



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 07/30/2019 | Report No: ESRSC00721



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
St. Lucia	LATIN AMERICA AND CARIBBEAN	P170860	
Project Name	Caribbean Regional Air Transport Connectivity Project - St. Lucia		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing	4/1/2020	6/18/2020
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance, Economic Growth, Job Creation, External Affairs and Public Service	Minister for Economic Development, Housing, Urban Renewal, Transport and Civil Aviation, Ministry of Infrastructure, Ports, Energy and Labour, Saint Lucia Air and Sea Ports Authority		

Public Disclosure

Proposed Development Objective(s)

The Project Development Objective is to improve air transport safety in compliance with international and regional standards and enhance resilience of airport infrastructure to natural disasters.

Financing (in USD Million)	Amount
Total Project Cost	45.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]



The proposed project aims at (i) improving resilience and operational safety of the runway at HIA, (ii) improving air traffic safety and efficiency, and (iii) building capacity on air transport management. The Project cost is estimated at US\$45 million

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social] Saint Lucia, an upper-middle income small island Caribbean state with a gross national income per capita of US\$11,370 (2016) and a population of 178,000 (2016), has been challenged by relatively low levels of economic growth and high unemployment since 2011. Given its geographic location and topography, Saint Lucia is highly exposed to hydro-meteorological and geological hazards and the impacts of climate change, which have significant negative impacts to its economic stability and social development gains. According to the Global Climate Risk Index 2018, Saint Lucia is among the top high-risk countries in the world, ranking 18th globally in terms of vulnerability of its GDP to weather-related losses from 1997 to 2016.

St. Lucia has made substantial progress in eliminating extreme poverty. However, progress in poverty reduction is affected by unemployment, vulnerability to external and climatic shocks, large diaspora, which is also mentioned also mentioned as a cause for “Brain drain” and is an often-cited constraint to OECS growth, although it should be acknowledged that the flow of remittances and the size of the diaspora reflect favorably on the education systems of the OECS.

The unemployed and the underemployed together account for over 40 percent of the working-age population in St. Lucia. One of the sectors with enormous potential for growth and contribution in reducing poverty in St. Lucia is the development of tourism that in turn depends substantially on the development of their airport infrastructure, its safety and resilience.

The proposed project sites for civil works will be within the perimeters of two existing airports on the eastern Caribbean island of Saint Lucia: Hewanorra International Airport (HIA) and Georges FL Charles airport (SLU). The former is on the south coast and the latter is on the leeward (west) side on the northwest side of the country. Both are quite near the coast with elevations as low as a few meters above mean sea level, and both have direct drainages to the ocean that are in part influenced by tidal effects.

The HIA was originally constructed in the 1940’s over a former grassland or wetland area which no longer has value as natural habitat, but the La Tourney Nature Reserve includes a wetland that borders the airport property to the north and west. The La Tourney River occupies the fairly large Vieux Fort watershed which carries significant flow during storm events (e.g. December 2013 flood).

The drainage system of the HIA grounds function very poorly during heavy rainfall events that affect the airport. The river was diverted around the airport during runway expansion in the 1970’s, and its former channel passes beneath the runway through a buried culvert that has been eroded by periodic flood events. To the northeast of the airport lies the Point Sable Marine Protected Area, where coral reefs and seagrass create important natural habitat; and, to the northwest are beaches and a fishing port. SLU is on the outskirts of Castries adjacent to a cemetery and Vigie Beach. The cemetery is an important site to the community. Storm water runoff from developments in the city of Castries has greatly impacted the coral offshore of Vigie Beach, and the beach itself is heavily used for recreation. A



large storm drain leads from the airport through the cemetery and on to Vigie Beach. Both airports are on lands that have been heavily altered by human activity and are adjacent to coastal and marine resources. Drainage systems at both airports function poorly, and water from rainstorms pools close to the runway for extended periods of time before running off or infiltrating. However, the proposed project interventions will mainly be limited to the existing facilities of the airports and will not contribute any additional runoff due to the project intervention. In addition, the project will also support the improvement of drainage system of HIA to enhance airport resiliency.

D. 2. Borrower’s Institutional Capacity

The Ministry of Infrastructure has interfaced with World Bank on numerous infrastructure projects and therefore has some familiarity with the World Bank safeguards policy requirement; however, they do not have a dedicated unit or staff on environmental and social issue management, since the safeguard support on those projects was provided through PCU safeguards specialists. On the other hand, St. Lucia Air and Seaports Authority (SLASPA) has no prior experience in implementing World Bank funded project. A new PIU likely within Ministry of Infrastructure will need to hire the service of environmental and social specialist as individual consultant or supervision consultant with environmental and social monitoring and reporting included within the Scope of Work, to ensure the contractor(s) follow the environmental and social requirements under the contracts and implement Environmental and Social Management Plan for the duration of the work.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The environmental risk classification is Moderate under the World Bank Environmental and Social Framework based on the nature and scale of the project intervention and client capacity. The proposed physical works are mainly focused on improvement of existing runway and drainage facilities in HIA. In addition, the will include equipment to improve traffic safety and efficiency in both airports. The project locations are largely within urbanized and developed areas with restricted access, thus minimizing community health and safety risks. The works are straightforward civil works. Project activities are expected to be site-specific (occurring uniquely within the current demarcations of both airports), limited in number, likely reversible in nature, and can be mitigated with measures that are readily identifiable and technically and economically feasible. Minimal impact to areas outside the airport perimeters is foreseen, as the ADS-B tower locations will be screened for site access and land ownership. The improvement/expansion of existing drainage systems in HIA requires additional studies during the design phase to effectively reduce the flooding risk of airfield flooding associated with the annual rainy season, hurricanes and climate change. The main environmental risk is from erosion and sedimentation that could impact off-site coastal and marine habitat, but the terrain is flat at the work sites and there are standard construction protocols and operations design parameters to address these risks.

Measures to mitigate the potential risks and impacts will be included in the Environmental and Social Management Plans (ESMPs) to be prepared by the Client for each of the airports and the ADS-B sites through an Environmental and Social Assessment (ESA) which will be disclosed in-country and on the World Bank Group (WBG) external web site. The relevant environmental and social instruments will be incorporated into the Environmental and Social Commitment Plan (ESCP) to be prepared and agreed with the Client as a requirement of the legal agreement that will



ensure project compliance with the Environment and Social Standards and the WBG Environmental, Health and Safety (EHS) Guidelines.

Social Risk Rating

Moderate

The social risk classification is Moderate. Construction work will be limited to the resurfacing of existing runway and reconstruction of existing emergency rooms -for Aircraft Rescue and Fire Fighting - at the HIA airport, and at two small ADS-B tower sites, where permanent and/or temporary displacement are not expected. The other 2 components of the project are focused mainly on capacity building, investment in safety and resilience of existing infrastructure - mainly drainage.

Some risks associated to labor influx may exist -an estimate of some 20-50 workers -most workers will be coming from local communities. More specific data will be available by appraisal- for the resurfacing of airport runway may take place, as well of the possible use of primary supplier to provide raw materials like sand that may need some type of due diligence, to prevent the use of child labor. The project will implement labor management procedures, Occupational Health and Safety (OHS), a grievance mechanism for workers as well as due diligence to prevent the use of all forms of forced labor and child labor as well as other pertinent instruments to address these potential risks. As part of the environmental and social assessment, the Borrower will identify potential risks of child labor and safety issues which may arise in relation As to primary suppliers.

The Bank will review the Environmental and Social Risk Classification (ESRC) on a regular basis throughout the project life cycle to ensure that it continues to accurately reflect the level of risk the project presents.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The standard is relevant for the project. Although the proposed project is likely to reap positive environmental and social benefits through enhancing safety and resilience at the two existing airports, the project has potential environmental and social risks associated with the physical upgrading of the HIA existing runway and improvement of air traffic safety and efficiency system in both airports.

The key environmental and social risks and impacts are related to: (i) sedimentation and erosions from drainage work, (ii) management of solid and hazardous waste from disposal of old equipment and construction and machinery during installation of different new equipment and repairing/renewal works; (iii) nuisances related to air and noise emissions from installation and repairing works; (iv) occupational health and safety of workers and supervisors; (v) community health and safety arising from increased construction-related traffic; and vi) labor influx from high- or low-skilled workers in the project areas. The Environmental and Social Assessment (ESA) will consider any operational phase issues that should inform design of the civil works and their subsequent operation and maintenance. Some potential operational phase impacts that may ensue from improved conditions are for example, increased noise from greater air traffic, more inflow of people, goods and services from increased demand on the airport facilities and growth in surrounding areas, impacts on natural habitats, among others possible.



The implementing agency will go through the process of assessing the environmental and social risks and impacts through preparation of an ESA and site specific Environmental and Social Management Plans (ESMPs) for each airport and the ADS-B equipment towers.

The ESMPs will consider potential impacts from the improved operations, and E&S issues will be integrated into overall capacity-building efforts of component three. Support for PIU core functions, will include the addition of E&S specialist(s) or existing personnel trained in these issues, and tasked with implementing best-practices and oversight of operational E&S issues. Establishing a basic E&S management system, will be considered part of ensuring improved standards for civil aviation operations.

The ESMPs will include protocols for debris management, construction practice, and health and safety issues, and incorporate standard mitigation procedures, and where necessary, will draw on international good practices and expertise in the aviation sector. The ESMPs will also include site specific issues such as controlling sedimentation and erosion. The contractors will be required, as a condition of their contracts, to implement/comply with the ESMPs. Contractors would be expected to include site-specific management plans that would guide the management of environmental and social risks for the component 1. Considering the limited capacity of the implementing agency on environmental and social risk management, an Environmental and Social Specialist will be contracted by the PIU. Further to that, the provision of a Supervision Consultant will be explored with the implementing agency to ensure the ESMP is followed for component 1. The ESMPs will incorporate relevant World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines and these will also be part of bidding and contracting documents. Potential for energy efficient lighting (LED) will also be considered in the ESMPs.

The ESMPs will seek to ensure any legacy issues such as oil or fuel pollution are dealt with under the runway and other infrastructure to be repaired. The infrastructure will also consider measures to minimize impacts in cases of spills and retention of sediment that may runoff into adjacent areas.

To ensure that the Contingency Emergency Response Component (CERC) Component complies with the requirements of the World Bank Safeguard Policies, the activities identified for financing under Component 4 will be subject to an expedited review by safeguards specialists to determine if they are eligible under the safeguard policies and compliance procedures. Further, Further, the ESA and ESMPs will contain procedures for debris removal and disposal, which should encompass the majority of CERC activities with potential for negative environmental impact. the ESA and the ESMP will have a section that will include: a) the potential emergencies and the types of activities likely to be financed and b) a screening process for the potential emergency response activities, including which kinds of emergency response activities can proceed with no additional environmental or social assessment, and which ones would require assessment (and at what level) prior to being initiated. Implementation arrangements for the emergency response activities under the CERC will also be addressed.

Areas where “Use of Borrower Framework” is being considered:

None.

ESS10 Stakeholder Engagement and Information Disclosure



The standard is relevant. The main stakeholders are Government workers and officials as well as the nearby communities and the general public who will make use of airport transportation services. Government agencies that will be involved are: Ministry of Infrastructure, Ports, Energy and Labour; Ministry of Finance, Economic Growth, Job Creation, External Affairs and the Public Service; Ministry of Infrastructure, Ports, Energy and Labour; Ministry of Agriculture, Fisheries, Physical Planning, Natural Resources and Co-operatives; Ministry of Health and Wellness; Ministry of Education, Innovation, Gender Relations and Sustainable Development; Ministry of Tourism, Information and Broadcasting, Eastern Caribbean Civil Aviation Authority (ECCAA), the Chamber of Commerce, among others.

The Government will submit a Stakeholder Engagement Plan (SEP) that outlines a) who the key stakeholders are; b) how they are to be engaged; c) how often the engagement will occur throughout the project; d) how feedback will be solicited, recorded and monitored over the project; e) who will be charged/responsible with this engagement; f) timeline for this engagement, and so on. The World Bank will review the adequacy of the SEP which, as an ES instrument, must be cleared by appraisal. The process of stakeholder engagement will begin during preparation and continue into implementation. Prior to appraisal, the following measures will be implemented: i) stakeholder identification and analysis and ii) planning how the engagement with stakeholders, iii) disclosure of information and iv) consultation with stakeholder. The SEP is expected to be updated from time to time as/if necessary. The SEP will also describe the measures that will be used to remove obstacles to participation, and how the views of differently affected groups will be captured.

The Borrower will propose and implement a Grievance Redress Mechanism (GRM) to receive and facilitate the resolution of concerns and grievances. The nature of eligible grievances under the GRM will be described as part of the SEP. During initial screening, we have not identified an existing GRM linked to the airport operations. However, St. Lucia does have in place GRMs for other World Bank financed projects and that will serve as a basis for the proposed GRM to be prepared.

Public Disclosure

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

This standard is relevant given that the project will hire direct workers that will be engaged directly by the Borrower to work specifically in relation to the project. Some specialized personal may be hired to install state of the art safety equipment and for training to enhance capacity building. Some unskilled workers may also be hired to perform small, repetitive, and unskilled tasks, but relatively in small amount that will be estimated before project appraisal. The project may also be engaged with contracted workers who are people employed or engaged through third parties for different aspects of project implementation including resurfacing of airport runway (an estimate of 50 workers). Even though not necessarily the case, primary supply workers could be involved and to provide raw material like sand for the resurfacing of the runway . The project does not intend to include the use of community workers.

The estimated number and type of direct and specialized workers will be quantified before appraisal. As part of the project's preparation stage, the borrower capacity to manage hired workers, will be assessed, and relevant recommendations for capacity strengthening, will be identified.



Government civil servants are expected to work in connection with the project, whether full-time or part-time. They will remain subject to the terms and conditions of their existing public-sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project. ESS2 will not apply to such government civil servants, except for the provisions of Protecting the Work Force Occupational Health and Safety and child and forced labor.

As substantial public works will be financed by the project, the environmental and social assessment process will include an analysis of (i) labor and working conditions (LWC) and (ii) of occupational health and safety (OHS). LWC analysis will include potential issues related to child and forced labor or lack of equal opportunities for female employees. The WBG team will review the specific HR processes and practices for the project in line with due requirements. This includes some requirements for Labor Management Procedures, Grievance Redress Mechanism specifically for workers and Occupational Health and Safety practices. The Labor Management Procedures (LMPs) will be developed prior to project effectiveness.

ESS3 Resource Efficiency and Pollution Prevention and Management

The standard is relevant to avoid or minimize project-related emissions and generation of waste, and to promote the sustainable use of energy.

The physical interventions at the airports will generate construction debris and hazardous or non-hazardous waste - wastewater, fuel, asphalt, chemicals, wood and building materials, among others. The CERC activities may also include debris removal and disposal. The appraisal stage ESRS will estimate if the amount of waste will be significant -based on data that will be provided by the ESA - and the ESMPs will address appropriate measures for the disposal or reuse of waste materials.

The project will be promoting proper waste management practices as part of the Environmental and Social Management Plans (ESMPs). These measures would help minimization of hazardous and nonhazardous waste production and appropriate management of wastes. These measures will be reflected the contract documents (for repairing and installation) to ensure the requirements to manage waste from construction operations, including end location of the waste removed. The technical specifications of different equipment will promote energy efficiency and measures to reduce GHG emissions. The project will use energy efficient Light Emitting Diode (LED) bulbs in runway lightening. Based on a preliminary inspection there are no contaminated soils or water that would be encountered during the works. Firefighting training areas that could contain foam (AFFF) are located at a distance from the runways, and storage tanks for jet fuel and hydrocarbons are also some distance from the runways. In the case of HIA, there is an abandoned fuel line that crosses beneath the runway. If the abandoned line is uncovered during excavation, it will be carefully screened for residual hydrocarbon contamination using protocols defined in the ESMPs. Any contaminated soils or materials will be handled, stored, and disposed of appropriately. The project will not undertake GHG accounting given the negligible change in emissions from the project.



ESS4 Community Health and Safety

The Standard is relevant considering the physical works in HIA and installation of equipment at two airports. Although the work will be confined to the existing and secured areas of the two airports, some of the associated activities such as transportation of construction materials, machinery and equipment may increase the risk of traffic hazard and associated incidents. In addition, there are some chances of community health and safety risk if unauthorized people enter at work zones. ESMPs will outline the measures to reduce the community health and safety measures especially establishment of a security perimeter around the site to minimize the risks of injury or accidental exposure to hazardous materials for communities, especially children. This will be done through signage, and temporary fencing where appropriate, will be needed to cordon off entryways, to ensure public (passengers) safety. Further to that, regarding provisions of security and safety, the client has provisions in place to ensure security personnel is informed/educated on their role and their conduct (no use of force except for preventative or defense purposes) while on the premises and security personnel shall be screened for past offenses. Security personnel will be present to enforce restriction and to keep people out of harm's way. The borrower will use existing airport security, and if additional personal will be needed, it is estimated that it will be in minimum amount. A more precise estimation will be made before appraisal. The risk associated with additional security personnel during civil works and exposure to hazardous materials will be assessed. The ESMP will also include mitigation measures for storage, handling, transportation and disposal of hazardous materials such as fuels, as part of Airport Security and Safety. Contractor will put in place a traffic management plan to ensure that trucks unloading equipment do not unnecessarily cause traffic jams and so equipment and supplies can be safely offloaded. In addition, the ESMPs will focus on the potential risks from increased traffic and heavy equipment operations in and around the airports.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The standard not currently. Project activities are not expected to require the acquisition and restrictions on land use. No project-related land acquisition or restrictions on land use will take place and therefore, there is no potential for physical displacement (relocation, loss of residential land or loss of shelter) or economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood). The project identification mission, also did not perceive any legacy issues with the airport that the WB needs to be aware of.

The selected locations for potential ADS-B tower locations and their access routes, are intended to be located on public lands. However, this will be screened and further evaluated in the ESA. If the purchase or acquisition of any lands is needed, then ESS5 will become relevant and such activity will be done in compliance with this standard.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The Standard is relevant in that the resurfacing of the runway of HIA and the drainage works will take place in an area near wetlands (the La Tourney Natural Area) and sensitive marine and coastal habitat (the Point Sable Marine Reserve); thus, there is the potential for negative impact on the biodiversity and on the sustainably management of living natural resources. Measures to avoid or address such impacts will be included in the ESMP for HIA, strict runoff and erosion/sedimentation control plans for these civil works. The ESA will provide guidance to include an evaluation of the systems and verification practices used by the primary suppliers to ensure that any natural resource commodities specifically sand mining will not result any significant conversion or significant degradation of natural or



critical habitats due to the physical work in HIA. Primary suppliers (e.g. of sand) will also be verified to ensure that provisions of raw materials are sourced with consideration of ESS6 provisions. The borrower will identify where the supply is coming from and the habitat type of the source area and take appropriate measures consistent with ESS6.

The ESMPs for all facilities will also consider operational phase issues, including wildlife strikes and that will be addressed as part of any operational strengthening and planning that will be supported in line with the Airports EH&S guidelines. The ESA will address these issues and will inform the design of the civil works and their subsequent operation and maintenance to ensure habitats are not impacted. It will include impact analysis on terrestrial and marine habitats as well as migratory birds and flyways.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

The Standard is not currently relevant. There are no persons who meet the definition of indigenous people present in the project’s area of influence.

ESS8 Cultural Heritage

The Standard is relevant. The project does not envisage any impacts on physical, cultural, and/or archaeological sites. Most of the works will be limited to the existing facilities adjacent to the coastline. However, if any physical infrastructure works require excavation below ground, the borrower will rely on a chance finds procedure contained as a precaution in the project’s ESMPs and as part of construction contracts to be awarded under the project.

ESS9 Financial Intermediaries

The standard is currently not relevant, as there are no FIs involved in the project.

B.3 Other Relevant Project Risks

To date there are no additional risks or impacts that have been identified.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

Public Disclosure



Not applicable.

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

- Preparation of Environmental and Social Commitment Plan (ESCP)
- Preparation, consultation and disclosure of the Stakeholders Engagement Plan (SEP)
- Preparation, consultation and disclosure of an Environmental and Social Assessment (ESA) and Environmental and Social Management Plans (ESMPs)

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

The ESCP will likely address, at a minimum, commitments related to the following:

- Preparation and implementation of all ESMPs, incorporating appropriate measures into all repairing/renewal works and installation of equipment contracts prior to initiation of corresponding works at any project site
- Preparation and implementation of Labor Management Procedures and a Grievance Redress Mechanism for Project Workers.
- Preparation and implementation of Health and Safety Procedures for both workers and for the affected communities
- Establishment of a project Grievance Redress Mechanism as part of the SEP
- Finalization and implementation of Stakeholder Engagement Plan
- Monitoring and reporting of implementation of environmental and social management plan
- Capacity building of implementing agency on environmental and social risk management.

Public Disclosure

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

01-Apr-2020

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Ministry of Finance, Economic Growth, Job Creation, External Affairs and Public Service



Implementing Agency(ies)

Implementing Agency: Minister for Economic Development, Housing, Urban Renewal, Transport and Civil Aviation

Implementing Agency: Ministry of Infrastructure, Ports, Energy and Labour

Implementing Agency: Saint Lucia Air and Sea Ports Authority

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s):	Satoshi Ogita, Malaika Becoulet
Practice Manager (ENR/Social)	Valerie Hickey Recommended on 24-Jul-2019 at 21:45:50 EDT
Safeguards Advisor ESSA	Noreen Beg (SAESSA) Cleared on 30-Jul-2019 at 10:14:10 EDT