

Environmental and Social Action Plan (ESAP) Barbados Port Inc. – Barbados

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1. Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Design of the WTE facility, EPC contractor requirements.	1. Include as part of the WTE facility EPC contract, ESHS policies, plans and procedures that the EPC will be required to comply with as part of the ESMS.	1. Copy of pertinent part of the contract.	1. 30 days before the order to proceed
1.2	Design of the Shallow Draught Harbor (SDH) expansion facility EPC contractor requirements.	2. Include as part of the SDH expansion EPC contract, ESHS policies, plans and procedures that the EPC will be required to comply with as part of the ESMS.	2. Copy of pertinent part of the contract.	2. 30 days before the order to proceed
1.3	Environmental and Social Management System (ESMS)	1. Develop a detailed, and specific ESMS for BPI, including: (i) policy; (ii) procedures to identify, assess and manage possible E&S, OHS, and occupational risks and impacts associated with each Port activity (including the WTE system), and for workers engaged by third parties (contractors and subcontractors) performing works at the Port; (iii) organizational capacity and competency, including the definition of roles and allocation of responsibilities for the implementation of the ESMS; (iv) emergency preparedness and response protocols; (v) key stakeholder engagement methods or planning; (vi) external communications and grievance mechanism; (vii) protocols for the disclosure of information, decision making and training to communities; (ix) protocols for the evaluation and continuous improvement of the ESMS; and (xi) regular audits and inspections of applicable E&S and OHS requirements under the applicable laws of Barbados.	1. Copy of BPI's ESMS	1. Prior to first disbursement
		2. Adopt of the ESMS for BPI,	2. Evidence of ESMS adoption	2. Prior to first disbursement
1.4	Identification of Risk and Impacts	1. Develop a risk matrix on E&S and OHS risks and impacts for WTE facility construction and operations.	1. Risk matrix for WTE facility.	1. 30 days before the order to proceed
		2. Update the risk matrix for WTE facility construction and operations	2. Updates to the risk matrix	2. As part of the Annual Environmental and Social Compliance Report (ESCR)
		3. Develop a risk matrix on E&S and OHS risks and impacts for Shallow Draught Harbor (SDH) expansion and operations.	3. Risk matrix for the SDH expansion and installation	3. 30 days before the order to proceed

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		4. Update the risk matrix for Shallow Draught Harbor (SDH) expansion and operations	4. Updates to the risk matrix	4. As part of the ESCR
1.5	Management Programs	1. As part of the ESMS, update the following plans: i) Stakeholder Engagement Plan, ii) Emergency Response Plan, iii) Waste Management Plan.	1. Updated Plans.	1. Prior to first disbursement.
		2. Update the Internal Grievance Mechanism	2. Updated Grievance Mechanism	2. Prior to first Disbursement.
		3. Develop monitoring programs for air quality/emissions, effluents quality, and occupational health and safety.	3. Monitoring Programs	3. 30 days before the Operation and Maintenance (O&M) phase.
		4. Produce an Environmental Management and Adequacy Program (EMAP) for the construction phase, that includes: (i) an Impact Management Program for the physical, biological, and visual environment; and (ii) an Impact Management Program for the socioeconomic environment.	4. EMAP for construction	4. 30 days before the order to proceed
		5. Produce an EMAP for the O&M phase, which includes: (i) an Environmental Monitoring and Vigilance Program; (ii) a Solid and Liquid Waste Management Program; and (iii) a Workplace Health and Safety Program.	5. EMAP for O&M	5. 30 days before the O&M phase.
1.6	Organizational Capacity	1. Present an E&S organizational chart that includes roles and responsibilities for each position.	1. Organizational chart	1. 30 days before the order to proceed.
		2. Appoint a person responsible for overseeing the E&S performance of the Port, the Project, the EPC contractor.	2. Copy of the appointment administrative resolution.	2. 30 days before the order to proceed.
		3. Develop a training plan to socialize BPI's ESMS and procedures at all levels of staff.	3. ESMS training plan	3. Six months after the signature of the loan
		4. Report progress on execution of the training plan.	4. Progress Report	4. Periodically as part of the ESCR.
1.7	Emergency Preparedness and Response	1. Update Emergency Response Plan.	1. Updated Emergency Response Plan	1. Prior to first disbursement
		2. Appoint the Emergency Response Team (ERT).	2. Evidence of appointment	2. Six months after the signature of loan agreement.
		3. Implement ERT training	3. Evidence of training	3. As part of the ESCR
		4. Perform drills and simulations involving communities and stakeholder groups.	4. Drill reports.	4. Periodically as part of the ESCR.
		5. Develop a contingency plan for the Fuel Dock station part of the Shallow Draught Harbor expansion, to contain potential spills in bunker station.	5. Fuel Dock contingency planning	5. 30 days before the order to proceed.

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1.7	Monitoring and Review	1. Establish procedures to monitor and measure the effectiveness of management programs.	1. Monitoring procedures	1. Six months after signature of loan agreement.
		2. Update the compliance matrix for legal and contractual obligations.	2. Updated compliance matrix	3. As part of the ESCR
		3. Develop a set of key performance indicators (KPI) to measure the effectiveness of Environmental Social and Health and Safety programs.	4. Key performance indicators	2. Six months after signature of loan agreement.
1.8	Stakeholder Engagement	1. Enhance the Stakeholder Engagement Framework to convert it into a Stakeholder Engagement Plan by including: i) a summary of any previous engagement activities; ii) description of risk and impacts by stakeholder group; iii) prioritization of stakeholders according to their vulnerability, iv) an engagement program including indication of how interactions should be formalized (acknowledge receive of information) and v) a list of time-bound activities to be performed with each group (timetable/periodicity)	1. Copy of a Stakeholder Engagement Plan	1. Prior to first disbursement.
1.9	External Communication and Grievance Mechanism	1. Socialize the external grievance mechanism with the five stakeholder groups.	1. Proof of socialization of grievance mechanism	1. 30 days before the order to proceed
		2. Update the grievance mechanism for the O&M of the project including lessons learned from the construction phase if any.	2. Updated grievance mechanism for the O&M phase.	2. 30 days before Operation.
1.10	On-going reporting to affected communities	1. Prepare a non-technical explanation of the Project to be distributed to the surrounding communities.	1. Non-technical explanation of the Project	1. 30 days before the order to proceed
		2. Conduct a Townhall meeting with the five main stakeholder groups identified to: (i) inform them about the project; (ii) inform the about the possible impacts; (iii) make them aware of the proposed management measures for undesired impacts; (iv) explain the community grievance mechanism; and (v) capture their concerns about the Project.	2. Minutes of the townhall meeting	2. Prior to first disbursement
1.11	Construction and Operation Licenses and Permits	1. Prepare a matrix with all the relevant licenses and permits needed by the company for the Project, including their expiration dates. Designate those responsible for monitoring and renewal. This matrix must be updated periodically.	1. Matrix of licenses and permits	1. Prior to first disbursement
PS 2: Labor and Working Conditions				
2.1	Internal Grievance Mechanism	1. Update the internal grievance mechanism to include a process to capture and process anonymous complaints.	1. Updated grievance mechanism	1. Six months after signature of loan agreement.
2.2	Protecting the workforce	1. Update BPI's HR policy by including the prohibition of child and forced labor.	1. Updated HR policy	1. Six months after signature of loan agreement
2.3	Occupational Health and Safety	1. Monitor and report Lost Time Injury Frequency Rate (LTIFR) and develop root cause analysis of incidents to lower the Frequency Rate.	1. LTIFR	1. As part of the ESCR.
		2. Produce and maintain a risk matrix that identifies potential hazards to workers.	2. Hazard risk matrix.	2. 30 days before the order to proceed and thereafter with the ESCR
		3. Perform a fire safety gap analysis of the current fire system in the buildings identified as suitable for PV roof top installation.	3. Gap analysis report. 4.	3. 30 days before the order to proceed

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		4. In the design of the expansion of the Shallow Draught Harbor include a fire protection system as per NFPA standards.	5. Design of the Shallow Draught Harbor fire protection system.	4. 30 days before the order to proceed
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Air Quality	1. Produce an air emissions monitoring plan.	1. Air emissions monitoring plan	1. 30 days before the Operation and Maintenance (O&M) phase.
		2. Calculate GHG emissions	2. GHG calculations for the upcoming year.	2. As part of the ESCR.
		3. Report on GHG emissions.	3. GHG results for last year.	3. As part of the ESCR.
3.2	Waste Management Plan (WMP)	1. Produce a WMP that includes: i) the review of new waste sources during planning, siting, and design activities, ii) collection of data and information about the process and waste streams in existing facilities, including characterization of waste streams by type, quantities, and potential use/disposition; iii) establishment of priorities based on a risk analysis that takes into account the potential EHS risks during the waste cycle; iv) definition of procedures and operational controls for onsite storage; v) definition of options, procedures and operational controls for treatment and final disposal.	1. Waste Management Plan	1. Prior to disbursement
		2. Adopt the WMP	2. Proof of implementation	2. As part of the ESCR.
3.3	Water Management Plan	1. Develop an Effluent Management Program that includes the evaluation, treatment, control, and monitoring of effluents.	1. Effluent Management Program	1. 30 days before O&M phase
		2. Implement the Effluent Management Program.	2. Evidence of implementation	2. As part of the ESCR
3.4	Pest Control	1. Develop a pest management handbook for BPI and contracted companies to verify the use of authorized products, proper application methods including handling and storage of pesticides, avoiding potential harm to workers, tenants and the community, as well as to stored merchandise, and adapted to the type of pest seeking to control without affecting other non-problematic species.	1. 1. Pest Control Handbook	1. Six months after first disbursement
PS 4: Community Health, Safety, and Security				
4.1	Decommissioning Plan	1. Update BPI's Decommissioning Plan of the current incinerator to include the recommendations from IFC General EHS Guidelines for Construction and Decommissioning	1. Updated Incinerator Decommissioning Plan	1. Prior to decommissioning current incinerator facility
4.2	Emergency Preparedness and Response	1. Update Emergency Response Plan to include safety procedures in case of explosions and fires at fuel storage areas.	1. Updated ERP.	1. Prior to first disbursement