

Environmental and Social Review Summary (ESRS) Renewable Barbados Power Plant Project – BARBADOS

Original language of the document: English
Issuance date: May 2024

1. General Information of the Project and Overview of Scope of IDB Invest’s Review

Renewable (Barbados) Inc. (“RSB”, the “Client” or the “Company”) is proposing to construct and operate a baseload hybrid solar photovoltaic (“PV”) energy facility with hydrogen storage (the “Project”) at Harrow Plantation in the Parish of Saint Philip, Barbados. RSB is a special purpose vehicle (“SPV”) jointly owned by Rubis Caribbean Holdings Inc. and Hydrogène de France (“HDF”) Energy.¹

The Project, which will deliver non-intermittent, carbon-free, and renewable electrical power to the national grid, will also accommodate a medium-scale Blackbelly sheep farming facility within the solar power plant and surrounding green areas.

The Project will be comprised of: i) a 50-megawatt peak (“MWp”) solar PV power plant that will consist of an array of approximately 90,000 solar panels, equipped with PV cells, which will be ground-mounted in a fixed-tilt, south-oriented configuration; ii) a short-term battery energy storage system (“BESS”) with an installed capacity of 15 megawatts (“MW”) housed in cabinets; and iii) a long-term hydrogen energy storage system (“HESS”), composed of: (a) electrolyzers, with a total capacity equivalent to 15 MW that will split the molecules of water (H₂O) into hydrogen (H₂) and oxygen (O₂); (b) pressurized containers to store the H₂; and (c) hydrogen fuel cells with a total capacity equivalent to 3 MW, that will combine the stored hydrogen with the oxygen present in the air to generate energy (electricity).

The Project will generate approximately 56,000 megawatt-hours (“MWh”) per year of solar power with hydrogen storage, thereby providing non-intermittent renewable power to the equivalent of approximately 18,680 residential customers annually (based on an average monthly energy production of 4.67 GWh).

Agricultural facilities will be built to raise a maximum of 1,200 Blackbelly sheep with the aim of producing meat and, if commercially viable, sheepskin and manure. Sheep will be allowed to graze between and beneath the solar panels. On-site agricultural facilities will include sheep pens, a barn for hay storage, a feed silo, water storage tanks, and a designated waste skip area. A dedicated Farm Entity² will operate the agricultural facilities and provide vegetation management services.

¹ i) [Rubis Caribbean](#) is a subsidiary of Rubis Energie, which is a public company headquartered in France and traded on the Paris Euronext exchange. Rubis Caribbean’s operating areas include the marketing, sale and transport of petroleum, petroleum products and aviation fuels within the Caribbean region; and ii) [HDF Energy](#) is a global pioneer in hydrogen power develops and operates high-capacity, large-scale hydrogen-to-power infrastructure to provide firm or on-demand electricity from renewable energy sources (wind or solar), combined with high power multi-megawatt fuel cells.

² A firm to function as specialists in the management of livestock.

The Environmental and Social Due Diligence (“ESDD”) performed for the Project, included, among other activities, the following: i) visits to the proposed Project site; ii) virtual and in-person meetings with the Client’s environmental and social, and management teams; iii) assessment of the Project’s Environmental and Social Management System (“ESMS”), including all related plans and procedures; and iv) an assessment of available social and labor information, including but not limited to stakeholder engagement, occupational health and safety (“OHS”), emergency response, and gender.

2. Environmental and Social Categorization and Rationale

The Project has been classified as a Category A operation according to IDB Invest’s Environmental and Social Sustainability Policy since it will likely generate the following environmental and social impacts and risks: i) dust and noise generation due to the use of heavy machinery; ii) possible occurrence or intensification of erosive processes; iii) potential traffic disruptions; iv) health and safety risks associated with the production and handling of H₂; v) change in land use from agriculture to energy generation; and vi) alteration of the current drainage scheme. These impacts are deemed to be of high to medium intensity. Positive impacts include the reduction of Greenhouse Gas (“GHG”) emissions and carbon footprint, generation of long-term direct and indirect jobs, and decarbonization of the Barbadian energy matrix.

The Performance Standards (PS) triggered by the Project are: PS1: Assessment and Management of Environmental and Social Risks and Impacts; PS2: Labor and Working Conditions; PS3: Resource Efficiency and Pollution Prevention; and PS4: Community Health, Safety and Security.

3. Environmental and Social Context

3.1 General characteristics of the Project’s site

The Project is located at Harrow Plantation, in the Parish of Saint Philip, Barbados, which is situated on the southeastern end of the island. The plantation consists of approximately 123 hectares (approximately 304 acres) of privately-owned land, of which around 73 hectares (180 acres), also known as the Project Development Area (“PDA”), will be leased by the Company for the Project. The land is an existing agricultural area that was previously used for sugarcane farming and some other crops (e.g., cotton).

About 59 hectares (146 acres) of the PDA will be used for the solar PV power plant, including associated rights-of-way (“RoWs”) and various land restrictions such as drainage reserves. Most of this area (over 90%) will also support solar grazing,³ while the remainder will be used to implement the energy storage and management systems that will support the power plant. The remaining land will be used for buildings and facilities associated with the on-site Blackbelly sheep farm as well as general office and storage facilities. Some 10 hectares (25.4 acres) will be left as green space⁴ to be used for grazing and as a fodder pasture for grass harvesting and bailing.

³ The practice of grazing livestock, in this case Blackbelly sheep, between and beneath the solar panels of the power plant

⁴ Undeveloped land that is covered with grass.

Several residential communities are adjacent to the northern and southern boundaries of the Project site,⁵ along with a section of the historic Barbados Railway⁶ which passes along the northern portion.

3.2 Contextual risks⁷

Barbados is classified as a highly open economy,⁸ with exports and imports equal to almost 90% of the Gross Domestic Product (“GDP”), mostly due to the tourism and financial services industries. The country is particularly vulnerable to adjustments in trade such as fluctuations in international commodity prices, downturns in the global demand for tourism, or policy changes abroad. The overall production structure also suffers from limited economic diversification, and the agriculture and manufacturing sectors have been on a steady decline in recent years. On average, agriculture has accounted for 2% of GDP for over a decade, with sugar, cotton, and vegetables as the main agricultural products. Therefore, dependence on imports of food, goods for manufacturing, and oil exposes the country to external shocks.

The energy infrastructure is aging and set up primarily for imported fossil fuel energy sources (e.g., heavy fuel oil and kerosene) which can lead to volatile electricity costs. As such, though overall access to electricity is good, prices are high and identified as an obstacle for the private sector, along with limited energy diversification. Tariffs are also relatively high compared to other countries in the region. Private sector participation in infrastructure remains modest and the island currently lacks a Public-Private Partnerships (“PPP”) policy, appropriate regulations, and the institutional framework within the government to implement PPPs. Furthermore, licensing procedures are slow for new entrants in the energy market, and investment levels in renewable energy sources are limited.⁹

The quality of road infrastructure is higher than neighboring countries but is deteriorating, with most networks being at least 20 years old. Over the past several years, increases in the number of motor vehicles and traffic has rendered the overall quantity and quality of road infrastructure insufficient. This by extension has had direct negative effects on local transport logistics contributing to increasing rates of road accidents.

The island is classified as a ‘water scarce country’ with limited freshwater resources.¹⁰ Infrastructure is also ageing (dating back to the 19th century), and increases have been noted in the demand for water for the domestic, industrial and agricultural sectors thereby escalating challenges with supply.¹¹ Approximately 43% of the water pumped by the Barbados Water Authority (“BWA”) is classified as non-revenue water¹² which is significantly higher than the target of 23% recommended

⁵ This includes Harrow Tenantry, a small community located to the north, and Marchfield Village and Farm Road Terrace located along the southern Project boundary. The HESS and BESS will be located more than 200 meters away from the closest community.

⁶ [Barbados Trailway Project – Railroad](#)

⁷ Information extracted from the Barbados Country Development Challenges (CDC), June, 2018 section of the [IDB Group Country Strategy With Barbados, \(2019–2023\)](#)

⁸ A type of economy where not only the domestic factors but also entities in other countries engage in trade of products (goods and services)

⁹ In 2016, solar photovoltaic (PV) accounted for 2.4% of total electricity distributed, despite PV capacity increasing from 10MW to over 22MW in that year.

¹⁰ Ranked by the Pan-American Health Organization (“PAHO”) (2012) as one of the 15 most water stressed countries in the World.

¹¹ Confronting the Challenges of Sewerage Management in the Caribbean: A Case Study from the Island of Barbados (Nurse et al., 2012)

¹² Water that has been produced and is “lost” before it reaches the customer.

by the World Bank for utilities in developing countries – it is also higher than levels noted in other Caribbean water utilities. Recent developments in the water sector have also revealed old and outdated sewage and sanitation infrastructure in need of maintenance and repair. Although water coverage is universal, access to a centralized sanitation system is limited with flows from domestic septic wells noted as a major cause of environmental damage.

Barbados has a crime rate of 55.27, which is considered moderate.¹³ Most crimes are related to small thefts, bag snatching, and pickpocketing. However, violent crime, including gun violence, has increased over the past few years in the country. Incidents of armed robbery, sexual assault, gang-related shootings, and murder have occurred.

Though the country has a lower homicide rate when compared to other countries within the Latin American and Caribbean region (“LAC”), it is higher than the international average.¹⁴ The main victims, as in other Caribbean countries, are men between 15-30 years old.¹⁵

Public demonstrations are mostly peaceful and infrequent. The last major demonstration was related to the war in the Middle East. No incidents were recorded.

4. Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures

4.1 Assessment and Management of Environmental and Social Risks

RSB does not yet have an ESMS to guide operations. However, in accordance with local requirements, an Environmental and Social Impact Assessment (“ESIA”)¹⁶ was completed for the Project to assess risks during construction, operation, and decommissioning. The ESIA outlines the potential physical, biological, and social impacts associated with Project activities, and mitigation measures to reduce the potential for adverse impacts during each phase.

The Client will therefore prepare an ESMS for the Project.

4.1.a E&S Assessment and Management System

As part of the ESMS, the Company will develop and implement specific management measures, including, management plans and procedures, capacity requirements to implement such plans, and a description of the roles, responsibilities, and level of accountability that each person will have while implementing the ESMS. Such system, among other components, will include: i) an environmental and social (“E&S”) policy; ii) an identification of hazards and the corresponding assessment of risks and impacts; iii) management plans; iv) a description of the required organizational capacity and competency; v) training plans; vi) emergency preparedness and response procedures; vii) a stakeholder engagement plan (“SEP”); viii) a description of the community grievance mechanism; and ix) monitoring and review procedures and protocols.

¹³ The Crime Index is an overall crime level estimate compiled from answers to user survey produce country- or city-level ratings on a 100-point scale, with higher values indicating worse crime.

¹⁴ There have been small upticks from 7.5 per 100,000 in 2012 to 9.9 in 2017.

¹⁵ [IDB Group Country Strategy with Barbados \(2019–2023\)](#)

¹⁶ https://www.renewstable-barbados.com/files/ugd/22dce1_73a3a52d72104edba97894ccaf275623.pdf

4.1.b Policy

RSB is currently developing its E&S Policy. The policy will outline the Company's commitment to operational compliance with both Rubis and HDF Energy Policies and Guidelines, and applicable laws and regulations. It will also define the Project's E&S objectives.

4.1.c Identification of Risks and Impacts

Project's E&S risks and impacts are outlined in its ESIA. Among other components, the ESIA includes: i) baseline surveys, various modelling studies; ii) a quantitative risk assessment ("QRA") for major accident scenarios;¹⁷ iii) assessments of potential impacts due to accidents, malfunctions, and natural and manmade disasters; and iv) an Environmental and Social Management Plan ("ESMP").

Additionally, twelve (12) feasibility studies and assessments were completed for the Project: i) a geotechnical study; ii) a topographic assessment; iii) a climate change risk assessment; iv) a wind study; v) a mechanical load assessment; vi) a rainfall harvesting assessment; vii) a sheep industry study; viii) a life cycle assessment; ix) a drainage study; x) a social and gender assessment; xi) an alternative water resource assessment; and xii) a tax & customs assessment.

4.1.c.i Direct and indirect impacts and risks

Among others, the Project will likely generate the following direct E&S impacts and risks: i) dust and noise generation due to the use of heavy machinery; ii) occurrence or intensification of erosive processes; iii) potential traffic disruptions; iv) health and safety risks associated with the production and handling of H₂; v) change in land use from agriculture to energy generation; and vi) introduction of impermeable surfaces and alteration of the current drainage scheme. Its indirect impacts include: i) changes in community dynamics due to the influx of workers, presence of security forces, and emergency scenarios¹⁸ that could extend beyond the PDA; ii) a change in reflection and lighting conditions due to the potential glint and glare from the solar PV panels; and iii) the use of artificial night lighting to illuminate the Project site as needed for security purposes.

Positive impacts may be associated with reduction of Greenhouse Gas ("GHG") emissions and carbon footprint, generation of long-term direct and indirect jobs, and decarbonization of the Barbadian energy matrix.

Even though most of the management measures to control undesired impacts are included in its ESIA, RSB will i) develop a Contractor Management and Assurance Plan ("CMAP") describing the controls to ensure all environmental, social, health, safety and social, ("ESHS") risks and impacts are adequately managed across all Project stages; ii) complete a detailed QRA to include risk exposure analysis linked to domino events and impacts to both on-site workers and surrounding

¹⁷ Fires and explosions linked to H₂ production, storage, and manipulation in the fuel cells, and in the lithium-ion BESS facility.

¹⁸ These emergency scenarios refer to those outlined in the updated and detail QRA being carried out for this project.

communities; iii) develop and implement a Compensation Framework for minor damage to surrounding infrastructure;¹⁹ and iv) produce a Process Safety Management System (“PSMS”).²⁰

4.1.c.ii Analysis of alternatives

The analysis of Project alternatives considered the following: i) the Do-Nothing Scenario; ii) different potential location sites; and iii) energy-related technology options. The Do-Nothing scenario was not an option, since the purpose of the Project is to provide clean and reliable energy that is needed by the country.

The Project site analysis considered the following criteria: i) parcels of more than 150 acres with a shape that allows to position the hydrogen power center with a minimum setback of 250 meters from all the boundaries of the site; ii) plots that were not a “prime A” agricultural land but still good for sheep rearing; iii) areas not qualified as a “Zone 1” due to the presence of sensitive aquifers; iv) proximity of the site to the 24 kV line network; v) proximity of the plot to a power substation that can host at least 20MW power; vi) availability of the site at reasonable leasing or purchasing prices; vii) availability of decent road access to accommodate oversized vehicles and heavy equipment with minimal infrastructural damage; viii) sites owned by an entity or a single owner; and ix) plots not located in or near wetlands, protected areas, communities, archaeological sites, sensitive habitats, and cultural sites. The Harrow Plantation was assessed as the most ideal location.

Regarding energy-related technology options, other renewable options²¹ were considered not feasible. The combination of PV generation plus a lithium-ion battery and H₂ technologies was found to be the best technical and economical alternative to achieve efficient short-term and long-term energy storage.

4.1.c.iii Cumulative impact analysis

A Cumulative Impact Assessment (“CIA”) was conducted as part of the ESIA which assessed the potential cumulative impacts of the Project in combination with other past, present, and reasonably foreseeable activities. As the ESIA already factors in the effects of past projects, the CIA included the analysis of a set of seven (7) projects²² that are currently under review²³ by the corresponding authorities, as well a group of four (4) projects that are expected to be executed in the medium term. It also included the following valued ecosystem components (“VEC”): atmospheric and acoustic environment; surface and groundwater; flora and fauna; landscape; health and safety; human capital; cultural values; and infrastructure and services.

¹⁹ This will include a social baseline, and an inventory of assets in areas where occasional minor damage may happen.

²⁰ The PSMS will process hazard analysis, operating procedures, training, management of change, incident investigation and emergency planning. Process safety studies relevant to the safe design, construction, and operation of the plant, will include, as a minimum, Hazard and Operability (HAZOP) study; Safety Integrity Level (SIL)/Layers of Protection Analysis (LOPA); Identification of Safety Critical Elements (SCE) and development of their Performance Standards; Hazardous Area Classification study; Occupied Buildings Risk Assessment (OBRA); and, Escape and Evacuation Risk Assessment (EERA), among others

²¹ Wind energy was not an option due to the lack of intensity of the winds; hydro energy was discarded because of the island topography; tide energy was not an option because tides in that part of the world are not big enough; and marine stream generation was also discarded because the ocean currents patterns near the island made it technically and economically unfeasible.

²² Four (4) PV, two (2) residential expansion projects; and one (1) small wind project (two turbines)

²³ One (1) quarry; two (2) PV farms; and one (1) biomass power generating facility.

The assessment concluded that the aggregated impact of the projects included in the analysis over the selected VC was not significant. Therefore, no cumulative impact mitigation plan is needed.

4.1.c.iv Gender risks

In Barbados, women generally have higher educational attainment levels and returns to education especially at the tertiary level. Recent social data shows that this gap has been widening for younger cohorts of the population. In particular, there appears to be some correlation between lower returns to education for men across all education levels, along with lowered incentives for them to invest further in education when compared to women.²⁴

The Employment of Women’s Act protects women from termination due to maternity leave (providing for twelve 12 weeks). However, men are not afforded the same privilege²⁵ as there is currently no formal national policy or legislation in place on Paternity Leave.²⁶

Sectors of the population, such as victims of gender-based violence (“GBV”) and people with disabilities, are still underserved in the social protection system. Although an estimated 24% of total homicides relate to intimate partner homicides, there is only one shelter that receives a governmental subsidy – there are no government-run shelters in the country.

Poverty and vulnerability are gendered and has worsened over the years. According to the most recent Barbados Survey of Living Conditions (“BSLC”)²⁷, there is a higher incidence of poverty and vulnerability among women and female-headed households – poverty for females stood at 21% compared with 14% for males. There are also impacts from brain drain effect due to emigration. Although emigration is lower than in other Caribbean countries, more women (57%) than men (49%) have migrated. Overall, these emigrants generally have higher education levels which indicates a loss of skilled persons due to migration.²⁸

4.1.c.v Gender Programs

The approximate gender profile of the workforce that will be hired for the Project has not yet been determined. However, gender risk and impacts will be managed by an ESG²⁹, Gender and Project Communications Lead with responsibility for all Project specific social, community and gender related issues. The Human Resources (“HR”) policies and procedures which will be developed by the Company will include the prevention of GBV and Sexual Harassment (“GBVSH”), discrimination and sexual harassment in the workplace, sexual exploitation, and abuse in local communities, along with a Gender Action Plan (“GAP”) with gender equality approach. Specifically, the GAP will guide the behavior of all Project workers and include: i) awareness campaigns for both workers and the surrounding communities regarding gender risks; ii) the development, dissemination, and promotion of the Project-specific (community) grievance mechanism outlining specific channels for reporting matters concerning GBVSH which may involve Project workers (including contractors and

²⁴ The returns to secondary education for women are 64% higher than women with no education, compared to 23% for men.

²⁵ A recent policy (June 2021) provides 16 weeks of paid leave for mothers versus 8 weeks for fathers.

²⁶ Information from RSB Gender Questionnaire via IDB Invest.

²⁷ 2016-2017.

²⁸ 50% of emigrants have post-secondary education, compared to 33% non-emigrants.

²⁹ Environmental, social and governance

sub-contractors); and iii) development of an Influx Management Plan, linked to a Human Resource Management Plan (“HRMP”), to assess, monitor and mitigate potential GBVSH impacts from Project-induced immigration along with public security and services (e.g., medical, schools, water, and sanitation).

With the support of the University of the West Indies³⁰ and via the GAP, RSB will conduct mandatory training for all employees (including contractors) on gender sensitivity. The HR policies and procedures will also: i) address safety risks for women in the workplace (e.g. transportation and work in isolated areas); ii) provide details of the personal protective equipment (“PPE”) to be used by women according to their work post; iii) ensure alignment with national law regarding paid maternal and paternal leave; and iv) include a Code of Conduct and Ethics with provisions on non-discrimination, and gender equality and diversity.

All contractors and sub-contractors will be required to adhere to the RSB HR policies and procedures in the hiring and recruitment of employees. These measures will be monitored and evaluated as part of the engineering, procurement and construction contractor (“EP’s”) hiring process. Additionally, the Company will implement an internal grievance mechanism to address complaints from workers, including a confidential and anonymous channel to file complaints associated with harassment and GBVSH.

During the construction phase, there will be separate washroom facilities to accommodate male and female contractors. Similarly, in the operational phase, the Hydrogen Power Centre (“HyPCe”) facility and sheep farm will have separate changing and bathroom facilities.

The Project’s SEP is being updated to consider community-based women led informal groups or associations.

4.1.c.vi Climate change exposure³¹

Though Barbados faces a lower risk of natural disasters compared to other Caribbean States and rarely experiences a direct hit from hurricanes, the potential economic damage can be catastrophic. The last hurricane (Tomas) to hit the island in October 2010 caused US\$8.5 million worth of damage. In addition to tropical storms and hurricanes, other risks include flooding, landslides, and tsunamis along low lying coastal areas.

Increases in atmospheric temperature, changes in weather patterns, more intense tropical storms and hurricanes, sea level rise (“SLR”), storm surge, and coastal erosion are expected to be the main consequences of climate change. These forecasted effects are projected to have negative impacts on the country’s tourism sector, freshwater supply (due to seawater intrusions into aquifers), coastal infrastructure, and coral reefs and fisheries. More frequent precipitation events can increase surface run-off and subsequent sedimentation to the island’s marine ecosystem (coral reefs, fisheries, and seagrass beds). This can diminish their resilience resulting in greater susceptibility to invasive species, SLR, ocean acidity, rising sea surface temperatures, disease, and associated coral

³⁰ Cavehill Campus

³¹ [IDB Group Country Strategy with Barbados \(2019–2023\)](#)

bleaching events. Changes in precipitation and air temperature also pose a risk to agricultural production due to extended dry periods and excess heat resulting in additional economic and food security impacts. Bush fires are also now more frequent especially in sections of the island with transitional or vacant agricultural land.

Flash floods are not uncommon and result from poor drainage, blocked gullies, and inadequate storm water infrastructure. Most road infrastructure and the main port lie within the low elevation coastal zones. Probable losses from a 100-year return period coastal storm surge and hurricane event average US\$1.15 billion.³² The overall impacts from climate change therefore poses several risks to infrastructure and settlements with approximately 70% of the population living along the coast, and over 90% of hotel rooms built on the coast (less than 1/2 mile from the high-water mark and less than 20m (66 feet) above mean sea level).

The changing climatic wind patterns in junction with Barbados's location east of the other Caribbean islands, make the island prone to the negative impacts from: i) volcanic ash, that is occasionally expelled from the La Soufrière Volcano (St. Vincent and the Grenadines)³³; and ii) Sahara dust, that recurrently travels through the Atlantic Ocean and reaches the Caribbean. Besides affecting adversely the environment, these two factors can also impact the operation of any PV facility.

Given its exposure profile the Project is classified as high related to physical climate-related hazards. However, the Client has integrated several project design elements which include adequate mitigation and adaptation measures to offset potential impacts primarily due to risk from hurricanes, flooding, and excess heat and drought which can lead to water scarcity.

The Project is considered Paris Agreement aligned based on the analysis conducted in accordance with the IDB Group Paris Alignment Implementation Approach.

4.1.d Management Programs

The Project's ESMP serves as the primary management program tool outlining general management measures to be followed by RSB and its contractors during Project construction, commissioning, operation and maintenance, and decommissioning.

To supplement the ESMP and provide a more detailed management approach to address the relevant ESHS impacts associated with the Project's construction and operational activities, the Client will develop: i) a Construction Environmental and Social Management Plan ("CESMP") to adequately guide EPC contractors; and ii) an Operations Environmental and Social Management Plan ("OESMP"). The CESMP and OESMP will include, but will not be limited to, provisions related to labor management, OHS, safety, hazardous materials management, solid and hazardous waste management, water management, emergency preparedness and response, community health, safety and security, road and traffic safety management, security management, environmental monitoring plan, stakeholder engagement (including community grievance management and communications strategy), and contractor management.

³² Hazard report (Baird, 2017)

³³ Advisory; <https://www.youtube.com/watch?v=8Nil6TejDio>

4.1.e Organizational Capacity and Competency

The day-to-day affairs of RSB will be managed by a Chief Executive Officer (“CEO”) with support from a Chief Technical Officer (“CTA”), a Chief Finance Officer (“CFO”), and a Corporate Legal Secretary or Administrator. Overall management of the Project (from financial closure to commissioning and including E&S oversight) will be via a Project Manager (“PM”). Specific E&S roles and responsibilities will be managed by 3 support staff which include: i) a ESG, Gender and Project Communications Lead; ii) an E&S Officer with responsibility for general EHS supervision; and iii) a Human Resource Manager with responsibility for all work-related matters such as the development, application and monitoring of the HR policies and procedures.

To address existing gaps in the organizational structure, the Client will i) revise the organizational chart to reflect clear roles and responsibilities for both the construction (inclusive of EPC management) and operational phase. In particular, the updates will identify a Plant Manager with responsibility for implementation of the OESMP, along with additional qualified OHS and ESHS staff to adequately manage and oversee both Project phases. RSB will also require the EPC contractors and subcontractors to appoint qualified and experienced teams to manage their respective scopes of work.

4.1.f Emergency Preparedness and Response

The ESMP outlines key aspects of an Emergency and Disaster Management Plan (“EDMP”), including situations such as spills, fires, vehicles accidents, explosions, and hurricanes.

As part of the CESMP and OESMP, RSB and its contractors will develop Project-specific Emergency Preparedness and Response Plans (“EPRPs”) for both onsite and off-site emergencies. These plans will be linked to the QRA, cover all project components, and include response procedures, equipment and resource provisions, designation of responsibilities, requirements for periodic training and drills, and communication flows, including to and from potentially affected communities and relevant governmental authorities. The EPRPs will also: i) include the analysis of and the responses to potential emergency scenarios (medical emergencies, major accident hazards, natural disasters, extreme weather conditions, etc.) and identify communities and individuals that may be impacted by such situations; and ii) be supplemented by a Communications Strategy to raise awareness, preparedness, and training for affected communities and relevant stakeholders.

4.1.g Monitoring and Review

During the Project’s construction, commissioning, and operation and maintenance phases, its ESMS and ESMP will be periodically audited to evaluate their effectiveness and assess compliance with applicable E&S requirements.

As part of the CESMP and OESMP, RSB will develop: i) E&S Monitoring and Assurance Plans for both the construction and operation phases covering all aspects concerning ESHS (e.g., training requirements; water use and consumption; noise, liquid effluents, solid and hazardous waste management; transportation protocols; workplace conditions; safety; OHS; and labor, security, and stakeholder engagement); and ii) an independent verification system to monitor long-term

implementation of Global GAP³⁴ for Livestock requirements in the Project's agricultural component. Additionally, the CMAP will outline specific controls to oversee and monitor the ESHS performance of the EPC and its subcontractors.

As part of the PSMS, RSB will facilitate: i) an independent review of the operational readiness of the facility; and (ii) a process safety audit one year after the start of commercial operations. Additionally, RSB will: i) engage a third-party Independent Environmental and Social Consultant ("IESC") to, among other tasks, review the effectiveness of the ESMS, CESMP and OESMP; and ii) review and evaluate the effectiveness of the ESMS and ESMPs on a regular basis.

4.1.1.h Stakeholder Engagement

Per local requirements, a public consultation was held during the ESIA preparation process to explain the Project components and related impacts. Ongoing stakeholder engagement is currently limited to public announcements via local media. A SEP and Communications Strategy ("CS") were prepared as part of the ESMP.

The Client will revise the SEP (incorporating the CS) to enhance aspects pertaining to stakeholder analysis and mapping, social monitoring, appropriate means for disclosure of information, addressing specific Project concerns and perceptions, and ongoing engagement and reporting to affected communities. Based on the revised stakeholder mapping and social risk and impacts identified, RSB will also: i) update its area of influence for all Project components, if needed; ii) designate a Community Liaison Officer and Communications Consultant; and iii) establish appropriate mechanisms for conflict resolution.

4.1.1.h.i Disclosure of Information

The Company has a public website³⁵ and social media accounts³⁶ which are currently used to share Project information and activities. The ESIA was publicly disclosed via the website³⁷ and a public consultation session. It can also be accessed through the Planning and Development Department and public libraries.

As part of the SEP and CS, RSB will i) revamp its website and social media pages to reflect key Project updates and ongoing information dissemination; and ii) coordinate additional public consultations and stakeholder engagement sessions.

4.1.1.h.ii Informed Consultation and Participation

The SEP will outline adequate processes to ensure sustained informed consultation and participation throughout the Project's lifecycle.

³⁴ <https://www.globalgap.org/>

³⁵ <https://www.renewstable-barbados.com/>

³⁶ While the company's website is project specific the existing social media platforms are not as part of the Stakeholder Engagement Plan (SEP) and the Communications Strategy (CS) RSB will update and create where applicable appropriate social media account to disseminate and share inform on the project as well as means of engaging stakeholders.

³⁷ https://www.renewstable-barbados.com/files/ugd/22dce1_ef2c386467dc4fd78fdcc15c17177f01.pdf

4.1.h.iii Indigenous Peoples

The Project will not generate any impacts to indigenous communities.

4.1.h.iv Private Sector Responsibilities Under Government-Led Stakeholder Engagement

Project responsibilities in this regard are established primarily through the Ministry of Energy and Business Development and associated departments (including the Environmental Protection Department), along with the Barbados National Energy Policy (“BNEP”) document. Project specific elements pertaining to stakeholder engagement are captured further through the country’s Physical Development Plan (“PDP”) which the Project must comply with, along with requirements related to the conduct of an ESIA.

The Company also currently procures the services of multiple local Barbadian companies to support the development of the Project and continues dialogue with the Barbados Trailway Project representatives to facilitate collaboration once Project activities materialize.

4.1.i External Communication and Grievance Mechanisms

A Community Grievance Mechanism (“CGM”) is outlined in the ESMP. This will be incorporated in the ESMS which will include a Project-specific external grievance mechanism to capture, and process claims from the community.

RSB will elaborate and implement the CGM on an ongoing basis throughout all Project phases to reflect: i) channels to allow confidentiality and anonymity; ii) specific channels for GBVSH grievances; iii) training requirements for personnel handling such complaints; iv) disclosure protocols of the available means to file grievances; and iv) interface with contractors and detailed internal protocols to ensure grievances are adequately addressed, and feedback given to complainants.

External grievances will be managed by the ESG, Gender and Project Communications Lead, supported by the Community Liaison Officer, and Communications Consultant.

4.1.i.i External communication

External communications are currently channeled through RSB’s webpage and social media platforms³⁸, which presents Project news, information, and activities. The Company also has a WhatsApp group for community interaction which will be revamped.

RSB will engage a Public Relations team to support the implementation of the CS.

³⁸ <https://www.youtube.com/watch?v=wOERqC9au0>; <https://www.youtube.com/watch?v=cGH2gCx8bU4>

4.1.i.ii Community grievance mechanism

The ESMS will outline a grievance mechanism for affected communities. An online and on-site CGM will be implemented and accessible via the RSB website. The Client will provide evidence of dissemination and training on the grievance mechanism.

4.1.i.iii Provisions for addressing vulnerable groups' grievances

The HR policies and procedures, the GAP, and the trainings events to be developed will address elements which may impact vulnerable groups including but not limited to discrimination, harassment, GBVSH, exploitation, child and forced labor.

The grievance mechanism will reflect these elements and include measures to address grievances from all stakeholder groups (including vulnerable groups) relevant to Project activities.

4.1.j Ongoing Reporting to Affected Communities

The SEP and CS will outline steps to ensure ongoing reporting to any communities and stakeholders affected by the Project.

4.2 Labor and Working Conditions

4.2.a Working Conditions and Management of Worker Relationships

RSB is expected to employ between 150 – 200 workers during peak construction activities. Around 30% of them will be hired locally. Approximately 20 workers will be employed during operations of the plant and 10 persons are estimated to be employed for the operation of the farm.

4.2.a.i Human Resources Policies and Procedures

HR policies and procedures that will be developed as part of a HRMP, will be aligned with local regulations and international standards, including prevention of discrimination and sexual harassment, and health and safety in the workplace. Specifically, the HRMP will include: i) a Code of Conduct and Ethics for all workers (direct and contractors) with disciplinary actions for non-compliance; ii) the contents of mandatory induction trainings; iii) rules and expected workplace behavior; iv) rules for interactions with local communities; v) prevention measures for GBVSH in the workplace, sexual exploitation, and abuse in local communities; vi) procedures for local recruitment, reporting of working conditions and demobilization; vii) a workers' accommodation plan; and viii) a GAP which will include a gender equality approach and GBVSH prevention and will address safety risks for women in the workplace.

4.2.a.ii Working Conditions and Terms of Employment

Subcontracted work will be undertaken by local construction firms which will employ local workers. Therefore, no workforce accommodation camps are foreseen. However, the EPC contractor may construct small facilities to lodge its workers as a means of limiting competition for local housing.

Employment conditions will be guided by local Barbadian labor regulations.

4.2.a.iii Workers' Organizations

Barbadian labor laws provide for the right of workers to form and join unions. The country has also ratified the International Labor Organization's ("ILO") Convention No. 87 on the Freedom of Association and Protection of the Right to Organize. Therefore, RSB will not impede its workers to exert their right on freedom of association and collective bargaining.

4.2.a.iv Non-discrimination and Equal Opportunity

Per local legislation (that includes all ILO Conventions that have been ratified by the country), provisions regarding non-discrimination and equal opportunity will be outlined via the HR policies and procedures, including the HRMP with associated Code of Conduct and Ethics, and the GAP.

4.2.a.v Retrenchment

There are no plans for collective dismissals as part of the Project. However, the Company will require the EPC contractor to outline employment terms and conditions for short-term or contractual employees, particularly those limited to the construction phase. Workers hired by the EPC contractors may likely be reemployed in other projects.

4.2.a.vi Grievance Mechanism

Per the ESMP, the Company will establish (a) an internal grievance procedure for workers to report such grievances (including confidential, anonymous, and associated with GBVSH), (b) a procedure to disseminate the mechanism among its workers, and (c) logging and tracking methods to ensure follow-up and analysis. The procedure will include interface with contractors, subcontractors, and service providers, as well as internal protocols to effectively manage and report grievances. These elements will also be reflected in the relevant HR policies and procedures.

4.2.b Protecting the Workforce

4.2.b.i Child Labor

The minimum age for employment in Barbados is 16 years of age. Barbados has ratified ILO Conventions No 138. And 182 on Minimum Age and Worst Forms of Child Labor respectively.

HR policies and procedure will contain provisions to enforce local and international labor law requirements to prohibit child labor. The Company will also request proof of identification and age at the time of employment.

4.2.b.ii Forced Labor

Barbados has ratified ILO Convention No. 29 on Forced Labor and Convention No. 105 on Abolition of Forced Labor. HR policies and procedure will contain provisions to enforce local and international labor law requirements to prohibit forced labor.

4.2.c Occupational Health and Safety

Primary OHS risks associated with the Project include fire and explosions hazards in the H₂ storage facilities, the BESS and fuel cells, along with potential exposure to chemicals and electric shocks. During the construction phase workers may experience exposure to extreme weather events (e.g., heatwaves or excess precipitation), injury from heavy equipment operations or other machinery interface, and confined space entry.

RSB performed a Hazard Identification (“HAZID”) Study for the Project site and a HAZOP study for the H₂ storage area. Based on these studies, RSB and the EPC contractor will prepare site-specific OHS risk assessments for the Project’s construction and operational phases and implement risk control measures for all identified risks and hazards, including a permit to work system and specific safe work procedures to manage and control high risk activities. RSB will also: i) develop and provide H&S training to workers and contractors for the primary hazards and risks; ii) ensure provision of PPE to workers; and iii) provide timely incident reports with root cause analysis. OHS aspects will be embedded within the EPC contractor management plans.

Additionally, RSB will: i) establish H&S management and monitoring programs in line with Rubis and HDF OHS policy and plans; ii) develop an OHS Plan for the Operations phase; and iii) manage EPC contractor oversight via a designated Health Safety and Environment (“HSE”) Officer.

4.2.d Provisions for people with disabilities

As feasible and applicable, the Project design will incorporate the elements of Universal Design. This will include capitalizing on such proposed enhancements which may materialize via the Barbados Trailway Project. The Project will install clearly visible signage in line with the Universal Design environmental access requirements and standards for persons with disabilities, and will provide open and unobstructed passageways, where needed.

4.2.e Workers Engaged by Third Parties

RSB has set the minimum E&S criteria to be followed by the selected EPC contractor (and its subcontractors). However, it will revise and update it to include, at minimum: i) the development and implementation of an ESMS tailored for the construction phase; ii) adherence to the applicable Project policies; iii) detailed ESHS plans to be developed and implemented; iv) provisions of E&S personnel and resources allocated to the contract; v) monitoring and reporting of E&S performance

requirements; and v) explicit commitment to comply with the national law and legal obligations ascribed to the Project.

4.2.f Supply Chain

HDF has a Responsible Purchasing Charter (“RPC”) with specific provisions against child and forced labor and requirements to ensure a safe and healthy workplace. The RPC will be adopted by RSB and incorporate it in contractual clauses for EPC contractors and associated suppliers. RSB will also require the development and implementation of a Subcontractor and Supplier Management Plan (“SSMP”) which will be prepared as part of the CESMP, that will specify the procedures for screening suppliers.

The project supplier for the photovoltaic component will be chosen through a process that will require it to comply HDF RPC and to declare and guarantee that: (i) it will comply, and will ensure that its related companies comply, with all laws applicable to the supply of products or performance of services to be rendered, including, among others, laws regulating labor conditions, health and safety of suppliers' collaborators, environmental protection, and ethical practices; and (ii) it will develop policies and practices to respect and maintain good relations with local communities, ethnic communities, and stakeholders.

The solar panels and components procurement contract will require the supplier to comply with (and to require its sub-suppliers to comply with) all applicable labor laws and regulations, including, but not limiting to, the following provisions: i) the non-use of child labor or forced labor in the production of the photovoltaic products; ii) due diligence of its supply chain, using child labor and forced labor indicators of the International Labor Organization (“ILO”); iii) not having purchased photovoltaic products that have been or are being produced using child or forced labor; iv) a commitment to monitor its suppliers on an ongoing basis to identify any significant changes in its supply chain; and v) a commitment to take appropriate measures and to immediately inform the Project when new risks or incidents of child or forced labor have been detected.

Once the solar panel provider is selected, the Client will: i) provide a map of the supplier’s solar panel supply chain listing the sub-suppliers' facilities, at least at the level of the polysilicon components; ii) adopt measures to ensure that these sub-suppliers will be the only source of photovoltaic materials for the Project; and iii) provide a copy of the bill of materials for the panels to be acquired for the Project.

4.3 Resource Efficiency and Pollution Prevention

4.3.a Resource Efficiency

The energy facility components will be controlled and optimized via an integrated Energy Management System (“EMS”). Where other solar PV approaches provide intermittent power with little or no storage, the Project offers a baseload solution combining solar power with H₂ and lithium technologies. The energy generated by the Project will provide non-intermittent renewable power

to the equivalent of approximately 18,680 residential customers annually. It will also help Barbados achieve its renewable energy and carbon neutrality targets.

4.3.a.i Greenhouse Gases

GHG emissions from the Project are expected to be less than 25,000³⁹ tons CO₂ equivalent (“tCO₂eq/year”). Project emissions will be mainly associated with transport, on-site equipment, machinery operation during construction, and the operation of the sheep farm. The Project is expected to generate approximately 56,000 MWh of electricity per year, resulting in an estimated GHG reduction of 37,226 tCO₂eq/year.

4.3.a.ii Water Consumption

Standard Project-related operational water consumption requirements are estimated to be between 60 to 75 cubic meters (m³) per day. Half of this will serve for H₂ production from water electrolysis, and the other half for non-potable purposes (e.g., sanitary uses, O&M activities, livestock hydration, and irrigation).⁴⁰

The Project water supply will be sourced primarily from the public potable network (groundwater access) via the Barbados Water Authority (BWA). Anticipated water volume requirements are not considered to be significant, nor expected to impact the country’s water availability. An Alternate Water Source Assessment alongside a Rainwater Harvesting Report was prepared with conclusions and recommendations to capitalize on this resource and supplement the demand for non-potable water, versus reliance on the public supply system thereby avoiding possible strain (especially during the dry season). This is also anticipated to reduce some operational costs to the Project.

RSB will therefore reduce the Project’s water footprint through a Water Usage Management Plan with measures that include: i) maximizing the use of rainwater and use for non-potable water processes (in particular, maintenance activities, sheep farm areas); and ii) maintaining drainage systems to ensure aquifer recharge. Surface runoff from rainwater will be managed through on-site drainage works and directed towards suck wells.

4.3.b Pollution Prevention

Measures to ensure pollution prevention for all Project phases are in the ESMPs. No detergents or cleaning chemicals will be used (particularly during O&M) to prevent groundwater pollution.

4.3.b.i Wastes

In accordance with applicable regulatory requirements, solid (agricultural waste, construction and municipal solid waste, and scrap metal and non-hazardous electronic components) and hazardous waste (used lithium-ion batteries, solar PV panels, used potassium hydroxide solution, and used

³⁹ Estimated at less than 6,000 tCO₂eq/year

⁴⁰ Average estimates: 60 m³/day for a standard day of operation: this water will be demineralized; 4.5 m³/day for sheep farming and staff operations; Solar panels will be hand-cleaned twice a year with an average estimated consumption of 800m³/year.

transformer oil) will be segregated and temporarily stored on-site for later off-site disposal, recycling, and/or treatment at approved waste management facilities.

As part of the CESMP and OESMP, RSB and its contractors will develop a Waste Management Plan (“WMP”). The plan will outline the process for appropriate waste storage, segregation, and transportation, as well as an assessment of available waste treatment and final disposal facilities. It will also include viable disposal options for damaged or decommissioned solar PV panels.

Agricultural waste⁴¹ will be stored in a designated bio-waste storage area. This waste will be either bagged and sold as fertilizer or removed and disposed of by an approved local bio-waste facility.

As there is no sewerage network available in the Project site, wastewater from sanitary uses will be preliminarily treated at an onsite septic tank which will be emptied periodically and disposed of at adequately licensed facilities.

An average of 60 m³/day will be treated via reverse osmosis to remove minerals and produce approximately 30 m³/day of demineralized water for H₂ electrolysis. The remaining water is not expected to contain contaminants (other than the minerals removed during the reverse osmosis process) and will either be used for irrigation or disposed appropriately following the applicable standards. The WMP will address all liquid waste streams.

4.3.b.ii Hazardous Materials Management

Additional hazardous materials that will be present on-site include fuels, hydraulic fluids, and lubricants. Hazardous substances will be stored in secure areas with secondary containment.

As part of the CESMP and OESMP, RSB and its contractors will establish and implement a Hazardous Material Management Plan (“HMMP”), that will be linked to the EPRP and include procedures for spill prevention, control, and response.

4.3.b.iii Pesticide Use and Management

The Project intends to establish an Integrated Pest Management Strategy (“IPMS”) Protocol with a documented plan considering alternatives, and adherence to manufacturers recommendations for application. The plan will include a commitment to not purchase, store, use, or trade in products that fall in WHO Recommended Classification of Pesticides.⁴²

⁴¹ This is estimated at 1,200 metric tons per year, assuming a herd of 1,830 mostly adult sheep

⁴² According to Hazard Class Ia (extremely hazardous); or Ib (highly hazardous).

4.4 Community Health, Safety and Security

4.4.a Community Health and Safety

The Project's interventions may generate moderate to high E&S impacts associated with H₂ storage and handling. Air and noise impacts resulting from the operation of equipment will be mitigated with appropriate sound attenuation devices that will be required for all vehicles and machinery. These and all other E&S impacts will be managed via the Project's ESMS, ESMPs, HRMP, CMAP, QRA and PSMS. Gender-related risks will be addressed through the GAP and GS.

Construction activities will be scheduled during daytime to avoid undue nuisance to off-site receptors. The Project components required for construction and equipment installation will be transported by truck.⁴³ Therefore, as part of the CESMP and OESMP, RSB will develop a Road Safety and Traffic Management Plan ("RSTMP") incorporating a journey management plan to address traffic risks especially. The plan will: i) identify critical social infrastructure (e.g., hospitals and schools) to prevent accidents and protect vulnerable pedestrians; ii) designate critical rest locations for drivers; iii) contain an inventory of road and surrounding infrastructure that could be affected; iv) include an assessment of existing roads prior to the start of construction to determine any additional maintenance works required; v) include speed limits, vehicle maintenance requirements, emergency response protocols for road accidents, and procedures for consultation and coordination with local traffic authorities and the police; vi) address driver fitness; and vii) describe training requirements and needed competences.

4.4.a.i Infrastructure and Equipment Design and Safety

Solar PV panels will be anchored to the limestone bedrock and fixed to transverse channels. To prevent pull out of pole supports during high wind scenarios, they will be fixed to the ground via connection to steel piles embedded into the bedrock. The PV modules will be designed in accordance with local and international standards, and to withstand Category 3 hurricanes.

O&M of the power plant and associated energy storage and management systems in the HyPCe area will entail: i) regular visual inspections of the PV modules, cables, power stations, and other equipment; ii) thermal control of electrical equipment (e.g., boxes and inverters); iii) cleaning of the PV modules; iv) grass cutting within the grounds of the power plant if solar grazing is insufficient to manage the vegetation; v) transformer oil sampling and testing, and potential transformer retreatment (if necessary) at a specialized third party facility off-site; and vi) corrective or preventative replacement of components such as electrolyte solution, PV modules, inverters, battery cells, and fuel cell stacks. Batteries, fuel cell, and electrolyser stacks will require replacement at least once during the operational lifetime of the Project. RSB will have a designated O&M team including a Plant Manager for the operation phase. There will be additional support from subcontractors as needed.

The EMS will enable aspects of the power plant and energy storage systems (i.e., the BESS and HESS) to be controlled remotely during Project operations. Since Project components in the HyPCe area

⁴³ The roads around the Project site do not have sidewalks and it is estimated that approximately 450 trucks will be required for transportation.

will be mainly automated, the primary job of the Plant Manager will be to monitor the infrastructure (including associated cooling, fire safety, security, and fault detection systems) to support their safe, secure, and efficient operation.

General site lighting will be a combination of power line pole and building-mounted fixtures at convenient places (guard security booth, farm building, staff facility, office, equipment storage building, etc.). Project components and facilities are not anticipated to be permanently lit – detection sensors or manual switches will be used to engage lighting when required for operational tasks, and for security or safety reasons.

The QRA and PSMS will further guide elements of infrastructure design and safety. A Decommission Plan will be included as part of ESMS.

4.4.a.ii Hazardous Materials Management and Safety

Hazardous Materials Management and Safety will be managed through the HMMP and EPRP.

4.4.a.iii Ecosystem Services

There are 23 infiltration wells within the PDA to augment surface water drainage and feed groundwater aquifer recharge. Drainage reserves are included in the proposed layout of the power plant for the management of surface run-off. The proposed drainage reserve areas will be graded and contoured to direct runoff towards suck wells.⁴⁴ A hydrological assessment was undertaken to determine proper positioning and sizing of the drainage reserves to accommodate a sufficient volume of runoff.

The Project will not produce any material impact on ecosystem services.

4.4.a.iv Community Exposure to Disease

Measures to address community exposure during operation and construction will be managed through the ESMPs and GAP (particularly regarding possible exposure to sexually transmitted diseases due to worker influx).

Management of agricultural activities which could lead to potential community exposure via zoonotic transmission, will include the provision of associated veterinary care, along with appropriate biosecurity protocols.⁴⁵ To further reduce such risks, no butchering will take place on site, and dead animals will be removed and disposed of at approved facilities.

⁴⁴ Artificial shafts excavated in soft carbonates to relieve surface flooding.

⁴⁵ <https://www.gov.uk/guidance/animal-welfare>; <https://www.gov.uk/guidance/disease-prevention-for-livestock-farmers>.

4.4.a.v Emergency Preparedness and Response

RSB and its contractors will develop an EPRP for the construction and operational phase of the project. An Emergency and Disaster Management Plan has also been prepared as part of the primary ESMP.

4.4.b Security Personnel

The property will be surrounded by fencing on all sides with the access road near the northeastern Property boundary outfitted with an access gate with a dedicated guard building or security booth. This will serve as the primary entrance with restricted access to the power plant, HyPCe area, and agricultural facilities (other than the open fodder pasture). The HyPCe area will be further enclosed by a 1.8 m (i.e., 6 feet) high security fence.

There will be adequate 24-hour security using both cameras and unarmed personnel. Security personnel will adhere to the Code of Conduct and Ethics developed as part of the HRMP. A Security Management Plan will be included as of the CESMP and OESMP.

4.5 Land Acquisition and Involuntary Resettlement

The PDA is currently governed by an option to lease agreement with the Harrow Limited. This will transition to a formal dual land use lease agreement (25 years) once Project activities commence. The Project will therefore not require the acquisition of land and will not cause any physical or economic involuntary displacement of the population within the immediate PDA.

Generated power will be connected to the national grid via a new underground transmission line ("TL") measuring approximately 3.5 km (2.2 miles), and water connections will be linked to the BWA network. In both cases the TL RoW and pipelines will intersect existing public roads and trails outside of the PDA boundaries. However, the exact route has not yet been determined. Therefore, to mitigate any potential land use risks and impacts, RSB will develop a Land Acquisition and Compensation Framework ("LACF"), including a socioeconomic assessment as appropriate. The SEP will address any complaints associated with land acquisition in this regard.

4.6 Biodiversity Conservation and Natural Habitats

The Project will generate no material impacts to biodiversity.

Though no significant biodiversity values are associated with the Project, the agricultural component will comply with British standards for livestock regarding animal welfare which supersede local standards. RSB will further manage the livestock operation according to Global GAP for Livestock requirements. Sustainable supply chain management will be guided by the RPC.

4.7 Indigenous Peoples

The Project will not affect any indigenous community, nor will it intersect any indigenous territory.

4.8 Cultural Heritage

A section of the historic Barbados Railway crosses the northern section of the PDA.⁴⁶ RSB has excluded this area from the PDA to protect and preserve the historic path. It will consult with the Barbados Trailway Project representatives as well as other relevant regulatory agencies responsible for the protection of cultural heritage and determine appropriate measures to protect the historic path. RSB and its contractors will also develop Chance Find Procedures which will include notification to the relevant authorities, along with the designation of a qualified specialist.

5. Local Access of Project Documentation

Information relating to the project can be accessed by visiting the following web page:

<https://www.renewstable-barbados.com/planning>

⁴⁶ The railway, which is currently under rehabilitation works, will be converted into an accessible pathway for pedestrians, runners, and cyclists as part of the Barbados Trailway Project. This will enable access to [Bridgetown's UNESCO World Heritage properties](#) along the route connecting the East and West coasts of the island.