Provide stakeholders with information about the environmental and social risks and impacts of Project activities (e.g. consultancies, studies, capacity building, and any other technical assistance activities) in a timely, understandable, accessible and appropriate manner and format, including but not limited to any environmental and social instruments prepared, through ECPCGC's website, public display boards in offices, and other platforms used by ECPCGC for stakeholder engagement. • Consult stakeholders in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation, including with regards to any environmental and social instruments prepared as part of Project activities. • Document stakeholder engagement activities, including, description of consultations and participation mechanisms utilized, and records of meetings held; feedback received and responses to said feedback; and measures to engage stakeholders who, may be disadvantaged or vulnerable. • Require each PFI to develop, implement and disseminate their own guidelines for external communication to enable beneficiaries and those who believe they are adversely impacted by Project activities to submit complaints, feedback, inquiries, and suggestions. These may involve a range of issues including those related to child and forced labor, health and safety of workers, workplace harassment. The mechanisms should allow submission of anonymous grievances. <p>2. Require the IPPs to prepare and implement site specific consultation plans consistent with the project Stakeholder Engagement Plan and ESS10.</p>	<p>1. Throughout Project implementation.</p> <p>2. Same timeframe as for the preparation and implementation of the site-specific ESMPs (i.e. 1.1.2).</p>	ECPCGC RCU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>1. Establish, 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. 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>	<p>1. No later than 90 days after the Effective Date; and thereafter implement the grievance mechanism throughout Project implementation.</p>	ECPCGC RCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	1. In collaboration with national PIUs, cause PFIs to require IPPs to prepare and implement a grievance mechanism in line with the Project SEP and ESS10.	2. Within 60 days of being awarded the contract or hiring of workers whichever comes first.	
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <p>A. Establishment of the RCU and engagement of environmental specialist and social specialist.</p> <p>1.1. Established ESMS by ECPCGC</p> <p>1.2. Approved E&S documents such as Environmental and Social Impact Assessment and Environmental and Social Management Plans (before the start of works)</p> <p>10.2. Established Project Grievance Mechanism.</p>			