

BARBADOS

Barbados – Beryl Emergency Response and Recovery Project (P507190)

**FINANCIAL INTERMEDIARY ACTIVITY
ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)**

July 7, 2025

APPROVAL AND SIGNATORY PAGE

The undersigned hereby acknowledge that they have reviewed and formally approved this Environmental and Social Management System (ESMS). By signing below, the Parties affirm their commitment to implement, maintain, and continually improve the ESMS in accordance with its principles, procedures, and requirements.

This ESMS becomes effective upon the date of the last signature.

Party A

Name: _____

Title: _____

Organization: _____

Signature:

Date: _____

Party B

Name: _____

Title: _____

Organization: _____

Signature:

Date: _____

ENVIRONMENTAL AND SOCIAL (E&S) POLICY

The Ministry of Environment and National Beautification, Green and Blue Economy (MENB) and the consulting firm acting as the Project Fiduciary Agent (PFA) Enterprise Growth Fund Limited (EGFL), recognise the importance of the fishing sector to the economy of Barbados and are committed to assisting this sector rebound after the devastating effects of Hurricane Beryl that passed over Barbados in July 2024.

The World Bank and MENB believe that environmental protection and social development are among the most pressing issues facing the world today. Therefore, all parties regard sustainable and social development as fundamental aspects of sound business management.

Consequently, we are committed to continuing the integration of environmental and social aspects into our business activities and those with whom we have a relationship with. To implement, we have developed an Environmental and Social Management System (ESMS). Under this, the MENB and the PFA will work to support the following policy objectives:

- There will be no financing of excluded activities, as defined in this ESMS;
- The PFA, acting as an agent for the MENB, commits to inspecting the operations of the sub-borrowers to assure that they are adequately assessed against the environmental & social requirements as defined by the applicable environmental and social national laws and regulations in Barbados and require compliance.
- Environmental and social risk management is adequately integrated into the credit review cycle to ensure they are all screened for environmental and social risks and impacts;
- The PFA and MENB will designate and maintain staff with adequate experience, roles and responsibilities to support the implementation of the ESMS, and will ensure that updates to the ESMS are made as required; and
- Reports will be provided as required to our stakeholders on ESMS implementation.

TABLE OF CONTENTS

ENVIRONMENTAL AND SOCIAL (E&S) POLICY	i
ABBREVIATIONS AND ACRONYMS	1
1.0 INTRODUCTION	3
1.1 Assistance from the World Bank	3
1.2 Role of MENB and ESF Capacity:	5
1.3 Coordination and Information Management	5
1.4 Advising PFIs and Beneficiary Enterprises.....	6
1.5 Monitoring and Reporting.....	6
1.7 Role of the Participating Financial Institutions (PFIs) and their ESF capacity	7
2.0 OBJECTIVES	8
2.1 Applicable Standards and Guidelines	8
2.2 Substantial and High-Risk Activities.....	9
2.3 Moderate Risk Activities.....	9
2.4 Relevant Laws in Barbados	10
3.0 SCOPE	14
4.0 ESMS COMMUNICATIONS AND DISCLOSURE.....	15
5.0 TRAINING AND CAPACITY DEVELOPMENT	15
6.0 ENVIRONMENTAL AND SOCIAL PROCEDURES.....	17
7.0 REPORTING	22
8.0 STAKEHOLDER ENGAGEMENT PLAN (SEP).....	23
9.0 REVIEW AND UPDATE OF THE ESMS	24
10.0 DOCUMENT CONTROL	25
ANNEXES	26
ANNEX A: EXCLUSION LIST	26
ANNEX B: ENVIRONMENTAL AND SOCIAL RISK CATEGORIZATION GUIDANCE.....	27
ANNEX C: SCREENING AND APPRAISAL FORM	29
ANNEX D: TEMPLATE ENVIRONMENTAL AND SOCIAL ACTION PLAN.....	34
ANNEX E: BIENNIAL ENVIRONMENTAL AND SOCIAL MONITORING REPORT TEMPLATE FOR FIs	35
ANNEX F: MATERIAL E&S INCIDENT REPORT TEMPLATE	39
ANNEX G: E&S MONITORING REPORT.....	41
ANNEX H: LABOUR MANAGEMENT PROCEDURE (LMP).....	42
Grievance form	51

List of Figures

Figure 1: E&S Review Process	17
------------------------------------	----

List of Tables

Table 1: Phase 1: Screening and Appraisal (for the PFI to conduct)	17
Table 2: E&S Categorisation	18
Table 3: Phase 2: Closing	19
Table 4: Phase 3: Monitoring	20

ABBREVIATIONS AND ACRONYMS

BFC	Bridgetown Fisheries Complex
E&S	Environmental and Social
EIA	Environmental Impact Assessment
EPD	Environmental Protection Department
ESAP	Environmental and Social Action Plan
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
FA	Fiduciary Agent
FAD	Fish Aggregating Device
FD	Financial Director
FI	Financial Intermediary
GM	Grievance Mechanism
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GoB	Government of Barbados
IDB	Inter-American Development Bank
IFC	International Finance Corporation
IFRC	International Federation of Red Cross and Red Crescent Societies
ILO	International Labour Organization
IPF	Investment Project Financing
LMP	Labour Management Plan
LOC	Line of Credit
M&E	Monitoring and Evaluation
MEFI	Ministry of Finance, Economic Affairs, and Investment
MENB	Ministry of Environment and National Beautification, Green and Blue Economy
OHS	Occupational Health and Safety
PECU	Project Execution and Coordinating Unit
PFA	Project Fiduciary Agent

PM	Project Manager
SBRC	Sustainable Barbados Recycling Centre
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SFA	Subsidiary Financing Agreement
SH	Sexual Harassment
SHaW	Safety and Health at Work Act
SME	Small and Medium-Sized Enterprise
SSA	Sanitation Service Authority.
VAC	Violence Against Children

1.0 INTRODUCTION

Between July 1 and 4, 2024, Hurricane Beryl, the most powerful Atlantic hurricane on record for the month of June, struck several Caribbean nations, including Barbados. On July 1, 2024, Beryl, then a Category 4 hurricane, inflicted severe damage along Barbados's south coast, notably at the Barbados Port (commercial and cruise terminal), the Bridgetown Fisheries Complex, on coastal protection measures (breakwaters and revetments) and resulted in significant beach erosion at Paynes Bay and Six Mens. The hurricane disrupted the accessibility, availability, quality, and utilization of goods and services, particularly the fishing sector with more than 200 vessels damaged in which 90 percent of vessels were uninsured, leading to long-term economic challenges. Additionally, the tourism sector suffered considerable setbacks, with 73 percent of hotels, apartments, and guest houses sustaining varying degrees of damage. The housing sector was not spared, with reports of damage to 40 houses such as loss of roofs, partial collapse, or roof leaks, which has exacerbated the hurricane's toll on the community. The Barbados Red Cross reported on the IFRC GO platform that 208,200 people were affected by the storm, representing almost 74 percent of the total population.

Coastal ecosystems such as coral reefs and eroded beaches sustained extensive damage during the passage of the hurricane Beryl. Fisherfolk at Pile Bay lost 56 pots, Bay Street lost 28 fish pots, Half-moon Fort lost 18, and St. Lawrence lost 12. A total of 114 fish pots have been reported damaged by various landing sites. Fish Aggregating Devices (FADs) 1 and 2 to be forcibly moved from their original locations and FADs 4 and 5 were completely lost.

The fishing industry and vendors within the Bridgetown Fisheries Complex (BFC) have been severely disrupted with 41 of 66 businesses affected and fisherfolk experiencing substantial loss of equipment, stocks, and supplies. This disruption has not only affected their immediate livelihoods but also posed long-term economic challenges, reducing their ability to support their families and sustain their businesses. Women working as vendors in fish markets and within the Bridgetown Fisheries Complex (poor fisherfolk, women participating in the fisheries market value chain, etc.) have been also heavily impacted. The Hurricane has disrupted the accessibility, availability, quality, and use of goods and services in these markets. The destruction of infrastructure and supply chain interruptions have made it difficult for these women to resume their trade, affecting their income and financial stability. This situation exacerbates existing gender inequalities, as women are often primary caregivers and are now facing additional economic pressures.

A survey has already been completed and around 176 boats have been identified for repair and replacement. Technical requirements will be established, and vendors evaluated to ensure that there are no negative environmental outputs such as use of dirty fuels, poor energy efficiency of boat systems and motors, and other technical risks identified by Bank experts. Assurances will be given by all parties that there can be no over-fishing in national and international waters.

1.1 Assistance from the World Bank

Project Components and Project activities will focus on supporting recovery and reconstruction in the wake of Hurricane Beryl while strengthening the country's resilience to future disasters, including and building capacity for disaster preparedness and response capacity. The project is organized in four components. **For this Environmental and Social Management System (ESMS) the component of note is:**

Component 1: Immediate Recovery from a hurricane (US\$43.5 million of which retroactive financing up to US\$5.32 million). This component will finance activities prioritized by the GoB according to the degree of damage in the aftermath of Hurricane Beryl. Activities focus on the immediate response to the hurricane and the resilient recovery of the fisheries sector, Bridgetown Port, Fisheries Marina and affected coastal areas. This component will have three sub-components.

Sub-Component 1.1: Recovery of the Affected Sectors (US\$28.5 million of which retroactive financing up to US\$0.8 million): (a) Financial assistance to repair and replace fishing vessels affected by Hurricane Beryl and propose a mechanism to compensate fisherfolk in the future (US\$10.55 million): The project will provide financial assistance to fisherfolk and related industry members impacted by the hurricane to repair or replace damaged fishing vessels and equipment. The financial support will have two windows: (1) conditional grants to boat owners for 25 percent of the cost for repairs provided boat owners contribute the remaining in-kind and/or in-cash repair cost from their own and/or other sources; and (2) a combination of a conditional grant, subject to the approval of a loan to replace boats destroyed in the hurricane. The MENB's Finance Director (FD), in coordination with Project Execution and Coordination Unit (PECU), will implement the first window, and the MENB will procure the fee-based services of a Fiduciary Agent (FA) reporting to PECU. The MEFI will assume the credit risk for the second window;

Under this Project, the MENB will host the project's PECU and will take the responsibility to facilitate the implementation of the ESMS by the participating Project Financial Intermediary (PFI).

Under the Environmental and Social Commitment Plan (ESCP) the Project is required to ensure a number of aspects are fulfilled including:

- MENB establishes and maintains a unit (within MENB) to take on overall responsibility for Project implementation, including implementation of the ESCP with qualified staff and resources to support management of E&S risks and impacts of the Project including ensuring there is a nominated E&S Focal Point who is responsible for the monitoring of the implementation of the ESMS, and a senior management representative;
- The PFA, acting as an agent for the MENB, will prepare and implement this ESMS for component 1.1.a. (loan and conditional grant for fisherfolk for boat replacement) and assign both a senior management representative to have overall accountability for environmental and social performance and a staff member as an E&S focal person to coordinate E&S requirements and implementation of the Project ESCP and ESMS; and
- The ESMS of the PFA will meet the requirements of Environmental and Social Standard (ESS 9)¹ including ensuring there is the capacity to maintain it. Under the definitions used by ESS9, this is a "specific purpose portfolio" and is ring fenced for monitoring the financial and ESMS aspects of the work.

Reference in this ESMS is also made to other requirements including to:

- Stakeholder Engagement Plan (including a Grievance Mechanism); and

¹ <http://documents1.worldbank.org/curated/en/484961530217326585/ESF-Guidance-Note-9-Financial-Intermediaries-English.pdf>

Labour Management Procedures (see Annex H).

1.2 Role of MENB and ESF Capacity:

The Ministry of Environment and National Beautification, Green and Blue Economy (MENB) in Barbados is responsible for the preservation and protection of the country's environment.

The MENB's mission is to:

- Formulate and implement environmental management programs
- Facilitate the sustainable use of natural resources
- Complement the national, social, and economic development agenda
- Include stakeholder input into decision making

The MENB is the Implementing Agency (IA) and will be directly responsible for the implementation of project components, and for day-to-day execution of activities of the Project. For the component 1.1.a. Line of Credit and conditional grant for fisherfolk for boat replacement (LOC), the MENB, will conduct the due diligence of PFA and sign a consulting agreement with the PFA (and the World Bank will have a no objection to the terms of reference, selection process and due diligence review). The MENB has established a Project Execution and Coordinating Unit (PECU) headed by the Permanent Secretary as the Project Director. For its day-to-day operations, the PECU has hired a Project Manager (PM) and staff, external consultants, and other resources necessary for the successful implementation of the Project.

This unit will comprise seasoned experts and consultants specializing in procurement, financial management, environmental and social risk management, monitoring and evaluation, and communications, supplemented by annual external independent financial audits and regular World Bank implementation support missions. While Barbados has a track record of executing projects with the Inter-American Development Bank (IDB), it is new to managing World Bank Investment Project Financing (IPF) projects and, by extension, applying the World Bank's Environmental and Social Framework (ESF). The PFA's E&S capacity will be assessed during the early stage of implementation and improvements will be made if required.

To bridge this experience gap, the PECU will include at least one (1) environmental and one (1) social specialist, each committed to overseeing the project's environmental and social risk management. Prior to the project launch, the World Bank Team will conduct comprehensive training for the PECU on the relevant Environmental and Social Standards (ESS) relevant to the project. Additionally, the World Bank Team will require the PECU to engage qualified Supervising Engineers or Consultants during the construction phase to ensure that all works adhere to the established codes and standards.

The activities that will be financed are:

- Purchase of new boats
- Construction of boats using approved shells

A summary of the responsibilities of MENB, its PECU and the PFA in relation to the ESMS is provided below:

MENB responsibilities as apex institution under the Project include the following:

1.3 Coordination and Information Management

- Assessment and selection and monitoring of PFIs
- Administration of the consulting agreement between MENB and the PFA
- Submission to the World Bank of sub-loan proposals requiring its prior review

1.4 Advising the PFA and Beneficiary Enterprises

- Providing assistance and proactive advice to the PFA fund management team (including the E&S focal point) and sub-borrowers on all aspects of the project, including terms and conditions of loans and conditional grants, procurement, disbursement, **E&S safeguards procedures**, and Monitoring and Evaluation (M&E)

1.5 Monitoring and Reporting

- Ensuring compliance with all the procedures prescribed in the POM, Project Financing Agreement and the E&S instruments
- Ensuring the maintenance of sub-loan files, in the headquarters of the PFA, ready for audit/review of the MENB and/or the World Bank
- Monitoring the eligibility of the potential borrowers based on the sub-loan agreements
- Reporting to the World Bank on the sub-loan portfolio with information on:
 - Sub-loan commitments, disbursements, delays, and problem loans;
 - Sub-loan portfolio performance aggregated and for the period;
 - A report on sub-loan compliance with sub-loan eligibility criteria; and
 - Analysis of the sub-loan portfolio, with information on geographical distribution, sectors, size of borrowers and replacement boats financed, use of funds (investment/working capital), size and maturity of sub-loans/sub-leases, performance of subprojects, and so on.

1.6 PECU

- Establish and maintain a unit within MENB to take on overall responsibility for Project implementation, including facilitating implementation of this ESMS, SEP and GRM with qualified staff and resources to support management of ESMS at the PFA, including ensuring there is a nominated E&S Focal Point who is responsible for the monitoring of the implementation of the ESMS; Ensure that the ESMS that is implemented will identify, screen, manage, and monitor the E&S risks and impacts of the sub-loans on an ongoing basis, commensurate with the nature and scale of their risks and impacts. Conduct spot-checking, support revising reports by PFIs. The first five sub-loans by the PFA will be submitted to the Bank for prior reviewed by the Bank, thus giving an opportunity to check that the ESMS is working adequately;
- Report material E&S events to World Bank that are identified by the PFA and submit an annual E&S report to World Bank that reports on the implementation of the ESMS by the PFA.
- Promptly report to the World Bank any significant accident/fatal incident. As soon as the PECU becomes aware of an alleged or actual incident, the PECU should promptly inform the World Bank of the incident and promptly provide information about the incident to the World Bank as well as further details as they become available. For any severe incident such as a fatality, incidents that caused or may cause great harm to the environment, workers, communities, or natural or cultural resources, incidents that

may result in high levels of lasting damage or injury, incidents that requires an urgent and immediate response, etc., the PECU shall notify the World Bank within 24 hours after it becomes aware of the incident.

1.7 Role of the Project Fiduciary Agent (PFA) and the required ESF capacity

The PFA will appoint a focal point person to handle E&S issues under the component, and this will be included in the consulting TOR for the PFA. In addition, the MENB and its PECU may provide training in E&S issues to the PFA. The PFAs will be responsible for environmental assessment for sub-borrowers/sub-projects, and for ensuring that each sub-loan proposal includes a process of screening environmental and social safeguards impact, develop mitigation measures to avoid and mitigate those impacts and documentation, as well as monitor to ensure effective implementation of the ESMF.

Terms and conditions of the consulting services contract between MENB and PFIs

- PFA must remain in compliance with the eligibility criteria for subprojects as specified in the consulting services contract to be signed between MENB and the PFA.
- The PFA will be responsible for ensuring that the sub-borrowers comply with the well-established Private Sector Procurement Methods or Commercial Practices which have been found acceptable to the Association for the procurement of goods, works, non-consulting services, and consultant services under sub-loans, and applicable Barbados **Law, Regulations and Legislations and World Bank E&S policies** and regulations, and the E&S safeguard requirements of the Financing Agreement and applicable safeguard instruments. Any questions related to boat replacement procurement should be directed by the PFA to the PECU procurement specialists.
- The PFA will provide MENB with a set of documentation for all sub-loans to enable it to maintain all project records and make them available for ex post review by the World Bank or by external auditors as necessary. This should include the title of the replacement boat, until the loan is completely repaid with interest to the PFA, at which time the title is handed to the borrower (fisherfolk).
- The PFA will be required to provide reasonable information for the purpose of monitoring and an impact assessment during the life of the project (and for a certain period after the project), as may be requested by the World Bank and/or MENB
- Ensure that sub-loans are screened and meet the requirements of the Exclusion List under the Project;
- Ensure that sub-loans are screened against the applicable local, provincial and national laws and regulations in Barbados and take measures to ensure (including site visits) to validate and document that the loan applicant has appropriately identified in its loan application the activities and compliance with laws. If an applicant states that the necessary permits or licenses have not yet been issued, PFIs will advise the applicant to obtain the licenses and permits before loans can be approved;

2.0 OBJECTIVES

The ESMS is set out to identify, assess, manage, and monitor the environmental and social risks and impacts of sub-loans on an ongoing basis under the Project, taking into account the national and local laws and regulations in Barbados and the requirements of the World Bank. As such the key objectives are:

- To integrate E&S considerations into the lifecycle of sub-loans to eligible sub-borrowers to ensure that E&S risks and impacts are consistently identified, screened, and managed;
- To set out the responsibilities for E&S risk and impact identification, assessment, decision-making, as well as monitoring and escalation; and
- To work with the PFIs and the sub-borrowers to manage E&S risks and impacts and support ongoing capacity building in the implementation of the Project.

2.1 Applicable Standards and Guidelines

The project is a Financial Intermediary (FI) project. However, since the credit risk stays with the Government, instead of participating financial institutions there is a single project fiduciary agent (PFA). The PFA will use the loan and conditional operational manual as its instructions for loan initiation, processing, recommendations to the FD and PECU, and (after approval) issue the loans based on a review of technical specifications, financial review, and E&S requirements.

The project's potential negative environmental impacts (dust from cleaning and blasting, odour due to painting, wastewater containing solvents, fuel and oil from maintenance activities, solid waste etc.) are likely to be minor, localized, manageable and can be mitigated with simple measures and environmental and social good practices. No large scale, significant and/or irreversible impacts are financed under the proposed project. Similarly if new boats are to be bought there must be consideration for the fuel source and quantities required, noise, energy efficiency, maintenance requirements, emissions and use of climate friendly construction materials such as fiberglass.

For these sub-projects, ESS9 as well as ESS 1, 2, and 10 are applied. To ensure that the potential E&S risks are adequately screened and mitigated, an ESMS will be prepared by the PFA (or adopting this ESMS) and to be consulted and disclosed within 45 days after the component has met disbursement conditions and the project has been declared effectiveness.

During the project implementation, all candidate sub-projects will be screened by PFIs against the project's exclusion list of this ESMS, categorized and assessed for their E&S risks and impacts prior to financing under the project. Since most of the FI subprojects (loans for boat replacement) are likely to cause minimal or no adverse environmental or social risks or impacts, it is expected that in all subprojects, the PFIs will apply the national environmental, labour and social laws and regulations.

The following are the standards at a minimum that the ESMS will apply to all transactions:

- Exclusion List (see ANNEX A: EXCLUSION LIST);
- Applicable local, provincial and national laws and regulations (see 2.4 Relevant Laws in Barbados);

- Screening out of any substantial and high-risk activities (see ANNEX B: ENVIRONMENTAL AND SOCIAL RISK CATEGORIZATION GUIDANCE and ANNEX C: SCREENING AND APPRAISAL FORM);
- Monitor the sub-loans (see ANNEX E: BIENNIAL ENVIRONMENTAL AND SOCIAL MONITORING REPORT TEMPLATE FOR FIs and ANNEX G: E&S MONITORING REPORT);
- Implement Labour Management Procedures (Annex H) and SEP as well as GRM.

As High or Substantial Risk sub-loans will not be financed under this project, Substantial and High-Risk activities are also described below for classification purposes only. Note that given the nature of the projects to be financed these are not anticipated to be encountered, nonetheless should be confirmed with the application of the ESMS. Also see **Error! Reference source not found.** This also includes descriptions of the types of activities that would be eligible under the ESMS (Low and Moderate Risk activities). For clarity, characteristics of Substantial and High-Risk activities are provided below.

2.2 Substantial and High-Risk Activities

Characteristics may include:

- A range of significant adverse risks and impacts
- Mostly temporary, predictable and/or reversible, and the nature of the Project does not preclude the possibility of avoiding or reversing them (although substantial investment and time may be required) to long term, permanent and/or irreversible, impossible to avoid entirely;
- Possibility of avoiding or reversing but with substantial investment and time to some that cannot be mitigated or require complex, unproven mitigation, sophisticated social analysis
- Medium in magnitude and/or in spatial extent (the geographical area and size of the population likely to be affected are medium to large) to high in magnitude and/or in spatial extent (large to very large area or population);
- The potential for cumulative impacts may exist;
- Medium to low probability of serious adverse effects to human health and/or the environment (e.g. due to accidents, toxic waste disposal, etc.) with known and reliable mechanisms to prevent or minimize such incidents to a high probability of serious adverse effects to human health and/or the environment
- Effects of the project on areas of high value or sensitivity to impacts on higher value and sensitivity (e.g. protected and internationally recognized areas)
- High value, sensitive lands or rights of ethnic minorities and other vulnerable minorities
- Involuntary resettlement or land acquisition
- Impacts on cultural heritage or densely populated urban areas
- the adverse social impacts of the project, and the associated mitigation measures, may give rise to a limited degree of social conflict, harm or human security risks
- A history of unrest in area or sector, concerns about use of security forces

2.3 Moderate – Low Risk Activities

The potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the Project is not complex and/or large, does not involve activities that have a high potential for harming people or the environment, and is

located away from environmentally or socially sensitive areas. The project's risk and impacts can be easily mitigated in a predictable manner. Characteristics may include:

- Predictable and expected to be temporary and/or reversible;
- Low in magnitude;
- Site-specific, without likelihood of impacts beyond the actual footprint of the Project; and
- Low probability of serious adverse effects to human health and/or the environment (e.g. do not involve use or disposal of toxic materials/substances, routine safety precautions are expected to be sufficient to prevent accidents, etc.).

2.4 Relevant Laws in Barbados

All sub-loans provided need to be compliant with the provisions of legal framework of Barbados (e.g. environment, social, health, safety and labour laws, construction and operation permits etc.) as such there is a need to screen to ensure that material aspects are met in addition to sub-borrowers confirming compliance with the relevant laws as part of the loan agreement.

The key relevant legislation:

Occupational Health and Safety

The Safety and Health at Work Act (SHaW) (2005) is the main legislation governing health and safety in Barbados. It provides a comprehensive framework for protecting workers' health, safety, and welfare in the workplace.

The Act makes provisions for securing the health, safety and welfare of persons at work, protecting other persons against risks to health and safety in connection with the activities of persons at work, controlling certain emissions into the environment and consolidating the law which relates to health safety and welfare in the work place.

The Act outlines the general duties of employers, which include providing a safe and healthy working environment, safe systems of work, and necessary personal protective equipment. It also outlines the general duties of employees, which include taking reasonable care of themselves and others, and cooperating with employers in meeting safety obligations.

The SHaW Act covers all workplaces with the exception of a private household where persons work or are employed only in domestic service, the Police Force, Barbados Defence Force or certain work carried out in a harbour or wet dock.

Supplementary Regulations

Several regulations supplement the core Safety and Health at Work Act (2005), providing more detailed requirements for various sectors and hazards. These include the Workplace (General Duties) Regulations (2007), Workplace (Sanitary Conveniences) Regulations (2007), Workplace (Washing Facilities) Regulations (2007), Workplace (Personal Protective Equipment) Regulations (2007), Workplace (Noise) Regulations (2007), and Workplace (Drinking Water) Regulations (2007).

The Accidents and Occupational Diseases (Notification) Act (1983) requires employers to notify the Chief Labour Officer of workplace accidents and occupational diseases.

Core Health and Safety Standards

The laws and regulations establish the following core health and safety standards:

- Risk Assessment and Control: Employers must identify hazards, assess risks, and implement control measures.
- Safe Work Systems and Procedures: Development of safe work procedures to minimize risks associated with tasks, machinery, and hazardous substances.
- Emergency Preparedness: Plans and procedures for fire, medical emergencies, and evacuations.
- Provision of Information and Training: Workers must be provided with essential health and safety information and training relevant to their work activities.
- Enforcement and Administration
- The Labour Department, specifically the Chief Labour Officer and labour inspectors, are responsible for enforcing Barbados' health and safety legislation. The laws provide for penalties, including fines and imprisonment, for violations of health and safety regulations.

Environment

The Environment Protection Act 1997 provides the regulatory framework to help reduce and eliminate the discharge of pollutants into the air, land and water.

Administration

The Environmental Protection Department (EPD) is a regulatory government agency under the Ministry of Environment and National Beautification. It was established in 1971 and has responsibility for environmental monitoring and control of conditions likely to affect the quality of the land, air, water, and the general health and environmental well-being of the inhabitants of Barbados.

Waste Management

The Sanitation Service Authority Act (1974) established a Sanitation Service Authority (SSA). The SSA, which falls under the Ministry of Environment, National Beautification, Green and Blue Economy is responsible for street sweeping, and the collection, transportation and disposal of all household municipal solid waste, as well as the operation of the disposal site.

Municipal waste that is collected is transported to the Sustainable Barbados Recycling Centre (SBRC), which serves as a centralised location for the handling of all waste. The Centre aims to measure waste quantities and remove recoverable material before residual waste is transferred to landfill. Private waste companies also collect waste from businesses and institutions. This is generally also delivered to SBRC but may be taken directly to landfill.

The Environmental Impact Assessment Screening Guidelines for Development Applications have been developed by the Environmental Impact Assessment (EIA) Committee of the Planning and Development Board to provide guidance on the rationale, approach, and process of screening applications for development to determine the need for an EIA. This is in accordance with The Planning and Development (Environmental Impact Assessment) Regulations, 2021 of the Planning and Development Act 2019-5 (amended 2020), Section 4 paragraph 1, which requires the establishment of guidelines for the screening of development applications. The regulations also require that those guidelines should be made publicly available.

Labour Laws

In Barbados, there are a number of labour laws which define the rights and responsibilities of all agents in the workplace, namely employees, employers and any respective representative groups. Generally, labour law covers industrial relations, occupational safety and health and labour standards, reflective of ratified International Labour Organization (ILO) Conventions. Some of the relevant laws are:

Chapter 42: Occupational Training Act, Subsidiary Legislation A1

- Provides for the training of persons for, or in, gainful employment in occupations in all branches of economic activity in Barbados.

Chapter 47: National Insurance and Social Security Act, Subsidiary Legislation A1-T1

- Establishes a system of national insurance and social security for Barbados providing payments by way of sickness benefit, maternity benefit, invalidity benefit, funeral grant, old age contributory grant or pension, non-contributory old age pension and survivors benefit and such other benefits as may be specified in the Act aforesaid.

Chapter 338: Accident & Occupational Disease (Notification) Act

- Provides for the notification of accidents and occupational diseases.

Chapter 345: Employment Exchanges Act

- Provides for the establishment of employment exchanges and for purposes connected therewith.

Chapter 345A: Employment of Women (Maternity Leave) Act

- Provides for the grant of maternity leave to female employees and for the protection of the employment of those employees during such leave.

Chapter 346: Employment (Miscellaneous Provisions) Act

- Repeals the Employment of Women, Young Persons and Children Act and make new provision relating to the employment of persons generally including young persons and children.

Chapter 349: Labour Clauses (Public Contracts) Act

- Carries out the Convention relating to Labour Clauses in Public Contracts.

Chapter 351: Protection of Wages

- Makes provision for the protection of wages of workers.

Chapter 354: Recruiting of Worker Act

- Carries out certain Conventions relating to recruiting of workers.

Chapter 355A: Severance Payments Act Subsidiary Legislation A1-F1

- Provides for the making by employers of severance payments to employees who cease to be employed in circumstances amounting to redundancy and for related matters.

Employment Rights Act- 2012

- This Act confers on employed persons, new employment rights. Among the rights provided for is a right to a statutory minimum amount of notice of termination for both employers and employees.

Employment Sexual Harassment (Prevention) 2017-21

Climate Change

Barbados created a National Climate Change Policy in 2012. This policy outlines plans to further institutional, administrative, and legislative work in both climate adaptation and mitigation in Barbados. The Green Economy Scoping Study and Coastal Risk Assessment and Management Program, among other programs, were developed to help achieve this goal.

3.0 SCOPE

The provisions of the ESMS are applicable to the MENB-PECU, the PFA, and the borrowers (fisherfolk) using funds provided by the Project.

The MENB-PECU is the entity responsible to assist the PFA in preparing this ESMS, provide ESF training, supervising, monitoring and reporting of ESMS implementation by the PFA as needed. The PECU will also regularly update environmental and social information and the \ portfolio Risk.

The PFA is the entity responsible for adoption, localisation and implementation of the ESMS for eligible sub-loans and ongoing monitoring. The ESMS of the PFA, consistent with this ESMS, will need to be prepared and disclosed before the loans can be disbursed.

4.0 ESMS COMMUNICATIONS AND DISCLOSURE

MENB, through its Communications Unit, and the PFA will ensure that all information related to the ESMS and sub-projects will be disclosed on the MENB website. This includes the approved environmental and social policy and procedures described in the ESMS, environmental and social assessment documents and plans, environmental approvals for specific subprojects, monitoring and progress reports on sub-projects, annual environment and social safeguards performance report, and grievance redress mechanism (GRM) (including complaints hotline, email and contact numbers). The GRM is explained in more detail in the Stakeholder Engagement Plan (SEP).

The ESMS is available on the Barbados Fisheries Division website:

- <https://www.fisheries.gov.bb/>

5.0 TRAINING AND CAPACITY DEVELOPMENT

The PECU and PFA are required to develop and maintain organisational capacity and competency for implementing the ESMS, with clearly defined roles and responsibilities. The PECU and the PFA will designate a representative of their senior management to have overall accountability for environmental and social performance of the sub-loans, including the implementation of this ESMS and Labour Procedures and resources necessary to support such implementation. The representative will:

- (a) designate a staff member to be responsible for day-to-day implementation of the ESMS, including the environmental and social procedures (the E&S focal point);
- (b) ensure that adequate resources are available for management of and training in environmental and social issues; and
- (c) ensure that adequate technical expertise, either in-house or external expert support, is available to carry out due diligence and manage the environmental and social risks of the project sub-loans, including providing implementation support as required.

MENB and the PFA and other relevant implementing support staff responsible for the Project, including the E&S Focal Point need to receive training (mainly from consultants but, sometime, from the staff of the World Bank) on the Project's ESMS and SEP, GRM Labour Management Procedures, provisions to prevent sexual abuse (SEA), Gender Based Violence (GBV) and/or violence against children (VAC), and the roles and responsibilities of different key agencies in the ESF implementation.

Relevant online training courses (in English) are provided below:

IFC Sustainability Training and E-Learning Program

This program has been designed for managers and staff of financial institutions (FIs) including banks, private equity funds, and others. This free e-training aims to help FIs better understand sustainable finance, social and environmental risk management and explore sustainability-related business opportunities.

IFC Environmental and Social Management Systems and Tools for Financial Institutions Financing Small and Medium Sized Enterprises (SME)s

This one hour webinar offered an overview of the business case for sound environmental and social risk management. It focused on Environmental and Social Management Systems (ESMS) and E&S due diligence tools for financial institutions providing financing to small businesses, and discussed practical solutions to implementation challenges commonly faced by financial institutions in this area.

IFC E-Learning Course on Managing Environmental and Social Performance

Take this course and learn how you can **help your clients manage their environmental and social risks**, thereby having a positive impact on their bottom line, reputation and development impact.

6.0 ENVIRONMENTAL AND SOCIAL PROCEDURES

The overall summary of the process of E&S review under the ESMS is set out below

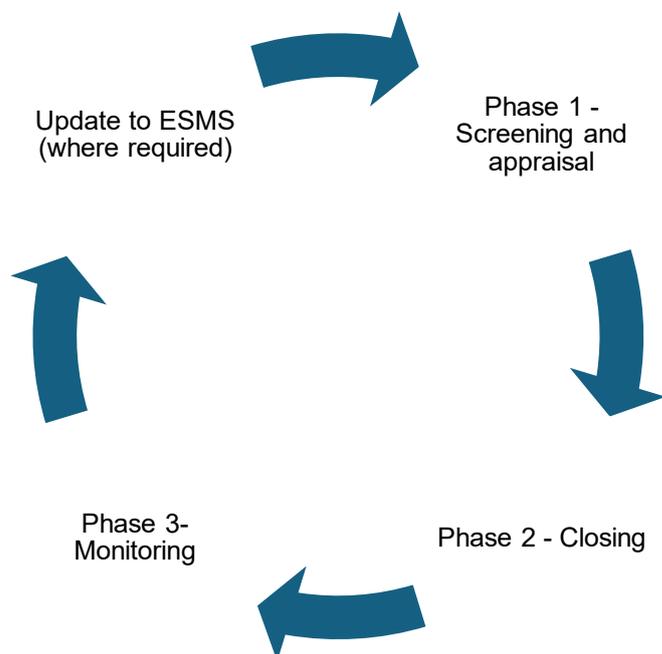


Figure 1: E&S Review Process

- **Phase 1 – Screening and Appraisal**
 - Screen against exclusion list activities
 - Categorise
 - Conduct an E&S appraisal of the sub-borrower

Table 1: Phase 1: Screening and Appraisal (for the PFA to conduct)

Entity	Responsibilities	Documents
Loan Officer	<ul style="list-style-type: none"> ▪ Screen a sub-borrower’s activities against the Exclusion List (in Appendix A). ▪ If any excluded activities are identified, then the loan should proceed no further. ▪ If no exclusion list activities are identified, then the application can proceed to the next Phase. ▪ Categorisation should be undertaken (see Error! Reference source not found.) of the sub-borrower also see Table 2 below. <ul style="list-style-type: none"> – Where “high” or “substantial” risk activities are identified, the sub-loan processing should not 	<ul style="list-style-type: none"> ▪ Completed screening assessment refer to Error! Reference source not found.

Entity	Responsibilities	Documents
	<p>proceed. This includes an activity that requires an EIA in Barbados.</p> <ul style="list-style-type: none"> ▪ The sub-borrower must be able to demonstrate compliance with applicable national laws and regulations in Barbados, including permits and approvals). ▪ Where compliance cannot be demonstrated, an E&S Action Plan must be agreed with the sub-borrower in order for the sub-loan to proceed. The plan must specify all of the necessary actions to bring the sub-borrower into compliance. A target completion date for each specified action must also be agreed. A template is included in Error! Reference source not found. 	
PFA E&S Focal Point	<ul style="list-style-type: none"> ▪ Provide input and support where required in screening of the sub-loan, including categorisation and identifying any gaps to be addressed. 	-
Credit	<ul style="list-style-type: none"> ▪ This is the last part of evaluation, and is required to confirm: <ul style="list-style-type: none"> ▪ No exclusion list activities (including high/substantial risk activities) ▪ The E&S risks have been appropriately understood, including the category, and where necessary a corrective action plan developed ▪ Reject to provide loan (business or loan purpose exists in Exclusion List) 	<ul style="list-style-type: none"> ▪ Reviewed screening assessment refer to Error! Reference source not found.

Table 2: E&S Categorisation

Category	Definition	Notes
High Risk	High Risk means any business activity which is likely to have significant adverse environmental impacts that are sensitive, diverse or unprecedented, and which includes, for the avoidance of doubt, activities involving (a) involuntary resettlement, (b) risk of adverse impacts on ethnic minorities, (c) significant risks to or impacts on the environment, community health and safety, biodiversity, cultural heritage, or (d) significant occupational health	Not allowed to proceed under the ESMS.

Category	Definition	Notes
	and safety risks (risk of serious injury or fatality to workers).	
Substantial Risk	Substantial Risk means any business activity that is not as complex as High-Risk activities, however, has some significant risks and impacts with the possibility of avoiding or reversing but with substantial investment and time and may give rise to limited degree of social conflict, harm, human security risk.	Not allowed to proceed ESMS.
Moderate Risk	Moderate Risk means any business activity that has potentially limited adverse environmental or social risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures. Impacts are often site-specific without likelihood of impacts beyond the activity's footprint and routine safety precautions are expected to be sufficient to prevent accidents.	Allowed, but requires review (see Annex C).
Low Risk	Low Risk means any business activity minimal or negligible risks to and impacts on human populations and/or the environment with few or no adverse risks and impacts and issues.	Allowed but should be straightforward to review (see Annex C).

Note – also see Annex B for further detail.

- **Phase 2 – Closing**
 - Confirm commitments in the loan agreement (and any actions required)

Table 3: Phase 2: Closing

Entity	Responsibilities	Documents
Loan Officer	<ul style="list-style-type: none"> ▪ Review legal documentation in relation to E&S related definitions, representations and undertakings, including the incorporation of any actions required to address gaps. Error! Reference source not found.. ▪ Key inclusions of the legal agreement with the sub-borrowers are: <ul style="list-style-type: none"> – Not to engage in any activities on the Exclusion List – To comply with all legal requirements. 	<ul style="list-style-type: none"> ▪ Legal Agreement with E&S inclusions for the sub-borrower

Entity	Responsibilities	Documents
	<ul style="list-style-type: none"> - To report to the PFI if there is a substantial change in the nature of the operations. - To report to the PFI if there are any material E&S incidents. - (If required) to address any gaps identified. 	
Credit	<ul style="list-style-type: none"> ▪ Ensure that the legal agreement with the borrower meets ESMS requirements on E&S aspects. 	<ul style="list-style-type: none"> ▪ Legal Agreement with E&S inclusions for the sub-borrower

- **Phase 3 – Monitoring**
 - As part of regular monitoring follow-up on E&S aspects and also any E&S issues reported by the sub-borrower

Table 4: Phase 3: Monitoring

Entity	Responsibilities	Documents
Loan Officer	<ul style="list-style-type: none"> ▪ Ensure there is reporting of material adverse E&S events. A template is included in Error! Reference source not found. for the PFI to formally record these events. Examples of material E&S incidents may include: <ul style="list-style-type: none"> - Major injuries or fatalities (employees, the general public or contractors); - Strikes or significant employee disputes; - Regulator action in relation to E&S matters; - Spills, pollution incidents, fires, explosions; and ▪ The category will determine the extent of monitoring and oversight required of the sub-loan during the post-financial close monitoring phase. Monitoring will <ul style="list-style-type: none"> - Low risk sub-loans do not require monitoring. - Medium risk sub-loans require straightforward follow-up to find out if there have been any significant changes in business activities, confirm ongoing compliance with the exclusion list and local requirements and any actions required to be addressed have been closed out. 	<ul style="list-style-type: none"> ▪ Error! Reference source not found. ▪ An example (that can be tailored) is included as Error! Reference source not found. for annual monitoring.

Entity	Responsibilities	Documents
	<p>Monitoring will be undertaken annually. (If the sub-loan tenor is less than 12 months monitoring is not required.) Annual site visits to these transactions are also recommended.</p> <ul style="list-style-type: none"> ▪ In the event of non-compliance in relation to E&S matters (including material issues reported or a grievance raised) the PFI will seek to resolve the issue with the sub-borrower in order to address the issue. Actions will be documented, and the PFI will work with the sub-borrower to ensure that corrective actions are implemented. If the issue cannot be addressed through engagement, the PFI may seek to remedy the situation through available clauses in the loan documentation. Material developments will be reported to the PECU for onward reporting to World Bank. 	

7.0 REPORTING

Material Adverse Effects

Sub-borrowers will be required to promptly report to the PFI (which will report to the PECU) any actual or potential material adverse E&S event immediately after becoming aware of it.

As noted above, these include:

- Major injuries or fatalities (of employees, the general public or contractors);
- Strikes or significant employee disputes;
- Regulator action in relation to E&S matters;
- Spills, pollution incidents, fires, explosions;

Routine Reporting

The PFIs are required to report semi-annually to the PECU. In turn the PECU will report annually to World Bank.

A format is included in **Error! Reference source not found.**

8.0 STAKEHOLDER ENGAGEMENT PLAN (SEP)

As part of the Project, as required under the ESCP, the PECU has prepared, disclosed, adopted, and implemented a Stakeholder Engagement Plan (SEP) consistent with ESS10. As part of the SEP, a Grievance Mechanism is described.

The overall objective of the SEP is to define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire Project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the Project and any activities related to the Project. The PECU is responsible for maintaining the SEP.

The SEP has been publicly disclosed here:

<https://www.fisheries.gov.bb/>

9.0 REVIEW AND UPDATE OF THE ESMS

The ESMS will be updated and reviewed:

- In the first year after initial deployment by the PECU, and thereafter annually.
- If there are modifications in the Applicable Standards under the ESMS (for example significant changes to local legalisation).
- Incorporation of feedback from the SEP/Grievance Mechanism.
- Documentation of lessons learnt and/or good practice based on implementation.

Note that revisions will need to be communicated to all relevant partners such as PFIs and the World Bank (through the PECU).

10.0 DOCUMENT CONTROL

MENB has established a robust M&E system to record and monitor all aspects of the Line of Credit (LOC) component. Funds under the LOC will be disbursed to PFA based on documentation on sub-loans provided by the PFA, which will include a check list in accordance with this ESMF and confirmation that all submitted sub-loans will be in compliance with the requirements of the ESMS. These documents will be entered into the M&E system and stored in the PECU filing system for Project documents, for prior or post review by the World Bank or for audit purposes.

The PFA will also maintain sub-loan documents submitted to MENB under their own filing systems. In addition, the PFA will:

- The PFA will provide MENB with a set of documentation for all sub-loans to enable it to maintain all project records and make them available for ex post review by the World Bank or by external auditors as necessary; and
- The PFA and sub-borrowers will be required to provide reasonable information for the purpose of monitoring and an impact assessment during the life of the project (and for a certain period after the project), as may be requested by the World Bank and/or MENB.

ANNEXES

ANNEX A: EXCLUSION LIST

These are a list of activities that form part of the ESMS where any involvement would trigger a “no go” on providing a loan to a Sub-borrower. For the avoidance of doubt, any activities that require an Environmental impact Assessment (EIA) under the regulations in Barbados are excluded. In Barbados, an Environmental Impact Assessment (EIA) is required for any proposed development that could significantly affect the environment. The Planning and Development (Amendment) Act 2020 specifies which types of development require an EIA.

The PFA acting for the MENB, must apply the following exclusions to ALL sub-loans processed under the Project:

Some activities that typically require an EIA include:

- construction of buildings,
- new infrastructure,
- power generation,
- quarrying,
- mining,
- drilling

- Waste management facilities and waste disposal sites
- New or improved roads within Cultural Heritage Conservation Areas

More specifically, an appointed Environmental Impact Assessment Committee, can make a determination that a project/activity requires an EIA. The Committee shall establish guidelines for screening applications, including applications for approval in principle, keep those guidelines under continuous review and revise them from time to time as it considers necessary or expedient. The screening guidelines may include consideration of the following:

- the size and scale of the proposed development;
- the location of the proposed development in relation to sites or areas that are of special importance or vulnerability;
- the activities involved in the proposed development that may particularly activities with complex and potentially adverse impacts, including but not limited to serious impacts on human beings and valued ecosystem components, or which would cause additional loading of the environment to unsustainable levels. seriously impact on human beings and valued ecosystem components; or cause additional loading of the environment to unsustainable levels.

ANNEX B: ENVIRONMENTAL AND SOCIAL RISK CATEGORIZATION GUIDANCE

Categorisation

This document is intended to provide guidance on the categorization of sub-borrowers. Whilst this guide provides an overview to the characteristics and some examples of each category, categorisation should be considered on a case by case basis factors such as location, environmental & social context, scale, and magnitude of impacts need to be considered.

Category	Definition	Example Activities
High and Substantial Risk	<p>High Risk means any business activity which is likely to have significant adverse environmental impacts that are sensitive, diverse or unprecedented, and which includes, for the avoidance of doubt, activities involving (a) involuntary resettlement, (b) risk of adverse impacts on indigenous peoples, (c) significant risks to or impacts on the environment, community health and safety, biodiversity, cultural heritage, or (d) significant occupational health and safety risks (risk of serious injury or fatality to workers).</p> <p>Substantial Risk means any business activity that is not as complex as High Risk activities, however, has some significant risks and impacts with the possibility of avoiding or reversing but with substantial investment and time and may give rise to limited degree of social conflict, harm, human security risk.</p>	<ul style="list-style-type: none"> ▪ Activities that require an EIA in Barbados
Moderate Risk	<p>Moderate Risk means any business activity that has potentially limited adverse environmental or social risks and/or impacts that are few in</p>	<ul style="list-style-type: none"> ▪ Acquisition of new transportation equipment (automobiles, trucks, other specialised equipment, and replacement parts);

Category	Definition	Example Activities
	<p>number, generally site-specific, largely reversible, and readily addressed through mitigation measures. Impacts are often site-specific without likelihood of impacts beyond the activity's footprint and routine safety precautions are expected to be sufficient to prevent accidents.</p>	<ul style="list-style-type: none"> ▪ Small-scale processing of agricultural produce e.g. rice. ▪ Building of small warehouses or renovation of existing physical premises on the land fully-owned by the business; ▪ Acquisition of assets such as industrial machines, medium sized tools and equipment.
Low Risk	<p>Low Risk means any business activity minimal or negligible risks to and impacts on human populations and/or the environment with few or no adverse risks and impacts and issues.</p>	<ul style="list-style-type: none"> ▪ Office based activities such as marketing, consultancy, etc. ▪ Working capital needs (loans for payment of salaries, marketing costs, audit and accounting costs); ▪ Acquisition of communications equipment (phone and fax equipment, computers, printers, servers, software, other hardware, etc.); ▪ Purchase of construction materials for shops selling construction material, ▪ Purchase of feed stock, and feed mixer machine; ▪ Acquisition of fixed small assets (refrigerators, replacement parts, etc.), small tools and equipment etc.). ▪ All types of retail outlets (except those dealing in hazardous or toxic chemicals, flammable materials); and ▪ Restaurants and other food premises.

ANNEX C: SCREENING AND APPRAISAL FORM

Environmental and Social Aspects Screening Checklist	
Borrower Name:	Location:
Loan Amount (US\$) and Purpose:	
Industry Sector:	Brief Borrower Description:
Completed by:	Reviewed by:
Date:	Date:
<p>Category</p> <p> <input type="checkbox"/> Low Risk <input type="checkbox"/> Medium Risk <input type="checkbox"/> High/Substantial Risk (<i>do not proceed</i>) </p> <p>Rationale (please summarise the reasons for the category selected):</p>	
Compliance with the Applicable Requirements — Check all that apply:	
<p>Exclusion List Activities Yes <input type="checkbox"/> No <input type="checkbox"/> (<i>if there are exclusion list activities identified do not proceed</i>)</p> <p>National regulatory requirements Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p> <input type="checkbox"/> Environmental, health and safety permits granted: (_____) </p> <p> <input type="checkbox"/> Injuries and fatalities have occurred: (how and when: _____) </p> <p><input type="checkbox"/> Labour-related fines:</p>	

(when and why: _____)

Environmental incidents and fines:

(when and why: _____)

Site(s)—Check all that apply:

- Non-urban/undeveloped land
- Proximity to river/stream/pond/lake
- Proximity to protected area (e.g. forest/endangered species)/ecologically sensitive area (e.g., river/protected areas)
- Proximity to culturally sensitive/indigenous area

Environmental Issues – Check all that apply:

Air emissions

- Boilers
- Generators
- Vehicles and equipment
- Furnaces and incinerators
- Welding and soldering
- On-site burning
- Use of solvents
- Use of fumigation
- Use of exhaust ventilation

Waste water

Waste water discharged to:

-
- Oil separators
 - Cleaning operations
 - Cleaning operations
 - Spraying operations
 - Separation tanks or filters
 - Foul sewers and septic tanks
 - De-watering/water pump out
 - Water treatment units

Solid waste

- Waste generated
- Types of waste:

Hazardous chemicals, fuels, and pesticides

- On-site chemicals or fuels storage
- Protective measures against leaks/spills
- Signs of leaks/spills
- Protective measures against rain
- Signs of corrosion on tanks/containers
- Secured storage areas against theft
- On-site spill clean- up equipment

<input type="checkbox"/> Hazardous waste (e.g., waste oils, pesticide washings, solvents, clinical waste, asbestos) Waste disposed to <hr/>	<input type="checkbox"/> Training on proper handling of chemicals and fuels <input type="checkbox"/> Pesticide use and management
<p><i>Resource use</i></p> <input type="checkbox"/> Main Materials used: <hr/> <hr/> <input type="checkbox"/> Use of renewable natural resources <input type="checkbox"/> Use of tools and equipment <input type="checkbox"/> Water source: <hr/> <input type="checkbox"/> Energy source: <hr/>	<p><i>Nuisance</i></p> <input type="checkbox"/> Dust <input type="checkbox"/> Noise <input type="checkbox"/> Odours <input type="checkbox"/> Fumes <input type="checkbox"/> Vibration <input type="checkbox"/> Traffic congestion
<p>Based on the above are there any issues (e.g. poor practices, hazardous conditions, non-compliance with local requirements etc.)? If so, please describe:</p>	

Community Interactions — Check all that apply:

- No designated person in charge of responding to questions from the community
- No procedures for managing community complaints
- Use of security personnel

Based on the above are there any issues (e.g. community complaints, problems with the community and security personnel, etc.)? If so, please describe:

Social issues – Check all that apply:

- Land acquisition required (do not proceed)
- Displacement/resettlement of local settlements (do not proceed)
- Impact on local settlements/livelihood (do not proceed)
- Impact on indigenous peoples (do not proceed)
- Complaints from neighbours/communities
- On or adjacent to site of cultural/archaeological importance (do not proceed)

Based on the above please describe briefly any issues:

Labour issues —Check all that apply:

- No Personal Protective Equipment provided (e.g., safety goggles/hard hat/protective glove)
- Inadequate employee health and safety measures (e.g. fall prevention/ventilation)
- Inadequate working conditions (e.g., air quality/lighting/confined spaces/on-site hygiene)
- Inadequate terms of employment (e.g., working hours/rest breaks/time off/overtime pay)
- Unequal employment opportunities (e.g., discrimination against gender/ethnic group/age)
- Payment below minimum wage
- Employees below minimum age
- Child or forced labour (do not proceed)
- No process for employees to voice complaints
- No recognition of employee organizations/labour unions

Comments (any issues identified):

Additional comments

Please provide further details (e.g. number of persons affected due to E&S gaps identified, types of emissions, hazardous substances found, etc.) for better clarity of the E&S condition at the investee company and attach any supporting documents where applicable.

Comments:

Actions to be taken (include in the loan agreement)

The following actions are to be taken to address gaps against national requirement (in case of exclusion list issues the loan should not proceed). Note gaps to be addressed should be put into the E&S Action Plan (see Annex D of the ESMS):

Ref. No.	Action Description AND Related Standards/Requirement	Completion Indicator	Due Date (DD/MM/YYYY or defined number of days linked to an event e.g. after loan disbursement)

ANNEX D: TEMPLATE ENVIRONMENTAL AND SOCIAL ACTION PLAN

An Environmental and Social Action Plan (ESAP) should be tabular in format and designed to address the gaps identified in the sub-loan assessment (Annex C) and should be incorporated into the loan documentation. The aim is for the ESAP to be as succinct as possible, but clear, and set realistic timelines with clarity on what is required.

Reference No.	Action Description AND Related Standards/Requirement	Completion Indicator	Due Date (DD/MM/YYYY or defined number of days linked to an event)
1	<i>e.g. Ensure that all workers have written contracts that explain their rights and obligations and have had these contracts explained to them this should be in line with Labour Code.</i>	<i>Contracts signed by all workers</i>	<i>Within 90 days after the loan receipt.</i>
<i>etc.</i>	<i>etc.</i>	<i>etc.</i>	<i>etc.</i>

ANNEX E: BIENNIAL ENVIRONMENTAL AND SOCIAL MONITORING REPORT TEMPLATE FOR FIs

Name of Organization			
Completed by (name):			
Position in organisation:		Date:	

Portfolio Information

Report Covering Period:	
From:	To:

For the reporting period, please provide the following information about your portfolio:

Product line	Description	Total exposure outstanding for most recent FY year end (in US\$)	Average loan or transaction size (in US\$)
SME Loans	SMEs are defined as small firms with less than 25 employees and medium firms with 26-50 employees (according to Small Business Development (Amendment) Act of 2006). Only employment size regulation of this Decree shall be applied for SME eligibility to borrow under this Project.		

Exposure by Industry Sectors (not sure if this is needed)

Please provide an indicative % of portfolio that these sectors represent of the total portfolio.

Industrial Sector	Outstanding exposure (in US\$)	% of portfolio
Animal Production		
Apparel		
Chemicals		
Collective Investment Vehicles		
Common Carriers		
Construction and Real Estate		
Consumer Goods		
Crop Production		
Electrical Equipment, Appliances and Components		
Fabric Mills		
Fabricated Metal Product Manufacturing		
Finance & Insurance		
Finishing (Dyeing, Printing, Finishing, etc.)		
Fishing		
Food & Beverages		
Forestry		
Furniture and Related Products		
Integrated Textile Operation (Spinning, Weaving/Knitting, but no Garment)		
Internet Projects		
Leather and Allied Products		
Machinery and Other Industrial		
Non-metallic Mineral Product Manufacturing		
Oil, Gas and Mining		
Plastics & Rubber		
Primary Metals		
Printing & Publishing		
Pulp & Paper		
Spinning (Yarn, Including Integrated with Fiber Production)		
Telecommunications		

Textiles - Others		
Transport Service		
Transportation Equipment		
Utilities		
Warehousing & Storage		
Wholesale and Retail Trade covering any of the following. Gasoline stations, dry cleaners, printing, large auto and truck fleets, photographic film processing and any operations involving the use of any chemical or biological wastes or materials		
Wood Products		
Total		

Exclusion List Exposures (Type of Activity)	Outstanding Exposure in US\$	Name of Company*	Loan Due Date

ESMS Processes	Yes/No	
Have there been any updates to the ESMS or procedure?		If yes, please provide a copy of the updated procedure and reasons for the same.
Has Senior management signed off on the changes?		If yes, please provide a copy of the same.
Were any transactions rejected on an account of the exclusion list?		If yes, please provide details.
Were there any difficulties and/or constraints related to the implementation of the E&S procedures?		If yes, please provide details.
Were there any material environmental and social issues associated with borrowers during the reporting period in particular?		If yes, please provide details.
Supervision and monitoring	Yes/No	
Have you supervised the performance of your loans?		If yes, please describe how you do this and the extent of coverage of your portfolio.

Did you conduct client site visits?		If yes, please describe the process including any environmental and social issues considered.
-------------------------------------	--	---

Safety, Social and Community Issues	Yes/No	
Have there been any worker accidents, injuries on the job?		If yes, please provide details.
Have there been any grievances against any borrower?		
Has there been any media coverage on a borrower?		

ANNEX F: MATERIAL E&S INCIDENT REPORT TEMPLATE

Report on E&S Issues/Incident at a Sub-borrower	
Date of report	DD/MM/YYYY
Name of Sub-borrower	
Date of transaction and type of financing	
Amount outstanding/tenor	
Description of issue	<ul style="list-style-type: none"> • Date and time of incident. • Type of incident: environmental issue, fatality, spill, etc. • Name of person/s involved/injured/deceased, if applicable • Narrative and contextual information. • Causes of incident. • Status of investigation. • Listing of parties involved in investigation (witnesses and staff, unions, police, other authorities, and other parties).
Actions taken by the sub-borrower	<ul style="list-style-type: none"> • Reporting if required to any regulator, police, etc. • Any internal investigations commenced (indicate contact name of person responsible for investigation). • Any external investigations anticipated or commenced (list all entities that have jurisdiction or could reasonably be expected to investigate the incident). • Any press releases or other media communications
Follow-up by PFI	<ul style="list-style-type: none"> • Views on the significance of the incident – degree of severity, possible uncertainties, or disputed facts to be investigated. • Status of investigation. • Reports received (and outstanding, if any). • Immediate actions taken by the PFI (including if communications/crisis response to be triggered). • Actions to prevent re-occurrence of incident.

	<ul style="list-style-type: none">• Monitoring/reporting arrangements to follow up on efficacy of actions taken.• Results to date of actions taken.
Conclusion	<ul style="list-style-type: none">• Broader conclusions for the PFI/PECU

ANNEX G: E&S MONITORING REPORT

Reviewer (Name, Title and Position):	Sub-Loan Name and #:	Date loan issued:
---	-----------------------------	--------------------------

Situation and Observations:

1. Are the sub-borrower's activities the same as at origination?
2. Are there any excluded activities?
3. Are all permits in order and is the sub-borrower following all required regulations? Y / N
4. Did the SME encounter any unexpected environmental and/or social issues and how were they addressed? Any media coverage, grievance issues or outstanding liability?
5. Other Comments

Approved by (Name, Title and Position):

ANNEX H: LABOUR MANAGEMENT PROCEDURE (LMP)

1. OVERVIEW OF LABOUR USE ON THE PROJECT

The Labour Management Procedure (LMP) outlines the essential guidelines and strategies to ensure the smooth and efficient management of labour for this Project. This procedure aims to safeguard the rights and well-being of workers while ensuring that the project adheres to international labour standards and local regulations. The LMP and ESS 2 apply to all Project workers whether full-time, part-time, temporary, seasonal or migrant, hired in relation to any of the Project's components. The Project's workforce will include direct workers (directly employed by PECU), contracted workers (recruited by third parties such as contractors or as Firms hiring consultants), and potentially primary supply workers. The LMP has been publicly disclosed here:

<https://www.fisheries.gov.bb/>

The Project is expected to engage a variety of staff in the PECU and the PFA as identified below.

Staff Type	Estimated Number of Project Workers	Characteristics of Project Workers	Timing of Labour Requirements	Contracted Workers
PECU	10	Project Manager Project Engineer, Financial Management Specialist, Finance Services Specialist, Procurement Specialist, Environmental Specialist, Social Specialist, Disaster Risk Management, Specialist, Communication Specialist and Monitoring & Evaluation Specialist	Throughout project cycle	Direct workers
PFA	Unknown at this stage	Loan Officer Credit Officer E&S Focal Point Others:	Throughout project cycle	Direct workers

Staff Type	Estimated Number of Project Workers	Characteristics of Project Workers	Timing of Labour Requirements	Contracted Workers
		Other core PFA staff as required		

2. ASSESSMENT OF THE KEY POTENTIAL LABOUR RISKS AND MITIGATION MEASURES

The key labour and occupational health and safety (OHS) risks which may be associated with the Project are outlined below as well as proposed mitigation measures which will be implemented.

Employment and Working Conditions

- **Anticipated Risks:** Lack of formal contracts, lack of disability insurance, lack of adherence to official work hours, non-compliance with labour laws (e.g., child labour, forced labour), discrimination, and unequal pay.
- **Mitigation Measures:** Development and monitoring of the Labour Management Plans (LMPs), age verification, stakeholder awareness sessions and equal pay procedures.

Grievance Mechanism (GM)

- **Anticipated Risks:** Inadequate access to a GM, lack of awareness of a GM, and non-functioning GM.
- **Mitigation Measures:** Multi-tiered GM access (direct, contracted and primary supply workers), public awareness on use of GM, trained personnel for GM, and structured escalation procedures.

Occupational Health and Safety (OHS) Plans

- **Anticipated Risks:** Slips, trips and falls, serious accidents and fatalities, exposure to hazardous materials, machinery hazards, traffic incidents and accidents, and noise.
- **Mitigation Measures:** Adequate implementation of OHS plans (per international standards), recruitment of certified OHS specialists, training, PPE provision, first aid, and supervision of adequate implementation of OHS Plan.

Recruitment Policy for Contracted Workers

- **Anticipated Risks:** Corruption, nepotism, discrimination, and local exclusion.
- **Mitigation Measures:** Transparent and non-discriminatory recruitment, prioritization of local employment, prioritization of local unskilled labour, and cultural orientation.

3. OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

This section sets out the key aspects of the national labour legislation with regards to occupational health and safety. **The Safety and Health at Work Act (SHAW), 2005** is the principal legislation governing occupational health and safety in Barbados. It provides a comprehensive legal framework aimed at securing the health, safety, and welfare of individuals at work, protecting others who may be affected by work activities, controlling emissions into the environment, and consolidating existing laws related to workplace health and safety. The Act outlines general duties for both employers and employees. Employers are required to provide a safe and healthy working environment, implement safe systems of work, and supply necessary personal protective equipment (PPE). Employees, in turn, are expected to take reasonable care for their own safety and that of their colleagues, and to cooperate with their employers in meeting safety obligations.

The SHAW Act applies to all workplaces with a few exceptions, including private households employing only domestic workers, the Barbados Police Force, the Barbados Defence Force, and specific work carried out in harbours or wet docks. To support the SHAW Act, **several supplementary regulations** were introduced in 2007. These include the Workplace (General Duties) Regulations, Sanitary Conveniences Regulations, Washing Facilities Regulations, Personal Protective Equipment Regulations, Noise Regulations, and Drinking Water Regulations. These provide more detailed requirements for workplace conditions and sector-specific hazards.

In addition to the SHAW Act, the **Accidents and Occupational Diseases (Notification) Act, 1983** mandates that employers report all notifiable workplace accidents—defined as incidents resulting in death or more than three days of disablement—to the Chief Labour Officer. Occupational diseases are also reportable under this Act. These provisions support the Labour Department's oversight role, particularly in the investigation of workplace accidents and enforcement of occupational health standards. While Barbados does not operate a separate workers' compensation system, injured workers are entitled to employment injury benefits through the National Insurance and Social Security Act.

Barbados' occupational health and safety legislation establishes several core standards. These include:

- Mandatory risk assessments and the implementation of appropriate control measures
- Development of safe systems of work and handling of hazardous materials
- Emergency preparedness and response procedures
- Provision of information and training to workers on safety matters relevant to their roles
- Enforcement is the responsibility of the Labour Department, led by the Chief Labour Officer and supported by labour inspectors. The legislation provides for penalties, including fines and imprisonment, for violations of occupational health and safety laws.

4. RESPONSIBLE STAFF

This section identifies the functions within the Project responsible for Labour Management:

The Project Execution and Coordinating Unit (PECU) is responsible for overseeing and monitoring the implementation of the LMP. Their core duties include informing workers of their rights and responsibilities, providing health and safety training and resources, ensuring

compliance with national labour laws and World Bank requirements, and facilitating effective communication between workers and management.

Contractors and subcontractors are required to comply with the LMP and ensure fair and safe working conditions. Their responsibilities include implementing health and safety measures as outlined in their ESMPs, providing fair wages and benefits in line with legal standards, promoting non-discrimination and equal opportunity employment, and responding promptly to worker grievances.

Workers are expected to adhere to the LMP by following established health and safety protocols, treating colleagues and management with respect, and reporting unsafe conditions or grievances.

5. OVERVIEW OF POLICIES AND PROCEDURES

To manage risks related to labour and occupational health and safety (OHS) under the project, standardized contract clauses will be included to ensure contractors understand their obligations. The Project Execution and Coordinating Unit (PECU) will oversee and enforce compliance, including ensuring that employment contracts adhere to the LMP.

If a contractor fails to comply with their Site-Specific Environmental and Social Management Plan (CESMP) or OHS Plan, the PECU must immediately notify the contractor's Project Manager, and E&S/OHS staff will initiate corrective measures. All workers must sign a Code of Conduct before work begins, which covers workplace behaviour and community interactions, with specific clauses addressing Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH). Training, including induction and daily toolbox talks, will reinforce expected behaviours and community values.

PECU's E&S staff will engage regularly with workers to promote environmental awareness and ensure alignment with health, safety, and environmental standards. Contractors are required to include GBV prevention procedures in their ESMPs, including awareness efforts, Codes of Conduct, and a separate grievance mechanism (GM) for handling GBV-related complaints.

In the event of serious incidents—such as fatalities, major environmental damage, or GBV allegations—workers must report immediately to the site supervisor or social safeguard officer. The World Bank must also be notified and provided with incident details. A review must be conducted to determine causes, and a Corrective Action Plan agreed upon and implemented to prevent recurrence.

OHS Procedures

The purpose of the OHS procedures is to safeguard the health and well-being of all project workers. These procedures define the authority for OHS plan implementation and are mandatory across all activities of the PECU, contractors, and project beneficiaries. The OHS Management System includes standards, policies, and monitoring mechanisms that address workplace safety, worker health, and environmental conditions.

OHS procedures will be developed covering the following:

- Compliance with all national and international OHS legislation that are applicable to the participating country governments and the World Bank
- Compliance with the Environmental and Social Standards of the World Bank
- World Bank Environmental Health and Safety (EHS) Guidelines
- Prevention of injury and ill health of all project workers
- Identification and assessment of hazards
- Measures to manage the hazards including establishment of safety systems, processes and performance
- Continuous improvement of Safety Systems
- Prevention of use of faulty equipment or sub-standard equipment
- Compliance with public health protocols
- Training and awareness
- Investigation and reporting of incidents. The World Bank guidance given in the Environment and Social Incident Response Toolkit (ESIRT) can be used as a guide to report incidents.

6. AGE OF EMPLOYMENT

In Barbados, the minimum legal age for employment is 16 years. Youths between the ages of 16 and 18 may be employed under a project only if specific conditions are met:

1. The work must not be hazardous.
2. A risk assessment must be conducted beforehand.
3. The project must conduct regular monitoring of the child's health, working conditions, work hours, and compliance with ESS2.

Children under 18 must not be employed in any role that is hazardous, interferes with their education, or is harmful to their health, or their physical, mental, spiritual, moral, or social development.

7. TERMS AND CONDITIONS

Applicable terms and conditions as per Barbados Labour Law applies, and the relevant stipulations including written service contract detailing the worker's salary, working hours and leave, rights and allowance, Code of Conduct, duration of contract, and terms and conditions for termination of contract by employer and worker alike. The contract should be signed by both parties, who each will keep a copy.

Direct workers, such as those employed by the PECU, are governed by the provisions of the ESS2.

Contracted workers must have terms and conditions aligned with both the national Employment Rights Act (ERA) and the ESF. These contracts are reviewed by PECU for compliance and must meet the following minimum standards:

- Contracts must be written and include details on wages, working hours, and termination procedures.
- Minimum notice periods must be observed, based on the duration of service.

- Contracted workers dismissed due to redundancy are typically entitled to severance pay.
- Workers are protected against unfair dismissal and can contest termination under the ERA.
- The Protection of Wages Act ensures workers are paid in legal tender and safeguarded from unauthorized deductions.

Migrant Workers: Migrant workers are employed under the project and their contracts must reflect fair treatment and lawful terms, and must also comply with ESF requirements.

Hours of Work: Employers must not require employees to exceed the legal limits. The standard workweek in Barbados is 40 hours—8 hours per day, five days a week—with two days off, usually Saturday and Sunday. Overtime must be voluntary and is not to be requested routinely. The total of regular and overtime hours must not exceed 60 hours per week, except in exceptional cases. Overtime is paid at 150% of the regular rate, while work on public holidays is compensated at double time (200%). Employers cannot penalize employees who refuse to work overtime.

Compensation: Workers must be paid at least the minimum wage or the applicable prevailing wage, whichever is higher. As of April 2021, the minimum wage in Barbados is BBD \$8.50 per hour. Payment methods may vary—hourly, daily, weekly, biweekly, or monthly—but the total must comply with legal minimums. Workers are entitled to all legally required fringe benefits, including overtime pay and severance payments.

Notice for termination of contract: Termination of employment requires written notice from either contracting party.

Maternity leave: Entitles eligible workers to 12 weeks of paid leave, typically divided into six weeks before and after childbirth.

Wage deductions: Permitted only as outlined by law, collective agreements, or for repayment of advances documented in writing. Contractors are strictly prohibited from soliciting or accepting payments or gifts from workers in exchange for employment or for favourable treatment.

Death benefits: In the event of a worker's death, employers are responsible for paying death benefits to the deceased's dependents, in accordance with the National Insurance and Social Security Service.

Medical treatment of injured and sick workers: Employers are responsible for ensuring the health and safety of employees, including providing necessary medical treatment for injuries or illnesses. This includes transporting injured workers to a hospital if they cannot be treated on-site.

Collective Agreements: Collective agreements between employers and unions—if in place—shall govern relevant terms and conditions of employment.

8. GRIEVANCE MECHANISM (GM)

The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved. The GM is designed to be objective, prompt, and responsive to the needs of aggrieved workers. Multiple submission channels are encouraged, including in-person, phone, text message, mail, email, and anonymous submissions. Grievances must be recorded and acknowledged within one day of receipt. Urgent matters, especially those related to health and safety, should be addressed immediately. If a grievance cannot be resolved within a reasonable timeframe, the worker must be notified in writing and advised of available next steps. Workers can request confidentiality, and anonymous complaints are permitted and must be addressed with equal seriousness. The Grievance Mechanism is detailed in the final SEP.

The Table below describes the different levels of grievances.

Levels of grievances

Grievance Category	Description	Internal response	Responsibility
Level 1 Low risk	When an answer can be provided immediately. E.g., issues with the communication of information regarding the project.	Respond immediately to complainant. Record and report. It does not require internal consultation	Social Specialist or assigned specialist
Level 2 moderate risk	One-off grievance that requires measured response and actions/commitments to resolve complaint. E.g., dissatisfaction with response received at level 1; reports of health and safety concerns, complaints about project timeline issues, field staff or civil works.	Social specialist or assigned specialist, will review, and classify the complaint. If it is classified as a level 2 grievance, the PM will investigate and respond in coordination with the E&S Specialists. Where the Project Manager is the subject of the grievance, the complaint should be directed to a contact in the Ministry responsible for the project.	Project Manager Representative from the MENB (Permanent Secretary)
Level 3 High risk	Legal violations on the part of project staff or	Social specialist or assigned specialist, will review and	Grievance Redress

Grievance Category	Description	Internal response	Responsibility
	beneficiaries; Repeated, extensive and high-profile grievances that may jeopardize the reputation of the project. E.g., cases of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), reports of fraudulent disbursement funds, failure to deliver promised inputs.	<p>classify the complaint. The assigned specialist will be trained to attend to GBV/SEAH once onboard to the Project. If it is classified as a level 3 grievance, the PM will form a Grievance Redress Committee (GRC) that will be in charge of addressing this level complaint. The GRC will provide advice on how to solve complaints within this level.</p> <p>For SEAH cases, a list of GBV service providers will be kept available by the project. If an incident is reported through the GM, a survivor-centered approach will be used. Any cases of GBV brought through the GM will be documented but remain closed/sealed to maintain the confidentiality of the survivor.</p>	Committee (GRC)

GM Procedure

Every contractor/subcontractor must appoint a designated grievance contact person. For PECU workers, the Project Manager will serve as the point of contact. Contact details for grievance officers will be made available before any workers are hired and shared upon contract signing.

The Project will have a single Grievance Mechanism system that will manage grievance to address public, workers and SEAH-related issues. The GM will serve as a single point of contact for both workers and the public to submit complaints or concerns related to the project. This system is intended to enhance accountability and responsiveness, allowing individuals to report potential adverse impacts on themselves, their communities, or the environment.

All grievances submitted by project workers will be logged and documented by the PECU Project Manager. If grievances are submitted directly to a contractor's representative or another point of contact, that individual must immediately inform the PECU Project Manager. In cases where the grievance involves the Project Manager, they must recuse themselves, and the complaint should be redirected to an identified contact at the Ministry responsible for the project.

The designated point of contact will aim to resolve grievances within 7 to 14 days of receipt. For urgent matters, the grievance must be addressed within a minimum of 24 hours and no more than 15 calendar days. Grievances may be submitted in person, by phone, in writing (including anonymous submissions) and via dedicated email or telephone hotline. Complaints received by phone or in person will be documented, and if the complainant consents to disclosure, they may be asked to sign the written record of their grievance.

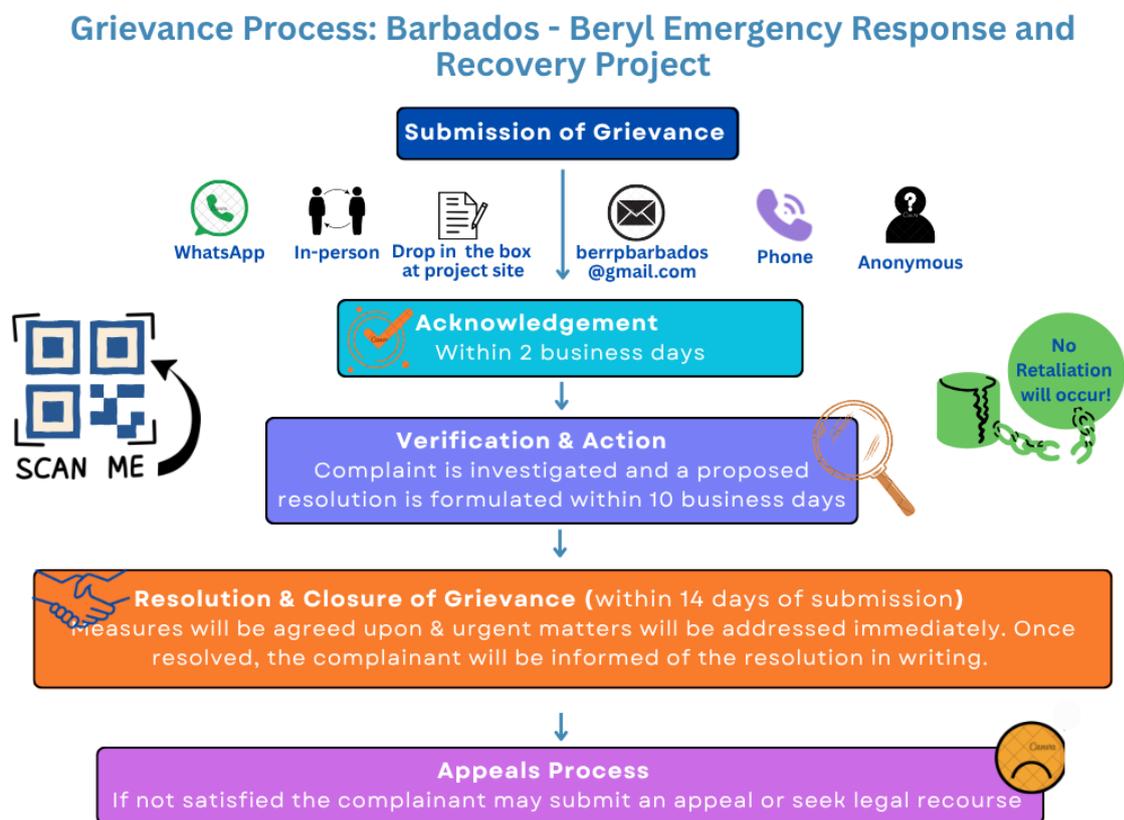
Submission of complaint to:

Email: berrpbarbados@gmail.com

Reference: GM Barbados – Beryl Emergency Response and Recovery Project (P507190)

Address: Regus, One Welches, Barbados, BB22025

Mobile Number 535 - 5800



The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

The project will have other measures in place to handle sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH). The Project

will also have a Labor Grievance Mechanism that workers can use and that will be described in detail in the Labor Management Procedures to be formulated after Project effectiveness and within the timeframe established in the ESCP.

The World Bank and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

Regarding SEA/SH related complaints:

The GM will specify an individual who will be responsible for dealing with any SEA/SH issues, should they arise. A list of SEA/SH service providers will be kept available by the project. The GM should assist SEA/SH survivors by referring them to Services Provider(s) for support immediately after receiving a complaint directly from a survivor. To address SEA/SH, the project will follow the guidance provided on the World Bank Technical Note “Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing Involving Civil Works”.

Grievance form

Grievance No.:

REGISTRATION OF GRIEVANCE

Please use capitals:

Personal Details are optional, providing these details may help resolve the grievance, please provide the information below:

Name: _____

Contact No: _____

Address: _____

E-mail Address: _____

(Detail where to find you)

Gender:

Age Group:

Name of Project Site: _____

I register my grievance as detailed:

Details of Grievance

(a) Outline reasons why and how you are affected by the project. (overleaf if necessary)

(b) If land or other properties are being affected e.g. (agriculture) include copies of relevant documentation you have, to support your claim.

List documents:

A: _____

B: _____

C: _____

D: _____

Undertaking:

I hereby certify that statements made in my Grievance and documentation enclosed are true and complete to the best of my knowledge. If at any time any part of the Grievance or the documentation is found to be false, I will be liable for any legal action that the Government of Barbados may deem necessary.

Date:

Signature of aggrieved person: (optional)

Name of recording Officer: _____

Signature: _____

(Please print)

(continue overleaf if necessary)