

Action Item	Related Standard	Action Description	Documentation/ Indicator of Completion	Required Completion Date
1	PS1	<p>DGDC will (a) adopt and implement an overarching ESMS that is consistent with WB Performance Standards and EHS Guidelines for managing the environmental and social performance of the development including the EPC contractor's performance. The ESMS policy and objectives; roles and responsibilities; and project site management in accordance with GIIP covering aspects including: excavation/backfilling at site and transportation of construction material; concrete mixing, casting and construction at site; management of dust, noise, contaminated runoff, soil and water pollution, domestic waste and sewage; traffic management; equipment operation; construction waste management; equipment repairs; hazardous materials and wastes; labor influx, worker accommodation and activities of construction workers; medical checkup, vectors and disease management; occupational health and safety; local hiring and training; emergency response; monitoring and reporting; and compliance requirements for contractors.;</p> <p>(b) Put in place an appropriate environmental, social, health and safety (ESHS) organization (including for EPC contractor), with clearly defined roles and responsibilities for management of EHS and social/labour aspects.</p>	<p>(a) Overarching ESMS reviewed as acceptable by World Bank</p> <p>(b) DGDC ESHS organizational structure in place</p>	Prior to construction being undertaken
2	PS1	<p>DGDC to institutionally strengthen its Safeguards team in environmental and social management systems, procedures, monitoring of EPC Contractor ESHS performance in order to manage the ESHS performance of the development in accordance with WB Performance Standards.</p> <p>In order to achieve this, the DGDC will, using a grant from AfD, engage a specialist E&S consultant to undertake the following:</p> <p>Provide a Social Specialist and an Environmental Specialist in Dominica to (a) undertake general training on ESMP, ESHS etc. (b) to assist with implementation and ongoing monitoring of ARAP, (c) to work with the DGDC to develop and implement the ESMS, (d) to assist the DGDC with ongoing monitoring of the construction contracts</p>	ESHS Safeguards team demonstrates a good understanding of ESHS requirements as determined by WB project monitoring.	<p>E&S specialist to be engaged before end of October 2018.</p> <p>Work to strengthen DGDC Safeguards capability will then be ongoing through the development,</p>

Action Item	Related Standard	Action Description	Documentation/ Indicator of Completion	Required Completion Date
3	PS2	<p>DGDC will develop and implement HR policies and procedures drawing upon WB PS2 provisions. DGDC will require the EPC and O&M contractors to have in place HR policies and procedures that comply with the national laws and WB PS2. DGDC will as part of the EPC contract specify the standards for worker accommodation in accordance with PS2. As part of updated HR policy, DGDC will also develop and implement formal employee grievance mechanisms in line with ESMS and PS2 provisions</p> <p>In order to achieve this, the DGDC will, using a grant from AfD, engage a specialist HR consultant to determine and then prepare the required policies and procedures.</p>	<p>(a) HR policy manual (b) Verification through quarterly construction audit and biannual audit during first two year of operations</p>	<p>Requirements for HR policies and procedures and accommodation standards that are to be include in EPC contract have already been implemented by Jacobs (NZ) in their role as Owner's Engineer.</p> <p>For HR policy and procedure development, HR specialist to be engaged before end of October 2018. Task scheduled to take three months</p>
4	PS2	<p>The DGDC requires Occupational Health Safety (OHS) plans for it's own staff and activities and also to provide a minimum set of standards for all contractors it engages. The primary health and safety objectives will be to ensure effective measures and management of occupational health and safety to minimise workplace accidents and injuries. The plans will meet the requirements specified in the WBG EHS Environmental, Health and Safety Guidelines pertaining to occupational safety and health.</p> <p>The DGDC has engaged Jacobs (NZ) as their Owner's Engineer (OE). One of OE tasks is to prepare these OHS plans. Also, the OE will be present on site for the duration of the main EPC construction contract and will assist the DGDC to monitor the EPC contractor's compliance with OHS.</p>	<p>OHS Plans developed and implemented prior to construction commencing and audited through construction phase on a quarterly basis.</p>	<p>The OE will complete the preparation of the OHS plans by end of October 2018</p>
5	OP 4.12	<p>DGDC to review/audit on a regular basis the land acquisition process being undertaken by GOCD Department of Land and Survey to ensure it is being undertaken in accordance with of Abbreviated Resettlement Action Plan (ARAP).</p>	<p>Land acquisition by GOCD is completed and in accordance with ARAP.</p>	<p>Prior to construction commencing</p>
6	OP 4.12	<p>Conduct an audit of the of Abbreviated Resettlement Action Plan to confirm that the measures to mitigate the impacts of physical economic displacement as set out in the Plan have been applied in accordance with OP4.12. Audit to be conducted by third party one year after commencement of civil works. By waiting a</p>	<p>Abbreviated Resettlement Action Plan Audit Report</p>	<p>One year after commencement of civil works</p>

Action Item	Related Standard	Action Description	Documentation/ Indicator of Completion	Required Completion Date
		year provides the necessary time period required for the actions as set out in the plan to take effect.		
7	PS6	DGDC will develop a Habitat Management Procedure (HMP) that will be adhered to by the EPC Contractor and all Subcontractors during all Project construction works. DGDC will be responsible for monitoring of the Habitat Management Procedure.	Habitat management Plan Regular monitoring as set out EMSP undertaken	Three months prior to construction commencing
8	PS6	DGDC will develop a MTPNP monitoring programme will be implemented for the five key species considered Threatened by IUCN: giant ditch frog, imperial parrot, red-necked parrot, forest thrush, and a species of tree frog (<i>Eleutherodactylus amplinympha</i>), at a frequency of every six months from pre-construction until the completion of one year of construction, and annually thereafter for a minimum of five years of operation. The MTPNP monitoring programme will be agreed with input from the MTPNP managing authorities (National Parks Unit of the Division of Forestry, Wildlife and National Parks), and implemented prior to construction where appropriate.	MTPNP Monitoring programme developed. MTPNP Monitoring programme undertaken as per frequency recommended	Three months prior to construction commencing, and at the recommended monitoring frequency.
9	P1 and 5	The Grievance Mechanism defined in the Stakeholder Engagement Plan has been disclosed by DGDC to the neighbouring communities, and all grievances received by DGDC will be registered and addressed on an ongoing case by case basis.	Grievance Mechanism records and closeouts.	On-going throughout the loan period
10	PS1 and 5	DGDC will update the stakeholder engagement plan including detailed documentation of consultations proposed as part of ARAP development, impact assessment and land procurement related consultations. DGDC will conduct regular stakeholder engagement throughout the life of the project. Records of consultation meetings will be maintained by DGDC.	(a) Updated SEP with documentation records (b) Communication records	On-going throughout the loan period
11	PS1	Establish an Environmental and Social Management System (ESMS) for Operation Phases, to ensure ongoing compliance with requisite environmental, health and safety and social standards (i.e., adopted Environmental, Social, Health and Safety Standards (ESHS), company commitments (as outlined in ESIA),	ESMS for the Operation Phase developed and implemented	Operation Phase ESMS to be supplied three months prior to operations (scheduled ¾ 2020) for Lenders to review.

Action Item	Related Standard	Action Description	Documentation/ Indicator of Completion	Required Completion Date
		and to meet host country legal requirements, the IFC Performance Standards, and the World Bank Group Environmental, Health and Safety (EHS) Guidelines.		
12	PS2	DGDC will develop a Workforce Development Strategy including a commitment to maximize employment and skills opportunities for local people which the EPC Contractor will follow. The Strategy will cover local employment brokerage that will publicise job vacancies; opportunities for women and women's groups to participate in the work force to the extent safe and practical and define targets for women employment (at all levels and skills).	Workforce Development Strategy prepared and the requirements in it being implemented during construction phase.	Three months prior to construction commencing, and at the recommended monitoring frequency
13		<p>DGDC will be responsible for reviewing, approving and supervising implementation of the detailed plans and procedures, consistent with the ESMP and framework ESMS, that will be developed and implemented by the EPC contractor. DGDC will ensure that the construction ESMS is in place before construction begins. As indicated in the ESIA, the Construction ESMS will consist of a set of plans and procedures, which include, but are not limited to: Occupational Health and Safety Management, Traffic Management, Subsidence Risk Management, Soil and Erosion Management, Pest and Weed Management, Waste Management, Biodiversity Restoration, Emergency Preparedness and Response Plan, Grievance Mechanism, Stakeholder Engagement Plan, Chance Find Procedure, and Worker's Code of Conduct (with a section on Cultural Heritage).</p> <p>DGDC will also provide quarterly reports on project implementation to the World Bank.</p>	<p>(a) Inclusion of the ESMP actions for the construction mitigation and monitoring into the EPC requirements with provision for review and approval of the various required plans and procedures to be developed by the contractor</p> <p>(b) Undertaking review and approval of the contractors provided plans and procedures.</p> <p>(c) Results of regular reviews and outstanding actions w.r.t to the approved plans and procedures recorded in the regular required review meetings with contractor.</p>	<p>(a) Before going to bid.</p> <p>(b) As scheduled in the EPC contract, but in advance of construction commencement</p> <p>(c) Ongoing through the duration of the EPC contract</p>