

Environmental & Social Action Plan for KLED (St. Lucia) # 17231 (May 2021)

No.	Action	Deliverable	Completion date
PS 1 Assessment and Management of Environmental and Social Risks and Impacts			
1	Update ESMS in compliance with requirements of MIGA PS 1 and relevant laws and regulations of Saint Lucia to include: <ul style="list-style-type: none"> - health and safety - community grievance mechanism - traffic control plan - security management plan - external communications - the procedure for the periodic E&S monitoring, - E&S reporting lines between KLED and its main contractors - updated Emergency Response Plan The ESMS will be applied during the construction and operations phase and will also be implemented by contractors and subcontractors	Submit to MIGA the Project's ESMS manual	September 1 st , 2021
2	The PE will update ESHS Policy document to include i) KLED's management commitment and responsibility to ensure compliance with the Policy; and ii) adherence to MIGA PS 1 ii) ensure the Policy is communicated to contractors.	Submit to MIGA Updated ESHS Policy	August 1 st , 2021
3	KLED will require IWE and K&B to appoint a qualified Health, Safety and Environment (HSE) officer to manage Project E&S risks and impacts in line with the requirements of MIGA's PS1 during Project construction and operations phases.	Submit to MIGA the appointed HSE officer's CVs and Appointment Letter and Terms of Reference	July 1 st , 2021
4	Develop and implement a Stakeholder Engagement Plan (SEP) for the LED installation and O&M stage.	SEP document	September 1 st , 2021
5	Develop External Communication and Community Grievance Mechanism in line with MIGA PS1	External Communications and Community Grievance document	September 1 st , 2021
6	Update the EPRP section in the ESMS Manual to establish the Emergency Response Team (ERT) and describe ERT's responsibility, and a procedure for regular drills. KLED will also integrate its EPRP with the one available at IWE and LUCELEC for a coordinated action in case of emergency require IWE and K&B to update their ESRP to be in line with MIGA PS1	Submit to MIGA an updated EPRPs of KLED, IWE and K&B	September 1 st , 2021
PS 2 Labor and Working Conditions			
7	Update the Code of Conduct to policies related to gender-based violence and harassment at the workplace and the requirement that all employees have written contracts. Disclose and communicate the HR Policy to all contractor employees.	Updated Code of Conduct and the evidence that it was communicated to all contractors	August 1 st , 2021
8	Develop Human Resources (HR) policy and procedures that are Project specific during retrofitting/ installation and operation to ensure they are in line with MIGA's PS2 and St. Lucia's labor laws. The Contractors (IWE and K&B) will ensure that all direct and indirect employees are aware of its content.	Updated HR Policy	September 1 st , 2021

9	Develop worker's grievance mechanism and require IWE and K&B to develop one in line with MIGA PS2 requirements and make available to all workers.	Worker Grievance procedure	August 1st, 2021
10	Develop a training matrix which will reflect the health and safety competency levels for each work stream	Training Matrix	August 1st, 2021
PS 3 Resource Efficiency and Pollution Prevention			
11	Update the Waste Management Plan and ensure that IWE waste sorting facilities are in line with the requirements of the World Bank Group EHS Guidelines.	Updated Waste Management Plan and the evidence of the facilities upgrade	August 1st, 2021
PS 4 Resource Efficiency and Pollution Prevention			
12	Develop Security Management Plan to determine the actions to be taken by the security personnel and by KLED/ IWE in case of security incidents.	Security Management Plan document	September 1 st , 2021
13	Update the Traffic Control Plan to include provisions for road closures and alternative routes, as well as the procedure for notification of and coordination with the local traffic authorities.	Updated traffic control plan	September 1st, 2021
14	Develop a Security Management Plan to determine the actions to be taken by the security personnel and by KLED/ IWE in case of security incidents	Submit to MIGA Security Management Plan	September 1st, 2021
PS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources			
15	Where the Project is adjacent to the sites adjacent to protected areas install LED lights with the lower correlated color temperature (below 2700 K)	Evidence of the installation	At the end of the retrofitting stage
16	Update the project EMP to ensure that during installation, operations and maintenance, KLED will ensure that the EPC contractors will minimize any impacts to flora and fauna in line Saint Lucia's Laws and MIGA PS6 requirements	Submit to MIGA an updated EMP	Before the start of the retrofitting work